



CITY OF SACRAMENTO

22 + 2

CITY PLANNING DEPARTMENT
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MARTY VAN DUYN
PLANNING DIRECTOR

May 6, 1982

City Council
Sacramento, California

Honorable Members in Session:

SUBJECT: South Natomas Office Park Proposals (P-9114, P-9145,
P-9137)

SUMMARY:

On January 5, 1982, in response to the Natomas Eastside and Gateway Centre proposals, the City Council indicated an intent to approve a modification of the South Natomas community plan subject to the ten conditions outlined in the attached staff report to the City Planning Commission. Two weeks later, the Council directed staff to include Creekside Office Park in the January 5th motion.

Pursuant to the Council's motion, a task force consisting of City staff, Councilpersons Shore and Serna, and a representative of the South Natomas community met with the applicants on a regular basis. The task force was unable to determine the amount and the location of the potential office park. City staff members of the task force determined that no more than 1.2 million square feet of office on the west side of I-5 or 1.5 million square feet cumulatively on both sides of I-5 should be allowed. The Planning staff recommends that the office park should be limited to no more than 1.2 million square feet on the west side of I-5.

On April 29, the City Planning Commission adopted two motions: 1) to reaffirm the 1978 South Natomas Community Plan because the goals are still sound land use policies that assure long range objectives which remain reasonable; and 2) recommend 1.2 million square feet of office on the west side of I-5 subject to contingencies as described in the "Recommendation" section of this transmittal.

VOTE OF THE PLANNING COMMISSION

By a vote of seven ayes, one no, and one absent, the Planning Commission recommended approval of 1.2 million square feet of office on the west side of I-5 subject to the contingencies listed under "Recommendation".

City Council

-2-

May 6, 1982

RECOMMENDATION:

The City Planning Commission recommends that the City Council approve 1.2 million square feet of office on the west side of I-5 subject to the following:

1. That the office be developed as one contiguous project;
2. That the office park be located on both the north and south sides of West El Camino Avenue;
3. That the configuration of the office park be designed to accommodate large users;
4. That the residential development designated within the project boundaries be developed in concurrent phases with the office construction in order to encourage a job housing link; and
5. That the displaced residential units be made up in the remaining South Natomas Community Plan area located west of the Natomas Main Drainage Canal.

Respectfully submitted,



Marty Van Duyn
Planning Director

FOR CITY COUNCIL INFORMATION
WALTER J. SLIPE
CITY MANAGER

MVD:DP:cp
Attachments
P-9114, P-9145, P-9137

May 11, 1982
District No 1

SACRAMENTO CITY PLANNING COMMISSION

22423

MEETING DATE 4/29/82
 ITEM NO. 2 FILE NO. 1-

GENERAL PLAN AMENDMENT ☐ TENTATIVE MAP ☐
 COMMUNITY PLAN AMENDMENT ☐ SUBDIVISION MODIFICATION ☐
 REZONING ☐ ENVIRONMENTAL DET. ☐
 SPECIAL PERMIT ☐ OTHER _____
 VARIANCE ☐ _____

Recommendation:

☐ Favorable
☐ Unfavorable ☐ Petition ☐ Correspondence

LOCATION: So.atomas Business Park P-9114, P-9145, P-9137

| PROPOSERS | | |
|------------------------------|-------------------------------------|---------------------------|
| NAME | ADDRESS | ADDRESS |
| William Holliman | 555 Capitol Mall | Sacramento |
| John Diepenbrock | 455 Capitol Mall | Sacramento |
| Robert Bell | 555 Capitol Mall | Sacramento |
| Greg Rodgers (Lee Sammis Co) | 1451 River Park Dr. | Sacramento |
| Lee Sammis | 1451 River Park Dr. | Sacramento |
| | | |
| OPPONENTS | | |
| NAME | ADDRESS | ADDRESS |
| Robert Doyle | A. Natomas resident | P.O. Box 15362 Sacramento |
| Peta Saer | Save the American River Assoc. | |
| Rob McCray | Environmental Council of Sacramento | |
| Mary Elizabeth Alden | A. Natomas resident / MRC Assoc. | |
| Roy Trethoway | A. Natomas Community Assoc. | |

MOTION NO. _____

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|--------|----|--------|-----|
| Augusta | ✓ | | | |
| Fong | absent | | | |
| Goodin | | ✓ | | |
| Holloway | ✓ | | | |
| Larson | ✓ | | | ✓ |
| Muraki | ✓ | | | |
| Silva | ✓ | | ✓ | |
| Simpson | ✓ | | | |
| Hunter | ✓ | | | |

- ☐ TO APPROVE
☐ TO DENY
☐ TO APPROVE SUBJECT TO COND. & BASED ON FINDINGS OF FACT IN STAFF REPORT
☐ INTENT TO APPROVE SUBJ. TO COND. & BASED ON FINDINGS OF FACT DUE _____
☐ TO RECOMMEND APPROVAL _____ & FORWARD TO CITY COUNCIL
☐ TO RATIFY NEGATIVE DECLARATION
☐ TO CONTINUE TO _____ MEETING
☒ OTHER 1-2 mile P on west side only, re-
placement of housing on west side of main
drainage channel

SACRAMENTO CITY PLANNING COMMISSION

22423

MEETING DATE

4/29/82

GENERAL PLAN AMENDMENT

☐

TENTATIVE MAP

☐

ITEM NO.

2

FILE NO.

P

COMMUNITY PLAN AMENDMENT

☐

SUBDIVISION MODIFICATION

☐

REZONING

☐

ENVIRONMENTAL DET.

☐

SPECIAL PERMIT

☐

OTHER

VARIANCE

☐

Recommendation:

LOCATION:

S. Natomas peninsula, Parker R9114, P-9146, P-9317

☐ Favorable
 ☐ Unfavorable
 ☐ Petition
 ☐ Correspondence

NAME

PROPOSERS

ADDRESS

NAME

OPPOSERS

ADDRESS

MOTION NO.

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|-----|----|--------|-----|
| Augusta | ✓ | | ✓ | |
| Fong | ✓ | | | |
| Goodin | ✓ | | | |
| Holloway | ✓ | | | |
| Larson | ✓ | | | ✓ |
| Muraki | ✓ | | | |
| Silva | ✓ | | | |
| Simpson | ✓ | | | |
| Hunter | ✓ | | | |

- ☐ TO APPROVE
☐ TO DENY
☐ TO APPROVE SUBJECT TO COND. & BASED ON FINDINGS OF FACT IN STAFF REPORT
☐ INTENT TO APPROVE SUBJ. TO COND. & BASED ON FINDINGS OF FACT DUE
☐ TO RECOMMEND APPROVAL & FORWARD TO CITY COUNCIL
☐ TO RATIFY NEGATIVE DECLARATION
☐ TO CONTINUE TO MEETING
☒ OTHER reaffirm original position

that C Plan is sound & shouldn't be changed

CORRECTED STAFF REPORT, 4/27/82

City Planning Commission
Sacramento, California

Honorable Members in Session:

SUBJECT: The South Natomas Office Park Proposals

SUMMARY

On January 5, 1982, the City Council had two business park proposals before it--Natomas Eastside and Gateway Centre. That evening, the Council indicated, by a vote of eight-to-one, an intent to approve a modification of the South Natomas Community Plan subject to ten conditions. Among the conditions was the appointment of a task force to provide a forum for City Staff, representatives of the Council and applicants to address the motion. On January 19, 1982, the City Council directed staff to include Creekside Office Park in the January 5th motion and to set April 29th as the hearing date for all three business park projects at the City Planning Commission. On February 16, 1982, the City Council approved an initiation to request a rezoning to General Commerical (C-2) for Natomas Eastside, Gateway Centre, and Creekside Office Park.

The Task Force was not able to determine the amount nor the location of the potential office park. The applicants have indicated that the amount of office space must be established before quantification of the other conditions can be determined. City staff members of the Task Force determined that no more than 1.2 million square feet on the west side of I-5 or 1.5 million square feet cumulatively on both sides of I-5 could be allowed. The Planning staff recommends that if an office park is allowed in South Natomas that it be limited to no more than 1.2 million square feet on the west side of I-5.

BACKGROUND

On December 17, 1981, the City Planning Commission conducted a public hearing on two business park proposals--Natomas Eastside and Gateway Centre--located in the South Natomas Community Plan area. The Commission recommended that the Council certify the South Natomas Business Parks Final EIR and deny those entitlements not consistent with the General and Community Plans and the Natomas Oaks PUD. On January 5, 1982, the City Council certified the South Natomas Business Parks Final EIR and moved an intent to approve a modification of the South Natomas Community Plan subject to the conditions listed below.

1. Reduce the scope of the proposed office parks without destroying an office park concept.

2. Provide for a reasonable flow of traffic throughout the entire South Natomas Community Plan area with a goal of level of service C including but not limited to the Community Plan.
3. All necessary traffic improvements beyond those necessitated by the Community Plan are to be funded by the projects' applicants.
4. Provide for the installation and maintenance of both sides of the I-5 scenic corridor.
5. Explore conditions that would minimize office space competition with the Central Business District.
6. Explore assistance, including dedication and financial, by the applicants to provide for public service and capital expenditures in the South Natomas Community Plan area including, but not limited to, parks, a library and a community center.
7. Provide for the incursion of affordable housing especially senior citizen housing, either in the subject sites or elsewhere in the Community Plan area.
8. Provide for public transportation, including an annual payment to Regional Transit.
9. Implement, to the extent possible, the mitigation measures identified in the EIR.
10. Assemble a task force of City staff to meet with the applicants and interested parties to carry out the intent of the motion.

TASK FORCE

The task force, composed of representatives from the City Manager, City Planning, City Traffic Engineering, City Attorney and City Community Services Departments, Councilpersons Shore and Serna, met with the applicants (Enlow Ose, Lee Sammis and Angelo Tsakapolous) and their representatives and with Don Horel, a representative from the South Natomas Community, on a regular basis. Topics of discussion included traffic, revised land use proposals, and public service improvements. During these discussions the applicants presented revisions to their proposals.

The Natomas Eastside proposal originally requested 1.9 million square feet of office on 106 acres (17,925 sq. ft./acre). The applicant has submitted two revised proposals for the subject site (Exhibits L and M). One proposes 90 acres of office, the other proposes 91 acres. The alternatives represent a 15% reduction in acreage from the original proposal. No square footage estimate is given. However, if we use 17,000 square feet per acre, the square footage is 1.5+ million. Gateway Centre originally proposed 1.45 million square feet of office on 75 acres (19,333 sq. ft./acre) with an additional ten acres of commercial. The applicant's revised proposal (Exhibit N) indicates 1.0 million square feet of office on 60 acres (17,000 sq. ft./acre) with an additional 10 acres of support service commercial interspersed throughout the office park. The proposal represents a 20% reduction in acreage from the original proposal. Creekside Office Park originally and presently proposes 614,000 square feet of office on 52 acres (13,000 sq. ft./acre), although the schematic plan has been revised to include 4-story structures (Exhibit O).

If office land use is to be granted in South Natomas, the city staff members of the task force recommend that no more than 1.2 million square feet on the west side of I-5 or no more than 1.5 million square feet cumulatively on the east and west sides be allowed. This is based on the understanding that the office space would be at a density of 17,000 square feet per acre and would not provide for any other deviations such as increases in residential densities, additional intensive land uses or other employment land uses being allowed within the entire South Natomas Community Plan area. Until the amount and location of the office park is defined, it is difficult and premature to address the remaining conditions as well as agreements necessary to carry out the Council motion.

PLANNING STAFF EVALUATION

In response to the Council's direction on January 5th, staff has prepared a series of land use alternatives and a traffic analysis for the subject sites (Exhibits A through J). The alternatives range from 700,000 to 4.1 million square feet of office. A table comparing each alternative is provided (Exhibit K). Staff has also reviewed the applicants' revised proposals (Exhibits L through O). In all instances staff's concerns and comments regarding the alternatives are similar.

- Fiscal and Employment. The City recognizes that the office projects would result in a net increase in one-time revenues and that annual project revenues would exceed operating costs when compared with the Community Plan. The City also recognizes that the projects would generate both direct and indirect jobs.

- Residential Displacement. The greater the amount of office square footage, the greater the reduction in residential units in South Natomas. The 1978 South Natomas Community Plan was designed to provide close-in housing to the Central City employment center. The reduction in residential densities provided in South Natomas would offset the decrease. The residential displacement is compounded by the fact that the office park proposals will create a demand for additional housing. Due to sewerage and circulation system constraints, it may be difficult to make up the displaced units within the Community Plan area.
- Available Land for Office Development. Staff believes that there is sufficient land available for suburban office park developments in the City. Undeveloped parcels in Point West, Park Arden and Southwest Five alone can provide 2.0 million square feet of office. These sites are located in existing residentially developed or developing areas in the City and have freeway frontage.
- Growth-Inducing. The office parks will be growth inducing. As a result of the Natomas Eastside proposal, the City has already received three subsequent office park proposals. Staff is concerned that in the absence of physical barriers, there will be requests for expansion of office use on the subject sites as well as proposals for office square footage on new sites. For instance, allowing office use on the Creekside site will make residential development less desirable on the landlocked BD properties site to the west. Additionally, office related vehicles traveling through the undeveloped eighty-acre parcel to the east of the Creekside site will negatively impact residents.
- Traffic. The traffic studies conducted in the office park EIRs and supplemented by the City Traffic Engineer, suggest that the traffic congestion anticipated with the Community Plan is more severe than previously anticipated. According to the Traffic Study (Exhibit A) prepared by City Traffic Engineering, with all practical widening three intersections under the Community Plan will still be below level of Service "C". It would appear that the Community Plan area cannot accommodate any additional office square footage "without making the traffic problems worse than they will be with the community plan level of development."

Planning staff is reluctant to recommend for office parks in South Natomas for the following reasons: the Community Plan area is developing as designated, residential displacement will occur, there is available square footage and land within the City for suburban office park users, the projects will have growth inducing impacts, the circulation system in South Natomas is constrained, there are forthcoming projects in the Community Plan area, and there is a history of repeated requests for more intense density after the approval of office development. However, if the City is compelled to allow office development in South Natomas, staff recommends that the office park square footage be limited to 1.2 million square feet on 70 acres on the west side of I-5. This amount can be accommodated by the circulation system subject to physical improvements. By placing office development as indicated on Exhibit D, the concept of one cohesive office park providing freeway exposure can be achieved. Staff wishes to make it clear that this density of development allows for no further deviation from the Community Plan. No additional intensive uses, including additional office/commercial development and increased residential densities, can be accommodated. Staff recommends that the remaining conditions of the January 5, 1982 motion be addressed subsequent to determination of the amount and location of office park square footage.

STAFF RECOMMENDATION

Staff recommends that the City Planning Commission, as requested by the City Council's directive, recommend the following:

1. that 1.2 million square feet of office on the west side of I-5 as shown on Exhibit D and specific acreages be approved in concept only;
2. that it be understood that this intensity of development allows for no further deviation to more intense uses throughout the entire South Natomas Community Plan area;
3. that the remaining conditions of the January 5, 1982, motion be addressed after the amount of and the location of the office park square footage is determined; and
4. that the applicants be directed to return to the Planning Commission with a more detailed schematic plan for all land uses on the subject site(s) reflecting the Council's forthcoming action and with PUD guidelines.

DP:CC:dgh:lo

SOUTH NATOMAS TRAFFIC STUDY

PREPARED BY:

CITY OF SACRAMENTO

Engineering Department

Traffic Engineering Division

APRIL 1982

SOUTH NATOMAS TRAFFIC

The Traffic Engineering Division made a cursory analysis of projected traffic for the South Natomas area at the time the Community Plan was being developed. Based on these projections and the physical constraints of the existing street system, we made proposals for street widths and numbers of lanes on the approaches to all major intersections. We knew at the time that the proposed streets would not be adequate to accomodate the traffic, and we anticipated a fair amount of congestion in the area. Many of the streets had already been built and there was existing development along several major streets that made it impractical to consider extensive street widening projects.

When the travel analysis was made for the environmental reports associated with the proposed office developments, we discovered that we had previously underestimated the traffic in and around South Natomas. We now find that traffic conditions, upon full development of the area, will be much worse than had been previously estimated. The volume of traffic now estimated for the intersection of El Camino Avenue and Northgate Boulevard is in the realm of "impossible" traffic flow. The anticipated volume on the northbound off-ramps from I-5 at El Camino Avenue and Garden Highway are also "impossible" volumes. The greatest problems however, will occur on El Camino Avenue east of Northgate Boulevard and on Northgate Boulevard south of Garden Highway.

In real life, "impossible" traffic flows never really materialize. As time goes by and traffic volumes increase, people begin to change their patterns to accomodate the situation. Some will choose other routes to avoid congestion, some will travel earlier or later, some will switch from automobiles to buses, and

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some will change their place of residence or employment to avoid the congestion. As conditions reach an extreme, new developments are suppressed in the area so full build-out is not realized. While all of these adjustments tend to avoid "impossible" traffic conditions, they can drastically reduce the quality of life in an area.

Any amount of additional development above that outlined in the Community Plan will make conditions worse than described above unless the proposed population is reduced proportionately. Adding office development to a dense residential area increases the traffic but does not necessarily result in a proportionate aggravation of traffic congestion. The general characteristic of traffic flows associated with a residential area is a high outbound flow in the morning and a high inbound flow in the afternoon peak hours. Office development creates the opposite direction of flow and the traffic generated by the offices could occupy otherwise unused capacity on the street system. However, to the extent that through traffic in one direction interferes with left turns in the opposite direction, the addition of office development will contribute directly to the congestion anticipated from community plan levels of development.

Level of Service

Traffic congestion (or lack of it) at an intersection is a function of the traffic carrying capacity of the intersection approach lanes and the volume of traffic flowing through the intersection. As the volume approaches capacity during the peak hour of flow, congestion and delay begin to appear. In addition to irritating motorists, congestion wastes energy and damages air quality.

A set of alphabetical designations have been developed to describe volume to capacity ratios or levels of traffic service. An "A" designation for an inter-

section means the volume is well below the capacity and travel is free flowing. An "E" designation means the volume exceeds the capacity and vehicles are subjected to considerable delay during the peak hours. Level of service "C" is used to evaluate the effects of projected future traffic. Some arguments have been presented that level of service "D" is good enough. However, traffic projection is a very inexact science and using the "D" level could easily result in "E" level conditions in the future.

Major Intersection Problems

Table 1 shows the afternoon peak hour level of service at each major intersection based on Community Plan traffic volumes (no additional office). The first columns show the level of service with the geometric improvements previously anticipated. The second set of columns show the level of service with additional street widening, prohibition of parking at some locations and elimination of bike lanes at some locations. The additional widening will require the acquisition of additional right-of-way but no widening is proposed that would require demolition of existing buildings.

It can be seen that even with all practical widening three intersections will still be below level of service "C". Therefore, the answer to the question of how much additional office can be accommodated and still maintain level of service "C" at all intersections is none.

The levels of service shown in Table 1 are based on the raw traffic projections produced by the computer. Further analysis and adjustment could mitigate some of the problems indicated. Although the intersection of El Camino Avenue and Azevedo Drive is shown at level "D", it is very close to "C" and should not be a great problem. The intersection of Garden Highway and Truxel Road will definitely be a problem but it is not expected to be an "impossible" situation like

Table 1

APPROACH LANES AND LEVELS OF SERVICE
WITH COMMUNITY PLAN CONDITIONS

| <u>Intersection</u> | <u>Previously Proposed Approach Lanes</u> | <u>Level of Service</u> | <u>New Proposal for Approach Lanes</u> | <u>Level of Service</u> |
|--------------------------|---|-------------------------|--|-----------------------------|
| Garden & Orchard | 5 | (1) | 5 | (1) |
| Garden & Natomas Oaks | 9 | A | 9 | A |
| Garden & I-5 W. Ramp | 8 | E | 10 | C |
| Garden & I-5 E. Ramp | 8 | E | 11 | B |
| Garden & Truxel | 8 | E | 10 | E |
| Garden & Northgate | 6 | E | 13 | C |
| El Camino & Orchard | 12 | A | 12 | A |
| El Camino & Natomas Oaks | 16 | B | 16 | B |
| El Camino & I-5 Ramp | 7 | D | 9 | B |
| El Camino & Azevedo | 15 | D | 15 | D |
| El Camino & Truxel | 16 | C | 16 | C |
| El Camino & Northgate | 12 | E | 14 | E |
| San Juan & Azevedo | 9 | (1) | 9 | (1) |
| San Juan & Truxel | 16 | (1) | 16 | (1) |
| San Juan & Northgate | 14 | (1) | 14 | (1) |

(1) The consultant did not compute the level of service at these locations.

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TABLE 1

El Camino Avenue and Northgate Boulevard. Because of existing development on El Camino Avenue and on Northgate Boulevard, it is not practical to consider any further widening at this location. The problem at Garden Highway and Truxel Road could be mitigated by constructing an additional road between El Camino Avenue and Garden Highway parallel to Truxel Road. However, such a roadway could have a serious adverse impact on land development because of the need to elevate up to the top of the levy to connect to Garden Highway. This additional road has been recommended by the consultant for the proposed Creekside Development.

Other Traffic Problems

Table 1 only shows the projected conditions at the major intersections in the South Natomas area. Problems have been found at four other locations as follows:

Northbound I-5 Ramps - The absolute maximum northbound traffic that can exit from the freeway at Garden Highway and at El Camino Avenue is 2,000 vehicles per hour. The projections are for 2,239 vehicles per hour at Garden Highway and 2,423 at El Camino Avenue. The result will probably be that many people will continue around to the I-880 interchange at El Camino Avenue which should be relatively free flowing.

El Camino East of Northgate - El Camino Avenue is only a two lane residential street between Northgate Boulevard and Del Paso Boulevard. In Addition there is a busy mainline railroad grade crossing that frequently disrupts traffic. The present traffic volume on El Camino is 15,000 vehicles per day and the projection is 28,000 vehicles per day upon build-out of South Natomas. This street is already strained to the limit with the existing traffic and it would be "impossible" for it to accomodate 28,000 vehicles per day.

Northgate Between Garden Highway & Route 160 - Although Northgate Boulevard can be expanded to a six lane street at Garden Highway it narrows to two lanes where it connects to Route 160. In addition the street frequently floods in the winter and must be closed. The traffic projection for build-out of South Natomas shows 42,000 vehicles per day on Northgate south of Garden Highway which greatly exceeds the volume that can be accommodated at it's junction with Route 160.

Improvement Costs

Very preliminary estimates of the cost to improve the major intersections in South Natomas have been made based on the cost of the recent improvements at Fair Oaks and Howe. These estimates do not include right-of-way nor the extra cost of land fill along Garden Highway. They are only intended to give an order of magnitude cost for traffic improvements. The costs based on the number of approach lanes to be constructed at each intersection are shown in Table 2.

Approximately \$4,500,000 of the intersection improvement costs will be paid by the developers of adjacent lands as they construct the frontage improvements. In the undeveloped areas the developers will also contribute the necessary right-of-way. The developers will also contribute about \$10,000,000 to the major street construction fund which will help pay some of the costs.

All of the above only covers the improvements within the South Natomas area. Additional improvements will be needed on the border and just outside of the area that will cost millions of dollars. These improvements are as follows:

Truxel Road & I-880 - A two lane bridge exists across I-880 at the prolongation of Truxel Road. In order to accommodate the South Natomas traffic a diamond interchange will be needed and the existing bridge will need to be wid-

Table 2

INTERSECTION WIDENING COSTS

| <u>Intersection</u> | <u>Additional Approach Lanes</u> | <u>Estimated Improvement Costs</u> |
|--------------------------|--------------------------------------|--|
| Garden & Orchard | 2 | \$ 360,000 |
| Garden & Natomas Oaks | 3 | 540,000 |
| Garden & I-5 West Ramp | 2 | 360,000 |
| Garden & I-5 East Ramp | 3 | 540,000 |
| Garden & Truxel | 6 | 1,080,000 |
| Garden & Northgate | 7 | 1,260,000 |
| El Camino & Orchard | 9 | 1,620,000 |
| El Camino & Natomas Oaks | 14 | 2,520,000 |
| El Camino & I-5 Ramp | 2 | 360,000 |
| El Camino & Azevedo | 7 | 1,260,000 |
| El Camino & Truxel | 9 | 1,620,000 |
| El Camino & Northgate | 2 | 360,000 |
| San Juan & Azevedo | 7 | 1,260,000 |
| San Juan & Truxel | 10 | 1,800,000 |
| San Juan & Northgate | <u>12</u> | <u>2,160,000</u> |
| Total | 95 | \$17,100,000 |

ened to four lanes. The estimated cost would be about \$4,000,000.

El Camino Avenue East of Northgate - As stated before this two lane road can not accomodate the projected traffic.

A study was made in 1979 to determine the cost of various alternative solutions to this problem. The most practical seemed to be to build a new road connecting Garden Highway with Arden Way, the cost was estimated to be over \$6,000,000.

Northgate Boulevard South of Garden Highway - A project was identified in the 1979 report that included making Northgate an all weather route, improving the connection with Route 160 and improving the connection with the south end of Del Paso Boulevard. The total cost estimate was over \$6,000,000.

Based on the above estimates the total cost for the necessary traffic improvements to serve the South Natomas Community Plan would be about \$33,000,000. About \$4,500,000 would be contributed by frontage improvements and about \$10,000,000 would be derived from the Major Street Construction Tax. This leaves a shortfall of about \$18,500,000.

Additional Office Development

Several other reports describe the office development proposals for South Natomas. There are a number of issued involved but this report is limited to the traffic impacts.

Table 3 presents the square feet of office development contained in the alternatives considered for the analysis of traffic impacts. A complete computer traffic analysis was performed on Alternatives 2, 4 and 6. Traffic volumes generated

Table 3

Proposed Office Alternatives

| <u>Office Park</u> | <u>Alt #1</u> | <u>Alt #2</u> | <u>Alt #3</u> | <u>Alt #4</u> | <u>Alt #5</u> | <u>Alt #6</u> |
|--------------------|---------------|---------------|---------------|---------------|---------------|----------------|
| <u>West of I-5</u> | | | | | | |
| Natomas Eastside | 0 | 712,500 | 855,431 | 712,500 | 1,235,000 | 1,515,000 |
| Gateway Center | 0 | 543,700 | 652,769 | 543,700 | 945,000 | 1,200,000 |
| <u>East of I-5</u> | | | | | | |
| Creekside | 614,000 | 0 | 0 | 252,000 | 0 | 614,000 |
| B. D. Properties | <u>0</u> | <u>0</u> | <u>0</u> | <u>0</u> | <u>0</u> | <u>117,574</u> |
| TOTAL | 614,000 | 1,256,200 | 1,508,200 | 1,508,200 | 2,180,000 | 3,446,574 |

by the other alternatives were developed by proportioning traffic from combinations of Alternatives 2, 4 and 6.

Table 4 shows the total peak hour traffic volumes at each intersection for each alternative upon full build-out of the South Natomas area. With a couple of exceptions every alternative office development produces higher volumes than the community plan. Table 5 shows the same information in percentage form. There are 19 entries in the table where the office developments increase the traffic by more than 25 percent.

Table 6 shows the peak hour traffic volumes at the other locations identified as problems earlier in this report. It can be seen that additional office development increases the projected volumes in most cases. The main exception is at the I-5 Off Ramp at Garden Highway.

The consultants calculated the level of traffic service at selected intersections based on the number of lanes previously planned. They did this for the Community Plan development and a couple of office park alternatives. City staff adjusted these levels of service to take additional lanes into account and estimated the values for additional alternatives by proportion. Table 7 shows the resulting alphabetical levels of service.

As previously mentioned in this report, a level of service of "C" is considered acceptable and levels of "D" and "E" are not. The summary at the bottom of the table shows that every alternative has more D's and E's than the Community Plan.

The main purpose of Tables 4 through 7 is to show the relative impact of the various alternatives. The results shown are taken from raw unadjusted computer projections of future traffic. Conditions may turn out to be better or worse at

Table 4.

Peak Hour Intersection Volumes

| <u>Intersection</u> | <u>Community Plan</u> | <u>Alt #1</u> 614,000 sq. ft. East Side | <u>Alt #2</u> 1,256,200 sq. ft. West Side | <u>Alt #3</u> 1,508,200 sq. ft. West Side | <u>Alt #4</u> 1,508,200 sq. ft. Both Sides | <u>Alt #5</u> 2,180,000 sq. ft. West Side | <u>Alt #6</u> 3,446,574 sq. ft. Both Sides |
|--------------------------|-----------------------|--|--|--|---|--|---|
| Garden & Orchard | 1,447 | 1,444 | 1,442 | 1,443 | 1,444 | 1,444 | 1,442 |
| Garden & Natomas Oaks | 2,623 | 2,611 | 3,502 | 3,678 | 3,497 | 4,120 | 4,448(1) |
| Garden & I-5 W. Ramp | 3,717 | 3,717 | 4,600 | 4,777 | 4,600 | 5,211 | 5,529(1) |
| Garden & I-5 E. Ramp | 4,443 | 4,460 | 5,017 | 5,132 | 5,010 | 5,332 | 5,433 |
| Garden & Truxel | 4,544 | 4,618 | 4,842 | 4,902 | 4,914 | 4,980 | 5,074 |
| Garden & Northgate | 5,879 | 6,037 | 6,181 | 6,242 | 6,246 | 6,338 | 6,557 |
| El Camino & Orchard | 1,293 | 1,308 | 1,646 | 1,717 | 1,652 | 1,965 | 2,220(1) |
| El Camino & Natomas Oaks | 2,596 | 2,643 | 3,253 | 3,385 | 3,258 | 3,512 | 3,514(1) |
| El Camino & I-5 Ramp | 4,171 | 4,650 | 4,414 | 4,662 | 4,611 | 4,491 | 5,016(1) |
| El Camino & Azevedo | 3,475 | 4,035 | 3,703 | 3,749 | 3,933 | 3,784 | 4,418 |
| El Camino & Truxel | 3,623 | 3,852 | 3,973 | 4,043 | 4,067 | 4,119 | 4,377 |
| El Camino & Northgate | 6,637 | 6,724 | 7,017 | 7,093 | 7,053 | 7,251 | 7,448 |
| San Juan & Azevedo | 502 | 502 | 502 | 502 | 502 | 502 | 502 |
| San Juan & Truxel | 3,775 | 3,924 | 3,894 | 3,918 | 3,955 | 3,972 | 4,186 |
| San Juan & Northgate | 3,695 | 3,889 | 3,814 | 3,858 | 3,946 | 3,811 | 3,960 |

(1) - Morning peak hour. All others are afternoon peak hour.

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Total 11

Table 5

Percent of Traffic Attributable to Office Development

| <u>Intersection</u> | <u>Alt #1</u> 614,000 sq. ft. East Side | <u>Alt #2</u> 1,256,200 sq. ft. West Side | <u>Alt #3</u> 1,508,200 sq. ft. West Side | <u>Alt #4</u> 1,508,200 sq. ft. Both Sides | <u>Alt #5</u> 2,180,000 sq. ft. West Side | <u>Alt #6</u> 3,446,574 sq. ft. Both Sides |
|--------------------------|--|--|--|---|--|---|
| Garden & Orchard | -0.2 | -0.2 | -0.2 | -0.2 | -0.2 | -0.3 |
| Garden & Natomas Oaks | -0.5 | 33.5 | 40.2 | 33.3 | 57.1 | 69.6 |
| Garden & I-5 W. Ramp | 0.0 | 23.8 | 28.5 | 23.8 | 40.2 | 48.7 |
| Garden & I-5 E. Ramp | 0.4 | 12.9 | 15.5 | 12.8 | 20.0 | 22.3 |
| Garden & Truxel | 1.6 | 6.6 | 7.9 | 8.1 | 9.6 | 11.7 |
| Garden & Northgate | 2.7 | 5.1 | 6.1 | 6.2 | 7.8 | 11.5 |
| El Camino & Orchard | 1.2 | 27.3 | 32.8 | 27.8 | 52.0 | 71.7 |
| El Camino & Natomas Oaks | 1.8 | 25.3 | 30.4 | 25.5 | 35.3 | 35.4 |
| El Camino & I-5 Ramp | 11.5 | 5.8 | 11.8 | 10.6 | 7.8 | 20.3 |
| El Camino & Azevedo | 16.1 | 6.6 | 7.9 | 13.2 | 8.9 | 27.1 |
| El Camino & Truxel | 6.3 | 9.7 | 11.6 | 12.3 | 13.7 | 20.8 |
| El Camino & Northgate | 1.3 | 5.7 | 6.9 | 6.3 | 9.2 | 12.2 |
| San Juan & Azevedo | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| San Juan & Truxel | 3.9 | 3.1 | 3.8 | 4.8 | 5.2 | 10.9 |
| San Juan & Northgate | 5.2 | 3.2 | 4.4 | 6.8 | 3.1 | 7.2 |
| Average | 3.8 | 10.3 | 12.7 | 12.0 | 16.0 | 22.3 |

Table 6

Peak Hour Volumes At Problem Locations

| <u>Condition</u> | <u>El Camino East of Northgate</u> | <u>Northgate South of Garden Hwy</u> | <u>Garden And I-5 Off Ramp</u> | <u>El Camino And I-5 Off Ramp</u> |
|------------------|--|--|--|---|
| Community Plan | 3,122 | 4,556 | 2,239 | 2,423 |
| Alt #1 | 3,219 | 4,614 | 2,230 | 2,589 |
| Alt #2 | 3,488 | 4,629 | 2,237 | 2,433 |
| Alt #3 | 3,661 | 4,643 | 2,236 | 2,516 |
| Alt #4 | 3,528 | 4,653 | 2,233 | 2,501 |
| Alt #5 | 3,718 | 4,621 | 2,166 | 2,352 |
| Alt #6 | 3,909 | 4,631 | 2,056 | 2,431 |

Table 7

Traffic Level of Service With Community Plan
and Various Office Alternatives

| | | <u>Alt #1</u> | <u>Alt #2</u> | <u>Alt #3</u> | <u>Alt #4</u> | <u>Alt #5</u> | <u>Alt #6</u> |
|--------------------------|-----------------------|--|--|--|---|--|---|
| | <u>Community Plan</u> | 614,000 sq. ft. <u>East Side</u> | 1,256,200 sq. ft. <u>West Side</u> | 1,508,200 sq. ft. <u>West Side</u> | 1,508,200 sq. ft. <u>Both Sides</u> | 2,180,000 sq. ft. <u>West Side</u> | 3,446,574 sq. ft. <u>Both Sides</u> |
| <u>Intersection</u> | | | | | | | |
| Garden & Natomas Oaks | A | A | C | C | C | D | D |
| Garden & I-5 W. Ramp | C | C | E | E | E | E | E |
| Garden & I-5 E. Ramp | B | B | C | C | C | C | C |
| Garden & Truxel | E | E | E | E | E | E | E |
| Garden & Northgate | C | C | C | C | D | D | D |
| El Camino & Orchard | A | A | A | A | A | A | A |
| El Camino & Natomas Oaks | B | B | C | C | C | D | D |
| El Camino & I-5 Ramp | B | B | B | B | B | B | C |
| El Camino & Azevedo | D | E | D | D | D | D | E |
| El Camino & Truxel | C | D | D | D | D | D | D |
| El Camino & Northgate | E | E | E | E | E | E | E |
| D's | 1 | 1 | 2 | 2 | 3 | 5 | 4 |
| E's | 2 | 3 | 3 | 3 | 3 | 3 | 4 |

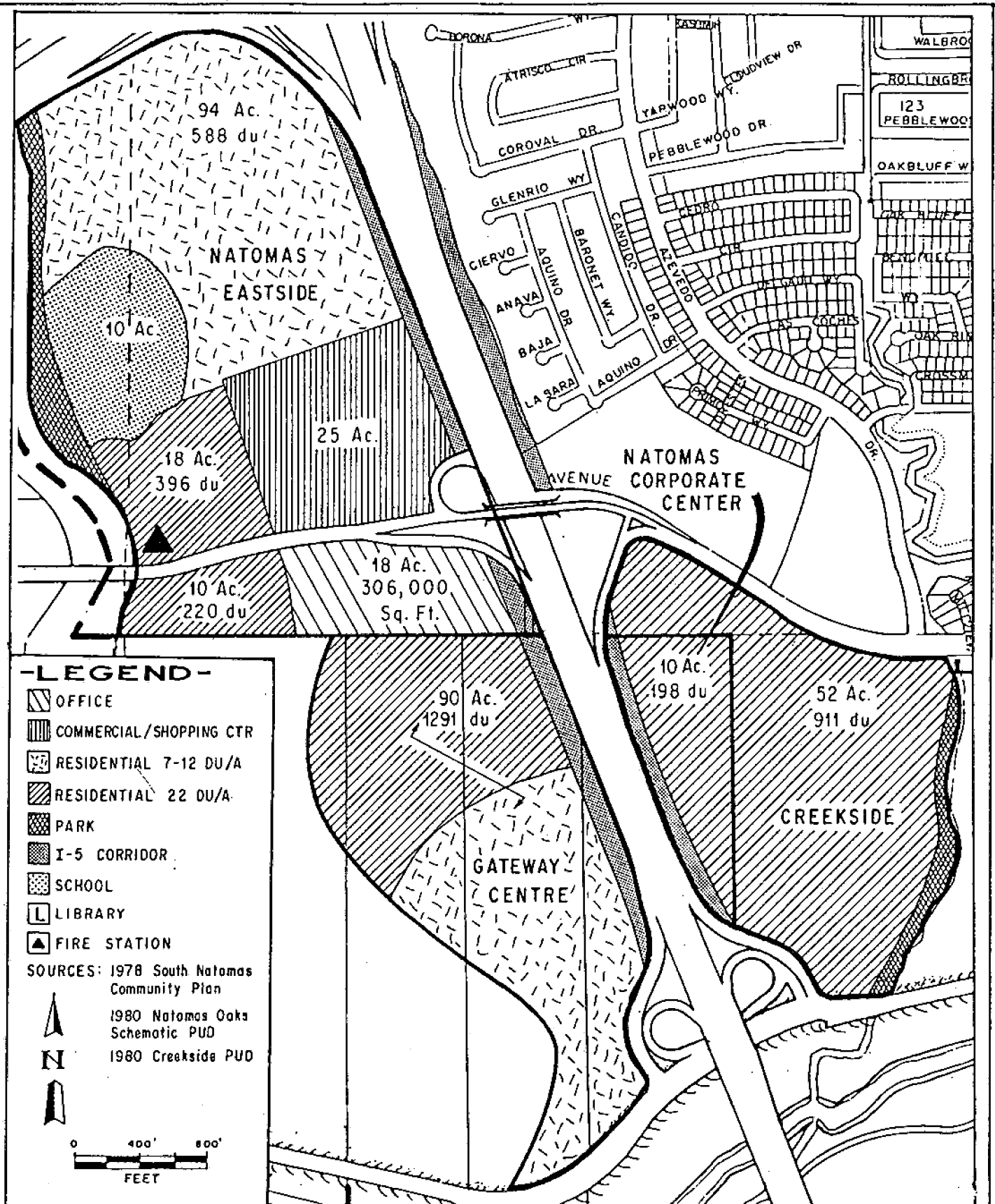
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at individual intersections but the overall results for the area as a whole can be considered fairly reliable.

Conclusion

Full build-out of the South Natomas Community Plan will result in serious traffic problems at many locations. The cost to correct the problems at most locations will be in the neighborhood of 30 to 35 million dollars. About 14 to 15 million dollars can be expected from the developers in the form of frontage improvements and contributions to the Major Street Construction Tax.

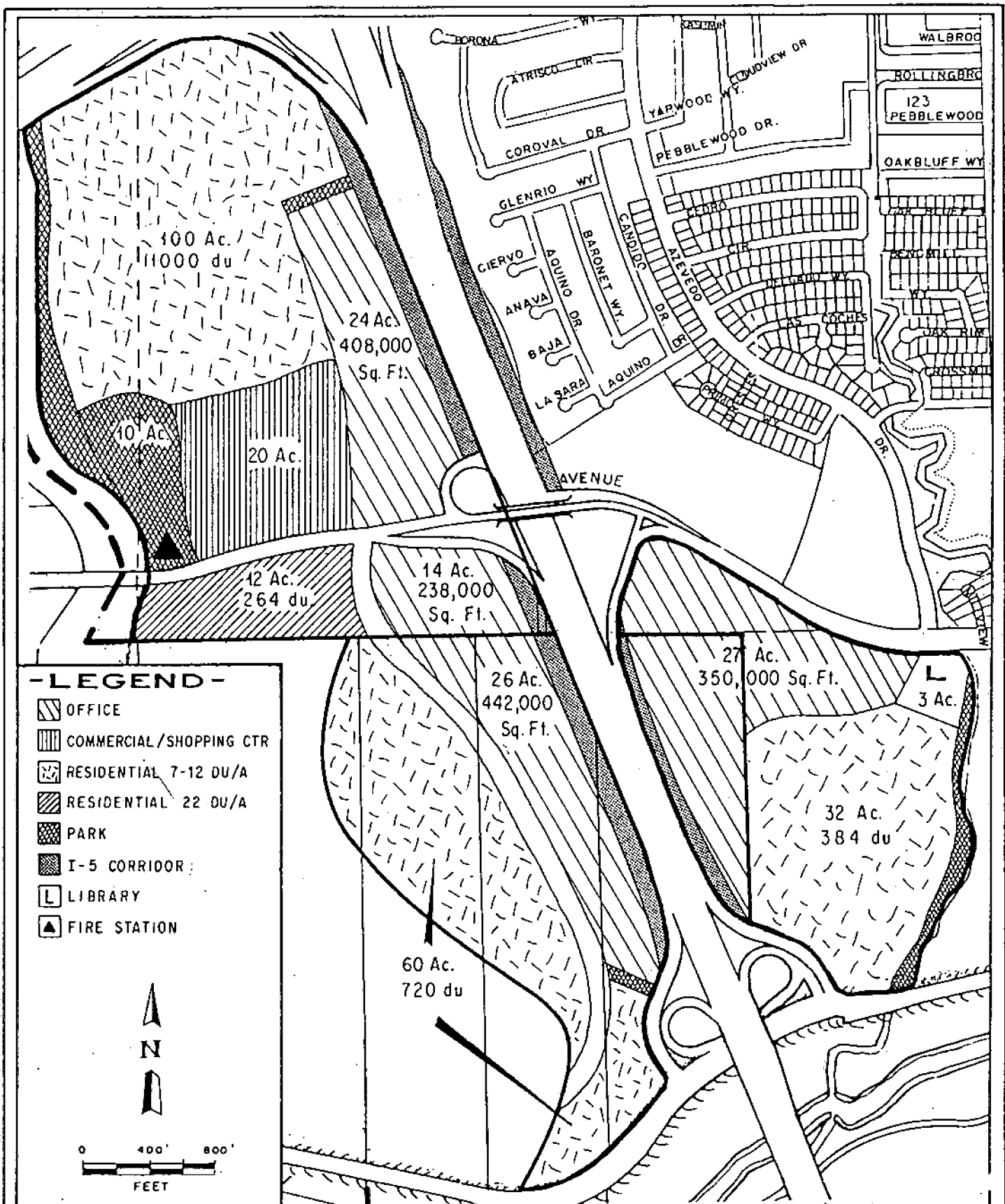
Based on the alternatives studied, any amount of additional office development in the South Natomas area will make the traffic problems worse than they will be with the community plan level of development.



COMMUNITY PLAN LAND USES





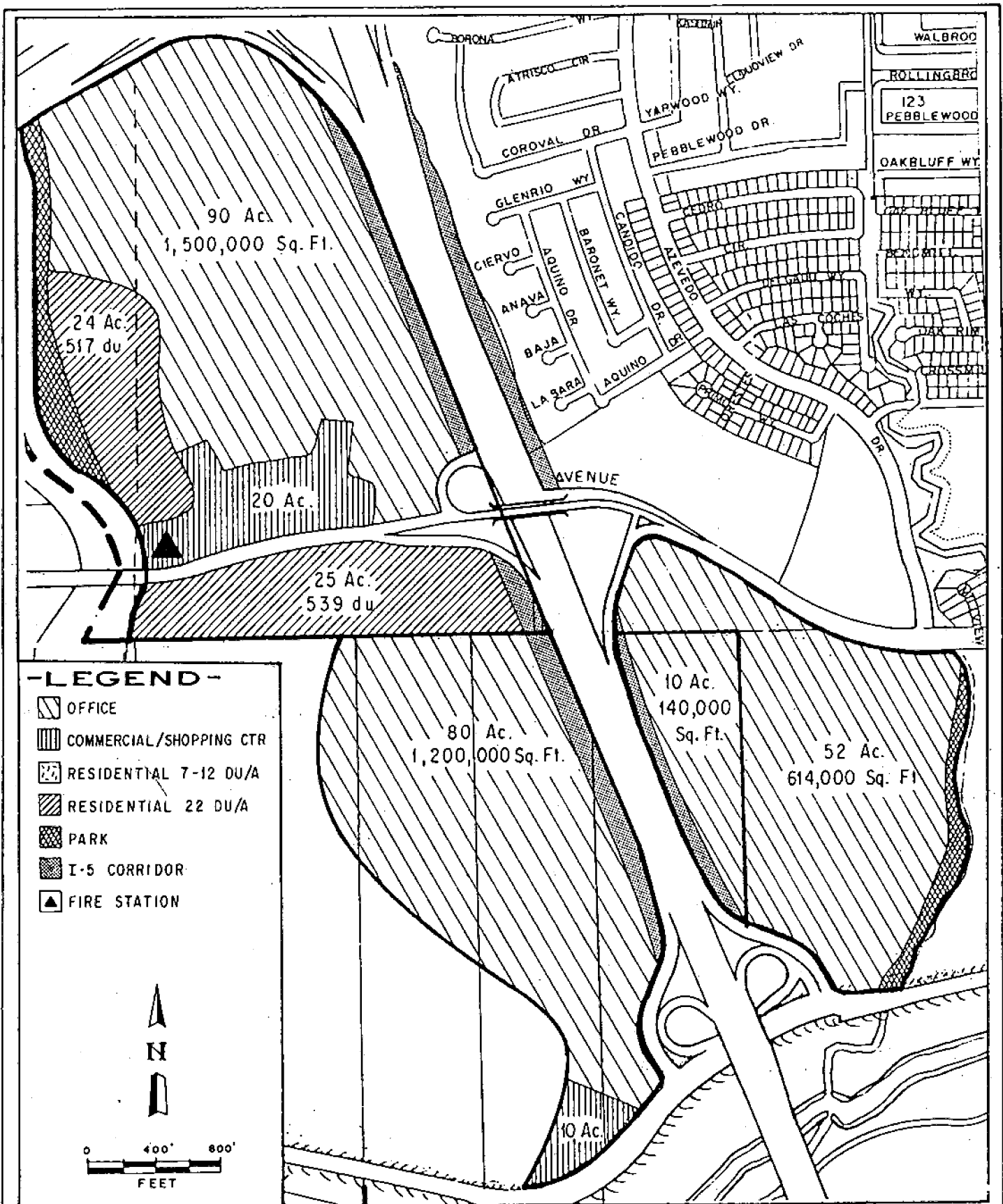


**REVISED 1.5 MILLION SQUARE
FEET OFFICE ALTERNATIVE**



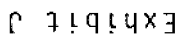






**3.4 MILLION SQUARE FEET
OFFICE ALTERNATIVE**

22433



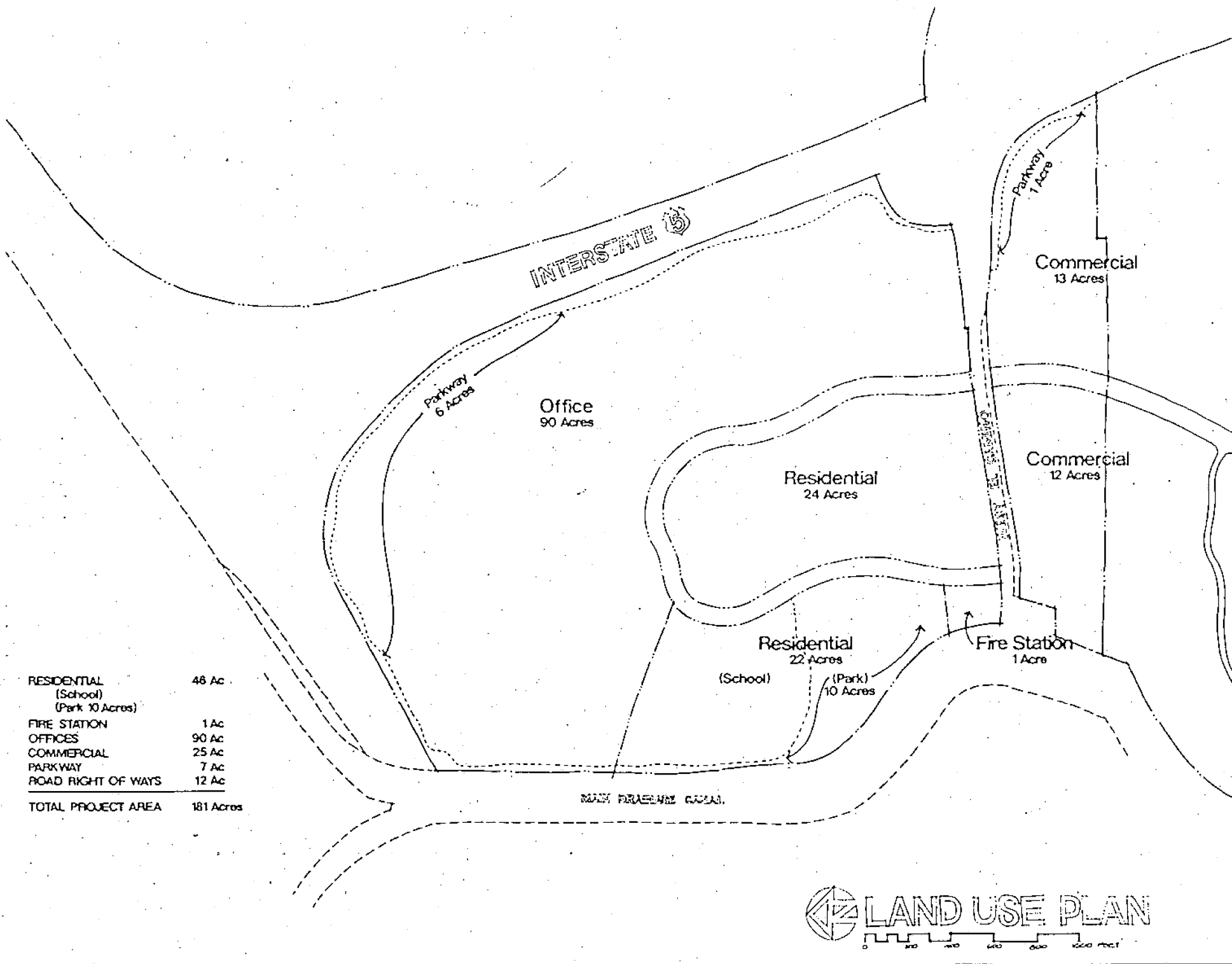
SOUTH NATOMAS OFFICE PARK ALTERNATIVES

| PROJECT/OFFICE SIZE IN MILLION SQ. FT. & LOCATION | COMMUNITY PLAN | 0.7 WEST | 1.2 WEST | 1.5 BOTH | 1.7 BOTH | 2.2 WEST | 2.9 BOTH | 3.4 BOTH | 4.2 BOTH |
|--|-------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Natomas Eastside | | | | | | | | | |
| Residential-Total | 1204 | 1312 | 1260 | 1264 | 1192 | 1036 | 1036 | 1056 | |
| Low-7 av du | 588 | 616 | | 280 | 280 | | | | |
| Medium-12 av du | | 432 | 996 | 720 | 648 | 772 | 772 | 517 | |
| High-22 av du | 616 | 264 | 264 | 264 | 264 | 264 | 264 | 539 | 468 |
| Office-1000 sq. ft. | 306 | 450 | 697 | 646 | 748 | 1190 | 1190 | 1500 | 1900 |
| Commercial-GAC | 25 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 31 |
| Gateway Centre | | | | | | | | | |
| Residential-du | | | | | | | | | |
| Medium-12 av | 1291 | 900 | 756 | 720 | 720 | 330 | 330 | | |
| Office-1000 sq. ft. | | 255 | 493 | 442 | 442 | 1020 | 1020 | 1200 | 1500 |
| Commercial-GAC | | | | | | 10 | 10 | 10 | 10 |
| Creekside | | | | | | | | | |
| Residential-du | | | | | | | | | |
| Medium-12 av | | | | 384 | 384 | | | | |
| High-22 av | 911 | 911 | 911 | | | 911 | | | |
| Office-1000 sq. ft. | | | | 221 | 289 | | 540 | 614 | 614 |
| Natomas Corp Center | | | | | | | | | |
| Residential-du | | | | | | | | | |
| High-22 av | 198 | 198 | 198 | | | 198 | | | |
| Office-1000 sq. ft. | | | | 130 | 170 | | 100 | 117 | 140 |
| Total Residential Units | 3604 | 3321 | 3125 | 2368 | 2296 | 2475 | 1366 | 1056 | 468 |
| Displace Units -% | | 283-8% | 479-13% | 1236-34% | 1308-36% | 1129-31% | 2238-62% | 2548-71% | 3136-87% |
| Traffic LOS at 11 Intersections | | | | | | | | | |
| D's | 1 | NC | 2 | 3 | NC | 5 | NC | 4 | NC |
| E's | 2 | | 3 | 3 | | 3 | | 4 | |

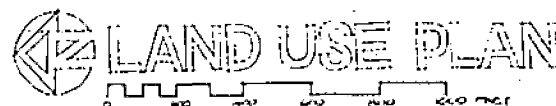
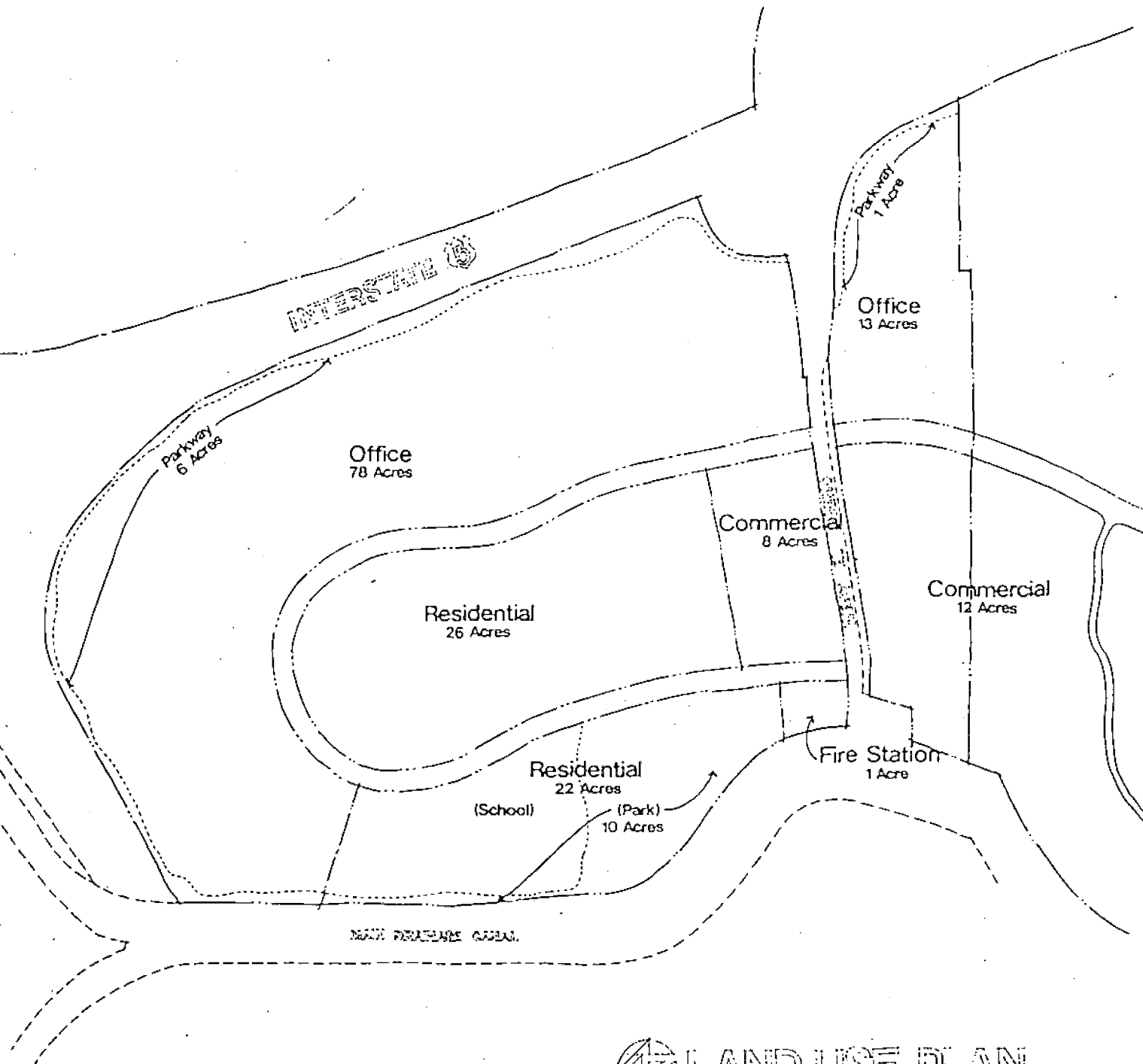
LEGEND: av = minimum average density du = dwelling unit GAC = gross acres LOS = level of service
 NC = not calculated

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| | |
|--|------------------|
| RESIDENTIAL (School) (Park 10 Acres) | 46 Ac |
| FIRE STATION | 1 Ac |
| OFFICES | 90 Ac |
| COMMERCIAL | 25 Ac |
| PARKWAY | 7 Ac |
| ROAD RIGHT OF WAYS | 12 Ac |
| TOTAL PROJECT AREA | 181 Acres |



| | |
|--------------------|-----------|
| RESIDENTIAL | 48 Ac |
| (School) | |
| (Park 10 Acres) | |
| FIRE STATION | 1 Ac |
| OFFICES | 91 Ac |
| COMMERCIAL | 20 Ac |
| PARKWAY | 7 Ac |
| ROAD RIGHT OF WAYS | 14 Ac |
| TOTAL PROJECT AREA | 181 Acres |



22423

92+23

Exhibit N

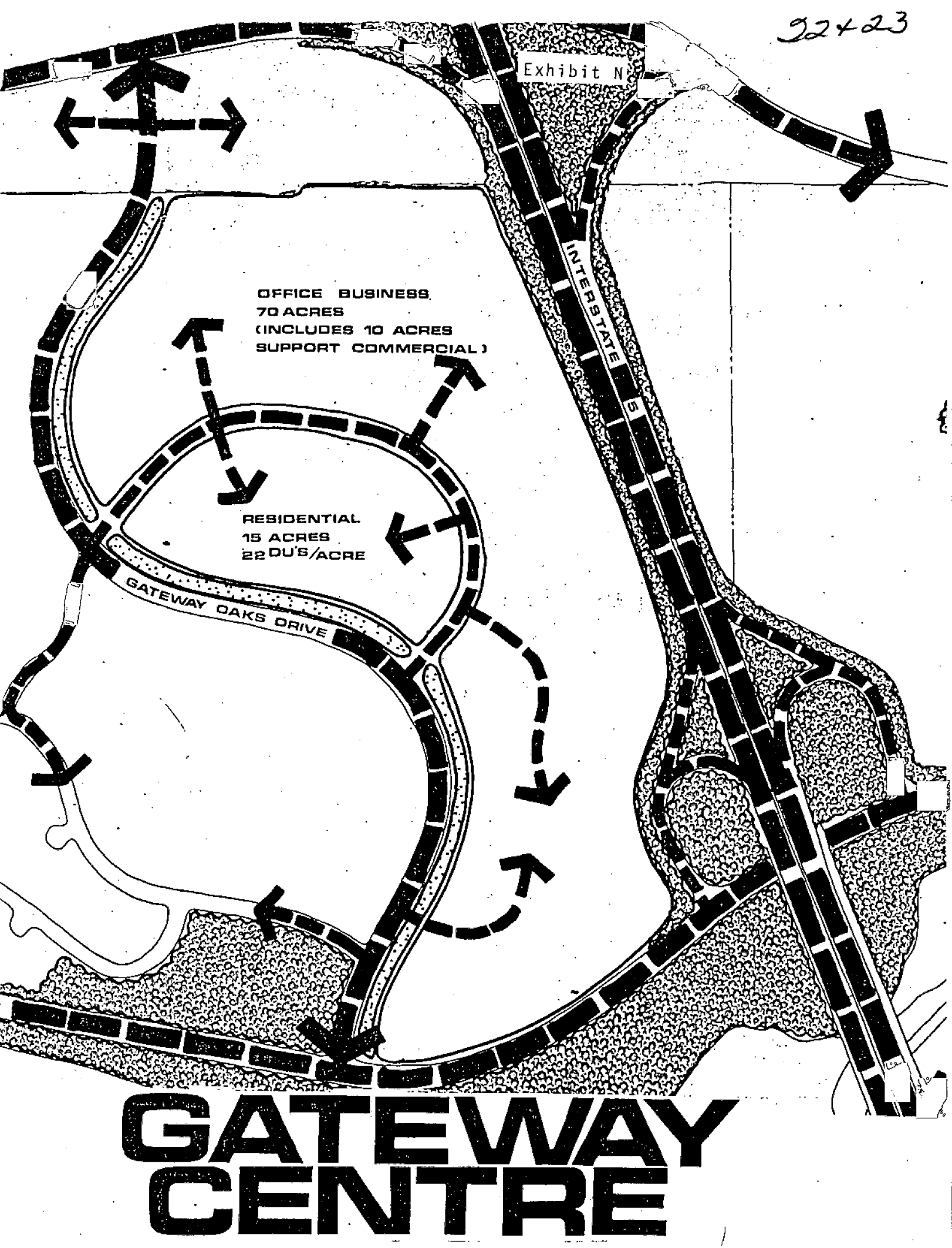
OFFICE BUSINESS
70 ACRES
(INCLUDES 10 ACRES
SUPPORT COMMERCIAL)

RESIDENTIAL
15 ACRES
22 DUBS/ACRE

GATEWAY OAKS DRIVE

INTERSTATE
5

GATEWAY CENTRE



SCHEMATIC DEVELOPMENT PLAN

CREEKSIDA OFFICE PARK

CITY OF SACRAMENTO CALIFORNIA

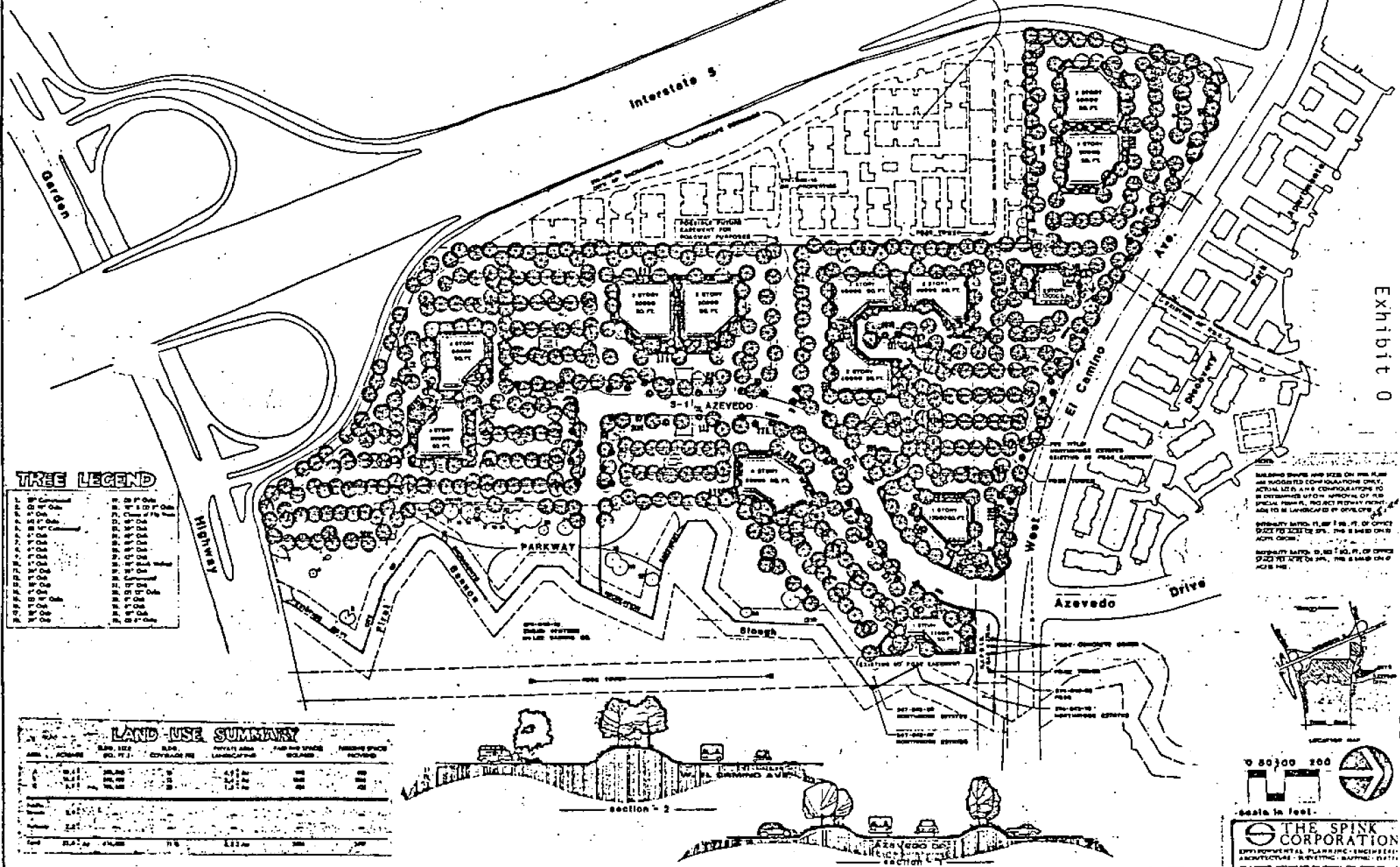


Exhibit 0

22423

11



CITY OF SACRAMENTO

~~16-17~~ ~~12-13~~
~~23-24~~

CITY PLANNING DEPARTMENT
927 TENTH STREET
SUITE 300
SACRAMENTO, CA 95814
TELEPHONE (916) 449-5604

MARTY VAN DUYN
PLANNING DIRECTOR

December 28, 1981

APPROVED
BY THE CITY COUNCIL

FEB 2 1982

OFFICE OF THE
CITY CLERK

*Cont. to
2-9-82*

City Council
Sacramento, California

Honorable Members in Session:

SUBJECT: South Natomas Business Park Proposals

SUMMARY

The Final EIR and project applications for the South Natomas Business Parks are set for hearing by the City Council on January 5, 1982. The first item that should be considered is the Final EIR.

On October 1, 1981, the Planning Commission reviewed the Draft Environmental Impact Report (DEIR) and forwarded it to the Environmental Coordinator for preparation of the Final EIR (FEIR). The FEIR consists of the Draft EIR and the Addendum containing responses to comments received in the Draft. The Addendum was distributed on November 10, 1981 to persons and organizations who commented on the DEIR. The Planning staff received a late comment on the Draft EIR and a number of letters commenting on the Final EIR's Addendum response to comments on the DEIR. Although these comments do not raise any new environmental issues, responses have been prepared as a Supplement to the EIR. The EIR, consisting of the Draft EIR, Final EIR Addendum and Supplement was distributed to the City Council members on December 14, 1981.

This report, which transmits the Final EIR and the applications for South Natomas Business Park projects to the Planning Commission, is organized as follows:

- Supplement to the EIR
- Staff Report and Recommendation
 - Natomas Eastside (P-9114)
 - Gateway Centre (P-9145)
- Appendix
 - Letters received on the EIR and Projects

APPROVED
BY THE CITY COUNCIL

JAN 5 1982

OFFICE OF THE
CITY CLERK

APPROVED
BY THE CITY COUNCIL

FEB 9 1982

OFFICE OF THE
CITY CLERK

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Cont. to A-6-5-11-82
H = 2-16-82*

Page 1

*#17
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F: 2-16-82*

*Projects apper
with letter condition
Cont to 2-2-82
+ 3-9-82*

City Council

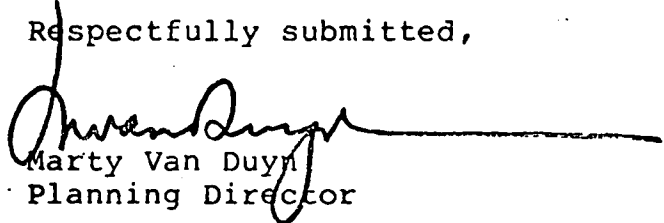
-2-

December 28, 1981

RECOMMENDATION

Staff and the City Planning Commission recommend that the City Council certify the Final EIR adequate, has been prepared in compliance with CEQA, and would have a significant effect on the environment.

Respectfully submitted,



Marty Van Duyn
Planning Director

FOR CITY COUNCIL INFORMATION
WALTER J. SLIPE
CITY MANAGER

MVD:CC:lo
Attachments
P-9114, P-9145

January 5, 1982
District No. 1

SUPPLEMENT TO THE EIR

RESPONSE TO COMMENTS ON THE FINAL EIR ADDENDUM-CORRECTED DECEMBER 28, 1981

Following are responses to significant comments made by the applicants, public agencies, interest groups, and members of the public. Wherever possible, written comments have been paraphrased.

1. Comment. (Cofer, County of Sacramento Air Pollution Control District, late comment on draft EIR) High Technology industry and/or research and development firms have a potential to emit toxic air contaminants; the potential impacts of such emissions are not addressed in the EIR.

Response. See response to comment #10, p. 32, of the Final EIR Addendum.

2. Comment. (Cofer, SCAPCD.) DEIR emissions projections do not include emissions of toxic air contaminants, projections of motor vehicle emissions generated from commercial traffic servicing the project, increased traffic from individuals doing business in project area, and tenants who may operate motor vehicle fleets from the project site.

Response. See response to comment #10, p. 32 regarding toxic emissions. With respect to the range of vehicular activities associated with business parks such as the ones proposed, the trip generation rates used in projecting traffic increases and associated air pollutant emissions are based largely on sample counts taken at similar business parks throughout California by the Transportation Planning Branch of CalTrans and others. Traffic generation rates based on adjusted averages of these sample counts inherently include commercial service traffic, related business traffic, and vehicular fleet traffic.

3. Comment. (Cofer, SCAPCD.) Mitigation measures need to be expanded and added to fully mitigate potential air quality impacts.

Response. See response to comments #6 and #9, pages 30 and 31 of the Final EIR Addendum.

4. Comment. (Cofer, SCAPCD.) Responsible agencies should be fully identified and an implementation plan for mitigation should be proposed.

Response. See response to comment #2, p. 37 and comments #6 and #9, pages 30 and 31 of the Final EIR Addendum.

5. Comment. (Greg Rodgers for Lee Sammis Company) Final EIR response to comment #7 under N. Energy appears to still be in error. Correcting that error results in a total annual energy consumption of 5,704,105 therms vs. 6,635,650, a 38 percent increase in energy consumption over the SNCP rather than the 60 percent increase stated in the DEIR.

Response. Error acknowledged. DEIR Table 53 (p. N-6) indicates 750,000 s.f. of commercial development, whereas only 75,000 s.f. has been proposed. Error results in the overestimated energy use figures. The correct annual energy consumption figure is 5,704,105 therms -- a 38 percent increase in energy consumption, rather than the 60 percent increase stated in the DEIR.

6. Comment. (State of California Air Resources Board) The projects' impacts on the 8-hour carbon monoxide standard of 9 ppm. should be addressed.

Response. The 8-hour carbon monoxide concentration as a result of the projects has been calculated in response to this comment, using the ARB and EPA recommended method of multiplying the calculated one-hour concentration from the FEIR by a factor of 0.7. Using this "worst case" technique, no receptor locations within the project areas would experience 8-hour levels in violation of the 8-hour standard (9 ppm).

However, three intersections within the South Natomas planning area do show violations of the 8-hour standard with planning area buildout with and without the projects. These are: El Camino at Truxel, El Camino at Northgate, and Garden Highway at Northgate.

7. Comment. (ARB) Mitigation measures should be included to "offset" air quality impacts due to the project.

Response. A number of mitigation measures have been suggested in the Traffic and Circulation, Air Resources, and Energy sections of the EIR which would reduce air emissions increases anticipated with the projects. With regard to measures which might specifically "offset" project air quality impacts, the ARB staff may be alluding to a regulatory approach whereby new, stationary sources which may result in non-attainment of regional air quality goals can be allowed if emissions from existing sources in the air basin are reduced to more than compensate for the new source effects.

Opportunities for concurrent reductions in air emissions may occur at projects operated by the applicants elsewhere in the air basin, such as establishment of effective "transportation system management" actions at other employment intensive projects in the air basin (flex-time, van-pooling, etc.). Such an offset approach might result in an overall highway emissions inventory which would fall within Sacramento Valley airshed attainment goals. The applicants would be responsible for identifying, proposing and quantifying the effects of such "offset" measures.

If the proposed combination of onsite and offsite air emissions "offset" opportunities will not effectively reduce air emissions to meet Sacramento AQMA Air Quality Plan attainment goals for 1987, then approval of the project would require a "statement of overriding considerations" from the City.

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Item 2

(2)

8. Comment. (ARB) FEIR should identify agencies responsible for funding and implementing roadway improvements, as well as other mitigation measures proposed to offset projects air quality impacts.

Response. See response to Comment #7 above. Mitigation measures suggested in the EIR are intended for consideration an action by the Planning Commission and City Council in their review of the proposed action. These two development review bodies can require that any or all of the recommended onsite measures be incorporated into the project design. Responsibility for implementing and financing offsite measures would also be determined by Planning Commission and City Council action.

Where necessary, the EIR suggests specific financial responsibilities and mechanisms for implementing offsite mitigation measures (see p. D-23, line 6; p. D-23, section b; p. F-17, section 3; p. J--4, section 3.a(1) and c(1); and p. N--5, section 3, paragraph 3).

9. Comment. (ARB) Discussion on p. 31 of project consistency with the Regional Air Quality Plan is unclear.

Response. Comment acknowledged. Second paragraph of response should read: "Therefore, in this sense the South Natomas Business Parks would not be consistent with the Air Quality Plan."

10. Comment. (William Holliman for 885 Investment Company) The draft EIR is inaccurate because the traffic assessment did not recognize a second entry and exit point for Natomas Eastside.

Response. The draft EIR's traffic assessment did recognize the second entry and exit point for Natomas Eastside. This access point was not found to be a critical intersection and therefore not included. While this access point does provide for an additional route into Natomas Eastside, any traffic that would use this access point from I-5 would still have to pass through the West El Camino/Natomas Oaks Drive intersection.

11. Comment. (Holliman) The draft EIR is inaccurate because it overestimates the amount of traffic traveling to the site from the north loading up I-5/Garden Highway and it did not consider access from I-880 to West El Camino.

Response. The directional distribution as described in the draft EIR, E-16, assumed that westward, northward and some eastward traffic would use West El Camino to I-880. Specifically see the assumptions noted on Table 30, page F-16 of the draft EIR. A comparison of the directional distribution used in the South Matomas Community Plan EIR and Business Park EIR clearly indicates additional loadings of traffic to the north.

| <u>Direction/EIR</u> | <u>Community Plan</u> | <u>Business Park</u> |
|----------------------|-----------------------|----------------------|
| North | 5% | 25% |
| East | 30% | 15% |
| South | 50% | 45% |
| West | 5% | 5% |
| Internal | 10% | 10% |
| | 100% | 100% |

12. Comment. (Holliman) JHK determined the projections made in the draft EIR of the number of trips oriented towards downtown Sacramento and South Sacramento were greatly overstated. By using directional distribution for home based, commercial, and office trips, rather than a single distribution which was used in the draft EIR, JHK found the actual number of trips to be twenty to twenty-five percent less than that projected in the draft EIR.

Response. The 20 to 25% less traffic projected by JHK compared to the draft EIR is not the result of different distribution methods. The difference results from the use of identifying specific project land uses for Gateway Centre low traffic generation factors and directional distribution. First, JHK specifically identified potential land uses in Gateway Centre such as Health club - 20,000 sq. ft. @ 37.5 TE/1,000 sq. ft., Restaurant - 30,000 sq. ft. @ 76 TE/1,000 sq. ft., Banks - 13,000 sq. ft. @ 179 TE/1,000 sq. ft., Data processing - 435,000 sq. ft. @ 7.5 TE/1,000 sq. ft., Regional offices - 435,000 sq. ft. @ 11.5 TE/1,000 sq. ft.; and General offices - 580,000 sq. ft. @ 15 TE/1,000 sq. ft. (JHK, August 1981 page 3-6).

In doing this, JHK was able to use more refined traffic generation factors instead of the usual office park factor of 20.65 average weekday vehicle trip ends per 1,000 square feet (range: 9.4 TE to 30.3 TE - source ITE, 1975). The average weekday vehicle trip end for a general office building per 1,000 square feet is 11.69 with a range of 3.8 TE to 43.5 TE (source ITE, 1975). Caltrans and the City use 15 TE. JHK used unsubstantiated land use assumptions in projecting the development scenario for Gateway Centre.

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Item 2

Secondly, JHK used traffic generation factors below the median (between the minimum and maximum rate) which, in the opinion of City staff, is not a valid projection technique and does not provide a worst case analysis.

Thirdly, the distribution of traffic is based on known driving patterns from SACOG's transportation models and the City Traffic Engineer's judgement of probable travel patterns. CH2MHill reviewed these projections and made alterations to develop a reasonable distribution of traffic from the two proposed projects. The directional distribution used in the draft EIR was provided in Table 30 page F-16. Staff and the consultants believe the 45% trips assigned to the south are not overstated since the proposed business parks are supposed to supplement the CBD's office and commercial activities. In fact, the staff and consultants believe that JHK's 44% traffic distribution by way of West El Camino/I-880 route is greatly overstated, unsubstantiated and unrealistic.

13. Comment. (Holliman) The levels of service assigned to each of the critical intersections have a sizable degree of uncertainty due to the indefiniteness of the base data with which the service levels were determined. The origin of this data or the method by which it was calculated has not been substantiated.

Response. Upon receiving the draft EIR, questions regarding the assumptions used in the traffic assessment were raised. Staff and the applicants requested CH2MHill to provide the base assumptions. CH2MHill delivered to the Planning staff the base assumptions and conditions along with computer print out calculations on October 28, 1981. Staff provided the information to the applicants within two days. City staff has reviewed this data and believes that the CH2MHill assessment is accurate and comprehensive.

The projection of the traffic impacts are substantiated and were developed from currently accepted traffic engineering modeling techniques. No such data was provided by JHK.

14. Comment. (Holliman) The environmental analysis should not focus on the specific numbers, but rather should use the numbers as a general gauge of the service level range within which the project may fall.

Response. Level of service calculations do provide a traffic capacity range. This system provides the best projection technique available and is traditionally accepted. Projecting traffic volumes and comparing to roadway capacity provides an accurate assessment to potential impacts. This method is a theoretical modeling technique. The City Traffic Engineer indicates that projections for a level of service will generally result in one level of service lower (e.g. a planned "C" level of service will result in an actual "D" level of service).

15. Comment. (Holliman) It must be recognized that the data in the EIR and in the subsequent analyses are based on conditions projected to exist at full build-out of the entire South Natomas area, both east and west of I-5. These conditions, of course, will not exist when Natomas Eastside, if approved, is completed, and possibly will never exist. As such, the figures given represent the absolute worst case situation.

Response. Staff and CH2MHill believe that the traffic assessment represents a FAIR and REASONABLE projection. Traffic generation rates used were averages, not low or high factors. For instance, the commercial and office high traffic generation factors are two to three times greater than the average rate (see response to comment 14); Caltrans and the City Traffic Engineering Division residential traffic factors are 10 TE for single family, 8 TE for townhouse, and 6 TE for apartments while the EIR used 8, 7, and 6 respectfully; the EIR used 6% bus transit utilization while RT and City Traffic Engineering believes 2% would have been a more realistic factor. A factor of 0% would be used for a worst case analysis which is the usual assessment method. In addition, the EIR used a 23% factor for workers residing in the community plan area which is undocumented and considered high by staff. Consequently, the EIR definitely does not approach presenting an absolute worst case traffic situation. Furthermore, not to assess the impacts at full community plan build-out would not be a complete or accurate assessment of the projects' impacts on a long term basis. Not providing long term impacts would be in conflict with the State EIR guidelines and would not provide decision makers with an accurate projection of future impacts. See CEQA Section 15140g.

16. Comment. (ALUC) The EIR should identify the location of the project with respect to the airport and estimate the concentration of people expected to be present in the proposed office uses located within Safety Area 3.

Response. The draft EIR indicates the Safety Area 3 on the proposed project in Figure 9, page D-11. The concentration of people issue will be addressed when subsequent specific developments are submitted. These proposals will be forwarded to ALUC for review and comment.

December 17, 1981

Item 2

16

17. Comment. (Mr. Gerald Rioux) The Final EIR addendum did not include all my comments, did not adequately respond to my comments, and request postponement of EIR certification.

Response. City staff summarized all testimony heard on October 1, 1981 public hearing on the Draft EIR in an outline of substantive comments requiring a response by the EIR authors. The City staff and EIR consultants believe the comments on that list have been responded to directly, with the exception of the question of displaced neighborhood commercial uses and associated additional office displacement effects on residential uses.

Projects would not result in a net displacement of neighborhood commercial uses; instead, projects would result in an additional 137,880 square feet of support commercial over current SNCP (+62,800 in Natomas Eastside; +75,000 in Gateway Centre). There would be no offsite housing displacement effects of this additional support of "neighborhood" commercial.

"Neighborhood" commercial refers to commercial uses intended to serve convenience needs of immediate community; with proposed projects, "community" changes to more office; hence, commercial uses will tend to include more office support businesses.

With regard to inadequate response to comment re: "Cleary vs County of Stanislaus" decision, the EIR authors believe that responses to comments on DEIR are reasonably specific and represent a good faith, reasoned analysis of each substantive issue raised. CEQA Guidelines (Section 15150) state that an evaluation of environmental effects "need not be exhaustive." "The sufficiency of an EIR is to be reviewed in light of what is reasonably feasible." "The courts have not looked for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."

18. Comment. (Mr. Rioux) The EIR failed to analyze second and third order of impacts.

Response. The EIR does include extensive analysis of secondary impacts, including housing displacement and secondary employment effect, plus associated housing demand, traffic, and air quality impacts.

Secondary housing impacts are addressed in the following DEIR sections: E.2.e. (Residential Distribution of Direct Employment), E.2.f. (Residential Distribution of Added Indirect Jobs); E.2.g. (Housing Demands Generated by Project Residential Displacement); and E.2.h. (Accommodation of Housing Demands in South Natomas Specifically).

Secondary job multiplier effects were also assessed in the traffic impact assessment. The traffic assessment is based on a zonal analysis of existing and designated land uses and associated trip generation factors. Trip generation factors for all offsite zones have carefully taken into account secondary job effects (designated and actual land uses in offsite zones are the primary determinants of secondary job effects on traffic).

Regarding the August 25, 1981 Caltrans observations on AM traffic at I-5/Garden Highway, these comments have been incorporated into the EIR (see FEIR, p. 17-18, response to Comment No. 4: "The freeway impacts outlined by Caltrans are acknowledged and have been added to the amended traffic analysis in the ERRATA section of this report.").

"Assessment" of "Third order" impacts, i.e. secondary impacts of secondary impacts, were not included within the scope of this analysis in light of the low likelihood of significant effects of this order.

19. Comment. (Mr. Rioux) The EIR does not assess the effects of another similar project proposed on the east side of I-5.

Response. Cumulative effects of this additional project will be addressed in the Creekside EIR now underway.

20. Comment. (Mr. Rioux) The City's General Plan Growth Concept study should be complete before certifying the EIR on these projects.

Response. Certification of the SNBP EIR should be based on a finding by the City with respect to adequacy. The GCS program should have no bearing on the City's decision with respect to the adequacy of the SNBP EIR.

21. Comment. (Sacramento City Police Department, Officer Jim Barclay) The projects will result in lower service demands than would buildout under the current SNCP, there will nevertheless be a significant increase over present policy protection demands.

Response. Comment acknowledged. Although EIR emphasizes differences in impact between projects and current SNCP, City decision makers should note that both scenarios will result in significant increases in policy protection demands.

22. Comment. (Yuba County Agricultural Air Pollution Control District)

Why has a development of this type even been proposed which would permanently remove utilization of any amount of this excellent agricultural soil?

Response. The City has planned that the South Natomas area would be residentially developed since the turn of the Century. Although the soil is good for agriculture, one of the goals of the 1978 South Natomas Community Plan was to increase the residential densities to reduce the development pressures on North Natomas. The office development is proposed by the land owners but is not consistent with the City's General and Community Plans.

23. Comment. (Yuba County Agricultural Air Pollution Control District)

If land use planning is truly what it is supposed to be, then the land would be utilized to its best capacity. Are there not other sites for business developments, such as the foothills, which would not waste prime agricultural lands?

Response. There are a number of suburban office parks yet to be developed in various locations in the City which are consistent with the City's General and Community Plans, have freeway access and office zoning. However, the landowners believe there is a demand for the proposed projects and that the location is better than other office parks. There are three existing office parks that could accommodate at least two million square feet.

December 2, 1981

CITY PLANNING COMMISSION

DEC 8 - 1981

RECEIVED

MEMO TO: CLIF CARSTENS, SENIOR PLANNER

FROM: JIM BLOODGOOD, ASSISTANT CIVIL ENGINEER

SUBJECT: SOUTH NATOMAS BUSINESS PARK TRAFFIC ANALYSIS

Upon review of the two separate traffic analysis for the South Natomas Business Park proposal, it is apparent that both the E.I.R. consultant (CH₂M HILL) and the developer of the Gateway Center proposal's consultant (JHK & Associates) are in agreement with each other in many respects concerning the base case assumptions for preliminary analysis of the South Natomas Region. This is shown in the approximately 1% difference in total ADT anticipated to be generated at buildout of the South Natomas Community Plan. Also, intersection level of service analysis at locations common to each report are roughly the same with the exception of the A.M. peak at the I-5 northbound offramp and W. El Camino and I-5 southbound offramp and Garden Highway. The E.I.R. has determined levels "A" and "D", respectively, while the JHK report indicates levels "C" and "B", respectively. Basically though, both reports indicate that the subject intersections will be operating at acceptable levels at buildout of the South Natomas Community Plan, anticipating, of course, roadway improvements outlined in the Community Plan.

PEAK HOUR LEVELS OF SERVICE
(Without Projects)

| <u>Intersection</u> | <u>E.I.R.</u> | | <u>JHK</u> | |
|---------------------------------------|---------------|-------------|-------------|-------------|
| | <u>A.M.</u> | <u>P.M.</u> | <u>A.M.</u> | <u>P.M.</u> |
| Natomas Oaks Dr./W. El Camino | B | C | B | B |
| I-5 Northbound Offramp/W. El Camino | A | B | C* | C |
| Natomas Oaks Dr./Garden Highway | A | A | A | A |
| Orchard/W. El Camino | A | A | A | B |
| I-5 Northbound Offramp/Garden Highway | A | B | A | C |
| I-5 Southbound Offramp/Garden Highway | B | D | B | B* |

*Indicates more than one level of service difference.

Both reports alter the base case roadway improvements from the Community Plan slightly at Orchard Lane and W. El Camino by suggesting a dual left turn for the east approach. Also, both reports indicate changes from Community Plan geometrics at Natomas Oaks Drive and W. El Camino by also indicating a dual left-turn lane configuration for the east approach. These changes are minor and considering both intersections' anticipated operation, would not actually be necessary.

When moving comparisons to the substitution of residential housing with the Gateway Center and Natomas Eastside Proposals, the differences become more apparent. The E.I.R. states that this displacement will generate 42,125 additional trips per day from the project site, while the JHK report anticipates only 24,200 additional trips. Also, the JHK report and E.I.R. differ their

respective zonal analysis of the South Natomas Area and directional distribution of the generated traffic. The E.I.R. expects most of the traffic to gain access to the area via I-5 and the freeway ramps at W. El Camino and Garden Highway with a small amount of traffic to use I-880 and W. El Camino. The JHK report expects higher use of I-880 by the commuter.

The lower trip generation and higher usage of I-880 result with the JHK report anticipating substantially different levels of service at the identified intersections than the E.I.R.

The two reports find the following levels of service:

| Intersection | PEAK HOUR LEVELS OF SERVICE (With Projects) | | | |
|---------------------------------------|--|------|------|------|
| | E.I.R. | | JHK | |
| | A.M. | P.M. | A.M. | P.M. |
| Natomas Oaks Dr./W. El Camino | F | F | D* | F |
| I-5 Northbound Offramp/W. El Camino | F | B | F | C |
| Natomas Oaks Dr./Garden Highway | A | F | A | C* |
| Orchard/W. El Camino | B | C | E* | F* |
| I-5 Northbound Offramp/Garden Highway | B | C | A | E* |
| I-5 Southbound Offramp/Garden Highway | F | F | C* | C* |

*Indicates more than one level of service difference.

The most visible differences in the two reports occur at Natomas Oaks Drive/Garden Highway, Orchard/W. El Camino and I-5 Southbound Offramp/Garden Highway.

The Natomas Oaks Dr./Garden Highway location could probably operate at a higher level of service than indicated in the E.I.R. with the implementation of an overlap phase in the signal operation.

The difference indicated at Orchard and W. El Camino is a result of the JHK report, assuming a higher usage of I-880. And, conversely, the difference at I-5 Southbound Offramp is attributable to the E.I.R. anticipating higher usage of I-5.

Preliminary work for the South Natomas Community Plan prepared by this office supports the findings of the E.I.R. with regard to a higher usage of I-5 rather than I-880 and would therefore indicate that concern should be given to the I-5 Southbound Offramp/Garden Highway.

Additionally, since the JHK report does indicate a higher usage of I-880, an analysis of W. El Camino/I-880 off and on ramps should be prepared and should take into account future development on the north and west quadrants of this interchange.

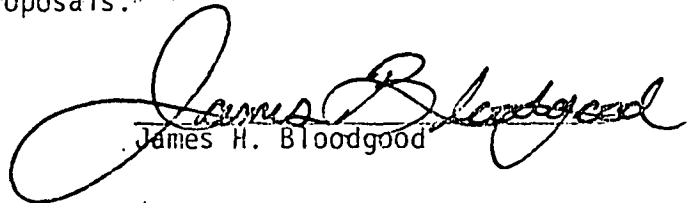
December 2, 1981

Mitigation measures in the two reports are indicating similar physical improvements to improve intersection operations. It can be agreed that through lanes and turning lanes can be added at intersections, where physically possible, until the desired level of service is obtained. This will result in intersections at many locations similar in appearance to Fair Oaks and Howe yet serving traffic needs for an area far more restricted than the area served by either Fair Oaks or Howe. However, it is apparent from both reports that no amount of physical improvements are possible at I-5 Northbound Offramp/W. El Camino to improve the A.M. peak due to physical constraints.

The most significant difference in mitigation measure requirements occurs at the I-5 Southbound Offramp/Garden Highway Interchange. The JHK report feels that the interchange as presently designed can adequately handle the anticipated traffic. The E.I.R., however, feels that significant physical improvements will be required to insure an adequate level of service.

Based on the preliminary work mentioned earlier and the communications between Traffic Engineering and the E.I.R. consultant, this division fully supports the findings of the E.I.R. and finds the document to be a fair and adequate representation of future traffic impacts of the proposed projects.

In light of the E.I.R.'s findings and considering the findings relating to traffic in the Creekside Draft E.I.R., this division recommends denial of the Natomas Eastside/Gateway Center proposals.


James H. Bloodgood

JHB/mf

December 17, 1981

DEC 17 1981

RECEIVED

MEMO TO: Clif Carstens, Planning

FROM: Jim Bloodgood, Assistant Civil Engineer

SUBJECT: South Natomas Business Park

As you may recall at the December 8, 1981 meeting, we had with the Lee Samis, JHK, and CH₂M Hill representatives, it was requested by the Samis people that CH₂M Hill review their traffic analysis at Garden Highway/Natomas Oaks Drive, and Garden Highway/I-5 Southbound off-ramp.

On December 14, 1981, in a phone conversation with Wayne Kittleson of CH₂M Hill's Portland office the following information was received:

Natomas Oaks Drive/Garden Highway

The analysis which appears in the E.I.R. for this intersection is in error. A program malfunction did not allow for the optional operation of the western most lane for southbound Natomas Oaks Drive. This is to say essentially, a single left turn lane was considered for southbound traffic. The following is the revised capacity analysis for the various proposals:

Natomas Oaks Drive/Garden Highway

| | A.M. | P.M. |
|------------------|---------|---------|
| Community Plan | 38% (A) | 44% (A) |
| Projects | 42% (A) | 72% (C) |
| Natomas Eastside | 41% (A) | 47% (A) |
| Gateway Center | 38% (A) | 64% (B) |

This information indicates that this intersection will operate at acceptable levels given any scenario. This had been anticipated for this intersection in my December 2, 1981, memo to you.

Garden Highway/I-5 Southbound Off-Ramp

This location was re-evaluated with two left turn lanes for westbound traffic to mitigate traffic impacts as proposed by JHK at our meeting.

Garden Highway/I-5 Southbound Off-Ramp

| | A.M. | P.M. |
|------------------|----------|---------|
| Community Plan | N/A | N/A |
| Projects | 107% (F) | 94% (E) |
| Natomas Eastside | 81% (D) | 77% (C) |
| Gateway Center | 81% (D) | 85% (D) |

It does not appear that this additional improvement will provide adequate mitigation for the combined projects. Levels of service are improved for each project separately, but still below the required "C" level of service.

CH₂M Hill also did analysis at Natomas Oaks Drive and West El Camino Avenue, using the mitigation measures proposed by JHK. That is, three through lanes for each direction on West El Camino, one through lane for north & southbound Natomas Oaks Drive, free right turns on all approaches, and dual left turn lanes on all but the west approach, which would be a single left turn lane. With these changes the following levels of service can be anticipated:

Natomas Oaks Drive & West El Camino

| | A.M. | P.M. |
|------------------|----------|----------|
| Both Projects | 108% (F) | 114% (F) |
| Natomas Eastside | 91% (E) | 113% (F) |
| Gateway Center | 76% (C) | 71% (C) |

These improvements would mitigate the traffic impacts at this location, if Gateway Center were to be developed, but would be unacceptable if Natomas Eastside, or the two projects combined were approved.

In addition to this information, I had requested CH₂M Hill to review the intersections of West El Camino and Azevedo, and West El Camino and Truxel. The following represents that analysis:

| <u>Location</u> | <u>S.N.C.P.</u> | | <u>S.N.B.P.</u> | |
|------------------------|-----------------|----------|-----------------|----------|
| | A.M. | P.M. | A.M. | P.M. |
| W. El Camino & Azevedo | 115% (F) | 126% (F) | 155% (F) | 145% (F) |
| W. El Camino & Truxel | 99% (E) | 181% (F) | 133% (F) | 224% (F) |

It must be noted that these locations were not subjected to as detailed an analysis as were the locations on the west side of I-5. However, Creekside dEIR identify both locations as congested areas, anticipating level of service "E", for both locations under the South Natomas Community Plan. Both consultants are doing a much more detailed review of the traffic impacts than was prepared for the Community Plan and so, these locations are just now coming to light as conflict areas. Once again, improvements of the Fair Oaks & Howe Avenue type, may be required to mitigate the situations at these intersections.

If the projects were to develop, it would mean very large intersections and major congestion on West El Camino at Truxel, Azevedo, I-5 Northbound off-ramp, Natomas Oaks Drive, and, (If you consider the JHK reports findings) Orchard Lane.

J8/c1



CITY OF SACRAMENTO

12

CITY PLANNING DEPARTMENT
927 TENTH STREET
SUITE 300
SACRAMENTO, CA 95814
TELEPHONE (916) 449-5604

MARTY VAN DUYN
PLANNING DIRECTOR

December 28, 1981

City Council
Sacramento, California

Honorable Members in Session:

- SUBJECT:
1. Environmental Impact Report.
 2. Amend 1974 General Plan from residential to commercial and office (130+ ac.) and to delete a school site.
 3. Amend 1978 South Natomas Community Plan from Residential-22 av. to commercial-shopping center (21+ ac.) and business and professional offices (6+ ac.); from Commercial-shopping center to business and professional offices (16+ ac.); from Residential-7 av. to residential-22 av. (21+ ac.) and business and professional offices (70+ ac.); relocate 0.5+ ac. fire station from north side of West El Camino Avenue to 1.5+ ac. site on south side of West El Camino Avenue; delete the 10+ ac. school site; add an additional intersection onto West El Camino Avenue.
 4. Establish Natomas Eastside PUD as a business and residential park.
 5. Appeal of Planning Commission's denial to Initiate Rezone for requests not consistent with the 1978 South Natomas Community Plan. (P-9114)

LOCATION: West of I-5, north of West El Camino Avenue, east of Main Drainage Canal and south of I-880. (Natomas Eastside)

SUMMARY

In 1978, the City Council adopted the South Natomas Community Plan. The plan promoted higher residential densities to provide close-in housing to the Central Business District. The proposed project, Natomas Eastside, would introduce a major regional office park and displace planned residential land uses. The Community Plan included neighborhood oriented commercial and office land uses that are designated on subject property. The Planning Commission recommended denial of the entitlements not consistent with the South Natomas Community Plan.

The staff report to the Planning Commission, voting records, and appeal are attached for the Council's information.

VOTE OF PLANNING COMMISSION

On December 17, 1981, the Planning Commission recommended denial of the General and Community Plan Amendments, Establishment of Natomas Eastside PUD as a business park, and Denied the Initiate to Rezone for requests not consistent with the Community Plan by a vote of six ayes, one no and two abstentions.

RECOMMENDATION

The staff and Planning Commission recommend the following:

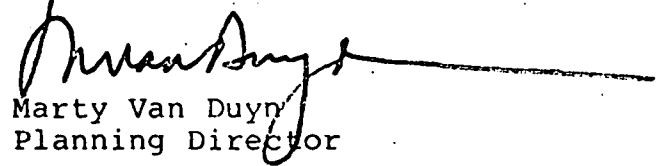
1. Determine that the Final EIR is adequate.
2. Certify that the EIR has been prepared in compliance with CEQA and that the City Council has considered the information contained in the Final EIR.
3. Determine that the project will have a significant effect on the environment based on the findings included in the staff report to the Planning Commission.
4. Deny the amendment to the 1974 General Plan from residential to commercial and offices and to delete a school site.
5. Deny the amendments to the 1978 South Natomas Community Plan from residential-22 av. to commercial-shopping center and to business and professional offices; from residential-7 av. to residential-22 av. and business and professional offices, relocation of a fire station, deletion of a school site, and to add an additional intersection onto West El Camino Avenue.
6. Deny the PUD as proposed by the applicant because the proposed land uses are inconsistent with the 1978 South Natomas Community Plan. Recommend approval of a PUD designation in concept for the residential, commercial-shopping center and business and professional land uses as designated on the 1978 South Natomas Community Plan based on the following findings of fact:
 - a. The PUD as recommended will be consistent with the goals and objectives of the Zoning Ordinance (Section 8) as it will encourage the design of residential, convenience shopping facilities and offices in a well-designed and coordinated site development;

December 28, 1981

- b. the PUD as recommended is consistent with the land uses designated on the 1978 South Natomas Community Plan; and
- c. the PUD as recommended will not be injurious to public welfare nor to other property in the vicinity of the development as appropriate height and area requirements and parking standards will be supplied to the development.

7. Deny the Appeal of Planning Commission's denial to Initiate Rezone for requests not consistent with the Community Plan. However, approve the request to initiate a rezoning from Agriculture (A) to Office Building OB-PUD (19+ acres) and to Shopping Center SC-PUD (26+ acres) at the locations designated on the South Natomas Community Plan.

Respectfully submitted,


Marty Van Duyn
Planning Director

FOR CITY COUNCIL INFORMATION
WALTER J. SLIPE
CITY MANAGER

MVD:CC:lo
Attachments
P-9114

January 5, 1982
District No. 1

MEETING DATE 12/17/81
ITEM NO. 2 FILE NO. P-9114
SP-9145

GENERAL PLAN AMENDMENT ☐
COMMUNITY PLAN AMENDMENT ☐
REZONING ☐
SPECIAL PERMIT ☐
VARIANCE ☐

TENTATIVE MAP ☐
SUBDIVISION MODIFICATION ☐
ENVIRONMENTAL DET. ☒
OTHER FINAL EIR
SR. NATOMAS BUSINESS
PARK PROPOSALS

LOCATION: WEST OF INTERSTATE 5 NORTH OF EARLEN
HIGHWAY & SACO RIVER

☒ Favorable ☐ Unfavorable ☐ Petition ☐ Correspondence

PROPOSANTS
APPLICANTS

NAME

ADDRESS

WILLIAM HOLLIMAN (ATT'Y FOR APPLICANT P.9114) 555 CAPITOL MALL, SACRAMENTO

JACK DIEFFENBROCK (ATT'Y FOR DEFENDANT P. 9/45) 455 CAPITOL MALL STE ECD "

~~APPROPRIATE~~
~~EXPOSURES~~
OPPORTUNITIES

NAME

ADDRESS

MOTION NO. 7

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|---------|----|--------|-----|
| Augusta | ✓ | | | |
| Fong | ABSTAIN | | | |
| Goodin | | ✓ | | |
| Holmoway | ABSTAIN | | | |
| Hunter | ✓ | | ✓ | |
| Larson | ✓ | | | |
| Muraki | ✓ | | | |
| Silva | ✓ | | | ✓ |
| Simpson | ✓ | | | |

- ☐ TO APPROVE
- ☐ TO DENY
- ☐ TO APPROVE SUBJECT TO COND. & BASED ON FINDINGS OF FACT IN STAFF REPORT
- ☐ INTENT TO APPROVE SUBJ. TO COND. & BASED ON FINDINGS OF FACT DUE _____
- ☐ TO RECOMMEND APPROVAL _____ & FORWARD TO CITY COUNCIL
- ☐ TO RATIFY NEGATIVE DECLARATION
- ☐ TO CONTINUE TO _____ MEETING
- ☒ OTHER per staff recommendation

SACRAMENTO CITY PLANNING COMMISSION

MEETING DATE 12/17/81
 ITEM NO. 2 FILE NO. P- 9114
 M-

GENERAL PLAN AMENDMENT ☒ TENTATIVE MAP ☐
 COMMUNITY PLAN AMENDMENT ☒ SUBDIVISION MODIFICATION ☐
 REZONING (INITIATE) ☒ ENVIRONMENTAL DET. ☐
 SPECIAL PERMIT ☐ OTHER ESTABLISH NATIONAL
 VARIANCE ☐ EASTSIDE PLD

Recommendation:
☐ Favorable
☒ Unfavorable

LOCATION: NE Quadrant of I-5 North + South of West
FLCAVINO east of Main Browning Canal + W of I-5
☐ Petition ☒ Correspondence "NATOMAS EASTSIDE"

PROPOSERS

NAME

ADDRESS

WILLIAM HOLLIMAN (ATTY FOR APPLICANT) 555 CAPITOL MALL SACRAMENTO

OPPOSERS

NAME

ADDRESS

see list from P-9145 (comments taken in common
with both projects P-9114 and P-9145)

MOTION NO. 2

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|---------|----|--------|-----|
| Augusta | ✓ | | | |
| Fong | ABSTAIN | | | |
| Goodin | | ✓ | | |
| Holloway | ABSTAIN | | | |
| Hunter | ✓ | | ✓ | |
| Larson | ✓ | | | |
| Kuraki | ✓ | | | |
| Silva | ✓ | | | ✓ |
| Simpson | ✓ | | | |

- ☐ TO APPROVE
- ☐ TO DENY
- ☐ TO APPROVE SUBJECT TO COND. & BASED ON FINDINGS OF FACT IN STAFF REPORT
- ☐ INTENT TO APPROVE SUBJ. TO COND. & BASED ON FINDINGS OF FACT DUE _____
- ☐ TO RECOMMEND APPROVAL _____ & FORWARD TO CITY COUNCIL
- ☐ TO SATISFY NEGATIVE DECLARATION
- ☐ TO CONTINUE TO _____ MEETING
- ☒ OTHER per staff recommendation w/
approval for parts of correspondence 5

MEETING DATE 12/17/81
 ITEM NO. 2 FILE NO. P- 9145
 M-

GENERAL PLAN AMENDMENT ☒ TENTATIVE MAP ☐
 COMMUNITY PLAN AMENDMENT ☒ SUBDIVISION MODIFICATION ☐
 REZONING (INITIATE) ☒ ENVIRONMENTAL DET. ☐
 SPECIAL PERMIT ☐ OTHER Amend RUD NATALINS
 VARIANCE ☐ OAKS FROM RESIDENTIAL TO
 BUSINESS PARK AND COMMERCIAL

Recommendation:

☐ Favorable
☒ Unfavorable ☐ Petition ☒ Correspondence

LOCATION: NW Quadrant of I-5 North of Garden Highway and
550' South of West El Camino
"GATEWAY CENTER"

PROPOSONENTS

NAME

ADDRESS

JOHN DIEPENBROEK (ATTY FOR APPLICANT) 455 CAPITOL MALL STE 800 SACRAMENTO
 LEE SAMMIS LEESAMMIS CO. 1451 RIVER PARK DR. SACRAMENTO, CA
 BOB FOUNTAIN CSUS ELON CONSULTANTS PROF CSUS SACRAMENTO
 KAREN AHERN 455 CAPITOL MALL STE 800 SACRAMENTO
 CHARLES ABRAMS JHK CONSULTANTS (TRAFFIC)
 MERV SMITKOVICH Sunset Const, INC. 2121 TOLINE CNTR ANAHEIM, CA 928
 SKIP ~~WARR~~ YONS COLDWELL BANKER CO. SACRAMENTO, CA
 TOM AGUER BROWN STEVENS CONSULTANTS SACRAMENTO, CA

NAME

ADDRESS

ROBERT ROYLE SO. NATALINS COMMUNITY ASSOC.
 ROGER DICKINSON ECOS 909 12TH ST. SACRAMENTO, CA
 HEATHER FAREO RESIDENT SO. NATALINS
 JANET HUDDLE SAVE THE AMER. RIVER ASSOC. (SARA)
 JERRY RIO THIMBERWOOD COURT SACRAMENTO
 RAY TRETHEWAY 520 GARDEN HIGHWAY SACRAMENTO, CA
 DON HOREL 1280 TRAIL END WAY SACRAMENTO, CA

MOTION NO. 3

"NEUTRAL" JAMES ELWOOD CITY TRAFFIC ENG.

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|---------|----|--------|-----|
| Augusta | ✓ | | | |
| Fong | ABSTAIN | | | |
| Goodin | | ✓ | | |
| Holloway | ABSTAIN | | | |
| Hunter | ✓ | | ✓ | |
| Larson | ✓ | | | |
| Muraki | ✓ | | | ✓ |
| Silva | ✓ | | | |
| Simpson | ✓ | | | |

- ☐ TO APPROVE
☐ TO DENY
☐ TO APPROVE SUBJECT TO COND. & BASED ON FINDINGS OF FACT IN STAFF REPORT
☐ INTENT TO APPROVE SUBJ. TO COND. & BASED ON FINDINGS OF FACT DUE
☐ TO RECOMMEND APPROVAL & FORWARD TO CITY COUNCIL
☐ TO RATIFY NEGATIVE DECLARATION
☐ TO CONTINUE TO MEETING
☒ OTHER per staff recommendation

NOTICE OF APPEAL OF THE DECISION OF THE
SACRAMENTO CITY PLANNING COMMISSION CITY PLANNING COMMISSION

DATE: December 22, 1981

DEC 4 1981

TO THE PLANNING DIRECTOR:

RECEIVED

I do hereby make application to appeal the decision of the City
Planning Commission of December 17, 1981 when:
(Date)

X Request to Initiate
X Rezoning Application Variance Application
 Special Permit Application

was: Granted X Denied by the Commission

GROUND FOR APPEAL: The applicant believes that the Planning
Commission failed to recognize and act upon the true merits of this
project as well as the benefits it will confer upon the community.

PROPERTY LOCATION: NW Quadrant of I-5 and West El Camino

PROPERTY DESCRIPTION: Property bounded by I-880, I-5, Natomas Main
Drainage Canal and P.G. & E. power lines.

ASSESSOR'S PARCEL NO. 225 - 230 - 15
225 - 230 - 24

PROPERTY OWNER: 885 Investment Company

ADDRESS: 425 University Avenue, Suite 208, Sacramento, CA 95825

APPLICANT: William G. Holliman, Jr., McDonough, Holland & Allen.

ADDRESS: 555 Capitol Mall, Suite 950, Sacramento, CA 95814

APPELLANT: William G. Holliman, Jr. vs.
(SIGNATURE)

ADDRESS: 555 Capitol Mall, Suite 950, Sacramento, CA 95814

FILING FEE: \$60.00 RECEIPT NO. 683

FORWARDED TO CITY CLERK ON DATE OF:

P- 9114

7/80

(4 COPIES REQUIRED)

CITY PLANNING COMMISSION

927-10th Street - SACRAMENTO, CALIFORNIA 95814

| | | | |
|--|--|------------------|-----------------------------|
| APPLICANT | Wm. Holliman, c/o McDonough, Holland & Allen, 555 Capitol Mall #950, Sacto, CA | | |
| OWNER | 885 Investment Co., | P.O. Box 255543, | Sacramento, CA 958 65 95814 |
| PLANS BY | E.M. Kado Assocs., 1819 16th Street, Sacramento, CA 95814 | | |
| FILING DATE | July 11, 1980 | AB884: 2/3/82 | REPORT BY: CC/DP |
| APPLICATION COMPLETE: 9/13/80 EIR Req. 12/22/80 ASSESSOR'S PCL NO. 225-230-15-24 | | | |

- APPLICATION:
1. Certification of the Final EIR
 2. Amend 1974 General Plan from residential to commercial offices (130 + ac.) and to delete a school site;
 3. Amend 1978 South Natomas Community Plan from residential - 22 av. to commercial - shopping center (21 + ac) and business and professional offices (6 + ac) from commercial-shopping center to business and professional offices (16 + ac); from residential - 7 av. to residential-22 av. (21 + ac) and business and professional offices (70 + ac.), relocate 0.5 + ac. fire station from north side of W. El Camino Avenue, to delete 10 + ac. school site, and to add an additional intersection onto W. El Camino Avenue;
 4. Establish Natomas Eastside PUD (180 + ac.) as an office, commercial and residential planned unit development;
 5. Initiate a rezone of 180 + vacant acres from Agriculture (A) to office (OB-PUD) or more restrictive zoning for 106 + ac, general commercial (C-2 PUD) or more restrictive zoning for 30 + ac, and light density multiple family (R-3 PUD) or more restrictive zoning for 21 + ac.

LOCATION: The northwest quadrant of I-5, north and south of West El Camino Avenue, east of the Main Drainage Canal and west of I-5.

PROPOSAL: The applicant is requesting the necessary entitlements to establish a P.U.D. consisting of 106 + acres (1.9 million sq. ft.) of office, 31 + acres of commercial (233,000 sq. ft.), 21 + acres of residential (468 + units), and a 1.5 + acre fire station.

PROJECT INFORMATION:

| | <u>EXISTING</u> | <u>PROPOSED</u> |
|--------------------------|--|--|
| General Plan Designation | Residential and Commercial and Offices | Residential and Commercial and Offices |

APPLC. NO. P-9114MEETING DATE 12/17/81CPC ITEM NO. 2

| | <u>Existing</u> | <u>Proposed</u> |
|--|---|---|
| South Natomas Community Plan Designation | Residential 7 av and 22 av, Business and Professional Offices, Commercial-Shopping Center, School and Fire Station. | Residential 22 av, Business and Professional Offices, Commercial- Shopping Center, and Fire Station |
| PUD Designation | None | Offices, Commercial, Residential, and Fire Station. |
| Zoning | Agriculture (A) | Office (OB-PUD), Commer- cial, (C-2 PUD) and Light Density Multiple Family (R-3 PUD) |

Existing Zoning of Site: Agricultural

Surrounding Land Use and Zoning:

- North: I-880 and Agriculture (A)
- South: Agriculture (R-1A PUD, R-3 PUD)
- East: I-5, Agriculture and Residential (A, R-1 PUD, R-3 PUD)
- West: Main Drainage Canal and Agriculture (F,A)

STAFF EVALUATION:

On October 1, 1981, the Planning Commission reviewed the Draft Environmental Impact Report (DEIR) and forwarded it to the Environmental Coordinator for preparation of the Final EIR (FEIR). The FEIR consists of the Draft EIR and the Addendum containing responses to comments received in the Draft. The Addendum was distributed on November 10, 1981, to persons and organizations who commented on the DEIR. The EIR constitutes the environmental impact report for two projects, Natomas Eastside and Gateway Centre. Six land use alternatives, including the land uses designated by the South Natomas Community Plan and proposed by the applicants, were evaluated in the EIR.

Creekside, a third office park proposal, in South Natomas, is being evaluated in a separate EIR.

In 1978, the City Council adopted the South Natomas Community Plan. The plan promoted higher residential densities for a variety of housing types. The higher densities were designed to provide close-in housing to the Central City Core. The Core represents that area bounded by the Sacramento River and 16th, H and R Streets. The Central Business District and governmental offices are contained within the Core.

Besides designating residential density minimum in South Natomas to accomodate increased numbers of people and to retard the need for urban expansion to the north, the City Council adopted the following goals and objectives:

- Assure that new development is healthy and of long lasting benefit to the community;
- Prohibit the intrusion of incompatible land uses and disruptive traffic into new and existing residential areas;

- Limit commercial and office development to neighborhood and community services and retail sales. Do not permit regional scale developments, especially those which compete with the Central Business District of downtown Sacramento;
- Provide a balanced circulation system that serves local residents and through traffic with a minimum of congestion or conflict with residential neighborhoods, shopping areas and other land uses;
- Encourage development which promotes the conservation of fossil fuels and minimizes air, noise, and water pollution;
- Require the proponent of additional commercial and office development to clearly justify demand to the satisfaction of the planning commission and city council. Such justification shall consider resident concerns, the cited standards pertaining to land and building space, vacancy rates and location criteria;

Land Use

1. The proposed project, Natomas Eastside, would alter the designated residential character of the South Natomas Community by introducing a major regional business park. The South Natomas Community Plan, adopted in February 1978, was designed to provide a close-in residential community, with neighborhood oriented commercial and office land uses, to support the Central City Core. At the time of adoption, the City determined that the higher densities provided in the plan would fulfill the social need for diversified housing in close proximity to the region's major employment center, the Central Core, and would reduce development pressure on prime agricultural land north of Interstate 880. The residential densities and holding capacities adopted for the South Natomas area reflect a balancing of city-wide housing needs. Amendments to the planned residential capacity will effect not only the South Natomas community but other City communities as well. Most recently, the Central City Community Plan residential densities were adopted partially on the basis that South Natomas would play a major role in providing "close-in" housing.

The South Natomas plan appears to be successful. Approximately twenty (20) percent of the residential units called for in the community plan have been built and occupied. The average number of dwelling units built and occupied annually during 1979 and 1980 has been 469 du/yr. In 1980, 1,501 units were tentatively approved for development. Presently, only twenty-five (25) percent of the residentially designated land in South Natomas remains unmapped. The South Natomas Community Plan area is developing as planned. The area provides a variety of housing types within the median price range for Sacramento at a locale in close proximity to the region's major employment center, the Central City.
2. Natomas Eastside would displace approximately 575 residential units. This number represents 2.5% of the theoretical holding capacity (23,046 du) of the South Natomas Community Plan. The displacement is compounded by

the additional demand for housing that will be created as a result of the new jobs, both direct and indirect, generated by the project. Additionally, the project may be growth inducing by encouraging similar business park proposals within the South Natomas Community Plan area. The City currently has two additional proposals submitted--Gateway Centre and Creekside Office Park. Cumulatively, the three business parks would result in a net loss of approximately 2700 residential units designated to support the Central City Core.

The cumulative impact of the reduced number of housing units is compounded by the corresponding demand for housing associated with new employment centers. Natomas Eastside, Gateway Centre and Creekside Office Park are anticipated to create a demand for an additional 6,000-10,500 units. This additional demand represents as much as forty-five percent of the units planned for all of South Natomas.

In addition to the displacement of housing, the project would remove 26 + acres of commercial and 19 + acres of business and professional office uses designated to provide "neighborhood and community services and retail sales" to the residents of South Natomas.

3. Office square footage and developable land designated for office use in suburban locations is existing in residentially developed and residentially developing areas in the City. For instance, developable land at the proposed Park Arden site and remaining developable parcels in Point West can provide 1.4 million square feet along I-80. Southwest Five, a 600,000 square foot business park PUD, was recently approved in the Pocket area.

The removal of land designated for residential uses forces the cost of housing upward because available land supply becomes more limited. The findings of the Questor Affordable Housing Study, supported by the City Council, emphasized that each growth community and the City overall should have ample land available for residential uses in order to keep housing as affordable as possible. These findings are emphasized in the adopted 1980 Housing Element. The conversion of approximately 135 acres of residentially designated land to non-residential uses in the northern portion of the City where further development would be restricted to in-fill because land north of South Natomas is designated urban reserve and permanent agriculture will affect the supply of land and the affordability of housing. There are areas of the City containing considerable amounts of vacant developable land designated for residential use where a job-housing link might be achieved without severely impacting housing affordability.

Traffic and Circulation

While the South Natomas Community Plan was being drafted, a great deal of attention was focused on traffic and circulation. In an effort to encourage transit patronage at residential buildout, the plan was designed to provide transit availability within a one-quarter mile radius of residences. Constraints with regard to freeway interchanges along I-5 were identified during preparation of the Community Plan. The Garden Highway/I-5 interchange provides for travel in all directions, however, four left turn movements are

required. Due to Caltrans standards regarding minimum weaving distances between interchanges, the West El Camino Avenue/I-5 interchange lacks north-bound ramps as a result of its proximity to the I-880/I-5 interchange. As indicated in the table below, with the exception of the I-5 Southbound off-ramp at the Garden Highway, levels of service for the six critical intersections evaluated in the EIR at community plan buildout are within the acceptable range (e.g. A,B,C). However, to the east of I-5, the intersections of Azevedo and Truxel with West El Camino Avenue will be operating at the unacceptable level of service E at PM peak at community plan buildout (Source: Creekside Draft EIR).

PEAK HOUR LEVEL OF SERVICE -
COMMUNITY PLAN, NATOMAS EASTSIDE,
AND GATEWAY CENTER PROJECTS

| Critical Intersections ^b | Levels of Service and Percent of Capacity Used ^a | | | | | | | |
|---|---|---------|------------------|---------|----------------|---------|---------------|---------|
| | South Natomas Community Plan | | Natomas Eastside | | Gateway Center | | Both Projects | |
| | AM Peak | PM Peak | AM Peak | PM Peak | AM Peak | PM Peak | AM Peak | PM Peak |
| Natomas Oaks Drive/ West El Camino | B/62 | C/77 | F/114 | F/141 | D/85 | E/90 | F/119 | F/142 |
| I-5 Northbound Off Ramp/West El Camino | A/43 | B/59 | E/90 | B/62 | C/67 | B/62 | F/115 | C/73 |
| Natomas Oaks Drive/ Garden Highway | A/38 | A/44 | A/41 | A/47 | A/38 | B/64 | A/42 | C/72 |
| Orchard/West El Camino | A/46 | A/52 | B/56 | B/63 | A/48 | B/56 | B/58 | C/67 |
| I-5 NB Off Ramp/ Garden Highway | A/48 | B/56 | B/59 | B/62 | A/54 | C/67 | B/65 | C/73 |
| I-5 SB Off Ramp/ Garden Highway | C/72 | D/80 | E/99 | E/93 | E/99 | F/108 | F/126 | F/122 |

Source: CH2M HILL, October 14, 1981.

^aLevel of service (LOS) shown in letter designation followed by percent of roadway capacity used (e.g., B/62). For definition of LOS, see Table 25 in SNBP Draft EIR.

^bAssumed minimum set of intersection improvements defined in South Natomas Business Park Draft EIR.

As indicated in the table above, the project would result in unacceptable levels of service at three intersections. Cumulatively, Natomas Eastside and Gateway Centre would result in the unacceptable level of service F at three critical intersections. The combined projects would more than double the average daily trip rate from the project sites from 32,500 ADT to 74,600 ADT and would increase South Natomas communitywide traffic volumes by 18.5%. With both projects, PM peak hour outbound traffic from the project sites would increase by 230%, while AM peak hour inbound would increase by 25%. Cal Trans

has cautioned that the amount of traffic generated by the South Natomas Community Plan at residential buildout alone will warrant ramp metering and high occupancy vehicle ramp bypass lane strategies along I-5 (Trombatore, 8/25/81). The proposed project would therefore compound congestion and require more stringent traffic control measures.

The EIR presents several mitigation measures including transportation systems management (TSM) programs and increasing the planned number of through-and turn-lanes. The EIR cautions that enforcement of TSM programs by the City would be difficult. The City Traffic Engineer has indicated that the traffic "impacts of the two projects can be mitigated to an acceptable level of service by constructing over-sized roadways and several intersections comparable to Fair Oaks and Howe." However, the City Traffic Engineer cautions that "the intersection of West El Camino and the I-5 northbound offramp presents a serious problem that does not lend itself to solution by conventional widening and signalization " (Frink, 12/2/81).

Air Quality

The analysis of air quality impacts conducted for the EIR indicates that while the business park proposals would increase Carbon monoxide (CO) emissions at most receptor locations in the South Natomas area, the eight hour CO levels would not exceed state and federal standards. However, three intersections within the South Natomas planning area do show violations of the 8-hour standard at planning area buildout with and without the projects. These intersections are El Camino at Truxel, El Camino at Northgate and Garden Highway at Northgate. Cumulatively, Natomas Eastside's and Gateway Centre's generated gross emissions (including carbon dioxides and particulates) would represent a 130% increase over the emissions generated as a result of the Community Plan's designated land uses.

In 1977, the Sacramento Air Quality Maintenance Area was designated a non-attainment area for ozone and carbon monoxides. In response, SACOG has drafted an Air Quality Plan proposing control strategies to attain pollutant standards by 1987. The Plan's strategies are based on the assumption that land uses in South Natomas will reflect those designated on the 1978 Community Plan. Analysis of Natomas Eastside and Gateway Centre indicate that the proposed projects' emissions would add an additional 1.4 to 3 percent gross regional emissions. This approximately 2% increment would contribute in preventing Sacramento area from meeting the 1987 attainment goal set forth in the Draft Air Quality Plan.

Employment, Population and Housing

The EIR Estimates that Natomas Eastside will generate 9,600 new direct jobs and as many as the equivalent number of indirect jobs. While the new source of employment would assist in alleviating the area's SMSA unemployment rate, the project would displace 575 residential units at the same time that it created a demand for additional housing units. Cumulatively, Natomas Eastside and Gateway Centre are estimated to generate 24,000 to 32,000 jobs, to

displace approximately 1800 residential units, and to create a demand for an additional 5,000 to 9,000 housing units.

When combined with Creekside Office Park, the estimated number of jobs generated increases to as many as 37,000 with approximately 2700 housing units displaced and a demand for an additional 6,000 to 10,500 residences. The combined displaced residential units plus the additional units required to meet the housing demands of the three projects represent 45% of the total number of housing units designated in the South Natomas Community Plan. South Natomas has provided Sacramento with diversified housing in the median price range. Condominiums, townhouses, halfplexes, patio homes and single family detached units have been selling in the low end of the median price range for the Sacramento area. The project may adversely affect the price of housing in South Natomas in the following ways: 1) Creating a demand for residences by generating new jobs while reducing the supply of dwelling units via displacement of units may prompt an increase in housing costs; 2) Property values may increase on those parcels adjacent to the project site, thereby inflating the cost of housing, and 3) Because of sewer capacity limitations in South Natomas, attempting to increase densities on the remaining unmapped parcels might affect the cost of housing in South Natomas as a result of the expense required to expand the sewer capacity.

Public Services and Fiscal Impacts

The fiscal analysis in the EIR concluded that the project, in conjunction with Gateway Centre, would have the following impacts: a reduction in police service demands, an insignificant change in fire protection costs, an increase in road and traffic signal maintenance needs, an increase in drainage costs (to be borne by developer), a decrease in parkland dedication/fees, a reduction of one school and a land use pattern less amenable to efficient transit service.

The analysis indicates that with the exception of state subvention revenues (-\$41,000) and federal general revenue sharing and community development block grants (-\$20,000) annual property tax revenues (+\$1.10 Million) and annual sales tax revenues (+\$64,000) would increase as a result of Natomas Eastside. Estimated one-time construction excise tax revenues would increase by \$926,000 while one-time building permit fees would increase by \$60,000. The project would appear to result in a net increase in one-time revenues compared to the Community Plan. Annual project revenues would exceed operating costs compared with the Community Plan.

Economic Growth and Business Park Demand

The City recognizes a demand for suburban business parks exists and the EIR acknowledges that from a marketing viewpoint, the proposed project location appears to be a good real estate prospect. However, the City is interested in directing business park development in locations that will provide the least number of adverse impacts. The proposed 1.9 million square feet of office would result in a "drag" on the 2.6 million square feet of private office space existing in the downtown and

3 million square feet currently under construction or proposed in the downtown. A minimum of 2.1 million square feet is available or proposed in the Point West, Arden Park, and Southwest Five suburban office parks alone. The competition of Natomas Eastside could result in a decline in the absorption of existing and proposed square footage in suburban office parks and office structures in the Central Business District.

The rather severe traffic impacts have been noted earlier in the report as have air quality impacts. It would seem prudent to direct business park development to sites with closer proximity to the light rail lines and to those areas located farther from the Central Business District where residential development has been increasing without associated employment centers.

Conclusion

Natomas Eastside will impact the South Natomas community and the City of Sacramento. While generating new jobs, the project will displace residential units in an area designed to provide diversified, close-in housing to Sacramento's regional employment center, the Central Business District, and will create a demand for additional housing units. Unacceptable levels of service E and F will result at three critical intersections--Natomas-Oaks Drive/West El Camino Avenue, I-5 Northbound Offramp/West El Camino Avenue, and I-5 Southbound Offramp/Garden Highway.

A study of the cumulative effects of Natomas Eastside and Gateway Centre indicate that an increase in displaced residences, in demand for additional dwelling units, and in the number of roadways at unacceptable levels of service results. The increased vehicle emissions from both projects will inhibit the Sacramento area from meeting its 1987 attainment goal set forth in the Draft Air Quality Plan. Natomas Eastside is contrary to a number of goals and objectives adopted in the 1978 South Natomas and 1980 Central City Community Plans, including those emphasizing higher residential densities in South Natomas and continued revitalization of the Central Business District. The project is inconsistent with the 1980 Housing Element which sets forth goals to attain a sufficient housing supply to assure existing and future residents of a safe and sanitary dwelling at an affordable price.

STAFF RECOMMENDATION:

Staff recommends that the Planning Commission

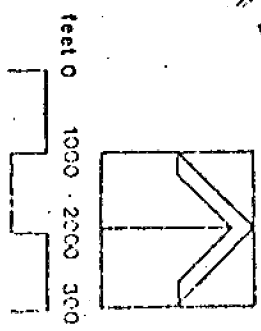
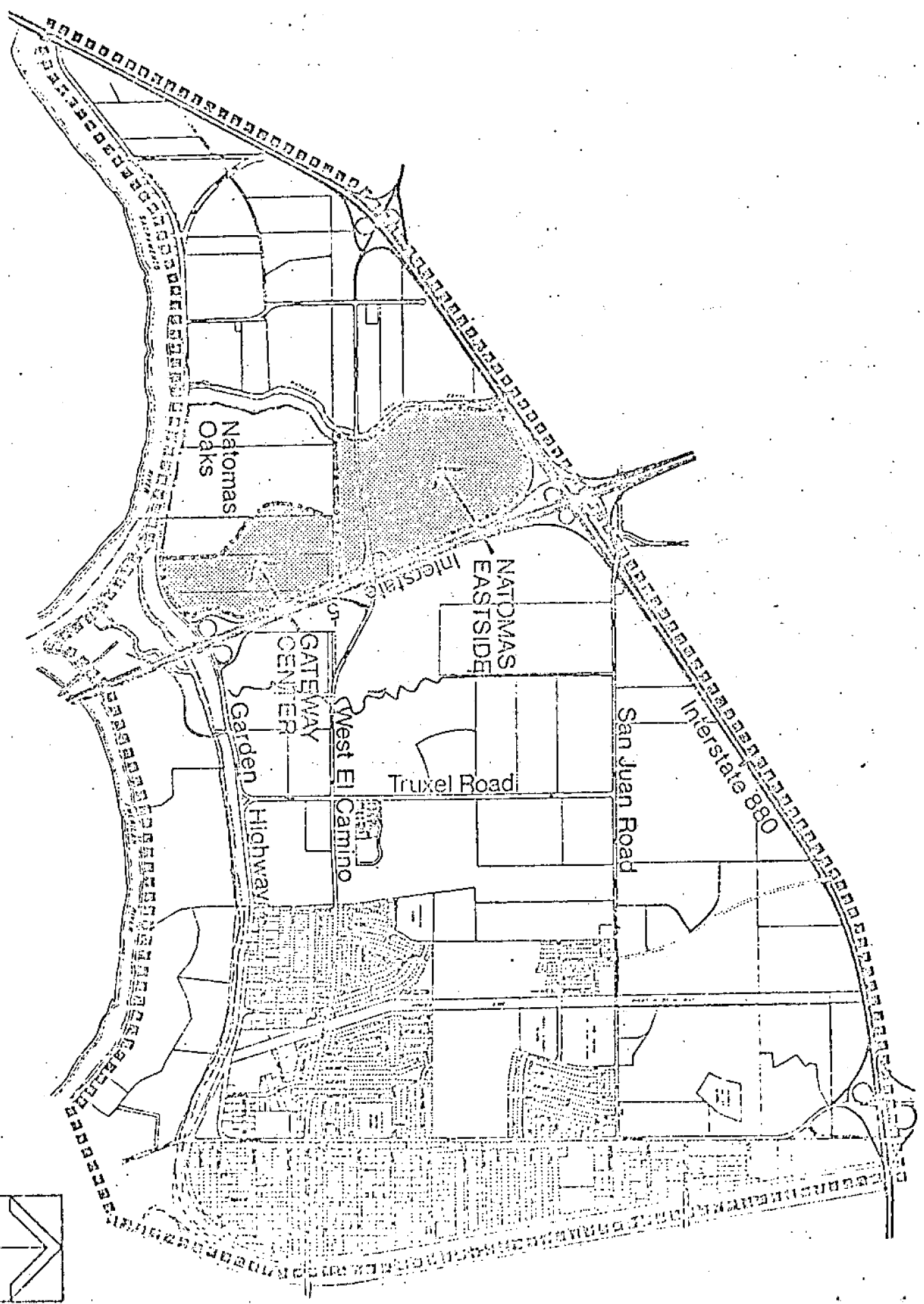
1. Determine that the Final EIR is adequate.
2. Certify that the EIR has been prepared in compliance with CEQA and that the City Planning Commission has considered the information contained in the Final EIR.
3. Determine that the project will have a significant effect on the environment, in that:
 - a. the project has the potential to degrade the quality of the environment because

- i. the land uses will result in increased vehicular traffic resulting in less than acceptable levels of service on roadways and a deteriorating of air quality due to increased auto emissions; and
 - ii. the project will be growth inducing by creating a demand for secondary commercial/office/distribution uses and by encouraging similar business park developments within the community plan area; and
 - iii. the project will reduce residential units in a community plan area where higher housing densities were designated to reduce development pressure on urban reserve and permanent agricultural lands to the north of I-880.
- b. The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals because
- i. the project provides additional employment opportunities while displacing planned residential units and increasing the demand for residential units;
 - ii. the project provides additional primary and secondary employment opportunities while increasing vehicular traffic congestion and deteriorating air quality;
 - iii. the project will provide additional employment opportunities but encourage similar business park development which will result in greater vehicle movements and greater deterioration of air quality.
- c. the project has possible environmental effects which are individually limited but cumulatively considerable because:
- i. the project will increase vehicle miles traveled and result in less than acceptable levels of service at three critical intersections. Combined with Gateway Center, three critical intersections achieve less than acceptable levels of service;
 - ii. the project will displace residential units while creating a demand for additional housing. Cumulatively Natomas Eastside and Gateway Centre will displace approximately 1,800 units, 8 percent of the residential holding capacity of the Natomas community while creating a demand for as many as 9,000 additional units, 39 percent of the dwellings called for in the South Natomas Community Plan.
- d. The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly:
- i. the project will result in deteriorating air quality at the project site. Combined Natomas Eastside and Gateway Centre projects will result in a 130 percent increase in gross emissions over South Natomas Community Plan designated land uses for the project sites.

4. Recommend denial of the amendment to the 1974 General Plan from Residential to commercial and offices and to delete a school site.
5. Recommend denial of the amendments to the 1978 South Natomas Community Plan from residential - 22 av to commercial-shopping center and to business and professional offices; from residential-7 av. to residential - 22 av and business and professional offices, relocation of a fire station, deletion of a school site, and to add an additional intersection onto West El Camino Avenue.
6. Recommend denial of the PUD as proposed by the applicant because the proposed land uses are inconsistent with the 1978 South Natomas Community Plan. Recommend approval of a PUD designation in concept for the residential, commercial-shopping center and business and professional land uses as designated on the 1978 South Natomas Community Plan based on the following findings of fact:
 - a. The PUD as recommended will be consistent with the goals and objectives of the zoning ordinance (Section 8) as it will encourage the design of residential, convenience shopping facilities and offices in a well-designed and coordinated site development;
 - b. the PUD as recommended is consistent with the land uses designated on the 1978 South Natomas Community Plan; and
 - c. the PUD as recommended will not be injurious to public welfare nor to other property in the vicinity of the development as appropriate height and area requirements and parking standards will be supplied to the development.
7. Approval of the request to initiate a rezoning from Agriculture (A) to Office Building OB-RUD (19 + acres) and to shopping center SC-PUD (26 + acres) at the locations designated on the South Natomas Community Plan and denial of the remaining rezoning requests.

PROJECT VICINITY

SOUTH NATOMAS COMMUNITY PLAN AREA



| LAND USE TYPE | ACRES | PERCENT |
|-----------------------------|-------|---------|
| RESIDENTIAL (SINGLE-FAMILY) | 10.0 | 10.0 |
| RESIDENTIAL (MULTI-FAMILY) | 10.0 | 10.0 |
| OFFICE | 10.0 | 10.0 |
| COMMERCIAL | 10.0 | 10.0 |
| INDUSTRIAL | 10.0 | 10.0 |
| RECREATION | 10.0 | 10.0 |
| OPEN SPACE | 10.0 | 10.0 |
| TOTAL | 100.0 | 100.0 |



**NATOMAS
EASTSIDE
LAND USE PLAN**



CITY OF SACRAMENTO

13

CITY PLANNING DEPARTMENT
927 TENTH STREET
SUITE 300
SACRAMENTO, CA 95814
TELEPHONE (916) 449-5604

MARTY VAN DUYN
PLANNING DIRECTOR

December 28, 1981

City Council
Sacramento, CA

Honorable Members in Session:

- SUBJECT:
1. Environmental Impact Report.
 2. Amend 1974 General Plan from residential (90+ ac.) to commercial and offices.
 3. Amend 1978 South Natomas Community Plan from residential-9.7 av. to business and professional offices (75+ net ac.) and commercial-shopping center (10+ net ac.).
 4. Amend Natomas Oaks PUD from multiple family residential-23 av. to business park (30+ ac.); from cluster residential-11 av. to business park (35+ ac.); from cluster residential-8.5 av. to business park (25+ ac.) and rename 90+ ac. to Gateway Centre PUD.
 5. Appeal of Planning Commission's denial to Initiate Rezoning for 90+ vac. ac. from Townhouse (Planned Unit Development) R-1A(PUD) and Light Density Multiple Family (Planned Unit Development) R-3(PUD) to Office Building (Planned Unit Development) OB(PUD), or more restrictive zoning (75+ net ac.) and General Commercial (Planned Unit Development) C-2(PUD), or more restrictive zoning (10+ net ac.). (P-9145)

LOCATION: North of Garden Highway, east of Natomas Oaks Drive, south of West El Camino and west of I-5. (Gateway Centre)

SUMMARY

In 1978, the City Council adopted the South Natomas Community Plan. The plan promoted higher residential densities to provide close-in housing to the Central Business District.

In 1979, the City Council approved a Natomas Oaks PUD that provides 2,300 residential units in a variety of housing types, including single family detached, halfplexes/duplexes, patio homes, townhouses/condominiums and apartments. The proposed project, Gateway Centre, would introduce a major regional office park and would displace approximately 1,200 townhouse-condominium and apartment units.

The Planning Commission recommended denial of the entitlements not consistent with the South Natomas Community Plan.

The staff report to the Planning Commission, voting records, and appeal are attached for the Council's information.

VOTE OF PLANNING COMMISSION

On December 17, 1981, the Planning Commission recommended denial of the General and Community Plan Amendments, amending the Natomas Oaks PUD and Denied the Initiate to Rezone for requests not consistent with the Community Plan by a vote of six ayes, one no and two abstentions.

RECOMMENDATION

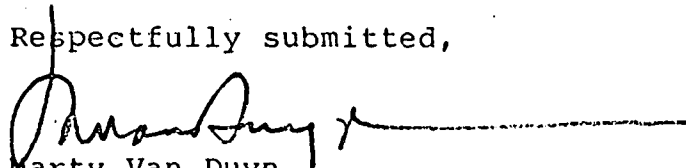
The staff and Planning Commission recommend the following:

1. Determine that the Final EIR is adequate.
2. Certify that the EIR has been prepared in compliance with CEQA and that the City Planning Commission has considered the information contained in the Final EIR.
3. Determine that the project will have a significant effect on the environment based on the findings included in the staff report to the Planning Commisison.
4. Deny the amendment to the 1974 General Plan from residential to commercial and offices.
5. Deny the amendment to the 1978 South Natomas Community Plan from residential 9.7 av. to business and professional offices and commercial-shopping center.
6. Deny the amendment to the Natomas Oaks PUD from residential to business park development and to rename 90+ acres to Gateway Centre PUD because the proposed land uses are inconsistent with the 1978 South Natomas Community Plan.

December 28, 1981

7. Deny the Appeal of Planning Commission's denial of the request to Initiate a Rezone of 90+ acres from Light Density Multiple Family (R-3 PUD) and Townhouse (R-1A PUD) to Office Building (OB PUD) and General Commercial (C-2 PUD).

Respectfully submitted,



Marty Van Duyn
Planning Director

FOR CITY COUNCIL INFORMATION
WALTER J. SLIPE
CITY MANAGER

MVD:CC:lo
Attachments
P-9145

January 5, 1982
District No. 1

SACRAMENTO CITY PLANNING COMMISSION

MEETING DATE

12/17/81ITEM NO. 2FILE NO. P- 9114& P-9145GENERAL PLAN AMENDMENT ☐TENTATIVE MAP ☐COMMUNITY PLAN AMENDMENT ☐SUBDIVISION MODIFICATION ☐REZONING ☐ENVIRONMENTAL DET. ☒SPECIAL PERMIT ☐OTHER FINAL EIRVARIANCE ☐SR. NATHAN'S BUSINESS
PARK PROPOSALS

Recommendation:

LOCATION:

WEST OF INTERSTATE 5 NORTH OF GARDEN
AVENUE & SACRAMENTO RIVER☒ Favorable☐ Unfavorable☐ Petition☐ Correspondence

NAME

PROPOSERS
APPLICANTS

ADDRESS

WILLIAM MULLIGAN (ATTY FOR APPLICANT P-9114) 555 CAPITOL MALL, SACRAMENTOJACK DIEPENBRACKE (ATTY FOR APPLICANT P-9145) 455 CAPITOL MALL STE 800 "

NAME

~~APPLICANTS~~
OPPOSERS

ADDRESS

MOTION NO. 1

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|---------|----|--------|-----|
| Augusta | ✓ | | | |
| Fong | ABSTAIN | | | |
| Goodin | | ✓ | | |
| Holloway | ABSTAIN | | | |
| Hunter | ✓ | | ✓ | |
| Larson | ✓ | | | |
| Muraki | ✓ | | | |
| Silva | ✓ | | | ✓ |
| Simpson | ✓ | | | |

☐ TO APPROVE☐ TO DENY☐ TO APPROVE SUBJECT TO COND. & BASED ON
FINDINGS OF FACT IN STAFF REPORT☐ INTENT TO APPROVE SUBJ. TO COND. & BASED
ON FINDINGS OF FACT DUE _____☐ TO RECOMMEND APPROVAL
& FORWARD TO CITY COUNCIL☐ TO RATIFY NEGATIVE DECLARATION☐ TO CONTINUE TO _____ MEETING☒ OTHER per staff recommendation

SACRAMENTO CITY PLANNING COMMISSION

MEETING DATE

12/17/81

ITEM NO.

2

FILE NO.

P-9114

M-

GENERAL PLAN AMENDMENT

☒

TENTATIVE MAP

☐

COMMUNITY PLAN AMENDMENT

☒

SUBDIVISION MODIFICATION

☐

REZONING (INITIATE)

☒

ENVIRONMENTAL DET.

☐

SPECIAL PERMIT

☐OTHER ESTABLISH NATOMAS

VARIANCE

☐EASTSIDE PUD

Recommendation:

LOCATION: NE Quadrant of I-5 North + South of West
ELCAMP RD east of Main Bridge. Corner of W of I-5
"NATOMAS EASTSIDE"☐ Favorable☒ Unfavorable☐ Petition☒ Correspondence

PROPOSERS

NAME

ADDRESS

WILLIAM HOLLIMAN (ATTY FOR APPLICANT)

555 CAPITAL MALL SACRAMENTO

OPPOSERS

NAME

ADDRESS

SEE LIST FROM P-9145 (Comments taken in common
with both projects P-9114 and P-9145)

MOTION NO.

2

MOTION:

| | YES | NO | MOTION | 2ND |
|----------|---------|----|--------|-----|
| Augusta | ✓ | | | |
| Fong | ABSTAIN | | | |
| Goodin | | ✓ | | |
| Holloway | ABSTAIN | | | |
| Hunter | ✓ | | ✓ | |
| Larson | ✓ | | | |
| Muraki | ✓ | | | |
| Silva | ✓ | | | ✓ |
| Simpson | ✓ | | | |

☐ TO APPROVE☐ TO DENY☐ TO APPROVE SUBJECT TO COND. & BASED ON
FINDINGS OF FACT IN STAFF REPORT☐ INTENT TO APPROVE SUBJ. TO COND. & BASED
ON FINDINGS OF FACT DUE☐ TO RECOMMEND APPROVAL

& FORWARD TO CITY COUNCIL

☐ TO RATIFY NEGATIVE DECLARATION☐ TO CONTINUE TO

MEETING

☒ OTHER per staff recommendation w/approval for parts of ordinance - 5

MEETING DATE 12/17/81
 ITEM NO. 2 FILE NO. P-9145
 M-

GENERAL PLAN AMENDMENT ☒ TENTATIVE MAP ☐
 COMMUNITY PLAN AMENDMENT ☒ SUBDIVISION MODIFICATION ☐
 REZONING (INITIATE) ☒ ENVIRONMENTAL DET. ☐
 SPECIAL PERMIT ☐ OTHER Amend PUD NATALIS
 VARIANCE ☐ OAKS FROM RESIDENTIAL TO
BUSINESS PARK AND COMMERCIAL

Recommendation:

☐ Favorable☒ Unfavorable☐ Petition☒ Correspondence

LOCATION: NE Quad of I-5 North of Garden Highway and
521st South of West El Camino
"GATEWAY CENTER"

PROPOSERS

NAME

ADDRESS

JOHN DIEPENBROEK (ATTY FOR APPLICANT) 455 CAPITOL MALL STE. 800 SACRAMENTO

LEE SAMMIS LEE SAMMIS CO. 1451 RIVER PARK DR. SACRAMENTO, CA

BOB FOUNTAIN CSUS ECON CONSULTANT PROF CSUS SACRAMENTO

KAREN AHERN 455 CAPITOL MALL STE 800 SACRAMENTO

CHARLES ABRAMS JHK CONSULTANTS (TRAFFIC)

MELU SMITHKOVICH Sunset Const, INC. 2121 TOWNE CNTR ANAHEIM, CA 92801

SILIP ~~WON~~ WONS COLDWELL BANKER CO. SACRAMENTO, CA

TOM AGUER BROWN STEVENS CONSULTANTS SACRAMENTO, CA

NAME

ADDRESS

ROBERT DOYLE SO. NATALIS COMMUNITY ASSOC.

ROGER DICKINSON ECOS 909 12th ST. SACRAMENTO, CA

HEATHER FARCO RESIDENT SO. NATALIS

JANET HUDDLE SAVE THE AMER. RIVER ASSOC. (SARA)

JERRY PIO PLUMBERWOOD COURT SACRAMENTO

RAY TRETHEWAY 520 GARDEN HIGHWAY SACRAMENTO, CA

DON FOREL 1780 TRAIL END WAY SACRAMENTO, CA

"NEUTRAL" JAMES B. GOOD CITY TRAFFIC ENG.

MOTION NO. 3

| | YES | NO | MOTION | 2ND |
|----------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Augusta | <input checked="" type="checkbox"/> | | | |
| Fong | ABSTAIN | | | |
| Goodin | | <input checked="" type="checkbox"/> | | |
| Holloway | ABSTAIN | | | |
| Hunter | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | |
| Larson | <input checked="" type="checkbox"/> | | | |
| Muraki | <input checked="" type="checkbox"/> | | | <input checked="" type="checkbox"/> |
| Silva | <input checked="" type="checkbox"/> | | | |
| Stepson | <input checked="" type="checkbox"/> | | | |

- ☐ TO APPROVE
- ☐ TO DENY
- ☐ TO APPROVE SUBJECT TO COND. & BASED ON FINDINGS OF FACT IN STAFF REPORT
- ☐ INTENT TO APPROVE SUBJ. TO COND. & BASED ON FINDINGS OF FACT DUE _____
- ☐ TO RECOMMEND APPROVAL _____ & FORWARD TO CITY COUNCIL
- ☐ TO RATIFY NEGATIVE DECLARATION
- ☐ TO CONTINUE TO _____ MEETING
- ☒ OTHER per Staff recommendation

NOTICE OF APPEAL OF THE DECISION OF THE
SACRAMENTO CITY PLANNING COMMISSION

CITY PLANNING COMMISSION

DATE: December 23, 1981

DEC 23 1981

TO THE PLANNING DIRECTOR:

RECEIVED

I do hereby make application to appeal the decision of the City
Planning Commission of December 17, 1981 when:
(Date)

X Rezoning Application Variance Application
 Special Permit Application

was: Granted X Denied by the Commission

GROUND FOR APPEAL: The Commission failed to weigh the significant
benefits Gateway Centre offers the City of Sacramento, in particular
the project's impact on local unemployment, its potential to help
diversify Sacramento's economic base, its substantial fiscal benefits
and the desirability of providing a site which can attract major new
businesses to Sacramento.

PROPERTY LOCATION: The northwest quadrant of I-5, north of Garden
Highway and 550⁺ feet south of West El Camino Avenue
PROPERTY DESCRIPTION:

90⁺ acres presently undeveloped

ASSESSOR'S PARCEL NO. 274 - 320 - 09

PROPERTY OWNER: Gateway Center Associates

ADDRESS: 1451 River Park Drive, Suite 110, Sacramento, CA 95815

APPLICANT: Gateway Center Associates/Lee Sammis Company

ADDRESS: 1451 River Park Drive, Suite 110, Sacramento, CA 95815

APPELLANT: Karen O. Ahern

(SIGNATURE)

455 Capitol Mall #800

ADDRESS: DIEPENBROCK, WULF, PLANT & HANNEGAN Sacramento, CA 95814

FILING FEE: \$60.00

RECEIPT NO. 689

FORWARDED TO CITY CLERK ON DATE OF:

P- 9145

7/80

(4 COPIES REQUIRED)

CITY PLANNING COMMISSION

927 10th St. - SACRAMENTO, CALIFORNIA 95814

APPLICANT John V. Diepenbrock c/o Diepenbrock, Wulff, Plant, Hannegan, 455 Capitol Mall
 OWNER Lee Sammis Co., 1451 River Park Drive, Ste. 110, Sacramento, CA 95815 Suite 800
 PLANS BY Leason Pomeroy Associates
 FILING DATE 9-5-80 AB-884:2/3/82 REPORT BY CC:DP:bw
 Application complete: 9/19/80 EIR Req: 12-29-80 ASSESSOR'S PCL. NO. 274-320-09

- APPLICATION:
1. Certification of the Final EIR
 2. Amend 1974 General Plan from residential to commercial and offices (90+ acres)
 3. Amend 1978 South Natomas Community Plan from residential 9.7 av to business and professional offices (75+ acres) and commercial-shopping center (10+ acres)
 4. Amend Natomas Oaks PUD from residential to business park development and to rename 90+ acres to Gateway Centre PUD
 5. Initiate a rezone of 90+ vacant acres from Light Density Multiple Family (R-3 PUD) and Townhouse (R-1A PUD) to Office Building (OB PUD) and General Commercial (C-2) or more restrictive zoning

LOCATION: The northwest quadrant of I-5, north of Garden Highway and 550+ feet south of West El Camino Avenue.

PROPOSAL: The applicant is requesting the necessary entitlements to establish a PUD consisting of 75+ acres (1.45 million square feet) of office and 10+ acres (75,000 square feet) of commercial.

PROJECT INFORMATION:

| | <u>EXISTING</u> | <u>PROPOSED</u> |
|-------------------------------|--|---|
| General Plan Designation: | Residential | Commercial and Offices |
| South Natomas Community Plan: | Residential 9.7 av | Business and Professional Offices and Commercial |
| PUD Designation: | Multiple Family Residential & Cluster Residential | Business Park |
| Zoning: | Light Density Multiple Family (R-3 PUD) and Townhouse (R-1A PUD) | Office Building (OB PUD) and General Commercial (C-2) |
| Existing Land Use: | Agricultural | |

Surrounding Land Use and Zoning:

North: Agricultural (A)
South: Garden Highway, Sacramento River (FF,FW)
East: I-5 and Agricultural (A, R-2A PUD, R-2B PUD, R-3 PUD)
West: Agricultural (R-1 PUD, R-1A PUD, R-2 PUD)

STAFF EVALUATION: On October 1, 1981, the Planning Commission reviewed the Draft Environmental Impact Report (DEIR) and forwarded it to the Environmental Coordinator for preparation of the Final EIR (FEIR). The FEIR consists of the Draft EIR and the Addendum containing responses to comments received on the Draft. The Addendum was distributed on November 10, 1981, to persons and organizations who commented on the DEIR.

The EIR constitutes the environmental impact report for two projects, Natomas Eastside and Gateway Centre. Six land use alternatives, including the land uses designated by the South Natomas Community Plan and proposed by the applicants, were evaluated in the EIR. Creekside, a third office park proposal in South Natomas, is being evaluated in a separate EIR.

BACKGROUND INFORMATION: In 1977, an office proposal alternative representing a conceptual office development scheme along the west and east sides of I-5 north of the Garden Highway and south of West El Camino Avenue, was evaluated in the EIR prepared for the South Natomas Community Plan. The conceptual alternative encompassed 105 acres and comprised 3.5 million square feet in two-story office buildings. The Gateway Centre site represents a portion of the conceptual office proposal alternative. The South Natomas Community Plan EIR, certified in 1978, indicated that an office proposal would create major impacts on traffic congestion, noise and air quality. The environmental document also concluded that although the project would generate substantial revenues for the City, it would compete with and threaten the viability of the downtown central business district partly because of the close proximity of the two locales.

In 1978, the City Council adopted the South Natomas Community Plan. The plan promoted higher residential densities and a variety of housing types. The higher densities were designed to provide close-in housing to the Central City Core. The Core represents that area bounded by the Sacramento River and 16th, H and R Streets. The Central Business District and governmental offices are contained within the Core.

Besides designating residential density minimums in South Natomas to accommodate increased numbers of people and to retard the need for urban expansion to the north, the City Council adopted the following goals and objectives:

- Assure that new development is healthy and of long lasting benefit to the community;
- Prohibit the intrusion of incompatible land uses and disruptive traffic into new and existing residential areas;

- Limit commercial and office development to neighborhood and community services and retail sales. Do not permit regional scale developments, especially those which compete with the Central Business District of downtown Sacramento;
- Provide a balanced circulation system that serves local residents and through traffic with a minimum of congestion or conflict with residential neighborhoods, shopping areas and other land uses;
- Encourage development which promotes the conservation of fossil fuels and minimizes air, noise, and water pollution;
- Require the proponent of additional commercial and office development to clearly justify demand to the satisfaction of the Planning Commission and City Council. Such justification shall consider resident concerns, the cited standards pertaining to land and building space, vacancy rates and location criteria.

The Gateway Centre site represents one-third of the 270+ acre Natomas Oaks Planned Unit Development approved by the City Planning Commission and City Council in 1979. The residential PUD designated 2,300 residential units in a variety of housing types, including single family detached, halfplexes/duplexes, patio homes, townhouses/condominiums and apartments. The Gateway Centre portion of Natomas Oaks PUD is designated for approximately 1,200 townhouse-condominium and apartment units. The 1,200 residential units represent fifty percent of the total dwelling units to be provided in Natomas Oaks PUD.

Land Use

1. The proposed project, Gateway Centre, would alter the designated residential character of the South Natomas Community by introducing a major regional business park. The South Natomas Community Plan, adopted in February 1978, was designed to provide a close-in residential community, with neighborhood oriented commercial and office land uses, to support the Central City Core. At the time of adoption, the City determined that the higher densities provided in the plan would fulfill the social need for diversified housing in close proximity to the region's major employment center, the Central City Core and would reduce development pressure on prime agricultural land north of Interstate 880.

The residential densities and holding capacities adopted for the South Natomas area reflect a balancing of City-wide housing needs. Amendments to the planned residential capacity will effect not only the South Natomas community but other City of Sacramento communities as well. Most recently, the Central City Community Plan residential densities were adopted partially on the basis that South Natomas would play a major role in providing "close-in" housing.

The South Natomas Plan appears to be successful. Approximately twenty (20) percent of the residential units called for in the community plan have been built and occupied. The average number of dwelling units built and occupied annually during 1979 and 1980 has been 469 du/yr. In 1980, 1,501 units were tentatively approved for development. Presently, only twenty-five (25) percent of the residentially designated land in South Natomas remains unmapped. The South Natomas Community Plan area is developing as planned. The area provides a variety of housing types within the median price range for Sacramento at a locale in close proximity to the region's major employment center, the Central City.

2. Gateway Centre would displace approximately 1,200 residential units. This number represents five percent of the theoretical total holding capacity (23,046 du) of the South Natomas Community Plan and 50 percent of the Natomas Oaks PUD. The displacement is compounded by the additional demand for housing that will be created as a result of the new jobs, both direct and indirect, generated by the project. Additionally, the project may be growth inducing by encouraging similar business park proposals within the South Natomas Community Plan area. The City currently has two additional proposals submitted - Natomas Eastside and Creekside Office Park. Cumulatively, the three business parks would result in a net loss of approximately 2,700 residential units designated to support the Central City Core.

The cumulative impact of the reduced number of housing units is compounded by the corresponding increased demand for housing associated with new employment centers. Gateway Centre, Natomas Eastside and Creekside Office Park are anticipated to create a demand for an additional 6,000 - 10,500 units. This additional demand represents as much as forty-five percent of the units planned for all of South Natomas.

3. Office square footage and developable land designated for office use in suburban locations is existing in residentially developed and residentially developing areas in the City. For instance, developable land at the proposed Park Arden site and remaining developable parcels in Point West can provide 1.4 million square feet along Interstate 80. Southwest Five, a 600,000 square foot business park PUD, was recently approved in the Pocket area.

The removal of land designated for residential uses forces the cost of housing upward because available land supply becomes more limited. The findings of the Questor Affordable Housing Study, supported by the City Council, emphasized that each growth community and the City overall should have ample land available for residential uses in order to keep housing as affordable as possible. These findings are emphasized in the adopted 1980 Housing Element. The conversion of approximately 90 acres of residentially designated land to non-residential uses in the northern portion of the City, where further development would be restricted to infill because land north of South Natomas is designated urban reserve and permanent agriculture, will affect the supply of land and the affordability of housing.

There are areas of the City containing considerable amounts of vacant developable land designated for residential use where a job-housing link might be achieved without severely impacting housing affordability.

Traffic and Circulation

While the South Natomas Community Plan was being drafted, a great deal of attention was focused on traffic and circulation. In an effort to encourage transit patronage at residential buildout, the plan was designed to provide transit availability within a one-quarter mile radius of residences. Constraints with regard to freeway interchanges along I-5 were identified during preparation of the Community Plan. The Garden Highway/I-5 interchange provides for travel in all directions; however, four left turn movements are required. Due to Cal Trans' standards regarding minimum weaving distances between interchanges, the West El Camino Avenue/I-5 interchange lacks northbound ramps as a result of its proximity to the I-880/I-5 interchange. As indicated in the table below, with the exception of the I-5 southbound offramp at the Garden Highway, levels of service for the six critical intersections evaluated in the EIR at community plan buildout are within the acceptable range (e.g. A,B,C). However, to the east of I-5, the intersections of Azevedo and Truxel with West El Camino Avenue will be operating at unacceptable level of service E at PM peak at community plan buildout (Source: Creekside Draft EIR).

PEAK HOUR LEVEL OF SERVICE - COMMUNITY PLAN, NATOMAS EASTSIDE, AND GATEWAY CENTER PROJECTS

| Critical Intersections ^b | Levels of Service and Percent of Capacity Used ^a | | | | | | | |
|---|---|---------|------------------|---------|----------------|---------|---------------|---------|
| | South Natomas Community Plan | | Natomas Eastside | | Gateway Center | | Both Projects | |
| | AM Peak | PM Peak | AM Peak | PM Peak | AM Peak | PM Peak | AM Peak | PM Peak |
| Natomas Oaks Drive/ West El Camino | B/62 | C/77 | F/114 | F/141 | D/85 | E/90 | F/119 | F/142 |
| I-5 Northbound Off Ramp/West El Camino | A/43 | B/59 | E/90 | B/62 | C/67 | B/62 | F/115 | C/73 |
| Natomas Oaks Drive/ Garden Highway | A/38 | A/44 | A/41 | A/47 | A/38 | B/64 | A/42 | C/72 |
| Orchard/West El Camino | A/46 | A/52 | B/56 | B/63 | A/48 | B/56 | B/58 | C/67 |
| I-5 NB Off Ramp/ Garden Highway | A/48 | B/56 | B/59 | B/62 | A/54 | C/67 | B/65 | C/73 |
| I-5 SB Off Ramp/ Garden Highway | C/72 | D/80 | E/99 | E/93 | E/99 | F/108 | F/126 | F/122 |

Source: CH2M HILL, October 14, 1981.

^aLevel of service (LOS) shown in letter designation followed by percent of roadway capacity used (e.g., B/62). For definition of LOS, see Table 25 in SNBP Draft EIR.

^bAssumed minimum set of intersection improvements defined in South Natomas Business Park Draft EIR.

As indicated in the table, the project would result in unacceptable levels of service at three intersections. Cumulatively, Gateway Centre and Natomas Eastside would result in the unacceptable level of service F at three critical intersections. The combined projects would more than double the average daily trip rate from the project sites from 32,500 ADT to 74,600 ADT and would increase South Natomas community-wide traffic volumes by 18.5 percent. With both projects, PM peak hour outbound traffic from the project sites would increase by 230 percent, while AM peak hour inbound would increase by 25 percent. Cal Trans has cautioned that the amount of traffic generated by the South Natomas Community Plan at residential buildout alone will warrant ramp metering and high occupancy vehicle ramp bypass land strategies along I-5 (Trombatore, 8/25/81). The proposed project would therefore compound congestion and require more stringent traffic control measures.

The EIR presents several mitigation measures, including transportation systems management (TSM) programs and increasing the planned number of through-and turn-lanes. The EIR cautions that enforcement of TSM programs by the City would be difficult. The City Traffic Engineer has indicated that the traffic "impacts of the two projects can be mitigated to an acceptable level of service by constructing over-sized roadways and several intersections comparable to Fair Oaks and Howe." However, the City Traffic Engineer cautions that "the intersection of West El Camino and I-5 northbound offramp presents a serious problem that does not lend itself to solution by conventional widening and signalization" (Frink, 12/2/81).

Air Quality

The analysis of air quality impacts conducted for the EIR indicates that while the business park proposals would increase carbon monoxide (CO) emissions at most receptor locations in the South Natomas area, the eight hour CO levels would not exceed state and federal standards. However, three intersections within the South Natomas planning area do show violations of the eight-hour standard at planning area buildout with and without the projects. These intersections are El Camino at Truxel, El Camino at Northgate and Garden Highway at Northgate. Cumulatively, Gateway Centre's and Natomas Eastside's generated gross emissions (including carbon monoxide, nitrogen oxides, total hydrocarbons, sulfur dioxides and particulates) would represent a 130 percent increase over the emissions generated as a result of the Community Plan's designated land uses.

In 1977, the Sacramento Air Quality Maintenance Area was designated a non-attainment area for ozone and carbon monoxides. In response, SACOG has drafted an Air Quality Plan proposing control strategies to attain pollutant standards by 1987. The Plan's strategies are based on the assumption that land uses in South Natomas will reflect those designated on the 1978 Community Plan. Analysis of Gateway Centre and Natomas Eastside indicates that the proposed projects' emissions would add an additional 1.4 to 3 percent gross regional emissions. This approximately two percent increment would contribute in preventing the Sacramento area from meeting the 1987 attainment goal set forth in the Draft Air Quality Plan.

Employment, Population and Housing

The EIR estimates that Gateway Centre will generate 6,200 new direct jobs and as many as the equivalent number of indirect jobs. While the new source of employment would assist in alleviating the area's SMSA unemployment rate, the project would displace 1,200 residential units at the same time that it created a demand for additional housing units. Cumulatively, Gateway Centre and Natomas Eastside are estimated to generate 24,000 to 32,000 jobs, to displace approximately 1,800 residential units, and to create a demand for an additional 5,000 to 9,000 housing units.

When combined with Creekside Office Park, the estimated number of jobs generated increases to as many as 37,000 with approximately 2,700 housing units displaced and a demand for an additional 6,000 to 10,500 residences. The combined displaced residential units, plus the additional units required to meet the housing demands of the three projects, represent 45 percent of the total number of housing units designated in the South Natomas Community Plan.

South Natomas has provided Sacramento with diversified housing in the median price range. Condominiums, townhouses, half-lexes, patio homes and single family detached units have been selling in the low end of the median price range for the Sacramento area. The project may adversely affect the price of housing in South Natomas in the following ways: 1) creating a demand for residences by generating new jobs while reducing the supply of dwelling units via displacement of units may prompt an increase in housing costs; 2) property values may increase on those parcels adjacent to the project site, thereby inflating the cost of housing; 3) because of sewer capacity limitations in South Natomas, attempting to increase densities on the remaining unmapped parcels might affect the cost of housing in South Natomas as a result of the expense required to expand the sewer capacity.

Public Services and Fiscal Impacts

The fiscal analysis in the EIR concluded that the project, in conjunction with Natomas Eastside, would have the following impacts: a reduction in police service demands, an insignificant change in fire protection costs, an increase in road and traffic signal maintenance needs, an increase in drainage costs (to be borne by developer), a decrease in parkland dedication fees, a reduction of one school and a land use pattern less amenable to efficient transit service.

The analysis indicates that, with the exception of state subvention revenues (-\$63,000) and federal general revenue sharing and community development block grants (-\$31,000), annual property tax revenues (+\$690,000) and annual sales tax revenues (+\$371,000) would increase as a result of Gateway Centre. Estimated one-time construction excise tax revenues would increase by \$753,000, while one-time building permit fees would increase by \$34,000. The project would appear to result in a net increase in one-time revenues compared to the Community Plan. Annual project revenues would exceed operating costs compared with the Community Plan.

Economic Growth and Business Park Demand

The City recognizes a demand for suburban business parks exists, and the EIR acknowledges that from a marketing viewpoint, the proposed project location appears to be a good real estate prospect. However, the City is interested in directing business park development in locations that will provide the least number of adverse impacts. The proposed 1.45 million square feet of office would result in a "drag" on the 2.6 million square feet of private office space existing in the downtown and three million square feet currently under construction or proposed in the downtown. A minimum of 2.1 million square feet is available or proposed in the Point West, Arden Park, and Southwest Five suburban office parks alone. The competition of Gateway Centre could result in a decline in the absorption of existing and proposed square footage in suburban office parks and office structures in the Central Business District.

The rather severe traffic impacts have been noted earlier in the report as have air quality impacts. It would seem prudent to direct business park development to sites already available for development, to those with close proximity to light rail lines, and to those areas located farther from the Central Core where residential development is existing or has been increasing without associated employment centers.

Conclusion

Gateway Centre will impact the South Natomas community and the City of Sacramento. While generating new jobs, the project will displace residential units in an area designed to provide diversified, close-in housing to Sacramento's regional employment center, the Central Core, and will create a demand for additional housing units. Unacceptable levels of service D, E and F will result at three critical intersections - Natomas Oaks Drive/West El Camino Avenue, Natomas Oaks Drive/Garden Highway, and I-5 southbound offramp/Garden Highway.

A study of the cumulative effects of Gateway Centre and Natomas Eastside indicates that an increase in displaced residences, in demand for additional dwelling units, and in the number of roadways at unacceptable levels of service results. The increased vehicle emissions from both projects will inhibit the Sacramento area from meeting its 1987 attainment goal set forth in the Draft Air Quality Plan.

Gateway Centre is contrary to a number of goals and objectives in the 1978 South Natomas and 1980 Central City Community Plans, including those emphasizing higher residential densities in South Natomas and continued revitalization of the Central Business District. The project is inconsistent with the 1980 Housing Element which sets forth goals to attain a sufficient housing supply to assure existing and future residents of a safe and sanitary dwelling at an affordable price.

STAFF RECOMMENDATION: Staff recommends that the Planning Commission:

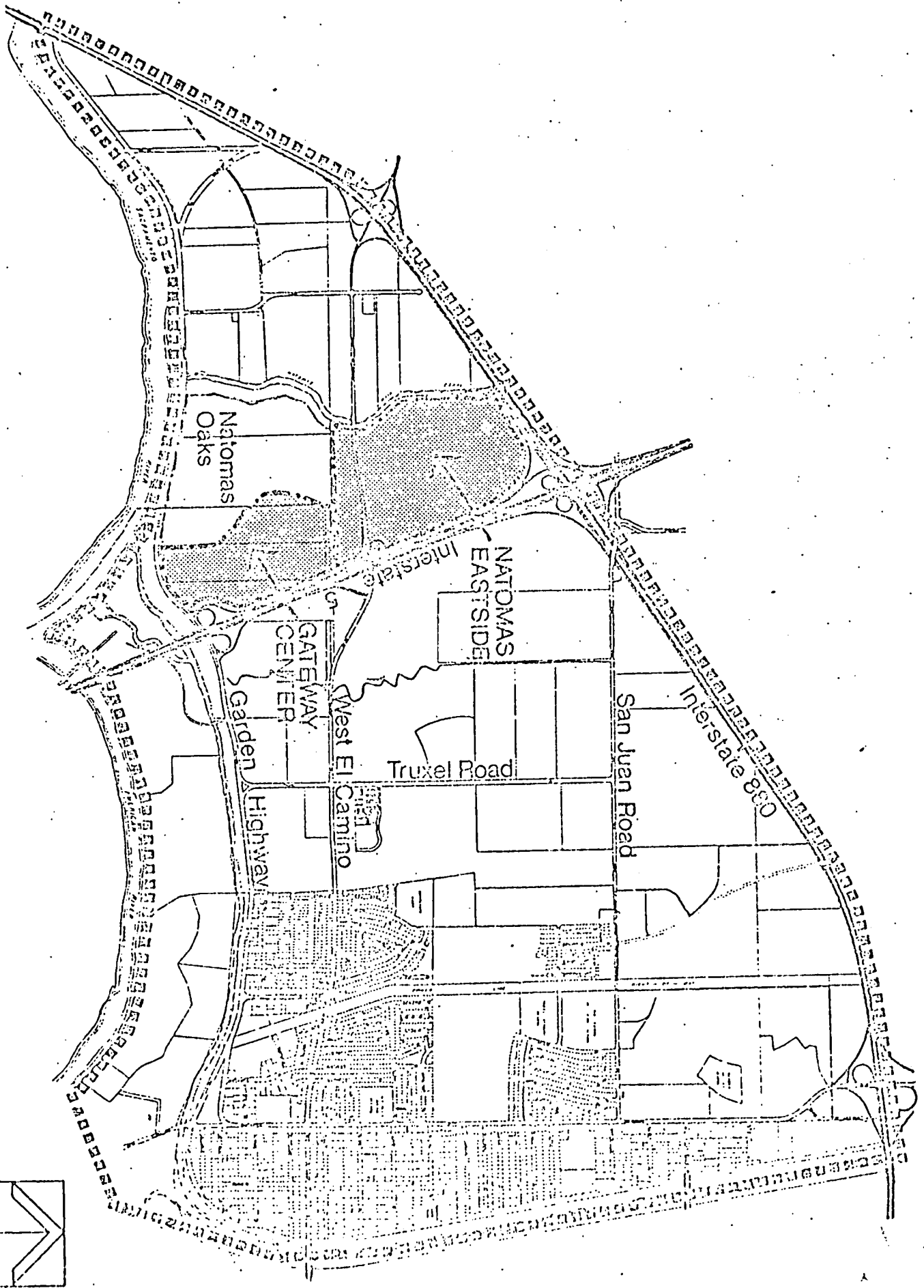
1. Determine that the Final EIR is adequate.

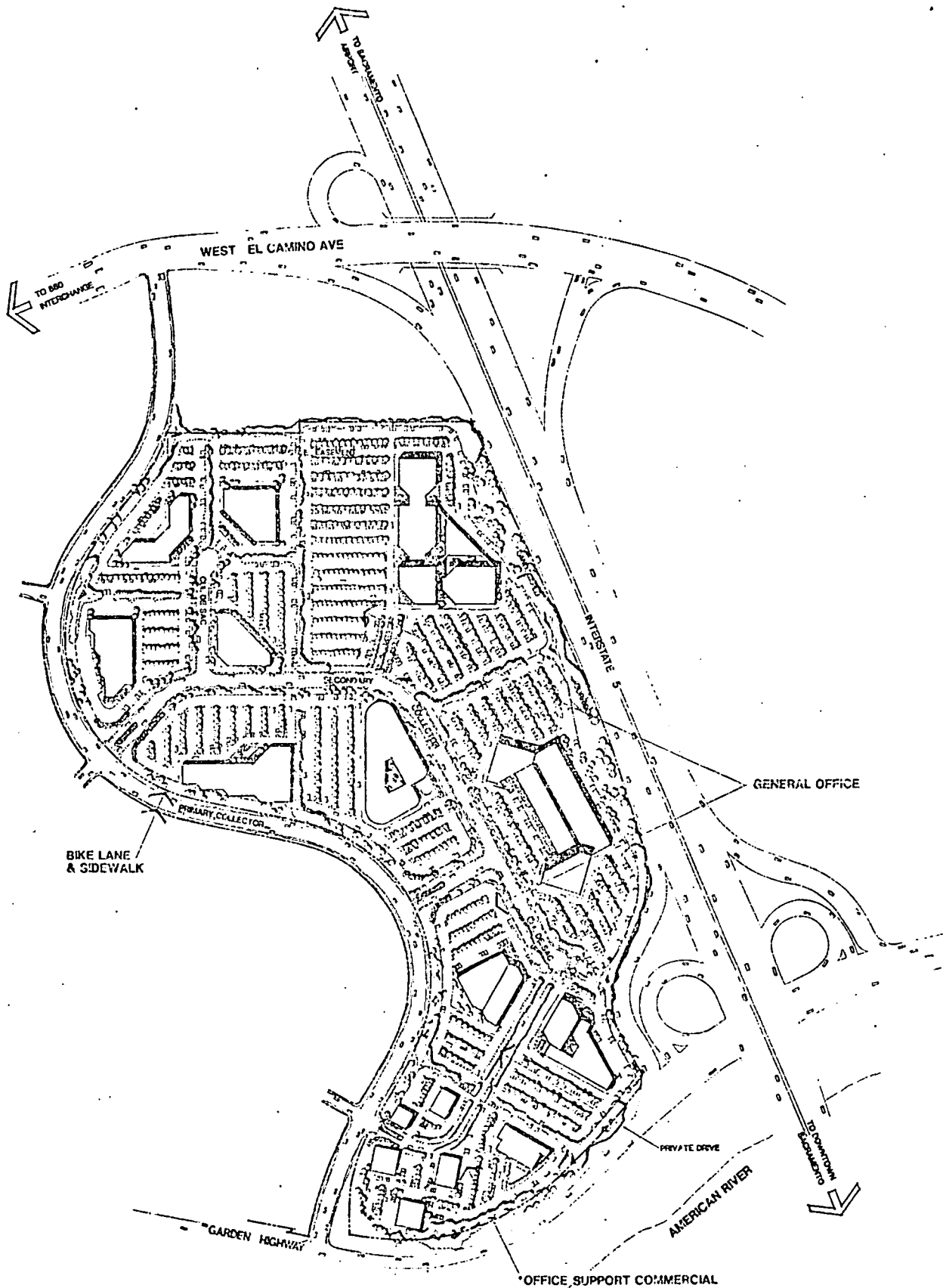
2. Certify that the EIR has been prepared in compliance with CEQA and that the City Planning Commission has considered the information contained in the Final EIR.
3. Determine that the project will have a significant effect on the environment, in that:
 - a. The project has the potential to degrade the quality of the environment because
 - i) the land uses will result in increased vehicular traffic resulting in less than acceptable levels of service on roadways and a deterioration of air quality due to increased auto emissions; and
 - ii) the project will be growth inducing by creating a demand for secondary commercial/office/distribution uses and by encouraging similar business park developments within the community plan area; and
 - iii) the project will reduce the total number of residential units in a community plan area where higher housing densities were designated to provide close-in housing to the region's major employment center, the Central City Core, and to reduce development pressure on urban reserve and permanent agricultural lands to the north of I-880.
 - b. The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals because:
 - i) the project provides additional employment opportunities while displacing planned residential units and increasing the demand for residential units;
 - ii) the project provides additional primary and secondary employment opportunities while increasing vehicular traffic congestion and deteriorating air quality;
 - iii) the project will provide additional employment opportunities but encourage similar business park development which will result in greater vehicle movements and greater deterioration of air quality.
 - c. The project has possible environmental effects which are individually limited but cumulatively considerable because:
 - i) the project will increase vehicle miles traveled and result in less than acceptable levels of service at two critical intersections. Combined with Natomas Eastside, three critical intersections will result in less than acceptable levels of service;

- ii) the project will displace residential units while creating demand for additional housing. Cumulatively, Gateway Centre and Natomas Eastside will displace approximately 1,800 units, eight percent of the residential holding capacity of the South Natomas community, while creating a demand for as many as 9,000 additional units, 39 percent of the dwellings called for in the South Natomas Community Plan.
 - d. The environmental effects of the project will cause substantial adverse effects on human beings, either directly or indirectly because:
 - i) the project will result in deteriorating air quality. Combined Gateway Centre and Natomas Eastside projects will result in a 130 percent increase in gross emissions over South Natomas Community Plan designated land uses for the project sites.
- 4. Recommend denial of the amendment to the 1974 General Plan from residential to commercial and offices.
 - 5. Recommend denial of the amendment to the 1978 South Natomas Community Plan from residential 9.7 av to business and professional offices and commercial-shopping center.
 - 6. Recommend denial of the amendment to the Natomas Oaks PUD from residential to business park development and to rename 90+ acres to Gateway Centre PUD because the proposed land uses are inconsistent with the 1978 South Natomas Community Plan.
 - 7. Denial of the request to initiate a rezone of 90+ acres from Light Density Multiple Family (E-3 PUD) and Townhouse (R-1A PUD to Office Building (OB-PUD) and General Commercial (C-2 PUD).

PROJECT VICINITY

SOUTH NATOMAS COMMUNITY PLAN AREA





TABULATIONS:

| | |
|---------------------|----------------|
| OFFICE | 1,450,000 S.F. |
| *SUPPORT COMMERCIAL | 75,000 S.F. |
| TOTAL | 1,525,000 S.F. |
| PARKING | |
| OFFICE | 5,800 CARS |
| SUPPORT COMMERCIAL | 500 CARS |
| TOTAL | 6300 CARS |

* DEVELOPER MAY OPT TO DISPOSE
 SOME OF SUPPORT COMMERCIAL
 TO OTHER AREAS OF PROPERTY

GATEWAY CENTRE

SACRAMENTO CALIFORNIA
 LEE C SAMMIS COMPANY

ILLUSTRATIVE



APPENDIX
LETTERS RECEIVED ON THE
EIR AND PROJECTS

NOV 12 1981

COUNTY OF SACRAMENTO
AIR POLLUTION CONTROL DISTRICT

RECEIVED



November 9, 1981

JOSEPH C. FOUST, M.D.
AIR POLLUTION CONTROL OFFICER
3701 Branch Center Road
Sacramento, California 95827
(916) 366-2107Mary Van Duyn, Director
Planning Department
City of Sacramento
927 10th Street
Sacramento, California 95814

Subject: COMMENTS: DRAFT DEIR, SOUTH NATOMAS BUSINESS PARKS

Dear Marty:

Staff and I have reviewed the subject document and find that air quality impacts that may result from the proposed projects are adequately addressed with exceptions as discussed below.

Toxic Emissions

Preparers of the DEIR assume that potential tenants of the proposed projects may be high technology industry and/or research and development firms. They also assume that emissions from any stationary source(s) locating within the proposed projects will be controlled via the District's permit process. Additionally, it is assumed that the net effect of such emissions will be insignificant after control. We concur with these assumptions with respect to emissions of criteria pollutants. However, such industries have the potential to emit toxic air contaminants, and the potential impacts of such emissions are not addressed in the DEIR.

Staff and I believe that such a discussion is relevant and necessary in view of our general lack of knowledge on this subject. This is especially important since the bulk of our stationary source control strategies are intended to control emissions of volatile organic compounds and may not be effective in controlling toxic emissions.

Emission Projections

Emission projections contained in the subject DEIR do not include the following estimate which may be significant.

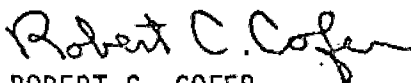
1. Potential emissions of toxic air contaminants.
2. Projections of motor vehicle emissions generated from: a.) Increased commercial traffic servicing the project area, b.) Increased traffic from individuals doing business in the project area, and 3.) Tenants who may operate motor vehicle fleets and doing business in this area.

Mitigation Measures

Measures discussed in the DEIR to mitigate adverse air quality impacts need to be expanded and added to in order to fully mitigate the potential adverse air quality impacts. Responsible agencies should be fully identified and an implementation plan for mitigation should be proposed.

We thank you for the opportunity to comment on the subject DEIR. If you should have any questions regarding our comments, please contact Gary Glissmeyer or myself at 366-2107.

Very truly yours,



ROBERT C. COFER
Deputy Air Pollution Control Officer

RCC:GG:lm

cc: Air Resources Board, Regional Programs Division
Sacramento Area Council of Governments, Gary Stonehouse
Sacramento County Planning Department
Sacramento County Environmental Impact Section

AIR RESOURCES BOARD

1102 Q STREET
P.O. BOX 2815
SACRAMENTO, CA 95812

CITY PLANNING COMMISSION



NOV 23 1981

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November 19, 1981

Mr. Cliff Carstens, Senior Planner
City of Sacramento
927 - 10th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Carstens:

SUBJECT: Final Environmental Impact Report on South Natomas
Business Park, SCH. No. 81090406

On September 24, 1981, we commented on the Draft EIR for the South Natomas Business Park. We have now reviewed the Final EIR (FEIR) and find that concerns expressed in our September 24 letter have not been satisfied. Specifically, the document still lacks discussion of; the project's impact on the 8-hour carbon monoxide (CO) standard; identification of the entity(ies) responsible for implementing the mitigation measures with a schedule for implementation, and a discussion of the projects inconsistency with the regional air quality plan.

As stated in our September 24 letter, the following issues still need to be addressed:

1. An air quality analysis of the project's impact on the 8-hour carbon monoxide standard of 9 ppm.
2. Mitigation measures should be included which offset the projected air quality impacts from the project. The FEIR assumes that the road improvements on West El Camino Avenue are part of the project proposal. However, this improvement of the road system should be addressed as a mitigation measure to alleviate traffic congestion. The FEIR should identify the agency responsible for funding and implementing these roadway improvements, as well as other mitigation measures proposed to offset air quality impacts resulting from the project.
3. The issue of project consistency with the Regional Air Quality Plan was addressed in the FEIR Addendum, page 31, with the following response: "According to SACOG, this increase would prevent Sacramento area's attainment goal for 1987. Therefore in this sense, the South Natomas Business Park would not be inconsistent with the Air Quality Plan." The logic of this statement is not clear. If the project increases emissions above those projected in the Air Quality Plan, then mitigation measures should be adopted to offset these increases.

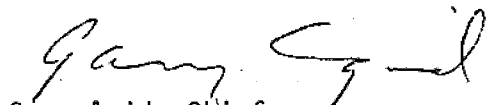
November 19, 1981

In a recent Appellate Court decision, Cleary v. County of Stanislaus, clarification of the requirements for responding to review comments was made. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted. Responses to comments must not be conclusory statements, but must be supported by empirical or experimental data, scientific authority or explanatory information.

We do not feel that all of the comments raised in our September 24, 1981 letter on the DEIR have been adequately addressed in this document. Until the issues raised in this letter are adequately addressed, we do not feel the environmental review process has been adequately addressed and a decision on the project should be delayed.

If you have any questions, please contact Sue Scott or Michael Redemer, of my staff, at 322-3806.

Sincerely,



Gary Agid, Chief
Local Project Support Branch
Regional Programs Division

cc: B. Cofer, Sacramento APCD
G. Stonehouse, SACOG

MCDONOUGH, HOLLAND & ALLEN

A PROFESSIONAL CORPORATION
ATTORNEYS

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(916) 444-3900

FELIX S. WAHRHAFTIG
(1908-1969)

NEWPORT BEACH OFFICE
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NEWPORT BEACH, CALIFORNIA 92660
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IN REPLY REFER TO:

CITY PLANNING COMMISSION

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December 8, 1981

MARTIN MCDONOUGH
ALFRED E. HOLLAND
BRUCE F. ALLEN
V. BARLOW GOFF
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DAVID J. SPOTTISWOOD
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RICHARD E. BRANDT
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G. RICHARD BROWN
DENNIS D. O'NEIL
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D. WILLIAM DENTINO
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DAWN H. COLE
JOHN M. TAYLOR
ARCHIE T. WRIGHT, III
JANET NEELEY-KVARME
DENNIS W. DE GUIR

Mr. Clif Carstens
Senior Planner
City Planning Department
927 - 10th Street, Suite 300
Sacramento, CA 95814

Re: Natomas Eastside: Further Comments on the
Project EIR

Dear Clif:

On behalf of the applicant for Natomas Eastside, I am submitting the following comments on the traffic impacts identified in the South Natomas Business Park's EIR relating to four critical intersections. These comments are the result of a comparison of the traffic data and analysis in the draft EIR with the additional data and analysis provided by CH2M Hill and the JHK Traffic Study. This comparison shows that the traffic impacts associated with Natomas Eastside alone are not nearly of the magnitude indicated in the draft EIR. In addition, the comments address the traffic data and analysis in general terms and suggest how this data and analysis should be used to evaluate the project.

Critical Intersections

The draft EIR identifies the following four critical intersections and the peak hour times when they are problems:

1. Natomas Oaks Drive - Garden Highway (PM level only)

Mr. Clif Carstens
December 8, 1981
Page 2.

2. I-5 South Bound Off-Ramp/Garden Highway (AM and PM levels)

3. Natomas Oaks Drive/West El Camino (AM and PM levels)

4. I-5 North Bound Off-Ramp/West El Camino (AM level only).

1. Natomas Oaks Drive-Garden Highway (PM level only). The draft EIR states that this intersection will have an "F(PM)" service level if both the Natomas Eastside and Gateway projects are constructed. The CH2M Hill combined and project-by-project figures for this intersection, however, show the following:

| | Level of Service | |
|---------------|------------------|-----------|
| | <u>AM</u> | <u>PM</u> |
| | % | % |
| Both Projects | A (49) | F(104) |
| Eastside only | A (46) | A (55) |
| Gateway only | A (45) | E (94) |

According to the project-by-project figures provided by CH2M Hill, the service level at this intersection will be an "A" level if only Natomas Eastside is built. It must be concluded, therefore, that the traffic impact at this intersection is not attributable to Natomas Eastside, but stems almost solely from the Gateway project.

2. I-5 South Bound Off-Ramp/Garden Highway (AM and PM levels). The draft EIR indicates a service level of "F" at this intersection for both AM and PM peak hours if both projects are built. The following CH2M Hill project-by-project figures show these levels reduced to "E" if only the Natomas Eastside project is built:

| | Level of Service | |
|---------------|------------------|-----------|
| | <u>AM</u> | <u>PM</u> |
| | % | % |
| Both Projects | F(126) | F(122) |
| Eastside only | E (99) | E (93) |
| Gateway only | E (99) | F(108) |

The JHK Traffic Study, however, soundly shows that the draft EIR data for this intersection and, accordingly, the

Mr. Clif Carstens
December 8, 1981
Page 3

CH2M Hill project figures which are extrapolations of the draft EIR data, are inaccurate. The inaccuracy stems from two things: the failure by the preparers of the draft EIR to recognize a second entry and exit point to the Natomas Eastside project and an overestimation of the amount of traffic traveling to the site from the North. The following analysis is drawn from the JHK Traffic Study:

The only southbound exit point from I-5 after passing I-880 is at Garden Highway, and there is no northbound entry point to I-5 before I-880 after Garden Highway. The draft EIR and the CH2M Hill studies assume that all I-5 southbound entry traffic to and northbound exit traffic from the two projects and the proposed residences in the area will use the Garden Highway exchange. I-5, however, is not the only logical entry and exit point to Natomas Eastside. Equally convenient entry also exist from I-880 to West El Camino; that is, it is both possible and convenient to exit from I-880 and approach Natomas Eastside from the west along West El Camino while reversing this procedure to exit. The use of this intersection by commuters and other people becomes even more likely when one evaluates the area at full build-out, as the studies assume. When the area west of the canal and surrounding the intersection is developed, this intersection will be as logical a point of entry and exit as the I-5 - Garden Highway route. CH2M Hill did not give sufficient attention to this possibility of entry and exit from Natomas Eastside via I-880. The JHK study recognizes this possibility.

In addition, JHK determined the projections made in the draft EIR of the number of trips oriented towards downtown Sacramento and South Sacramento were greatly overstated. By using directional distribution for home based, commercial, and office trips, rather than a single distribution which was used in the draft EIR, JHK found the actual number of trips to be twenty to twenty-five percent less than that projected in the draft EIR.

Recognition of the I-880 entry and exit to Natomas Eastside and use of the more accurate projection of the number of trips oriented south towards downtown Sacramento and South Sacramento result in a significant lowering of the levels for the Garden Highway - I-5 off-ramp. The reduced levels reported by JHK are as follows:

Mr. Clif Carstens
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| | Level of Service | |
|---------------|------------------|-----------|
| | <u>AM</u> | <u>PM</u> |
| | VTD | VTD |
| Both Projects | C(1091) | D(1211) |
| Eastside only | C(1157) | B(1026) |
| Gateway only | B (915) | D(1211) |

This chart shows that the worst service level is achieved ("D") if both projects are built or if the Gateway project only is built. Natomas Eastside will produce, at worse, a "C" service level.

The JHK traffic study more accurately defines the desired path in terms of minimum travel time. As the JHK consultant stated, "I am confident that our approach has more precisely defined the travel patterns in the South Natomas area." As such, it must be concluded that the Natomas Eastside project does not result in a significant traffic impact at this intersection.

3. Natomas Oaks Drive/West El Camino (AM and PM levels). According to the draft EIR figures shown below, this intersection will operate at an "F(AM and PM)" level whether both projects are constructed or just Natomas Eastside is built.

| | Level of Service | |
|---------------|------------------|-----------|
| | <u>AM</u> | <u>PM</u> |
| | % | % |
| Both Projects | F(119) | F(142) |
| Eastside only | F(114) | F(141) |
| Gateway only | D (85) | E (90) |

Again, however, the JHK study shows that the problem is not of the magnitude portrayed by CH2M Hill.

The CH2M Hill study assumes that West El Camino Avenue will have four lanes plus bike lanes and some turnout facilities; the JHK study assumes that West El Camino Avenue will be constructed to a six lane divided cross-section. Although the present South Natomas Community Plan designates West El Camino as a four lane street, this assumption is based on what will be needed if the area is developed consistently with the present plan. In addition, the JHK assumption that some of the Natomas Eastside traffic will travel west on West El Camino Avenue to I-880 discussed under section 2 above also affects the level of

service here. These JHK study assumptions result in significantly lower service levels for the Natomas Eastside project, as set forth below:

| | Level of Service | |
|---------------|------------------|-----------|
| | <u>AM</u> | <u>PM</u> |
| | VTD | VTD |
| Both Projects | D(1242) | E(1424) |
| Eastside only | B (945) | D(1205) |
| Gateway only | D(1227) | D(1247) |

As these figures indicate, a "D(AM)" level of service and an "E(PM)" level will result if both projects are constructed. If just Natomas Eastside is constructed, the levels will be "B(AM)" and "D(PM)", less than the figures attributable to Gateway. The "D(PM)" level, however, is marginal: the "C" service level ends at 1199 and the "D" Service level ranges from 1200 to 1350; the numerical value upon which the "D" level was assigned is just 1205.

4. I-5 North Bound Off-Ramp/West El Camino (AM level only). While the draft EIR and the CH2M Hill additional data find the PM levels at this intersection to be acceptable, they conclude that the AM levels would be unacceptable if both projects were constructed or if just Natomas Eastside were built. The unacceptable traffic levels are attributed to Natomas Eastside due to the assumption that this off-ramp will most likely be used primarily by those traveling north on I-5 seeking access to Natomas Eastside; people wishing access to the Gateway project will have already turned off at the Garden Highway exit.

The JHK Traffic Study, however, shows that this intersection will operate at the "D(AM)" service level if only the Natomas Eastside project is built, with the actual numerical value being less than the Gateway project. This is due to a finding by JHK that significantly more traffic going to Gateway will be using this offramp than CH2M Hill determined. This finding is based on a more accurate and detailed zone system for determining traffic routes for the project areas. The actual numerical value attributable to Natomas Eastside is 1239, clearly within the lower end of the "D" service level.

The two sets of figures for this intersection are as follows:

Mr. Cliff Carstens
December 8, 1981
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JHK

| | Level of Service | |
|---------------|------------------|-----------|
| | <u>AM</u> | <u>PM</u> |
| | VTD | VTD |
| Both Projects | E(1469) | C(1090) |
| Eastside only | D(1239) | C(1086) |
| Gateway only | D(1298) | C(1076) |

CH2M HILL

| | % | |
|---------------|--------|--------|
| | | |
| Both Projects | F(115) | B (73) |
| Eastside only | E (90) | B (62) |
| Gateway only | C (67) | B (62) |

Utilization of Traffic Impact Analysis

To properly utilize the traffic impact data set forth in the EIR in the environmental analysis of the project, two things must be recognized. First, the levels of service assigned to each of the critical intersections have a sizable degree of uncertainty due to the indefiniteness of the base data with which the service levels were determined. As you know, neither you nor the applicant has been able to determine the origin of this data or the method by which it was calculated. As such, the environmental analysis should not focus on the specific numbers, but rather should use the numbers as a general gauge of the service level range within which the project may fall. Secondly, and possibly more importantly, it must be recognized that the data in the EIR and in the subsequent analyses are based on conditions projected to exist at full build-out of the entire South Natomas area, both east and west of I-5. These conditions, of course, will not exist when Natomas Eastside, if approved, is completed, and possibly will never exist. As such, the figures given represent the absolute worst case situation.

It should also be noted that the JHK study analyzed the worst case situation for these intersections if the South Natomas area were to be developed to the maximum residential densities permitted under the existing plan. The result was that each of the intersections would operate at the "E" or "F" level in the a.m. and p.m. peak periods. This is significant in assessing the impacts of Natomas Eastside as compared with the impacts associated with the

Mr. Clif Carstens
December 8, 1981
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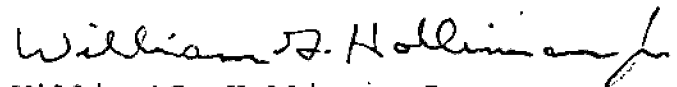
present plan. This also gives greater significance to the fact that the Natomas Eastside project produces service levels at the Natomas Oaks Drive/West El Camino intersection and the I-5 North Bound Off-Ramp/ West El Camino intersection which are only barely within the "D" service level.

Conclusion

Consideration of the data supplied by CH2M Hill, which breaks the traffic impact figures down project-by-project, and the JHK Traffic Study are essential to the environmental analysis of the project. To be fairly and accurately analyzed, each project must be assessed separately. In addition, the JHK study identifies erroneous assumptions underlying the CH2M Hill figures relating to certain intersections. When this additional data is considered, it is clear that the magnitude of the traffic impact identified in the draft EIR is overstated, and the traffic impact attributable to Natomas Eastside alone is considerably less than the total. In addition, these results must be read in light of the indefiniteness of the base data upon which they were determined and the fact that the data is based on the projected full build-out of the South Natomas area.

Thank you for the opportunity to submit additional comments on the environmental analysis of Natomas Eastside. I trust you will find these comments to be of value.

Very truly yours,


William G. Holliman, Jr.

WGH:js

cc: Donald Horel
Enlow Ose

SACRAMENTO AREA COUNCIL OF GOVERNMENTS
AIRPORT LAND USE COMMISSION
FOR THE COUNTIES OF SACRAMENTO, SUTTER, YOLO, YUBA

PUBLIC AGENCY REQUEST FOR STAFF COMMENT

| | | |
|------------|---|----------------------|
| Control #: | Affected Airport(s): Natomas Airpark | ALUC Review #: 81-29 |
|------------|---|----------------------|

| | | |
|---------------------------------|---|--|
| Application for: | | |
| <input type="checkbox"/> REZONE | <input type="checkbox"/> TENTATIVE SUBDIVISION/PARCEL MAP | <input checked="" type="checkbox"/> OTHER Draft EIR |

| | | |
|-------------------------------------|----------------|-------------------------|
| Requested by: City of Sacramento | Date Received: | Date Comment Requested: |
|-------------------------------------|----------------|-------------------------|

Applicant to Public Agency: Natomas Eastside Project: 885 Investment Co. and Gateway

Centre Project: Lee Samis Co. Sacramento, CA

Address

Telephone

Location of Property (reference to airport):

Southwest of Natomas Airpark. Northern portion of Natomas Eastside located within Safety Area 3 (General), all within Airport Height Restriction Area.

Description of Proposed Development:

Combined projects: 181 acres of office (3.35 million sq. ft.), 31 acres of commercial (307,500 sq. ft.), 21 acres of residential (468 units), and a 1.5 acre fire station; 270 acres gross land area.

Applicable ALUC Policy:

☒ HEIGHT

☒ SAFETY

☐ NOISE

ALUC Staff Comments: The two projects are located within the Natomas Airpark "Airport Area of Influence" as designated by the Airport Land Use Commission (ALUC). The adopted ALUC Policy Plan (June 1975) restricts the development of new non-compatible land uses within airport height restriction areas and further defines non-compatible land uses as follows:

"Any use which would penetrate a height restriction plane established by Federal Aviation Regulations Part 77. Any use which would raise the weather minimums for an existing or planned instrument approach."

Although the proposed project would appear to be consistent with this policy, the Final EIR should contain confirmation from FAA that height restriction planes will not be penetrated.

In addition, the northern portion of the Natomas Eastside Project is located within Safety Area 3, which generally coincides with that overflowed by local traffic patterns. Within airport Safety Area 3, the ALUC Policy Plan identifies the following as non-compatible land uses:

"Depending on location, any use which would result in large concentrations of people such as stadiums, hospitals or schools. The ALUC further recommends that member jurisdictions develop local review procedures for considering developments within this safety area."

Large concentrations of people is further defined (p. 32 Policy Plan) 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."

(continued on next page)

Reviewed By: Jan Bunch *[Signature]*

Date: 12/10/81

13

Natomas Airpark (Continued):

It is recommended that the Final EIR identify the location of the project with respect to the airport and estimate concentrations of people expected to be present in the proposed office uses located within Safety Area 3.

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34 Timberwood Court
Sacramento, California 95833

November 25, 1981

Cliff Carstens, Senior Planner
City Planning Department
City of Sacramento
927 Tenth Street, Suite 300
Sacramento, California 95814

RE: Final EIR for South Natomas Business Park Proposals

Dear Mr. Carstens:

I write to request a staff recommendation that the Planning Commission postpone certification of the EIR for the following reasons:

1. First, inadequate responses were made to many comments made in response to the draft EIR. The appellate court reversed the decision in Cleary v. County of Stanislaus, citing Public Resources Code §15146(b) which states that responses may not be nonspecific and general in nature and must constitute a good faith, reasoned analysis.

2. The EIR only addresses the immediate impacts of the proposed projects and fails to analyze and report the second and third order impacts, thereby significantly understating the true impacts of the projects.

3. Another similar project is proposed directly east of I-5. This additional project and other deviations from the South Natomas Community Plan should be incorporated into a single EIR.

4. The City is undertaking an Accelerated General Plan Revision. This should be completed before the EIR is certified.

These reasons are explained in more detail below:

1. Inadequate Response to Comments:

I have based my first reason for postponing certification primarily upon the response to my testimony at the October 1, 1981 public hearing. Three of my comments are summarized on Final EIR Addendum, page AB1. The EIR only responded to one

Cliff Carstens, Senior Planner
November 25, 1981
Page Two

of these and the response was not to the concern I posed. I made other comments which I thought were clear and were not meant to be rhetorical in nature. These were not reported in the Addendum nor did they receive responses.

My question regarding how the housing impacts of the projects will be accommodated did not receive an adequate response. I asked not only where the 1800 directly displaced dwelling units will go, but also the up to 9000 new units which will be required as a result of the projects and the additional units displaced by nonresidential development induced by the projects. It is likely that the project will result in a net housing demand impact (increased demand plus reduction in planned capacity) of 15,000 units when neighborhood commercial uses displaced by the projects and office commercial uses ancillary to the projects locate in South Natoma and displace additional housing units. It is clear from the EIR that the proposed uses will not be neighborhood oriented as designated in the community plan. The EIR also states the projects will increase demand for additional commercial uses.

My question regarding the use of the secondary job multiplier in the traffic assessment was not "whether," but "why not." It is clear that no traffic resulting from secondary employment is factored into the traffic assessment. Since secondary employment may cause as much traffic as primary employment, it should be included in the EIR.

I also made other comments about the economic base multipliers used in the EIR. No basis was given for selection of these numbers (1.5 to 2.0). I pointed out the fact that they are significantly lower than the multiplier used in the growth concepts issue paper (2.95) which was discussed by the Planning Commission earlier the same evening. I also reported that the U.S. Bureau of Economic Analysis has published some fifty input-output based multipliers for specific industries in the Sacramento region. The selection of an economic base multiplier should be justified when questioned.

In addition, I commented that morning traffic exiting southbound I-5 at Garden Highway will impede traffic entering

Cliff Carstens, Senior Planner
November 25, 1981
Page Three

I-5 at El Camino. This same problem was identified in the August 25, 1981 correspondence from E. F. Galligan of Cal Trans. This impact has not been addressed in the EIR despite the response made on page 18 which states the contrary.

I made other comments centered around the failure of the EIR to adequately address the cumulative impacts of the proposed projects and emphasized that the EIR must address these. My comments in this area were not reported nor did they receive a response.

2. Cumulative Impacts

The impacts which a community must live with when major development occurs are not limited to the direct impacts of that development, but the cumulative impacts resulting from the interaction of primary impacts upon each other and with the environment. The proposed projects will be located in a dynamic system, one which is constantly changing, responding to change and changing further.

To report that a project will have the following direct impacts is one thing; how the system ultimately is changed is often another significantly different matter. Economic base multipliers provide a well-known example of a projection technique which is dynamic in nature. Each job added to an economy will cause a greater number of jobs to be created. Jobs will be created in firms which supply or purchase from the firm which creates the new job. The new employee will purchase goods and services in the economy and support additional employment. The indirect employees will create additional (induced) employment as a result of the goods and services they and their firms purchase or supply in the economy.

Employment multipliers show how outputs in a single area can create a positive feedback system in that single area. The same is true for the variety of areas in a complex urban environment.

Impacts in one area will cause additional impacts in other areas. While, for example, indirect and induced employment are the impacts of a project, they are also the cause of housing demand. Housing demand is also the cause of

Cliff Carstens, Senior Planner
November 25, 1981
Page Four

employment while units are built. The interaction of impacts with each other can be traced through the system. For example, the project provides direct employment which results in indirect and induced employment which creates housing demand which increases traffic which increases circulation system construction and maintenance costs, ad infinitum.

There are both practical and statistical limits to this kind of analysis. Information becomes increasingly more costly and less significant as one proceeds. The analysis for the proposed projects has not approached those limits. The cumulative or interactive impacts in the areas of traffic, housing, land use, public services and growth inducement must be addressed in greater detail due to the magnitude of the proposed projects and the fact that they represent a fundamental shift in plans for the South Natomas area.

3. Comprehensive EIR

While it was commendable that the EIR combined the two projects proposed west of I-5, the Creekside project proposed east of I-5 should be combined with these projects in a comprehensive EIR for the South Natomas community. An EIR of this nature will be necessary before the general plan and community plan can be amended to accommodate these projects. It will be necessary, for example, to address community-wide traffic impacts rather than simply the six intersections adjacent to the projects. The question of where South Natomas residents will buy their milk and bread needs to be addressed and the impact of alternative locations for neighborhood commercial and office facilities displaced by regional office commercial must be analyzed. The impacts of increased residential densities and infrastructure capacities must also be analyzed. A single comprehensive EIR rather than a number of separate documents is the only way to adequately assess the impacts of regional office construction on South Natomas.

4. Growth Policies

The City is currently undergoing a fairly rigorous analysis which will lead to policies and programs for managing future growth. This analysis is directly related to the proposed projects since they represent a significant percentage of currently projected growth and also constitute a

Cliff Carstens, Senior Planner
November 25, 1981
Page Five

fundamental policy shift. It would be imprudent to certify an EIR for projects of this magnitude without the benefit of the projections and policies which will result from this analysis. The impacts of the proposed projects may vary significantly based on new information and new policies.

I sincerely hope that the decision makers in this community will be able to properly manage the growth of the region. Sacramento is blessed with a quality of life which surpasses the balance of the urbanized state. In comparison, the weather is good, the air is clean, housing is affordable, traffic and congestion are mild and opportunities for growth abound. These qualities make Sacramento very attractive to individuals who desire a better life; unfortunately, they also provide the seeds for the destruction of the region. We must be careful and thorough, lest Sacramento become another San Jose or Los Angeles.

Sincerely,



GERALD L. RIOUX

GLR:clr

cc: Sacramento Planning Commission
David Shore



CITY OF SACRAMENTO

CITY PLANNING COMMISSION

DEC 2 - 1981

RECEIVED

DEPARTMENT OF POLICE

HALL OF JUSTICE
813 - 6TH STREET

SACRAMENTO, CALIFORNIA 95814
TELEPHONE (916) 448-6121

JOHN P. KEARNS
CHIEF OF POLICE

November 18, 1981

CR 11-53

MEMORANDUM

To: Cliff Carstens, Senior Planner
Sacramento City Planning Department
927 10th Street, Suite 300

FROM: Jim Barclay, Officer
Community Resources Section
Sacramento Police Department

SUBJECT: FINAL EIR FOR SOUTH NATOMAS BUSINESS PARK PROPOSALS

We have reviewed the above document and our only comments refer to those portions of pages C-2 and C-9 which deal with public service needs. Comments on those pages imply that the project will have little if no effect on demands for police services. While it is true that a business park development will result in a lower increase on demands for police service than a residential development, there will nevertheless be a significant increase over the present demand.

The project is located in a patrol district which is already understaffed. We anticipate the addition of one more patrol unit in the area; however, this will not be sufficient to adequately handle increased calls for service, which can be expected to begin with the start of construction on the project.

Fred Arthur, Lieutenant
Community Resources Section

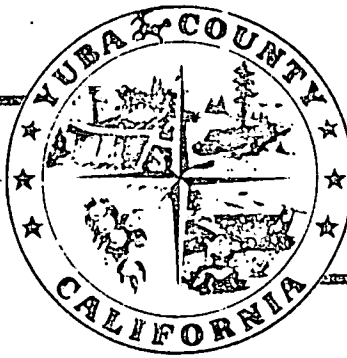
J. A. Barclay
J. A. Barclay, Officer
Crime Prevention Unit

FA:JAB:imw

EARNIE E. VICKREY

Assistant

D. B. (Bernie) ENGLE



DEPARTMENT OF AGRICULTURE
CITY PLANNING COMMISSION

AIR POLLUTION CONTROL

NOV 25 1981

RECEIVED

(916) 674-6484

938 14th Street
Marysville, CA 95901

November 24, 1981

City of Sacramento
City Planning Department
927 Tenth Street - Suite 300
Sacramento, CA. 95814

SUBJECT: COMMENTS ON THE MERITS OF THE SOUTH NATOMAS BUSINESS
PARKS PROPOSAL.

Gentlemen:

The Yuba County Agricultural Commissioner/Air Pollution Control Office has recently received copies of the South Natomas Business Parks Draft EIR and the South Natomas Business Parks Addendum: Final Environmental Impact Report.

After a brief review of these reports several questions have been raised which are of concern to this Office. Due to the dual nature of our activities, the concerns of this Office fall into two categories: the encroachment of developments into agricultural areas and the addition of air pollutants into regions where air quality is presently poorer than the National Air Quality Standards. While common sense forces us to realize that comments from this Office will have essentially no impact upon the proposed development, a deeper compulsion to protect the environment and the World's most essential industry - Agriculture - drives our conscience to ask these few brief questions.

These first questions deal with concerns of the proposal's effect upon agriculture.

1. Why has a development of this type even been proposed which would permanently remove utilization of any amount of this excellent agricultural soil?

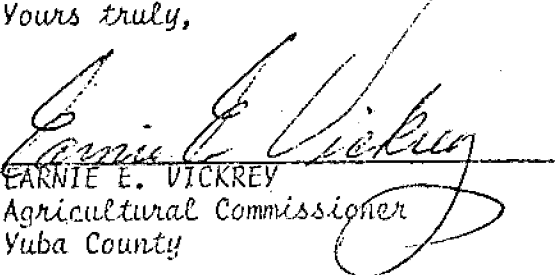
City of Sacramento
City Planning Department
November 24, 1981
Page Two of Two.

2. If land use planning is truly what it is supposed to be, then the land would be utilized to its best capacity. Are there not other sites for business developments, such as the foothills, which would not waste prime agricultural lands?

How many people could be fed each year from that land if left as farm land? (50 + people/acre times 180 acres). (9,000 +) (Which nine thousand + of the planners and their families volunteer not to eat forever in order for the development to be constructed at this site?)

If you don't draw the line here, where will it ever stop???

Yours truly,


EARNIE E. VICKREY
Agricultural Commissioner
Yuba County

EEV/DMB/mbw

December 16, 1981

City Planning Commission
Sacramento, California

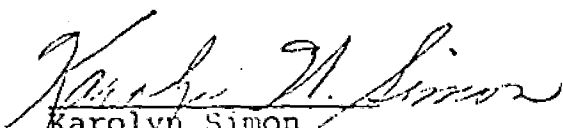
SUBJECT: Proposals for Office Park Development within South Natomas

Members in Session:

The Central City Plan Citizen's Advisory Committee during three recent meetings discussed the potential impact of the proposed office park developments within South Natomas on the future viability of the Central City. The primary goal of the Central City Plan is to ensure continued revitalization of residential, commercial, office, and cultural elements of the community. The Committee is primarily concerned that development of major office parks immediately adjacent to the Central City, which provide free parking and other amenities, will impair the marketability of existing and projected levels of office space within the Central City.

The Committee is also concerned that displacement of about 2700 residential units within the South Natomas Community coupled with an increased demand for housing as a result of the jobs generated by the business parks will result in an increased demand for and price of housing in the Central City. Since the South Natomas area was originally designed as the bedroom community for the Central City, the future residents unable to locate within South Natomas will be forced to travel a greater distance to their work destination with a reduced opportunity to utilize alternative transportation methods, thereby contributing to the existing problem of traffic congestion within the Central City. In addition, displacement of residential units will reduce the demand for Central City retail/commercial goods and services.

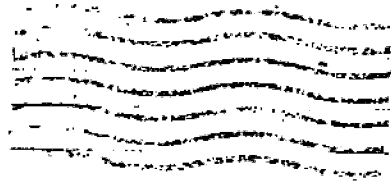
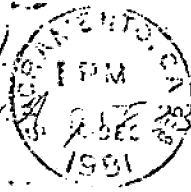
As a result of the above concerns, the Central City Plan Citizen's Advisory Committee passed a motion "To oppose approval of the three office park developments proposals within the South Natomas Community because of their impact on the integrity of the South Natomas Community Plan, the impact on office development within the Central City, and the impact on the integrity of the Central City Plan" on a vote of 9 ayes, 1 no and 1 absent at their December 7th meeting.


Karolyn Simon
Chairperson

KS:SP:10

W. Stephens
927-10th St.
Sacramento, CA

CITY PLANNING COMMISSION
DEC 9 1981
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100% POSTAGE

City Planning Commission
927-10TH
Suite 300
Sacramento, CA

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12-14-81

Gentlemen: This is to express opposition
to the 2 business parks west of I-5
between Garden Hwy. & I-550.

I'm a resident of the area and use
West El Camino & Garden Hwy. routinely.
The current level of traffic is
already a problem at that point.
Recent growth has been very heavy.
The whole character of the land
where I purchased 2 years ago has
changed. The pressure these projects
would place is not in any sense helpful to
the area, the city, the state.



530 BERCUT DRIVE, SUITE 207, SACRAMENTO, CA 95814 (916) 448-1261

P-91147-1243
CITY PLANNING COMMISSION

DEC - 3 1981

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December 4, 1981

Sacramento City Planning Commission
City Hall
915 "I" Street
Sacramento, CA 95814

RE: Proposed Gateway Centre, South Natomas

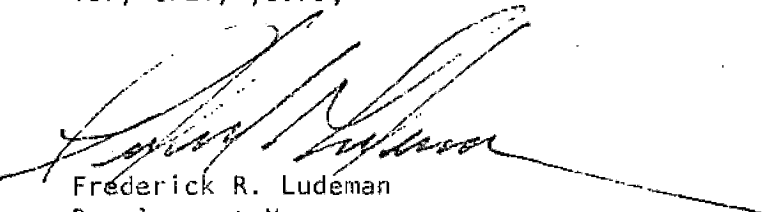
Ladies and Gentlemen:

On December 10th, you will be hearing a rezoning request by the Lee Sammis Company pertaining to their proposed Gateway Centre development in South Natomas.

As a major residential developer in the South Natomas area, Citation Homes strongly endorses the proposed Gateway Centre development. This development will provide desirable employment opportunities at an appropriate location with direct access to Interstate 5 and within immediate proximity of established and expanding residential areas.

We submit that Gateway Centre is a well conceived and desirable development which will provide the City the opportunity to further promote a diversified employment base in the Sacramento area and we respectfully request your approval of this rezoning application.

Very truly yours,



Frederick R. Ludeman
Development Manager
Sacramento

FRL/jee

cc: Lee Sammis Company
ATTN: K. Mark Nelson

ADDENDUM:
FINAL ENVIRONMENTAL IMPACT REPORT
**SOUTH NATOMAS
BUSINESS PARKS
PROPOSALS**
SACRAMENTO, CALIFORNIA

Prepared for the
CITY OF SACRAMENTO

by

WAGSTAFF AND BRADY
Urban and Environmental Planners

with the Assistance of

CH2M HILL, Environmental and Traffic Engineering
LE BLANC & COMPANY, Urban Economics

November 1981



CITY OF SACRAMENTO

CITY PLANNING DEPARTMENT

927 TENTH STREET
SUITE 300

SACRAMENTO, CA 95814
TELEPHONE (916) 449-5604

MARTY VAN DUYN
PLANNING DIRECTOR

November 11, 1981

TO: INTERESTED PERSONS

SUBJECT: FINAL EIR FOR SOUTH NATOMAS BUSINESS PARK PROPOSALS

The City Planning Department is forwarding this document for a 14-day review period to persons who commented on the Draft EIR as indicated on the enclosed Final EIR distribution list. Commentors 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. The comments have been paraphrased from the commentors' letters and from oral comments. Copies of the commentors' letters and oral comments submitted in written form are included in Appendix A of this addendum. Comments and responses are grouped herein by topic in the same order found in the Draft EIR.

Comments on the Final EIR and/or the merits of the projects should be received by the Planning Department no later than November 25, 1981, to be considered by the staff.

The Sacramento City Planning Commission will consider the Final EIR and the projects at their regular meeting on December 10, 1981, starting at 5:15 p.m. in the Council Chambers of City Hall; 915 I Street; Sacramento, California.

A copy of this document has been forwarded for public review to the following libraries: Carmichael, Central, Del Paso, Hagginwood, King, McClatchy, McKinley, and the CSUS Science/Tech Library. In addition, a copy may be reviewed or obtained at the City Planning Department.

Please contact Diana Parker at 449-5381 or me at 449-5604 if you have any questions regarding this matter.

Cordially,

Clif Carstens
Senior Planner

CC:mlo
encl

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I. INTRODUCTION

This Final EIR has been prepared in the form of an attachment or addendum to the Draft EIR (DEIR). This addendum consists of:

- a. Incorporation of the DEIR by this reference.
- b. A list of persons, organizations, and public agencies to which the Final EIR has been referred for comment.
- c. A list of persons, organizations, and public agencies commenting on the DEIR within the required 30-day review period.
- d. Comments and recommendations received on the DEIR, including those received in written form and at public hearing.
- e. The responses of the city (the lead agency) to significant environmental points raised in the DEIR review process.

Major comments herein relate to project relationships to established land use policies, and to project impacts on traffic, the I-5 gateway effect, population and housing, the central business district, and air quality. Other comments responded to herein concern DEIR content with regard to project effects on the quality of life in the South Natomas community, effects on local neighborhood commercial and office uses, the availability of designated office lands elsewhere to accommodate the project, the area's market demand for office space, project growth-inducement effects, effects on bicycle use, and consideration of alternatives to the project.



II. DISTRIBUTION LIST FOR THE FINAL EIR

Sacramento City Council
Sacramento City Planning Commission
City Manager, Walter J. Slipe
City Engineer, Ron Parker
City Attorney, James P. Jackson
City Traffic Engineer, Les Frink
City Department of Community Services, G. Erling Linggi
City Department of Finance, Ken Nishimoto
Office of Planning and Research, Stephen V. Williamson
Arby Sue Scott
CalTrans; E. F. Galligan
CalTrans; R. D. Skidmore
Department of Fish and Game, D. T. Jensen
Reclamation Board, Ted Allen
Native American Heritage Commission, Benjamin Delany
SACOG; Gary L. Stonehouse
Regional Transit, Gene Moir
PG&E, K. J. Lamb
SMUD, David Oto
Capitol Bicycle Commuters Assn., Jim Baetge
ECOS, Tina Thomas
League of Women Voters of Sacramento, Lois Woodruff
Morrison Homes, Herman J. Tijsseling, Jr.
John Diepenbrock
Greg Rodgers, Lee Sammis Co.
JHK & Associates, Charles M. Adrams
Coldwell Banker, Thomas C. Aguer
William Holliman
Enlow Ose
Robert Doyle
Don Horel
Mary Elizabeth Alden
Jerry Rioux
Carmichael Branch Library
Sacramento Central Library
Del Paso Branch Library
Martin Luther King Library
McClatchy Library
McKinley Library
CSUS Science-Tech. Library
Sacramento Bee
Sacramento Union



III. LIST OF COMMENTS RECEIVED ON THE DRAFT EIR

A. LETTERS AND MEMORANDA

| <u>No.</u> | <u>Date</u> | <u>Source: Agency or Individual</u> |
|------------|--------------------|---|
| (1) | August 27, 1981 | California Department of Transportation, District 3; E. F. Galligan, Deputy District Director, Planning and Public Transportation |
| (2) | September 10, 1981 | Pacific Gas and Electric Company, Sacramento Division; Keith J. Lamb, Division Land Supervisor |
| (3) | September 16, 1981 | Sacramento Municipal Utility District (SMUD); David Oto, Electrical Engineering Associate |
| (4) | September 22, 1981 | City of Sacramento, Department of Finance; Ken Nishimoto, Administrative Assistant II |
| (5) | September 24, 1981 | City of Sacramento, Department of Community Services; G. Erling Linggii, Acting Director |
| (6) | September 25, 1981 | Regional Transit; Gene Moir, Manager of Planning |
| (7) | September 28, 1981 | Capitol Bicycle Commuters Association; Jim Baetge, President |
| (8) | October 1, 1981 | State Office of Planning and Research; State Clearinghouse, Terry Roberts |
| (9) | October 1, 1981 | State Air Resources Board; Gary Agid, Chief, Local Project Support Branch |
| (10) | October 1, 1981 | California Department of Transportation; R. D. Skidmore, Chief, Environmental Branch |
| (11) | October 1, 1981 | State Reclamation Board; Eldon E. Rinehart, General Manager |
| (12) | October 1, 1981 | League of Women Voters of Sacramento; Lois Woodruff, President |
| (13) | October 1, 1981 | Environmental Council of Sacramento; Tina A. Thomas, President |
| (14) | October 1, 1981 | Morrison Homes; Herman J. Tijsseling, Jr., Development Manager |

- (15) October 1, 1981 City of Sacramento Traffic Engineering Division; Jim Bloodgood, Assistant Civil Engineer
- (16) October 1, 1981 Diepenbrock, Wulff, Plant & Hannegan; John V. Diepenbrock, for Lee Sammis Company (Gateway Centre)
- (17) October 1, 1981 Coldwell Banker; Thomas C. Aguer
- (18) October 1, 1981 McDonough, Holland & Allen; William G. Holliman, Jr., for 885 Investors (Natomas Eastside)
- (19) October 1, 1981 Sacramento Area Council of Governments; Gary L. Stonehouse, Director of Environmental Planning

B. PUBLIC HEARING COMMENTS

Note: Comments are paraphrased in Appendix B.

- (1) October 1, 1981
 - a. Chris Hunter, City Planning Commission
 - b. Robert Doyle, South Natomas Community Association
 - c. George Muraki, City Planning Commission
 - d. Jerry Rioux, South Natomas resident
 - e. Mary Elisabeth Alden, South Natomas resident
 - f. Don Horel, President, South Natomas Community Association

IV. RESPONSES TO COMMENTS

Under CEQA guidelines, the city is required after completion of the DEIR to consult with and obtain comments from public agencies having jurisdiction by law with respect to the project, and to provide the applicant and 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.

The following responses to significant comments made by the applicants, public agencies, interest groups, and members of the public, are organized by topic in the order found in the DEIR. Wherever possible, written and oral comments have been paraphrased and similar comments have been consolidated to allow combined responses.

Some issues raised by reviewers are beyond the scope of a project-specific EIR and, therefore, have not been responded to in detail in this addendum. (The EIR scope was established under CEQA guidelines by the city in its Initial Study of the project.)

A. INTRODUCTION

No comments.

B. PROJECT DESCRIPTION

No comments. See section V. ERRATA herein for correction to Table 4.

C. SUMMARY OF FINDINGS

- I. Comment. (Attachments to letter #16, Diepenbrock for Lee Sammis Company.)
A number of impacts are improperly categorized in the Summary of Findings as "unavoidable and irreversible adverse impacts."

Response. Regarding "unavoidable effects," (CEQA EIR Guidelines require description of "any significant impacts," including those which can be reduced to an insignificant degree, but not eliminated. "Where there are impacts that cannot be alleviated without imposing an alternative design," they should be described. These include, according to the guidelines, "significant impacts on any aesthetically valuable surroundings or on human health." (Section 15143-b). Regarding "irreversible effects," the guidelines stress project related uses of non-renewable resources which may be irreversible (use or preservation thereafter unlikely) and project primary and secondary effects which commit future generations to similar uses (infrastructure improvements, etc.). All impacts summarized on pp. C-2 and C-3 under 2 were categorized as "unavoidable" or "irreversible" on this basis.

2. Comment. (Attachments to letter #16, Diepenbrock for Lee Sammis Company.) The summary (p. C-2) notes a potential demand for additional housing units to meet the needs of "new" job holders, yet fails to include the EIR finding that this need can be met by increasing densities and/or developing 600 to 1,600 additional acres of residential land (p. E-23).

Response. The DEIR states that the additional demand for local housing units as a result of the housing displacement effects of the two projects--approximately 1,800 units--could be met by increasing densities and/or developing additional acres of residential land (pp. E-19 through E-19). These particular mitigation measures were not suggested to address the potential demand for additional housing due to net new jobs generated by the project-- 5,000 to 9,000 units--(see p. E-23, Table 23 and section 4).

3. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The summary (p. C-2) affirms that the projects would have a positive impact on annual city revenues, but does not mention the \$1,750,000 one-time increase in revenue to the city (p. G-8).

Response. Many impacts identified in the text of the report were judged not to be of significant enough importance to rate summary treatment. The summary concentrates on those impact factors which would be considered "significant" under CEQA* and emphasizes adverse environmental effects which would require a mitigating response if the proposed action were to be approved.

4. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The summary (p. C-2) states that "added interest would be drawn to the Natomas area for . . . the conversion of additional agricultural lands to urban uses," but does not qualify this with a reference to p. H-15, where the EIR states that the projects might result in "less pressure for similar office intensive projects in the North Natomas Airport areas." Moreover, the DEIR notes that housing units displaced by the projects can be "accommodated as infill . . . within the metropolitan area" (p. E-21) and thus would not necessitate conversion of additional agricultural land.

Response. The "added interest . . . urban uses" statements on p. C-2 of the Summary and on p. D-5 of the Land Use section refer to the general urban growth inducement effects of business activity and infrastructure improvements brought with the projects. The p. H-15 reference explains that corporate office development will be the one land use component which is likely to be excluded from this general increase in pressures for urbanization.

Statements in the DEIR regarding housing units displaced by the projects being accommodated as metropolitan infill are acknowledged, but are not considered to be highly relevant to the urban intensification effect of project construction and business activity on the Natomas area.

*Chapter 2.5, Section 21068 of the Public Resources Code California Environmental Quality Act or (CEQA) defines "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment.

5. Comment. (Letter #18, Holliman for 885 Investment Company.) The conclusion stated on page C-2 with respect to housing is inconsistent with, and unsupported by, the data contained in the population, housing, and employment section of the report. The conclusion overlooks that portion of new jobs which would be required to support the level of housing development specified in the existing community plan.

Response. The conclusions stated on page C-2 are consistent with and supported by the data contained on p. E-23 of the DEIR--Table 23 and section (4). City general plan land use policies for commercial-industrial and residential uses have been formulated in response to housing and job growth relationships projected for the Sacramento region. The point made on p. C-2 and p. E-23--Table 23 and (4)--is that the level of job growth associated with the projects represents a localized employment surge which, at least in part, is beyond job growth rates anticipated by the city in recent land use planning programs. Thus, to some extent, the job-housing balance could be expected to tilt towards jobs during the project absorption period, generating demands for housing in excess of those anticipated during these recent plan formulation efforts.

6. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The summary (p. C-3) cites as an unavoidable and irreversible adverse impact, that the projects may result in a slower CBD absorption rate and lower CBD rentals, and might retard development of North Natomas business park projects. By contrast, the text points out (pp. H-15-16) that (i) the major impact of the South Natomas projects would probably be on other suburban office parks, (ii) that potential impact on the CBD is less clear than impacts on other suburban office parks, and (iii) that the CBD office space market "may already be established and comfortably occupied" by the time there is substantial activity at the projects.

Response. The statements that the projects might result in a slower CBD absorption rate and lower CBD rentals and might lower the "feasibility of similar office-intensive, business park projects in the North Natomas area" refer to impacts which may be "unavoidable" under the CEQA definition described under I. above. The text does point out on p. H--16 that "potentials for project effects on downtown are less clear than impacts on other suburban office developments", referring to the more speculative nature of this effect. But, the EIR does go on to say that (1) the projects might result in "a decline in the rate of office development (but not the overall level) in the CBD capital zones" (p. H--15-d); (2) "if the amount of office space projected for the Natomas East-side and Gateway Centre proposals is actually developed, the project could be competitive with the central area office market . . . in other similar space markets, adverse effects have occurred" (p. H--15,e.); and (3) "absorption of project office space in 7 to 10 years as proposed would require capturing 45 to 60 percent of the projected regional office market, a portion that would noticeably affect demand for new downtown development (p. H--16, section 2, paragraph 3).

7. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The summary (p. C-3) cites an increase in project-generated emissions as an unavoidable and adverse impact, yet points out that the projects would meet all state

and federal standards. More properly, the projects' impact on air resources should be classified as an insignificant effect.

Response. Regardless of standards, a measurable increase in air emissions due to the projects most definitely meets the CEQA definition of an unavoidable adverse impact (see Comment #1 above). The project's contribution to cumulative air quality impacts would be particularly important.

8. Comment. (Attachments to letter #16, Diepenbrock for Sammis). The projects' impact on water quality is listed inconsistently as being both a notable long-term adverse change, and an "insignificant effect" (p. C-4).

Response. Comment acknowledged. Section 4.b. on page C--4 which lists "drainage and water quality" as a project effect "found not to be significant" is in error.

9. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Table 2 summarizes the projects' impacts on the environment, but fails to distinguish between (i) those impacts which are purely beneficial, e.g., construction employment effects, fiscal impacts, potential positive impacts on diversification of the Sacramento area employment base, etc., (ii) those which may create a significant effect on the environment, i.e., a substantial or potentially substantial adverse effect on the environment by CEQA definition, and (iii) those which have an impact on the environment which is neither purely beneficial nor sufficiently adverse to be treated as a "significant effect" under CEQA.

Response. The DEIR authors believe that it is clear to the reader which impacts summarized in Table 2 would be purely beneficial and which would be potentially adverse. All impacts summarized in Table 2 are considered to be "significant effects" as defined under CEQA.

10. Comments. (Attachments to letter #16, Diepenbrock for Sammis.) Mitigation measures by definition (See 14 Cal. Admin. Code Sections 15032.5, 15085.5, and 15088) are those measures which may be taken to lessen a substantial or potentially substantial adverse impact on the environment. However, no mitigation measures are necessary or appropriate unless a significant, (i.e., adverse) impact has been identified. Table 2, however, lists mitigation measures for impacts which are not adverse, such as the projects' impact on employment in general, and potential to create "new" jobs.

Response. Table 2 includes no mitigation measures with regard to project employment or "new" job impacts.

11. Comments. (Attachments to letter #16, Diepenbrock for Sammis.) Table 2 lists mitigation measures for which the DEIR text indicates only a remote or highly speculative potential to have an adverse effect on the environment, such as the projects' remote potential impact on CBD absorption rates and rental rates.

Response. Potential project effects on CBD absorption and rental rates as described in the EIR are, of course, based largely on professional opinion. How-

ever, to define these potential impact findings as "remote" and "highly speculative" would understate their potential significance. See response to comment #6 above for additional discussion of the potential significance of project effects on the CBD.

Table 2 (summarizing DEIR p. H-17) suggests a project phasing approach which would tend to mitigate project effects on the CBD. Under responses to comments on the Economic Growth and Business Park Demand section of the DEIR, this addendum suggests that such a mitigation measure should be implemented only after initial project absorption activity is shown to have a noticeable effect on the CBD office market.

D. LAND USE

1. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The Land Use section of the DEIR lists as "comparable business parks," development sites which are industrial in character. The "Economic Growth and Business Park Demand" section correctly distinguishes between industrial and office park development.

Response. The term "comparable business park areas" has been used in the DEIR to identify major metropolitan land use concentrations of commerce, including industrial and office activity.

2. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The DEIR states that approval of the project and construction of related infrastructure improvements would generate additional interest in further development and intensification of designated Natomas urban areas, and in the conversion of more Natomas area agricultural lands to suburban uses.

(a) We observe that both project sites are currently slated for development under the SNCP and installation of infrastructure will occur whether the sites are used for homes or for business parks.

(b) Given market forces, pressures for development of additional business parks in the Natomas area lands should not increase, as acknowledged on page H-15 of the DEIR, which states that the projects might result in less pressure for similar office-intensive projects in the North Natomas-Airport areas, at least within the decade.

(c) The DEIR notes that housing units displaced by the projects can be accommodated as infill (p. E-21) and thus would not need to be placed on North Natomas agricultural land.

Response. (a) The DEIR contends that the combination of project infrastructure improvements, the increased business activity attracted by the projects, and their higher visibility, plus the concurrent development of adjacent residential areas, would tend to attract more interest in intensified local urbanization than would residential development alone.

(b) Although the high concentration of office development in the projects would tend to discourage further closeby corporate office development, the DEIR in stating that increased pressures for Natomas area intensification can be anticipated with the projects, refers to numerous other types of urban development including light industrial, distribution and storage, higher density residential, and related support commercial.

(c) Comment acknowledged.

3. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The DEIR states that approval of the projects will result in additional applications to change current land use policy and will result in higher densities on remaining residential areas. The possibility of additional applications is speculative; any increased densities would be in keeping with the SNCP land use designation and would not exceed densities already anticipated in the plan.

Response. The proposed action itself demonstrates that, given a perceived real estate market for a higher, non-SNCP-designated use, applications are likely to be received to modify adopted SNCP land use policies in order to accommodate the higher use. On this basis, the DEIR assumes that applications can be anticipated to increase densities now anticipated under the SNCP.

4. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The Lee Sammis Company has never proposed making Garden Highway a four-lane road between I-5 and Orchard Lane. We do, however, propose to divide the existing four-lane section between I-5 and Natomas Oaks to provide better turning access. Garden Highway west of Natomas Oaks Drive will remain "as is."

Response. Comment noted.

5. Comment. (Attachments to letter #16, Diepenbrock for Lee Sammis Company.) The DEIR lists those general plan policies which it considers "most relevant" to the projects. The Lee Sammis Company believes, however, that the general plan policies cited below are the most applicable to Gateway Centre:

a. "The City recognizes that its future growth is dynamic, affecting the urban growth outside its boundaries as well as being affected internally by external growth forces. It believes that a healthy, attractive environment now and for future generations to enjoy requires considerable effort directed at programs and policies for implementation which address themselves both to the existing urban fabric and to the growth aspects normally associated with expansion. The overriding goal is therefore to improve and conserve existing urban development and, at the same time, encourage and promote quality growth in expanding areas of the City."

b. "Promote the distinctive character and identity of the City in a manner which is compatible with the larger metropolitan area of which it is a part."

c. "Develop a strong, diversified economic base and provide for the orderly distribution of employment and other economic opportunities."

d. "Protect and promote viable, self-containing residential and commercial neighborhoods."

Development of the proposed project will provide an economic infusion into the Sacramento market which will not only provide additional market support for the CBD retail activities, but also for the office activities in the CBD. The project itself is designed for large-scale corporate users and not for the typical CBD tenant. As the DEIR itself indicates, the proposed projects "are directed toward corporate offices of regional significance ('basic' employers) rather than the community-serving office uses" (page D-10).

Response. Applicant's opinions have been noted.

6. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The DEIR states that the projects are nonconforming to the SNCP objective of prohibiting "intrusion of incompatible land uses and disruptive traffic into new and existing residential areas. Offices and residential developments can and do coexist harmoniously. Adjacent townhouses along Natomas Oaks Drive have been carefully designed with inward orientations in order to prevent any possible intrusion. Further, project approval will not substantially increase the number of average daily trips over those resulting from dense residential development, and evening and weekend project-related traffic will be minimal to nonexistent.

Response. Land use compatibility comments acknowledged. The city has not received an application detailing such design characteristics. Regarding trip generation comments, the DEIR indicates that the projects would increase ADT from the site by from 6.7 percent (Gateway Centre alone) to 18.5 percent (both projects)--see p. Table 27 in the ERRATA section of this report.

7. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The DEIR states that the applicant has not submitted market studies justifying the demand for 3.4 million square feet of additional office space, roughly 30 percent of the projected 1980-1990 increase over existing and approved office space in the metropolitan area and that therefore the projects do not conform to SNCP policies. The Lee Sammis Company has in fact submitted a market study by Reel/Grobman and Associates establishing a demand for the Gateway Centre project. The DEIR itself indicates that the proposed action is feasible in the real estate sense, in an economic sense, and that the site is a suitable site for business parks (pp. H-13-14).

Response. Comment acknowledged, particularly with respect to the Reel/Grobman market study prepared for the Gateway Centre project. The DEIR does indicate that the site may be suitable in a market sense for business park use. The DEIR also indicates that use of the site for business park use would result in a range of adverse community and environmental impacts.

8. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The DEIR states that the projects are potentially nonconforming with the SNCP policy to "continue revitalization of the CBD as a major regional commercial center." On the contrary, the projects will complement the CBD. Those CBD office users oriented to city, state, and county government offices are unlikely to

relocate. Moreover, given that state expansion is nonexistent and in fact declining in some instances, demand for office space in the CBD could decline unless there is an economic infusion into the greater Sacramento region. The large suburban office users at Gateway Centre would provide "basic" employment, diversify the economic base, and help ensure the vitality of the CBD. Hence, we believe the development is very much in conformance with the goal of revitalizing the CBD.

Response. Applicant's opinions have been noted. In the opinion of the DEIR authors, however, the projects could adversely affect the rate of absorption and rental rates of CBD office space, particularly in light of the rate of project office space absorption proposed by the applicants (see responses to comment #6 in this report under C. SUMMARY).

9. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The DEIR suggests that land use conflicts between future residential uses along Natomas Oaks Drive and Gateway Centre office and commercial uses, can be reduced by orienting Natomas Oaks residential uses internally, requiring new residential development to include a landscaped buffer along the west side of Natomas Oaks Drive, and by clustering 6-story structures towards the center of the two projects.

Based on recent meetings between the Lee Sammis Company and Morrison Homes, Natomas Oaks developers, there appears to be excellent land use transition between Gateway Centre and the Morrison Homes development. Gateway Centre will restrict building heights to a maximum of two stories along the Natomas Oaks collector street and will include a 40-foot landscape buffer on the east side of Natomas Oaks Drive. Gateway Centre buildings have purposely been located on the site so that they gradually increase in height, with maximum heights along the freeway where they will have the least impact on adjacent residential neighborhoods.

The Morrison plans include landscaped setbacks, inward orientation of development, and zero lot line walls facing eastward toward Gateway Centre, all of which make a suitable land use transition. The single-family and duplex portions of the Morrison development have a minimum number of lots which side on Natomas Oaks Drive and present planning provides for ample setbacks and landscaping. Additionally, as part of the planning process, the planning commission and council will review not only the schematic of the Gateway Centre overall development plan, but also each individual building design as development occurs.

Response. Comments acknowledged. The city has not received an application on this project describing these intra-project and internal project design characteristics.

E. POPULATION, HOUSING, AND EMPLOYMENT

1. Comment. (George Muraki, Planning Commission.) Is there a measure of mitigating increased housing costs resulting from the project?

Response. Adjacent land values and associated housing costs are likely to rise as a result of certain conditions discussed in the DEIR. It will be difficult to find mitigation measures that totally offset price increases. However, demand for units in somewhat higher price ranges in South Natomas is expected to lessen demand in certain other competing locations (the people buying in South Natomas would otherwise purchase the units elsewhere. See DEIR pp. E-22 to E-25). Implementation of Sacramento's own Housing Element would be beneficial and help prevent an undue jobs-housing imbalance and related price effects. The real solution would be a national decision or set of policies to cut the costs of producing and financing homes. Without lower interest rates, other variables are far less likely to favorably influence housing purchase decisions. If interest rates and terms of financing can again be improved, then the mitigation measures discussed in the DEIR are applicable and would go far to assist in balancing regional housing availability and occupancy costs with demand.

2. Comment. (Jerry Rioux, South Natomas Community.) Difficult to understand how the 1800+ housing units displaced are accommodated.

Response. Refer to pp. E-19 to E-25 of DEIR where full discussion is provided. It is useful to note that all DEIR estimates of project-related additional regional housing demand (beyond that currently projected) assume no change in current economic expectations regionally. In other words, a drop-off in expected non-project-related population growth (and the associated demand for housing) due to any cause between 1985 and the year 2000 would mean that project-related net additional housing demand (beyond current projections) would be of a smaller magnitude and much less visible.

The DEIR analysis points out (pp. E-20 and E-21) that there exists under current city-county plans "non-constrained" potential for some 43,000 dwelling units. The maximum project "displacement" of 1,800 units thus represents less than one percent of estimated total regional housing capacity as presently calculated. On that basis, it seems reasonable to assume that there would be room for the 1800+ displaced units originally approved for South Natomas, but displaced by the proposed office/commercial developments.

3. Comment. (Letter #9, Air Resources Board.) Documentation is required to support the use of the 30 percent share when calculating the South Natomas residential portion of anticipated project employment.

Response. The Traffic section figure of 30 percent (DEIR p. F-11) was incorrect (see Section V., Traffic Errata). The actual percentage employed is 23 percent, as indicated in Table 21, p. E-19, and is a combined estimate of professional and other employment, based on expected total employment (both applicants' plans) of 15,800. This translated into 3,590 persons. With South Natomas capable of absorbing some 38,000 to 44,750 new population under various area development alternatives (see DEIR, pp. E-17 to E-25) the 23 percent "estimate" seems not only reasonable, but conservative. The use of discrete numbers is required here to facilitate traffic analysis; otherwise a range would have been employed. A more definite projection is not possible or defensible; too many speculative variables come into play. In the opinion of

the authors of the DEIR, the estimate may in fact be low by 10 to 15 percent, especially as the costs of personal and public transport continue to rise.

4. Comment. (Letter #12, League of Women Voters of Sacramento.) Where are programs to insure adequate training/employment of regional unemployed persons?

Response. Comment acknowledged. Examination of the effectiveness of such programs is not a required element of DEIR analysis. There are numerous programs administered by the State of California and the United States Government. The relative performance of agencies administering employment related training and services is judged more fairly by community groups, industry and legislative bodies.

A special report on the employment impacts of the Gateway portion of the project has been prepared for the applicant by the Business Services Bureau of Sacramento State University (Dr. Robert Fountain leading), and the findings of this research related to local employment demand, training, problems in regional areas and the like are available from the City Planning Department.

5. Comment. (Attachment to Letter #16, Sammis.) Discrepancy in use of calculations of "total" and "net" employment, housing requirements, etc. between DEIR text and Summary.

Response. Comment acknowledged. See amended Summary in section V, ERRATA section of this report.

6. Comment. (Attachment to Letter #16, Sammis.) Project "net" employment should be viewed as a valuable replacement for "declining government employment."

Response. With some 49,500 unemployed in the Sacramento SMSA, any additional new employment opportunities could be important to regional economic health. This fact is recognized in the full DEIR discussion of employment impacts (See pp. E-13 to E-15).

7. Comment. (Attachment to Letter #16, Sammis.) Inconsistency in discussion of mitigation of project housing displacement between the DEIR and Summary.

Response. The DEIR authors maintain that the summary is consistent with the DEIR text with regard to mitigation of housing displacement impacts.

F. TRAFFIC AND CIRCULATION

1. Comment. (C. Hunter, City Planning Commission.) Traffic impacts at I-880 and W. El Camino should be addressed for the I-880 Frontage and NW Quadrant Alternative.

Response. The scope of the DEIR was to focus on the 6 critical intersections impacted by the project. Calculations of traffic volumes at the intersection of I-880 and W. El Camino indicated that levels of service at this location were not going to be significantly reduced by either the Plan or the project. Therefore this intersection was not subjected to further examination in the alternative analysis.

2. Comment. (Don Horel, South Natomas Community Association.) Will office land uses undermine the planned transit orientation of South Natomas?

Response. According to Regional Transit there is no plan for future transit service to the South Natomas area. In any event, DEIR P. G-7, section (5), indicates that the office land uses would be less amenable to transit service than would residential uses.

3. Comment. (Letter #1, CalTrans.) We strongly disagree with the conclusion stated on page F-15 that "the levels of service on roadways outside of the project area are not expected to be lowered as a result of this project." At this time, traffic on southbound I-5 in the morning peak is critical at the core area off-ramps, specifically the "J" and "Q" Streets ramps. A new, southbound on-ramp at Garden Highway and I-5 has been suggested by project proponents. This ramp is not considered feasible because it would increase morning congestion at the "J" and "Q" Streets off-ramps, the only available access ramps to the downtown area. This impact should be addressed. Excessive expense and weaving problems present additional concerns regarding the suggested ramp.

Response. CalTrans' understanding of the project impacts is not entirely correct. First, the statement made on page F-15 of the DEIR (referred to above) does not compare levels of service with the project to "current" traffic levels, but to future traffic levels if the adopted SNCP were fully developed. In this case, the project would result in a reversal of directional flow, causing traffic to be attracted to the site (I-5 northbound) in the a.m. and the reverse in the p.m. As a result of the reversal, a.m. levels of service on southbound I-5 at "J" and "Q" off-ramps would be less than levels anticipated with build-out under the current SNCP.

A new southbound I-5 on-ramp at Garden Highway was not proposed; only use of the existing southbound on-ramp was considered.

4. Comment. (Letter #1, CalTrans.) As the South Natomas community approaches build-out, traffic volumes will dramatically exceed the capacity of some freeway design features. The most critical problem will be caused by the limited capacities of the weaving section between the I-5 northbound Garden Highway on-ramp and the northbound West El Camino off-ramp, and the reverse southbound weaving section between the West El Camino on-ramps and the Garden Highway off-ramp. The absolute capacity of each of these weaving sections is only 2200 vehicles per hour (the sum of the combined on-ramp and off-ramp volumes). The weave capacity limitations indicate future operational problems, a critical problem if business offices were to be placed in an area served by the I-5/Garden Highway interchange. Incoming southbound trips in the morning from I-5 to proposed business offices would have to weave

across the high number of southbound trips entering from West El Camino. The reverse problem would exist in the evening.

Response. The freeway impacts outlined by CalTrans are acknowledged and have been added to the amended traffic analysis in the ERRATA section of this report.

5. Comment. (Letter #1, CalTrans.) It is stressed that land use decisions throughout the city should try to maximize the utility of the proposed light rail transit. It is recommended that the city encourage office development served by the light rail while discouraging it in other portions of the city.

Response. Comment acknowledged. The project would not complement any proposed light rail plans as currently proposed for Sacramento.

6. Comment. (Letter #1, CalTrans.) A proposed ramp from eastbound Garden Highway to southbound I-5 has been suggested as a possible I-5 interchange modification. For a number of reasons it is recommended that no further consideration be given to this proposal. First, such a ramp would be substantially on structure and would be excessively expensive. There would be weaving problems between this new ramp and the Richards Boulevard off-ramp at the south end of the American River Bridge. Further, to the extent that it would add more traffic to I-5, it would increase morning congestion at the downtown access ramps at "J" and "Q" Streets. It would also tend to concentrate more commuters into the return evening peak hour, which would increase congestion on off-ramps into the South Natomas area.

Regarding a second DEIR proposal to widen the West El Camino structure over I-5, funding from the State Highway Account is extremely scarce and even Federal-Aid Urban financing has many competing uses. In order for the West El Camino structure to be widened, the project would have to be included in the State Transportation Improvement Program (STIP). Since there is little hope of State funding being available to widen the West El Camino structure, inclusion of the project in the STIP would undoubtedly require a stipulation that non-State funds would be used to pay construction costs. Inclusion in the STIP would also require justification of the need to widen the West El Camino overpass.

CalTrans is not insensitive to the problems that will exist with the now committed urbanization of South Natomas. This office strongly supported allocation of a portion of discretionary financing from the Secretary of Business, Transportation and Housing to help initiate transit service into the area. That has led to the now current RT services to South Natomas. Although transit will help, it appears that other mitigation measures will also be necessary to prevent major deterioration in the level of service on the I-5 and I-880 freeways. By the time of full build-out, it is quite likely that ramp metering and high occupant vehicle ramp bypass lane strategies would be warranted along I-5.

CalTrans would also like to point out that if current rates of development continue, the ramp terminal intersections at both Garden Highway and West El

Camino will warrant signalization within a few years. CalTrans may have difficulty financing them in a timely manner, and quite likely would seek financial participation from the city of Sacramento.

Response. Comment noted and acknowledged.

7. Comment. (Letter #6, Regional Transit.) The DEIR should recommend measures that would permit RT to provide transit services to the business parks to accommodate 6 percent of all trips generated by the development in 1990. Such measures should include capital and operating contributions made by the developers or tenants of the part to RT.

Response. The city should require that the project developers implement a comprehensive transit use program which includes an investigation of mechanisms by which the project could contribute to the the costs of providing future transit service to the South Natomas Business Park area.

8. Comment. (Letter #6, Regional Transit.) We do not fully concur with the DEIR findings that van-pooling is not a viable way to serve the business parks area. We feel that there is enough potential for various ridesharing options such as van/carpools and subscription bus service as the business parks develop.

While we believe that the mitigation measures and traffic improvements suggested in the DEIR will provide adequate access facilities for transit vehicles to the parks, we strongly recommend that the city secure transit improvements, as needed, from the various developers in the business parks area as a prerequisite to granting development permits.

Response. Once the business park begins to develop, it will be easier to identify the specific types and sizes of employers being attracted to the project area and, consequently, to determine whether real potentials for ridesharing exist. Until that time, it will be difficult to assign specific ridesharing goals for mitigating traffic impacts.

9. Comment. (Letter #7, Capitol Bicycle Commuters Association.) CBCA urges the city to take advantage of the unique opportunities for bicycle commuting in the South Natomas area and impose requirements on the developers of the proposed business parks to encourage bicycle commuting. While there is risk that the expenditures proposed will not result in significant numbers of bicycle commuters, it seems certain that underplanning and under providing for attractive, safe, and secure bicycle commuting facilities would prevent employees from bicycle commuting and would force automobile or crowded bus use for commute trips.

Response. Comment acknowledged. The promotion of a bicycle program among future project tenants should be a required mitigation for the project developers.

10. Comment. (Letter #13, ECOS.) If either or both developments are permitted, there is no way to accommodate the traffic that will be generated. The interchange at I-5 and West El Camino is hopelessly inadequate and can never be

made a four-way intersection. As a result, feeder streets in the area, intended for residential use without business hour peaking, will become congested and dangerous. The document's comments about staggered work hours at the development are empty talk, as they cannot be required or enforced.

Response. Comments noted.

11. Comment. (Letter #15, City Traffic Engineering.) Regarding DEIR description of the local street system (p. F-1, section 1.a.(2)), Natomas Oaks Drive has been completed from Garden Highway to approximately 600' south of W. El Camino Avenue. The connection between Garden Highway and W. El Camino does not exist.

Response. Comment acknowledged. Page F-1 corrected in ERRATA section.

12. Comment. (Letter #15, City Traffic Engineering.) Figure 11 (DEIR, p. F-2) indicates that W. El Camino Avenue will ultimately be developed to a 6-lane facility. Under base case assumptions in "Planned Roadway Improvements," on p. F-1, W. El Camino is indicated to be a 4-lane facility with bike lanes. The 4-lane configuration is consistent with the community plan.

Response. Comment acknowledged. Figure 11 corrected in ERRATA section.

13. Comment. (Letter #15, City Traffic Engineering.) Regarding transit service (DEIR p. F-3), it is our recommendation that transit usage might ultimately be 6 percent during the peak periods and 2 percent overall.

With the adoption of light rail as the preferred alternative use for I-80 bypass funds, Regional Transit has indicated that an 11 percent reduction in existing bus service throughout the community can be expected. In addition, a September 23, 1981, article in the Sacramento Bee titled "S. Natomas Bus Future is Dim," indicates that a new bus line in South Natomas is experiencing a severe lack of patronage and may be discontinued.

Based on these considerations, stating that 6 percent transit use is "very conservative" and "worst case" seems unsubstantiated and unrealistically optimistic.

Response. City staff's differing opinion from SRTD staff regarding the term "very conservative" has been noted. City staff's opinion regarding the DEIR authors' use of the term "worst case" is acknowledged. The term has been removed from the discussion (see ERRATA section).

14. Comment. (Letter #15, City Traffic Engineering.) Trip generation values in Table 24, DEIR p. F-4, do not correspond to land use values given in the SNCP. This can be very important if these values were used to determine levels of service for SNCP buildout and comparisons to the proposed project and alternatives.

Response. Comment acknowledged. Clarification of the land use types and the associated trip generation rates have been made in a revised Table 27. See ERRATA section.

15. Comment. (Letter #15, City Traffic Engineering.) For the Level of Service F definition in Table 26, DEIR p. F-8, an indication of +100 percent capacity is misleading. At Level of Service F, traffic flow is constricted and volume is reduced from theoretical capacity at Level of Service E. "Not meaningful" would be a better indication of Level of Service F.

Response. Comment acknowledged. Level of Service F represents jammed conditions.

16. Comment. (Letter #15, City Traffic Engineering.) Under Project Impacts, DEIR p. F-9, methodology and assumptions are found in Appendix G, not Appendix A. Adjustment factors for bus delay, lane utilization, pedestrian conflicts, etc., are not given in this Appendix.

Response. Correction to Appendix G reference acknowledged and incorporated in ERRATA section herein.

17. Comment. (Letter #15, City Traffic Engineering.) Regarding DEIR discussion under Project Effects (p. F-9, (1)), it is the city of Sacramento's experience that peak hour traffic volumes roughly approximate 10 percent of the ADT. The values shown are extremely small (in the neighborhood of 4 to 7 percent) in comparison to the ADTs indicated.

Also, Table 27 does not clearly indicate increases of 187 percent and 56 percent in p.m. peak hour volumes as stated.

Response. Revised Table 27 in the ERRATA section now shows the appropriate ADTs and corresponding peak-hour volumes.

18. Comment. (Letter #15, City Traffic Engineering.) Regarding DEIR p. F-11, c. Regional Analysis, a 30 percent employee population in South Natomas seems extremely high, and may unrealistically raise the level of service at critical intersections.

Response. Comment acknowledged. The 30 percent figure was in error and should have been 23 percent. The ERRATA section includes this correction. The DEIR assumed that 30 percent of the project employees would live in the South Natomas area; but only 10 percent of the total home-to-work trips were assumed to be generated within the study area (referred to as internal). It was this 10 percent portion that has been used in calculating trip distribution and assignments, as is shown in Table 29 of the DEIR.

19. Comment. (Letter #15, City Traffic Engineering.) Under Regional Analysis, DEIR p. F-15, W. El Camino and Northgate and W. El Camino and Truxel are two intersections in the region which could be significantly affected by traffic increases attributable to the proposed projects.

Response. The scope of the DEIR as originally defined in detail by the city, was to focus on the 6 critical intersections directly impacted by the project. However, as revised Figures 12 through 15 in the ERRATA section show, West El Camino at Truxel are expected to experience a 93 percent increase in a.m. peak-hour traffic westbound (to the project) and a 44 percent increase in p.m. peak-hour traffic eastbound, as a result of the project.

20. Comment. (Letter #15, City Traffic Engineering.) Detailed information regarding turning movements and through traffic at major intersections should be shown as well as volumes on freeway ramps. (See DEIR, pp. F-6, F-7, F-14, F-15, and Figures 12 through 15.)

Response. Detailed work sheets showing turning movements and volumes at major intersections as well as all other data prepared for the traffic analysis have been submitted to the city staff for review in response to this comment. The objective of providing a DEIR of manageable size limited the amount of background data included in the report appendix.

21. Comment. (Letter #15, City Traffic Engineering.) Figure 14 shows a 140-vehicle change in traffic volumes by merely crossing a drainage canal. This seems highly unlikely without intersecting streets.

Response. The maps used in the traffic section show only major streets, and do not show a minor north-south collector running parallel to and east of the drainage canal.

22. Comment. (Letter #15, City Traffic Engineering.) Figure 15 (with projects) shows Garden Highway eastbound between Natomas Oak Drive and I-5 to have a p.m. peak-hour volume of 205. Figure 13 (without projects) indicates a volume of 1420 for the same location. These volumes need to be reevaluated.

Response. Error acknowledged. Revised Figure 15 in the ERRATA section correctly shows the peak volumes on this link.

23. Comment. (Letter #15, City Traffic Engineering.) City staff made the following comments regarding traffic mitigation measures, DEIR, pp. F-16 through F-18:

(a) Natomas Oaks Drive/W. El Camino Avenue Intersection Improvement. The additional travel and turning lanes will require additional land from the proposed projects and increase major street costs. In addition, this will require the widening of the W. El Camino Avenue overcrossing.

(b) I-5 Northbound Off-Ramp and W. El Camino Avenue Interchange. This will require the widening of the W. El Camino overpass at I-5. It may be found that this can only occur on the south side of the structure due to existing development on the northeast corner of the quadrant. Widening on the south side only will require the off-ramp from I-5 to begin farther south, thus affecting the weaving area of the northbound Garden Highway/I-5 on-ramp and this ramp.

(c) Natomas Oaks Drive/Garden Highway Intersection Improvements. Additional right of way will be required for Garden Highway and may require the widening of the levee which would be extremely costly.

(d) I-5 Southbound Off-Ramp/Garden Highway Improvements. Improvements of this type require massive amounts of capital and, even then, may not meet state standards for handling freeway merging and weaving requirements.

(e) Comprehensive South Natomas Capital Improvement Program. It seems that this is in conflict with earlier statements indicating that the proposed projects would not affect regional circulation--we agree that financing of the above measures will be complex and difficult and must be resolved prior to action on these projects.

(f) Flex-Time or Shortened Work Weeks. Enforcement of such a measure by the local government agencies seriously compromises the viability of such a condition. It is considered a very weak mitigating measure due to lack of concrete evidence indicating its success.

Response. Comments (a) through (d) and (f) are acknowledged and should be considered in subsequent review procedures for the two projects. Regarding comment (c), the capital improvements program described on DEIR p. F-17 is intended to address vicinity traffic impacts only; the program as described would not include consideration of regional effects. Clarifications are added to this description in the ERRATA section.

24. Comment. (Letter #15, City Traffic Engineering.) General comments on financing of mitigation measures (DEIR pp. F-16 through F-18):

Many of the measures required to increase levels of service at critical intersection to "C" or better are extremely expensive and somewhat vague in description. For example, what are the limits of the proposed widening of Garden Highway as described in Item C on Page F-17, and what cost is associated with the levee widening? A more detailed description of additional right-of-way takes is required to give a better idea of improvements required.

It would be convenient to have a separate table indicating capital improvements required for the SNCP and the proposed projects and the cost for each improvement with a final total for each plan. Although it is stated that the capital expenditures for these improvements are beyond the scope of this report, the city feels the costs must be known and construction funds outlined before a decision on the proposed projects is made.

With the change from residential to office park, the "one time revenues" to the city will change as shown in Table 32, DEIR p. G-8. Is the "Construction Excise Tax" shown on this table the same as the Major Street Construction Tax; and, if it is, can this source of funds contribute to the city's share of the proposed mitigating measures?

If these funds are not adequate, an assessment district would be required which would necessitate the development of cost/benefit ratios for very broad-reaching improvements, such as freeway interchange improvements and levee widening. With today's interest rates, assessment districts of the magnitudes required to construct some of these street improvements would be very difficult to form.

Response. These comments support the DEIR's preliminary findings that mitigation measures in the form of additional major physical improvements and flex-time can not be easily implemented (see DEIR p. F-16). The preparers of the DEIR were asked by the city to identify possible ways of mitigating traffic impacts of the project. In doing so the authors listed the above measures, but cautioned that the physical and economic feasibility of each was questionable. The authors further recommended that the city investigate their feasibility, in detail, before approving any measures. It is not within the purview of an EIR to detail engineering and cost specifics of these extensive roadway improvement needs.

Most importantly, the DEIR further recommended on p. F-17, measure (e), that a comprehensive South Natomas Capital Improvements Program be undertaken to more specifically define area-wide circulation needs associated with the project and, in response to those needs, develop a detailed, phased capital improvements plan. The plan in turn would be used to establish phased financing requirements and fair-share contributions by project sponsors in the zone-of-benefit.

25. Comment. (JHK attachment to letter #16 for Sammis.) The average daily traffic (ADT) estimates in this document are greatly in error. The amount of traffic shown to be generated by the commercial and office development is high by a factor of 3. As a point of reference, JHK's analysis shows an ADT of 230,000 trips for the South Natomas Community Plan area as compared to 503,000 trips in the DEIR.

Response. Error acknowledged. Tables 24 and 27 in the DEIR were prepared separately from the CH2M HILL traffic analysis and did not use the correct land use assumptions. The revised Tables 24 and 27 in the ERRATA section of this Final EIR addendum indicate the correct traffic generation figures used by CH2M HILL in the DEIR traffic flow analysis. These revised ADT figures show an estimated 227,390 ADT generated by SNCP buildout vs. approximately 269,500 ADT from the combined projects. These numbers are very close to the JHK estimates stated above. Again, it should be noted, that the DEIR's analysis of peak hour traffic flows and resulting levels of service were based on the correct traffic generation assumptions; therefore, no change in level of service conclusions were needed. This is supported by the fact that the independent analysis of peak hour volumes by JHK are nearly identical to figures in the DEIR. (See following JHK comment.)

26. Comment. (JHK attachment to letter #16 for Sammis.) Despite the difference in the ADT estimates, the DEIR peak hour traffic is quite close to that estimated by JHK. However, there are two areas of difference between the two reports as follows:

(a) The EIR used different intersection lane configurations, thus resulting in different levels of service. Thus far, we have been unable to document the precise extent of this difference, and need further information from the EIR consultant.

(b) JHK used a more detailed and more accurate zone system in the traffic assignment which resulted in more traffic being assigned to the I-880 interchange than was the case in the DEIR. With more than twice as many zones, our analysis more accurately defines the desired path in terms of minimum travel time, and thus has more precisely defined travel patterns in the South Natomas area.

Response. The similarities between JHK's independent traffic analysis and CH2M HILL traffic analysis for the DEIR are acknowledged. Concerning the first difference (a), a copy of the lane configurations used in the DEIR analysis has been submitted to city staff. The authors are confident that the assumptions used to prepare the DEIR are very similar to those used by JHK for the applicant. Concerning the second difference (b), CH2M HILL differs with JHK on the distribution of trips to I-880. The DEIR assumes that more traffic would use I-5 than I-880 (traveling in an opposite direction to most trip destinations), an assumption which was reviewed and approved by the City Traffic Engineering Department early in the study.

27. Comment. (JHK attachment to letter #16 for Sammis.) The EIR does not provide background data to verify the capacity calculations. These will be required prior to making a more detailed analysis.

Response. It is not the responsibility of the DEIR author, nor a CEQA-mandated requirement, that detailed or raw background data be provided to an applicant to verify calculations in the DEIR traffic section. The intent of CEQA has been fully met in the traffic section of the DEIR. Specifically, Section 15150 of the Guidelines for Implementation of CEQA states:

"An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate" (emphasis added).

28. Comment. (JHK attachment to letter #16 for Sammis.) The EIR does not take into consideration several factors which will affect the overall traffic impact of the business parks. For example, the residential development planned for the South Natomas area is not expected to reach buildout until the year 2020. There should be some mention of the year when capacity problems may develop.

Response. Knowing precisely when such impacts will occur is highly speculative, will not change the ultimate magnitude of the impact, and is not directly relevant to how the problem might be mitigated.

29. Comment. (JHK attachment to letter #16 for Sammis.) The DEIR does not give full credit to the traffic benefits that can accrue from an aggressive program of transportation management ("TSM") actions on the part of the developer such as work schedule techniques, vanpooling, and parking management. Given these factors, the overall impact of the proposals is much less than is stated in the DEIR, and these conditions should be noted. Recent findings from a project in Orange County documents a 35 percent reduction in peak hour trips as a result of TSM improvements.

Response. The DEIR authors, along with city staff, considered various TSM measures as possible mitigation measures, but could not substantiate their benefits, given the absence of an implementation plan by the developer or an enforcement program through the city. Specifically, no evidence exists to support the application of: expanded transit service with employee subsidies (considering that the city and RT feel the 6 percent transit service used in the DEIR is already quite optimistic); work schedule techniques (the potential benefits of flex-time are discussed on p. F-17 of the DEIR); vanpooling (discussed on p. F-18 of the DEIR; considered to be largely ineffective in this case); and, parking management techniques (it seems unlikely that future tenants would support high parking fees for employees in a location where ample space for parking is a major marketing factor).

G. PUBLIC SERVICE AND FISCAL ASPECTS

- I. Comment. (Letter #4, Nishimoto, City of Sacramento Finance Office.) The estimates of revenues and costs to the city of Sacramento may be off due to changes in the outlook for city share of taxes and subventions.

Response. All DEIR calculations of city revenues and costs for South Natomas alternatives were developed following consultation with the Sacramento City Manager's Office and other offices during the early Summer 1981. It is recognized that the full development of the project(s) as proposed might increase the city's share (estimated at 12 percent currently) of the countywide property tax revenue under the current formula. However, it is not possible to estimate with accuracy the total countywide or city property values over time; therefore, using other than current percentages would seem a risky exercise. Further, a 2 percentage point increase in the estimates prepared would increase the total tax revenue flow to the city by only \$35,000 per annum within a total of \$250,000. Thus changing the city share figure by small percentages does not materially change the impacts noted.

The DEIR authors agree that the "net" sales tax generation to Sacramento City may well be less, as purchasing is shifted from other locations to the projects in South Natomas. The DEIR does not attempt to generate this figure and others of a countywide nature on a net basis, since such an exercise would be too highly speculative for EIR purposes. The flow of subventions will of course affect the "lost" revenue from loss of population calculation. The values used were drawn from city figures current when this analysis was underway in May - June 1981. If, in fact, per capita subventions are decreased (as state and federal aid to localities is decreased), then population related "losses" would

not be as severe in these terms. The area of intergovernmental revenue flows is always fluid, subject to rapid change and, at best, difficult to measure generally. DEIR order of magnitude estimates should suffice to show relative effects of the project alternatives.

2. Comment. (Attachment to Letter #16, Sammis.) Summary does not mention DEIR findings relative to city revenue gain from on-time charges including permit fees, connection fees and the like.

Response. See response to comments on Summary section.

3. Comment. (Attachment to Letter #16, Sammis.) DEIR calculations of total project construction value are low and should reflect values over the ten year building program.

Response. The calculations in question (DEIR pp. E-15 and E-16) are related to estimates of the man-years of construction employment supported by project construction. It is assumed that wages and material costs would rise in direct proportion or closely to rises in the as-built costs of construction over time; thus the current or present value calculation is valid and meaningful. The value used (in this case \$275 million) is, in fact, not "market value" or "assessed value", but "construction cost". These values typically vary substantially. Of the three, construction cost is least difficult to predict with any reliability and, is thus employed in this estimate.

H. ECONOMIC GROWTH AND BUSINESS PARK DEMAND

1. Comment. (Robert Doyle.) There may be other sites in the North Sacramento area suitable for the potential project users.

Response. There may be other existing, serviced larger parcels suitable for "campus -setting" commercial centers at the scale proposed. However, two marketing factors appear to be affecting the applicants' decisions: (1) the relative shortage of comparably situated properties, and (2) the rather favorable growth outlook for properties between Sacramento City and the regional airport.

2. Comment. (Mary Elizabeth Alden, South Natomas community.) What has changed locally since SNCP adoption in 1980 to make these projects "necessary"?

Response. The DEIR objectively discusses local economic conditions, including locational aspects with respect to commercial real estate activity in the Sacramento region (see sections E and H). The applicant(s) have employed market analysis, real estate reasoning, and promotional terms to develop justification for projects, which is, of course, understandable. The driving force behind this private investor interest in the South Natomas area is the measurable potential for office and related development in Sacramento. This potential has recently increased as the DEIR analysis indicates. It is possible that these non-residential development pressures were not as evident in 1977-1980 when the SCNP was produced and adopted.

3. Comment. (Attachment to Letter #16, Sammis; Letter #17, Coldwell Banker.) DEIR statements indicating extent of potential project/CBD conflicts are not justified. Plan conformity issue is not valid.

Response. The DEIR Summary and text point out a small potential for project impact on the CBD. See Summary in ERRATA section of the report, and full discussion on DEIR p. H-16. The patterns of office space use described are familiar and easily documented in many urbanizing areas. Applicant holds certain opinions related to real estate market that may or may not coincide with other professionals in the industry. The DEIR analysis clearly indicates (p. H-16) that little, if any, substantial impacts on the CBD would be expected if the project were to be approved, assuming a more reasonable 9 to 12 year project absorption rate, although some relocation of firms (primarily business services) would be anticipated over time. There are always firms in central business districts that find occupancy costs too high; relocation to suburban office centers is a classic solution.

4. Comment. (Attachment to Letter #16, Sammis; Coldwell Banker.) Phasing project development not justified as related to CBD impacts.

Response. The intent was to mention phasing as a method whereby adverse impacts on CBD, demonstrated over the first two or three years of project absorption, might be minimized. See summary ERRATA herein and DEIR discussion on pp. H-16 and H-17. The relationship of total commercial space use in the proposed project to regional absorption was examined as well, and the timing of the development within South Natomas as it might affect regional space use absorption was discussed in the same sections of the DEIR.

5. Comment. (Letter #17, Coldwell Banker.) Many of Sacramento's newest "campus setting" office projects have enhanced the surrounding residential area.

Response. The ability of the proposed South Natomas business parks to generate this emotion on the part of nearby residents is the opinion of the writer. Differing views do emerge in various situations; many residents of other similar areas have voiced strong objection to mixed use, related traffic, and illumination impacts, noise and the like.

6. Comment. (Letter #17, Coldwell Banker.) The DEIR market review does not adequately address the locational aspects (suburban, mainly) of regional commercial development activity in recent years.

Response. DEIR pp. H-11 to H-13 adequately cover scale and locational aspects of recent development trends, including increasing suburbanization of Sacramento office space in recent years.

7. Comment. (Letter #17, Coldwell Banker.) Few sites exist in the Sacramento region to accommodate development as planned for project.

Response. The comparative advantage of the project location vis-a-vis other regional locations available is fully discussed on DEIR pp. H-1 through H-17.

Whether or not additional large, serviced parcels become available for development is a function of public policies and investor capability. At this writing the South Natomas parcels have locational advantages for the types of commercial use proposed; however, necessary general plan and community amendments must be approved.

I. SOILS AND SEISMICITY

No comments received.

J. DRAINAGE AND WATER QUALITY

No comments received.

K. AIR RESOURCES

1. Comment. (Letter #9, ARB.) There appears to be a discrepancy between the projected vehicle miles traveled shown in Table 30 and Table 46.

Response. Error acknowledged; see ERRATA section, Traffic and Circulation, Tables 30 and 47 in this report. (Letter #9, ARB.)

2. Comment. (Letter #9, ARB.) The air quality analysis used EMFAC 5 instead of EMFAC 6C (updated) emission factors.

Response. The air quality analysis has been revised using EMFAC 6C. (See ERRATA section, Air Resources, Tables 45 and 47, in this report). The updated emission factors resulted in approximately a 9 to 25 percent increase in peak hour carbon monoxide concentration for both the SNCP and the project. The revised gross emission analysis (see Table 47) for the Sacramento air basin did not change noticeably using EMFAC 6C. However, revision of the revised vehicle miles traveled; (Traffic ERRATA Table 30) resulted in slightly lower emissions with the use of EMFAC 6C.

The assumptions used in the revised calculations were the same as those used in DEIR. The errata for Tables 45 and 47 states these assumptions.

3. Comment. (Letter #9, ARB.) The DEIR needs to include an analysis of the projects impact relative to the 8-hour (CO) standard.

Response. The scope of the DEIR air quality analysis was limited to average daily and peak hour impacts and did not include an analysis of 8-hour traffic and air quality impacts.

4. Comment. (Letter #9, ARB.) The DEIR needs to correct the discrepancy between Table 46 indicating a 36 percent increase in traffic and the text (p. K-7, paragraph 4) indicating a 28% increase in emissions.

Response. Comment acknowledged. The amended Table 30 (traffic) and Table 47 (air resources) in the ERRATA section of this report correct the discrepancy and now show a one-to-one correlation in terms of VMT and total emissions.

5. Comment. (Letter #9, ARB.) A quantification of emissions generated by the project should be shown.

Response. Air Resources errata Table 47 in this Addendum shows the total emissions from the project and compares that amount to the Sacramento Air Quality Plan.

6. Comment. (Letter #9, ARB.) The DEIR should address any mitigation measures to offset the projected air quality impacts.

Response. The Air Resources impact analysis in the DEIR takes into consideration the same mitigation measure used in the traffic section, namely, use of transit car/van pooling and flex-time and staggered work hour. Page F-3 states that a 6 percent transit usage was assumed in the traffic analysis. It should be noted that the Regional Transit District considers this percentage to be optimistic and consequently would not agree that transit service could be further expanded to realize a greater than 6 percent modal split.

On the subject of vanpooling, the DEIR stated on page F-18 that the measure would not significantly reduce vehicle trips. JHK and Associates, who were commissioned by the Gateway Center developer to conduct a separate traffic analysis for the project, stated that ridesharing and van pooling could account for a 5 percent share of the vehicle trips from the projects. A 5 percent reduction in vehicle trips would not significantly reduce either local or regional air emissions from site-generated traffic.

On page F-17, the DEIR states that flex-time would be effective in reducing peak hour traffic levels and thus reduce volumes and congestion at impacted intersections. This measure would result in reduced emission concentrations along roadways and would be especially effective where air quality standards could potentially be exceeded. Flex-time, however, would not reduce the number of daily vehicle trips or total miles traveled and therefore would not help to reduce total regional emissions generated by project traffic.

Other vehicular traffic reducing measures include provisions for bicycle and pedestrian routes. Although the project could be made more conducive to bicycle commuters, it is unlikely that a successful bike program could reduce vehicle trips by more than 2 percent. Again, this amount would have only a minor effect on air quality levels generated by the project.

7. Comment. (Letter #9, ARB.) The DEIR p. K-7, states, "Sacramento Area Council of Governments (SACOG) has stated that development and corresponding emissions from the South Natomas area were included in the projected growth for the Sacramento Air Quality Management Plan (AQMP)." This statement is partially correct; SACOG has included the South Natomas area in its air quality analysis for the 1982 plan. The assumptions that were made were based upon

residential development, however, and not light industry as proposed. Therefore, this project is not consistent with the AQMP and the DEIR needs to address this inconsistency.

Response. The DEIR authors agree that the SDACOG Air Quality Plan assumed mostly residential development for the South Natomas area. The authors disagree, however, with the conclusion that a change in land use types (from residential to office/commercial) is a basis for determining DEIR inconsistencies with the Air Quality Plan. The DEIR assumes that consistency is a factor of air quality levels, and projects that do not cause violations of standards or exceed the regional growth increment are consistent with the intent of the Plan. If, for example, a project proposed different land uses than those assumed in the Plan, and the different use generated less ADT's, less vehicle miles traveled, and lower air quality levels, it would be difficult to conclude that the proposed project would be inconsistent with the Air Quality Plan.

Concerning the South Natomas Business Park, our analysis shows that the project would cause a 1 to 3 percent increase in projected regional highway vehicle related air quality levels. According to SACOG, this increase would prevent Sacramento area's attainment goal for 1987. Therefore, in this sense the South Natomas Business Park would not be inconsistent with the Air Quality Plan.

8. Comment. (Letter #19, SACOG.) The estimated 2.1 to 3.3 percent increase in highway vehicle emission (from the project) is totally inconsistent with the intent of the draft Air Quality Plan.

Response. The revised gross emissions from the project (see Table 47 in the ERRATA section of this report) show an increase of 1.4 to 3.0 percent in regional highway vehicle emissions. According to the new draft AQ Plan, the federal air quality standard for ozone would be exceeded by 1987 without an additional 17 to 18 percent reduction in hydrocarbon emissions. Therefore we concur with SACOG's statement that 2.2 percent increase in regional hydrocarbon emissions from this project would not be consistent with the Air Quality Plan.

9. Comment. (Letter #19, SACOG.) The mitigation section should be greatly expanded to include actions like employer-sponsored ridesharing programs as well as bike and pedestrian support programs to reduce the associated mobile source emissions.

Response. The Traffic and Circulation section of the DEIR discusses various ways of reducing vehicle miles traveled. These include promoting increased transit service, shortened work weeks and vanpooling. Vanpooling was dismissed as an effective measure for reducing projected traffic volumes for the reasons discussed on p. F-18 of the DEIR. However, until employee/employer characteristics are identified after project operation, the effectiveness of such measures as vanpooling, ridesharing, and bike and pedestrian programs cannot be confidently assessed nor can the effectiveness of use of these measures be guaranteed by the applicants.

10. Comment. (Letter #19, SACOG.) The DEIR does not cover the aspect of toxic materials from sophisticated high technology manufacturing.

Response. The DEIR addresses only conceptual proposals for changes in land uses from the adopted SNCP. The assessment of impacts concentrates on non-specific developments such as commercial and business-professional office. There are no specific project tenant proposals (i.e. high-tech manufacturing) from the applicants at this time.

L. VISUAL AND OTHER DESIGN IMPACTS

1. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Approval of Gateway Center will result in a significantly more attractive "gateway" into Sacramento than will residential development.

Response. There are no aspects of office park development in general which are generally characterized as inherently "more attractive" than residential development characteristics. The visual impact of both office/commercial and residential land uses is determined on a project-specific basis primarily by the particular design characteristics of each individual project. No specific residential development proposals have been submitted for the Gateway Centre site which are available for comparison with the current Gateway Centre office/commercial scheme in terms of I-5 corridor treatment.

In conclusion, similar opportunities for effective "gateway" design treatments of the two sides and median of the I-5 corridor are present with both residential and office/commercial development.

2. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) We cannot concur with the subjective postulation that the proposed projects would create a visual intrusion on the freeway, subject project employees to distracting views of the freeway, and that an undulating noise wall is preferable to berms.

Response. In reference to the proposed Natomas Eastside site plan, the DEIR has noted that the "relatively shallow office building setbacks" from I-880, "in combination with proposed building heights up to 6 stories, could create an impression of visual intrusion on the freeway" (DEIR, p. L-9,(2)). The statement refers to the relationship of a 6-story structure (approx. 72 feet high) with the setbacks shown in the Natomas Eastside plan (approx. 65 feet from the I-880 r-o-w) to the freeway.

This building height/freeway setback ratio may be "intrusive" in the freeway view, particularly relative to the architectural scale and setback ratios of other current and planned development in the project vicinity (proposed minimum Gateway Centre I-5 setbacks, for example, vary from 130 to 150 feet--a less intrusive distance).

Similarly, the DEIR notes that office buildings adjacent to the I-5 and I-880 freeway would have potentially distracting views of I-5, referring to the distracting effect of a direct, predominant foreground view from primary office space of 55-mile-per-hour traffic on 8 lanes of freeway.

The impact of such views can be reduced to a large extent by effective roadside and median strip landscaping.

Finally, the DEIR does not state that "an undulating noise wall is preferable to berms." On the contrary, the DEIR states that a "noise wall would be unnecessary and inappropriate for the office side" and that the "freeway view along the site frontages would be dominated by a corporate office complex, probably separated from the freeway by landscaped berms rather than an undulating noise wall. The berms and other landscaping features would accent views of structures rather than block them."

3. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The EIR failed to address the significant planning issue about the appropriateness of locating residential vs. commercial/office uses adjacent to a freeway. There is little to be said in favor of subjecting homes to freeway noise and air pollution impacts.

Response. Comment acknowledged.

4. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) We would disagree that SNCP build-out would appear as a single homogenous residential area. Since I-5 already bisects the SNCP and is quite wide, including landscaped open space, South Natomas will already be perceived as two communities with I-5 being a barrier and separator. Gateway Centre will, in fact, provide a visual as well as a natural sound buffer for the west side residential and will not require the unsightly sound wall now proposed.

Response. Comment noted.

5. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The idea that the office projects would "weaken" the "gateway" effect is arbitrary and terribly subjective to interpretation.

Response. The DEIR states on p. L-9 that "distinct differences between the scale of the proposed projects and that of designated residential development on the opposite side of the route, plus differences between the two projects themselves, would tend to weaken the entranceway effect" which could result under the current SNCP. However, the DEIR also states on p. L-12, mitigation measure c.(1), that coordinated roadside landscape treatments between the two projects and with the opposite side of the freeway would reinforce the gateway effect.

6. Comment. (Attachments to letter #16, Diepenbrock for Lee Sammis Company.) Regarding potential losses of mature trees cited in the DEIR, the Lee Sammis Company will save the existing trees that are healthy (similar to Point West) and they will be incorporated into the landscape concepts.

Response. Comment acknowledged. Special Permit review procedures should ensure that healthy trees are retained.

7. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The tops of two-story buildings will be at +30 feet. It is unlikely that one could see onto the roofs of these lowest buildings from the tops of overpasses (typically not more than 25 feet in height).

Response. Comment noted. Special Permit review procedures should seek to confirm this relationship.

8. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Parking lots will be landscaped per city standards which require extensive tree planting to develop 50 percent shade in 15 years. Thus, parking lots will be heavily landscaped and attractive to office users viewing them.

Response. Comment acknowledged.

9. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Lighting of parking areas is already required by the city to not glare or intrude into adjoining properties and streets.

Response. City does not have such requirements (traffic engineering looks at glare on streets, but not at glare intrusion).

10. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) All structures in Gateway Centre adjoining Natomas Oaks Boulevard will be maximum two stories in height behind 40 feet of landscaping, and heights will relate to adjoining residential uses.

Response. Comment acknowledged. This design criterion was not made available to DEIR authors.

11. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Buildings have been zoned to gradually increase height away from abutting residential areas. Maximum heights in the development have been located towards the center of the project and along I-5 where they will relate stronger to the high speed freeway and have the least impact on adjoining residential users.

Response. Comment acknowledged. This design criterion was not made available to DEIR authors.

M. NOISE

No Comments.

N. ENERGY

1. Comment. (Letter #2, PG&E.) DEIR, p. N--1, l.a., paragraph 2, implies that east-west transmission line traversing project is a source of energy supply for project. Line is owned by PG&E, and therefore service cannot be acquired from it since it is within SMUD service area.

Response. Comment acknowledged. East-west transmission line traversing site would not be available as a direct source of electrical power.

2. Comment. (Letter #2, PG&E.) No mention of PG&E high-pressure gas transmission line paralleling the electric facilities.

Response. Comment acknowledged. Gas transmission line would be available as direct source of natural gas energy.

3. Comment. (Letter #3, SMUD.) Any additional electrical demand due to proposed projects will require changes to SMUD's present South Natomas general layout plans. Changes might include right-of-way acquisition for a 69,000-volt subtransmission line and site acquisition for a substation.

Response. Comment acknowledged. Estimated 60 percent increase in South Natomas community energy needs due to projects may require such changes in SMUD plans.

4. Comment. (Letter #3, SMUD.) DEIR should contain estimated kilowatt demand data as well as energy data in Table 53.

Response. Project energy consumption is estimated in therms. Paragraph 1 on page N--1 explains that a therm is a unit of heat energy equivalent to 20 kilowatt hours of electricity.

5. Comment. (Letter #3, SMUD.) It is difficult to compare "apples with apples," since Table 50 contains data for the entire South Natomas area and Table 53 contains data for the proposed projects only.

Response. Comment is inaccurate. For purposes of direct comparison, Table 50 contains data for the project sites only if they were to develop according to the 1978 South Natomas community plan (see p. N--1, l.b, paragraph 1, for explanation of energy tables).

6. Comment. (Letter #8, OPR, State Clearinghouse.) It should be pointed out in the EIR that a recent California Attorney General opinion states that a tentative map of a subdivision must be disapproved if it fails to meet the solar design requirements of Government Code Section 66473.1.

Response. Comment acknowledged.

7. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Table 53 (p. N-6) indicates 750,000 square feet of commercial development at Gateway Centre site, whereas only 75,000 square feet of commercial development is proposed. Correcting that error results in a total annual energy consumption of 5,704,150 therms versus 6,635,650 therms, a 38 percent increase in energy consumption over the SNCP rather than the 60 percent increase stated in the report.

Response. Typographic error acknowledged. Table 57 (p. N-6) indicates 750,000 sq.ft. of commercial development, whereas only 75,000 sq.ft. has been

proposed. Error is typographical and does not affect estimated energy consumption results. The estimated 60 percent project increase in energy consumption remains unchanged.

8. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) Many energy saving options used regularly in other areas are not cost effective (payback is too lengthy) in Sacramento due to lower SMUD power costs. Those energy saving options that are cost effective will be incorporated when the project is developed. SMUD may alter their rate structures in the future to make additional options cost effective.

Response. Comment acknowledged.

9. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) It is legally inappropriate to generate solar access standards for this project unless the city intends to implement the program throughout the city.

Response. Comment acknowledged. Suggested measure meant for citywide application.

10. Comment. (Attachments to letter #16, Diepenbrock for Sammis.) The project architect for Lee Sammis Company had the following additional comments with regard to mitigation considerations listed on p. N-9.

Item (b), we do this automatically, as appropriate
Item (c), refers to residential
Item (d), more residential in application
Item (e), more residential in application
Item (f), represents good planning and is partially mandated by city already
Item (g), this is appropriate
Item (h), refers to residential
Item (i), solar space heating and water heating have not proven to date to be cost effective or appropriate on commercial projects. Solar water heating is somewhat silly, based on office building hot water demand.
Item (j), this is appropriate
Item (k), this is appropriate
Item (l), we always provide minimum site lighting that will still provide security (about 1/2 foot candle average throughout)

Response. Comments noted.

O. VEGETATION AND WILDLIFE

No comments received.

P. ARCHAEOLOGY

No comments received.

Q. ALTERNATIVES TO THE PROPOSED ACTION

1. Comment. (Alden, Horel.) Shouldn't the DEIR address alternative sites throughout the city, rather than concentrating on the Natomas area?

Response. The scope of the EIR included comparative evaluation of 5 alternatives to the proposed action, each defined by the Sacramento City Planning Department. In presenting a fairly extensive comparative evaluation of these 5 alternatives, the DEIR goes considerably beyond the level of alternative analysis found in most EIR's.

In the interest of reasonable work scope and preparation of a manageable EIR document, the City Planning Department limited the alternative assessment to those 5 alternatives staff believes are most representative of real alternatives to the proposed action and respond to development pressures for construction of a major suburban office concentration near the convergence of I-5 and I-880, the downtown, the airport, and expanding residential concentrations.

2. Comment. (Letter #19, Holliman for 885 Investment Company.) The alternatives section of the DEIR fails to consider the alternative of approving only one of the two projects without further changes in the existing community plan.

Response. Such alternatives were not included in the alternative section of the DEIR since the body of the DEIR discusses the effects of the two projects. As explained below under GENERAL COMMENTS, the DEIR indicates project-specific effects (Natomas Eastside and Gateway Centre) in many impact categories. In addition, a supplementary traffic analysis of the effects of each project on intersection levels of service in the South Natomas area has been included in this Final EIR Addendum (see Appendix C).

R. GENERAL COMMENTS

1. Comment. (Doyle, Alden.) Will the projects improve or diminish the quality of life in the South Natomas community?

Response. Whether or not the effect of the proposed action on the "quality of life" in the South Natomas area and the Sacramento region would be a positive or negative one involves a subjective judgment based on the projects' impacts on a combination of factors including: visual perception of the area; land use compatibility; local population, housing, and employment characteristics; local traffic and circulation; public services; general economic growth and diversification; and noise. The impact of the proposed action on each of these factors has been described in the DEIR under the appropriate headings.

2. Comment. (Letter #8, OPR, State Clearinghouse.) There is no assurance that feasible mitigation measures recommended in the DEIR for various impacts will be implemented. The EIR should identify who will be responsible for financing and implementing proposed measures.

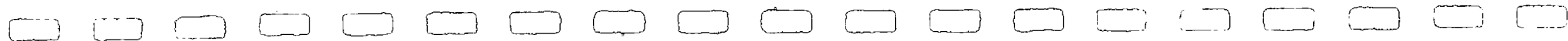
Response. Mitigation measures suggested in the EIR are intended for consideration and action by the Planning Commission and City Council in their review of the proposed action. These two development review bodies can require that any or all of the recommended onsite measures be incorporated into the project design. Responsibility for implementing and financing offsite measures would also be determined by Planning Commission and City Council action. Where necessary, the EIR suggests specific financial responsibilities and mechanisms for implementing offsite mitigation measures (see p. D--23, line 6; p. D-23, section b; p. F-17, section e; p. J--4, section 3.a(1) and c(1); and p. N--5, section 3, paragraph 3).

3. Comment. (Letter #19, Holliman, for 885 Investment Company.) It should be noted that the project addressed in the EIR consists of the combined projects --two substantially different projects with substantially different impacts both in kind and degree. Each project must be individually assessed with respect to its impacts and the ability to mitigate those impacts. The DEIR fails to address each project on its own merits and to break down the cumulative data.

Response. A combined project EIR has been prepared for the Natomas East-side/Gateway Centre projects in the interest of evaluating two applications of very similar nature and timing at adjacent locations. The applications were evaluated together to determine the likely worst case effects of two large campus style office-commercial applications on contiguous sites, in response to the same market conditions, which would displace similar close-in residential designations within the same segment (west side) of the same planning area (the South Natomas community). Within this work scope, the DEIR does indicate specific effects of each project in many impact categories (housing displacement, land use policy and compatibility relationships, jobs generated, traffic generated, fiscal effects, visual and other design concerns, vegetation and wildlife). For other impact categories, there would be little distinction between the impact characteristics of the two preliminary project descriptions (soils and seismicity, archaeology).

In light of the severity of the combined traffic generation impacts on critical intersections throughout the South Natomas community, a supplementary analysis has been made of the effects of each project alone on intersection levels of service. That supplementary traffic analysis is included in the South Natomas Final EIR herein under Appendix C.

V. ERRATA



Errata A: Summary

C. SUMMARY OF FINDINGS

r Note: Lines which have been revised based on responses to the DEIR are indicated
r below by the letter r in the margin adjacent to the change.

The following section includes a summary of impact conclusions drawn from the body of this report described in terms of CEQA-required impact categories,* plus a summary of impacts and mitigations chart listing impacts and mitigation measures for the 13 community and environmental factors assessed in the report.

I. CHANGES IN GROWTH-INDUCING EFFECTS

a. Land Use

(1) Land Supply. Approval of the proposed plan amendments would result in changes in the total available land supply for various types of urban growth, with associated implications for population and economic growth. Such changes would include:

- An increase in the city's vacant commercial-office-industrial land supply of 201 acres (+ 4 percent)
- A decrease in the city's vacant residential land supply of 202 acres (- 2 percent)

(2) Pressures for Similar Development. Project approval and construction of related infrastructure improvements would increase interest in and pressures for development of additional business parks, residential development, and related support activities on other Natomas area lands.

On the other hand, the scale of project office development would reduce demands for similar, office-intensive land absorption in the Sacramento area over the next decade.

b. Employment

The projects would generate approximately 15,800 jobs directly, and 7,900 to 15,800 secondary jobs, or from 23,600 to 31,600 total jobs. The total would represent around 12 to 18 percent of the 180,000 to 200,000 new job increment anticipated in the metropolitan area (SMSA) between 1980 and 2000.

Of the total jobs generated by the projects, perhaps 15,000 to 20,000 would be "net new jobs" (filled by new labor market entries who were not previously working in similar jobs elsewhere in the area).

* State of California Office of Planning and Research, CEQA: The California Environmental Quality Act, Law and Guidelines, April 1981, Section 15143.

c. Population and Household Growth

(1) Housing. Attracting such a portion of total projected regional job growth suggests some new or unprojected growth in Sacramento population and housing stock. Based on the above "net new job" scenario, demand for 5,000 to 9,000 additional housing units could be anticipated--a 4 to 7 percent increase over the level of new units now anticipated between 1980 and 2000 in the SMSA.

(2) Population. The additional housing units would translate into an additional (non-projected) population increment of 12,600 to 22,600 people in the SMSA over the 1980-2000 period, a 1.0 to 1.7 percent increase over the current year-2000 population projection of 1.3 million.

d. Traffic and Circulation

Increases in peak hour traffic volumes would occur on all major roads in the vicinity of the project. The most noticeable effects would occur at the intersections of I-5 with Garden Highway and West El Camino Avenue. Levels of service on the freeway links would not change significantly.

e. Public Service Needs

The proposed changes in South Natomas land use would generally reduce overall public service needs. Police and fire protection needs would not change significantly. The number of elementary students would diminish, reducing by one the number of needed schools in the community. All major site infrastructure would be provided by the developers. The projects would reduce public park needs by 22 acres. The projects would have an overall positive, but minor impact on annual city revenues (less than a one percent increase) under current revenue collection procedures.

f. General Economic Growth

The project would add to recent trends towards diversification of the regional economic base. The nature of project office provisions would attract new employment sectors to the region--including corporate headquarters, high-technology tenants and large information-processing firms--which would broaden the regional economic base and help offset declines in public sector employment.

2. UNAVOIDABLE AND IRREVERSIBLE ADVERSE IMPACTS

a. Land Use. The project would eliminate approximately 201 acres of designated residential land. Added interest would be drawn to the Natomas area for further intensification of currently designated urban areas and the conversion of additional agricultural lands to urban uses.

Potentials for land use conflict would be created between the proposed office-commercial activities and future residential development to the west.

b. Population, Housing, and Employment. Attraction by the projects of a large portion of total projected regional job growth (between 12 and 18 percent of total 1980-2000 SMSA employment growth) would probably generate new or "unprojected" growth in Sacramento, as described under CHANGES IN GROWTH-INDUCING EFFECTS, pages C-1 and C-2.

c. Traffic and Circulation. Project traffic would increase volumes and significantly decrease levels of service at all major intersections in the vicinity. Many traffic impacts could be mitigated through feasible improvements to the roadway system. However, an unacceptable PM peak hour level-of-service "F" (jammed conditions) at the I-5 southbound off-ramp intersection with Garden Highway could not be mitigated without major capital expenditures.

d. Public Services. See CHANGES IN GROWTH-INDUCING EFFECTS, pages C-1 and C-2.

e. Economic Growth. Absorption of the projects 3.66 million square feet of office-commercial space over a ten-year period might result in: (a) a decline in the rate (although not the ultimate level) of development in the CBD/Capitol zones; (b) a decline in the feasibility of similar office-intensive, business park projects in the North Natomas-Airport areas, at least within the decade; and (c) slightly less diversification in other competing business park projects developing in the region (i.e., less emphasis on office components).

Absorption of project space over a 10-year period would imply an office market penetration rate of from 33 to 40 percent of projected demand, and could create a drag in the market for downtown and other office space locations (i.e., slower absorption and reduced rent potentials). A project absorption period of around 12 years would be less likely to retard demand for downtown and other office space.

The main effect on the Sacramento CBD of office space overbuilding in the Natomas area would occur if relocation of existing CBD occupants became a trend.

f. Air Resources. Onsite CO levels would increase by as much as 31 percent at specific locations (+ 0.1 to 2.9 ppm) but would remain below federal and state one-hour standards (35 to 40 ppm). Total project-generated gross emissions would increase roughly 28 percent over SNCP buildout emissions. The regional impact would amount to a 2 to 3 percent addition to the projected 1990 emissions inventory (a level consistent with the intent of the Sacramento AQMA Air Quality Plan).

g. Noise. Comparison of the projected 1990 site noise environment with the proposed project footprints indicates that buildings in Gateway Centre along I-5 would be in the state's "conditionally acceptable" category.

3. SHORT-TERM USE VS. LONG-TERM ENVIRONMENTAL PRODUCTIVITY

Both the current SNCP and the proposed project scenarios would result in the loss of production and open space values associated with 270 acres of existing agricultural lands. Approval of the projects would not change this ultimate effect.

The proposed changes in land use would result in resource impacts of a greater magnitude than those with SNCP development in the areas of air quality, water quality, energy consumption, and visual qualities. The most notable long-term adverse changes include those described below.

a. Air Quality. See UNAVOIDABLE AND IRREVERSIBLE ADVERSE IMPACTS on page C-3.

b. Water Quality. With the proposed land use changes, total annual non-point water pollutant loadings of suspended solids would increase by about 40 percent over SNCP loadings. Although absolute discharges from the site would be insignificant relative to total upstream suspended solids loads in the Sacramento River, project increases would contribute incrementally to loadings from the metropolitan area, which, in turn, would further reduce downstream water quality.

c. Energy Consumption. Annual energy consumption for operational purposes (lighting, heating, cooling, etc.) would be approximately 60 percent greater with the projects than with SNCP development. Additionally, annual transportation-related energy consumption would be about 90 percent greater with the projects than with SNCP development. Overall project annual energy consumption would be about 80 percent greater than SNCP development.

d. Visual Qualities. The projects would change the vicinity from a homogeneous, residential-scale suburban landscape as planned in SNCP, to a mixed-scale office center/residential concentration distinctly different in character from the area east of I-5. With construction of the projects in lieu of SNCP uses, project frontage along I-5 would be perceived as an extension of the existing commercial/industrial central area across the American River. The separator effect of the river between suburban fringe areas to the north and commercial areas to the south would be lost. The river would simply divide new from existing commerce.

4. EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of Sacramento Planning Department in its Initial Study of the project determined that a number of possible environmental effects would be insignificant or could be adequately addressed by city staff in the development review process without further environmental assessment in this report. The most important of these are:

a. Beyond certain traffic safety risks to project occupants which are discussed in this report, the two projects would not have any significant effect on human health in the community.

b. Beyond the issues addressed in this report, the project would not have significant adverse effects on any other environmental, economic, or social factors.

Project changes in the level of environmental effect on the following factors discussed in this EIR were also found to be insignificant:

- r a. Soils and seismicity;
- r b. Vegetation and wildlife; and
- r c. Archaeology.

5. SUMMARY OF IMPACTS AND MITIGATIONS

The following chart (Table 2) summarizes the impact findings and mitigation measures for the 13 community and environmental factors assessed in this report.

Table 2 SUMMARY OF IMPACTS AND MITIGATIONS

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|----------|--|---|
| LAND USE | <p>a. South Natomas west side land use would change from single-purpose residential to mixed-purpose residential/office; overall South Natomas community land use would remain predominately residential.</p> <p>b. On a <u>metropolitan</u> scale:</p> <ul style="list-style-type: none"> • displacement of residential areas by a regional-scale business park would reduce ability of South Natomas community to function as residential concentration in close proximity to Central City • city's planned residential land area would be reduced by 2 percent, commercial/office land area increased by 4 percent • projects would be first major extension of office-commercial land use into Natomas area • development of a fourth concentration of business park activity in metro area would be officially initiated by project approval • construction of projects and related infrastructure would increase interest in further intensification of designated urban areas in South Natomas, and the conversion of more North Natomas agricultural lands to urban uses • heavy project emphasis on office space would reduce diversity (office allocations) in other future regional business park developments, particularly in Natomas area <p>c. On a <u>community</u> scale:</p> <ul style="list-style-type: none"> • pressures would increase in South Natomas to: <ul style="list-style-type: none"> - develop secondary commercial, office, and distribution uses - increase densities in remaining residential areas, replacing extensive single-family designations with more townhouse, cluster, and multifamily designations • Garden Highway widening would reduce riverfront recreational opportunities <p>d. Proposed land use changes may be partially or totally inconsistent with the following current planning policies and regulations:</p> <ul style="list-style-type: none"> • prohibitions on introducing incompatible land uses and disruptive traffic into new and existing residential areas (South Natomas Community Plan) • prohibitions on regional-scale commercial development in South Natomas, particularly that which may compete with CBD (SNCP) | <p>a. Project housing displacement impacts could be offset by increasing South Natomas average residential densities on one or both sides of I-5 (infrastructure constraints may limit the feasibility of this measure)</p> <p>b. Consider fair-share applicant contributions toward cost of revising west-side land use policies and development criteria to properly guide mixed-use residential/office development</p> <p>c. Reduce land use conflicts between Natomas Oaks residential PUD and Gateway Centre through:</p> <ul style="list-style-type: none"> • inward orientation of Natomas Oaks units • landscaped buffer along west side of Natomas Oaks Dr. (similar to Gateway Centre side) <p>d. Apply design considerations specified in this EIR to landscaped corridor along Main Drainage Canal</p> <p>e. Consider project design review criteria listed in this EIR in evaluating requests for height variances</p> |

C-6

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|------------------------------------|---|--|
| LAND USE cont. | <p>r • SNCP requirement that proponents of additional commercial and office development clearly justify demand to satisfaction of city (Natomas Eastside project only)</p> <p>r • continued revitalization of CBD as a major regional commercial center (Central City Community Plan)</p> <p>• encouragement of public and private office development in CBD (CCCCP)</p> <p>• full utilization of existing office structures and areas in central city (CCCCP)</p> <p>• coordination of city plans and programs based on Central City Community Plan findings and recommendations (CCCCP)</p> <p>• approved residential land use mix of Natomas Oaks Schematic Plan (includes Gateway Centre site)</p> <p>e. Sacramento Zoning Ordinance provisions would require:</p> <p>• rezoning to allow project land uses and protect I-5 corridor</p> <p>• variances for structures greater than 35 or 40 feet (depending on new zoning)</p> | |
| POPULATION, HOUSING AND EMPLOYMENT | <p>a. Total project direct and indirect employment could range from 23,700 to 31,600 jobs (15,800 direct and 7,900 to 15,000 secondary)</p> <p>b. Project-related employment opportunities could have following effects:</p> <p>• significant number of jobs would be provided near concentrations of SMSA unemployment</p> <p>• some project-generated jobs could be filled by persons from area's high unemployment categories with moderate training</p> <p>• significant opportunity to further diversify area's employment base, reducing high local dependence on declining government employment</p> <p>c. Residential distribution of direct employment households would be throughout region. Some 30 percent of professional workers and 20 percent of nonprofessional workers likely to reside in South Natomas; other concentrations in north and south Sacramento growth areas</p> | <p>r a. To offset housing <u>displacement</u> impacts:</p> <p>• allow slight increase in average residential densities in offsite South Natomas* and/or North Sacramento communities; and/or</p> <p>• allow residential conversion of up to 240 acres beyond existing urbanization</p> <p>b. To reduce general housing affordability impacts:</p> <p>• consider average density increases in South Natomas* and North Sacramento</p> <p>• offset monthly housing costs through voluntary or mandatory residential energy conservation programs</p> <p>* Sewer collection capacities in South Natomas are limited; density increases would probably require associated sewer improvements</p> |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---|--|---|
| POPULATION, HOUSING AND EMPLOYMENT cont. | <p>d. Indirect employment households would be distributed roughly in proportion to direct employment households</p> <p>r e. Total project-generated jobs (direct and indirect) would bring r roughly 5,000 to 9,000 net new households to region, and an equivalent demand for that amount of additional housing beyond that currently planned between 1980 and year 2000 (+4 to 7 percent)</p> <p>f. Construction employment effects would include:</p> <ul style="list-style-type: none"> • direct generation of construction industry employment levels which would occupy perhaps 10 percent of 1985 Sacramento-Yolo-Placer construction workforce during project construction phases • secondary generation of an unknown amount of construction-related employment for project-related public works activities • secondary generation of employment (primarily retail and service) resulting from income changes of construction workers • improvements in regional construction trade unemployment rates, especially if slump in residential work continues through decade • residential construction displaced by proposals could reduce net project-related construction employment benefits, unless most displaced construction shifts to other locations in region | <p>c. In response to below-market-rate housing demands:</p> <ul style="list-style-type: none"> • implement related measures in city's 1980 Housing Element • consider density bonuses in return for selling percentage of units to below-market-rate home buyers at or near "cost" • consider adoption of "inclusionary zoning" which would require new residential projects over 10 units to sell a percentage of units at below-market-rate prices |
| TRAFFIC AND CIRCULATION | <p>a. Project-related trip generation characteristics:</p> <p>r • proposals would more than double average daily trip rate (ADT) r <u>from project sites</u> (74,600 ADT vs. 32,500 ADT for SNCP)</p> <p>r • proposals would increase <u>community-wide</u> (South Natomas) traffic r volumes by 18.5 percent</p> <p>r • PM peak hour <u>outbound</u> traffic from project sites would increase r by 230 percent; PM inbound by 25 percent (see Table A2 in Appendix G)</p> <ul style="list-style-type: none"> • local directional flow would be reversed from that expected under SNCP; traffic would be attracted to project sites in mornings and away from sites in evenings <p>b. The following severe levels-of-service (LOS) impacts can be anticipated:</p> <ul style="list-style-type: none"> • totally unacceptable LOS F/F (AM/PM) at intersections of: <p>r - Natomas Oaks Dr./W. El Camino Dr. (B/C under SNCP)</p> <p>r - I-5 Southbound Offramp/Garden Hwy (C/D under SNCP)</p> | <p>a. Improve Natomas Oaks Drive/West El Camino Avenue intersection</p> <p>b. Improve I-5 northbound off-ramp/West El Camino Avenue interchange</p> <p>c. Improve Natomas Oaks Dr./Garden Hwy. intersection</p> <p>d. Improve I-5 southbound off-ramp/Garden Hwy. intersection</p> <p>e. Establish "flex-time" programs to diffuse peak-hour traffic generation.</p> <p>(Note: Van-pooling would not be an effective traffic-reducing measure with these projects.)</p> |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---|--|--|
| <p>TRAFFIC AND CIRCULATION cont.</p> | <ul style="list-style-type: none"> • Unacceptable LOS F/C (AM/PM) at I-5 Northbound Off-Ramp/W. El Camino intersection (A/B under SNCP) • Unacceptable LOS A/F (AM/PM) at the Natomas Oaks Dr./Garden Hwy intersection (A/A under SNCP) • Generally acceptable decreases in LOS (to C or above) at other nearby intersections <p>c. LOS ratings on roadways outside community area are not expected to be lowered by project traffic</p> <p>d. Direction of regional peak traffic flow would not change significantly from SNCP</p> | |
| <p>PUBLIC SERVICES AND FISCAL IMPACTS</p> | <p>a. Changes in public service needs relative to SNCP development:</p> <ul style="list-style-type: none"> • dwelling unit reductions and office space increases would result in less police service demands • fire protection costs not significantly affected • road and traffic signal maintenance needs would increase; increases partially offset by fewer miles of public streets to serve proposed uses • drainage costs would be higher; storm runoff about 50 percent higher for office uses than residential uses (added drainage costs borne by users through assessment district); drainage system capacities still adequate • proposals would require 21.5 fewer acres of public park than housing under SNCP, saving net capital park development cost of \$580,000 and annual maintenance cost of \$100,000 • proposal would reduce community school requirements by one, due to dwelling unit reductions • since new schools are financed by developer contributions and state funds, reduced school needs would have no beneficial effect for local taxpayers • conversion of site lands from housing to office use would result in a land use pattern less amenable to efficient transit service; nevertheless, service to South Natomas may be provided in some form in long-range future | <p>a. Require fair-share contributions from applicants and other new projects in area towards a vicinity capital improvements program which includes the planning, designing, and construction of road improvements recommended herein</p> |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|--|---|---------------------|
| PUBLIC SERVICES AND FISCAL IMPACTS cont. | <p>b. Changes in public revenue generation:</p> <ul style="list-style-type: none"> • estimated one-time construction excise tax revenues approximately \$753,000 greater for Gateway Centre, \$926,000 for Natomas Eastside, and \$1,679,000 for combined projects • estimated one-time building permit fee revenues roughly \$60,000 greater for Natomas Eastside, \$34,000 for Gateway Centre, and \$94,000 for combined projects • one-time sewer connection fee revenues for all of South Natomas would be less with project proposals; revenue reductions not a problem since less sewage would be generated by office uses <p>c. Changes in annual tax and fee revenues:</p> <ul style="list-style-type: none"> • additional annual property tax revenues to all jurisdictions estimated at \$1.10 million from Natomas Eastside, \$690,000 from Gateway Centre, \$1.79 million total; city would receive 12 percent or \$215,000 per year (1981 dollars) • estimated annual sales tax revenues are \$64,000 greater from Natomas Eastside, \$71,000 greater from Gateway Centre; \$135,000 greater for both projects • annual state subvention revenues (population based), including motor vehicle in-lieu fees, gas tax, and cigarette tax, would diminish by \$41,000 due to Natomas Eastside, \$63,000 due to Gateway Centre; and \$104,000 with both projects • federal general revenue sharing and community development block grants would decrease by \$20,000 due to Natomas Eastside, \$31,000 due to Gateway Centre; \$52,000 with both projects <p>d. Overall, projects appear to create a net increase in one-time revenues (development fees, connection fees and costs, etc.), as compared to SNCP</p> <p>e. Annual project revenues would exceed operating costs by an estimated \$300,000 more than with the current SNCP.</p> | |

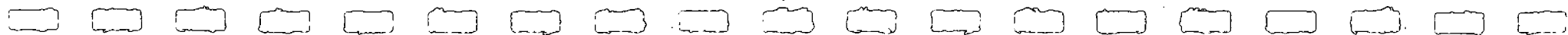
| CATEGORY | IMPACTS | MITIGATION MEASURES |
|--|---|---|
| ECONOMIC GROWTH AND BUSINESS PARK DEMAND | <p>a. Consideration of office demand and related site suitabilities indicate that projects at proposed location represent a good real estate prospect</p> <p>b. Project effects on regional office-commercial development might include:</p> <ul style="list-style-type: none"> • a decline in rate of office development (but not the overall level) in CBD/Capitol zone • less pressure for similar (office-oriented) projects in North Natomas-Metro Airport area and other regional locations, at least within the decade • slightly less diversification in other competing projects, i.e. less office space, especially developments proposed to include a range of business park uses (light industrial, research and development, distribution, commercial office) at locations along Highway 50 or closer to Placer Co. <p>c. Proposed rate of project office space absorption could result in adverse impacts on regional office market, decreasing space expansion absorption, and rental rates in CBD, and in suburban office concentrations throughout the region, and other regional projects</p> <p>d. CBD office space market may be established and occupied to an acceptable degree before substantial project impacts occur; main effects of any "overbuilding" in South Natomas area on CBD would occur at later date, if significant relocation of tenants occurs</p> | <p>r a. If proposed action is approved, and after two or three years of r absorption the project appears to be having a significant effect on the r annual suburban (regional) and CBD office market, a 10-year rather r than 7-year project construction phasing should be considered.</p> <p>b. Continue and increase implementation of Sacramento Central City Community Plan improvement measures (light rail connection, etc.) to reinforce CBD office market.</p> |
| SOILS AND SEISMICITY | <p>a. Primary soil concerns are shrink-swell and differential settling--both can be more damaging to the larger building and pavement areas associated with office-commercial development</p> <p>b. Seismic risks to structures could include the following:</p> <ul style="list-style-type: none"> • damage due to ground shaking, lateral spreading, soil compaction, lurching, and possible liquefaction--all associated with local potentials for strong ground motion; some due to high ground-water levels • potential for localized failure of channel banks due to strong ground shaking during storm flows <p>c. Dust generation would be primary soils impact during construction activities</p> | <p>a. Use standard engineering measures to reduce shrink-swell effects, differential settlement, and other potential soil impacts</p> <p>b. Require a geotechnical study to evaluate site potentials for liquefaction</p> <p>c. Require standard building code (UBC) measures to assure structural earthquake resistance</p> |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---------------------------------|---|--|
| DRAINAGE AND WATER QUALITY | <p>a. Fifty percent greater runoff volume likely with project, as compared with current SNCP land uses</p> <p>b. Pump station capacity sufficient to drain project sites; pump station operation increases would reduce pump service life and increase operating and maintenance costs</p> <p>c. High site groundwater levels could hamper underground utility construction and flood unprotected basements</p> <p>d. Projects would increase estimated runoff pollutants by 40 percent over SNCP; increases statistically insignificant relative to total Sacramento River loadings, but would contribute cumulatively to downstream water quality problems</p> | <p>a. Drainage recommendations include:</p> <ul style="list-style-type: none"> • prepare engineered drainage plans utilizing standard engineering approaches listed in the EIR • require 35-foot maintenance easement along Natomas Main Drainage Canal <p>b. Water quality measures:</p> <ul style="list-style-type: none"> • establish long-term, private project street cleaning program • make payments to Reclamation District 1000 for fair share of canal silt removal costs |
| AIR RESOURCES | <p>a. On a community scale, projects would increase carbon monoxide (CO) emissions at some locations over levels projected for SNCP; increases would remain below state and federal standards</p> <p>b. Project-generated gross emissions would increase about 20 percent over site-related SNCP emission projections</p> <p>c. Project would increase 1990 regional emissions inventory by 2 to 3 percent; increase would be consistent with Sacramento AQMA Air Quality Plan.</p> | <p>a. Emission increases would not affect project compliance with current regulations</p> <p>b. Project point-source impacts would be mitigated through Sacramento County Air Pollution Control District "Authority-to-Construct" permit process</p> |
| VISUAL AND OTHER DESIGN FACTORS | <p>a. General effects on site and vicinity:</p> <ul style="list-style-type: none"> • South Natomas community would be perceived as three distinct areas, due to contrasts in project building scales rather than as one homogeneous residential community bisected by a freeway • main drainage canal visual values could be adversely affected by Natomas Eastside development • future residential development along Natomas Oaks Drive opposite Gateway Centre could have direct views into office areas, and be exposed to views from offices (loss of privacy) <p>b. Effects on I-5:</p> <ul style="list-style-type: none"> • I-5 corridor between I-880 and American River would be perceived as extension of central city commercial-industrial landscape, diffusing threshold effect of river • SNCP possibilities for a visually balanced I-5 entry corridor would be reduced | <p>a. Specific design measures are described in EIR for:</p> <ul style="list-style-type: none"> • project visual compatibility with surrounding uses • drainage canal parkway treatments (Natomas Eastside) • I-5 corridor treatments • I-880 corridor treatments • Garden Highway treatments • rooftop mechanical equipment screening • exterior lighting design • specific onsite Natomas Eastside design concerns • specific onsite Gateway Centre design concerns |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|--|---|---------------------|
| <p>VISUAL AND OTHER DESIGN FACTORS cont.</p> | <ul style="list-style-type: none"> • southbound I-5 views along project frontages would be dominated by corporate office building scales; views of tree-lined riverbank would be blocked by office and commercial structures <p>c. Effects on I-880:</p> <ul style="list-style-type: none"> • similar to effects on I-5 • shallow office building setbacks in combination with heights up to 6 stories could create visual intrusion on freeway • freeway would remain as northern edge of Sacramento urbanization, as under current SNCP <p>d. Effect on Garden Highway:</p> <ul style="list-style-type: none"> • perception of entering riverside residential area from I-5 would be reduced to disadvantage of Natomas Oaks, Swallows Nest, and other residential areas • elevation difference between Garden Highway and Gateway Centre could expose rooftop mechanical equipment to view • possible loss of mature trees at south end of Gateway Centre site <p>e. Effects on West El Camino Avenue:</p> <ul style="list-style-type: none"> • projects' more uniform architectural landscape could be a visual improvement over SNCP mixed-scale commercial-residential pattern <p>f. All elevated freeway interchanges would provide overviews of project rooftops and mechanical equipment</p> <p>g. Project relationship to current city design policies and concerns:</p> <ul style="list-style-type: none"> • no apparent coordination by two projects in I-5 corridor landscape treatments • Natomas Eastside preliminary plans do not detail Main Drainage Canal landscape treatments <p>h. Onsite design considerations:</p> <ul style="list-style-type: none"> • differences in building footprints between two projects, plus separating transmission line corridor, would create perception of two, or perhaps three, business park projects, rather than one integrated development | |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---------------------------------------|--|--|
| VISUAL AND OTHER DESIGN FACTORS cont. | <ul style="list-style-type: none"> • abrupt scale transitions between residential and business park components in Natomas Eastside; visual intrusion, loss of privacy, and outdoor lighting conflicts for northernmost townhouses • Natomas Eastside residential area would be isolated and may lack community identification • Natomas Oaks Dr. loop access to Natomas Eastside could create traffic and noise nuisances for nearest townhouses • proposed Natomas Eastside residential unit layout would maximize direct frontage along canal parkway to benefit of nearest units, but would create a visual barrier for other project units • many office building views would be directly onto potentially unsightly parking areas and freeways • exterior lighting impacts could result from projects | |
| NOISE | <ul style="list-style-type: none"> a. Gateway Centre buildings fronting on I-5 would be in a "Conditionally Acceptable" noise environment b. Northernmost residential units in Natomas Eastside would warrant mitigation studies under Title 25 of California Administrative Code c. Gateway Centre construction across from Natomas Oaks residential units would temporarily increase noise levels, disrupting conversation and other outdoor activities | <ul style="list-style-type: none"> a. Title 25 noise analysis (California Administrative Code, Noise Insulation Standards) required for residential portion of Natomas Eastside b. Measures to meet desirable interior noise levels (Ldn 45 dB) are listed in EIR c. Shield outdoor activities from traffic noise through building location and noise barriers d. I-5 corridor noise controls appropriate to business park structures (listed in this EIR) should be considered in lieu of a noise wall e. Construction period measures: <ul style="list-style-type: none"> • restrict construction activity to daytime weekday hours within 500 feet of Natomas Oaks residences • equipment should be properly muffled and maintained |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|-------------------------|---|--|
| ENERGY | <p>a. Project operation and related transportation energy consumption combined would be approximately 78 percent greater than SNCP development</p> <ul style="list-style-type: none"> • operations energy consumption would be about 60 percent higher than development under SNCP • annual project-related transportation energy consumption would be approximately 90 percent greater than development under SNCP <p>b. Projects would require over 40 percent more energy to construct than SNCP development</p> | <p>a. All new commercial-industrial construction must meet state's minimum energy conservation standards (Title 24, California Administrative Code)</p> <p>b. Measures beyond those mandated by Uniform Building Code and Title 24 should also be considered, including:</p> <ul style="list-style-type: none"> • preparation of project-specific, energy conservation programs, subject to review by SMUD and PG&E and approval by city • set of energy conservation criteria could be included in CC and Rs and considered in design review (suggested measures listed in this EIR) |
| VEGETATION AND WILDLIFE | <p>a. Impacts identified in SNCP EIR still applicable with projects include:</p> <ul style="list-style-type: none"> • losses of agricultural and grassland habitats • adverse changes in species population and diversity • potential removal of riparian vegetation or replacement with exotic species • potential destruction of mature trees • alterations to giant garter snake's riparian habitat • potential removal of mature trees on Gateway Centre site <p>b. Natomas Eastside lake would have potentials for impacts including:</p> <ul style="list-style-type: none"> • consumption of algicides • creation of slight nuisance and health problems related to insect vectors and waterfowl botulism | <p>a. SNCP EIR lists general mitigation measures applicable to projects, including:</p> <ul style="list-style-type: none"> • drainage canal parkway designation • preservation of riparian habitats • protection of mature trees • protection of giant garter snake habitat <p>b. Additional specific measures recommended in this EIR include:</p> <ul style="list-style-type: none"> • provision of a landscaped parkway along drainage canal frontage (Natomas Eastside) • mature tree preservation • design, operation, and maintenance measures for Natomas Eastside lake <p>c. Recommended construction period measures include recommendations for protection of snakes and mature trees</p> |
| ARCHAEOLOGY | <p>a. 1978 field reconnaissance revealed no archaeologically significant onsite cultural materials</p> <p>b. Potentials for discovery of subsurface cultural deposits during construction activities remain</p> | <p>a. Measures are listed in EIR in event subsurface cultural deposits are discovered during construction</p> |



Errata B: Traffic and Circulation

F. TRAFFIC AND CIRCULATION

r Note: Lines which have been revised based on responses to the DEIR are indicated
r below by the letter r in the margin adjacent to the change.

I. EXISTING SETTING

A general description of the physical and operational characteristics of the existing roadway network and planned roadway improvements in the vicinity of the projects is provided below. In addition, anticipated traffic conditions associated with full development under current SNCP policies are estimated and evaluated as a base case against which to compare impacts of the requested plan amendments.

a. Existing Road System

(1) Regional Access. The South Natomas area is served by an existing freeway system--both Interstate 5 and Interstate 880 provide regional access to the area. Interstate-5 is an 8-lane facility through the South Natomas area (4 lanes in each direction), and I-880 is a 6-lane facility on the northern edge of the area (3 lanes in each direction).

(2) Local Street System. The local street system is diagrammed in Figure 11. Routes available to local traffic are West El Camino Avenue, Garden Highway, and Orchard Lane. Garden Highway and West El Camino Avenue provide for east-west movement through the community as well as for access to I-5 and/or I-880. Orchard Lane serves as a connector between West El Camino Avenue and Garden Highway, and allows for north-south traffic movements within the study area. A
r new 4-lane north/south collector, Natomas Oaks Drive, has recently been partially
r completed from Garden Highway to a point approximately 600 feet south of West
r El Camino Avenue. The route will eventually connect Garden Highway with West
r El Camino Avenue. Garden Highway, West El Camino Avenue, and Orchard Lane
r are each currently 2-lanes wide.

b. Planned Roadway Improvements

(1) Base Case Assumptions. As stated in the SNCP EIR, certain minimum improvements to some of the existing roadways will be required prior to any future development within the project area. For purposes of this analysis it is assumed that the following plan-designated improvements will be completed before project operation:

- West El Camino Avenue will be a 4-vehicle/2-bike lane divided facility with additional turn pockets at the major intersections (120 ft. total right-of-way);
- Garden Highway will be a 4-vehicle-lane facility with turn pockets at major intersections (74 ft. right-of-way); and
- Orchard Lane will remain as a 2-lane facility, but with refuge provided for turning vehicles at the intersection with West El Camino Avenue.

Assumed intersection geometrics and minimum land configurations for these improvements are shown on Figure 11.

4L Existing number of lanes
 (6L) Assumed base case conditions

r : indicates revision to DEIR

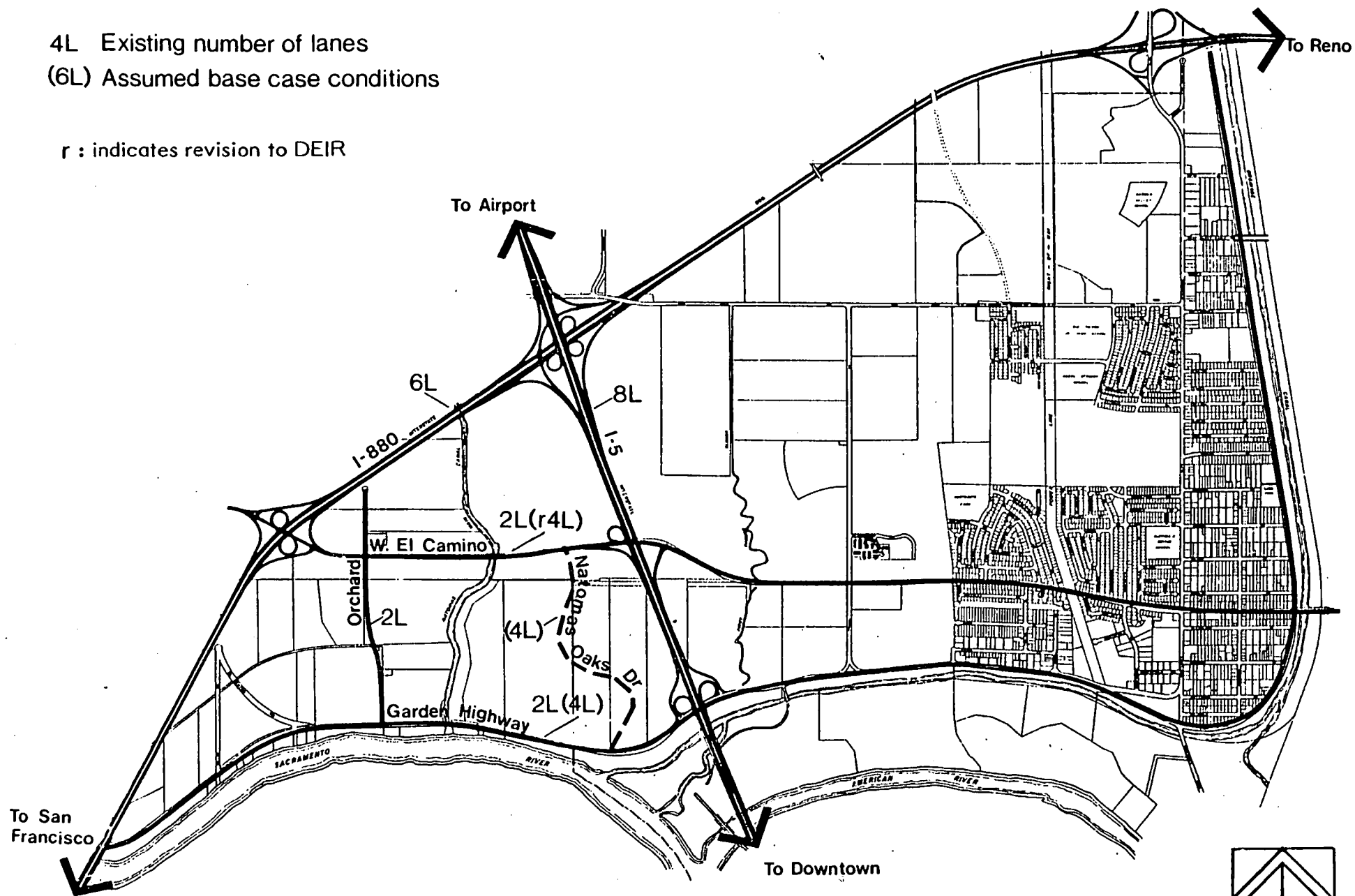
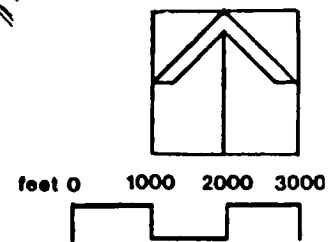


FIGURE 11
 BASE CASE ASSUMPTIONS
 EXISTING ROADWAY SYSTEM



c. Transit Service

(1) Existing Local-Serving Routes. The Sacramento Regional Transit District (SRTD) presently serves the South Natomas area through Route No. 14, which follows West El Camino Avenue between Northgate Boulevard and I-5; and I-5 between West El Camino and downtown Sacramento.

(2) Extent of Current Service. Buses on Route No. 14 operate at 30-minute headways during the morning and afternoon peak hours, and at 60-minute headways at all other hours of the day.

(3) Future Transit Use Assumptions. It has been assumed in this analysis that the ability to provide transit service will improve in future years, and that at least 6 percent of all trips generated by development in the community in 1990 would be by transit.¹ The 6 percent future transit use assumption has been used throughout this analysis.

Although SRTD service to the South Natomas area may be discontinued soon due to low ridership and loss of funding,² the effect of short-term zero percent transit service has not been considered in this traffic impact analysis since current ridership and funding problems are not applicable to future planning for 1990 and beyond. In fact, the assumption of 6 percent transit service is considered by SRTD staff to be "very conservative"² for long-range planning purposes, and suitable for this traffic impact analysis.³

d. Base Case Traffic Conditions

(1) Projected Plan Effects. Buildout based on policies set forth in the current SNCP will result in a significant increase in local traffic volumes over 1980 conditions, with an attendant decrease in "levels-of-service" at several critical nearby intersections. Estimated trip-generation characteristics of SNCP policy are shown in Table 27. An explanation of the level-of-service concept is provided in Table 26.*

Estimated trip generation characteristics of current SNCP policy are shown in Table 24, below.

* The methodology employed in this traffic analysis to determine levels-of-service impacts is described herein in Appendix A.

- r Table 24--September 1981 Errata (Supersedes Table 24, August 1981 Draft EIR)
SOUTH NATOMAS COMMUNITY PLAN AREA TRIP GENERATION AT BUILDOUT

| <u>Land Use</u> | <u>ADT</u> |
|--|--------------|
| r Residential (21,663 units) | 151,640 |
| r Commercial--neighborhood and r community (117 ac) | 53,590 |
| r Offices (35 ac) | 8,838 |
| Highway and strip commercial r (13 ac) | 11,330 |
| r Industrial (26 ac) | <u>2,000</u> |
| r TOTALS | 227,390 |

SOURCE: CH2M HILL, Wagstaff and Brady. Approximations based upon South Natomas Community Plan Land Use Map; acreage figures in the SNCP, p. 16; 1981 city staff estimates of development intensity; and Caltrans trip generation rates by land use. The chart assumes no reduction for transit use.

Estimated morning and evening peak hour SNCP build-out traffic volumes are shown in Figures 12 and 13. These figures also show the directional flow patterns which are generally oriented away from the project area during morning peak hour and toward the area during evening peak hour.

(2) Critical Intersections. A total of 6 critical intersections can be identified within the project area where the most severe traffic problems are likely to occur. They are:

- Natomas Oaks Drive at West El Camino Avenue
- I-5 Northbound Off-ramp at West El Camino Avenue
- Natomas Oaks Drive at Garden Highway
- Orchard Lane at West El Camino Avenue
- I-5 Northbound Off-ramp at Garden Highway
- I-5 Southbound Off-ramp at Garden Highway

Table 25 shows that even with the intersection improvements noted earlier, a level-of-service of "D" or worse will occur at the intersection of the I-5 southbound off-ramp and Garden Highway. The city of Sacramento in its review of new roadway designs requires an acceptable level of service (LOS) of "C."

Table 25
1978 SOUTH NATOMAS COMMUNITY PLAN BUILDOUT^a PEAK HOUR LEVELS
OF SERVICE AT CRITICAL INTERSECTIONS

| Intersection | Peak Hour Levels-of-Service ^b (percent of design capacity) | |
|--|--|---------|
| | A.M. | P.M. |
| r Natomas Oaks Drive/West El Camino | B (62%) | C (77%) |
| I-5 Northbound Off-ramp/ West El Camino | A (43%) | B (59%) |
| Natomas Oaks Drive/Garden Highway | A (43%) | A (51%) |
| Orchard/West El Camino | A (46%) | A (52%) |
| I-5 Northbound Off-ramp/ Garden Highway | A (41%) | B (56%) |
| r I-5 Southbound Off-ramp/ Garden Highway | C (72%) | D (80%) |

^aAssumes minimum set of intersection improvements defined in the South Natomas Community Plan.

^bSee Table 26 for definitions of levels-of-service.

* Revised numbers based on a changed trip assignment (per city new assumption that more traffic from Gateway Centre site would use El Camino rather than Garden Highway.

r : indicates revision to DEIR

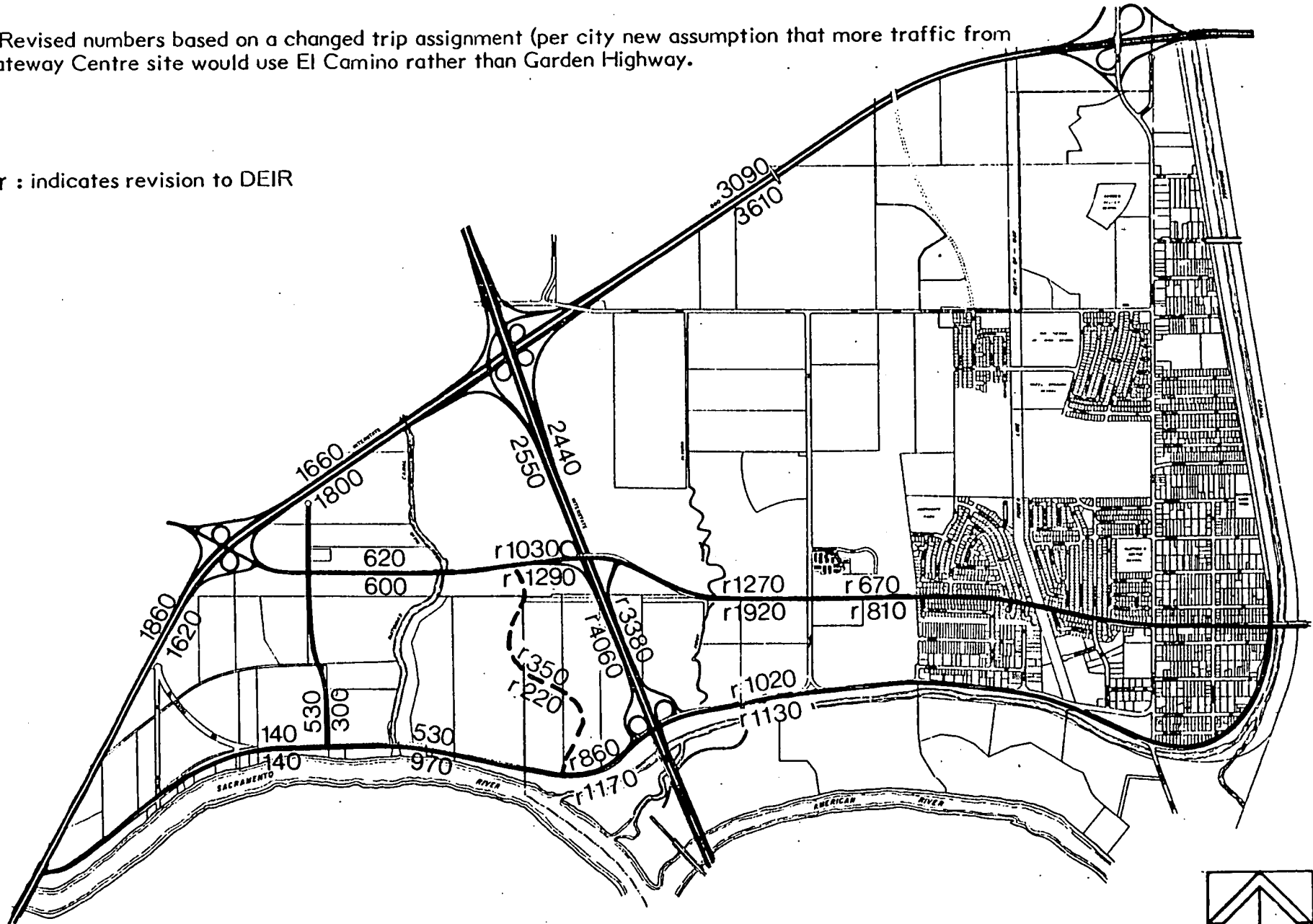
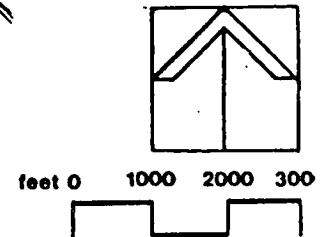


FIGURE 12
SNCP AM PEAK DIRECTIONAL TRAFFIC FLOWS*
WITHOUT PROJECTS



* Revised numbers based on a changed trip assignment (per city new assumption that more traffic from Gateway Centre site would use El Camino rather than Garden Highway.

r : indicates revision to DEIR

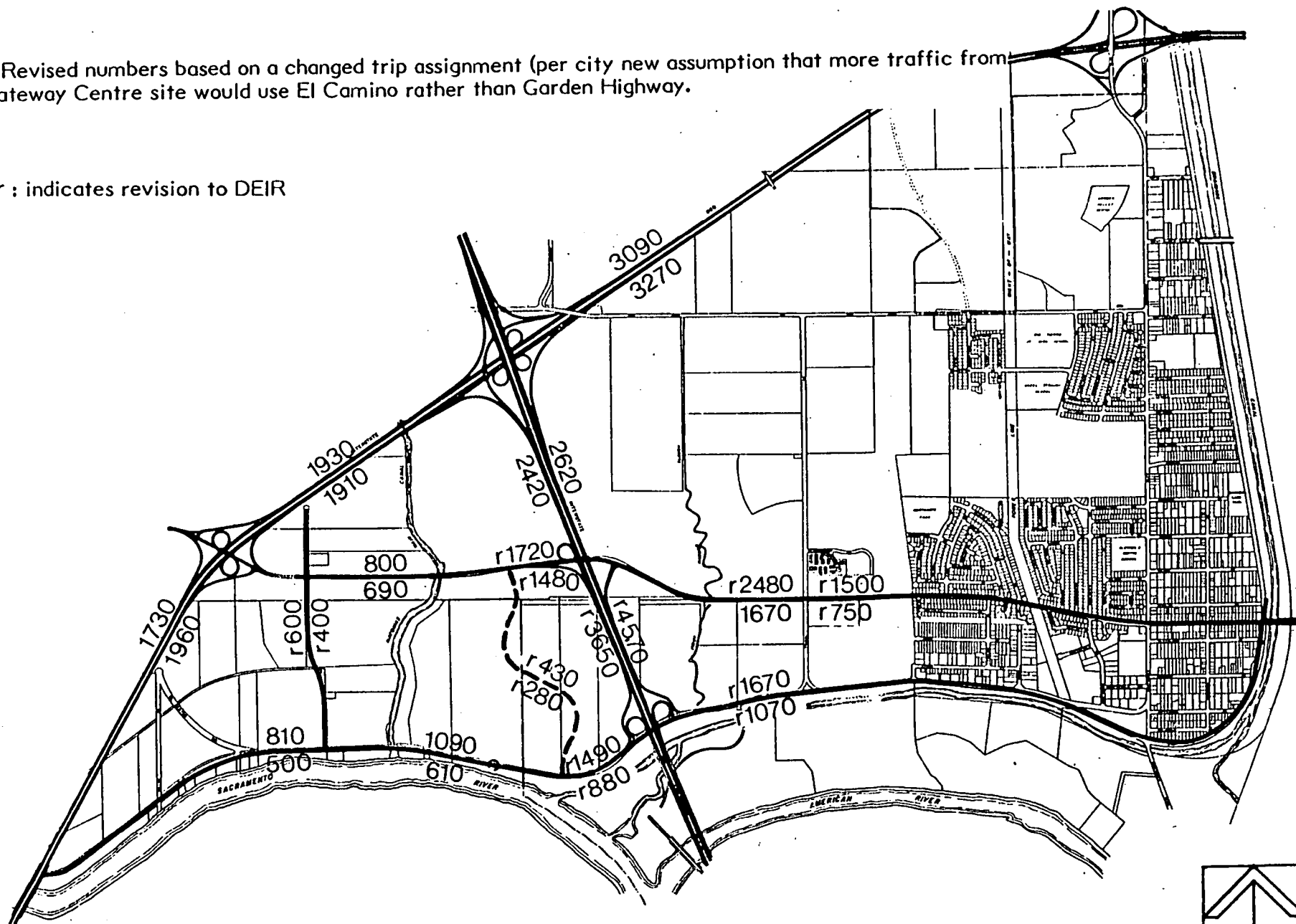


FIGURE 13
SNCP PM PEAK DIRECTIONAL TRAFFIC FLOWS*
WITHOUT PROJECTS

Table 26
LEVEL OF SERVICE DEFINITIONS

| <u>Level of Service</u> | <u>Max. Percent of Capacity Used (Saturation)</u> | <u>Traffic Flow Characteristics</u> |
|-------------------------|---|--|
| A | 55 | Average overall travel speed of 30 mph or more. Free-flowing with no congestion. No signal cycle failures. |
| B | 66 | Average overall travel speeds of 25-30 mph. Very few signal cycle failures and little or no congestion. |
| C* | 77 | Average overall travel speeds of 20-25 mph. Occasional signal cycle failures and moderate amount of congestion. |
| D | 88 | Average overall travel speed of 15-20 mph. Frequent signal cycle failures and associated congestion. |
| E | 100 | Average overall travel speed of 15-20 mph. Unstable flow, including almost continuous signal cycle failures and backups on approaches to the intersections. Represents the theoretical capacity of the facility. |
| F | +100 | Jammed conditions, with average overall travel speed of below 15 mph. Continuous signal cycle failure with backup on approaches going through upstream intersections in some cases. |

*Note: The city of Sacramento in its design of new roadways requires an acceptable LOS of C.

PROJECT IMPACTS

The methodology and assumptions used in determining project-related traffic impacts are discussed in Appendix A.

a. Changes in Trip Generation

Average 24-hour and P.M. peak trip generation comparisons for the South Natomas community with and without the proposed projects are shown in Table 27.

(1) Project Effects. Project site traffic generation characteristics with and without the business parks are shown in Appendix A, Table A2. Buildout under current SNCP land use designations would result in roughly 32,500 average daily trips from the sites alone (typical weekday); approximately 3,350 of those would occur in P.M. peak hour. Buildout of the two sites with the proposed business parks would result in around 74,600 average daily trips (more than double the current plan figure) and roughly 7,300 P.M. peak hour trips. The increment of roughly 42,125 trips due to the projects represents roughly a 130 percent increase over trip generation levels anticipated from the SNCP.

As shown on Table 27, the Gateway Centre project would account for about 36 percent of the net traffic increase, and Natomas Eastside would account for 64 percent.

The most noticeable localized trip generation effects would be a 230 percent increase in P.M. peak hour outbound traffic from the Natomas Eastside and Gateway Centre sites combined, and a 25 percent increase in P.M. peak hour inbound traffic to the sites.

b. Local Analysis

(1) Traffic Volumes. Traffic volumes on many of the routes within the vicinity are would be substantially higher under the proposed project than under the SNCP according to projections in this analysis. The primary reason for the increased traffic is the replacement of residential land uses with commercial and business office uses which are higher trip generators.

Estimated A.M. and P.M. peak hour traffic volumes from the proposed projects are shown in Figures 14 and 15. These figures also show a directional flow pattern which is reversed from that under the SNCP. Traffic is attracted to the project area during the morning peak hour and away from the site during evening peak hour.

(2) Level-of-Service Comparisons. A comparison of A.M. and P.M. peak hour levels-of-service effects expected from the SNCP-generated traffic with and without the proposed projects for the 6 potentially critical intersections in the area is shown in Table 28 and Figure 16.

It is evident that the proposed project traffic would result in levels-of-service in the local traffic network which are significantly lower than levels resulting from SNCP policies now in effect. The following specific effects could be anticipated with construction of the projects by 1990:

Table 27--Sept. 1981 Errata (Supersedes Table 27 in Aug. 1981 Draft EIR)
SOUTH NATOMAS COMMUNITY TRAFFIC GENERATION WITH AND WITHOUT THE PROJECTS

| Land Use Type | Average Daily Trip (ADT) Rate ^b | Without the Projects | | | | Changes Due to Projects | | | | Total SNCP Area | |
|--------------------------------|--|---------------------------|---------|-------------------------|-----------|-------------------------|-----------------|-----------------------|----------------|-----------------|-----------------|
| | | Total SNCP Area | | (Project Sites) | | Natomas Eastside (Only) | | Gateway Center (Only) | | Total SNCP Area | |
| | | Land Use | ADT | Land Use | ADT | Land Use | ADT | Land Use | ADT | Land Use | ADT |
| Residential | | | | | | | | | | | |
| 11 units/ave. ac. ^a | 7/unit | 21,663 units ^c | 151,640 | (-2,255) ^d | (-15,785) | 0 | 0 | 0 | 0 | 19,408 | 135,860 |
| 22 units/ave. ac. | 6/unit | | | | | +468 units | +2,810 | 0 | 0 | 468 | 2,810 |
| Offices | 15/1000 s.f. | 589,200 s.f. ^f | 8,838 | (-320,000) ^g | (-4,800) | +1,900,000 s.f. | +28,500 | +1,450,000 s.f. | +21,750 | 3,619,200 | 54,290 |
| Support Commercial | 70/1000 s.f. | 765,530 ^h | 53,590 | (-170,120) ⁱ | (11,910) | +233,000 s.f. | +16,310 | +75,000 s.f. | +5,250 | 903,400 | 63,240 |
| Highway Commercial | 75/1000 s.f. | 151,000 ^j | 11,330 | (0) | (0) | 0 | 0 | 0 | 0 | 151,000 | 11,330 |
| Industrial | 77 trips/acre | 26 ac. | 2,000 | (0) | (0) | 0 | 0 | 0 | 0 | 26 ac. | 2,000 |
| TOTALS | | | 227,393 | | (-32,495) | | +47,620 (+11.8) | | +27,000 (+6.7) | | 269,520 (+18.5) |
| Percent Change | | | | | | | | | | | |

SOURCE: CH2M Hill/Wagstaff and Brady.

^aSNCP densities range from 7 to 23 units/acre; assumed average density = 11 units/acre.

^bFrom Table A1, Appendix, p. G-3.

^cFrom March 1981 City Planning Department inventories and updated projections for SNCP.

^dFrom Table 6, p. D-12.

^eFrom Table 3, p. B-8.

^fAssumes same office square feet/acre rate as proposed with projects; i.e. 3.35 million s.f./199 gross acres = 16,834 s.f./gross ac.; 35 gross acres of office (from Table 57) x 16,834 s.f./gross ac. = 589,200 s.f.

^g19 gross acres of office x 16,834 s.f./gross acre = 320,000 s.f.

^hFrom Table 1.

ⁱAssumes same comm'l s.f./acre rate as proposed with projects;

i.e. 307,500 s.f./47 gross acres = 6,543 s.f./gross ac.; 117 gross acres of comm'l (from Table 57) x 6,543 s.f./gross ac. = 765,530.

^j26 gross acres of comm'l (Table 59) x 6,543 s.f./gross ac. = 170,120 s.f.

- A totally unacceptable A.M./P.M. LOS "F/F" at the intersections of Natomas Oaks Drive/West El Camino and the I-5 Southbound offramp/Garden Highway that would not occur under the SNCP.
- An unacceptable A.M./P.M. LOS "F/C" at the I-5 northbound off-ramp/West El Camino intersection as compared to a congestion-free "A/B" under the SNCP.
- An unacceptable A.M./P.M. LOS "A/F" at the Natomas Oaks Drive/Garden Highway intersection, as compared to a free-flowing LOS "A/A" under the SNCP.
- A decrease in LOS at remaining critical intersections, but to levels which would still be acceptable ("C" or above).

Table 28
SOUTH NATOMAS COMMUNITY PLAN VERSUS PROPOSED PROJECT PEAK
HOUR LEVELS OF SERVICE AT CRITICAL INTERSECTIONS^a

| Intersection | Peak Hour Levels of Service ^b | | | |
|--|--|---------|----------|----------|
| | Community Plan | | Proposed | Project |
| | A.M. | P.M. | A.M. | P.M. |
| Natomas Oaks Dr./West El Camino | B (62%) | C (77%) | F (119%) | F (142%) |
| I-5 Northbound Off-Ramp/ West El Camino | A (43%) | B (59%) | F (115%) | C (73%) |
| Natomas Oaks Dr./Garden Highway | A (43%) | A (51%) | A (49%) | F (104%) |
| Orchard/West El Camino | A (46%) | A (52%) | B (58%) | C (67%) |
| I-5 Northbound Off-ramp/ Garden Highway | A (48%) | B (56%) | B (65%) | C (73%) |
| I-5 Southbound Off-ramp/ Garden Highway | C (72%) | D (80%) | F (126%) | F (122%) |

SOURCE: CH2M HILL

^aAssumes minimum set of intersection improvements defined in the SNCP.

^bSee Table 25 for a definition of Levels-of-Service.

c. Regional Analysis

(1) Trip Distribution Assumptions. The assignment of project-related trips to internal collectors, arterial streets, and freeways was based on typical trip distribution patterns for the Sacramento area. It was estimated in the POPULATION, HOUSING, AND EMPLOYMENT section of this report that approximately 30 percent of project employees would live in the South Natomas area; from this amount it was assumed that approximately 10 percent of all home-to-work trips would occur within the study area (referred to as "internal" trips). The remaining commute trips (90 percent) would be attracted to and from areas external to the study area. Assumed trip distribution patterns and average miles travelled (AMT) are shown in Table 29. The directional orientation of the distribution patterns did not change between the SNCP and the proposed project.

* Revised numbers based on a changed trip assignment (per city new assumption that more traffic from Gateway Centre site would use El Camino rather than Garden Highway.

r: indicates revision to DEIR

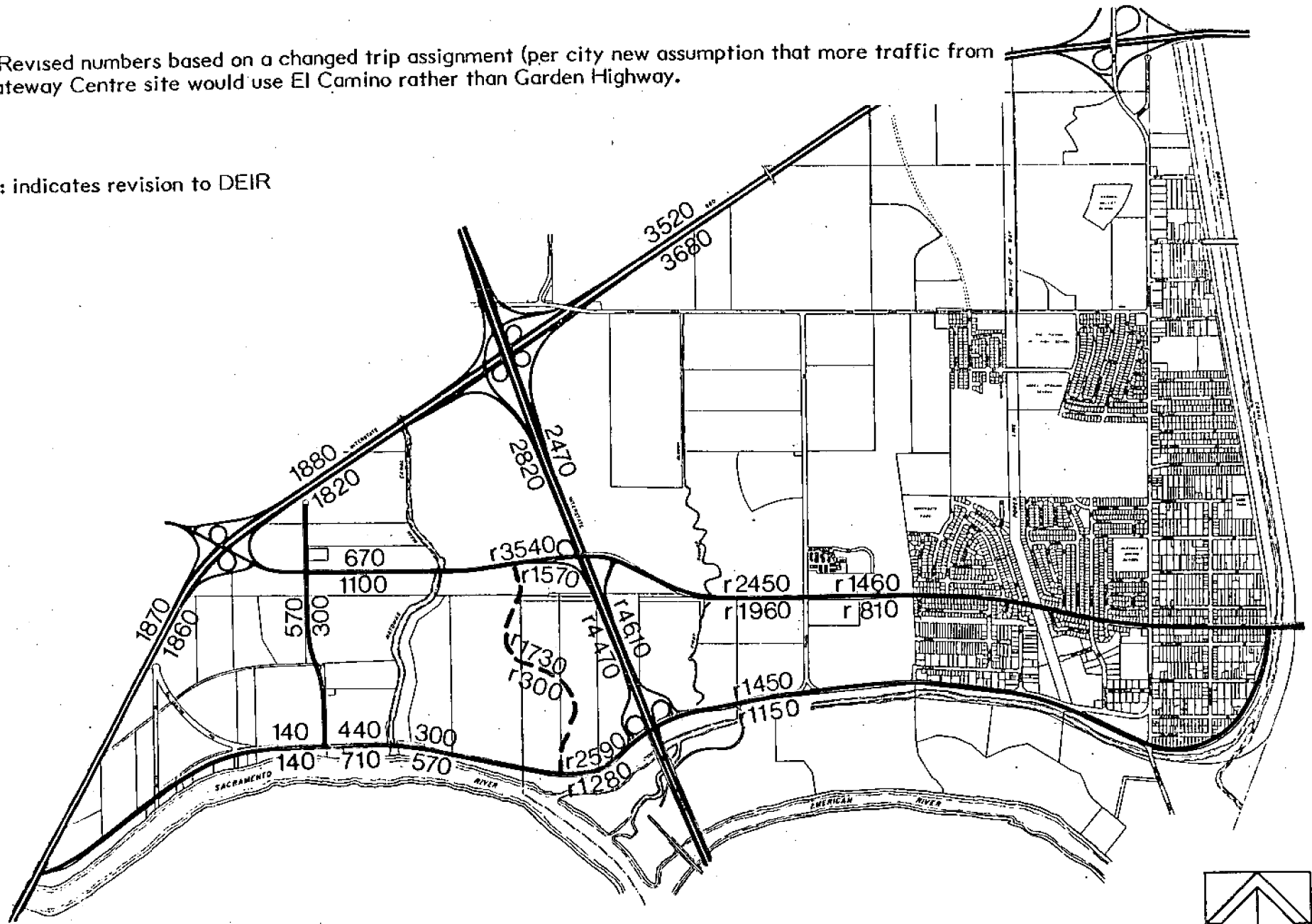
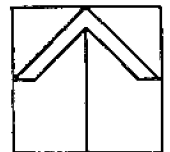


FIGURE 14
SNCP AM PEAK HOUR DIRECTIONAL FLOW
WITH PROJECTS



feet 0 1000 2000 3000



* Revised numbers based on a changed trip assignment (per city new assumption that more traffic from Gateway Centre site would use El Camino rather than Garden Highway.

r : indicates revision to DEIR

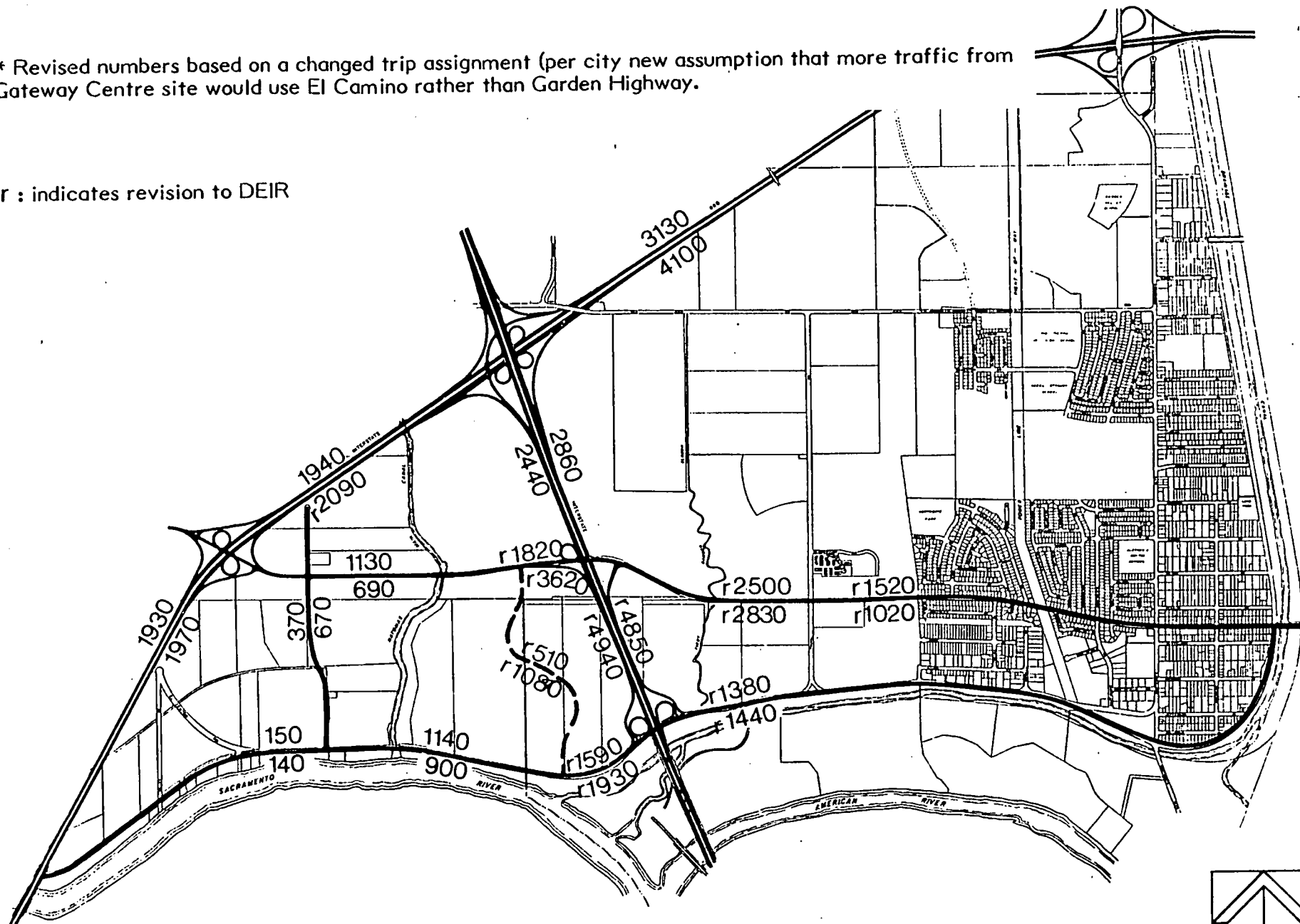
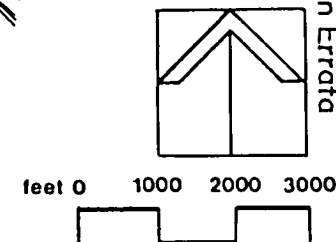


FIGURE 15
SNCP PM PEAK HOUR DIRECTIONAL FLOW*
WITH PROJECTS



* Peak Hour Level of Service
(worst AM or PM time period shown)

A/B L.O.S. with projects
L.O.S. without projects

r : indicates revision to DEIR

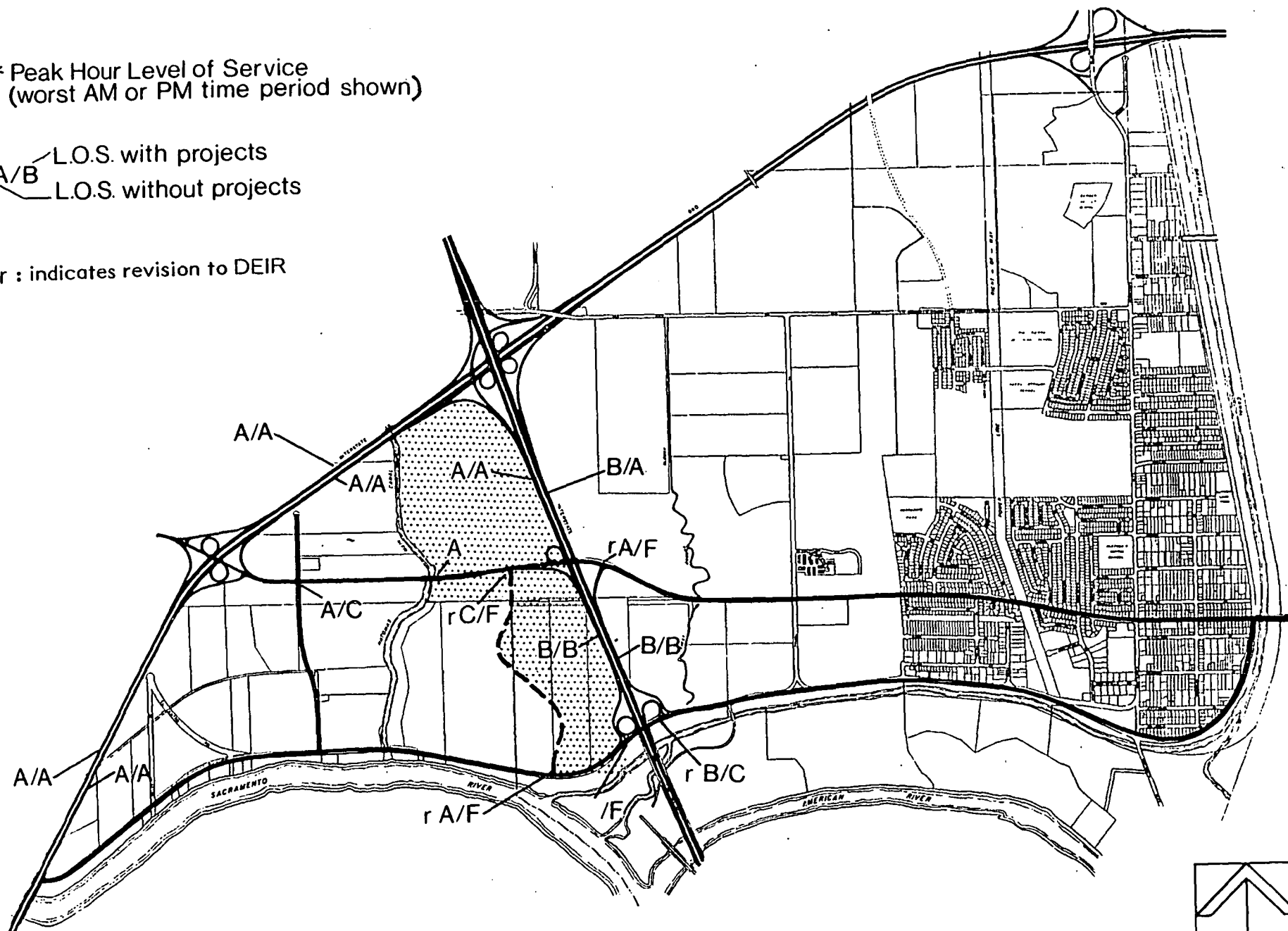


FIGURE 16
IMPACT COMPARISON-- PEAK HOUR L.O.S.*
SCNP BUILDOUT WITH AND WITHOUT PROJECTS

(2) Levels-of-Service Effects. The incremental impacts of the proposed projects on regional traffic flow patterns are not nearly as constraining as they would be at the local level. The additional traffic increment generated by the project in comparison to SNCP buildout effects would represent an insignificant percentage of total traffic volumes in the regional network. Consequently, the levels of service on roadways outside of the project area are not expected to be lowered as a result of this project.

(3) Peak Flow Direction. The direction of peak flow on facilities serving regional traffic demands (such as I-5 and I-880) would also not change significantly between SNCP buildout scenarios with and without the proposed projects.

(4) Vehicle Miles Travelled. As shown on Table 27, vehicle miles travelled (VMT) have been calculated by multiplying the average miles travelled in each direction by the percent of average daily trips. Data in Table 30 indicate that the proposed projects would increase site-generated vehicle miles travelled by 130 percent.

Table 29
TRIP DISTRIBUTION PATTERNS

| <u>Trip Distribution by Direction</u> | <u>Average Miles Travelled</u> | <u>Proportion of Trips Attracted to Project Site</u> |
|---|------------------------------------|--|
| West (I-880) | 15 | 5% |
| South/Southeast (I-5) | 9 | 45% |
| East (Northgate, etc.) | 6 | 15% |
| North/Northeast (I-5, Northgate, etc.) | 11 | 25% |
| Internal | 2 | <u>10%</u> |
| TOTAL | | 100% |

SOURCE: CH2M HILL

Table 30
COMPARISON OF SITE GENERATED SOUTH NATOMAS COMMUNITY PLAN
AND PROPOSED PROJECT VMT

| Trip Distribution by Direction | Project-Site-Generated Vehicle Miles Travelled | |
|-----------------------------------|---|------------------------|
| | SNCP | Project |
| r West | 24,370 | 56,000 |
| r S/SE | 134,080 | 307,900 |
| r East | 29,240 | 67,150 |
| r North/NE | 89,350 | 205,200 |
| r Internal | 6,500 | 14,900 |
| r TOTALS | 283,540 | 651,150 (+130% change) |

SOURCE: CH2M HILL

Assumptions:

- r • 0% transit service
- All traffic going south would use either I-5 or Northgate;
- All traffic going west would use I-880; and
- All traffic going east and northeast would use I-880 and El Camino.

3. MITIGATION MEASURES

Obviously, a basic impact mitigation measure would be to change the land use characteristics of the two projects to an alternative which would increase projected service at surrounding intersections to levels similar to or better than those projected with current SNCP buildout. Of the six project alternatives suggested by city staff and evaluated in this report (see ALTERNATIVES section), one--the "North Natomas" scheme--would result in a significantly reduced traffic impact. The North Natomas alternative would retain current SNCP land use policies for the project sites while accommodating 3.35 million square feet of commercial office on a site near the I-5/Del Paso Road intersection in North Natomas.

The measures below are recommended for consideration as steps necessary to mitigate traffic impacts of the proposed land use changes (Natomas Eastside and Gateway Centre projects). Before requiring any of the following improvements, an investigation of the physical constraints and economic feasibility of each should be considered. (Such an investigation is beyond the scope of this report.)

a. Natomas Oaks Drive/West El Camino Avenue Intersection Improvements. Provide: three through-lanes in each direction on West El Camino; separate lanes for all turn movements on all approaches; dual left-turn lanes on all but the west approach; two through-lanes on the south approach and one on the north approach. These improvements would result in an LOS improvement to "C/D" during the critical P.M. peak hour, with the projects.

b. I-5 Northbound Off-Ramp/West El Camino Avenue Interchange Improvements. Provide three left-turn lanes from off-ramp onto West El Camino and a fourth through-lane in the westbound direction on West El Camino. These improvements would result in an LOS improvement to C during the critical morning peak hour, with the projects.

c. Natomas Oaks Drive/Garden Highway Intersection Improvements. Provide a separate right-turn lane and three left-turn lanes on the north approach, three through-lanes in each direction on Garden Highway, and separate turn pockets on Garden Highway. These improvements would result in a LOS improvement to C during the critical evening peak hour, with the projects.

d. I-5 Southbound Off-Ramp/Garden Highway Intersection. The unacceptable level-of-service (LOS F) with the projects during P.M. peak hour would require major capital expenditures such as construction of a free right turn for Garden Highway eastbound to join I-5 southbound movements. Improvements to this intersection are not likely to be included in capital expenditure plans for the near future.

e. Comprehensive South Natomas Capital Improvements Program. Due to the major offsite roadway improvements that would be required to accommodate the proposed project, it would be appropriate that the city undertake a comprehensive program to define community circulation needs, and in response to those needs, develop a phased capital improvements plan. This plan should include an outline and priorities for specific improvements necessary to accommodate incremental increases in traffic flows generated by new development in the area.

Financing for development and implementation of the capital improvements plan could be obtained through an equitable scheme, whereby project sponsors would contribute to some degree determined by the city on the bases of project size, location, and traffic-generation capabilities.

Design features of such a plan should include mitigation measures listed above. Because specific improvements would, in effect, be individual projects, mitigation measures for the construction and growth-inducing impacts of these projects should be considered during the development of the plan.

f. Flex-Time or Shortened Work Weeks. The city should require that the project developers promote among future tenants a flex-time program, where employees may choose their arrivals between set times, such as 7:00 and 9:00 a.m., or shortened work weeks (four, 10-hour days staggered throughout the week). Both are potentially effective measures to reduce standard peak-hour traffic levels. By spreading out peak outbound and inbound periods over several hours, levels of congestion at impacted intersections could be improved.

Office firms have proven to be more suited to flex-time and adjusted work weeks than are industrial and commercial uses.⁴ For the proposed projects, office uses would account for over 50 percent of peak hour outbound and inbound trips (see Table 27). Rescheduling of these trips over a period of several hours (e.g. 3 to 6 p.m.) could result in as much as a 50-60 percent reduction in office peak hour trips, or in the case of the projects, as much as a 25 to 30 percent reduction in total peak hour trips. Such trip reductions would improve peak hour levels-of-service at critical

nearby intersections. The real effectiveness of such programs would be dependent upon the participation rate of project tenants, and the spacing of trips by those participants.

(Note. Establishment of a van-pooling program would not be an effective measure for reducing project traffic generation in this case. Van-pooling works best for long home-to-work trips where trip origins and destinations are concentrated in small areas, desired arrival times are clustered within a short-time period, and private automobile travel faces such disincentives as severe peak-hour congestion and parking difficulties. Experience shows that van-pools are most successful when sponsored by single companies with large numbers of employees--generally 500 or more--in one location.⁵ For these reasons, it seems unlikely that van-pooling at the proposed South Natomas business parks would effectively supplement conventional public transit service or significantly reduce vehicular trips.)

4. REFERENCES

a. Footnotes

¹CH2M HILL/Wagstaff and Brady work session with city staff (Carstens, Bloodgood, Parker), April 8, 1981.

²Michael Wiley, SRTD, July 24, 1981.

³Ibid.

⁴Engineering News Record, "Flexible Hours Little Used." August 16, 1981.

⁵Urban Mass Transportation Administration, Para-Transit, A Summary Assessment of Experience and Potential, June 1979.

b. General

Caltrans, Trip Generation Study, 9th Progress Report, 1975.

Highway Research Board. Highway Capacity Manual. Special Report 87, 1965.

Transportation Research Board, Interim Materials on Highway Capacity. Transportation Research Circular 212, 1980.

JHK & Associates General Traffic Impact Assessment of Gateway Centre (1981).

APPENDIX G. TRAFFIC ANALYSIS METHODOLOGY

Table A2 (Appendix G—5) in the August 1981 DEIR summarizing the traffic generation characteristics of the South Natomas community with and without the Natomas Eastside and Gateway Center projects is in error. The DEIR Table A2 is hereby superseded by the table below:

Table A2--September 1981 Erratum (Supersedes Table A2 in August 1981 Draft EIR)

PROJECT SITE TRAFFIC GENERATION AT BUILDOUT WITH AND WITHOUT THE PROPOSED PROJECTS

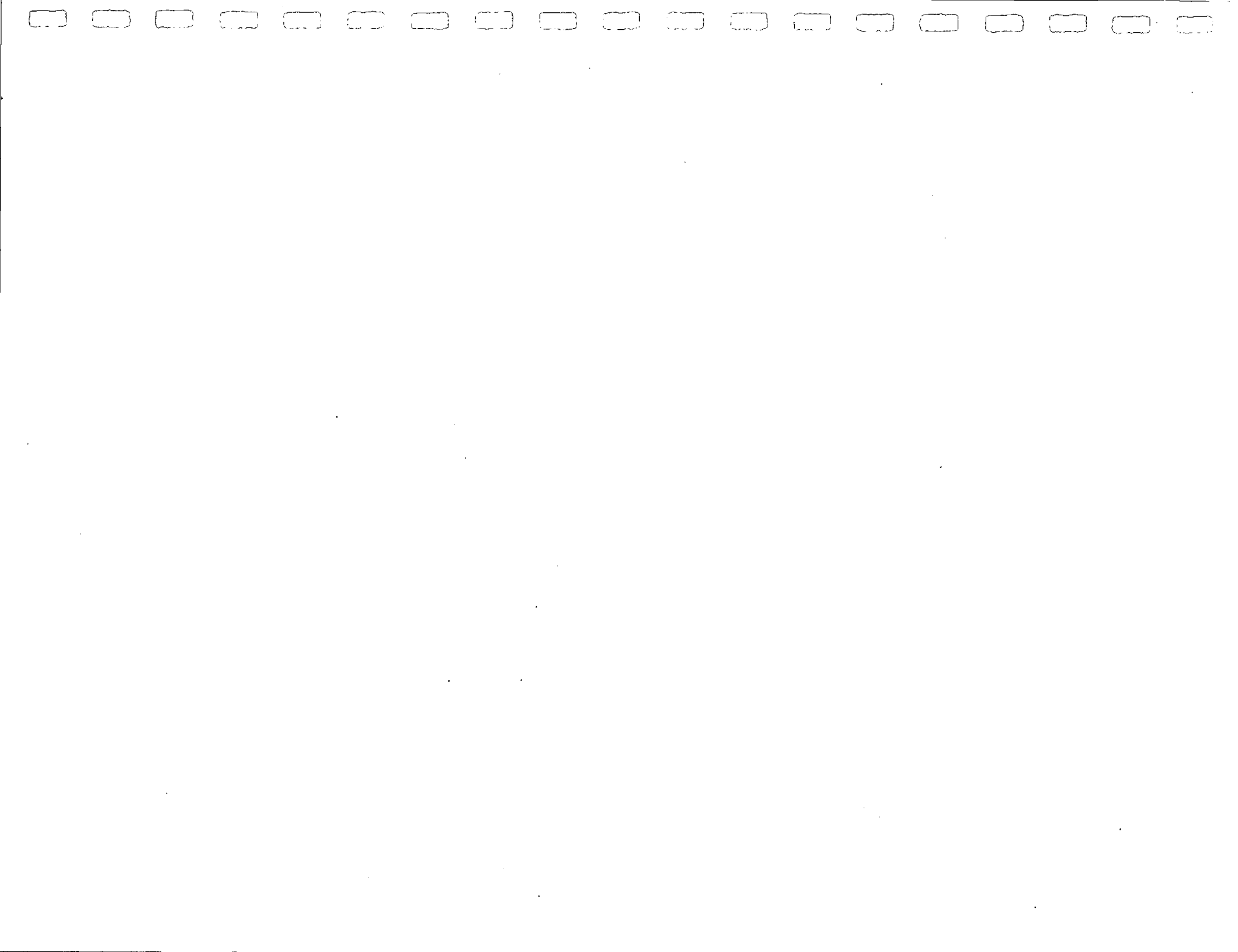
| Land Use Type | Average Daily Trip Rate | Average Project Site Daily Trips (ADT) | | | PM Project Site Peak Hour Trips | | | | | |
|----------------|-------------------------|--|---------------------|------------------------|---------------------------------|----------------------------|--------------------------|---------------------------|--------------------------------|---------------------------------|
| | | Total w/o Projects | Total w/ Projects | Change Due to Projects | SNCP w/o Projects Inbound | SNCP w/o Projects Outbound | SNCP w/ Projects Inbound | SNCP w/ Projects Outbound | Change Due to Projects Inbound | Change Due to Projects Outbound |
| Residential | | | | | | | | | | |
| 11 units/ac | 7/unit | 15,785 ^a | 0 | -- | -- | -- | -- | -- | -- | -- |
| 22 units/ac | 6/unit | 0 | 2,810 ^a | -- | -- | -- | -- | -- | -- | -- |
| Subtotal | | 15,785 | 2,810 | -12,980 | 1,126 | 648 | 199 | 121 | -927 | -527 |
| Office | 15/1000 s.f. | 4,800 ^a | 50,250 ^b | +45,450 ^c | 607 | 485 | 1,077 | 862 | +470 | +377 |
| Commercial | 70/1000 s.f. | 11,910 | 21,560 | +9,652 | 96 | 384 | 1,005 | 4,020 | +909 | +3,636 |
| TOTALS | | 32,495 | 74,620 ^d | +42,125 | 1,829 | 1,517 | 2,281 | 5,003 | +452 | +3,486 |
| Percent Change | | | | (+130) | | | | | (+25) | (+230) |

SOURCE: CH2M Hill, Wagstaff and Brady.

^aFrom Table 27--Sept. 1981 Erratum. ^bTotal w/o projects plus change due to projects = total w/ projects; i.e., 4,800 + 45,450 = 50,250.

^cTotal SNCP area ADT w/ projects minus same w/o projects = project increase; 54,288 (Table 27) - 8,840 (Table 27) = 45,450.

^dContributions by individual projects are as follows: 64 percent (47,620 ADT) from Natomas Eastside; and 36 percent (27,000 ADT) from Gateway Centre.



Errata C: Air Resources

K. AIR RESOURCES

- r Note: Lines which have been revised based on responses to the DEIR are indicated
r below by the letter r in the margin adjacent to the change.

I. EXISTING SETTING

a. Air Quality Controls in Effect

In 1977, the U.S. Environmental Protection Agency (EPA), under the authority of the 1977 Clean Air Act Amendments, designated the Sacramento Air Quality Maintenance Area (AQMA) as a non-attainment area for ozone and carbon monoxide. In response, the Sacramento Regional Area Planning Commission (now named the Sacramento Area Council of Governments --SACOG) prepared an Air Quality Plan which outlines control strategies to attain pollutant standards by 1987.¹

Ambient air quality standards established by EPA and the California Air Resources Board are shown on Table 42. These standards represent the levels of air quality that must be achieved to protect public health and welfare in the Sacramento Valley airshed.

b. Regional Conditions

Air pollution levels in the Sacramento area have increased significantly within the last several years due to recent rapid growth in combination with a localized air inversion problem.

Air quality is measured in Sacramento on a continual basis by the County Air Pollution Control District and the California Air Resources Board. The monitoring indicates that the Sacramento AQMA exceeds federal standards for ozone and carbon monoxide, while total suspended particulate (TSP) levels exceed both state and secondary federal standards.

(1) Ozone. In 1978, ozone levels at the downtown Sacramento air monitoring station (closest monitoring station to the site) exceeded the federal standard on 6 different days. At an east Sacramento station (closer to the foothills) the ozone standards were exceeded on 15 days. The worst conditions were recorded in the eastern foothills at Folsom, where 23 ozone violation days were recorded.

The air quality problem at Folsom is typical of the foothills east of Sacramento. The area is heavily influenced by prevailing southwesterly winds which transport ozone and its precursors (hydrocarbons and nitrogen oxides) from urban Sacramento to the east.

(2) Carbon Monoxide. Carbon monoxide levels exceeded the federal standard of 9 ppm (8-hour average) on eight days in the 1978 at the east Sacramento station; no violations were recorded at the downtown or Folsom stations.²

Table 42
AMBIENT AIR QUALITY STANDARDS

| Pollutant | Time Averaging | California ^a Standards | National Standard ^b | |
|------------------------------------|--------------------------|--------------------------------------|--------------------------------|-------------------------|
| | | | Primary ^c | Secondary ^d |
| Ozone | 1 hour | 200 ug/m ³ | 240 ug/m ³ | Same as Primary Std. |
| Carbon Monoxide | 12 hour | 10 ppm | -- | Same as Primary Std. |
| | 8 hour | -- | 9 ppm | |
| | 1 hour | 40 ppm | 35 ppm | |
| Nitrogen Dioxide | Annual Average | -- | 0.05ppm | Same as Primary Std. |
| | 1 hour | 0.25ppm | -- | |
| Sulfur Dioxide | Annual Average | -- | 0.03ppm | -- |
| | 24 hour | 0.04ppm | 0.14ppm | -- |
| | 3 hour | -- | -- | .05 ppm |
| Suspended Particulate Matter | Annual Geometric mean | 60 ug/m ³ | 75 ug/m ³ | 60 ug/m ³ |
| | 24 hour | 100 ug/m ³ | 260 ug/m ³ | 150 ug/m ³ |
| Hydrocarbons | 3 hour | -- | 160 ug/m ³ | Same as Primary Std. |
| Lead | 30 day average | 1.5 ug/m ³ | -- | -- |

SOURCE: CH2M HILL.

^aCalifornia standards are values that are not to be equaled or exceeded.

^bNational standards, other than those based on annual averages or annual geometric means, are not to be exceeded more than once per year.

^cNational Primary Standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Each state must attain the primary standards no later than 3 years after the state implementation plan is approved by the Environmental Protection Agency.

^dNational Secondary Standards are the levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. Each state must attain the secondary standards within "a reasonable time" after the state implementation plan is approved by the EPA.

c. Contribution of Development under the South Natomas Community Plan to Air Pollution

An air quality analysis was conducted on both a micro- and regional scale for SNCP buildout. The microscale analysis involved the use of a computerized air quality model, CALINE 3. CALINE 3 is a line source dispersion model developed by Caltrans to estimate carbon monoxide (CO) pollutant levels adjacent to highways and arterial streets.³

The regional-scale analysis consisted of estimating the gross daily emissions for all pollutants that would occur from vehicle trips generated in the study area. The following analysis assumed complete development of the site by either 1990 or the year 2000.

(1) Model Assumptions and Input. Worst case meteorological and traffic conditions were assumed for model input. A wind speed of one meter per second and very stable atmospheric conditions (Class F) were assumed for the analysis. Generally maximum CO levels occur at the roadway edge when the prevailing wind direction is parallel to the roadway. Because of the high traffic levels on El Camino Avenue and corresponding low speeds during the peak hour, it is believed that peak CO levels would occur when the wind is parallel to El Camino Avenue; thus, a westerly wind (270°) was applied.

Peak hour traffic levels appropriate for each roadway segment under the South Natomas development scenario without the projects were included in the input data. El Camino Avenue, Garden Highway, and Northgate Road were all assumed to be operating at Level of Service "F", as determined in the TRAFFIC AND CIRCULATION section of this report, with an average vehicle speed of 10 mph. I-880 and I-5 would not be as congested; the average vehicle on these routes was assumed to be travelling at a speed of 45 mph during peak hour.

Table 43 provides a summary of the physical and operational characteristics of the relevant roadways with development under the adopted SNCP. Composite emission factors for 1990 and 2000 corresponding to the above vehicle speeds were derived from the Caltrans EMFAC 6C (July 1981) model.

(2) Microscale Analysis. Table 43 lists peak CO levels projected for various local receptors shown on Figure 18 in both 1990 and 2000. Carbon monoxide levels are estimated at the edge of the right-of-way; included in the estimate is a 2.0 parts per million (ppm) background level, which would occur with or without SNCP buildout. The maximum predicted CO level is 17.2 ppm and occurs at a receptor located near the intersection of El Camino Avenue and Truxel Road.

It is apparent that the one-hour federal CO standard of 35 ppm or California standard of 40 ppm would not be exceeded in the study area during the next 20 years under the current SNCP.

(3) Regional Analysis. Estimates of daily gross regional emissions are based primarily on the number of vehicle trips generated by development under the adopted SNCP and on the average distance travelled by employees and residents in work-to-home trips.

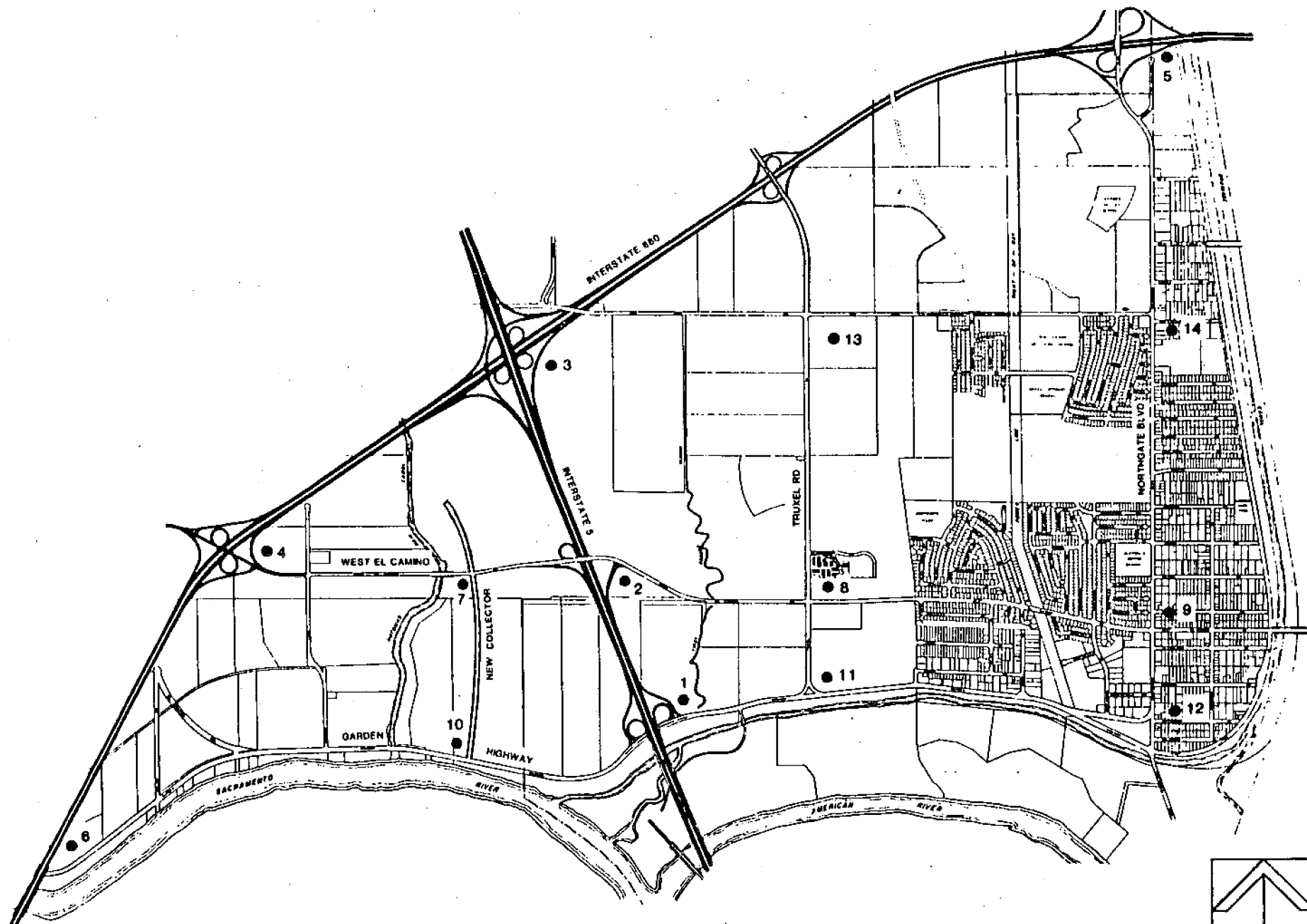


FIGURE 18.
CARBON MONOXIDE RECEPTOR LOCATIONS

Table 43
PREDICTED CARBON MONOXIDE LEVELS FOR ADOPTED SNCP

| | <u>Receptor</u> | <u>Location</u> | <u>Peak 1-Hour Concentration (ppm) at Edge of Roadway^{a,b}</u> | |
|---|-----------------|--------------------------------|---|-------------|
| | | | <u>1990</u> | <u>2000</u> |
| r | 1 | I-5 at Garden Hwy | 5.4 | 4.5 |
| r | 2 | I-5 at El Camino | 8.7 | 7.1 |
| r | 3 | I-5 at I-880 | 4.5 | 3.8 |
| r | 4 | I-880 at El Camino | 3.6 | 3.1 |
| r | 5 | I-880 at Northgate | 7.5 | 6.0 |
| r | 6 | I-880 at Garden Hwy | 2.7 | 2.4 |
| r | 7 | El Camino at Natomas Oaks Dr. | 6.8 | 5.6 |
| r | 8 | El Camino at Truxel | 17.2 | 13.8 |
| r | 9 | El Camino at Northgate | 13.2 | 10.7 |
| r | 10 | Garden Hwy at Natomas Oaks Dr. | 5.2 | 4.4 |
| r | 11 | Garden Hwy at Truxel | 3.0 | 2.7 |
| r | 12 | Garden Hwy at Northgate | 15.8 | 13.0 |
| r | 13 | Truxel at San Juan | 2.9 | 2.6 |
| r | 14 | Northgate at San Juan | 6.7 | 5.6 |

SOURCE: CH2M HILL.

- r ^aCalculated using updated EMFAC 6C emission factors.
r ^bA 2 parts per million (ppm) CO background level was added to all predicted
r concentrations. Federal 1-hour standard for CO is 35 ppm.
^cSee Figure 18 for receptor locations.

- r An estimated 6,500 internal vehicle miles travelled (VMT) and 277,000 external
r VMT (for a total of 283,500 VMT) would be generated by the project site under the
r SNCP (see Table 30, p. F-16). The total gross contribution of pollutants emitted
into the Sacramento Valley airshed by SNCP development-generated trips is shown
on Table 44. (Composite emission factors were again derived from
r EMFAC 6C assuming an average vehicle speed of 35 mph⁴ for external trips and
20 mph for internal trips.)

Table 44

r PREDICTED GROSS EMISSIONS FROM PROJECT SITES UNDER SOUTH NATOMAS
COMMUNITY PLAN

| <u>Pollutants</u> | <u>Daily Gross Emissions^a 1990 (tons/day)</u> |
|--------------------------------------|--|
| r Carbon Monoxides (CO) | 4.8 |
| r Nitrogen Oxides (NO _x) | 0.6 |
| r Total Hydrocarbons (THC) | 0.4 |
| r Sulfur Dioxide (SO ₂) | 0.075 |
| r Particulates (TSP) | 0.1 |

SOURCE: CH2M HILL.

- r ^aSample calculation: VMT x Emission Factor = Total Emissions; calculations based
r on updated EMFAC 6C emission factors.

2. IMPACTS

An air quality analysis was conducted to compare the effects of proposed project land use changes with site land uses under the adopted SNCP on both a micro- and regional scale.

a. Models Used

The microscale analysis involved the use of the CALINE 3 Model. The regional scale analysis consisted of estimating the gross daily emissions that would occur from vehicle trips generated by the study area buildout with the two projects.

The following analysis assumed that complete development of the site would occur in 10 years or by 1990 (the applicants have estimated completion within 7 years of approval). Development by the year 2000 was also analyzed for comparison.

b. Microscale Analysis

In determining the roadside ("mobile-source") air quality effects of the land use change, a microscale analysis for CO was conducted. Predicted traffic volumes for the years 1990 and 2000 for the adopted community plan and the proposed project changes were used in the comparison. Only those streets affected by traffic from the projects were considered.

- Table 45 provides a comparison of predicted roadside CO levels for various receptors shown on Figure 18 with and without the projects. It is apparent that implementation of the proposed projects would increase CO levels at some locations such as Receptor 8 over those estimated to occur with SNCP. Maximum estimated levels at Receptor 8 are expected to increase from 17.2 ppm to 20.8 ppm in 1990.
- Overall, the increases in onsite CO levels vary from 0.1 to 3.6 ppm, depending on receptor location. These increased values, however, still remain well below the respective federal or state one-hour CO standards of 35 and 40 ppm.

c. Regional Analysis

- The proposed projects would increase South Natomas-generated total vehicle miles travelled (VMT) from 283,500 to 651,150 per day (Table 30, p. F-16). Table 46 compares the adopted SNCP-generated VMT with that of the proposed projects. The total gross emissions of each pollutant for both cases are shown on Table 47. The total project-generated gross emissions would increase about 130 percent over the current SNCP buildout emission projections for the site.

- It is also of interest to compare the difference between the project-related emissions with future emissions projections (1990) for the Sacramento Air Quality Maintenance Area. Project and SNCP emissions are compared on Table 47 with the total projected highway vehicle emissions for the Sacramento air basin.

- SACOG has stated that development and corresponding emissions from the South Natomas area as set forth in the SNCP were included in the projected growth for the Sacramento AQMA Air Quality Plan.⁵ Thus, emissions for the adopted SNCP have previously been deemed acceptable for the Sacramento Valley airshed.

- If the proposed projects are implemented, the increase in emissions would account for a small percentage of the total projected 1990AQMP highway vehicle emissions inventory (1.4 to 3.0 percent) depending upon the specific pollutant.

- However, the proposed project emissions would still add 1.4 to 3 percent to the 1990 inventory, an increment which would prevent the Sacramento area from meeting the 1987 attainment goal set forth in the SACOG Air Quality Plan (see p. K-1, section 1.a.).

Table 45
PREDICTED ROADSIDE CARBON MONOXIDE LEVELS: SOUTH NATOMAS
COMMUNITY PLAN VS. PROPOSED PROJECT

| Receptor | Location ^c | Peak 1-Hour Concentration (ppm) at Edge of Roadway ^{a,b} | | | |
|----------|-----------------------------------|---|---------------------|-------------------------|---------------------|
| | | 1990 Adopted Plan | Proposed Project | 2000 Adopted Plan | Proposed Project |
| r 1 | I-5 at Garden Hwy | 5.4 | 6.3 | 4.5 | 5.1 |
| r 2 | I-5 at El Camino | 8.7 | 11.4 | 7.1 | 9.0 |
| r 3 | I-5 at I-880 | 4.5 | 4.6 | 3.8 | 3.9 |
| r 4 | I-880 at El Camino | 3.6 | 3.8 | 3.1 | 3.2 |
| r 5 | I-880 at Northgate | 7.5 | 7.9 | 6.0 | 6.3 |
| r 6 | I-880 at Garden Hwy | 2.7 | 2.7 | 2.4 | 2.4 |
| r 7 | El Camino at Natomas Oaks Dr. | 6.8 | 8.3 | 5.6 | 6.9 |
| r 8 | El Camino at Truxel | 17.2 | 20.8 | 13.8 | 16.7 |
| r 9 | El Camino at Northgate | 13.5 | 14.3 | 10.7 | 11.6 |
| r 10 | Garden Hwy at Natomas Oaks Dr. | 5.2 | 6.3 | 4.4 | 5.4 |
| r 11 | Garden Hwy at Truxel | 3.0 | 3.1 | 2.7 | 2.6 |
| r 12 | Garden Hwy at Northgate | 15.8 | 18.5 | 13.0 | 15.1 |
| r 13 | Truxel at San Juan | 2.9 | 3.0 | 2.6 | 2.7 |
| r 14 | Northgate at San Juan | 6.7 | 7.1 | 5.6 | 5.8 |

SOURCE: CH2M HILL.

r ^aA 2 parts per million (ppm) CO background was added to all predicted concentrations. Federal 1-hour standard for CO is 35 ppm.

r ^bCalculated based on updated EMFAC 6C emission factors.

^cSee Figure 18 for receptor locations.

r Table 46 deleted.
r Refer to Table 30 in Traffic section (p. F-16) for same data.

Table 47

COMPARISON OF PROJECT SITE GROSS EMISSIONS
WITH 1990 SACRAMENTO AQMP EMISSION PROJECTIONS (tons/day)¹

| Pollutant | Site Generated Emissions | | | AQMP Highway Vehicle Emissions ³ | Percentage of Total ⁴ |
|------------------------------------|--------------------------|---------|-------------------------|--|-------------------------------------|
| | Adopted Plan | Project | Difference ² | | |
| Carbon Monoxide (CO) | +4.8 | +11.0 | +6.2 | 264.8 | +2.3 |
| Nitrogen Oxides (NO _x) | +0.6 | +1.3 | +0.7 | 48.4 | +1.4 |
| Total Hydrocarbons (THC) | +0.4 | +1.0 | +0.6 | 27.7 | +2.2 |
| Sulfur Dioxide (SO ₂) | +0.07 | +0.17 | +0.1 | 3.3 | +3.0 |
| Particulates (TSP) | +0.1 | +0.24 | +0.14 | 6.0 | +2.3 |

SOURCE: CH2M HILL.

¹Calculations based on updated EMFAC 6C emission factors.

²Difference between project and SNCP emissions.

³Portion of 1990 Sacramento Air Quality Maintenance Plan emissions projections that are generated only by highway vehicles. Source: SRAPC Air Quality Plan, Technical Appendix, January 1979.

⁴Percentage = $\frac{\text{Difference (Project-SNCP emissions)}}{\text{AQMP Highway Vehicle emissions}} \times 100$

3. MITIGATION MEASURES

a. Mobile Sources

Transit service is often the best mechanism for reducing vehicle trips and related mobile source emissions. However, for the South Natomas community in 1990, it has been estimated in this analysis (TRAFFIC AND CIRCULATION section) that transit use will account for only about 6 percent of total trips generated to and from the area. Thus, transit service cannot be expected to become a significant factor in reducing the predicted 28 percent increase in site-generated emissions.⁶

Even if improved transit service could be made available in the future, and significant ridership (6 to 30 percent of total travel) was attracted, the resultant air pollution reduction would be small.

Because the project emission increases would still be substantially below standards established in the Sacramento AQMA Air Quality Plan, this lack of effective traffic-related air quality mitigation opportunities would not affect project compliance with current regulations.

b. Stationary Sources

Stationary source emissions are not expected from the proposed projects. Unlike industrial developments, business parks consisting of commercial and office space are not normally emitters of point source pollutants.

However, if a stationary source does locate in the projects, an "Authority-to-Construct" permit would be required by the Sacramento County Air Pollution Control District. The permit requirements are designed to prevent violations of air quality standards through the use of "Best-Available-Control-Technology" and other compensative reductions (offsets).

4. REFERENCES

¹Sacramento Regional Area Planning Commission, Final Air Quality Plan, January 1979.

²Robert Cofer, Sacramento County Air Pollution Control District, Personal Communication, re: "Sacramento Area Air Quality", by CH2M Hill, Sacramento, March 12, 1980.

³CALTRANS, CALINE 3--A Versatile Dispersion Model for Predicting Air Pollutant Levels Near Highways and Arterial Streets, FHWA/CA/TL-79/23. November 1979.

⁴CALTRANS, SATS COMPUTER MODEL RUN FOR NORTHEAST SACRAMENTO CORRIDOR STUDY, 1979.

⁵Gary Stonehouse, Sacramento Area Council of Governments, Personal communication, re: "Projects' compliance with Sacramento AQMA Air Quality Plan", by CH2M Hill, June 6, 1981.

⁶Sacramento Regional Area Planning Commission, Draft Environmental Impact Report for the Regional Transportation Plan for the Sacramento Region, January 1977.

Errata D: Miscellaneous Corrections

N. ENERGY

Table 53 (p. N-6) indicates that 750,000 square feet of commercial development has been proposed, whereas only 75,000 sq.ft. has been proposed. Error is typographical and does not affect estimated energy consumption results.

Q. ALTERNATIVES TO THE PROPOSED ACTION

Tables 56, 57, and 65 (pp. Q-4, Q-18, and Q-26) in the August DEIR are in error and are hereby superseded by the following corrected tables:

Table 57--September 1981 Errata (Supersedes Table 57 in August 1981 Draft EIR)
COMPARISON OF ALTERNATIVES: BASIC CHARACTERISTICS

| | Number of Dwelling Units | | So. Natomas Land Use Allocation (Gross Acres) | | | | | | | South Natomas Employment | |
|--|--------------------------------|----------|---|-------------|--------|--------|--------|--------|-------|--------------------------------|-----------|
| | | | Population at Buildout | Residential | | Office | | Comm'l | | | |
| 1978 PLAN ("No Project") ^{a,b} | 21,700 | | 54,300 | 2,949 | | 35 | | 117 | | 7,161 | |
| 1978 PLAN WITH PROPOSED CHANGES ^c | | | | | | | | | | | |
| w/Natomas Eastside only | 21,124 | (-576) | 52,860 | 2,848 | (-101) | 133 | (+98) | 127 | (+10) | 14,450 | (+7,300) |
| w/Gateway Centre only | 20,489 | (-1,211) | 51,200 | 2,847 | (-102) | 114 | (+79) | 117 | (+0) | 13,360 | (+6,200) |
| w/Both projects | 19,913 | (-1,787) | 49,780 | 2,746 | (-203) | 213 | (+178) | 128 | (+11) | 20,650 | (+13,500) |
| ALTERNATIVES ^d | | | | | | | | | | | |
| 1. No Project | 21,700 | (-0) | 54,300 | 2,949 | (-0) | 35 | (+0) | 117 | (+0) | 7,161 | (+0) |
| 2. I-5 Frontage | 21,405 | (-295) | 53,510 | 2,840 | (-109) | 145 | (+110) | 103 | (-4) | 15,330 | (+8,170) |
| 3. I-880 Frontage | 21,190 | (-505) | 52,990 | 2,807 | (-142) | 175 | (+140) | 117 | (+0) | 16,330 | (+9,170) |
| 4. NW Quadrant | 21,085 | (-615) | 52,700 | 2,846 | (-103) | 138 | (+103) | 117 | (+0) | 12,710 | (+5,550) |
| 5. North Natomas | 21,700 | (-0) | 54,300 | 2,949 | (-0) | 35 | (+0) | 117 | (+0) | 7,161 | (+0) |
| -- Outside Planning Area | -- | -- | -- | -- | -- | 247 | (+212) | 0 | (+0) | 13,940 | (+13,940) |
| -- Total | 21,700 | (-0) | 54,300 | 2,949 | (-0) | 282 | | 117 | (+0) | 21,100 | (+13,940) |

SOURCE: Wagstaff and Brady

^aEstimates by city staff (Table I; April 24, 1981, memorandum from D. Parker, City Planning Department)

^bTable 6, p. D-12.

^cDifferences calculated from data in Tables 6 and 59

^dDifferences calculated from data in Tables 59-63

Note: The following table supersedes Table 56 in the August DEIR:

Table 56 SUMMARY OF COMPARATIVE IMPACTS -- PROJECT ALTERNATIVES

| IMPACT CATEGORY | NO PROJECTS | PROJECTS | I-5 FRONTAGE | I-880 FRONTAGE | NW QUADRANT | NORTH NATOMAS |
|---|---|---|---|--|--|--|
| SOUTH NATOMAS LAND USE | Res'l use emphasis 21,700 dus (2,949 ac) r 543,000 s.f. of office (35 ac) 0.8 million s.f. of comm'l (117 ac) Res'l uses exposed to I-5, I-880, and Garden Hwy Compatible with CBD goals | Creates office-res'l mix Loss of 1787 dus (from "no projects") r 3.0 million s.f. of office (+180 ac) r 140,000 s.f. of comm'l (+11 ac) Res'l uses buffered from I-5, but exposed I-880 Some conflict with CBD goals | Creates office-res'l mix r Loss of 295 dus (from "no project") r +1.9 million s.f. of office (+110 ac) Little change in comm'l (-4 ac) Res'l uses buffered from I-5 and I-880 Little conflict with CBD goals | Office-res'l mix r Loss of 505 dus (from "no project") r +2.5 million s.f. of office (+140 ac) No change in comm'l Res'l uses buffered from freeways by office devel. Little conflict with CBD goals | Office-res'l mix (54/28%) r Loss of 615 dus (from "no project") r +1.4 million s.f. of office (+103 ac) No change in comm'l No buffering Less freeway frontage for offices. Little conflict with CBD goals | Office space shifted to North Natomas Same res'l emphasis in SN area 212 acre office node @ North Natomas Demand for SN housing (closest area) still affected Non-contiguous, inefficient, growth-inducing extension of infrastructure Some conflict with CBD goals |
| SOUTH NATOMAS POPULATION AND HOUSING | 21,700 dus @ buildout 54,300 pop. @ buildout SN area cap = 15.1% of proj. city hsg. growth, 1980-95 | 19,913 dus (-8.2%) 49,780 pop. at buildout SN area cap. = 13.8% of proj. city hsg. growth, 1980-95 | 21,400 dus (-1.4%) 53,510 pop. (loss of 790) SN area cap. = 14.9% of projected city hsg. growth, 1980-1995 Housing cost reductions thru higher densities | 21,190 dus (-2.0%) r 52,990 pop. @ buildout (loss of 1310) SN area cap. = 14.7% of proj. city hsg. growth, 1980-95 Housing cost reductions thru higher densities | 21,080 dus (-2.8%) r 52,700 pop. @ buildout (loss of 1600) SN area cap = 14.6% of proj. city hsg. growth, 1980-1995 | No displacement in SN area Increased hsg pressure in NN |
| SOUTH NATOMAS EMPLOYMENT | Total SN area direct jobs = 7,160 or 1.0% of proj. SMSA job total | Total SN area direct jobs = 20,650 (+13,500) or 2.8% of proj. 1995 SMSA ttl. | No sign. change in labor market impacts from projects Total SN area direct jobs = 15,330 (+8,170) or 2.1% of proj. 1995 SMSA ttl. Fewer "new jobs" attracted to region | Less effect on labor market than projects Total SN area direct jobs = 16,330 (+9,170) or 2.2% of proj. 1995 SMSA job total Fewer "new jobs" attracted to region | Job effects similar to projects total SN area direct jobs = 12,710 (+5,550), or 1.7% of proj. 1995 SMSA job total | Total SN area direct jobs = 7160 NN area direct jobs = 13,500 Total direct jobs = 20,660 or 2.8% of proj. 1995 SMSA job total |
| SOUTH NATOMAS TRAFFIC | r 227,400 ADT Unacceptable LOS at 1 intersection, severe at none | r 269,525 ADT (+42,125 trips) r = 18.5% increase Unacceptable LOS at 4 intersections, severe at 4 | r 251,800 (+24,400 trips) r = 10.7% decrease Unacceptable LOS at 4 intersections, severe at 3 | r 259,900 ADT (+32,500 trips) r = 11.7% increase Unacceptable LOS at 5 intersections, severe at 4 | r 245,000 ADT (17,600 trips) r = 7.7% increase Unacceptable LOS at 4 intersections, severe at 4 | r 227,400 ADT for SN area r (same as No Projects) r +50,300 ADT for North Natomas Unacceptable LOS at 3 intersections, severe at 2 |
| PUBLIC SERVICES AND FISCAL | One fire station req'd on project sites No major effect on police costs Water and sewer cap. may be exceeded Drainage adequate One elem. school req'd on project sites | One fire station reg'l on project sites (i.e. no difference) No sig. effect on police costs r Need for parks reduced (-4520 pop.) Need for schools reduced by one r \$295,000/yr. more than "no projects" in net cost-revenue surplus | No sig. difference in police/fire needs Less water/sewer use than "no projects" Increase in drainage costs Need for parks and schools space r Less than "no projects" (-790 pop.) \$120,000/year more than "no projects" in net cost-revenue surplus | Need for parks and school space less than "no projects" (-1310 pop.) No sig. difference in police/fire needs Increases in drainage costs Less water/sewer use than "no projects" \$215,000/yr. more than "no projects" in net cost-revenue surplus | r Need for parks and school space less than "no projects" (-1600 pop.) No sig. difference in police/fire needs Less water/sewer use than "no projects" Increases in drainage costs \$110,000/yr. more than "no projects" in net cost-revenue surplus | No direct effect on park and school expenditures Sig. add'l fire costs Add'l police costs Sewer service extension cost = \$10-15 million plus \$4 million EPA fine Annual costs would exceed services |
| AIR | r 1 to 3% increase in emissions would be well under fed. or state max. standards, but would prevent the area from meeting SACOG Air Quality Plan attainment goal for 1987 | Slight increases in local CO levels, well below fed. and state standards 28% increase in SN area gross emission over "no projects" = 2-3% increase in reg'l airshed emissions | Local effects similar to projects Slightly less reg'l emissions than projects | Local effects similar to projects Slightly less reg'l emissions than projects | Local effects similar to projects Slightly less reg'l emissions than projects | Lowest local impact Slight increase in reg'l emissions |
| NOISE | Traffic noise will exceed city standards along major local routes Sound walls or berms req'd | No noticeable increase over "no project" roadside noise levels Roadside noise "conditionally acceptable" at office frontage on I-5 | Sign. less local impact than projects Negligible reduction in community impacts | Local impact sig. less than projects Negligible reductions in community impacts | Local impact sig. less than projects Slight reductions in community noise levels | No change in SN area Noticeable change at NN, but no impacted uses |
| ENERGY | Transp. energy use = 7.0 million therms/yr. Total energy use = 11.1 million therms/yr. | Transp. energy use = 13.2 million therms/yr. Total energy use = 19.8 million therms/yr. = 13% more than "no projects" | 7% less transp. energy use than projects Overall 15% less energy use than projects | 10% less transp. energy use than projects Overall 17% less energy use than projects | 68% less transp. energy use than projects Overall 69% less energy use than projects | 45% less trans. energy use than projects Overall 44% less energy use than projects |

r Table 65--October 1981 Errata (Supersedes Table 65 in August 1981 DEIR)
CHANGES IN TRAFFIC GENERATION DUE TO
PROJECT AND PROJECT ALTERNATIVES

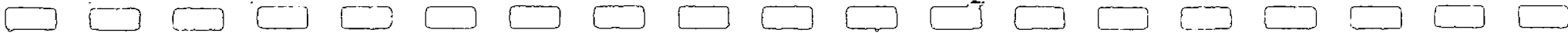
| Land Use Type | SNCP Total ^a | ADT Changes for Each Alternative | | | | |
|------------------|----------------------------|----------------------------------|-----------|---------|---------|-------------------------------------|
| | | Project | I-5 | I-880 | NWQ | NN |
| r Residential | 21,550 | -12,980 | -3,381 | -4,136 | -4,928 | No Change |
| r Commercial | 10,500 | +9,650 | No Change | +1,400 | +1,400 | No Change |
| r Office | 4,800 | +45,450 | +27,750 | +35,250 | +21,150 | No Change (+50,250) ^b |
| r Totals | 36,850 | +42,125 | +24,369 | +32,514 | +17,622 | No Change (+50,250) |

SOURCE: Wagstaff and Brady

^aTotal ADT for the "Comparison Area" shown in Figure 22

^bAdded ADT at North Natomas site, outside comparison area

VI. APPENDICES



Appendix A

MEMORANDA AND PREPARED PUBLIC
HEARING COMMENTS

DEPARTMENT OF TRANSPORTATION

DISTRICT 3

P.O. BOX 911, MARISVILLE 95901

Telephone (916) 674-4242

August 25, 1981

CITY PLANNING COMMISSION

AUG 27 1981

RECEIVED

03-Sec-5 - 25.4
pb306

Mr. Cliff Carstens
Planning Department
City of Sacramento
927 10th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Carstens:

You have contacted members of the District 3 Office to seek guidance on proposed developments and modifications to Interstate 5 as mitigation measures. You have requested a Caltrans position on widening the West El Camino Bridge over I-5 and providing an eastbound Garden Highway to southbound I-5 right-turn on-ramp.

First, we would like to review concerns expressed in the District's letters during late 1977 and early 1978 commenting on the draft South Natomas Community Plan (copies attached). Caltrans stated that the planned density of development appeared to overload the freeway interchanges that serve the area. A recommendation was made that mitigation measures be developed to alleviate expected traffic congestion. Another recommendation was that these measures be evaluated prior to establishing the density of allowed development since it would then be possible to modify densities if operating problems appeared too great.

Caltrans has just given a brief review of traffic projections prepared by JHK and Associates and by Wagstaff and Brady. A comparison has been made of those respective projections with model assignments prepared over the past year for the North-East Corridor Study. It appears that the much higher peak demands shown in the work of JHK and Associates more nearly reflects conditions that will exist as the South Natomas community approaches build-out. These volumes will dramatically exceed the capacity of some of the freeway design features.

The most critical problem that will exist is caused by the limited capacities of the weaving section between the I-5 northbound Garden Highway on-ramp and the northbound West El Camino off-ramp and the reverse southbound weaving section between the West El Camino on-ramps and the Garden Highway off-ramp. The absolute capacity of each of these weave moves is only 2200 vehicles per hour. This 2200 capacity represents the sum of the combined on-ramp volume(s) and the off-ramp volume. Not only does the weave capacity limitation point out future operational problems, it also identifies a critical problem if business offices were to be placed in an area served by the I-5/Garden Highway

Mr. Cliff Carstens

Page 2

August 25, 1981

interchange. Incoming southbound trips in the morning from I-5 to proposed business offices would have to weave across the high number of southbound trips entering from West El Camino. The reverse problem would exist in the evening.

Further, it is stressed that land use decisions throughout the City of Sacramento should try to maximize the utility of the proposed light rail transit. It is recommended that the City encourage office development served by the light rail while discouraging it in other portions of the City.

Questions have been posed about possible modifications to interchanges on I-5. A proposed ramp from eastbound Garden Highway to southbound I-5 has been suggested. For a number of reasons it is recommended no further consideration be given to this proposal. First, such a ramp would substantially be on structure and would be excessively expensive. There would be weaving problems between this new ramp and the Richards Boulevard off-ramp at the south end of the American River Bridge. Further, to the extent that it would add more traffic to I-5, it would increase morning congestion at the downtown access ramps at J and Q Streets. It would also tend to concentrate more commuters into the return evening peak hour, which would increase congestion on off-ramps into the South Natomas area.

A second proposal was the widening of the West El Camino structure over I-5. It must be stressed that funding from the State Highway Account is extremely scarce and even Federal-Aid Urban financing has many competing uses. In order for the West El Camino structure to be widened, the project would have to be included in the State Transportation Improvement Program (STIP). Since there is little hope of State funding being available to widen the West El Camino structure, inclusion of the project in the STIP would undoubtedly require a stipulation that non-State funds would be used to pay construction costs. Inclusion in the STIP would also require justification of the need to widen the West El Camino overpass.

Caltrans is not insensitive to the problems that will exist with the now committed urbanization of South Natomas. This office strongly supported allocation of a portion of discretionary financing from the Secretary of Business, Transportation and Housing to help initiate transit service into the area. That has lead to the now current RT services to South Natomas. Although transit will help, it appears that other mitigation measures will also be necessary to prevent major deterioration in the level of service on the I-5 and I-80 freeways. By the time of full build-out, it is quite likely that ramp metering and high occupant vehicle ramp bypass lane strategies would be warranted along I-5.

Caltrans would also like to point out that if current rates of development continue, the ramp terminal intersections at both Garden Highway and West El Camino will warrant signalization within a few years. Caltrans may have

1


Mr. Cliff Carstens
Page 3
August 25, 1981

difficulty financing them in a timely manner, and quite likely would need financial participation from the City of Sacramento.

We hope this letter is of assistance to you as you consider strategies to implement the Community Plan adopted by the City of Sacramento in 1978.

Very truly yours,

LEO J. TROMBATORE
District Director of Transportation

By 
E. F. Galligan
Deputy District Director
Planning and Public Transportation

Attachs.

PACIFIC GAS AND ELECTRIC COMPANY

REG-1E + 5555 FLORIN-PERKINS ROAD • P.O. BOX 7444 • SACRAMENTO, CALIFORNIA 95826

CITY PLANNING COMMISSION

September 9, 1981

South Natomas Business
Park Draft EIR
670

SEP 10 1981

RECEIVED

Sacramento City Planning Department
927 10th Street, Suite 300
Sacramento, California 95814

Attention: Mr. Cliff Carstens,
Senior Planner

Gentlemen:


The subject EIR has been reviewed by PGandE. We have no comments except on Paragraph 2, Section 1a, which gives the impression that the transmission line traversing the project is owned by SMUD and service can be acquired from it. The line is owned by PGandE, and therefore service cannot be acquired from it since it is within the SMUD service area.

There is no mention of PGandE's high pressure gas transmission main paralleling the electric facilities. The main is on the north side of the electric transmission line.

If you have any questions, please contact Mr. W. E. Bird at 383-4141, Ext. 256.

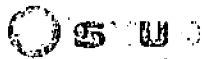
Sincerely,

E. C. HORNOF,
Manager, General Services

By 
KEITH J. LAMB,
Division Land Supervisor

WEBird/jll
cc: DHyers
PMerrill
JARotlisberger

2



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, Box 15630, Sacramento, California 95813; (916) 452-3211

CITY PLANNING COMMISSION

SEP 16 1981

RECEIVED

September 11, 1981

MR. CLIFF CARSTENS
SENIOR PLANNER
CITY PLANNING DEPARTMENT
927 10th STREET, SUITE 300
SACRAMENTO, CA 95814

Dear Cliff:

In reviewing the South Natomas Business Parks Draft EIR, the following comments are offered:

1. SMUD's general layout of the South Natomas area has been completed based on the 1978 South Natomas Community Plan. Therefore, any additional electrical demand brought about by the proposed projects will require changes to SMUD's present South Natomas plan. These changes might include acquiring right-of-way for 69,000 Volt Subtransmission line and Substation site acquisition(s).
2. The subject Draft EIR should contain estimated demand (kilowatt) data as well as the energy data presented on Table 53.
3. It is difficult to compare "apples with apples", since Table 50 contains data for the entire South Natomas area and Table 53 contains data for the proposed projects only. A breakdown on Table 50 for the proposed projects would be helpful.

It is hoped that the above comments will be addressed in the Final EIR. If there are any questions regarding the above comments, please contact me.

Sincerely,

David Otu

David Otu
Electrical Engineering Associate



CITY OF SACRAMENTO

CITY PLANNING COMMISSION

SEP 22 1981

RECEIVED

DEPARTMENT OF FINANCE
DIVISION OF REVENUES AND COLLECTIONS
915 I STREET
SACRAMENTO, CA 95814
ROOM 104
TELEPHONE (916) 444-6881

September 18, 1981
RC810146:MLM/po

TO: Cliff Corstens
Senior Planner

FROM: Ken Nishimoto
Administrative Assistant II

SUBJECT: Draft EIR for South Natomas Business Park Proposal (Cost/Revenue Analysis)

In reviewing the analysis of the costs and revenues of the South Natomas Business Park EIR, I agree with the report's conclusion that the proposed projects will reduce costs and increase revenues for the City of Sacramento. The projects propose commercial and office space to replace residential units. In this review, I will refer to the South Natomas Business Park proposal as the Commercial Plan and the existing plan as the Residential Plan.

The EIR analyzes costs in general terms by breaking them down into four (4) major categories that affects the City of Sacramento: Public Safety, Public Works, Community Services and Regional Transit. Costs for Public Safety, Police, Fire, and Public Works are concluded by the report to be basically the same under Commercial Plan and the Residential Plan. This is substantiated by statements from Police and Fire Representatives and by City Staff. Community Services is an area where cost savings are identified. The Commercial Plan requires less park acreage. A cost savings will be realized in park construction costs and also park maintenance, which will be realized on an ongoing basis. No conclusion was made on Regional Transit, other than to discuss potential loss of funds. In reviewing the analysis of the cost in the EIR, there is a lack of specific cost estimates. The analysis is very general with specific costs provided only for park construction and maintenance costs.

Revenues are analyzed in the EIR in two (2) ways:

- (1) Sources of revenue increases of the Commercial Plan over the Residential Plan;
- (2) Revenue loss due to Commercial Plan.

3

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Cliff Carstens
September 21, 1981
Page 2

Sources of revenue increases analyzed in the EIR are; Construction Permits, Property Tax and Sales Tax. I feel the analysis of the property tax revenue is low, and the sales tax revenue high. The EIR property tax revenue analysis is as follows:

There will be an overall net increase in property tax due to a higher assessed value. The EIR concludes the City of Sacramento will receive 12 percent of this net increase on an annual basis. The 12 percent is the City's share of the total property taxes collected in the Sacramento County. What the EIR did not recognize was that the increase in assessed value is totally within the City of Sacramento, therefore, this will increase the City of Sacramento's share (12%) of the total property tax revenue. Growth in assessed value within a tax area is used to determine tax increment growth in determining property tax allocations. The EIR also concludes that the net increase will be an ongoing revenue. The revenue will be ongoing but the net increase will decrease annually. The reason for this is that residential property turnover is more frequent than commercial property. Under the Residential Plan the assessed value will be increasing at a rate closer to 13%, where under the Commercial Plan, the assessed value will increase at a rate closer to 2%. This is due to provisions of Proposition 13, which limits assessed value growth to 2% annually, unless the property is sold at which time the property will be reassessed at current value.

Sales tax projections are provided by this report based on square footage of commercial space. This gain in sales tax revenue may be high because it may be taking sales tax revenue away from other City of Sacramento locations.

The potential loss of revenue due to reduction in population appears to be on the high side. State Subventions are cited as a source of revenue loss due to population reduction. An amount of \$24.00 per capita is used by the report. The City of Sacramento already faces a reduction in the mentioned State Subventions by as much as \$10.57 per capita, pursuant to 1981 legislation (SB102). This will reduce the amount of revenue loss estimated by the EIR for State Subventions.

In conclusion, the analysis of cost and revenue in the Draft EIR for South Natomas Business Park contained a lack of statistical and financial data to support the majority of the costs analysis. I do not agree with the amounts provided as revenue estimates. Analysis of property tax revenue to determine net revenue increases is not in accordance with AB 8, and growth factor under provisions of Proposition 13. Latest State Subvention figures are not utilized to determine revenue loss that are tied to population. Both the lack of data to support costs analysis and the variances in the dollar amounts in the revenues are recognized and addressed in the conclusion section of the Draft EIR.


Ken Nishimoto
Administrative Assistant II




CITY OF SACRAMENTO

DEPARTMENT OF COMMUNITY SERVICES

3520 FULM AVE
(916) 448-5200

SACRAMENTO, CA 95817


G. Erling Linggi
Acting Director

September 22, 1981

MEMO TO: Cliff Carstens, Senior Planner

SUBJECT: Draft EIR for South Natomas Business Park

Should the business park become a reality, our concern still focuses on the saving of the large, mature oak trees in the area. Many of these are of heritage type and are irreplaceable. There are no other comments on the EIR.


G. ERLING LINGGI
Acting Director of
Community Services

GEL:js

CITY PLANNING COMMISSION
SEP 24 1981
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CHUCKER ART MUSEUM DIVISION
GOLF DIVISION
METROPOLITAN ARTS DIVISION
MUSEUM AND HISTORY DIVISION
RECREATION DIVISION
PARKS DIVISION
ZOO DIVISION

5



Regional Transit
P.O. BOX 2110 • 1400 20TH STREET • SACRAMENTO, CA 95810 • (916) 447-7551

SEP 25 1981

RECEIVED

September 24, 1981

Mr. Clif Carstens, Senior Planner
Sacramento City Planning Department
927 - 10th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Carstens:

Thank you for the opportunity to comment on the draft EIR for South Natomas Business Park proposals.

Most recent RT service projections do not support the 6% future transit use assumption made by the EIR (see "Traffic and Circulation Impacts, Transit Services," p. F-3). If this assumption is to be realistic, the EIR should recommend measures that would permit RT to provide transit services to the Business Parks area sufficient to accommodate 6% of all trips generated by the development in 1990. Such measures should include capital and operating contributions made by the developers or tenants of the parks to RT.

We do not fully concur with the EIR's findings that van-pooling is not a viable way to serve the business parks area. We feel that there is enough potential for various ridesharing options such as van/carpools and subscription bus service as the business parks develop.

While we believe that the mitigation measures and traffic improvements suggested in the draft EIR will provide adequate access facilities for transit vehicles to the parks, we strongly recommend that the City secure transit improvements, as needed, from the various developers in the business parks area as a prerequisite to granting development permits.

Please call me if you have any questions regarding the above comments.

Sincerely,

Gene Moir

Gene Moir
Manager of Planning

GM/PR:ct



capitol bicycle commuters assn.

P. O. BOX 1541
SACRAMENTO, CA 95807
September 25, 1981

CITY PLANNING COMMISSION

SEP 28 1981

RECEIVED

Clif Carstens, Senior Planner
Sacramento City Planning Department
927-10th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Carstens:

Thank you for the opportunity to comment on the draft EIR on the proposed business parks in South Natomas. CBCA's comments reflect the association's general concern with promoting bicycle commuting throughout Sacramento and the interests of members from the South Natomas Community.

CBCA recommends that the projects be disapproved unless they are modified to include these specific mitigation measures:

1. Because the projects will cause extremely heavy traffic congestion on surface streets during commute hours, develop Class I bicycle paths in the vicinity of the projects. Possible locations are along West El Camino west of the current Northgate subdivision, on Truxel Road north from the Garden Highway, on the proposed Bannon Slough Parkway, and on yet to be built surface arterials. The developers should pay 50% of these costs, at least.
2. On streets, intersections, and overpasses where Class I paths are not possible, provide clearly marked and swept on-street bike lanes with bicycle activated traffic signals. Again, the developers should pay 50% or more of these costs.
3. Require secure employee bicycle parking, locker and shower facilities, and encourage employers in the projects to advertise their location as prime for bicycle commuting.
4. Require employers in the projects to offer flextime to their employees, particularly to those who wish to commute by bicycle.
5. Strongly suggest, require if possible, employers in the projects to offer economic incentives to their employees who commute by bicycle. Incentives may include such things as free or discounted bus passes for the months of November through February; partial reimbursement for the cost of buying a commute bike computed at 1¢ per mile for the miles actually commuted up to a set maximum of, say, \$50 for the first year of bicycle commuting; require employees to park in designated off-street

parking spaces charging rent for auto parking and not charging for bicycle parking; provide free or discounted safety gear for commuters, e.g. helmets, vests, lights, etc.

CBCA understands that implementing these ideas will be costly. But, the costs would be spread over the 10-year project development plan, be borne by several tenant employers, and may not be all that large to begin with. Further, the developers and businesses should bear these mitigation costs as part of the price for modifying a fairly recently adopted community plan for their own economic gain.

CBCA's Argument for Mitigating Traffic Congestion by Aggressively Promoting Bicycle Commuting

The draft EIR strongly emphasizes the traffic congestion the projects will cause. The draft EIR fails to identify alternatives which really mitigate the traffic problem aside from "no project." And, the draft EIR is peculiarly silent on bicycle commuting as a practical mitigating strategy in spite of the goals of the South Natomas Community Plan which prohibit disruptive traffic in residential areas. (Goal #3) and which encourage reduced dependence on the automobile in the area (Goal #7).

The draft EIR states that about 70% of the employees working for businesses to be housed in the projects will be non-professional, i.e. people whose income is primarily in the low to moderate income brackets. Persons in these lower income brackets are those who find carpooling, bus transportation, and bicycle commuting most appealing, economically. According to the draft EIR, 79% of the households in South Natomas and nearly 90% of the households of North Sacramento fall into these lower income brackets. The implication is clear: To the extent that the 70% non-professional employees are recruited from South Natomas and North Sacramento, to that extent there is excellent opportunity to promote bicycle commuting for personal economic reasons.

CBCA submits that the business parks as proposed or as moved anywhere except into North Natomas offer particularly good opportunities for bicycle commuting. South Natomas, North Sacramento, Downtown Sacramento, and parts of Arden Fair and Rio Linda are all within 5 miles of the projects. Much of the McKinley Park and Elvas areas and the neighborhood of Fulton and Fair Oaks are within easy access of the American River Bikeway. Furthermore, most of these areas already are or soon will be connected to the general area of the proposed projects by grade-separated bicycle paths for much of the commute distance. All that is needed is to continue that safety and convenience to the projects themselves and then bicycle commuting will be truly available to the employees.

How many bicycle commuters should the projects provide for? Suppose the areas mentioned above supply 40% of the employees for the projects. The $(.7)(15,800)(.4) = 4,242$ non-professional employees are prime candidates for bicycle commuting because of their location as well as their personal economic advantage. And $(.3)(15,800)(.4) = 1,896$ "professional" employees are also prime candidates for bicycle commuting. That is a total potential bicycle commutership of over 6,000 persons. Certainly there is rich opportunity to get 1,000 of them to commute by bicycle.

CBCA urges the City of Sacramento to take advantage of the unique opportunities for bicycle commuting in the South Natomas area and impose requirements on the developers of the proposed business parks to encourage bicycle commuting. While there is a risk that the expenditures proposed will not result in significant numbers of bicycle commuters, it is a certainty that planning too small and not truly providing attractive, safe, and secure bicycle commuting facilities will prevent average employees from bicycle commuting and will force them into automobiles or crowded buses for their commute trips.

Sincerely,


Jim Baetge, President

Capitol Bicycle Commuters Association



EDMUND G. BROWN JR.
GOVERNOR

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814
916/445-0613

CITY PLANNING COMMISSION

OCT 11 1981

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Cliff Carstens
October 1, 1981
Page Two

October 1, 1981

Cliff Carstens
Senior Planner
City of Sacramento
Planning Department
927 Tenth Street, Suite 300
Sacramento, CA 95814

Regarding: SCH #81090406
South Natomas Business Park Proposals

Dear Mr. Carstens:

The State Clearinghouse review of the draft EIR for the South Natomas Business Park Proposals is complete. Comments of other state agencies are attached. Should you have any questions about these comments, please contact the appropriate agency staff. Highlights of the state comments follow.

CalTrans

Two proposals for a ramp from eastbound Garden Highway to southbound Interstate 5 (I-5), and a widening of the West El Camino overcrossing over I-5 do not appear feasible for several reasons explained in District 3's letter.

A major concern is that the volumes of traffic generated will ultimately exceed the capacity of some of the freeway design features on I-5. The limited capacities of weaving sections of the freeway present future operational and safety problems. District 3 staff strongly disagree with the conclusion in the EIR that levels of service on roadways outside the project area are not expected to be lowered as a result of the project. The adverse impacts on southbound I-5, especially at the "J" and "Q" Streets off-ramps, should be discussed.

The use of light rail and other transit modes are strongly recommended. The City should encourage office development served by light rail. Although transit may help mitigate congestion problems, other mitigation measures must be included to prevent major deterioration in the level of service on the I-5 and I-880 freeways. Ramp metering and signalization on I-5, Garden Highway, and West El Camino may be necessary in the future, and CalTrans may seek financial participation from the City for these measures.

Air Resources Board

The EIR needs to address the impacts on the area as it currently exists for the base case analysis. The responsible entities and timeframes for implementing mitigation measures such as road improvements should be identified.

The assumption that 30% of project employees (page F-11) would live in the South Natomas area must be documented or changed to a more realistic figure.

The ARB points out several corrections which are necessary in the air analyses. The air quality analysis used invalid emission factors; the most current EMFAC6C factors are provided for making corrections in the air quality analysis. In addition, the carbon monoxide microscale analysis may have seriously understated the worst case concentrations that could result from the project. The EIR should analyze the project's impacts relative to the 8-hour carbon monoxide standard. The ARB's analysis shows that a violation of the 8-hour standard of 9ppm could result from the project. Other discrepancies exist for vehicle miles traveled and increases in total emissions.

It should be pointed out that the project is not consistent with the Air Quality Management Plan because the AQMP for the South Natomas area assumed only residential development and not industrial. The EIR should address this inconsistency.

Fish and Game

It is recommended that the mitigation measures for the Community Plan EIR and the specific project (page 0-3) be implemented.

State Clearinghouse

In light of the potential adverse impacts of increased pressures to convert additional agricultural land north of I-880, potential deterioration of the downtown central business district, and dramatic and apparently unmitigable traffic impacts, the State Clearinghouse emphasizes the importance of these factors to decisionmakers as they weigh the economic impacts with the environmental and social impacts of the project.

The EIR does not appear to discuss all feasible mitigation measures that could eliminate or reduce impacts to an insignificant level. Increasing the average residential densities in other areas of South Natomas is recommended as a mitigation measure for offsetting housing displacement impacts of the project. However, the EIR itself appears to argue that this is not feasible due to sewer limitations in the area. The proposed roadway improvements associated with I-5 are considered infeasible by CalTrans for several reasons, and the outlook for increased transit opportunities in the area is not good at this time. The State Clearinghouse is especially concerned about the absence of feasible mitigation measures for increased growth pressures on adjacent agricultural lands north of I-880.

In addition, the EIR does point out several feasible mitigation measures for various impacts, but there is no assurance that they will be implemented. The EIR should identify who will be responsible for financing and implementing the proposed measures and these measures should be incorporated into the project design so they will effectively minimize impacts identified in the EIR.

In the area of energy conservation, it should be pointed out that a recent California Attorney General opinion states that a tentative map of a subdivision must be disapproved if it fails to meet the solar design requirements of Government Code Section 66473.1. Additional details regarding this requirement are explained in the attached memo from the Office of Planning and Research. In light of this decision, all feasible

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Cliff Carstens
October 1, 1981
Page Three

passive solar design measures must be incorporated into the project before the tentative map can be approved.

Section 15002(f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. 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 (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

A recent Appellate Court decision in Cleary v. County of Stanislaus clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted and factors of overriding importance warranting an override of the suggestion. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information of any kind. The court further said that the responses must be a good faith, reasoned analysis.

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 Terry Roberts at 916/445-0613 if you have any questions.

Sincerely,

Deanna Wood
for Stephen V. Williamson
State Clearinghouse

Terry Roberts
Terry Roberts
State Clearinghouse

SV:rm
attachments

cc: Ken Fellows, DWR

STATE OF CALIFORNIA
AIR RESOURCES BOARD
1102 Q STREET
P.O. BOX 2815
SACRAMENTO, CA 95812

EDMUND G. BROWN JR., Governor

CITY PLANNING COMMISSION

OCT - 1, 1981
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Date: September 24, 1981

- TO: 1) Jim Burns, Projects Coordinator
Resources Agency
- 2) Cliff Carstens, Senior Planner
City of Sacramento
927-10th Street, Suite 300
Sacramento, CA 95814

Project Title: South Natomas Business Park SCH. NO. 81090405

Project Description:

| Location | Sacramento (AIR BASIN) | Sacramento (COUNTY) | South Natomas (SPECIFIC LOCATION) |
|----------|---------------------------|------------------------|--------------------------------------|
| Impacts | 270 (ACRES) | NA (POP) | NA (DWELLING UNITS) |
| | | | 73,000 (ADT) |
| | | | 1,630,000 (VMT) |

Evaluation of Air Quality Analyses:

| Analysis of: | Adequate | Inadequate | Comment Number |
|---|----------|------------|----------------|
| Environmental Setting | X | | |
| Impact of Project Proposal and Alternatives | | X | 1a & 1b |
| Mitigation Measures for Project Proposal and Alternatives | | X | 2 |
| Cumulative Impacts | X | | |
| Other | | X | 3 |

9

September 24, 1981

COMMENTS:

1a. Overall

The traffic/circulation and air quality sections of the DEIR do not realistically address the potential impacts from the South Natomas Business Park. The analysis assumes that plan-designated improvements have already been completed (i.e., West El Camino Avenue is a 4-lane road with bicycle lanes). These improvements are considered mitigation measures and the EIR should identify both the entity responsible for funding these improvements and a timeframe for implementation to occur. The DEIR needs to address the impacts on the area as it currently exists for the base case analysis.

We agree that the identified optimum plan (residents in South Natomas working in South Natomas) would result in a lesser impact on air quality. However, this appears to be an unrealistic plan. The residents of South Natomas are currently working elsewhere and the probability of transferring their work sites to South Natomas is undocumented. Therefore, the statement on Page F-11, "... 30% of project employees would live in the South Natomas area" needs to be documented or changed to a more realistic figure for addressing the air quality and transportation impacts of the project.

1b. Air Quality

There appears to be a discrepancy between the projected vehicle miles traveled shown in Table 30 (page F-16) and Table 46 (page K-9).

The air quality analyses performed on the proposed project used EMFAC5 emission factors. EMFAC5 factors are no longer valid; the most current emission factors are EMFAC6C. Attached for your information and use are the updated factors to be used in redoing the project's air quality analysis (Attachment 1).

The carbon monoxide microscale analysis contained in the Air Quality Section of the DEIR (page K3 - K5) may have seriously understated the worst case concentrations that could result from the project. The DEIR does not specifically state all the assumptions used in each of the model runs (i.e. temperature, emission factors, traffic volumes, roadway configuration, receptor locations, mixing heights, etc.) thus, we are unable to replicate the analysis. Based upon ARB's worst case assumptions and the use of EMFAC6C emission factors, we modeled substantially higher concentrations than that indicated in the DEIR. Two intersections were examined by our staff: W. El Camino/Natomas Oak Drive and Garden

September 24, 1981

Highway/Natomas Oak Drive (see Attachment 2). The DEIR shows concentrations at these two intersections of 5.5 and 4.2 ppm, respectively, at a wind direction of 270°; ARB's analysis at these sites shows 19.7 and 20.6 ppm, respectively, for 270°. Furthermore, our analysis at 90° wind direction shows readings up to 29.4 and 28.2 ppm, respectively. The EIR needs to include CO modelling using EMFAC6C emission factors and to explicitly state the modelling data and assumptions utilized.

Sacramento has been designated a nonattainment area because of violations of the 8-hour carbon monoxide standard of 9 ppm. The DEIR needs to include an analysis of the project's impact relative to the 8-hour standard. Based on ARB screening calculations, using EPA's Hot Spot Analysis Guidelines, a projected violation of the 8-hour carbon monoxide standard of 9 ppm could be expected to result from the project.

Table 46, (page K-9) indicates a 36% increase in traffic attributable to the project. On page K-7, fourth paragraph, it is indicated that a 28% increase in emissions would result. Based upon the method identified to determine total emissions, vehicle miles traveled x emissions factors = total emissions (page K-6), the statement on page K-7 is inconsistent and underestimates the emission increase. There should be a one-to-one correlation in terms of VMT and total emissions. The DEIR needs to correct or explain this discrepancy.

Table 44, page K-6, addresses the predicted regional mobile source emissions generated under the South Natomas Community Plan (SNCP). In Table 47, page K-10, a comparison of site related emissions with the 1990 Sacramento Air Quality Management Plan is made. However, neither of these two tables contained a quantification of the emissions generated by the project. ARB staff has made an estimate of the emissions resulting from the SNCP area with and without the project utilizing the latest EMFAC6C emission factors. We recommend that this estimate replace Table 44 of the DEIR (Attachment 3) to illustrate the difference in anticipated emissions.

2. The DEIR should address any mitigation measures to offset the projected air quality impacts. Section 15143(c) of the California Environmental Quality Act (CEQA) states that the EIR should include, "...the discussion of mitigation measures shall distinguish between measures which are proposed by project proponents to be included in the project, and other measures that are not included but could reasonably be expected to reduce adverse impacts ... mitigation measures which will eliminate such impacts or reduce them to a level of insignificance (emphasis added)."

Memorandum

UW1 - 1081

RECEIVED

Mr. Burns
Mr. Carstens

-4-

September 24, 1981

To : Ann Barkley, Chief
Division of Transportation Planning
Attention Darrell HusumDate: September 25, 1981
File : 03-Sac-5
South Natomas
Business Parks EIR
SCH 81090406From : DEPARTMENT OF TRANSPORTATION
District 03

Subject :

3. The DEIR, page K-7, states, "Sacramento Area Council of Governments (SACOG) has stated that development and corresponding emissions from the South Natomas area were included in the projected growth for the Sacramento Air Quality Management Plan (AQMP)." This statement is partially correct, the SACOG has included the South Natomas area in its air quality analysis for the 1982 plan. The assumptions that were made were based upon residential development and not light industry as proposed. Therefore, this project is not consistent with the AQMP and the DEIR needs to address this inconsistency.

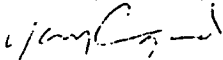
ARB requests notification of future hearings/workshops.

Yes ☒ No ☐

ARB requests final EIR for review.

Yes ☒ No ☐Reviewed by Sue Scott (916) 322-3806
(NAME) (TELEPHONE NUMBER)

Sincerely,

Gary Agid, Chief
Local Project Support Branch

Attachment

cc: B. Cofer, Sacramento County APCD
G. Stonehouse, SACOG

District 03 has reviewed the draft EIR for the South Natomas Business Parks, which include the Natomas Eastside and the Gateway Centre projects. These proposals would combine office, commercial, residential, and open space land uses and are located west of Interstate 5 between Garden Highway and Interstate 880.

We strongly disagree with the conclusion stated in Item 2 on page F-15 that "the levels of service on roadways outside of the project area are not expected to be lowered as a result of this project." At this time, traffic on southbound Interstate 5 in the morning peak is reported to be critical at the core area off-ramps, specifically the "J" and "Q" Streets ramps. A new, southbound on-ramp at Garden Highway and Interstate 5 has been suggested by project proponents. This ramp is not considered feasible because it would increase morning congestion at the "J" and "Q" Streets off-ramps, which are the only available access ramps to the downtown area. This impact should be addressed. Excessive expense and weaving problems present additional concerns over the suggested ramp.

Other mitigation measures have been proposed on pages F-16 and F-17 which involve various modifications to the West El Camino Overcrossing structure and interchange ramps. We have expressed concern about these and other issues in the District's letter of August 25, 1981, to Mr. Cliff Carstens of the City's Planning staff. This letter is attached as part of our review of the EIR.

If the City of Sacramento decides to rezone the area as needed to allow the proposed business parks, then steps should be taken to further improve transit service to the area. Requirements for bus passes, car and van pooling programs and provision of flexible work hours would also help reduce anticipated congestion levels.

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Ann Barkley
Attn. Darrell Husum
Page 2
September 25, 1981

As stated in the attached letter, it is encouraged that new employment centers be located to take advantage of light rail transit, and discouraged in other areas. Particularly, it is recommended that business offices not be placed on productive agricultural land.

LEO J. TROMBATORE
District Director of Transportation

By *R.D. Skidmore*
R. D. Skidmore
Chief, Environmental Branch

Attach.

SEP 30 1981

Mr. Cliff Carstens, Senior Planner
City of Sacramento
Sacramento City Planning Department
927 Tenth Street, Suite 300
Sacramento, CA 95814

Dear Mr. Carstens:

The staff for The Reclamation Board has reviewed the Draft EIR for the South Hatoma Business Park project in Sacramento (SCR No. S1090706), and has the following comments.

The Hatoma Main Drainage Canal is under the jurisdiction of Reclamation District 1000 and, therefore, no application for Approval of Plans is required from The Reclamation Board for the drainage facilities planned for Hatoma Eastside.

Not enough information about the drainage plans for Gateway Center is available to comment on at this time. At some point in the future, the increased runoff from these two projects may necessitate the construction of larger and/or additional pumps and pipes in order to discharge the drainage from Hatoma Main Drainage Canal into the Sacramento River. These facilities may encroach on Project levees or other areas under the jurisdiction of The Reclamation Board requiring an approved application from the Board before start of construction.

For application information the project proponent should contact Mr. Ted Allen, Encroachment Control Section, Department of Water Resources, Room 335, 1415 Ninth Street, Sacramento, CA 95814, telephone (916) 445-9225.

Sincerely,

Original signed by
Edson E. Rensenhart

EDSON E. RENSENHART
General Manager

cc: Ted Allen
Ken Fellows w/attachment

Affronsen:rv

11

League of Women Voters of Sacramento

2200 K Street, Suite 2 • Sacramento, Ca 95816 • 443-3678

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Page 2

at an added cost to the city.

While the League believes that economic diversity is necessary for Sacramento in the coming years, it cannot support the development of the South Natomas Business Parks.

We appreciate the opportunity that you have given us to express our views on this matter.

Sincerely,

Lois Hoodruff
Lois Hoodruff
President

LW/EH

September 30, 1981

City Planning Department
927 10th Street, Suite 300
Sacramento, CA 95814

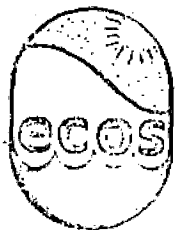
To the Planning Staff:

Subject: Draft EIR for South Natomas Business Parks Proposals

The League of Women Voters of Sacramento, after reviewing the draft EIR, has concerns over four areas of environmental impact which the proposed business parks will have.

1. The business parks proposals alter designated land uses without regard to planned goals and objectives for the area. The proposals require the alteration of the city's General Plan, the South Natomas Community Plan, and the zoning in effect from the Natomas Oaks PUD. The League is a supporter of the use of general plans and community plans when making land use decisions.
2. The business parks will put increased pressure to develop the North Natomas agricultural/urban reserve and agriculture zoned areas. The League is a supporter of agricultural land preservation. The proposed impacts on the loss of productive agricultural land in the North Natomas area are not adequately addressed in this EIR.
3. The League is concerned with the transportation and air quality aspects of the project. The use of I-5 and I-880 as an alternative to I-80 into downtown Sacramento is increasing. The proposed parks will seriously add to the congestion at this interchange. The number of projected employees and trips will seriously impact air quality in the Sacramento area. Have the developers met with Regional Transit representatives to plan transit corridors, and the rerouting of existing routes to serve employees in the proposed parks? Transportation alternatives to the automobile must be stressed in this development.
4. The last comment has to deal with the employment projections. With the cutbacks in the federal job training programs, how will the unemployed in the north area receive the training that they will need in order to qualify for the jobs? Will all of the companies coming into the proposed parks have training programs or will the companies choose to import trained workers from outside of Sacramento to fill their needs? We are concerned that the unemployment in Sacramento will not drop, and that the unemployed in the north area will not benefit from the proposed parks. The imported workers will require additional housing and services

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ENVIRONMENTAL COUNCIL OF SACRAMENTO

**909 12th Street
Sacramento, California 95814**

October 1, 1981

CITY PLANNING COMMISSION

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Sacramento City Planning
Commission
City Hall
Sacramento, CA 95814

RE: South Natomas Business Parks EIR

Dear Commissioners:

The Environmental Council of Sacramento (ECOS) appreciates this opportunity to comment on the Gateway Environmental Impact Report (EIR).

We have examined the draft EIR for the South Natomas Business Parks, prepared by Wagstaff and Brady. It contains a great deal of information regarding current, projected and proposed conditions in the vicinity of the proposed projects. At this time, we wish to address only a small number of critical points:

1. Continuity and Reliability

The current land use plan for the area was adopted only three years ago. It called for medium density residential use, transit orientation, with just enough commercial uses to serve residents. Many, if not most, of the people who have moved to the South Natomas area have done so seeking the sort of environment promised by this plan.

We believe that circumstances have not changed greatly in the last three years, and what was deemed correct for South Natomas then is correct today. We believe it is a major breach of faith with the area's residents to make a major alteration in the plan.

2. Weakening the Downtown

One of the major efforts of city government in recent years has been to strengthen the downtown area. Convenient residential areas in the South Natomas area will do just that. Office space will compete with existing and potential new office development

Member Organizations

Audubon Society
Bikeways Action Committee
California Park & Recreation Society, Div. II
Caring Information Center
League of Women Voters
Long Association
Planned Parenthood

Sacramento Farm Bureau
Modern Transit Society
Sacramento Old City Association
Save the American River Association
Serra Club
Zero Population Growth

Sacramento City Planning Commission

October 1, 1981

Page 2

downtown. The developer contends his occupants will not want to be downtown, or will not need to. We believe attractive offices of this sort can be developed in the north downtown area, as well as other areas already properly zoned for such development. There is no need to breach the residential zoning for these developments.

3. Traffic Congestion

Should either or both developments be permitted, there is no way to accommodate the traffic that will be generated. The interchange at I-5 and West El Camino is hopelessly inadequate and can never be made a four-way intersection. As a result, feeder streets in the area, intended for residential use without business-hour peaking, will become congested and dangerous. The document's comments about staggered work hours at the development are empty talk, as they cannot be required or enforced. These developments will simply make a traffic mess that is unwanted and not needed.

If there is a demand for such developments, we urge that they be placed elsewhere in the City or the larger metropolitan area. We believe the north part of downtown is a suitable location for additional office space, even of the "campus" type. There are undoubtedly other areas scattered throughout the City, as can be pointed out by the planning staff. Other locations would share the wealth so to speak, among other districts, making the new jobs conveniently available to all City residents.

We urge that the City Planning Commission deny any and all approvals relating to this project.

Sincerely,

Tina A. Thomas
President

13

MORRISON HOMES

4441 AUGUSTIN BLVD., SUITE P • SACRAMENTO, CALIFORNIA 95841 • (916) 405-2031

CITY PLANNING COMMISSION

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City of Sacramento
Planning Department
October 1, 1981
Page Two

October 1, 1981

City of Sacramento
Planning Department
927 - 10th Street, Suite 300
Sacramento, California 95814

Attention: Cliff Carstens, Senior Planner

Re: Draft EIR for South Natomas Business Park Proposals

Gentlemen:

Morrison Homes, as owner of that portion of the real property known as the Natomas Oaks PUD lying West of Gateway Oaks Drive, has received and reviewed the subject Draft EIR, dated August, 1981.

In conjunction with a series of issues raised, we wish to comment on a few which interrelate with our proposed development.

Gateway Centre EIR

The summary of findings states that potentials for land use conflict would be created between the proposed office-commercial activities and future residential development (Natomas Oaks) to the West. With the 90' wide Gateway Oaks Drive collector street and the proposed landscaped buffer between Gateway Oaks Drive and the proposed office buildings, opportunity exists to minimize this potential land use conflict. Morrison Homes has already discussed with the City of Sacramento Planning Staff our concept of the cluster housing area and our preliminary design incorporates a wall and/or berm and back-up treatment at the collector street in order to minimize the impact of office-commercial land uses.

The multi-family parcel at the Northern portion of the property has not been subject to any design efforts as of this date, however, design elements can be incorporated into the plan to interrelate multi-family land use to office use in Natomas Eastside to the North and Gateway Centre to the East.

There is no question that if the current proposals are approved, pressure would increase for higher density in the remaining residential areas, replacing extensive single-family designations with more townhouses, cluster and multi-family designations. A commitment, however, has been made to a substantial portion of the remaining residential property by the preparation of final maps and improvement plans for 137 single-family detached lots, located at the Southerly end of Natomas Oaks. The final map for Unit 1, consisting of 92 lots, is ready to record and final improvement plans have been approved by the City Engineering Department. The plans for Unit 2, consisting of 45 single-family lots, have been completed and initial review has taken place by the City Engineering Department. Because of Morrison Homes' commitment to Units 1 and 2, as well as the current design effort for the cluster units, should office and commercial use be approved, a careful analysis will be made as to transition to higher density concepts for the remaining portion of the approved residentially zoned property West of Gateway Oaks Drive and South of proposed Natomas Eastside.

It is likely that the single-family lots North of Units 1 and 2 will be re-analyzed as a result of office and commercial land use approvals and it is possible that during this replanning process, the viability of higher density may be studied. In any event, even if the choice is made to continue to process the approved single-family lot land use, the plan reflects that only four single-family lots side on to Gateway Oaks Drive. Further, these lots have the ability to accommodate duplexes pursuant to the approved tentative map of Natomas Oaks. We feel confident that these lots can be shielded from the impact of office uses. In addition, the eight duplex lots fronting on a loop street off of Gateway Oaks Drive can be effectively buffered through means of the landscape strip provided between Gateway Oaks Drive and the proposed loop street.

Increased traffic noise on Gateway Oaks Drive can be mitigated through the use of walls, berms or a combination thereof. Our current design efforts for the cluster housing units incorporate such a wall/landscaping amenity. Further, we intend to restrict the cluster units to single-story units in order to maximize privacy and minimize the effect of office-commercial activity beyond the 40' landscape buffer proposed by applicant.

We feel that the proximity of office-commercial to residential land uses may be a factor in actually reducing the amount of traffic generated in that it will provide an opportunity for people to live close to where they work and consequently not have to depend on the automobile for primary transportation to and from work. Further, traffic at key intersections will be traveling in two directions rather than all in one direction at peak commute time.

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City of Sacramento
Planning Department
October 1, 1981
Page Three



CITY OF SACRAMENTO

CITY PLANNING COMMISSION

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An additional issue is the visual and sound impact of I-5 on future residential land uses. A Condition of Approval of the Natomas Oaks PUD called for the installation of a sound attenuation wall along I-5. I-5 corridor noise barrier criteria was developed to protect residential uses from freeway noise and visual intrusion. It is acknowledged that the barrier requirement would be less appropriate for proposed office-commercial uses, however, consideration needs to be given to shielding not only the noise factors but also the visual intrusion of I-5 into the residential areas of Natomas Oaks and while it is realized that the buildings proposed for the office land use will play an important part in shielding the freeway, additional mitigating measures such as walls, berms or dense landscaping should be considered.

It is felt that negative impact of the proposed office-business park can ultimately be minimal if a number of mitigation measures are taken at the design and approval stage of the proposed application areas. Morrison Homes believes that the various land uses can be blended together harmoniously to provide a community where these uses complement one another rather than conflict with each other.

Very truly yours,

HERMAN J. TIJSSELING, JR.
Development Manager

HJT:jj

cc: Lee Sammis Co.

TRAFFIC ENGINEERING DIVISION
1023 J STREET - SUITE 202 SACRAMENTO, CALIF. 95811

TELEPHONE 810
TRAFFIC ENGINEERING 449-5707
OFF-STREET PARKING 449-5354
ON-STREET PARKING 449-5644

September 30, 1981

MEMO TO: CLIF CARSTENS, SENIOR PLANNER
FROM: JIM BLOODGOOD, ASSISTANT CIVIL ENGINEER
SUBJECT: COMMENTS ON S.N.C.P. D.E.I.R.

Page F-1 - Local Street System
Natomas Oaks Drive has been completed from Garden Highway to approximately 600' south of W. El Camino Avenue. The connection between Garden Highway and W. El Camino does not exist.

Page F-2 - Figure 11 indicates that W. El Camino Avenue will ultimately be developed to a six-lane facility. Under base case assumptions in "Planned Roadway Improvements," on Page F-1, W. El Camino is indicated to be a four-lane facility with bike lanes. The four-lane configuration is consistent with the community plan.

Page F-3 - Transit Service
It is our recommendation that transit usage might ultimately be 6% during the peak periods and 2% overall.

With the adoption of Light Rail as the preferred alternative for the I-80 bypass funds, Regional Transit has indicated that an 11% reduction in existing bus service throughout the community can be expected. In addition, a September 23, 1981, article in the Sacramento Bee titled "S. Natomas Bus Future is Dim," indicates a new bus line in South Natomas is experiencing a severe lack of patronage and may be discontinued.

With these in consideration, stating that 6% transit use is "very conservative" and "worse case" seems unsubstantiated and unrealistically optimistic.

Page F-4 - Table 24
Trip Generation values do not correspond to Land Use Values given in S.N.C.P. This can be very important if these values were used to determine levels of service for S.N.C.P. and comparisons to proposed alternatives.

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September 30, 1981

Page F-8 - Table 26

For Level of Service F, an indication of +100% capacity is misleading. At Level of Service F, traffic flow is constricted and volume is reduced from theoretical capacity at Level of Service E. "Not Meaningful" would be a better indication of Level of Service F.

Page F-9 - Project Impacts

Methodology and Assumptions are found in Appendix G, not Appendix A. Adjustment factors for bus delay, lane utilization, pedestrian conflicts, etc., are not given in this appendix.

Page F-9 - Project Effects

It is the City of Sacramento's experience that peak hour traffic volumes roughly approximate 10% of the ADT. The values shown are extremely small (in the neighborhood of 4-7%) in comparison to the ADTs indicated.

Also, Table 27 does not clearly indicate increases of 187% and 56% in p.m., peak hour volumes as stated.

Page F-10 - Table 11

ADT from Table 24 is being used for comparison for traffic increases attributable to projects (see previous comments).

Page F-11 - Regional Analysis

A 30% employee population in South Natomas seems extremely high, which can unrealistically raise the level of service at critical intersections.

Page F-15 - Regional Analysis

W. El Camino and Northgate and W. El Camino and Truxel are two intersections in the region which could be significantly affected by traffic increases attributable to the proposed projects.

Pages F-6, F-7, F-14, F-15 - Figures 12 - 15

Detailed information regarding turning movements and through traffic at major intersections should be shown as well as volumes on freeway ramps.

Figure 14 shows a 140 vehicle change in traffic volumes by merely crossing a drainage canal. This seems highly unlikely without intersecting streets.

Figure 15 (with projects) shows Garden Highway eastbound between Natomas Oak Drive and I-5 to have a p.m., peak volume of 205.

Figure 13 (without projects) indicates a volume of 1420 for the same location. These volumes need to be re-evaluated.

September 30, 1981

Mitigation Measures

Pages F-16 to F-18

(a) Natomas Oaks Drive/W. El Camino Avenue Intersection Improvement

The additional travel and turning lanes will require additional land from the proposed projects and increase major street costs. In addition, this will require the widening of the W. El Camino Avenue Overcrossing.

(b) I-5 Northbound Off-Ramp and W. El Camino Avenue Interchange

This will require the widening of the W. El Camino Overpass at I-5. It may be found that this can only occur on the south side of the structure due to existing development on the northeast corner of the quadrant. Widening on the south side only will require the off-ramp from I-5 to begin further south, thus affecting the weaving area of the northbound Garden Highway/I-5 on-ramp and this ramp.

(c) Natomas Oaks Drive/Garden Highway Intersection Improvements

Additional right of way will be required for Garden Highway and may require the widening of the levee which would be extremely costly.

(d) I-5 Southbound Off-Ramp/Garden Highway Improvements

Improvements of this type require massive amounts of capital and, even then, may not meet state standards for handling freeway merging and weaving requirements.

(e) Comprehensive South Natomas Capital Improvement Program

It seems that this is in conflict with earlier statements indicating that the proposed projects would not affect regional circulation. We agree that financing of the above measures will be complex and difficult and must be resolved prior to action on these projects.

(f) Flex-Time or Shortened Work Weeks

Enforcement of such a measure by the local government agencies seriously compromises the viability of such a condition. It is considered a very weak mitigating measure due to lack of concrete evidence indicating its success.

General Comments on Financing Mitigation Measures

Pages F-16 to F-18

Many of the measures required to increase levels of service at critical intersection to "C" or better are extremely expensive and somewhat vague in description. For example, what are the limits of the proposed widening of Garden Highway as described in Item C on Page F-17, and what cost is associated with the levee widening? A more detailed description of additional right-of-way takes is required to give a better idea of improvements required.

September 30, 1951

If these funds are not adequate, an Assessment District would be required which would necessitate the development of cost/benefit ratios for very broad-reaching improvements, such as freeway interchange improvements and levee widening. With today's interest rates, Assessment Districts of the magnitudes required to construct some of these street improvements would be very difficult to form.

JHB/mf
cc: John Varozza

Received Oct. 1, 1981

OUR FILE NO. _____

John V. Diepenbrock

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TRAFFIC AND CIRCULATION

The Traffic and Circulation section of the Draft EIR has been reviewed by JHK & Associates, an international traffic engineering consulting firm, who also have prepared a comprehensive analysis of the Gateway Centre project, the Natomas East Side project, the South Natomas Community Plan, and the alternatives set forth by the City. Attached is a copy of JHK's analysis and review of the Traffic and Circulation section. Although this review was prepared without benefit of the base data and certain of the Draft EIR assumption, a number of discrepancies have been found in the Draft EIR.

Additionally, the Draft EIR has not paid sufficient heed to the mitigations available through transportation system management ("TSM"). Thus and with particular reference to JHK's citation of the Orange County findings of a 35% reduction in peak hour trips as a result of TSM techniques, it should be noted that TSM can raise an F level of service to an A or B level and can, therefore, be a major if not a complete mitigation of potential traffic congestion here. The Orange County findings appear to be validated by the Draft EIR reference (at p. F17) to a potential 50-60% reduction in office peak hour trips via an effective TSM.

For additional information in respect to TSM and to provide some insights as to the real world validity of the "Worst Case" approach used by both consultants, we also include herewith Section 5 of the complete JHK Technical Report of August 1981, a copy of which is on file with the

Planning Department.

Lastly, we include a copy of the August 1981 JHK Summary Report dated August 1981 and for anyone having a real interest in the traffic issue we recommend a review of the complete JHK Technical Report.

IMPACT OF GATEWAY CENTRE ON THE CBD

In the past, and particularly at the time of the adoption of the South Natomas Community Plan, fears were expressed that large-scale office development on the Gateway Centre site would distract from redevelopment efforts in the CBD and it was primarily because of these fears that the City Council zoned the Gateway Centre site for residential rather than office use.

Today, as the attached letter from Mr. Thomas C. Aguer forcefully states, the CBD is very much alive and well, with a vacancy rate of approximately 2%, and with handsome new buildings "coming on line" which will permit those CBD tenants who require expansion space to expand within the CBD.

The Draft EIR itself acknowledges that any negative impact of the Gateway Centre project on the CBD is highly speculative (see p. H-16). As we have stated many times, Gateway Centre is not in competition with the CBD -- Gateway Centre seeks large corporate users who have a unique need for large-scale sites, immediate freeway access and a highly visible location and who would not, under any circumstances, locate in the CBD. As indicated by Mr. Aguer, they would prefer Fresno to downtown. The appropriateness of the Gateway Centre site for such users, and the increasing need for Sacramento to broaden its economic base and reduce its reliance on government for its economic base is documented in the Draft EIR as well as in Employment Analysis prepared by the Business Services Bureau of the California State University, Sacramento.

NOTE:

August 1981 JHK Summary Report and complete JHK Technical Report available for public review at the Sacramento City Planning Department.

VISUAL AND OTHER DESIGN FACTORS

Approval of Gateway Centre will, without question, result in a significantly more attractive "gateway" into Sacramento than will residential development. A landscaped, open space corridor along the west side of I-5 will be installed promptly, at developer expense; an unsightly sound wall can be eliminated and the handsome, extensively landscaped buildings proposed will create an impressive entrance into the City. We cannot concur with the EIR consultants, who postulate, subjectively, that the proposed projects would "create a visual intrusion on the freeway," subject project employees to "distracting views of the freeway" and that an undulating noise wall is preferable to landscaped berms.

We are also surprised that the EIR consultant failed to address the significant planning issue about the wisdom of locating peoples' homes next to major freeways. One of the soundest reasons for amending the South Natomas Community Plan is that it was just not good planning in the first place to put homes next to I-5. There is little to be said in favor of subjecting people to freeway noise and car exhaust.

PLAN CONFORMITY

The Draft EIR assesses the relationship of the project to the City General Plan, South Natomas Community Plan, and other City policies. In its analysis relative to the General Plan, the Draft EIR indicates that in only one instance is the plan "potentially nonconforming;" that is, the proposed land use mix may create a concentration of financial activity outside the CBD. Considering Proposition 13 and the decline in state government employment, it is The Lee Sammis Company's contention that the project will provide an economic infusion into the Sacramento metropolitan area which will not only provide additional market support for the CBD retail activities but also for the office activities in the CBD. The project itself is designed for large-scale corporate users and not for the typical CBD tenant, and therefore, is geared toward attracting a different segment of the market place. We believe this addition and diversification in the economic base will, in fact, increase the demand for multiple tenant downtown-oriented office users.

As the project relates to the South Natomas Community Plan, the projects contemplate a change in the land use designation of a very small segment of the Community Plan to allow the office development of Gateway Centre. It is The Lee Sammis Company's contention that the change in the land use plan -- essentially a pre-Proposition 13 plan -- is necessary to reflect the existing realities in an ever-changing world. The change in the plan enables the City of Sacramento to respond to current-day needs and yet allows the South Natomas Community Plan to continue

to function as a primarily residential area. As indicated in the Draft EIR, the proposed project would not have a significant adverse impact on the ability of the South Natomas Community Plan to function as a close-in residential community serving the CBD.

Finally, The Lee Sammis Company believes the Gateway Centre project is in full accord with City of Sacramento General Plan policies, particularly those cited below:

a. "The City recognizes that its future growth is dynamic, affecting the urban growth outside its boundaries as well as being affected internally by external growth forces. It believes that a healthy, attractive environment now and for future generations to enjoy requires considerable effort directed at programs and policies for implementation which address themselves both to the existing urban fabric and to the growth aspects normally associated with expansion. The overriding goal is therefore to improve and conserve existing urban development and, at the same time, encourage and promote quality growth in expanding areas of the City."

b. "Promote the distinctive character and identity of the City in a manner which is compatible with the larger metropolitan area of which it is a part."

c. "Develop a strong, diversified economic base and provide for the orderly distribution of employment and other economic opportunities."

d. "Protect and promote viable, self-containing residential and commercial neighborhoods." 1/

1/ "The General Plan for Sacramento, California", August, 1974, pps. 1-3 and 1-4.

LEE SAMMIS COMPANY COMMENTS -
SOUTH NATOMAS BUSINESS PARKS DRAFT EIR

The Lee Sammis Company and its various consultants have reviewed the Draft EIR in detail. While we believe (subject to the exceptions elsewhere noted) that the overall document adequately assesses many of the potential environmental impacts, the Summary of Findings and the Summary of Impacts do not summarize fairly or accurately the findings set forth in the text. We are also concerned that the Summary of Findings lists as "unavoidable and irreversible adverse impacts," impacts which do not properly fall in that category. Specific examples are as follows:

A. Summary of Findings.

(1) The Summary (p. C-2) notes a potential demand for additional housing units to meet the needs of "new" job holders yet fails to include the EIR finding that this need can be met by increasing densities and/or developing 600 to 1,600 additional acres of residential land (p. E-23).

(2) The Summary (p. C-2) affirms that the projects would have a positive impact on annual City revenues but does not mention the \$1,750,000 one-time increase in revenue to the City from increased construction excise taxes, building permit fees, and sewer connection fees (p. G-8) and the \$580,000 reduction in capital expenditures which result in a one-time net gain to the City of \$2,328,000 (p. G-11).

(3) The Summary (p. C-2) states that "[A]dded interest would be drawn to the Natomas area for. . .the conversion of additional agricultural lands to urban uses", but does not qualify this statement with a reference to p. B-15, where the EIR points out that business park development in South Natomas might result in "less pressure for similar office intensive projects in the North Natomas Airport areas." Moreover, the Draft EIR notes that housing units displaced by the projects can be "accommodated as infill . . . within the metropolitan area" (p. E-21) and thus would not necessitate conversion of additional agricultural land.

(4) The Summary (p. C-3) cites as unavoidable and irreversible adverse impacts of the projects that they might result in a decline in development in the CBD which could result in a slower absorption rate and lower CBD rentals and which might retard development of North Natomas business park projects. By contrast, the text points out (pps. B-15-16) that (i) the major impact of the South Natomas projects would probably be on other suburban office parks, (ii) that potential impact on the CBD is less clear than impact on other suburban office parks and (iii) that the CBD office space market "may already be established and comfortably occupied" by the time there is substantial activity at the projects. Moreover, the EIR consultants' implied finding that a decline in feasibility of similar business park projects in the North Natomas area and a possible decline in "rental potential" in the CBD constitute "unavoidable and irreversible adverse impacts" of the projects is a subjective judgment out of place in an EIR.

(5) The Summary (p. C-3) cites an increase in project-generated emissions as unavoidable and adverse impacts, yet points out at the same time that the projects would meet all state and federal standards. More properly, the projects' impact on air resources should be classified as a "not significant effect."

(6) The projects' impact on water quality is listed as being a notable long-term adverse change, as well as having a not significant effect (p. C-4).

B. Summary of Impacts and Mitigations.

Table 2 (Summary of Impacts and Mitigations) summarizes the projects' impacts on the environment, but fails to distinguish between (i) those impacts which are purely beneficial, e.g., construction employment effects, fiscal impacts, potential positive impact on diversification of the Sacramento area employment base, etc., (ii) those which the consultant believes create a significant effect on the environment, i.e., a substantial or potentially substantial adverse effect on the environment by CEQA definition, and (iii) those which have an impact on the environment which is neither purely beneficial nor sufficiently adverse to be treated as a "significant effect" under CEQA.

Mitigation measures by definition (See 14 Cal. Admin. Code §§ 15032.5, 15085.5 and 15088) are those measures which may be taken to lessen a substantial or potentially substantial adverse impact on the environment. However, no mitigation measures are necessary or appropriate unless a significant, (i.e., adverse) impact has been identified. Table 2, however, lists mitigation measures for impacts which are not adverse, such

as the projects' impact on employment in general, and potential to create "new" jobs. Table 2 also lists mitigation measures for impacts which the Draft EIR text indicates have only a remote or highly speculative potential to have an adverse effect on the environment, such as the projects' remote potential impact on CBD absorption rates and rental rates.

Specific comments on the text of the Draft EIR are as follows:

A. LAND USE

1. Comparable Business Park Areas (p. D-1). The Draft EIR lists as "comparable business parks", development sites which are industrial in character. The "Economic Growth & Business Park Demand" section correctly distinguishes between industrial and office park development.

2. Metropolitan Land Use Pattern (p. D-5). The Draft EIR states that:

"Approval of the project and construction of related infrastructure improvements would generate additional interest in further development and intensification of designated Natomas urban areas, and in the conversion of more Natomas area agricultural lands to suburban uses."

We observe that both project sites are currently slated for development under the South Natomas Community Plan and installation of infrastructure will occur whether the sites are used for homes or for business parks. Moreover, given market forces, pressures for development of additional business parks in the Natomas area lands should not increase, as acknowledged on page H-15 of the Draft EIR which states that the projects might result in "... less pressure for similar office-intensive

projects in the North Natomas-Airport areas, at least within the decade. . . ." The Draft EIR notes also that housing units displaced by the projects can be accommodated as infill (p. E-21) and thus would not need to be placed on North Natomas agricultural land.

3. Effects on Site and Vicinity Land Use (pps. D-6, D-9).

The Draft EIR states that approval of the projects will result in additional applications to change current land use policy and will result in higher densities on remaining residential areas. The possibility of additional applications is speculative; any increased densities would be in keeping with the Community Plan land use designation and would not exceed those densities already anticipated in the Plan.

As to making Garden Highway a four-lane road between I-5 and Orchard Lane, The Lee Sammis Company has never proposed this. We do, however, propose to divide the existing four-lane section between I-5 and Natomas Oaks to provide better turning access, but Garden Highway west of Natomas Oaks Drive will remain "as is."

4. Relationship of Proposed Land Use Changes to Local Policies and Regulations (p. D-9).

The Draft EIR lists those City General Plan Policies which it considers "most relevant" to the projects. The Lee Sammis Company believes, however, that the General Plan policies cited below are the most applicable to Gateway Centre:

a. "The City recognizes that its future growth is dynamic, affecting the urban growth outside its boundaries as well as being affected internally by external growth forces. It believes that a healthy, attractive environ-

ment now and for future generations to enjoy requires considerable effort directed at programs and policies for implementation which address themselves both to the existing urban fabric and to the growth aspects normally associated with expansion. The overriding goal is therefore to improve and conserve existing urban development and, at the same time, encourage and promote quality growth in expanding areas of the City."

b. "Promote the distinctive character and identity of the City in a manner which is compatible with the larger metropolitan area of which it is a part."

c. "Develop a strong, diversified economic base and provide for the orderly distribution of employment and other economic opportunities."

d. "Protect and promote viable, self-containing residential and commercial neighborhoods." ^{1/}

Moreover, development of the proposed project will provide an economic infusion into the Sacramento market which will not only provide additional market support for the CBD retail activities but also for the office activities in the CBD. The project itself is designed for large-scale corporate users and not for the typical CBD tenant. As the Draft EIR itself indicates, the proposed projects "... are directed toward corporate offices of regional significance ("basic" employers) rather than the community-serving office uses. . ." (page D-10).

5. SNCP Policy Relationships (D-14).

The Draft EIR states that the projects are nonconforming to the SNCP objective of prohibiting "intrusion of incompatible land uses and disruptive traffic into new and existing residential

^{1/} "The General Plan for Sacramento, California", August, 1974, pps. 1-3 and 1-4.

areas", and that

"[T]he applicant has not submitted market studies justifying the demand for 3.4 million square feet of additional office space, roughly 30% of the projected 1980-1990 increase over existing and approved office space in the metropolitan area and that therefore, the projects do not conform to SNCP goals."

First, offices and residential development can and do co-exist harmoniously. Adjacent townhouses along Natomas Oaks Drive have been carefully designed with inward orientations in order to prevent any possible intrusion. Further, project approval will not substantially increase the number of average daily trips over those resulting from dense residential development, and evening and weekend project-related traffic will be minimal to nonexistent.

As to market demand, The Lee Sammis Company has in fact submitted a market study by Reel/Grobman and Associates establishing a demand for the Gateway Centre project. Gateway Centre is designed for an office use not presently existing in the Sacramento area, and thus analysis and projection based on analysis of past absorption rates is inappropriate. Moreover, the Draft EIR itself indicates that the proposed action is feasible in the real estate sense, in an economic sense, and that the site is a suitable site for business parks (pp. H-13-14).

6. Sacramento Central City Community Plan (p. D-15).

The Draft EIR states that the projects are potentially non-conforming with the SCCP policy to "continue revitalization of the CBD as a major regional commercial center".

On the contrary, the projects will complement the CBD. Those CBD office users oriented to City, State and County

government offices are unlikely to relocate. Moreover, given that state expansion is non-existing and in fact declining in some instances, demand for office space in the CBD could decline unless there is an economic infusion into the greater Sacramento region. The large suburban office users at Gateway Centre would provide "basic" employment, diversify the economic base, and help ensure the vitality of the CBD. Hence, we believe the development is very much in conformance with the goal of revitalizing the CBD.

7. Land Use Mitigation Measures (p. D-23).

The Draft EIR suggests that

"[T]o reduce land use conflicts between future Natomas Oaks residential uses along Natomas Oaks Drive and Gateway Centre office and commercial uses, orient Natomas Oaks residential uses internally (away from the route and Gateway Centre) and require new residential development to include a landscape buffer along the westside of Natomas Oaks Drive, similar to the proposed Gateway Centre edge . . . six story structures should be clustered towards the center of the two projects . . ."

Based on recent meetings between The Lee Sammis Company and Morrison Homes, owners of the residential property to the west of Natomas Oaks Drive, there appears to be excellent land use transition between Gateway Centre and the Morrison Homes development. Gateway Centre will restrict building heights to a maximum of two stories along the Natomas Oaks collector street and will include a 40 foot landscape buffer on the eastside of Natomas Oaks Drive. Gateway Centre buildings have purposely been located on the site so that they gradually increase in height, with maximum heights along the freeway where they will have the least impact on adjacent residential neighborhoods. The Morrison plans include landscape setback, inward orientation of development,

and zero lot line walls facing eastward toward Gateway Centre, all of which make a suitable land use transition. The single family and duplex portions of the Morrison development have a minimum number of lots which side on Natomas Oaks Drive and present planning provides for ample setbacks and landscaping. Additionally, as part of the planning process, the Planning Commission and Council will review not only the schematic of the Gateway Centre overall development plan, but also each individual building design as development occurs.

B. POPULATION, HOUSING, AND EMPLOYMENT

1. Need for Diversification of Employment Base (p. E-11).

The Draft EIR notes that

"the Sacramento area has been particularly dependent upon government employment as the 'basic' or growth-inducing sector. Over one-third of the region's employment is in government (as compared with 20% statewide). Recent reductions in rates of local, state, and federal job growth suggests future worsening of the SMSA unemployment rate, and indicate a significant need for increased diversification of the area's employment base."

In this regard, an extensive analysis prepared at the request of The Lee Sammis Company by the Business Services Bureau of California State University at Sacramento reveals an excellent job match between the job skills of Sacramento-area unemployed and the employment needs of Gateway Centre employers. Gateway Centre will produce approximately 6,000 jobs on-site, additional 8,000 secondary jobs for supporting and services businesses, and the combined projects will create 5,750 person-years of construction employment versus 2,150 person-years for residential development (p. E-16).

2. Direct Effects: Construction Values Translation

(p. E-15).

The Draft EIR estimates that the construction valuation of the two development proposals is roughly \$275 million. We believe that the construction valuation figure is low and should be adjusted upwards to reflect estimated assessed values of the buildings at time of completion of construction over the 7-10 year project buildout.

3. Net Additional Jobs (p. E-22).

The Draft EIR states that under a "worst case" analysis, 30 to 45 percent of project-related jobs would be net additional Sacramento jobs. We suggest that this possible result should be viewed favorably by policy makers. However, given that government employment is declining, and given pressures for further reductions in government employment, project approval will not necessarily result in unprojected Sacramento-area growth, but may merely replace growth presently projected for the public sector.

4. Mitigation Measures (p. E-24).

Inclusion of mitigation measures to offset the "housing displacement" seems contrary to the conclusion at p. E-21 which states that:

"it is likely that from 350 to all 1,800 of the displaced units (assuming construction of both projects) would then be accommodated as infill within land allocated for new housing elsewhere in the metropolitan area. Given the apparent availability of sufficient buildable land apart from South Natomas within the metropolitan area, the addition of up to 1,800 units from the project site should not have a significant adverse impact on the regional supply of housing."

Also, given that most if not all of the 1,800 units displaced will be accommodated in the metropolitan area, there should be no adverse impact on regional housing prices. As to affordable housing, particularly below market rate housing, we observe that this is city-wide if not a state and national issue. On a regional basis, the project should not affect the price or the affordability of housing units. As to inclusionary zoning, the 1981 Questor Study prepared at the request of the City concludes that:

"existing inclusionary programs in cities throughout California and the United States have not been effective in providing the number of units needed for low and moderate income households. A mandatory inclusionary program for the City of Sacramento would not be an effective technique for ensuring an adequate supply of affordable housing."

C. TRAFFIC AND CIRCULATION

See material in the separate binder section labelled "Traffic and Circulation."

D. PUBLIC SERVICE AND PHYSICAL ASPECTS

1. Annual Taxes and Fees (p. G-9).

The Draft EIR concludes that the annual net gain to the City from property taxes from the projects would be \$215,000. This figure apparently assumes that both projects "build out" in the first year of construction. However, we estimate a 7-10 year building period. Given current and projected inflation, buildings constructed in the second through tenth year would have a considerably higher market value and hence assessed value and would thus produce higher revenues to the City than indicated in the Draft EIR.

E. ECONOMIC GROWTH AND BUSINESS PARK DEMAND

The Draft EIR suggests "reducing the potential for adverse office market impacts on the CBD and other regional office space markets by phasing Natomas Eastside/Gateway Centre construction over a ten-year rather than a seven-year buildout period (p. H-17)."

We observe that the EIR does not conclude that project approval will have a significant adverse impact on the CBD or on other suburban office developments, and thus phasing is unnecessary. Further, buildout rate is a function of the market and an artificial phasing could well conflict with market demands to the detriment of the projects and of the economic well-being of the Sacramento area.

F. SOILS AND SEISMICITY

In response to Draft EIR comments relative to seismic risk to structures, we attach a letter from Mr. William J. McCarthy, President of SMF Corporation, wherein he states that:

"soils and seismic problems at the site are basically the same on the other side of the river, i.e., downtown Sacramento. This condition, however, lends itself more to commercial development than residential. Commercial buildings tend to be designed by Structural Engineers who incorporate extensive soil engineering in their design whereas residential buildings rarely receive such engineering scrutiny regardless of soil conditions."

G. DRAINAGE AND WATER QUALITY

1. Impacts Related to Sub-surface Hydrologic Conditions
(p. J-3).

The Draft EIR notes that ground water level could hamper underground utility construction and that high ground water levels

could flood unprotected basements. As stated in Mr. William J. McCarthy's attached letter, the high ground water levels of the site will result in higher underground utility construction costs, the cost impact of which will be more significant for residential development than for commercial. As Gateway Centre buildings will not have basements, no basement flooding problems will exist.

H. AIR RESOURCES

Until the traffic and circulation information, particularly Average Daily Trip data, is clarified, analysis of the Air Resources section is difficult. We observe that Table 46 in the Air Resources section and Table 30 in the Traffic and Circulation section are in apparent conflict as to vehicle miles travelled.

I. VISUAL AND OTHER DESIGN FACTORS

The Lee Sammis Company believes that the Gateway Centre project will create a significantly more attractive "gateway" entrance into Sacramento than will residential development. Landscaping along the west side of I-5 will be done promptly, at developer expense, an unsightly sound wall will not be necessary, and the handsome buildings we propose will create an impressive entrance into Sacramento. Moreover, we strongly believe that, if possible, people's homes should not be located immediately adjacent to freeways where freeway noise and car exhaust make living less pleasant.

As a general observation, we feel that the EIR consultant "missed the boat" in this section. For example, we think it is just plain nonsense to speak of the proposed buildings creating a "visual intrusion on the freeway" (p. L-9), to suggest that

"office buildings would have potentially distracting views of I-5" (p. L-11) or that a more handsome entrance into Sacramento would result if the west side of I-5 looked like the east side of I-5 (p. L-9). We do agree, however,

that the project will appear as an extension of the existing commercial/industrial central area. We feel this is a positive aspect of the project and creates the "gateway" effect. We are also surprised that the EIR consultant does not address the desirability of locating peoples' homes next to freeways. For us, this is one of the key planning issues before the Planning Commission and the City Council.

We have asked Mr. William H. Bigelow, AIA, Vice President of Leason Pomeroy Associates, Inc., to comment in detail on the Visual and Other Design Factors section. His comments are as follows:

1. General Urban Design Policies (p. L-4).

"Developers of Gateway Centre have offered to improve the landscape open space along I-5 adjacent to the Gateway Site now if State Design of Highways would allow. Developers intention is to preimprove landscape edges up to landscape setbacks along Garden Highway and the Natomas Oaks Drive prior to building construction."

2. Impacts on Site and Vicinity (p. L-8).

We would disagree that the builtout SNCP would appear as a single homogenous residential area. The fact I-5 already bisects the SNCP and is quite wide, including landscaped open space, that it will already be perceived as two communities with I-5 being a barrier and separator. Gateway Centre will, in fact, provide a visual as well as a natural sound buffer for the west side residential and will not require the unsightly sound wall now proposed.

It should also be noted through this discussion that moderate and affordable housing of higher densities have been typically pushed up against the freeways, which is a less desirable location for housing because of noise, pollutants, etc. It basically represents bad planning as far as LPA is concerned and the concept of an office buffer stepping down to the western residential seems much more sensitive. The future office buildings separated by parking areas, which could easily be bermed from the freeway would be a nicer "Gateway" to the City than a continuous sound wall, high density (and probably lower quality) residential, and unimproved open space."

"Per this item it should be noted that all buildings abutting Natomas Oaks Boulevard are maximum two stories in height; that the Gateway Centre landscape and building setbacks along Natomas Oaks is a minimum 40 feet; and that Natomas Oaks is a 90 foot right-of-way. The residential to the west will have a landscape setback providing a total distance of over 130 foot from any Gateway structure to any residential structure to the west. In addition berming within our 40 foot landscape setback, we could easily screen all parking areas from Natomas Oaks Boulevard."

3. Effects on Surrounding Travel Routes (p. L-9).

"Again, is the sound wall what the City wants as the "Gateway" to the City? The American River would still be perceived as a natural separator of the urban/suburban areas. Discovery Park will not be affected and, in fact, with the generous open space buildings, Gateway Centre would appear as an extension and lead into the Park and City beyond. They will interrupt sporadically the tree line, though. This part of the EIR seems the most appropriate area to bring up the sound wall solution. With other possibilities available for buffering the residential (i.e., Gateway Centre), why subject people living in the proposed residential to the noise and pollutants of the freeway. The idea that the office projects would 'weaken' the 'Gateway' effect is arbitrary and terribly subjective to interpretation."

4. Garden Highway.

"We will save the existing trees that are healthy, similar to what Sammis did at Point

West and they will be incorporated into the landscape concepts."

5. Elevated Interchanges (p. L-10).

"Top of two-story buildings will be at +30 feet. It is unlikely that one could see onto the roofs of these lowest buildings from the tops of overpasses (typically not more than 25 feet in height)."

6. Gateway Centre (p. L-11).

"Views of freeways from offices is not inappropriate or considered distracting for those who work in buildings that are typically in freeway oriented projects. Parking lots will be landscaped per City Standards which require extensive tree planting that will develop 50% shade in 15 years. By this requirement, parking lots will automatically be heavily landscaped and attractive to office users viewing them. Lighting of parking areas is already required by the City to not glare or intrude into adjoining properties and streets."

7. Visual Compatibility with Surrounding Uses.

"All structures in Gateway Centre adjoining Natomas Oaks Boulevard will be maximum two stories in height behind 40' of landscaping and heights will relate to adjoining residential."

Item (2 & 3). Buildings have been zoned to gradually increase height away from the abutting residential areas. Maximum heights in the development have been located towards the center of the project and along I-5 where they will relate stronger to the high speed freeway and have the least impact on adjoining residential users."

I. ENERGY

We note that Table 53 (p. N-6) shows 750,000 square feet of commercial development at Gateway Centre site whereas only 75,000 square feet of commercial development is proposed. Correcting that error results in a total annual energy consumption of 5,704,150 therms versus 6,635,650 therms, a 38% increase in energy consumption over the SNCP rather than the 60% increase

stated in the report.

We also asked Mr. Bigelow of Leason Pomeroy Associates to comment on the Energy section of the Draft EIR. His comments are as follows:

"In general, SMUD has been uncooperative in the past in generating incentives that would encourage developers to conserve energy. They have some of the lowest power rates in the country primarily because their power generation is hydro-electric and nuclear. We tried during early design on the 5th and I redevelopment project to generate plans with SMUD that would allow, for instance, Sammis to buy power at off-peak times at a reduced rate so that chilled water could be produced and stored for use during peak load times. SMUD would not sell power at other than their single commercial rate which did not make it feasible to store chilled water. Beyond this one example, many other energy saving options used regularly in other areas are not cost effective (payback is too lengthy) in Sacramento due to lower power costs. But, we will incorporate those energy saving options that are cost effective when the project is developed and SMUD may alter their rate structures in the future to make additional options cost effective."

Page N-9. "We think it legally inappropriate to generate "solar access" standards for this project unless the City intends to implement the program throughout the City.

Item (b), we do this automatically, as appropriate.
Item (c), refers to residential.
Item (d), more residential in application.
Item (e), more residential in application.
Item (f), represents good planning and is partially mandated by City already."
Item (g), this is appropriate.
Item (h), refers to residential.
Item (i), solar space heating and water heating have not proven to date to be cost effective or appropriate on commercial projects. Solar water heating is somewhat silly, based on demand for office building.
Item (j), this is appropriate.
Item (k), this is appropriate.
Item (l), we always provide minimum site lighting that will still provide security (about 1/2 foot candle average throughout).

It should be noted that while total energy demand will be greater for the proposed developments, water and sewer demands are considerably less.



SACRAMENTO, CALIFORNIA 95814

Received: Oct. 1, 1981

October 1, 1981

Mr. Cliff Carstens, Senior Planner
City Planning Department
927 10th Street
Sacramento, California 95814

RE: South Natomas
Environmental Impact Report

Dear Cliff:

As a commercial real estate broker involved in the Sacramento office market, I became concerned with some statements made in a recent newspaper article and took the time to review a copy of the new South Natomas Environmental Impact Report. After reading the report, I would like to briefly comment on some of the impacts and mitigation measures being recommended.

Under the land use category, there are several references to the possible negative impact upon the continued revitalization of the CBD as a major regional commercial center, the negative impact upon development of office space in the CBD, and the possibility of a lack of full utilization of existing office structures in the CBD. The report mentions on Page H-16, "development of a 3.35 million square foot office park in proximity to the CBD could draw tenants with marginal downtown needs who are attracted by the improved visibility, parking and access that a close-in suburban office park appears to offer".

During the past ten year period, the Sacramento office market has evolved from a single Central Business District market to a split market with a major concentration of office space still located in the Central Business District and the development of a new major suburban office market centered primarily in the Point West, Howe Avenue, Campus Commons and American River Drive areas. The Sacramento suburban office market has absorbed approximately 4,000,000 square feet of office space since 1970. Many of these suburban tenants are service related companies who were originally located in the Central Business District, and who preferred suburban locations because of the low rents, abundant free parking, and accessibility to residential areas.

During that same period, the Central Business District continued to expand and absorb all vacant space to the point where we now have a very low vacancy rate in the Central Business District, somewhere in the area of 2%.

In our opinion, the vast majority of office tenants remaining in the Central Business District are office users who would not in the past, and will not in the future, desire a suburban office location whether it be in the "Northeast Area," the "South Area," or any proposed suburban office parks in the South Natomas area.

The Central Business District tenants can be categorized as either government and government related or private sector tenants. The government related tenants would include legislative advocates, lobbyists, consultants, and law firms specializing in governmental activities. The private sector tenants would include major law firms, major accounting firms, engineering companies, financial and some service related companies. These tenants in both categories will always desire locations in the Central Business District because of their day to day business activities dealing with either Federal, State, County, or City government agencies. There is also a substantial amount of new office development slated for the CBD as pointed out in the EIR, which will more than satisfy the proposed expansion and demand for new office space by these CBD tenants.

Another major point that needs clarification in my opinion, deals with historical absorption figures for the Sacramento metropolitan area. The report correctly points out that Sacramento has absorbed approximately 600,000 square feet of office space annually for the past ten years. What it fails to mention, is that the vast majority of this absorption has occurred in the suburban market with very little absorption taking place in the Central Business District, because of the lack of any major new development over the last eight years. The new development now taking place downtown, specifically, the Capitol Bank of Commerce headquarters building at 3rd and Capitol Mall, the Sanvins Company development at 5th and "J" Streets, and the new Carma Hotel Office Development on the old Weinstock's parking lot at 12th and "L" Streets, will allow a tremendous amount of expansion of the CBD tenants, many of whom desire additional space in the downtown area. These new developments could have a significant impact on the annual absorption figure, increasing it possibly by as much as 25% to 30% annually.

One argument currently being used by opponents of office development in South Natomas is that suburban office building development could take place in a variety of locations citing the McClellan area and the Power Inn Road areas. In our opinion, these do not offer viable alternatives for high-quality suburban office building development in the Sacramento metropolitan area. Major users contemplating relocations to the western United States are looking for high-quality, campus-like environments in a totally master planned office park surrounded by other high-quality office buildings.

First Campus Commons and then later the Point West area offered excellent examples of planned unit developments which have helped Sacramento tremendously in attracting new office users. As the demand for suburban office locations in Sacramento by outside users increases, the availability of high-quality suburban sites is declining rapidly. For all practical purposes, the Campus Commons and Point West areas are completely built-out and offer little available space for major users. The Carma development at Highway 50 compares to the Point West and Campus Commons PUD's, but it is limited in total size to less than 50 acres and is currently under development.

This raises the question as to where new high-quality suburban planned unit developments can take place. In our opinion, the South Natomas area offers an excellent location and will be highly desirable to future tenants considering Sacramento.

A specific example of this was the California Farm Bureau Federation. Formerly located in Berkeley for the past 50 years, the California Farm Bureau Federation decided in 1976 to relocate their offices to the Sacramento area. Upon an extensive site selection survey, the Farm Bureau decided upon South Natomas as an area they would consider for their new location. Because the South Natomas area was not zoned for office development at that time, the City of Sacramento offered the Farm Bureau as an alternative the redevelopment site located at 11th and "J" Streets, which was available for development. The Farm Bureau Executive Committee clearly stated that they had no intention of locating in an urban Central Business District-type environment and that they clearly wanted a suburban site. At that point, the Farm Bureau considered and came very close to locating in the Fresno area, and was only able to stay in Sacramento when they purchased as an alternative, Parcel C in the Point West area.

If Sacramento is able to attract major high-quality office users similar to the Farm Bureau, it will have to offer high-quality, suburban office locations such as the South Natomas area. High-quality office users will not relocate to Sacramento if their options are the Power Inn Road area or the north McClellan areas.

In conclusion, a similar type of action was required by the Sacramento Planning Commission approximately six years ago to allow the development of the Powell-Teichert Office Complex on American River Drive near Watt Avenue. At that time, the site which is now the Powell-Teichert Center and the Farm Credit Bank Building, was zoned for multi-residential use. The local Homeowners Association became quite concerned with the prospect of office development when Powell-Teichert originally announced their intentions. After lengthy public

PAGE FOUR
October 1, 1981

hearings, the County voted in favor of the office development. The culmination of the Powell-Teichert Office Center, Farm Credit Bank Building, as well as the other office buildings developed at Watt Avenue and American River Drive, clearly demonstrate the compatibility of office and residential use. In many homeowners opinions, the office development that resulted actually enhanced the surrounding residential area more than would have been possible with a multi-residential use. As opposed to apartment buildings which would have generated traffic 24 hours a day, seven days a week, the office buildings are virtually empty during the evening hours and on weekends. Their heavily landscaped, campus like settings and award winning architecture act as a very attractive buffer between the residential areas on American River Drive and the Watt Avenue arterial.

Should you have any questions regarding any of the above comments or if I can provide you with further information, please don't hesitate to give me a call.

Kindest regards,

Very truly yours,

COLDWELL BANKER

Thomas C. Aguer

TCA:ch

cc: Mr. Greg Rodgers, Project Manager

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October 1, 1981

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02004/004

Planning Commission
City of Sacramento
927 - 10th Street, Suite 300
Sacramento, CA 95814

Attention: Cliff Carstens

Re: Draft EIR for South Natomas Business Parks

Dear Mr. Carstens:

On behalf of 885 Investment Company (Enlow Ose et al) we submit to you the following comments on the draft EIR.

We do not question the overall adequacy of the draft EIR, although there appear to be some internal inconsistencies and need for clarification of various data. Essentially, the report is consistent with the data presented with the application for Natomas Eastside that the proposed uses are strongly supported in terms of the economic growth needs of the City and business park demand, and that the proposed development of the area will require mitigation of traffic impacts, as will further development under the existing community plan.

We concur with the finding stated in the summary of findings that:

"The project would add to recent trends towards diversification of the regional economic base. The nature of project office provisions would attract new employment sectors to the region - including corporate headquarters, high-technology tenants and large information-processing firms - which would broaden the regional economic base and help off-set declines in public sector employment," while at the same time generally reducing overall public service needs.

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We note further that with respect to the displacement of potential housing, the report states at page E-21 that, "Given the apparent availability of sufficient buildable land apart from South Natomas within the metropolitan area, the addition of up to 1,800 units from the project site would not have a significant adverse impact on the regional supply of housing." It is clear that the critical housing problem is not the lack of available land for housing but rather the lack of availability of affordable housing with respect to the economic and employment base in the Sacramento area. The report notes that unemployment rates in the Sacramento Metropolitan Statistical Area have consistently run higher than nationally, running 10.5% in 1980 and approximately 15% in the South Natomas, Northgate-Garden Land area. Indeed, community plan designations of land for residential development will not contribute to the availability of affordable housing in the absence of an employment and economic base which will support the marketing of such housing.

The principal adverse impact stated in the draft EIR is the increase in volumes of traffic and, absent any mitigation, significantly decreased levels of service at major intersections. It should be noted, however, that the "project" addressed by the EIR consists of the combined projects - two substantially different projects with substantially different impacts, both in kind and degree. Each project must be individually assessed with respect to its impacts and the ability to mitigate those impacts.

Our principal concern with the draft is its failure to address each project on its own merits and to break down the cumulative data. The Natomas Eastside project is an integrated, mixed-use project, constituting an expansion of the existing business, professional, and commercial usage contemplated by the existing community plan.

We would call to your attention the need for clarification or additional information with respect to the following specific factors.

1. The preparers of the draft EIR should provide the basic raw data and assumptions upon which traffic projections are based in order that a meaningful analysis may be made of the projections contained in the report.

2. The conclusions stated with respect to the impact of the proposed office development on the City generally and its relationship to the CBD as stated on pages C-3, D-14 and D-16 are inconsistent with the actual data reported on pages H-11 to 15. Consistent with data provided by the applicant with the application for the Natomas Eastside project, the economic growth and business park demand section of the draft EIR indicates that absorption of regional office space on an overall basis has kept a reasonable pace with development to date, and that the level of office space development planned is consistent with the office space demand figures reported.

3. The conclusions stated on page C-2 with respect to housing is inconsistent with, and unsupported by, the data contained in the population, housing, and employment section of the report. The conclusion fails to take into account that portion of new jobs which would be required to support the need for housing specified in the existing community plan.

4. Table 27 on page F-10 contains an error in its projection of an increase in ADT for the commercial portion of the Natomas Eastside project, in that no expansion of commercial usage is proposed over that currently designated in the community plan.

5. Table 28 should be broken down for each proposed project i.e., Gateway Center and Natomas Eastside, for each of the intersections.

6. The Alternatives section of the report fails to consider the alternative of approving only one of the two projects without further changes in the existing community plan. This is a significant alternative inasmuch as it is clear that the Natomas Eastside project is a self-contained project, within an area designated in part by the existing community plan for business and professional and commercial development, displacing substantially less dwelling units than the other project proposed, and having substantially less traffic impacts, particularly on the Garden Highway, the I-5/Garden Highway off-ramps, and the residential collector Natomas Oaks Drive.

We believe that the draft EIR overall has addressed the significant issues associated with the proposed projects and that preparation of a final EIR incorporating responses

to significant comments received on the draft will result in a complete and adequate environmental assessment of the proposed projects.

Respectfully submitted,
BOS INVESTMENT COMPANY

By William G. Holliman, Jr.

WGH:js

CITY PLANNING COMMISSION
OCT - 1 1981
RECEIVED

September 30, 1981

Sacramento Area
Council of Governments
State 300, 800 "H" Street
Sacramento, California 95814
(916) 431-5920
Mailing Address:
P.O. Box 808
Sacramento, California 95804

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City of Marysville
City of Woodland

Mr. Cliff Carstens, Senior Planner
City of Sacramento Planning Department
927 10th Street, Suite 300
Sacramento, CA 95814

Re: Draft EIR for South Natomas Business
Park Proposals

Dear Mr. Carstens:

I appreciate the opportunity to comment on the subject draft EIR. These comments are from SACOG staff. We have two main comments.

The discussion on page K-7 concerning the Regional Analysis for Air Resources significantly misstates the relationship of this project to the new draft Sacramento Air Quality Plan developed by this agency. In fact, the air quality simulation modeling that forms the technical base for that plan uses the approved community plans (with growth projections to 1987) as the descriptions of the land use pattern for the area. The South Natomas Community Plan does then represent development consistent with that analysis. The problem is that the results of the analysis do not show the attainment of federal air quality standards for ozone. We estimate that an additional 17% or 18% reduction in hydrocarbon emissions will be necessary to project attainment. I conclude then that the estimated 2.1 to 3.3% increase in highway vehicle emissions is totally inconsistent with the intent of the draft Air Quality Plan.

I recommend, therefore, that the Air Resources Mitigation Section be greatly expanded to include actions like employer-sponsored ridesharing programs as well as bike and pedestrian support programs to reduce the associated mobile source emissions.

Our second comment concerns an aspect of stationary source emissions not covered in the draft EIR--toxic materials. While the project description indicates that the project will house corporate office space (page B-4) with computer programming, data processing, and clerical processing (page E-14); supporting letters from Mr. Alan Ewen of SACTO indicate

19

Mr. Cliff Carstens
September 30, 1981
Page 2

the possibility of "sophisticated high-technology manufacturing." It is our understanding that high technology manufacturing uses toxic materials, generates toxic wastes, and constitutes potential employee as well as community health hazards. The Sacramento Air Pollution Control District has recently received a grant from the Environmental Protection Agency to study these toxic materials in the Sacramento area.

I recommend that the final EIR identify the potential impacts associated with this type of manufacturing. I can refer you to a report, titled "Estimates of Occupational Safety and Health Impacts Resulting from Large Scale Production of Major Photovoltaic Technologies", BNL 51324, August 1980.

The report was prepared by the Biomedical & Environmental Assessment Division, National Center for Analysis of Energy Systems, Brookhaven National Laboratory, Upton, New York 11973. The report, in assessing safety impacts of photovoltaic technologies, explored the impacts of high technology-electronics firms.

I hope these comments will be useful to you.

Sincerely,

Gary L. Stonehouse

GARY L. STONEHOUSE
Director of
Environmental Planning

GLS:pal

Sacramento City Planning Commission.

Members in Session:

It was over four years ago, when the South Natomas Community Plan was under study, members of the Gardenland and Northgate community met with planning staff and members of the Planning Commission on numerous occasions. Some of you seated here will remember the hours we spent together working on the fine points of the Plan. Fred, Larry, George -- you were there. Chris Hunter, you were there, too, working with ECOS.

During those trying hours, the subject of housing density came up. Planning staff had suggested an average of 7 units per acre. Debate continued for several sessions. Fred Silva, on a memorable night, spoke eloquently and long for what seemed like hours, about how South Natomas would become an integral part of the central city, with desirable housing close to the Central Business District and government work-places. ECOS, with Myra Erwin and Chris Hunter spearheading their effort, spoke about a transit-oriented community that would make it easy for people to get to and from work without using their private vehicles. Housing density was raised to 11 units per acre.

Some of us in the community fought hard against high density. We lost the fight. We accepted our loss, I feel, with good grace. We have not taken a wait-and-see, complacent attitude. We have worked diligently to make our community a better place to live -- a better place to move into -- regardless of the pressures brought on by heavy density.

Now we come together again. The ink was barely dry on the Plan before we were asked to make changes. All of you know the constraints put on our small island by street and freeway design, by the two rivers on our borders, and the drainage canals. You know how the few freeway access and egress points will make it almost impossible to serve residential traffic, to say nothing of offices and industrial traffic from outside the community.

Now the question arises: On whom will we rely to make sure our community will remain desirable, healthy and orderly, our streets and interchanges uncluttered, if the proponents have their way?

Members of the Planning Commission -- citizens of Sacramento -- I ask you: Have you traveled Howe Avenue and Fair Oaks lately? Have you become entangled with the stinking morass along Arden and Howe? Have you spent any time in the traffic in the vicinity of Cal Expo or Campus Commons? These people who wish to place their so-called business parks and light industrial complexes in South Natomas are the same people who made that mess!

Are the people of South Natomas expected to be pleased with such a vision for our future?

A

The proponents claim that this is the only place where they can entice out-of-town corporations to build their western edifices. I say this is nonsense. There are places within the South Natomas area, in North Sacramento and Del Paso Heights, near McClellan, and at least a dozen other places on the south and east sides of Sacramento better suited for office parks and light industry, closer to the homes of the unemployed workers they claim they will be helping with jobs.

It is unimaginative to say the only place where suitable space is available is along a freeway with difficult access and zoned for residential uses. Truly creative designers should be able to find other and better sites for this kind of development.

I insist that the only reason the proponents wish to change the zoning is because they own the property in that place, and not in other places where they or someone else might develop.

I say further that if the opposite conditions were present -- that the housing industry was booming and not depressed as now -- these same developers would be crying to have industrial zoning changed to residential.

Before tonight's session began, a copy of the South Natomas Community Association NEWS was placed at each of your chairs. In this issue, page one, is an editorial, signed by me, that offers a viewpoint of the subject EIR and the projects proposed. This is a public viewpoint, put forth within our community newspaper for public reaction.

At this time, I would like to request that the editorial be placed on the record of this Planning Commission meeting, and the words I have just read put into the record as well.

Thank you for myself, and for the thousands of families who will be making South Natomas their home within the next decade.

Robert V. Doyle
South Natomas Community Association
October 1, 1981

APPENDIX B. PUBLIC HEARING COMMENTS

A public hearing to consider the adequacy of the DEIR was opened at the regular meeting of the Sacramento Planning Commission on Thursday evening, October 1, 1981. A summary of comments received in the public hearing follows:

October 1, 1981

| <u>Name and Address</u> | <u>Comments</u> |
|---|---|
| Chris Hunter City Planning Commission | Traffic impacts at I-880 and W. El Camino Avenue interchange should be addressed for the "I-880 Frontage" and "Northwest Quadrant" alternatives. |
| Robert Doyle South Natomas Community Association | Will the quality of life of the South Natomas community be diminished if the projects are built? Are there other sites in the north area (e.g. McClellan) that are available for business park developments? |
| George Muraki City Planning Commission | Is there a means of mitigating the increased housing costs that will occur due to inflated land values as a result of the two projects? |
| Jerry Rioux South Natomas resident | How do you accommodate the additional households required as a result of the projects when you are displacing 1800± residential units? Is the same secondary job multiplier used for both the traffic and the employment assessments? Since neighborhood office and commercial users will probably not locate within the office parks, and since a portion of the Natomas Eastside project site was designated for neighborhood office and commercial uses, won't the projects displace neighborhood office and commercial uses and, in turn, additional residential uses? |
| Mary Elizabeth Alden South Natomas resident | Shouldn't the EIR address alternative sites throughout the city, rather than concentrating on the Natomas area? Isn't there available zoned land within the city on which offices could locate? |

Don Horel
President
South Natomas Community
Association

Will there be too much office space to be absorbed in the next 5 years, given the information cited on DEIR page H-13(4)(a)?

Given the projected increase in households and the displacement of 1800+ residential units as a result of the projects, where will these people live (re: DEIR p. G-10(3))?

If the projects aren't built at the proposed sites, won't similar projects be built elsewhere in the city (re: DEIR p. G-10(3))?

Will the projects improve or not diminish the existing quality of life of South Natomas?

Won't these projects be growth-inducing and encourage other similar projects to develop in South Natomas?

Will office land uses undermine the planned transit orientation of South Natomas?

Shouldn't the EIR discuss alternative sites throughout the area (e.g. the southeast quadrant of I-880 and Northgate Blvd., East Yolo, downtown, the McDonnell-Douglas site) including sites already zoned for the proposed land uses and smaller, dispersed sites?

Shouldn't developers be required to finance capital improvements required as a result of their projects rather than the fair-share equitable scheme proposed in the EIR?

Appendix C

TRAFFIC ANALYSIS SUPPLEMENT



CITY PLANNING COMMISSION

OCT 14 1981

RECEIVED

October 14, 1981

M14717.B0

Mr. Clif Carstens
Senior Planner
City Planning Department
927 10th Street, Suite 300
Sacramento, California 95819

Dear Clif:

Subject: South Natomas Business Park Traffic Analysis


On October 2, 1981, the Sacramento City Planning Department authorized CH2M HILL to conduct two traffic analyses to assist the City in their evaluation of the South Natomas Business Park Draft EIR. We were to determine the peak-hour traffic volumes and related levels of service at critical study area intersections for the following scenarios:

1. The revised Community Plan with the proposed Natomas Eastside project land uses substituted in, and;
2. The revised Community Plan with the proposed Gateway Center project land uses substituted in.

Enclosed are the results of the two analyses. The results are given in a format similar to the traffic analysis figures and tables in the SNBP Draft EIR. Figures 1 through 4 show A.M. and P.M. traffic volumes. Table 1 summarizes the levels of service and percent of roadway capacity used at each critical intersection. The same base case assumptions used in the SNBP Draft EIR were used in this analysis (e.g., build-out, land use types, roadway and intersection improvements, trip generation rates, and trip assignment and distribution).

If you have any questions, please contact Al Spiers.

Sincerely,



Bradford Blandin, Manager
Planning Department

v1
Enclosure

Table 1
PEAK HOUR LEVEL OF SERVICE -
COMMUNITY PLAN, NATOMAS EASTSIDE,
AND GATEWAY CENTER PROJECTS

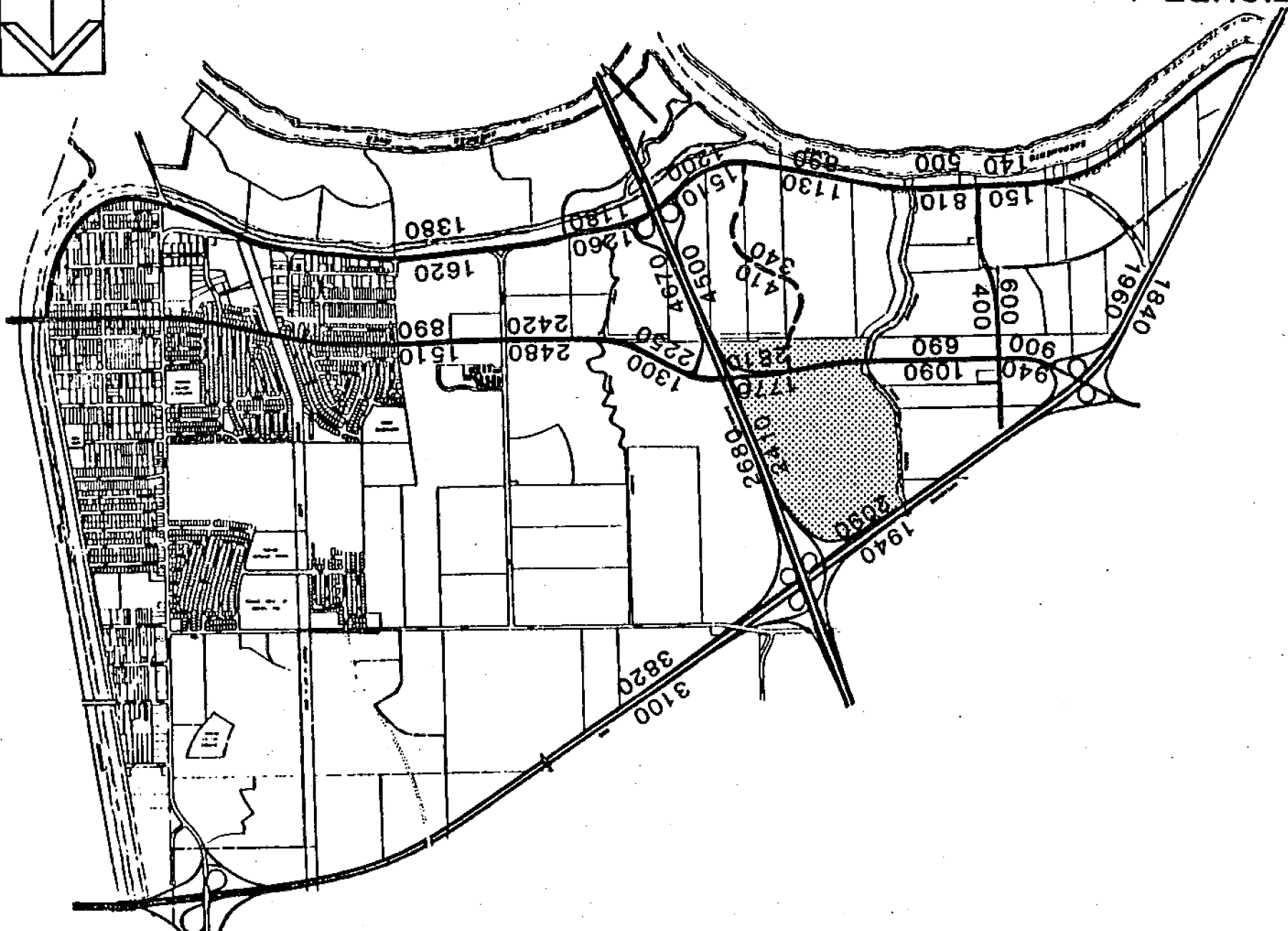
| Critical Intersections ^b | Levels of Service and Percent of Capacity Used ^a | | | | | |
|---|---|---------|------------------|---------|----------------|---------|
| | South Natomas Community Plan | | Natomas Eastside | | Gateway Center | |
| | AM Peak | PM Peak | AM Peak | PM Peak | AM Peak | PM Peak |
| Natomas Oaks Drive/ West El Camino | B/62 | C/77 | F/114 | F/141 | D/85 | E/90 |
| I-5 Northbound Off Ramp/West El Camino | A/43 | B/59 | E/90 | B/62 | C/67 | B/62 |
| Natomas Oaks Drive/ Garden Highway | A/43 | A/51 | A/46 | A/55 | A/45 | E/94 |
| Orchard/West El Camino | A/46 | A/52 | B/56 | B/63 | A/48 | B/56 |
| I-5 NB Off Ramp/ Garden Highway | A/48 | B/56 | B/59 | B/62 | A/54 | C/67 |
| I-5 SB Off Ramp/ Garden Highway | C/72 | D/80 | E/99 | E/93 | E/99 | F/108 |

Source: CH2M HILL, October 14, 1981.

^aLevel of service (LOS) shown in letter designation followed by percent of roadway capacity used (e.g., B/62). For definition of LOS, see Table 25 in SNBP Draft EIR.

^bAssumed minimum set of intersection improvements defined in South Natomas Business Park Draft EIR.

**SNCP PM PEAK DIRECTIONAL TRAFFIC FLOWS
WITH NATOMAS EASTSIDE PROJECT**



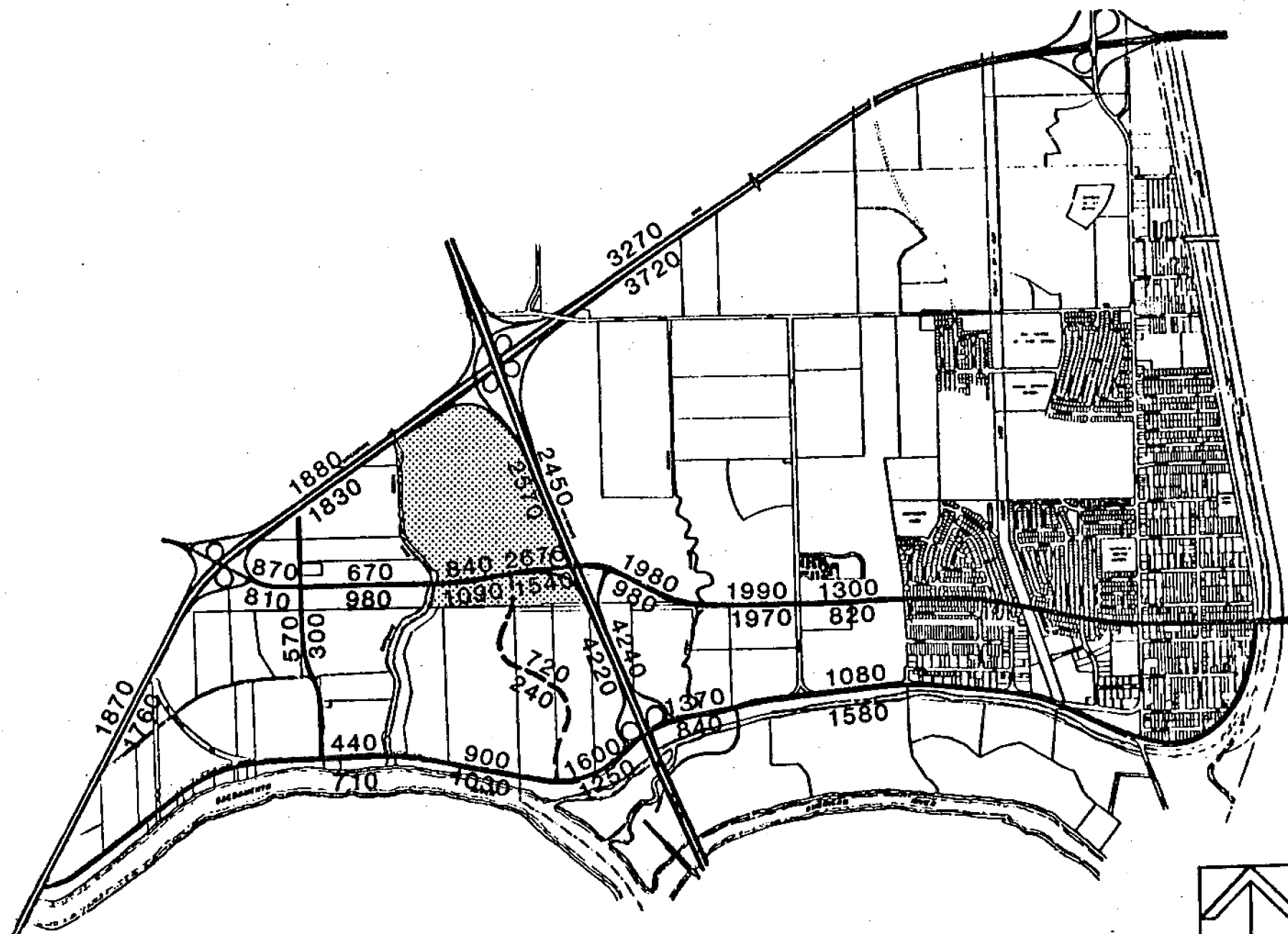
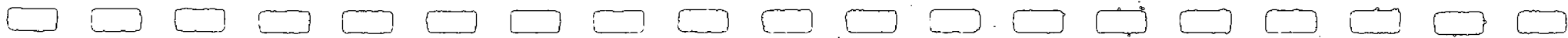


FIGURE 2
SNCP AM PEAK DIRECTIONAL TRAFFIC FLOWS
WITH NATOMAS EASTSIDE PROJECT



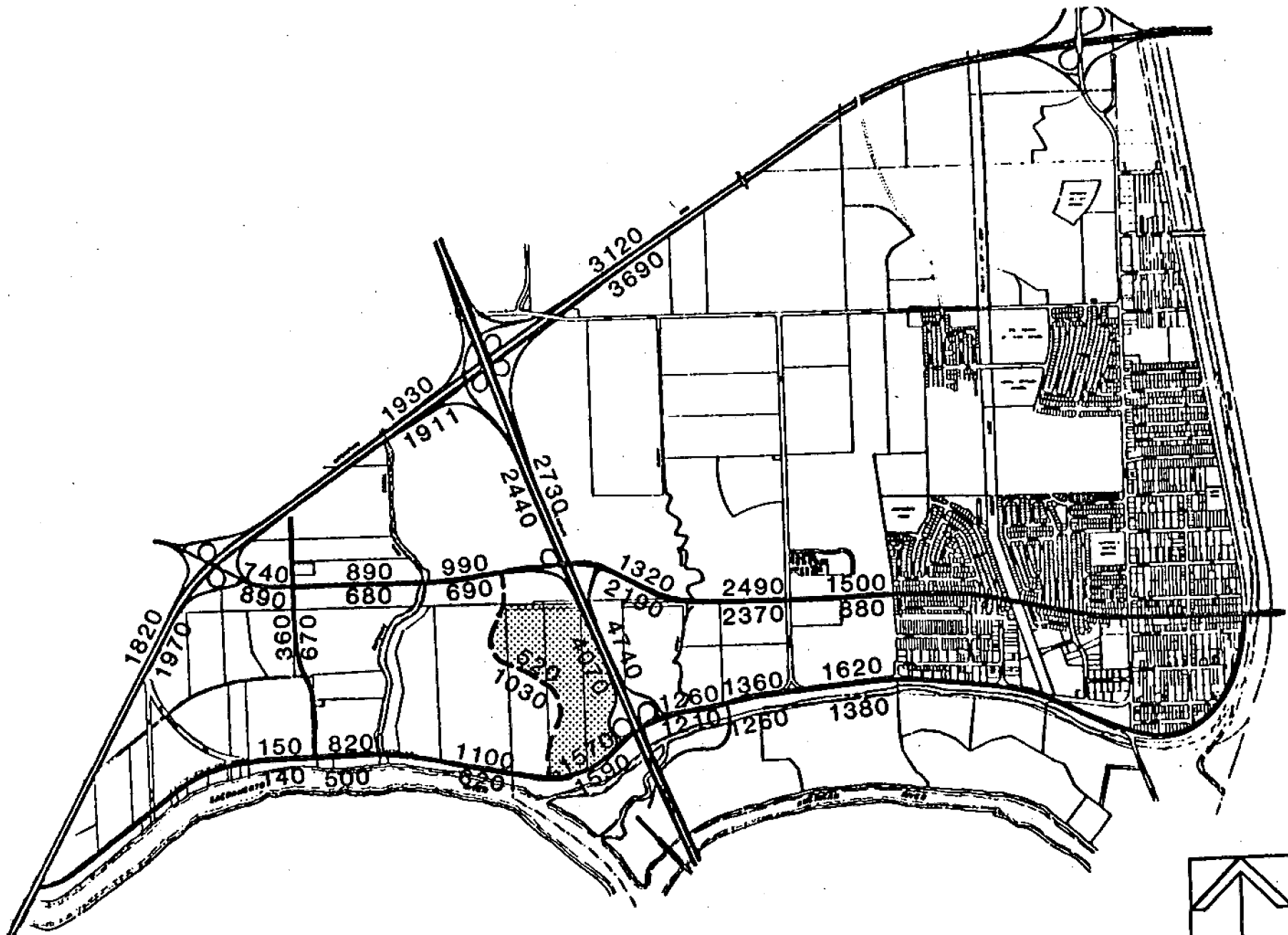
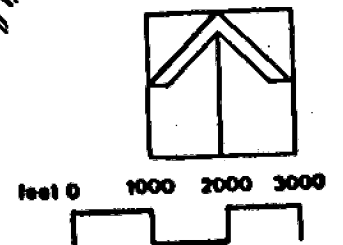


FIGURE 3
SNCP PM PEAK DIRECTIONAL TRAFFIC FLOWS
WITH GATEWAY CENTER PROJECT





PLANNING DEVELOPMENT PERMIT

SACRAMENTO CITY
PLANNING DEPARTMENT
725 J STREET
SACRAMENTO, CA. 95814
TELEPHONE (916) 449-5604

P-9114

Application date 7-11-80
8-6-80

Project Location SW quadrant of I-5 & I-880
Assessor Parcel No. 225-230-15, 24 Comm. Pln. South Natomas
Owner 885 Investment Co. Phone No. 920-2855
Address 425 University Ave., Ste. 208, Sacto., CA 95825
Applicant Wm. G. Holliman Phone No. 444-3900
Address 555 Capitol Mall, Ste. 950, Sacto., CA 95814
Signature [Signature] CPC Mtg. Date _____

REQUESTED ENTITLEMENTS

☒ Environ. Determination: EIR Required
☒ General Plan Amend from residential to commercial
(30+ ac.) & office (93+ ac.) & to delete school site

☒ South Natomas
Community Plan Amend: from residential-22 average
(11+ ac.) to commercial (5+ ac.) & office (6+ ac.);
from commercial/shopping center (16+ ac.) to office;
from residential-22 average (16+ ac.) to commercial;
~~XXXXXX~~ from residential-7 average (70+ ac.) to
office; from residential-7 average (21+ ac.) to resi-
dential-22 average; relocate 0.5+ ac. Fire station
~~XXXXXXXXXXXX~~ from N side of West El Camino Ave.
to S side of West El Camino Ave; to delete 10+ ac.
school site; to allow additional intersection onto
West El Camino (for a total of two)
☐ Special Permit

☐ Variance

☐ Plan Review

☒ PUD Designation & Schematic Plan approval for a
160+ ac. business & residential park

☒ Other Initiate Rezone of 160+ vacant ac. from A to:
office (OB-PUD) or more restrictive zoning (106+ ac.);
general commercial (C-2-PUD) or more restrictive
zoning (30+ ac.); light density multiple family (R-3-PUD)
or more restrictive zoning (21+ ac.)

Permit Sent to Applicant: _____ Date _____ By: _____ Sec. to Planning Commission

Key to Actions

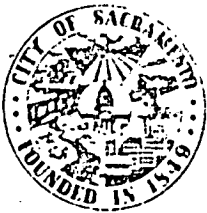
R - Ratified D - Denied
Cd - Continued RD - Recommend Denial
A - Approved RA - Recommend Approval
AC - Approved w/Conditions RAC - Recommend Approval w/Conditions
AA - Approved w/Amended Conditions RAA - Recommend Approval w/Amended Conditions

IAF - Intent to Approve based on Findings of Fact
AFF - Approved based on Findings of Fact
RPC - Return to Planning Commission
CSR - Condition indicated on attached Staff Report

NOTE: There is a ten (10) calendar day appeal period from commission action date and a thirty (30) calendar day appeal period from council action date. Action authorized by this document shall not be conducted in such a manner as to constitute a public nuisance. Violation of any condition(s) will constitute grounds for revocation of this permit. Building permits are required in the event of any building construction. The County Assessor is notified of actions taken on rezoning, special permits and variances.

Gold - applicant Receipt White - applicant permit Green - expiration book Yellow - department file Pink - permit book

P-9114



PLANNING DEVELOPMENT PERMIT

SACRAMENTO CITY
PLANNING DEPARTMENT
725 J. STREET
SACRAMENTO, CA. 95814
TELEPHONE (916) 449-5604

P-9114

Application date 7-11-80
8-6-80

Project Location SW quadrant of I-5 & I-880
Assessor Parcel No. 225-230-15,24 Comm. Pln. South Natomas
Owner 885 Investment Co. Phone No. 920-2855
Address 425 University Ave., Ste. 208, Sacto., CA 95825
Applicant Wm. G. Holliman Phone No. 444-3900
Address 555 Capitol Mall, Ste. 950, Sacto., CA 95814
Signature [Signature] CPC Mtg. Date _____

REQUESTED ENTITLEMENTS

| REQUESTED ENTITLEMENTS | Commission Action/Date | Council Action/Date | Filing Fees |
|--|------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> Environ. Determination: <u>EIR Required</u> <u>Reg. Dec.</u> , Exempt _____ | _____ | _____ | \$ <u>90</u> |
| <input checked="" type="checkbox"/> General Plan Amend from residential to commercial (30+ ac.) & office (93+ ac.) & to delete school site | _____ | Res. _____ | \$ <u>345</u> |
| <input checked="" type="checkbox"/> South Natomas Community Plan Amend: from residential-22 average (11+ ac.) to commercial (5+ ac.) & office (6+ ac.); from commercial/shopping center (16+ ac.) to office; from residential-22 average (16+ ac.) to commercial; XXXXXX from residential-7 average (70+ ac.) to office; from residential-7 average (21+ ac.) to residential-22 average; relocate 0.5+ ac. Fire station XXXXXXXXXXXX from N side of West El Camino Ave. to S side of West El Camino Ave; to delete 10+ ac. school site; to allow additional intersection onto West El Camino (for a total of two) | _____ | Res. _____ | \$ <u>0</u> |
| <input type="checkbox"/> Special Permit | _____ | Ord. _____ | \$ _____ |
| <input type="checkbox"/> Variance | _____ | Res. _____ | \$ _____ |
| <input type="checkbox"/> Plan Review | _____ | _____ | \$ _____ |
| <input checked="" type="checkbox"/> PUD Designation & Schematic Plan approval for a 160+ ac. business & residential park | _____ | Res. _____ | \$ <u>1,560</u> credited from P-9140 Receipt 5306 |
| <input checked="" type="checkbox"/> Other Initiate Rezone of 160+ vacant ac. from A to: office (OB-PUD) or more restrictive zoning (106+ ac.); general commercial (C-2-PUD) or more restrictive zoning (30+ ac.); light density multiple family (R-3-PUD) or more restrictive zoning (21+ ac.) | _____ | _____ | \$ <u>(550)</u> |
| Permit Sent to Applicant: _____ Date _____ By: _____ Sec. to Planning Commission | _____ | NOTIFICATION AND POSTING | \$ <u>36</u> |
| | | FEE TOTAL | \$ <u>2,031</u> |
| | | Receipt No. | <u>5395</u> |
| | | By/date | <u>SRD/9-16-80</u> |

Key to Actions

| | | |
|------------------------------------|---|--|
| R - Ratified | D - Denied | IAF - Intent to Approve based on Findings of Fact |
| Cd - Continued | RD - Recommend Denial | AFF - Approved based on Findings of Fact |
| A - Approved | RA - Recommend Approval | RPC - Return to Planning Commission |
| AC - Approved w/Conditions | RAC - Recommend Approval w/Conditions | CSR - Condition indicated on attached Staff Report |
| AA - Approved w/Amended Conditions | RAA - Recommend Approval w/Amended Conditions | |

NOTE: There is a ten (10) calendar day appeal period from commission action date and a thirty (30) calendar day appeal period from council action date. Action authorized by this document shall not be conducted in such a manner as to constitute a public nuisance. Violation of any condition(s) will constitute grounds for revocation of this permit. Building permits are required in the event of any building construction. The County Assessor is notified of actions taken on rezoning, special permits and variances.

Gold - applicant Receipt White - applicant permit Green - expiration book Yellow - department file Pink - permit book

P-9114



PLANNING DEVELOPMENT PERMIT

SACRAMENTO CITY
PLANNING DEPARTMENT
725 J STREET
SACRAMENTO, CA. 95814
TELEPHONE (916) 449-5604

P -9145

Application date 9-5-80

Project Location Portion of NW quadrant of I-5 & Garden Highway
Assessor Parcel No. 274-041-04 & por. of 06 Comm. Pln. South Natomas
Owner Morrison Homes P.G. & E. Co. Phone No. _____
Address 4441 Auburn Blvd., Ste. P, 95814 77 Beale St., San Francisco, 94106
Applicant Gateway Centre Associates Phone No. _____
Address 1451 River Park Dr., Ste. 110, Sacto. 95814
Signature Catherine P. DeLaCruz CPC Mtg. Date _____

REQUESTED ENTITLEMENTS

Commission
Action/Date

Council
Action/Date

Filing
Fees

☒ Environ. Determination: EIR Required, Exempt _____ \$ 90
☒ General Plan Amend from residential to commercial _____ Res. _____ \$ 345

& offices

☒ 1978 South Natomas Community Plan Amend: from residential (12 av.) to business & professional offices (83+ ac.); from residential (12 av.) to commercial-shopping center (10+ ac.)

☐ Rezone _____ Ord. _____ \$ _____

☐ Tentative Map _____ Res. _____ \$ _____

☐ Special Permit _____ \$ _____

☐ Variance _____ \$ _____

☐ Plan Review _____ \$ _____

Amend Natomas Oaks ☐ PUD from: multiple family residential (23 av.) to business park (30+ ac.); townhouse-condominium (8.5 av.) to business park (25+ ac.); townhouse-condominium (11 av.) to business park (36+ ac.); rename 93+ net ac. to Gateway Centre PUD

☐ Other Initiate rezone of 93+ net ac. as follows: _____ \$ 550

R-1A(PUD) to OB(PUD) or more restrictive zoning (51+ ac.); R-1A(PUD) to C-1(PUD) or more restrictive zoning (10+ ac.); R-3(PUD) to OB(PUD) or more restrictive zoning (30+ ac.); A to OB(PUD) or more restrictive zoning (2+ ac.)

Permit Sent to Applicant: _____ Date _____ Sec. to Planning Commission _____

Key to Actions: R - Ratified D - Denied IAF - Intent to Approve based on Findings of Fact
Cd - Continued RD - Recommend Denial AFF - Approved based on Findings of Fact
A - Approved RA - Recommend Approval RPC - Return to Planning Commission
AC - Approved w/Conditions RAC - Recommend Approval w/Conditions CSR - Condition indicated on attached Staff Report
AA - Approved w/Amended Conditions RAA - Recommend Approval w/Amended Conditions

NOTE: There is a ten(10) calendar day appeal period from commission action date and a thirty (30) calendar day appeal period from council action date. Action authorized by this document shall not be conducted in such a manner as to constitute a public nuisance. Violation of any condition(s) will constitute grounds for revocation of this permit. Building permits are required in the event of any building construction. The County Assessor is notified of actions taken on rezoning, special permits and variances.
Gold- applicant Receipt White- applicant permit Green- expiration back Yellow- department file Pink- permit book

NOTIFICATION AND POSTING \$ 36

FEE TOTAL \$ 1,251

Receipt No. 5413

By/date: 26 SEP 80

P -9145



PLANNING DEVELOPMENT PERMIT

SACRAMENTO CITY
PLANNING DEPARTMENT
725 J STREET
SACRAMENTO, CA. 95814
TELEPHONE (916) 449-5604

P -9145

Application date 9-5-80

Project Location Portion of NW quadrant of I-5 & Garden Highway
Assessor Parcel No. 274-041-04 & por. of 06 Comm. Pln. South Natomas
Owner Morrison Homes P.G. & E. Co. Phone No. _____
Address 4441 Auburn Blvd., Ste. P, 95814 77 Beale St., San Francisco, 94106
Applicant Gateway Centre Associates Phone No. _____
Address 1451 River Park Dr., Ste. 110, Sacto. 95814
Signature Catherine P. DeLaCruz CPC Mtg. Date _____

REQUESTED ENTITLEMENTS

Commission
Action/Date

Council
Action/Date

Filing
Fees

- ☒ Environ. Determination: EIR Required
☒ General Plan Amend from residential to commercial
& offices

_____ \$ 90
_____ Res. _____ \$ 345

- ☒ 1978 South Natomas
Community Plan Amend: from residential (12 av.) to
business & professional offices (83+ ac.); from residen-
tial (12 av.) to commercial-shopping center (10+ ac.)
☐ Rezone

_____ Res. _____ \$ _____
_____ Ord. _____ \$ _____

☐ Tentative Map

_____ Res. _____ \$ _____

☐ Special Permit

_____ \$ _____

☐ Variance

_____ \$ _____

☐ Plan Review

_____ \$ _____

Amend Natomas Oaks

- ☒ PUD from: multiple family residential (23 av.) to
business park (30+ ac.); townhouse-condominium (8.5 av.)
to business park (25+ ac.); townhouse-condominium (11 av.)
to business park (36+ ac.); rename 93+ net ac. to Gateway Centre PUD
☒ Other Initiate rezone of 93+ net ac. as follows:
R-1A(PUD) to OB(PUD) or more restrictive zoning (51+ ac.);
R-1A(PUD) to C-1(PUD) or more restrictive zoning (10+ ac.);
R-3(PUD) to OB(PUD) or more restrictive zoning (30+ ac.);
to OB(PUD) or more restrictive zoning (2+ ac.)

Res. _____ \$ 230

_____ \$ 550

NOTIFICATION
AND POSTING \$ 36

FEE TOTAL \$ 1,251

Receipt No. 5413

By/date DP 26 SEP 80

Key to Actions

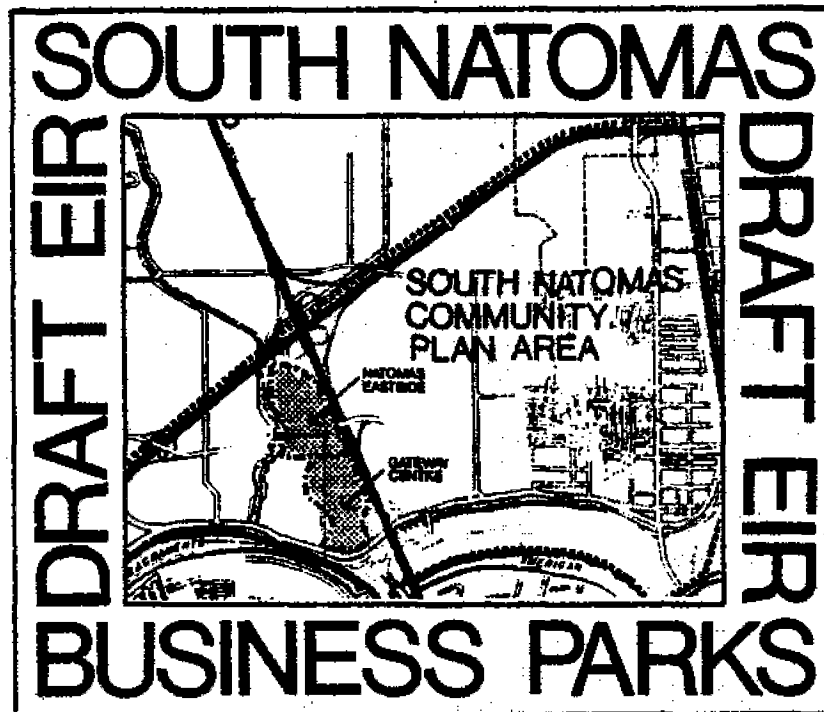
R - Ratified
Cd - Continued
A - Approved
AC - Approved w/Conditions
AA - Approved w/Amended Conditions
D - Denied
RD - Recommend Denial
RA - Recommend Approval
RAC - Recommend Approval w/Conditions
RAA - Recommend Approval w/Amended Conditions

IAF - Intent to Approve based on Findings of Fact
AFF - Approved based on Findings of Fact
RPC - Return to Planning Commission
CSR - Condition indicated on attached Staff Report

NOTE: There is a ten(10) calendar day appeal period from commission action date and a thirty (30) calendar day appeal period from council action date. Action authorized by this document shall not be conducted in such a manner as to constitute a public nuisance. Violation of any condition(s) will constitute grounds for revocation of this permit. Building permits are required in the event of any building construction. The County Assessor is notified of actions taken on rezoning, special permits and variances.

Gold - applicant Receipt White - applicant permit Green - expiration book Yellow - department file Pink - permit book

P -9145



SACRAMENTO, CALIFORNIA

Wagstaff and Brady

DRAFT ENVIRONMENTAL IMPACT REPORT
**SOUTH NATOMAS
BUSINESS PARKS
PROPOSALS**
SACRAMENTO, CALIFORNIA

Prepared for the
CITY OF SACRAMENTO

by
WAGSTAFF AND BRADY
Urban and Environmental Planners

with the Assistance of

CH2M HILL, Environmental and Traffic Engineering
LE BLANC & COMPANY, Urban Economics

August 1981



CITY OF SACRAMENTO

CITY PLANNING DEPARTMENT

725 "J" STREET

SACRAMENTO, CALIF. 95814
TELEPHONE (916) 449-5604

MARTY VAN DUYN
PLANNING DIRECTOR

August 14, 1981

Interested Persons:

SUBJECT: Draft EIR for South Natomas Business Park Proposals

The City Planning Department is forwarding this document for review and comment to all agencies, organizations, or interested persons indicated on the enclosed distribution list. Reviewers should focus on the sufficiency of the EIR in discussing possible impacts upon the environment, ways in which adverse aspects might be mitigated, and alternatives to the project.

This document has a 30-day review period; consequently, comments should be received by the Planning Department no later than October 1, 1981. The Sacramento City Planning Commission will consider this document at their special meeting on October 1, 1981, at 5:15 p.m. in the Council Chamber of City Hall, 915 I Street, Sacramento, California. Persons commenting on this document are urged to submit written comments to this office prior to the public hearing. Failure to do so will not preclude your right to testify at the hearing. Written comments and oral testimony submitted at the public hearing will be incorporated into the Final EIR. This draft EIR will also act as part of the Final EIR unless substantial changes are made. Comments on the draft and replies will be sent to those who comment; therefore, it is requested that you keep this document. The draft EIR, plus an addendum consisting of comments and responses and any additional information, will constitute the Final EIR.

A copy of this document has been forwarded for public review to the following libraries: Carmichael, Central, Del Paso, Hagginwood, King, McClatchy, McKinley, and the CSUS Science/Tech Library. In addition, a copy may be reviewed or obtained at the City Planning Department.

Please contact Diana Parker at 449-5381 or me at 449-5604 if you have any questions regarding this matter.

Cordially,

Clif Carstens
Senior Planner

CC:mlo

Enclosure

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A. INTRODUCTION*

1. SUMMARY COMPARISON OF ADOPTED PLANS AND PROPOSED PROJECT

The Sacramento City General Plan designates the subject sites for predominantly residential land uses, with a small portion for neighborhood-oriented commercial land uses (see Figure 7). The General Plan, adopted in 1974, is currently being updated by the City Planning Department.

The South Natomas community planning area consists of approximately 4,100 acres located about 3 miles north of the city of Sacramento's central business district. The area's boundaries are the Interstate 880 freeway on the west and north, the Western Pacific Railroad tracks on the east, and the American and Sacramento rivers on the south. In March 1978, the City Council adopted the South Natomas Community Plan (SNCP) with the following goals:

- Maximize the long-term retention of open space land north of the Interstate 880 freeway for active agricultural production by establishing suitable planning parameters for urbanization in South Natomas
- Accommodate as many people as possible consistent with quality development and adequate open space
- Provide commercial and office districts of a size and location to adequately serve the existing and anticipated future population of the community, consistent with adequate circulation and transportation facilities
- Provide a balanced circulation system that serves local residents and through-traffic with a minimum of congestion or conflict with residential neighborhoods, shopping areas, and other land uses
- Make South Natomas a public transit oriented community
- Support a high level of environmental quality within the community

A complete list of SNCP goals and objectives is included herein as Appendix A. A description of the relationship of the proposed projects with SNCP goals and objectives is provided in this report under LAND USE.

Consistent with the city's General Plan, the SNCP designates the subject sites primarily for residential land uses, with smaller portions for neighborhood-oriented commercial uses, business/professional offices, a school site, a fire station, and open space corridors along the Natomas Main Drainage Canal and the Interstate 5 freeway.

* Note: This italicized introductory section, including the "Summary Comparison of Adopted Plans and Proposed Project" and "EIR Requirement," has been prepared by the Sacramento City Planning Department staff (August 1981).

In January 1979, the City Council adopted a schematic plan for an area of South Natomas which overlaps one of the two subject sites. This schematic plan, known as the Natomas Oaks PUD, provides for 2,300 residential units in a variety of housing types consistent with the SNCP (see Figure 10). The resolution approving this schematic plan is included herein as Appendix B.

a. Proposed Projects

Natomas Eastside, situated on 180 gross acres, would include 106 acres of office land use (1.9 million square feet of floor space), 31 acres of commercial (232,500 square feet of floor space), 21 acres of light-density multiple-family residential (468 units), and a 1.5-acre fire station site. Building heights would range from one to six stories. The project would displace approximately 650 residential units designated on the South Natomas Community Plan.

Gateway Centre, located on 90 gross acres, includes 75 acres of office (1.45 million square feet of floor space) and 10 acres of commercial (75,000 square feet of floor space). Building heights would vary from one to six stories. The project would displace approximately 1,200 residential units as adopted with the Natomas Oaks PUD.

Each proposed project represents a major deviation from the land use designations of the city's 1974 General Plan, 1978 South Natomas Community Plan, 1980 Natomas Oaks PUD, and Zoning Ordinance. Consequently, the projects' proponents have submitted applications to:

Natomas Eastside

- Amend 1974 General Plan from residential to commercial (30± acres) and office (93± acres) and delete one school site.
- Amend the South Natomas Community Plan, changing designations as follows:
 - from residential of 22 units/acre average (11± acres) to commercial (5± acres) and office (6± acres);
 - from commercial/shopping center (16± acres) to office;
 - from residential of 22 units/acre average (16± acres) to commercial;
 - from residential of 7 units/acre average (70± acres) to office;
 - from residential of 7 units/acre average (21± acres) to residential of 22 units/acre average;
 - relocate 0.5± acre fire station from the north side of West El Camino to the south side of West El Camino Avenue;
 - delete a 10± acre school site; and
 - allow an additional intersection onto West El Camino (for a total of two).

- Request PUD designation and Schematic Plan approval for a 160± acre business and residential park.
- Request to initiate rezoning of 180± vacant acres from Agriculture (A) to:
 - office (OB-PUD) or more restrictive zoning (106± acres);
 - general commercial (C-2-PUD) or more restrictive zoning (30± acres);
 - light density multiple family (R-3-PUD) or more restrictive zoning (21± acres).

Gateway Centre

- Amend the 1974 General Plan from residential to commercial and offices for 90± vacant acres.
- Amend the 1978 South Natomas Community Plan from residential (9.7 units/acre average) to:
 - business and professional offices (75± acres); and
 - commercial-shopping center (10± acres).
- Amend the Natomas Oaks PUD from:
 - multiple-family residential (23 units/acre average) to business park (30± acres);
 - townhouse-condominium (8.5 units/acre average) to business park (25± acres);
 - townhouse-condominium (11 units/acre average) to business park (36± acres); and
 - establish 90± acres as the Gateway Centre PUD.
- Request to initiate rezoning of 90± net acres from:
 - townhouse (R-1A PUD) to office building (OB-PUD) or more restrictive zoning (51± acres);
 - townhouse (R-1A PUD) to limited commercial (C-1 PUD) or more restrictive zoning (10± acres);
 - light-density multiple-family (R-3 PUD) to office building (OB-PUD) or more restrictive zoning (30± acres); and
 - agriculture (A) to office building (OB-PUD) or more restrictive zoning (2± acres).

2. EIR REQUIREMENT

The Sacramento City Planning Department has received two separate applications to develop office/commercial business parks in the South Natomas Community Plan area. The proposed projects are known individually as "Natomas Eastside" and "Gateway Centre" and are considered to be a "project" as defined by the California Environmental Quality Act--State EIR Guidelines, Section 15037. The guidelines require preparation of an Initial Study to evaluate a project's effect on the environment (Section 15080).

After reviewing the Initial Studies prepared for each project (Appendices E and F herein), the city's Environmental Coordinator determined that each project could have significant environmental impacts on their respective sites and surrounding area.

The proposed projects may have individually and cumulatively significant effects by increasing vehicular traffic beyond the capacity of the existing and planned roadway system; increasing vehicular emissions and decreasing ambient air quality on a micro as well as a regional level; increasing noise and exposing future residents to unacceptable noise levels; altering the planned land use pattern; affecting the existing housing stock and creating a demand for additional housing; altering the location, distribution, density, and growth rate of the human population; and altering existing or new public service requirements such as fire protection, schools, sanitary systems, and maintenance of public facilities.

Other potential impacts include: residential displacement and potential secondary effects, competition with the central business district which the city has been trying to revitalize, and growth-inducing pressure to alter land uses surrounding the subject site, such as changing adjacent residential designated land uses to commercial/office building, and changing urban/agricultural reserve designated land north of Interstate 880 to residential/office building land use.

Based on the findings of potentially significant effects identified in the Initial Studies and due to public concern for the potential environmental effects of the projects, the Environmental Coordinator required the preparation of an environmental impact report (EIR) pursuant to Section 15080-(a), 15082-(b) and (c), and 15084(a).

Since the projects are adjacent to one another and have similar potential environmental impacts, the Environmental Coordinator required the preparation of a single EIR as provided in Section 15068. A single EIR has been required to provide a comprehensive assessment of the potentially significant individual and cumulative impacts of each proposed project.

As provided for in State EIR Guidelines, the focus of the draft EIR is limited to specific issues and concerns identified as possibly significant in the Initial Studies of the proposed projects.

The draft EIR describes the likely environmental consequences if the proposed projects are approved. The draft EIR has been prepared pursuant to the California Environmental Quality Act of 1970 (Public Resources Code 21000, Division 13), and

to related state and city EIR guidelines. The draft EIR is an informational document to aid in the local planning and decision-making process. The EIR assesses the potential, individual, and cumulative effects that each project may have on the environment, lists ways to minimize potential adverse effects, and evaluates alternatives to the proposed projects.

Table I
BASIC PROJECT DATA--SOUTH NATOMAS BUSINESS PARKS

| | | | | | | |
|--------------------------------------|--|------------|-----------------------|------------|-------------------------------|------------|
| PROJECT NAMES: | SOUTH NATOMAS BUSINESS PARKS including the NATOMAS EASTSIDE PROJECT and the GATEWAY CENTRE PROJECT | | | | | |
| PROPOSED USES: | <p><u>Combined Projects:</u> 181 acres of office (3.35 million sq.ft.), 42 acres of commercial (307,500 square feet), 21 acres of residential (468 units), and a 1.5-acre fire station; 270 acres gross land area.</p> <p><u>Natomas Eastside:</u> 106 acres of office (1.9 million sq.ft.), 31 acres of commercial (233,000 sq.ft.), 21 acres of residential (468 units), and a 1.5-acre fire station; 180 acres gross land area.</p> <p><u>Gateway Centre:</u> 75 acres of office (1.45 million sq.ft.), 10 acres of commercial (75,000 sq.ft.), no residential; 90 acres gross land area.</p> | | | | | |
| DEVELOPERS/APPLICANTS: | <p><u>Natomas Eastside Project:</u> 885 Investment Company, Enlow Ose et al. (represented by William G. Holliman, Jr.; c/o McDonough, Holland and Allen, Attorneys 555 Capitol Mall, Suite 950 Sacramento, California 95814)</p> <p><u>Gateway Centre Project:</u> Lee Sammis Company (represented by John V. Diepenbrock; c/o Diepenbrock, Wulff, Plant, Hannegan 455 Capitol Mall, Suite 800 Sacramento, California 95814)</p> | | | | | |
| LOCATION OF SITES: | West of Interstate Highway 5, north of Garden Highway and south of Interstate Highway 880 (see Figures 1 and 2) | | | | | |
| PROJECT PARCELIZATION AND OWNERSHIP: | <p><u>Natomas Eastside Project:</u> A.P. 225-230-14 and A.P. 225-230-15 (885 Investment Company, owner)</p> <p><u>Gateway Centre Project:</u> A.P. 274-041-4, A.P. 274-041-5, and portions of A.P. 274-041-6, A.P. 274-041-8 and A.P. 274-041-9 (Lee Sammis Company, owner)</p> | | | | | |
| BUILDING COVERAGE | <u>Natomas Eastside</u> | | <u>Gateway Centre</u> | | <u>Totals (Both Projects)</u> | |
| | million sq.ft. | % of Total | million sq.ft. | % of Total | million sq.ft. | % of Total |
| Buildings | 1.4 | 18 | 0.6 | 15 | 2.0 | 17 |
| Streets and Parking | 4.5 | 57 | 2.0 | 51 | 6.5 | 55 |
| Open Space | 2.0 | 25 | 1.3 | 33 | 3.3 | 28 |
| Totals | 7.9 | 100.0 | 3.0 | 100.0 | 11.8 | 100.0 |
| BUILDING HEIGHTS | <p>Natomas Eastside: 1 to 6 stories</p> <p>Gateway Centre: 1 to 6 stories</p> | | | | | |
| PLAN AMENDMENTS: | <p><u>Natomas Eastside Project:</u> The City General Plan (CGP) and South Natomas Community Plan (SNCP) designate the site as residential, commercial, business and professional offices, with a school and fire station. Amendments to the CGP and SNCP would be required.</p> <p><u>Gateway Centre Project:</u> The CGP and SNCP designate the site as residential. Amendments to the two plans would be required as well as amendments to the Natomas Oaks Schematic PUD Plan.</p> | | | | | |
| ZONING CHANGES: | <p><u>Natomas Eastside Project:</u> The site is presently zoned Agriculture (A). Rezoning to Office Building (O-B PUD), General Commercial (C-2 PUD), and Light Density Multiple Family (R-3 PUD) has been requested.</p> <p><u>Gateway Centre Project:</u> The site is presently zoned Townhouse (R-1A PUD) and Light Density Multiple Family (R-3 PUD). Rezoning to Office Building (OB-PUD) and General Commercial (C-2 PUD) has been requested.</p> | | | | | |

B. PROJECT DESCRIPTIONS

I. LOCATION

a. Regional

As illustrated in Figure 1, the city of Sacramento is located about 85 miles north-east of San Francisco. Davis is to the west; Stockton to the south; and Roseville to the northeast. Interstate Highway 5 (I-5) provides primary north-south access to the city and the sites. Interstate Highway 80 (I-80) provides primary east-west access to the city, and Interstate Highway 880 (I-880) is a northerly freeway bypass around the central city, providing east-west access to the sites.

b. Local

As illustrated on Figure 2, the two contiguous projects are located in the South Natomas area on the northwest side of metropolitan Sacramento. The sites are adjacent to I-5 near its interchange with I-880, between downtown and the Sacramento Metropolitan Airport.

Natomas Eastside. The project site occupies approximately 180 acres in the northwest quadrant of the I-5/West El Camino Avenue interchange. The Natomas Main Drainage Canal forms the west edge of the site. Twenty-five acres of the site lie south of West El Camino Avenue.

Gateway Centre. The site occupies approximately 90 acres immediately adjacent to the south boundary of Natomas Eastside. Gateway Centre is bounded on the east by I-5, and on the south by the Garden Highway and the American and Sacramento rivers. Gateway Centre is separated from the Natomas Main Drainage Canal by a tract of agricultural land and Natomas Oaks Drive, a new primary collector road.

In addition to regional access provided by I-5 and I-880, the sites are served locally by east-west running West El Camino Avenue and Garden Highway which provide connections to South Natomas community areas east of I-5. The principal access point for Natomas Eastside would be West El Camino Avenue from its interchange with I-5. The principal access for Gateway Centre would be Natomas Oaks Drive between West El Camino Avenue and Garden Highway (Garden Highway also has an interchange with I-5).

2. APPLICANTS' OBJECTIVES AND PROGRAMS

a. Combined Projects

The applicants propose to develop the combined 270-acre site with 181 net acres of business park, 41 of commercial, 21 of residential (468 units), and a 1.5-acre fire station site. Basic data describing the combined proposals are provided in Table 1.

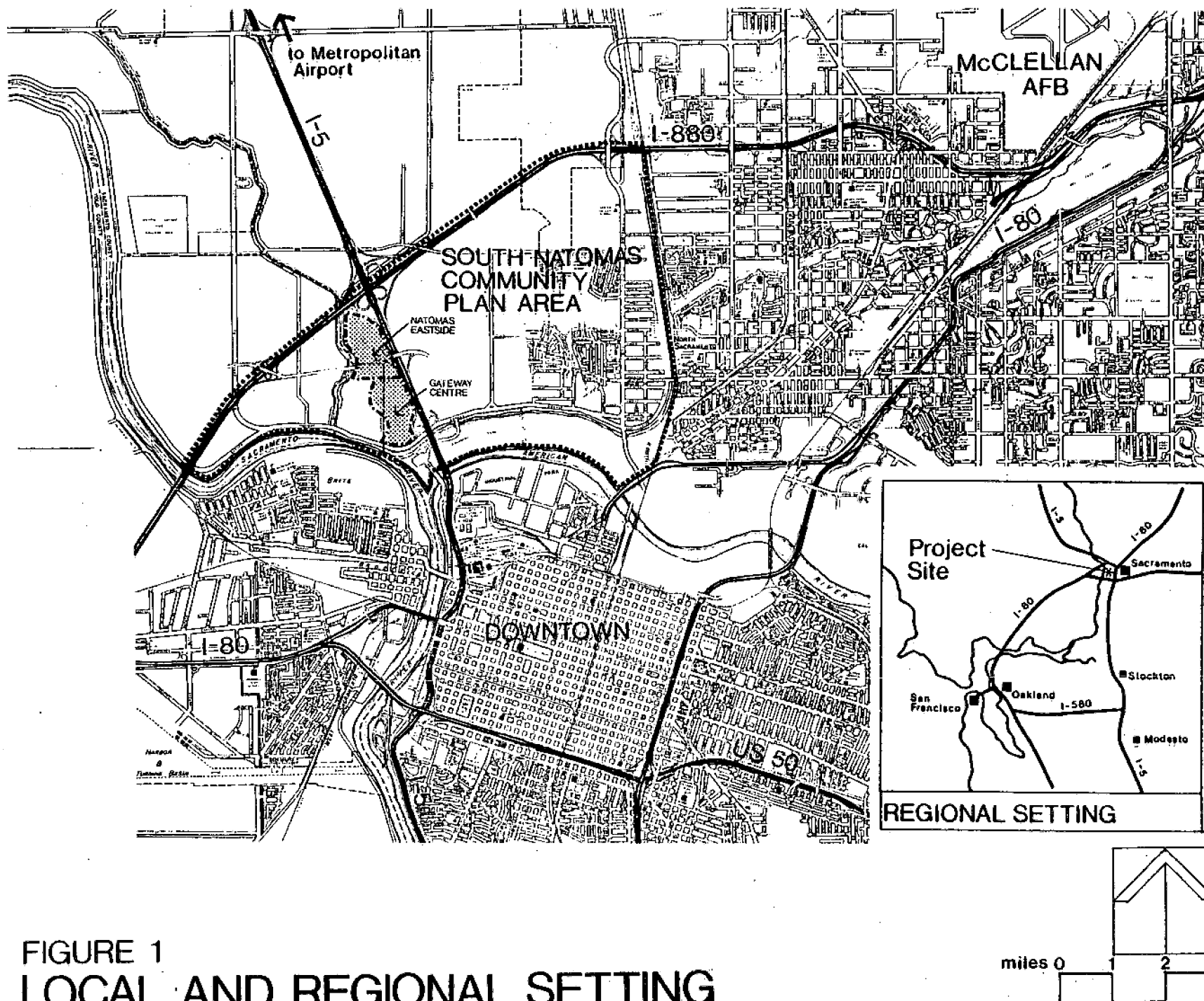
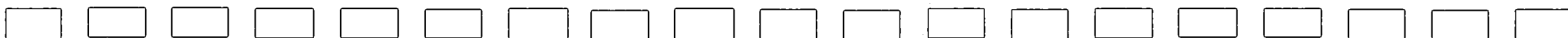


FIGURE 1
LOCAL AND REGIONAL SETTING



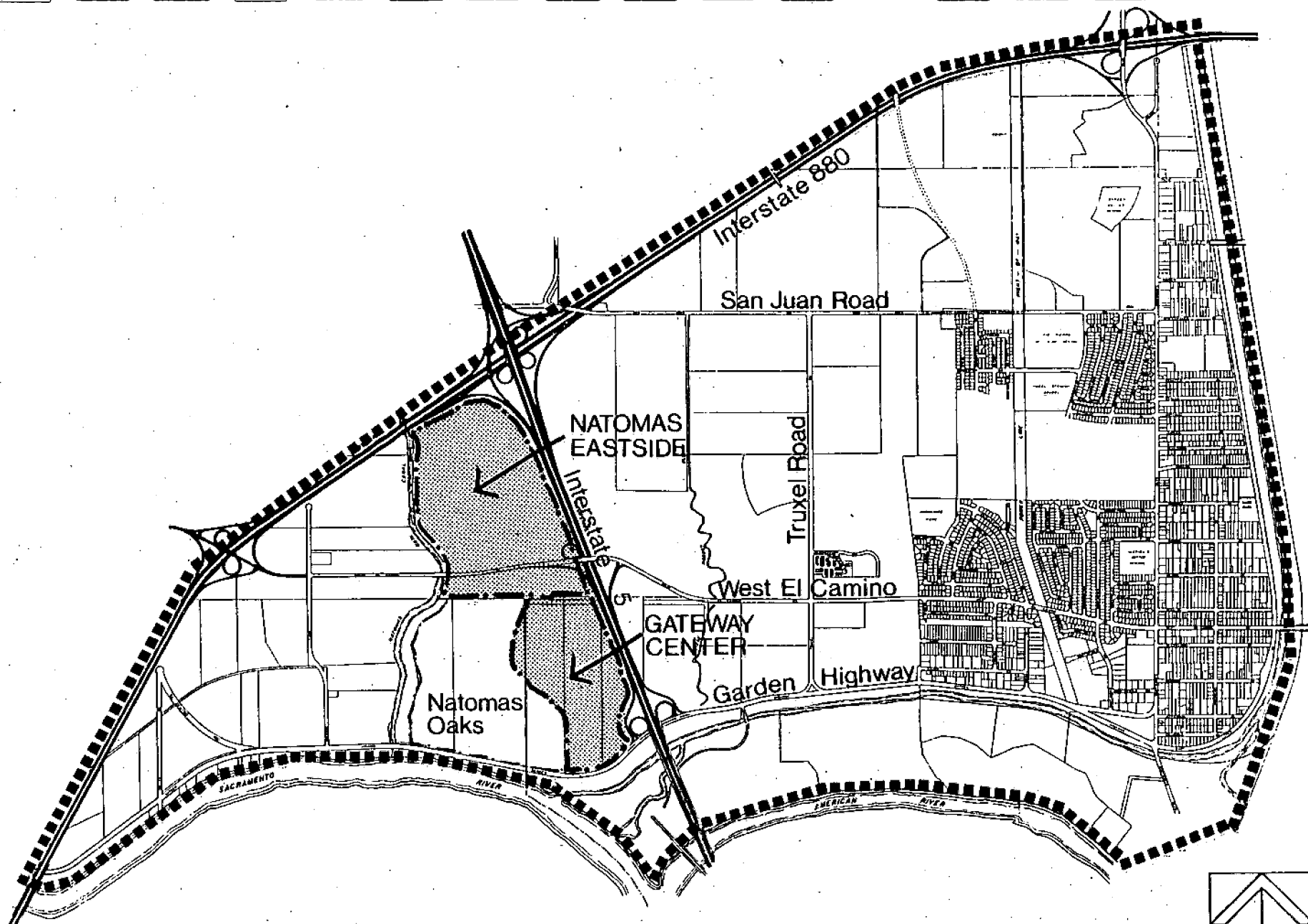


FIGURE 2
PROJECT VICINITY
SOUTH NATOMAS COMMUNITY PLAN AREA

The proposed land use changes and conceptual site plans are shown on Figures 3 and 4.

The applicants' interests in the sites are based on their perception of a high demand in the Sacramento metropolitan area for suburban, large-scale corporate office space and supportive commercial space, and their belief that the project sites represent a unique opportunity for meeting such demand.

b. Natomas Eastside

The 180-acre Natomas Eastside project, as described in Table 3, would include 106 acres of office, 31 acres of commercial, 21 acres of residential, and a 1.5-acre fire station. To illustrate the changes in land use, Table 3 compares the proposal to uses allowed under current plans and zoning.

(1) General Description of Project and Planning Objectives. The following Natomas Eastside planning objectives are paraphrased from project application materials:

- Construct an office park with a high quality design
- Capitalize on a perceived opportunity to master plan a commercial business/professional area as an integral part of a comprehensively planned community
- Create a project that could complement residential uses in the area
- Contribute to long-term retention of open space land to the north of Interstate 880
- Conform to local planning policies that restrict development west of the drainage canal until regional sanitation district and other services to South Natomas are operational and more readily available
- Create a land use mix on the project site that would require a relatively low level of community services
- Contribute to preservation of scenic corridors along the adjacent freeways

(2) Office-Commercial Area. The 106 acres of office land would provide for construction of 1.9 million square feet of floor area in buildings typically two stories in height; but, ranging up to six stories in height in the central portion of the site. The 31 acres of commercial land would provide for construction of 0.23 million square feet of floor space in one- and two-story buildings adjacent to West El Camino Avenue.

Because the project is at the conceptual planning stage, particulars on permitted uses, building types, design characteristics, and landscaping have not yet been submitted.

(3) Residential Area. The 21 acres of residential land would provide for construction of approximately 468 multifamily housing units in one-to-three-story buildings

along the Natomas Main Drainage Canal. No particulars have been submitted at this conceptual planning stage on building types, design characteristics, or landscaping.

(4) Circulation. The Natomas Eastside project would be served primarily by West El Camino Avenue, and a proposed looped extension of Natomas Oaks Drive. The looped extension would have a four-way intersection at West El Camino Avenue 1,100 feet from I-5 to the east, and a three-way intersection at West El Camino Avenue 200 feet from the bridge across the drainage canal to the west. A connector street would be constructed onsite between the two legs of the looped extension to minimize project-related vehicle movements on West El Camino Avenue.

A new bridge parallel to and similar to the existing bridge across the drainage canal on West El Camino Avenue would be necessary north of the existing bridge to carry westbound traffic from the site.²

Other offsite road construction would include widening of West El Camino Avenue from a 60-foot, two-lane right-of-way to a 120-foot, four-lane right-of-way. The exact alignment for these improvements would be determined later in the project design process. A raised curb and sidewalk would be constructed on the south side of the existing 37-foot wide Natomas Main Canal Bridge.³

(5) Drainage and Utilities. The site would be drained by a typical underground pipe drainage system which would terminate at existing trunk lines and city-maintained pumping plant at West El Camino Avenue. Stormflow would be pumped at this point into the Natomas Main Drainage Canal.⁴

Project sewer lines would be connected to existing trunk lines which extend along West El Camino Avenue and the easternmost segment of the south project boundary. These existing lines flow north along the east property line to a point where they cross under I-5 to the Natomas Treatment Plant.⁵

Project water lines would be connected to existing water mains in the area.

(6) Development Sequence. Project buildout is expected to occur over a 7-year period between 1981 and 1988. Although a precise project-phasing schedule has not been established by the applicant, it is expected that initial office space construction would begin generally at the I-5/West El Camino Avenue interchange. Residential projects would be phased in accordance with market demand.⁶

c. Gateway Centre

The 90-acre Gateway Centre project, as described on Table 4, would include 75 acres of office, 10 acres of commercial, and no residential uses. Table 4 compares the proposal to land uses allowed under current plans and zoning.

(1) General Description of Project and Planning Objectives. The following Gateway Centre planning objectives are paraphrased from project application materials:

- Construct an office park with supporting commercial services

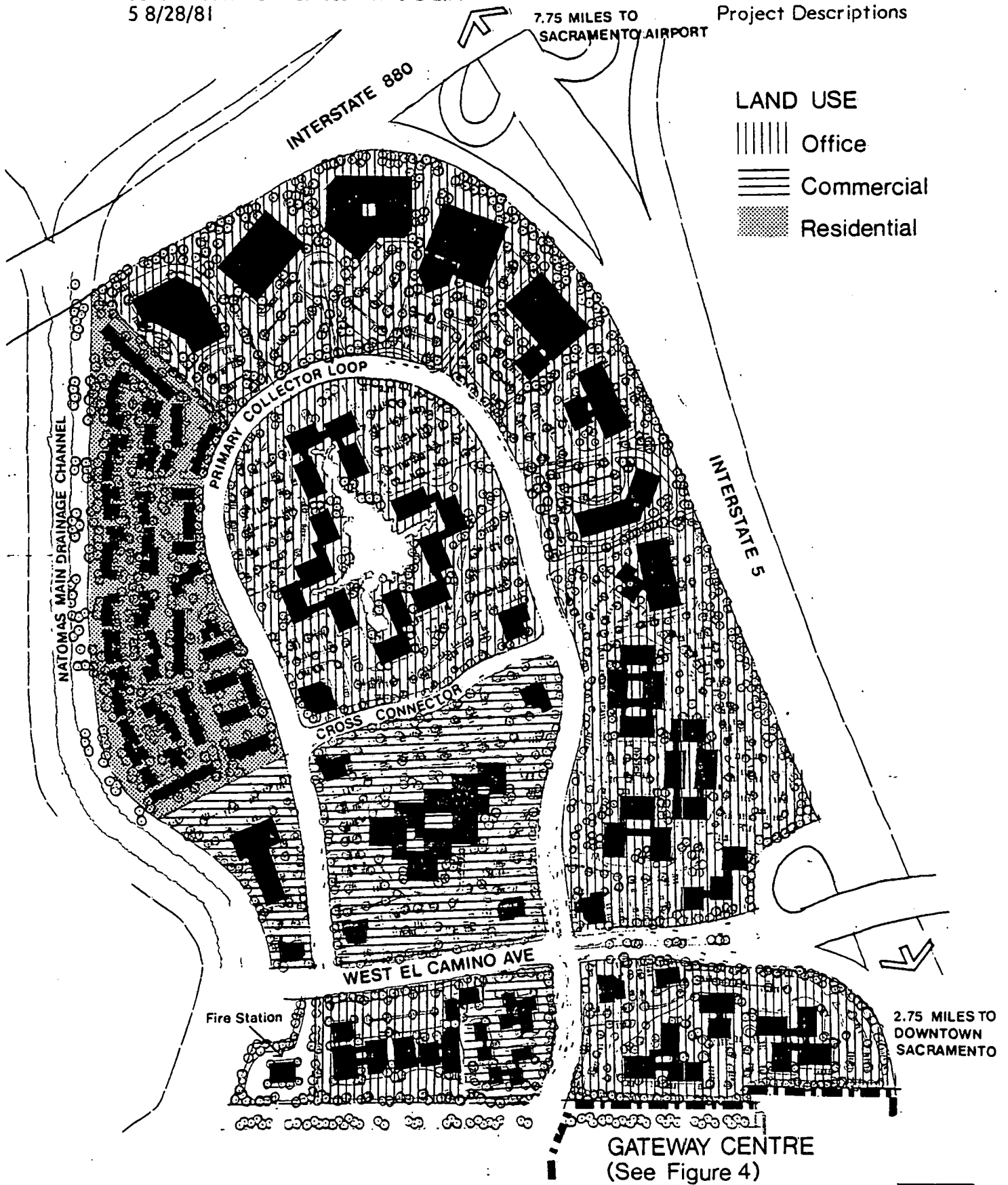


FIGURE 3
PROPOSED SITE PLAN
NATOMAS EASTSIDE

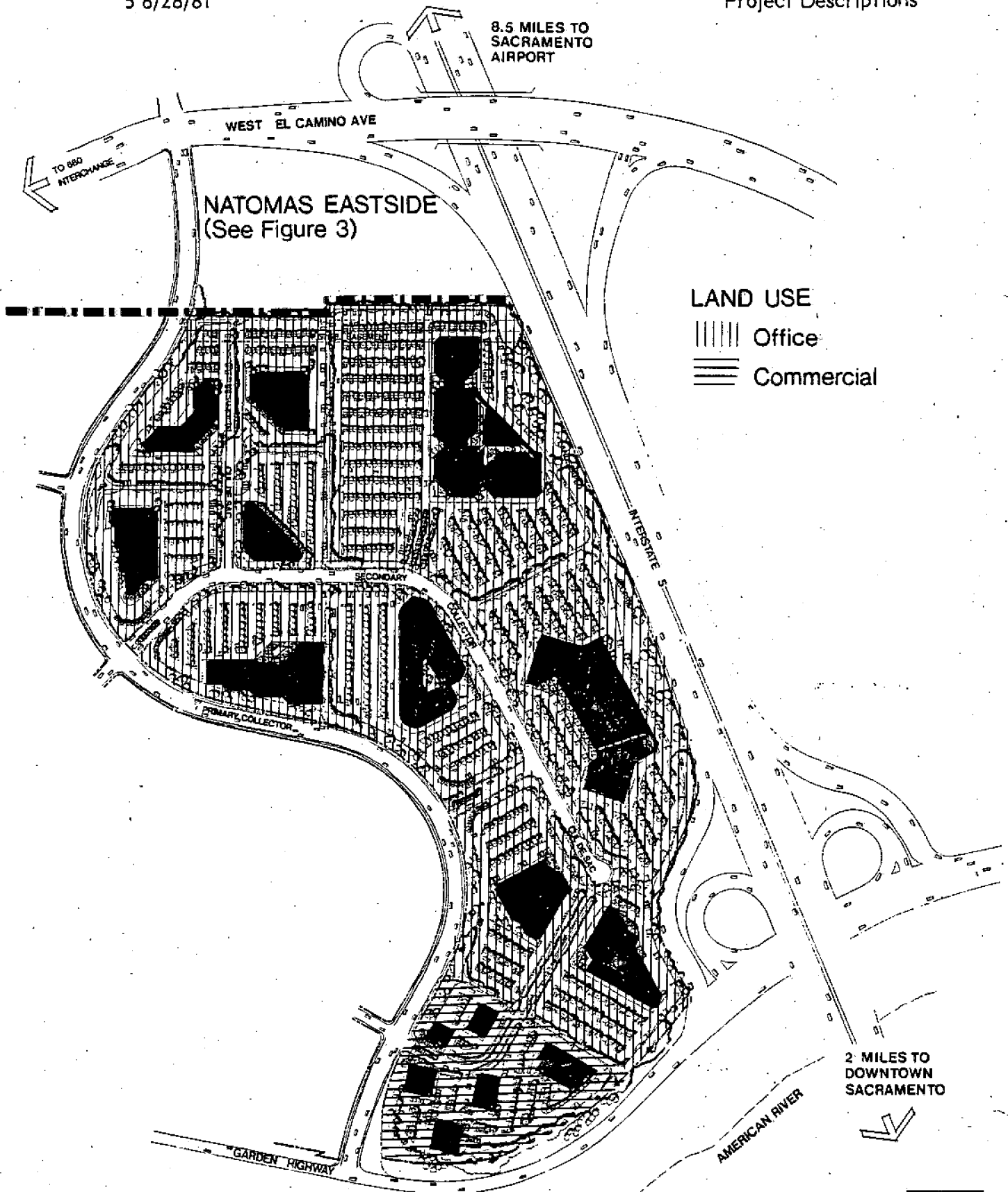


FIGURE 4
PROPOSED SITE PLAN
GATEWAY CENTRE

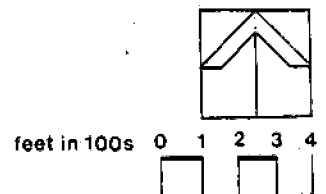


Table 3
PROJECT DATA--NATOMAS EASTSIDE VS. CURRENT POLICY

| | Existing Plan and Zoning ^a | Proposed Project |
|--|---|--|
| Total Area | 180 gross acres ^b | 180 gross acres |
| Zoning | Agriculture (A)--163 net acres | Office Building (OB-PUD)--106 net acres General Commerical (C-2 PUD)--31 net acres Light Density Multiple Family (R-3 PUD)--21 net acres |
| General Plan Designation | Residential with school site--180 acres Commercial--20 acres | Office--106 net acres Commercial--31 net acres Residential--21 net acres |
| Community Plan Designation | Residential (22 units/ac)--27 net ac. Residential (7 units/ac)--88 acres Commercial--22 net acres Business and Professional Offices--16 net acres School Site--10 net acres Fire Station--0.5 net acres | Offices--106 net acres Commercial--31 net acres Residential (22 av)--21 net acres Fire Station--1.5 net acres Delete School Site Allow Additional Intersection onto West El Camino Avenue |
| Total Residential Units ^c | 1,044 | 468 |
| Office/Commercial Building Square Footage ^c | 0.73 million | 2.13 million square feet |
| Proposed Height of Office/Commercial Structures | 50 feet | 1 to 6 stories (approx. 70 feet) |

^a1978 South Natomas Community Plan, Zoning Ordinance of the City of Sacramento (rev. July 1980).

^bAll area figures are approximations.

^cCalculated based upon combined project sq.ft./ac. ratios.

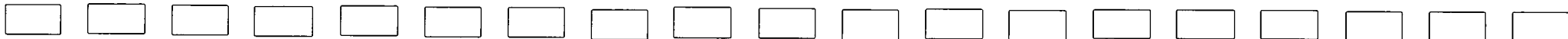


Table 4

PROJECT DATA--GATEWAY CENTRE VS. CURRENT POLICY

| | Existing Plans and Zoning ^a | Proposed Project |
|--|--|--|
| Total Area | 90 acres ^b | 90 acres 85 net acres (excludes streets) |
| Zoning | Townhouse (R-A PUD)--60 net acres Light Density Multiple Family (R-3 PUD)--14 net acres | Office Building (OB-PUD)--64 net acres Commercial (C-2 PUD)--10 net acres |
| General Plan Designation | Residential--90 gross acres | Office Building--75 net acres Commercial--10 net acres |
| Community Plan Designation | Residential (9.7 units/ac)--90 net acres | |
| Natomas Oaks Schematic Plan Designation ^c | Residential (22 units/ac)--29 net acres Residential (12 units/ac)--34 net acres Residential (7 units/ac)--25 net acres | Office Building--75 net acres Commercial--10 net acres |
| Total Residential Units ^d | 1,211 | None |
| Office/Commercial Building Square Footage | None | 1.53 million square feet |
| Proposed Height of Office/Commercial Structures | Not applicable | 1 to 6 stories (70 feet) |

^a1978 South Natomas Community Plan, Zoning Ordinance of the City of Sacramento (rev. July 1980).

^bAll area figures are approximations (within one acre).

^cNatomas Oaks PUD.

^dCalculated based upon combined project sq.ft./ac. ratios.

- Incorporate maximum flexibility in project concepts and designs in anticipation of possible changes in market demands for the proposed land uses
- Provide facilities for office and research and development companies requiring locations away from downtown areas
- Capitalize on a perceived, current market demand for corporate office space
- Create a project that would be complementary to the downtown area
- Attract major firms by providing the highest quality facilities and best location

(2) Office-Commercial Area. The 75 acres of office land would provide for construction of 1.45 million square feet of floor area in one- to six-story campus-style buildings ranging in size from 5,000 to 450,000 square feet. The 10 acres of commercial land would provide for construction of 75,000 square feet of floor space in buildings similar to the proposed office structures.⁸

Because the project is at the conceptual stage of planning, no particulars on building types, design characteristics, or landscaping have been submitted.

Marketing efforts for office space would be directed towards attracting regional offices, corporate administrative headquarters, research and development centers, and other scientifically oriented facilities. Commercial services to be attracted would include financial institutions, recreation and health facilities, and restaurants.⁹

(3) Circulation. The project would be served by Natomas Oaks Drive, a north-south primary collector street between West El Camino Avenue to the north and Garden Highway to the south. Garden Highway would be widened to four lanes between I-5 and Orchard Lane.

A secondary collector with two cul-de-sac branches would be constructed to provide general interior access. The secondary collector would have its northernmost intersection (four-way) with Natomas Oaks Drive approximately 1,900 feet south of West El Camino Avenue; and its southernmost intersection (three-way) would be 1,400 feet north of Garden Highway.

Supplementing the secondary collector would be private drives. One private drive has been conceptually planned to have direct access onto Natomas Oaks Drive at a four-way intersection located approximately 500 feet north of Garden Highway.

(4) Drainage and Utilities. Because the project is at the conceptual planning stage, the applicant has not yet developed plans for drainage and utility improvements. It is assumed that improvements for Gateway Centre will be similar to those anticipated for Natomas Eastside.

(5) Development Sequence. Because the project is at the conceptual planning stage, no development sequence has yet been established by the applicant; however, the applicant anticipates Gateway Centre build-out to occur in 7 years, starting in 1981.¹⁰

3. REFERENCES

¹William G. Holliman, Letter to M. Van Duyn, City Planning Director, re: "Preliminary Alternative Development Proposals of the 885 Investment Company," June 4, 1980.

²Spink Corporation. Evaluation of "West El Camino Avenue Road and Bridge Requirements," prepared for 885 Investment Company, 1980.

³ibid.

⁴Spink Corporation. Evaluation of "sewers," prepared for 885 Investment Company, 1980.

⁵ibid.

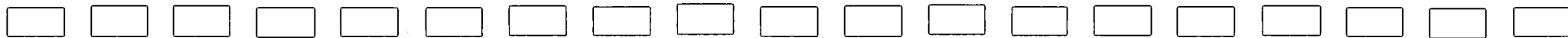
⁶William G. Holliman, "City of Sacramento Environmental Questionnaire," Number P9114, July 11, 1980.

⁷Lee C. Sammis, Letter to Sacramento City Planning Commission, re: "Request to Initiate Rezoning," August 8, 1980.

⁸Lee Sammis Company, "Attachment to Request to Initiate Rezoning," August 1980.

⁹Lee Sammis Company, "Gateway Centre Project Brochure," undated.

¹⁰Lee Sammis Company, "City of Sacramento Environmental Questionnaire," Number P-9145, September 5, 1980.



C. SUMMARY OF FINDINGS

The following section includes a summary of impact conclusions drawn from the body of this report described in terms of CEQA-required impact categories,* plus a summary of impacts and mitigations chart listing impacts and mitigation measures for the 13 community and environmental factors assessed in the report.

I. CHANGES IN GROWTH-INDUCING EFFECTS

a. Land Use

(1) Land Supply. Approval of the proposed plan amendments would result in changes in the total available land supply for various types of urban growth, with associated implications for population and economic growth. Such changes would include:

- An increase in the city's vacant commercial-office-industrial land supply of 201 acres (+ 4 percent)
- A decrease in the city's vacant residential land supply of 202 acres (- 2 percent)

(2) Pressures for Similar Development. Project approval and construction of related infrastructure improvements would increase interest in and pressures for development of additional business parks, residential development, and related support activities on other Natomas area lands.

On the other hand, the scale of project office development would reduce demands for similar, office-intensive land absorption in the Sacramento area over the next decade.

b. Employment

The projects would generate approximately 15,800 jobs directly, and 7,900 to 15,800 secondary jobs, or from 23,600 to 31,600 total jobs. The total would represent around 12 to 18 percent of the 180,000 to 200,000 new job increment anticipated in the metropolitan area (SMSA) between 1980 and 2000.

Of the total jobs generated by the projects, perhaps 15,000 to 20,000 would be "net new jobs" (filled by new labor market entries who were not previously working in similar jobs elsewhere in the area).

* State of California Office of Planning and Research, CEQA: The California Environmental Quality Act, Law and Guidelines, April 1981, Section 15143.

c. Population and Household Growth

(1) Housing. Attracting such a portion of total projected regional job growth suggests some new or unprojected growth in Sacramento population and housing stock. Based on the above "net new job" scenario, demand for 5,000 to 9,000 additional housing units could be anticipated--a 4 to 7 percent increase over the level of new units now anticipated between 1980 and 2000 in the SMSA.

(2) Population. The additional housing units would translate into an additional (non-projected) population increment of 12,600 to 22,600 people in the SMSA over the 1980-2000 period, a 1.0 to 1.7 percent increase over the current year-2000 population projection of 1.3 million.

d. Traffic and Circulation

Increases in peak hour traffic volumes would occur on all major roads in the vicinity of the project. The most noticeable effects would occur at the intersections of I-5 with Garden Highway and West El Camino Avenue. Levels of service on the freeway links would not change significantly.

e. Public Service Needs

The proposed changes in South Natomas land use would generally reduce overall public service needs. Police and fire protection needs would not change significantly. The number of elementary students would diminish, reducing by one the number of needed schools in the community. All major site infrastructure would be provided by the developers. The projects would reduce public park needs by 22 acres. The projects would have an overall positive, but minor impact on annual city revenues (less than a one percent increase) under current revenue collection procedures.

f. General Economic Growth

The project would add to recent trends towards diversification of the regional economic base. The nature of project office provisions would attract new employment sectors to the region--including corporate headquarters, high-technology tenants and large information-processing firms--which would broaden the regional economic base and help offset declines in public sector employment.

2. UNAVOIDABLE AND IRREVERSIBLE ADVERSE IMPACTS

a. Land Use. The project would eliminate approximately 201 acres of designated residential land. Added interest would be drawn to the Natomas area for further intensification of currently designated urban areas and the conversion of additional agricultural lands to urban uses.

Potentials for land use conflict would be created between the proposed office-commercial activities and future residential development to the west.

b. Population, Housing, and Employment. Attraction by the projects of a large portion of total projected regional job growth (between 12 and 18 percent of total

1980-2000 SMSA employment growth) would probably generate new or "unprojected" growth in Sacramento, as described under CHANGES IN GROWTH-INDUCING EFFECTS, pages C-1 and C-2.

c. Traffic and Circulation. Project traffic would increase volumes and significantly decrease levels of service at all major intersections in the vicinity. Many traffic impacts could be mitigated through feasible improvements to the roadway system. However, an unacceptable PM peak hour level-of-service "F" (jammed conditions) at the I-5 southbound off-ramp intersection with Garden Highway could not be mitigated without major capital expenditures.

d. Public Services. See CHANGES IN GROWTH-INDUCING EFFECTS, pages C-1 and C-2.

e. Economic Growth. Absorption of the projects 3.66 million square feet of office-commercial space over a ten-year period might result in: (a) a decline in the rate (although not the ultimate level) of development in the CBD/Capitol zones; (b) a decline in the feasibility of similar office-intensive, business park projects in the North Natomas-Airport areas, at least within the decade; and (c) slightly less diversification in other competing business park projects developing in the region (i.e., less emphasis on office components).

Absorption of project space over a 10-year period would imply an office market penetration rate of from 33 to 40 percent of projected demand, and could create a drag in the market for downtown and other office space locations (i.e., slower absorption and reduced rent potentials). A project absorption period of around 12 years would be less likely to retard demand for downtown and other office space.

The main effect on the Sacramento CBD of office space overbuilding in the Natomas area would occur if relocation of existing CBD occupants became a trend.

f. Air Resources. Onsite CO levels would increase by as much as 31 percent at specific locations (+ 0.1 to 2.9 ppm) but would remain below federal and state one-hour standards (35 to 40 ppm). Total project-generated gross emissions would increase roughly 28 percent over SNCP buildout emissions. The regional impact would amount to a 2 to 3 percent addition to the projected 1990 emissions inventory (a level consistent with the intent of the Sacramento AQMA Air Quality Plan).

g. Noise. Comparison of the projected 1990 site noise environment with the proposed project footprints indicates that buildings in Gateway Centre along I-5 would be in the state's "conditionally acceptable" category.

3. SHORT-TERM USE VS. LONG-TERM ENVIRONMENTAL PRODUCTIVITY

Both the current SNCP and the proposed project scenarios would result in the loss of production and open space values associated with 270 acres of existing agricultural lands. Approval of the projects would not change this ultimate effect.

The proposed changes in land use would result in resource impacts of a greater magnitude than those with SNCP development in the areas of air quality, water quality,

energy consumption, and visual qualities. The most notable long-term adverse changes include those described below.

a. Air Quality. See UNAVOIDABLE AND IRREVERSIBLE ADVERSE IMPACTS on page C-3.

b. Water Quality. With the proposed land use changes, total annual non-point water pollutant loadings of suspended solids would increase by about 40 percent over SNCP loadings. Although absolute discharges from the site would be insignificant relative to total upstream suspended solids loads in the Sacramento River, project increases would contribute incrementally to loadings from the metropolitan area, which, in turn, would further reduce downstream water quality.

c. Energy Consumption. Annual energy consumption for operational purposes (lighting, heating, cooling, etc.) would be approximately 60 percent greater with the projects than with SNCP development. Additionally, annual transportation-related energy consumption would be about 90 percent greater with the projects than with SNCP development. Overall project annual energy consumption would be about 80 percent greater than SNCP development.

d. Visual Qualities. The projects would change the vicinity from a homogeneous, residential-scale suburban landscape as planned in SNCP, to a mixed-scale office center/residential concentration distinctly different in character from the area east of I-5. With construction of the projects in lieu of SNCP uses, project frontage along I-5 would be perceived as an extension of the existing commercial/industrial central area across the American River. The separator effect of the river between suburban fringe areas to the north and commercial areas to the south would be lost. The river would simply divide new from existing commerce.

4. EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of Sacramento Planning Department in its Initial Study of the project determined that a number of possible environmental effects would be insignificant or could be adequately addressed by city staff in the development review process without further environmental assessment in this report. The most important of these are:

a. Beyond certain traffic safety risks to project occupants which are discussed in this report, the two projects would not have any significant effect on human health in the community.

b. Beyond the issues addressed in this report, the project would not have significant adverse effects on any other environmental, economic, or social factors.

Project changes in the level of environmental effect on the following factors discussed in this EIR were also found to be insignificant:

a. Soils and seismicity;

b. Drainage and water quality;

- d. Vegetation and wildlife; and
- e. Archaeology.

5.. SUMMARY OF IMPACTS AND MITIGATIONS

The following chart (Table.2) summarizes the impact findings and mitigation measures for the 13 community and environmental factors assessed in this report.

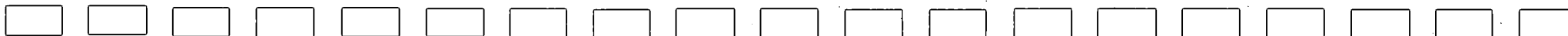
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[illegible]

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|------------------------------------|--|---|
| LAND USE cont. | <ul style="list-style-type: none"> • requirement that proponents of additional commercial and office development clearly justify demand to satisfaction of city (SNCP) • continued revitalization of CBD as a major regional commercial center (Central City Community Plan) • encouragement of public and private office development in CBD (CCCP) • full utilization of existing office structures and areas in central city (CCCP) • coordination of city plans and programs based on Central City Community Plan findings and recommendations (CCCP) • approved residential land use mix of Natomas Oaks Schematic Plan (includes Gateway Centre site) <p>e. Sacramento Zoning Ordinance provisions would require:</p> <ul style="list-style-type: none"> • rezoning to allow project land uses and protect I-5 corridor • variances for structures greater than 35 or 40 feet (depending on new zoning) | |
| POPULATION, HOUSING AND EMPLOYMENT | <p>a. Total project direct and indirect employment could range from 23,700 to 31,600 jobs (15,800 direct and 7,900 to 15,000 secondary)</p> <p>b. Project-related employment opportunities could have following effects:</p> <ul style="list-style-type: none"> • significant number of jobs would be provided near concentrations of SMSA unemployment • some project-generated jobs could be filled by persons from area's high unemployment categories with moderate training • significant opportunity to further diversify area's employment base, reducing high local dependence on declining government employment <p>c. Residential distribution of direct employment households would be throughout region. Some 30 percent of professional workers and 20 percent of nonprofessional workers likely to reside in South Natomas; other concentrations in north and south Sacramento growth areas</p> | <p>a. To offset housing displacement impacts:</p> <ul style="list-style-type: none"> • allow slight increase in average residential densities in offsite South Natomas* and/or North Sacramento communities; and/or • allow residential conversion of up to 240 acres beyond existing urbanization <p>b. To reduce general housing affordability impacts:</p> <ul style="list-style-type: none"> • consider average density increases in South Natomas* and North Sacramento • offset monthly housing costs through voluntary or mandatory residential energy conservation programs <p>* Sewer collection capacities in South Natomas are limited; density increases would probably require associated sewer improvements</p> |

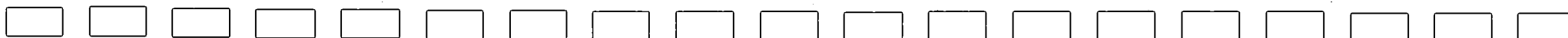
| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---|--|--|
| TRAFFIC AND CIRCULATION cont. | <ul style="list-style-type: none"> • Unacceptable LOS F/C (AM/PM) at I-5 Northbound Off-Ramp/W. El Camino intersection (A/B under SNCP) • Unacceptable LOS A/F (AM/PM) at the Natomas Oaks Dr./Garden Hwy intersection (A/A under SNCP) • Generally acceptable decreases in LOS (to C or above) at other nearby intersections <p>c. LOS ratings on roadways outside community area are not expected to be lowered by project traffic</p> <p>d. Direction of regional peak traffic flow would not change significantly from SNCP</p> | |
| PUBLIC SERVICES AND FISCAL IMPACTS | <p>a. Changes in public service needs relative to SNCP development:</p> <ul style="list-style-type: none"> • dwelling unit reductions and office space increases would result in less police service demands • fire protection costs not significantly affected • road and traffic signal maintenance needs would increase; increases partially offset by fewer miles of public streets to serve proposed uses • drainage costs would be higher; storm runoff about 50 percent higher for office uses than residential uses (added drainage costs borne by users through assessment district); drainage system capacities still adequate • proposals would require 21.5 fewer acres of public park than housing under SNCP, saving net capital park development cost of \$580,000 and annual maintenance cost of \$100,000 • proposal would reduce community school requirements by one, due to dwelling unit reductions • since new schools are financed by developer contributions and state funds, reduced school needs would have no beneficial effect for local taxpayers • conversion of site lands from housing to office use would result in a land use pattern less amenable to efficient transit service; nevertheless, service to South Natomas may be provided in some form in long-range future | <p>a. Require fair-share contributions from applicants and other new projects in area towards a vicinity capital improvements program which includes the planning, designing, and construction of road improvements recommended herein</p> |

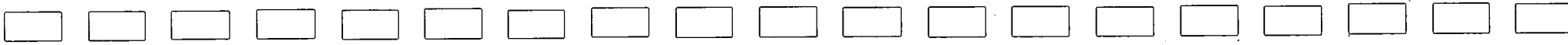
| CATEGORY | IMPACTS | MITIGATION MEASURES |
|--|---|---------------------|
| PUBLIC SERVICES AND FISCAL IMPACTS cont. | <p>b. Changes in public revenue generation:</p> <ul style="list-style-type: none"> • estimated one-time construction excise tax revenues approximately \$753,000 greater for Gateway Centre, \$926,000 for Natomas Eastside, and \$1,679,000 for combined projects • estimated one-time building permit fee revenues roughly \$60,000 greater for Natomas Eastside, \$34,000 for Gateway Centre, and \$94,000 for combined projects • one-time sewer connection fee revenues for all of South Natomas would be less with project proposals; revenue reductions not a problem since less sewage would be generated by office uses <p>c. Changes in annual tax and fee revenues:</p> <ul style="list-style-type: none"> • additional annual property tax revenues to all jurisdictions estimated at \$1.10 million from Natomas Eastside, \$690,000 from Gateway Centre, \$1.79 million total; city would receive 12 percent or \$215,000 per year (1981 dollars) • estimated annual sales tax revenues are \$64,000 greater from Natomas Eastside, \$71,000 greater from Gateway Centre; \$135,000 greater for both projects • annual state subvention revenues (population based), including motor vehicle in-lieu fees, gas tax, and cigarette tax, would diminish by \$41,000 due to Natomas Eastside, \$63,000 due to Gateway Centre; and \$104,000 with both projects • federal general revenue sharing and community development block grants would decrease by \$20,000 due to Natomas Eastside, \$31,000 due to Gateway Centre; \$52,000 with both projects <p>d. Overall, projects appear to create a net increase in one-time revenues (development fees, connection fees and costs, etc.), as compared to SNCP</p> <p>e. Annual project revenues would exceed operating costs by an estimated \$300,000 more than with the current SNCP.</p> | |



| CATEGORY | IMPACTS | MITIGATION MEASURES |
|--|---|---|
| <p>ECONOMIC GROWTH AND BUSINESS PARK DEMAND</p> | <p>a. Consideration of office demand and related site suitabilities indicate that projects at proposed location represent a good real estate prospect</p> <p>b. Project effects on regional office-commercial development might include:</p> <ul style="list-style-type: none"> • a decline in rate of office development (but not the overall level) in CBD/Capitol zone • less pressure for similar (office-oriented) projects in North Natomas-Metro Airport area and other regional locations, at least within the decade • slightly less diversification in other competing projects, i.e. less office space, especially developments proposed to include a range of business park uses (light industrial, research and development, distribution, commercial office) at locations along Highway 50 or closer to Placer Co. <p>c. Proposed rate of project office space absorption could result in adverse impacts on regional office market, decreasing space expansion absorption, and rental rates in CBD, and in suburban office concentrations throughout the region, and other regional projects</p> <p>d. CBD office space market may be established and occupied to an acceptable degree before substantial project impacts occur; main effects of any "overbuilding" in South Natomas area on CBD would occur at later date, if significant relocation of tenants occurs</p> | <p>a. Consider 10-year rather than 7-year project construction phasing to reduce effects on annual suburban (regional) and CBD office space market.</p> <p>b. Continue and increase implementation of Sacramento Central City Community Plan improvement measures (light rail connection, etc.) to reinforce CBD office market.</p> |
| <p>SOILS AND SEISMICITY</p> | <p>a. Primary soil concerns are shrink-swell and differential settling--both can be more damaging to the larger building and pavement areas associated with office-commercial development</p> <p>b. Seismic risks to structures could include the following:</p> <ul style="list-style-type: none"> • damage due to ground shaking, lateral spreading, soil compaction, lurching, and possible liquefaction--all associated with local potentials for strong ground motion; some due to high ground-water levels • potential for localized failure of channel banks due to strong ground shaking during storm flows <p>c. Dust generation would be primary soils impact during construction activities</p> | <p>a. Use standard engineering measures to reduce shrink-swell effects, differential settlement, and other potential soil impacts</p> <p>b. Require a geotechnical study to evaluate site potentials for liquefaction</p> <p>c. Require standard building code (UBC) measures to assure structural earthquake resistance</p> |

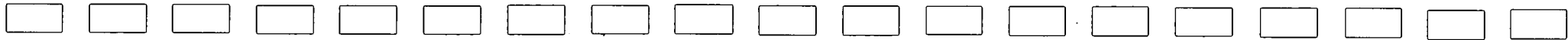
| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---------------------------------|---|--|
| DRAINAGE AND WATER QUALITY | <p>a. Fifty percent greater runoff volume likely with project, as compared with current SNCP land uses</p> <p>b. Pump station capacity sufficient to drain project sites; pump station operation increases would reduce pump service life and increase operating and maintenance costs</p> <p>c. High site groundwater levels could hamper underground utility construction and flood unprotected basements</p> <p>d. Projects would increase estimated runoff pollutants by 40 percent over SNCP; increases statistically insignificant relative to total Sacramento River loadings, but would contribute cumulatively to downstream water quality problems</p> | <p>a. Drainage recommendations include:</p> <ul style="list-style-type: none"> • prepare engineered drainage plans utilizing standard engineering approaches listed in the EIR • require 35-foot maintenance easement along Natomas Main Drainage Canal <p>b. Water quality measures:</p> <ul style="list-style-type: none"> • establish long-term, private project street cleaning program • make payments to Reclamation District 1000 for fair share of canal silt removal costs |
| AIR RESOURCES | <p>a. On a community scale, projects would increase carbon monoxide (CO) emissions at some locations over levels projected for SNCP; increases would remain below state and federal standards</p> <p>b. Project-generated gross emissions would increase about 20 percent over site-related SNCP emission projections</p> <p>c. Project would increase 1990 regional emissions inventory by 2 to 3 percent; increase would be consistent with Sacramento AQMA Air Quality Plan.</p> | <p>a. Emission increases would not affect project compliance with current regulations</p> <p>b. Project point-source impacts would be mitigated through Sacramento County Air Pollution Control District "Authority-to-Construct" permit process</p> |
| VISUAL AND OTHER DESIGN FACTORS | <p>a. General effects on site and vicinity:</p> <ul style="list-style-type: none"> • South Natomas community would be perceived as three distinct areas, due to contrasts in project building scales rather than as one homogeneous residential community bisected by a freeway • main drainage canal visual values could be adversely affected by Natomas Eastside development • future residential development along Natomas Oaks Drive opposite Gateway Centre could have direct views into office areas, and be exposed to views from offices (loss of privacy) <p>b. Effects on I-5:</p> <ul style="list-style-type: none"> • I-5 corridor between I-880 and American River would be perceived as extension of central city commercial-industrial landscape, diffusing threshold effect of river • SNCP possibilities for a visually balanced I-5 entry corridor would be reduced | <p>a. Specific design measures are described in EIR for:</p> <ul style="list-style-type: none"> • project visual compatibility with surrounding uses • drainage canal parkway treatments (Natomas Eastside) • I-5 corridor treatments • I-880 corridor treatments • Garden Highway treatments • rooftop mechanical equipment screening • exterior lighting design • specific onsite Natomas Eastside design concerns • specific onsite Gateway Centre design concerns |





| CATEGORY | IMPACTS | MITIGATION MEASURES |
|---------------------------------------|--|---------------------|
| VISUAL AND OTHER DESIGN FACTORS cont. | <ul style="list-style-type: none">• southbound I-5 views along project frontages would be dominated by corporate office building scales; views of tree-lined riverbank would be blocked by office and commercial structures <p>c. Effects on I-880:</p> <ul style="list-style-type: none">• similar to effects on I-5• shallow office building setbacks in combination with heights up to 6 stories could create visual intrusion on freeway• freeway would remain as northern edge of Sacramento urbanization, as under current SNCP <p>d. Effect on Garden Highway:</p> <ul style="list-style-type: none">• perception of entering riverside residential area from I-5 would be reduced to disadvantage of Natomas Oaks, Swallows Nest, and other residential areas• elevation difference between Garden Highway and Gateway Centre could expose rooftop mechanical equipment to view• possible loss of mature trees at south end of Gateway Centre site <p>e. Effects on West El Camino Avenue:</p> <ul style="list-style-type: none">• projects' more uniform architectural landscape could be a visual improvement over SNCP mixed-scale commercial-residential pattern <p>f. All elevated freeway interchanges would provide overviews of project rooftops and mechanical equipment</p> <p>g. Project relationship to current city design policies and concerns:</p> <ul style="list-style-type: none">• no apparent coordination by two projects in I-5 corridor landscape treatments• Natomas Eastside preliminary plans do not detail Main Drainage Canal landscape treatments <p>h. Onsite design considerations:</p> <ul style="list-style-type: none">• differences in building footprints between two projects, plus separating transmission line corridor, would create perception of two, or perhaps three, business park projects, rather than one integrated development | |

| CATEGORY | IMPACTS | MITIGATION MEASURES |
|-------------------------|---|--|
| ENERGY | <p>a. Project operation and related transportation energy consumption combined would be approximately 78 percent greater than SNCP development</p> <ul style="list-style-type: none"> • operations energy consumption would be about 60 percent higher than development under SNCP • annual project-related transportation energy consumption would be approximately 90 percent greater than development under SNCP <p>b. Projects would require over 40 percent more energy to construct than SNCP development</p> | <p>a. All new commercial-industrial construction must meet state's minimum energy conservation standards (Title 24, California Administrative Code)</p> <p>b. Measures beyond those mandated by Uniform Building Code and Title 24 should also be considered, including:</p> <ul style="list-style-type: none"> • preparation of project-specific, energy conservation programs, subject to review by SMUD and PG&E and approval by city • set of energy conservation criteria could be included in CC and Rs and considered in design review (suggested measures listed in this EIR) |
| VEGETATION AND WILDLIFE | <p>a. Impacts identified in SNCP EIR still applicable with projects include:</p> <ul style="list-style-type: none"> • losses of agricultural and grassland habitats • adverse changes in species population and diversity • potential removal of riparian vegetation or replacement with exotic species • potential destruction of mature trees • alterations to giant garter snake's riparian habitat • potential removal of mature trees on Gateway Centre site <p>b. Natomas Eastside lake would have potentials for impacts including:</p> <ul style="list-style-type: none"> • consumption of algalicides • creation of slight nuisance and health problems related to insect vectors and waterfowl botulism | <p>a. SNCP EIR lists general mitigation measures applicable to projects, including:</p> <ul style="list-style-type: none"> • drainage canal parkway designation • preservation of riparian habitats • protection of mature trees • protection of giant garter snake habitat <p>b. Additional specific measures recommended in this EIR include:</p> <ul style="list-style-type: none"> • provision of a landscaped parkway along drainage canal frontage (Natomas Eastside) • mature tree preservation • design, operation, and maintenance measures for Natomas Eastside lake <p>c. Recommended construction period measures include recommendations for protection of snakes and mature trees</p> |
| ARCHAEOLOGY | <p>a. 1978 field reconnaissance revealed no archaeologically significant onsite cultural materials</p> <p>b. Potentials for discovery of subsurface cultural deposits during construction activities remain</p> | <p>a. Measures are listed in EIR in event subsurface cultural deposits are discovered during construction</p> |



D. LAND USE

The land use impacts of the proposed Natomas Eastside and Gateway Centre projects are described in this section, including relationships to metropolitan and local land use patterns, compatibility with existing and anticipated nearby land uses, and consistency with local land use policies and regulations.

I. EXISTING SETTING

a. Metropolitan Land Use Pattern

The project sites are situated on the northwest fringe of the Sacramento metropolitan area, three to four miles from the central business district (CBD).

The metropolitan land use pattern is diagrammed in Figure 5. Rivers and freeways are the main determinants of the urban pattern in the Sacramento metropolitan area. The CBD, the historic urban focus of the area, is situated at the confluence of the American River with the Sacramento River. The north-south flowing Sacramento River is essentially the western boundary of the urban area. Urbanization has extended from the CBD 15 to 20 miles northeast along Highways 80 and 50 and the American River toward the towns of Roseville and Folsom. In addition, urbanization has extended south approximately 10 miles from the CBD along U.S. Highway 99 and the Sacramento River.

The CBD is the urban core of the metropolitan area. It includes concentrations of commercial businesses, private-sector and government offices, large-scale industry, railroad termini, and other distribution activities. Other commercial activities are dispersed throughout the metro area in shopping centers and strip development.

Comparable Business Park Areas. Major concentrations of existing and planned business park areas comparable to the proposed projects are located in three general areas, as diagrammed on Figure 5. The largest is the Highway 50 area on the south side of U.S. Highway 50 between the Sacramento Army Depot and Sunrise Boulevard. The next largest area is in the West Sacramento area, including the Port of Sacramento, on the opposite side of the Sacramento River from the CBD. Closest to the site, the third concentration is the North I-880 area, northeast of the I-5/I-880 interchange. This location includes roughly 800 acres of existing industrial park (both sides of Northgate Boulevard) plus the North Natomas area, and has been subject to numerous recent industrial park development proposals (North Natomas).

b. Site and Vicinity Land Use

The local land use setting is shown in a recent aerial photograph on Figure 6. The project sites and their immediate vicinity are separated from surrounding land uses

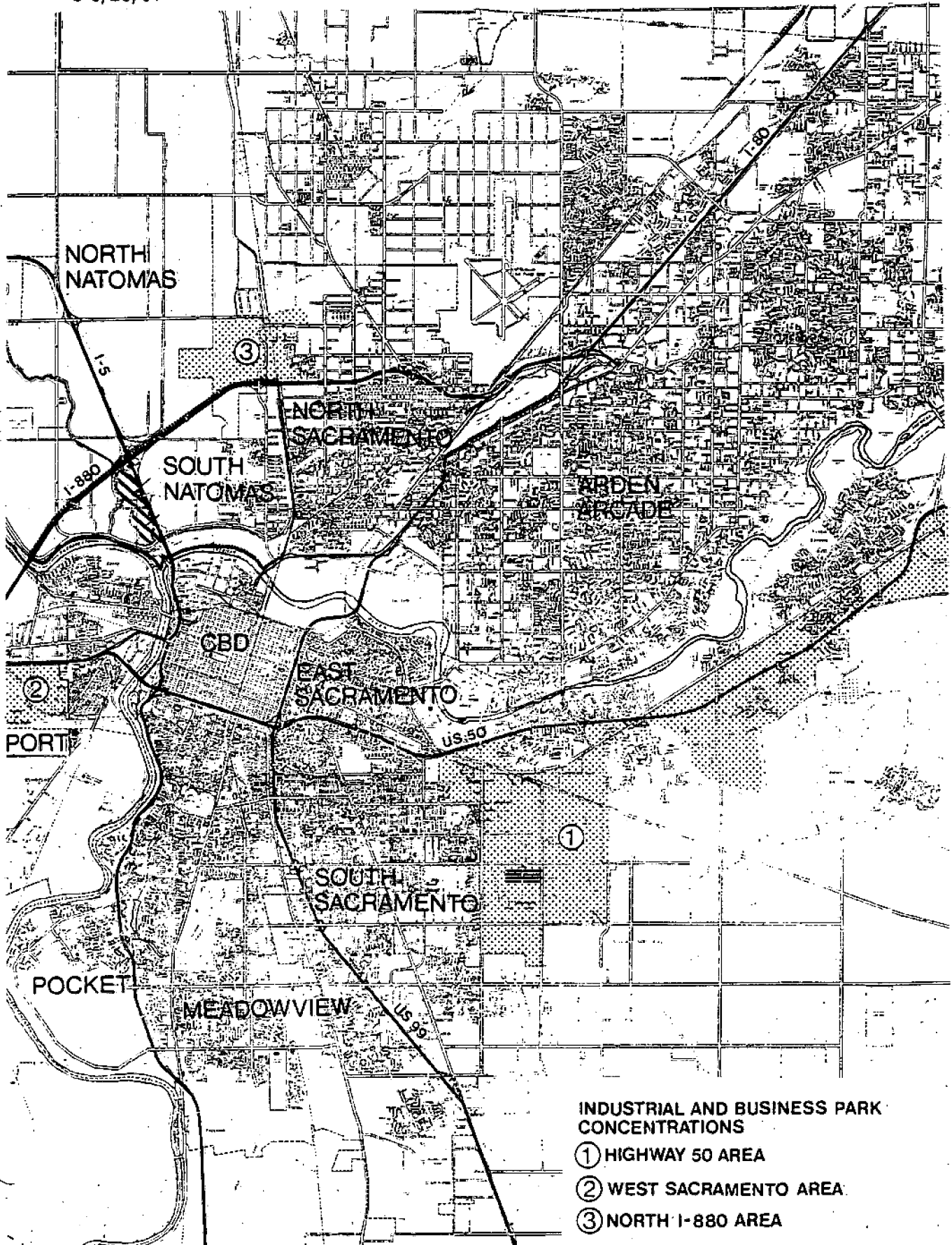
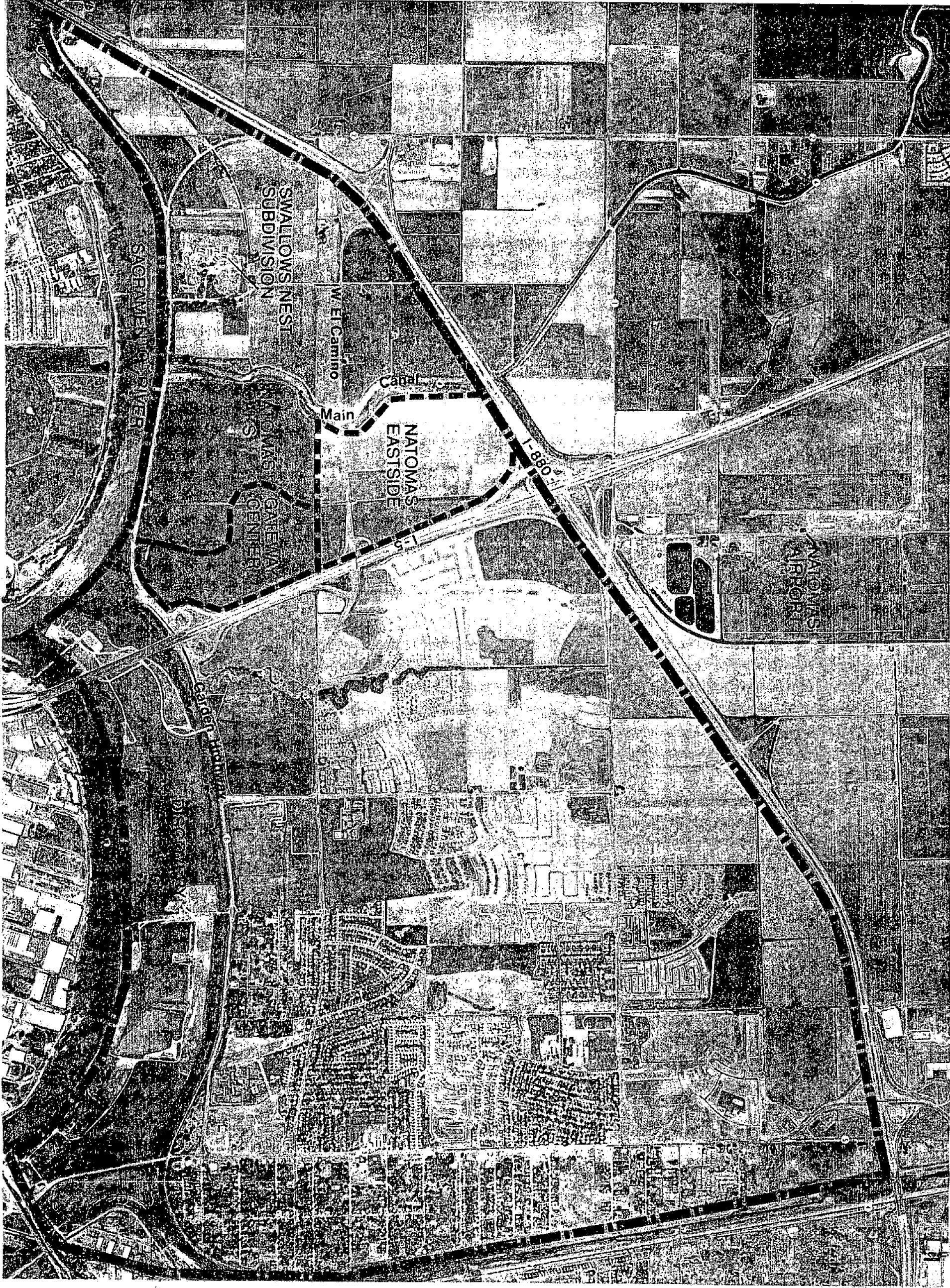


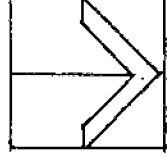
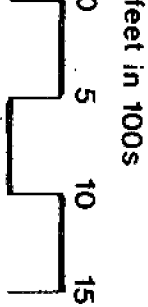
FIGURE 5
METROPOLITAN LAND USE PATTERN



— ■ — SOUTH NATOMAS
COMMUNITY PLAN
AREA BOUNDARY

--- SITE BOUNDARIES

FIGURE 6
EXISTING LOCAL
LAND USE



by I-880 on the north, I-5 on the east, the American and Sacramento rivers on the south, and the Natomas Main Drainage Canal on the west.

(1) Site Land Uses. Existing onsite improvements include a cluster of mobile homes (5) and related structures (1300 Garden Highway) located under a tree canopy east of the intersection of Garden Highway and the new Natomas Oaks Drive. The remainder of the site is in productive agricultural use including row crops and grasses.

(2) Adjacent Lands--East and West (South Natomas). Existing land use in the South Natomas area is shown on Figure 6. Roughly 20 percent of the area was urbanized prior to 1960, including approximately 2,280 residential units. Very little development activity occurred between 1960 and 1976.

Since 1976, the area has experienced a rapid increase in the rate of urbanization, becoming the most active community in the metropolitan area in terms of residential units added. Between 1976 and 1981, roughly 2,330 additional residential units were constructed (1,750 single family, 580 apartments). An additional 9,580 units have been approved for construction in the area. Existing and approved residential units total approximately 14,190.

West Side. Most of South Natomas area west of I-5, including the project site, remains in agricultural use--primarily grasses and row crops. An exception is the Swallows Nest residential subdivision. Begun in 1979, the project reached 152 units in December 1980; a total of 207 units are approved.

The 265-acre Natomas Oaks project is the only other approved subdivision on the west side. The tentative map (shown later in this section on Figure 10) was approved in May 1980. Construction of Natomas Oaks Drive began in March of 1981. Completion of the first model homes is scheduled for 1982. To date, no residential construction has occurred in Natomas Oaks.

East Side. As shown in Figure 6, the majority of South Natomas urbanization to date has occurred in the area east of I-5. More than half of the 3,100-acre east area of South Natomas had been urbanized by 1980, including approximately 4,030 units of single family and 580 of apartment residential.

(3) Adjacent Lands--North. Lands opposite Interstate 880 from the Natomas East-side site are in agricultural use--primarily field crops production.

(4) Adjacent Lands--South. Land uses opposite Garden Highway from the Gateway Centre site include the western tip of Discovery Park, plus a narrow riverfront area of river-oriented roadside uses, including an old storage facility (Village Boats Barn) directly opposite the intersection of Garden Highway and the new Natomas Oaks Drive, and an eating and drinking establishment (the River Saloon).

(5) Other Significant Nearby Land Uses. The Natomas Airport on the northern boundary of South Natomas (See Figure 6) is a privately-owned airport which provides both flying instruction and agricultural aviation services. The facility is roughly 1.9 air miles from the project sites.

c. Local Policies and Regulations Applicable to the Projects

Land in the area of the proposed project sites is subject to use policies set forth in the City of Sacramento General Plan, the South Natomas Community Plan, the Natomas Oaks Master Plan, the Central City Community Plan, and SRAPC airport guidelines for Natomas Airport. Development on the project sites is also subject to regulations established in the City of Sacramento Zoning Ordinance.

Project relationships to policies and regulations set forth in these plans are described later in this section.

2. IMPACTS

The proposed land use changes and conceptual site plans for the two project sites are shown on Figures 3 and 4 and quantified on Tables 3 and 4.

a. Metropolitan Land Use Pattern

General. The proposed project sites are situated in an area of the city planned predominantly for residential uses. Current policy is to provide housing in close proximity to the CBD.

Commercial and office uses have been widely scattered around the metro area in relatively small nodes for neighborhood and community support purposes, as illustrated in Figure 7. Such commercial and office uses reinforce residential uses and do not alter the primary function of the CBD.

The following interrelated metropolitan land use impacts can be anticipated with approval of the proposed land use changes:

- The introduction of regional-scale business parks into the South Natomas area would reduce its ability to function as a residential concentration in close proximity to the central city.
- On a citywide scale, the total planned area for residential uses would be reduced by 2 percent (See Table 5). The total planned area for commercial and office uses would increase by 4 percent (See Table 5).
- Approval would officially initiate development of a fourth concentration of business park activity in the metropolitan area.
- The projects would represent the first major extension of office-commercial land use into the largely undeveloped, freeway-served Natomas area.
- Approval of the projects and construction of related infrastructure improvements would generate additional interest in further development and intensification of designated Natomas urban areas, and in the conversion of more Natomas area agricultural lands to urban uses.

Table 5
RELATIONSHIP OF PROPOSED PROJECTS TO CITY LAND USE PATTERN

| <u>Land Use</u> | <u>Estimated Vacant Designated Land in the City (acres)</u> | <u>Anticipated Changes with Project Approval (gross acres)</u> | <u>Net Avail- able Land after Project Approval</u> | <u>Percent Change</u> |
|----------------------------------|---|--|--|---------------------------|
| Residential | 10,000 (a) | -202 | 8,800 | (-) 2% |
| Commercial/Office/ Industrial | 4,500 (b) | +201 | 4,700 | (+) 4% |

(a) Includes non-constrained, moderately constrained, and regulation-restricted land as indicated by the General Plan Update Technical Report #1 (August 1981)

(b) City Planning Department (Carstens) memorandum, April 15, 1981, re: Vacant Non-Residential Land Inventory Sheet (4,439.4 ac. rounded to 4,500 ac.)

b. Effects on Site and Vicinity Land Use

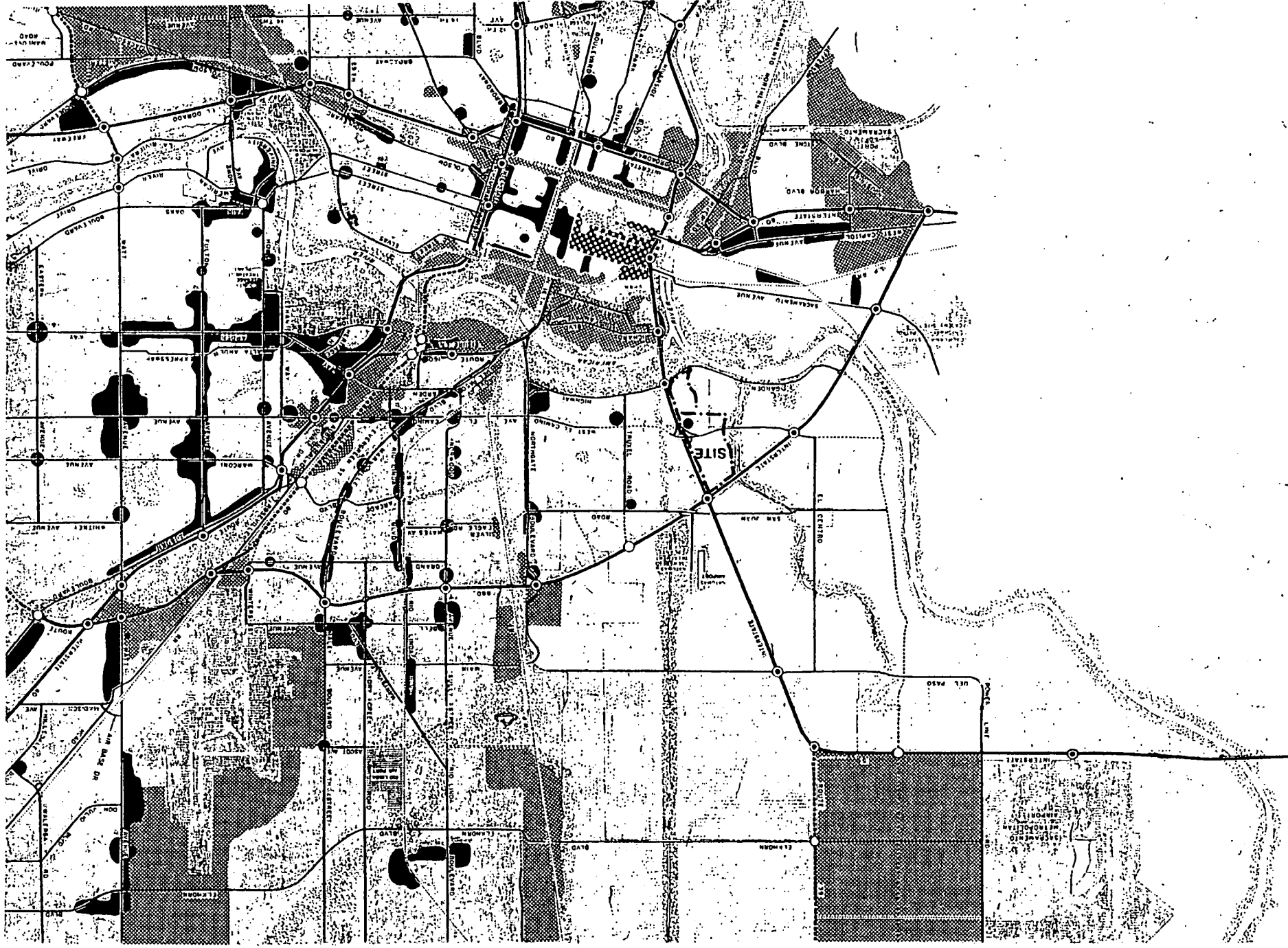
(1) Site. The impact of the projects in displacing existing agricultural and residential (mobile home) land uses would be similar to the effects of the adopted community plan.









(2) Adjacent Lands--East and West. The rapid residential development trend in the South Natomas community, relative to other areas of Sacramento, would continue. In response to the projects, in combination with the area's proximity to the CBD, pressures would increase for buildout and intensification of the approved (subdivided) and planned dwelling unit capacity of the area (now at approximately 9,600 and 7,500 units, respectively).

East Side. Under current city policies, roughly 10,300 additional units could be accommodated in the east area, resulting in a total (including existing units) of around 14,900 units at an average density of between 7 and 8 units per acre. Pressures to raise this density in the remaining unbuilt areas on the east side of I-5 can also be anticipated with the projects.

West Side. If the projects were approved, the development capacity of the unbuilt areas on the west side of South Natomas, including the net loss of residential units due to displacement by the projects (roughly 1,800 units), would amount to approximately 3,860 units at an average density of around 6.5 units per acre (excluding the approved Swallows Nest subdivision, now under construction).

In response to approval of the business park projects, applications can be anticipated to change current land use policy for the west side of I-5 in order to: (a) allow development of secondary office, commercial and distribution uses; and (b) to increase residential densities on remaining residential areas, replacing extensive



-  RESIDENTIAL
-  COMMERCIAL AND OFFICES
-  CENTRAL BUSINESS DISTRICT
-  INDUSTRIAL
-  MAJOR RECREATION OR OPEN SPACE AREAS
-  MAJOR PUBLIC/COMMERCIAL-PUBLIC AND TRANSPORTATION FACILITIES
-  AGRICULTURE-URBAN RESERVE
-  PERMANENT AGRICULTURE

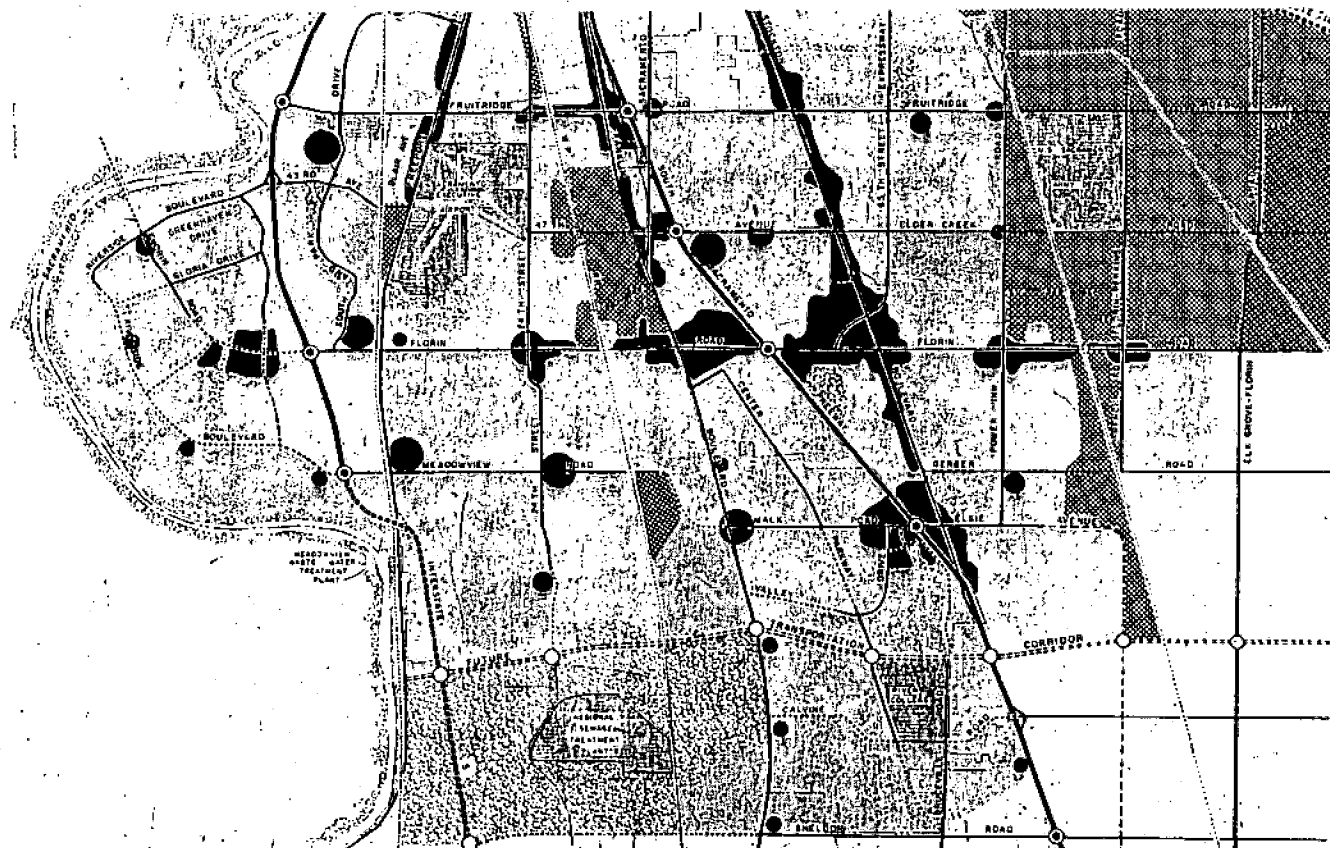
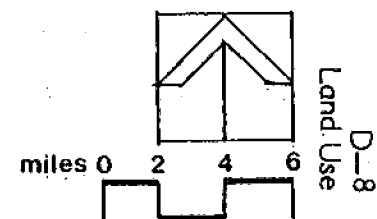


FIGURE 7
1974 GENERAL PLAN
CITY OF SACRAMENTO



single-family designations with more townhouse, cluster and multifamily designations.

The applicant's proposal to improve Garden Highway between I-5 and Orchard Lane to a four-lane divided road would probably require removal of the Village Boats barn, and would reduce roadside (riverfront) businesses, would restrict turning movements here, reducing opportunities for recreational use of the riverfront district on the south side of the route.

3. RELATIONSHIP OF PROPOSED LAND USE CHANGES TO LOCAL POLICIES AND REGULATIONS

a. City of Sacramento General Plan

The City of Sacramento General Plan (CSGP)¹ includes goals and policies to improve and conserve existing urban development and encourage and promote quality growth. CSGP goals related to the projects involve considerations of city identity, housing needs, transportation needs, economic viability, recreation needs, social and commercial services needs, and the management of city land, water, air, and other ecological resources.

Land use designations set forth in the plan are shown on Figure 7. The general plan designates the project sites for a mix of residential, commercial, and office uses, plus a school and fire station.

As Figures 6 and 7 illustrate, I-880 has been designated in the SCGP as the separator between Sacramento urbanization to the south and agricultural-urban reserve to the north.

City General Plan policies most relevant to consideration of the projects are paraphrased, and project relationships to those policies are described below:

Policies

(1) Support development projects directed at retaining and improving the role of the Central Business District as the major retail-trade and financial center for the region. (Commercial policy #1, Land Use Element)

(2) Prevent incompatible commercial or industrial development adjacent to the American and Sacramento River Parkways and, in particular, prevent incompatible visual intrusion into the American River Parkway. (Commercial policy #8, Land Use Element.)

Project Relationships

Potentially Non Conforming. Proposed land use mix would not attract extensive major retail to the project sites, but would provide additional market support for these CBD activities. On the other hand, extensive project office space may create a concentration of financial activity outside the CBD.

Conforming. Land use conflicts between commercial-office uses at the southern end of Gateway Centre and visual/recreational values of Discovery Park would be effectively buffered by the elevated Garden Highway levee route.

b. 1978 South Natomas Community Plan

In response to increasing development pressures on South Natomas, a community plan was first prepared for the area in 1962 and revised in 1965. The plan was formulated to implement and expand upon general policies for the area established in the 1974 CSGP.

The 1978 South Natomas Community Plan (SNCP) is an update and revision of the 1965 community plan.² General goals of the SNCP include consideration of (1) urban development timing relative to availability of infrastructure capacity, (2) protection of the aesthetics and utility of existing development, (3) assurances of beneficial new development, and (4) harmony between development and the area's physical setting.

Current Land Use Designations. SNCP land use designations for sites and vicinity are shown on Figure 8. Acreage allocations for the sites and total SNCP planning area are summarized in Table 6.

As the figure and table show, the predominant land use designations for the remaining undeveloped South Natomas areas are residential. Most other uses--commercial, offices, parks, schools--are designated to support the residential areas. Provisions for "basic" employment activities (non-local-serving businesses) are limited. Such regional uses are currently directed towards the central city and the three office park concentrations described earlier in this section (2-a).

Effect of Proposed Projects on SNCP Land Use Allocations. A comparison of 1978 SNCP land use policy with changes requested to accommodate the proposed projects is illustrated by Figures 8 and 9. Project changes to South Natomas land use allocations are quantified in Table 7.

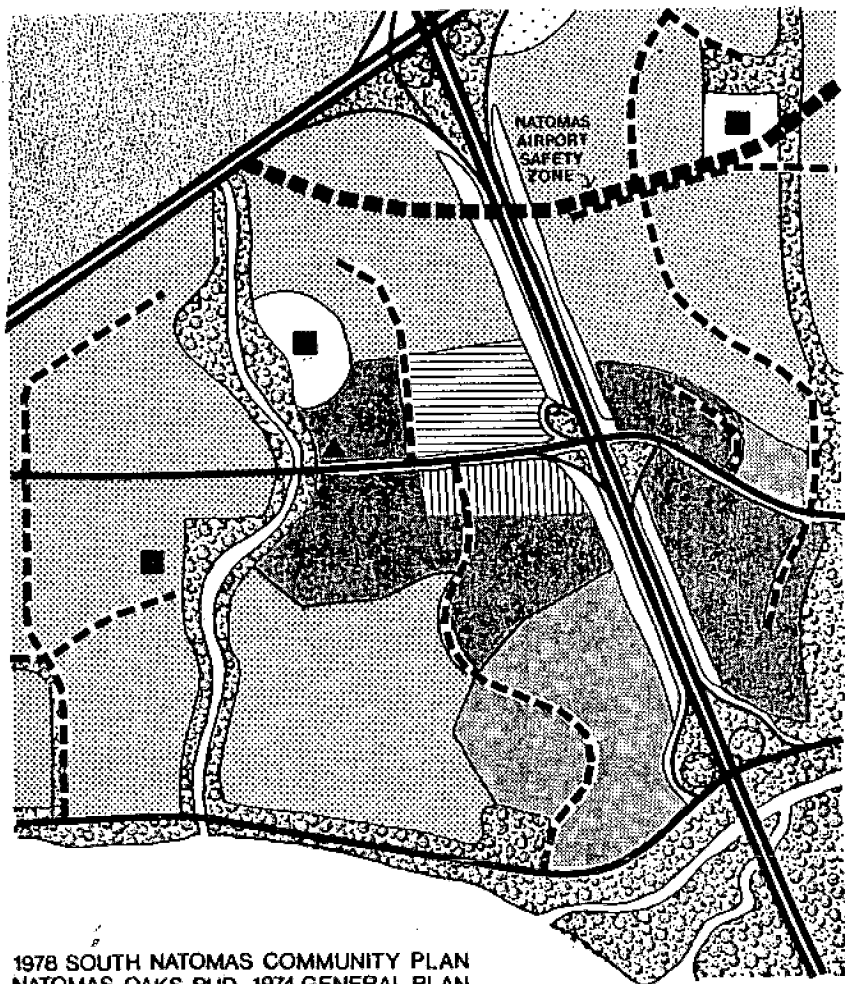
In summary, approval of the proposed plan amendments would result in the following changes to the 1978 SNCP land use pattern:

Residential. The conversion of the project sites to office uses would reduce the planned residential land area in the community by 7 or 8 percent (Table 7), or by about 1,800 housing units (2,255 from Table 6 minus 468 replaced by Natomas Eastside). 1,800 housing units would represent roughly 8 percent of the SNCP total (21,663 units).

Offices. The proposed projects would increase the land area designated in the SNCP for office development by five times (514 percent from Table 7).

The proposed scale of office space development and the marketing efforts planned by the applicant are directed towards corporate offices of regional significance ("basic" employers) rather than the community-serving office uses envisioned in the 1978 plan.

Commercial. The area of commercial uses in the community would be increased by 21 acres or roughly 18 percent of the community-wide total.



1978 SOUTH NATOMAS COMMUNITY PLAN
NATOMAS OAKS PUD, 1974 GENERAL PLAN

FIGURE 8
CURRENT LAND USE POLICY
SITE VICINITY

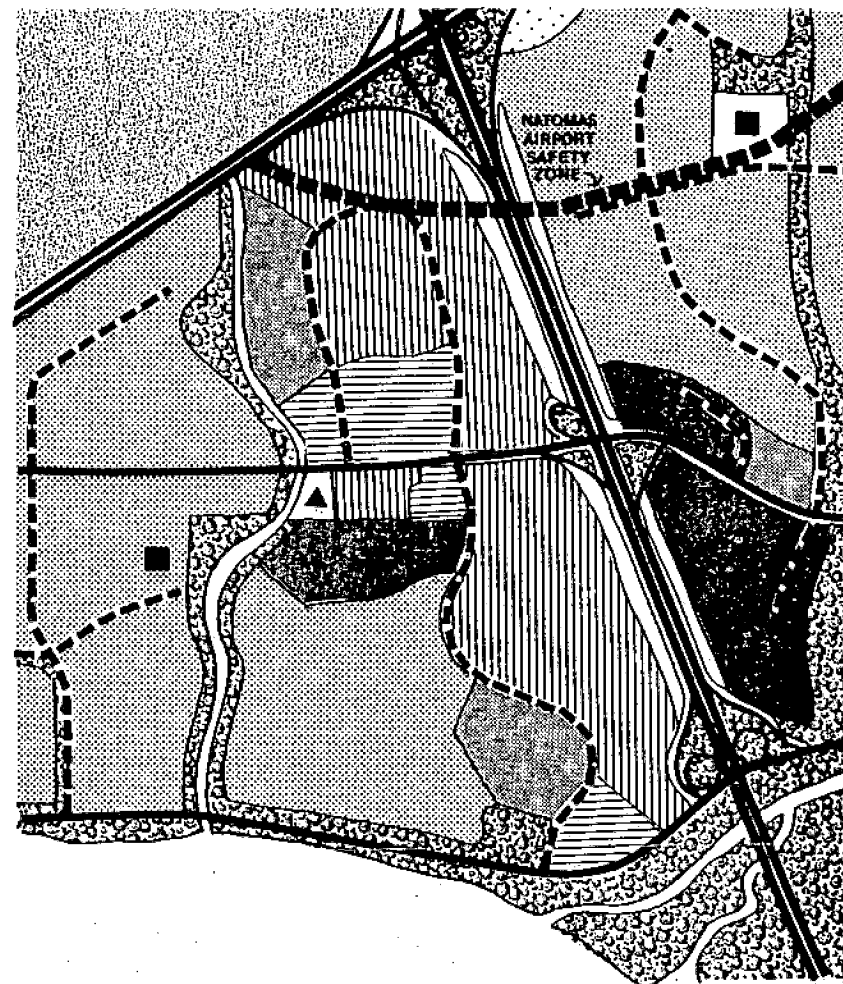


FIGURE 9
PROPOSED LAND USE POLICY
SITE VICINITY

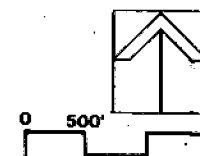


Table 6
PORTION OF SOUTH NATOMAS COMMUNITY PLAN LAND USE DESIGNATIONS
WITHIN PROJECT SITES (EXISTING CONDITION WITHOUT PROPOSED LAND
USE CHANGES)

| Land Use | Gross Acres | | Site Portion of Plan Total (%) | Dwelling Units | |
|--|----------------------------|----------------------------|-----------------------------------|----------------|---------------|
| | Plan Total ^a | Site Total ^b | | Plan Total | Site Total |
| Residential | | | | | |
| Low density (9 dus or less/acre) | 2170 | 124 | (5.7) | -- | 641 |
| Medium & High Density | 779 | 102 | (13.1) | -- | 1,614 |
| Total | 2949 | 226 | (7.7) | 21,663 | 2,255 |
| Commercial--neighborhood and community | 117 | 26 | (22.2) | | |
| Business and professional offices | 352 | 19 | (5.4) | | |
| School | 147 | 10 | (6.8) | | |
| Fire station | -- | 1.5 | -- | | |
| Parks, open space, drainage canals, streets, etc. | 1292 | 0 | 0 | | |
| TOTALS | 4540 | 282.5 | (6.2) | | |

^aSNCP, p. 16.

^bTotalled from City Planning Department data, July 14, 1981, revisions to April 24, 1981, memo re: project alternatives; "No Project" table.³

The character of the project commercial components could differ significantly from other South Natomas commercial development. Rather than the neighborhood-serving commercial uses envisioned for the Natomas Eastside site in the plan--i.e., supermarkets, drugs, variety, personal services, etc., project commercial areas by virtue of their internalization within a business park environment, would tend to be those supportive of business activities, i.e. motels, restaurants, business supplies and services, etc.

Schools. The area planned for school sites in the SNCP would be decreased by one 10-acre site or 7 percent of the community total (Table 7). This reduction is roughly consistent with the proposed 8 percent reduction in housing units.

Table 7
PROJECT RELATIONSHIP TO SOUTH NATOMAS COMMUNITY PLAN POLICY

| Land Use Category | 1978 SNCP Total Area (Gross Acres) ^a | Changes to 1978 SNCP with Proposed Projects ^c | | | | Total w/Both Projects | |
|------------------------|---|--|-----------------------|-----------------------------|-----------------------|-----------------------------|-----------------------|
| | | w/Natomas Eastside | | w/Gateway Centre | | Total Area | |
| | | Total Area (Gross Acres) | % Change from SNCP | Total Area (Gross Acres) | % Change from SNCP | Total Area (Gross Acres) | % Change from SNCP |
| Residential | 2949 | 2849 | -3.4 | 2847 | -3.5 | 2724 | -7.6 |
| Commercial | 117 | 127 | +8.5 | 126 | +7.7 | 138 | +17.9 |
| Office | 35 | 136 | +288. | 114 | 226. | 215 | +514. |
| Highway Commercial | 14 | 14 | 0 | 14 | 0 | 14 | 0 |
| Industrial | 30 | 30 | 0 | 30 | 0 | 30 | 0 |
| Open Space | 819 | 819 | 0 | 819 | 0 | 819 | 0 |
| Schools | 147 | 136 | -6.8 | 147 | 0 | 136 | -7.1 |
| Public Safety Facility | 0.5 | 1.5 | +200 | 0.5 | 0 | 1.5 | +200 |
| Riverfront District | 28 | 28 | 0 | 28 | 0 | 28 | 0 |
| Freeways and Streets | 401 | 401 | 0 | 401 | 0 | 401 | 0 |

SOURCES:

^aGross acreages from 1978 South Natomas Community Plan

^bMemorandum from City Planning Department re: Alternatives, July 14 revisions to April 24, 1981 data (gross acreages estimated from net figures)⁴

^cFrom Table 59

Conclusion. Although the predominant South Natomas land use would remain residential (60 percent of the land area with project approval as compared to 65 percent under the current plan), the overall effect of plan amendment approval would be a change in west side land use from a single-purpose residential to a mixed-purpose residential/regional commerce character.

SNCP Policy Relationships. Community Plan objectives and policies most relevant to the projects are paraphrased and project relationships to those objectives are described below:

Objectives

- (1) Prohibit intrusion of incompatible land uses and disruptive traffic into new and existing residential areas.
- (2) Limit commercial and office development to neighborhood and community services and retail sales. Do not permit regional scale developments, especially those which compete with the CBD.
- (3) Limit industrial development to the subarea presently zoned for this use; and insure that the design reduces the potential for conflict with adjacent residential use.

Specific Policies

- (1) Require proponents of additional commercial and office development to clearly justify the demand to the satisfaction of the planning commission and the city council.
- (2) Prohibit commercial and office land uses not designated on the plan map.

Project Relationships

Nonconforming. Designated Natomas Oaks townhouse (R-1A) uses along Natomas Oaks Drive could be adversely impacted by incompatible project land uses and related office/commercial traffic.

Potentially Nonconforming. The proposed 98,000 sq.ft. of general commercial represents a neighborhood/community serving scale of activity. Office space, depending on the type of tenant, could complement or directly compete with downtown (see ECONOMICS section).

Conforming. No heavy industrial uses would be permitted under the proposed business land use categories (C-2,OB).

Project Relationships

Nonconforming. The applicants have not submitted market studies justifying the demand for 3.4 million sq.ft of additional office space, roughly 30 percent of the projected 1980-1990 increase over existing and approved office space in the metropolitan area.

Nonconforming. Purpose of current application is to change land use map to designations consistent with the proposed Natomas Eastside and Gateway Centre site plans.

(3) Promote firms within the designated area which offer high volume employment opportunities to local residents, particularly those of the Gardenland area east of Northgate Boulevard.

Conforming. An estimated 30 percent of project permanent employees are expected to reside in the Northgate/Gardenland area (see POPULATION HOUSING AND EMPLOYMENT section).

(4) Developers will provide the necessary noise walls/berms along the corridor boundary as their projects are constructed, or earlier if possible.

Conforming. Adequate noise buffering would be required as a condition of project approval.

(5) Carefully evaluate the impact of all future development upon Garden Highway and West El Camino Avenue in the vicinity of I-5 freeway.

Conforming. Evaluations are provided in the TRANSPORTATION section of this report. Impacts would be severe.

(6) Establish an open space parkway corridor on both sides of the Natomas Main Drainage Canal (using design criteria presented in SNCP).

Partially Conforming. The Natomas Eastside site plan indicates an open space corridor as required. Project landscaping particulars have not been submitted at this preliminary plan stage. Preliminary site plan schematics do not show specific canal corridor treatments--parkways, bikepaths, etc.

(7) Provide a new fire station on West El Camino Avenue near the Natomas Main Drainage Canal; the construction to occur when warranted by new development east of I-5 freeway.

Conforming. The preliminary Natomas Eastside site plan includes a 1.5-acre fire station site.

c. Sacramento Central City Community Plan

The proposed South Natomas business parks would be within 3 miles of downtown Sacramento. Because of this proximity, planning policies for the development and revitalization of the downtown area are relevant to consideration of the projects.

The primary goal of the Central City Community Plan (CCCP) is continued revitalization of the Sacramento central city area as a viable living, working, shopping, and cultural environment with a full range of day and night activities.⁵ Supplementary goals relevant to the proposed action and project relationships to those policies are summarized below:

Policies

- (1) Continue revitalization of the CBD as a major regional commercial center.
- (2) Encourage public and private office development, where compatible with the adjacent land uses and circulation system, in the CBD.
- (3) Maintain and encourage quality public and private office developments in selected areas of the central city.
- (4) Encourage full utilization of existing office areas in the central city.

Project Relationship

Potentially Nonconforming. Large-scale development of offices near, but outside, the CBD could divert or dilute office space demand to the detriment of new construction and revitalization goals. Such an impact would occur if market overlaps developed between the type of office space users attracted to the projects and the type normally attracted to central city office space, or if the supply of new central city office space in combination with South Natomas office construction significantly exceeded the annual growth in demand for office space.

Comparisons of office space market and demand characteristics described herein under ECONOMICS indicate that, based on the stated market objectives of the project applicants to meet "suburban" office demands--i.e., to provide space primarily for major corporate tenants requiring extensive space with significant on-site expansion possibilities and convenient support space (distribution, research, etc.) --the project will not compete directly with conventional downtown commercial office space. Nevertheless, the project could create a drag* on CBD and other metropolitan office markets, particularly if buildout occurs over 7 years as proposed.

If the applicants are not successful in attracting 3.4 million sq.ft. of the "suburban" office user types described in their initial market objectives, they may change their marketing emphasis to provide more

*would tend to retard office absorption rates and rental prices

conventional commercial-office space. Such a change in current marketing strategies for the two projects could create direct competition with the CBD, reducing the feasibility of public and private office development in the central city.

(5) Protect and enhance unique visual features in the area including entrances into the central city.

Conforming. Projects provide an opportunity similar to SNCP-designated residential uses to formalize the I-5 entrance to downtown Sacramento (see VISUAL section herein).

(6) Encourage rehabilitation, maintenance, and utilization of existing structures where feasible and where a savings of natural resources may be realized by not building a new structure.

Potentially Nonconforming. See 1 and 2 above.

(7) Encourage coordination of city plans and programs based on findings and recommendations of the Central City plan.

Potentially Nonconforming. See 1 through 4, and 6 above.

d. Sacramento River Parkway Master Plan

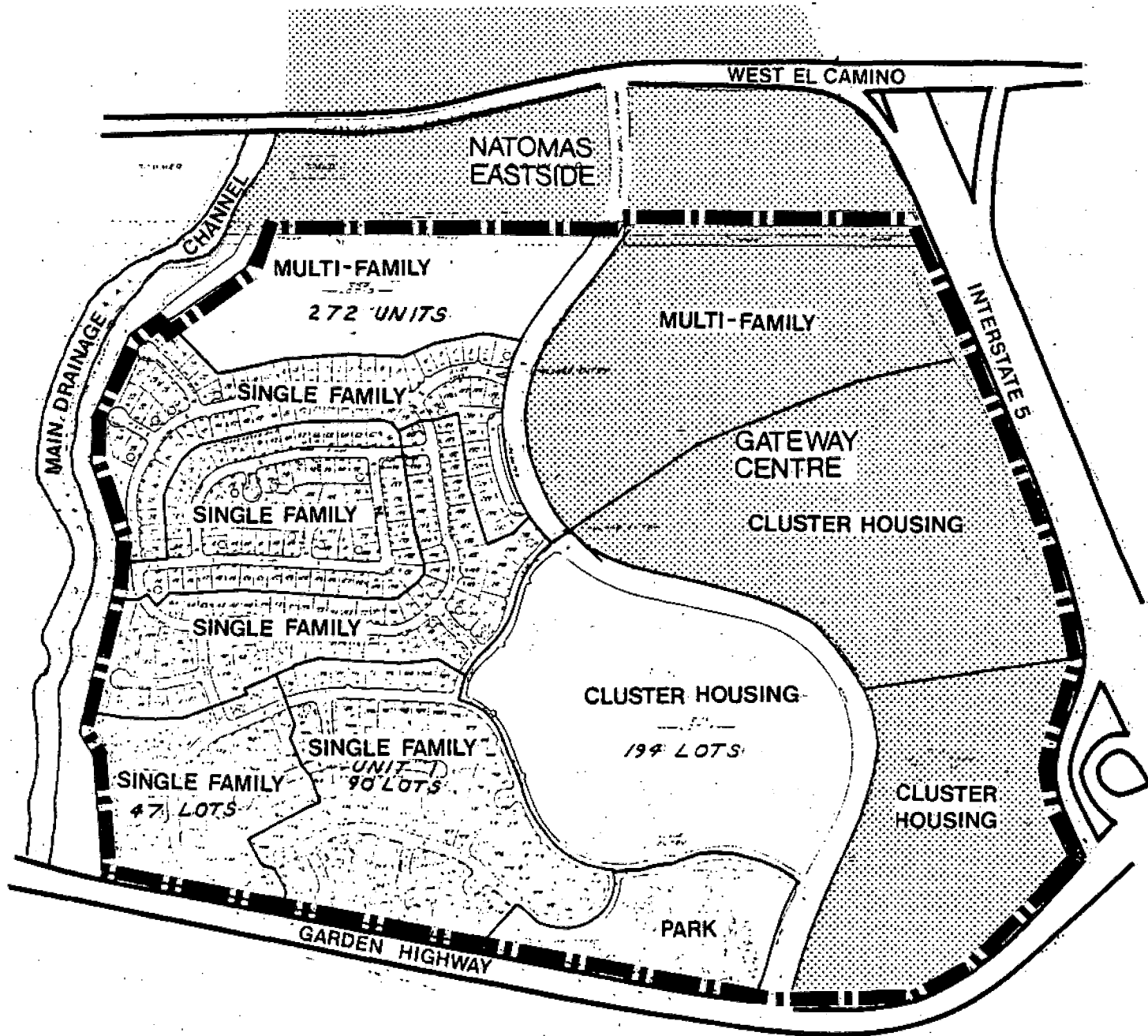
The river master plan was prepared to assess the feasibility of the Sacramento River Parkway and provide a plan and impact study for the parkway.⁶ The plan considers use of lands within and adjacent to the designated planning area, shown on Figure 6. The area consists primarily of the east bank of the Sacramento River from the Jibboom Street Bridge at the confluence with the American River to the southern city limit in the Freeport area.

The Gateway Centre site is separated from the Sacramento River by the Garden Highway and associated levee; neither the site nor its nearby river frontage are within or adjacent to the parkway planning area.

e. Natomas Oaks Approved Schematic Plan

In 1979, entitlements were granted as necessary to establish a planned unit development (PUD) on a 265-acre portion of the South Natomas Community planning area. The portion includes the 90-acre Gateway Centre site.

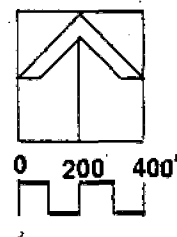
The Natomas Oaks PUD tentative map is shown on Figure 10. As shown, the Natomas Oaks PUD is generally bounded by West El Camino Avenue on the north, I-5 on the east, Garden Highway on the south, and Natomas Main Drainage Canal on the west.



■ ■ ■ ■ Natomas Oaks PUD Boundary

▤ ▤ ▤ ▤ Proposed Projects

FIGURE 10
NATOMAS OAKS TENTATIVE MAP



Policy

Table 8 summarizes the 1980 Natomas Oaks PUD land use breakdown, and the portion of each land use falling within Gateway Centre (also see Figure 8). The 90-acre Gateway Centre site was planned for approximately 199 single-family units, 396 townhouses and duplexes, and 161 apartments (1,211 d.u.s).

Project Relationship

Nonconforming. Gateway Centre represents a major change in use of the east side of the Natomas Oaks PUD, displacing roughly 1,200 units of planned housing. Approval of Natomas Eastside and Gateway Centre land use changes would create strong interest in rezoning remaining Natomas Oaks lands (west of Natomas Oaks Drive) to more intensive uses such as higher density residential and/or support commercial and office uses.

Table 8
NATOMAS OAKS PUD--PROPOSED LAND USE

| <u>Land Use</u> | <u>Offsite Portion</u> | <u>Gateway Centre Portion</u> | <u>Total</u> |
|---------------------------------|----------------------------|-----------------------------------|--------------|
| Single family units | 73 | 199 | 272 |
| Townhouses and duplexes | 878 | 396 | 1,274 |
| Multiple family units | 41 | 616 | 657 |
| Total dwelling units | 992 | 1,211 | 2,203 |
| Residential area (gross acres) | 120 | 103 | 223 |
| Neighborhood park (gross acres) | 9 | 0 | 9 |
| Parkway (gross acres) | * | * | 13 |
| Streets (gross acres) | * | * | 20 |
| Total area (gross acres) | 162 | 103 | 265 |

SOURCE: City Planning Department Development Inventory Map, South Natomas, March 1981.

* Unknown.

f. Land Use Guidelines around Natomas Airport

The Natomas Airport is located 0.5 miles north of the project sites across the I-5/I-80 interchange. The Sacramento Area Council of Governments (SACOG) has established land use guidelines based on Federal Aviation Regulations restricting building heights and maintaining approach safety zones around the facility. 8,9,10

Policies

Two building height zones are applicable to the project sites, as shown on Figure 8. The more restrictive zone, an overflight zone (OZ), extends 5,000 feet from the south end of the runway to include as many as 5 of the northernmost office building sites. Within this zone, building heights are restricted to 150 feet. The less restrictive zone, Zone I, extends 9,000 feet from the south end of the runway to include all of the Natomas Eastside site and the northern one-third of the Gateway Centre site. Building heights are restricted here to a maximum ranging from 150 feet to 350 feet.

Project Relationship

Conforming. Project building heights as currently proposed would not exceed six stories (approximately 70 feet).

g. City of Sacramento Zoning Ordinance

City general and community plan policies are implemented by regulations set forth in the Zoning Ordinance. Current zoning classifications are listed in Table 9.

Policies

As established in the CSGP, vacant lands on the urban fringe are held in the ordinance's Agriculture (A) designation until urban development proposals are approved. All of the Natomas Eastside site is zoned Agriculture (A). Upon adoption of the Natomas Oaks PUD, the Gateway Centre site was rezoned from Agriculture to a PUD overlay zone with Townhouse (R-1A) and Light Density Multiple Family (R-3) underlying zones. The zones correspond to the use designations shown on Figure 8.

Project Relationship

Changes. Effects of the proposed action to change current zoning designations are summarized in Table 9. Approval of the proposed rezoning would result in a loss of about 58 acres of townhouse, 6 acres of multi-family residential, and 160 acres of agriculture zone; and an addition of 8 acres of multi-family residential, 181 acres of office, and 42 acres of general commercial. All development proposed along I-5 as shown in Figures 3 and 4 would be subject to corridor overlay zone restrictions.

Portions of the project sites along I-5 will be subject to the provisions of the city's Interstate 5 Corridor Overlay Zone (I-5 Designation) when rezoned to urban uses. The zone was established to reduce the visual effects of urban development along the city's northern entrance, and the environmental effects of the freeway on adjacent residents.

Conflicts. The zoning ordinance limits building heights to 35 and 45 feet in O-B and C-2 zones, as shown in Table 9. Both Natomas Eastside and Gateway Centre propose building heights up to 6 stories (roughly 70 feet). A variance, subject to conditions set by the Planning Commission, would be required for any project structure exceeding the height limitations defined in the zoning ordinance.

4. MITIGATION MEASURES

a. One or a combination of the following steps should be considered to offset project displacement impacts on the South Natomas area's intended functions as a residential concentration in close proximity to the CBD.

(1) Increase allowable densities on the west-of-I-5 side of the community. For example, an increase from the current average effective density of 6.5 units/acre to roughly 7.5 units/acre (the east-of-I-5 average) would raise the west side capacity with the projects from 3,860 to 4,454 units (i.e., plus 594 units), offsetting 33 percent of the project displacement impact.*

(2) Increase allowable densities on the east-of-I-5 side of the community. For example, an increase from the current average effective density from 7.6 to 8.5 units/acre would increase the east side capacity from roughly 10,370 to 11,600, an increase of 1,230 units (an 11 percent increase).*

* Important Note. Currently, there are basic limitations on sewerage capacity in the South Natomas area. Measures (1) and (2) would require additional sewer line and sewage pump station capacity.

Even under the current SNCP development scenario, South Natomas sewage collection systems on both sides of I-5 would be strained. Any additional urban intensification, such as suggested in (1) and (2) above, would require construction of supplementary collector lines. West of the drainage canal, to accommodate measures (1) and (2), it would be necessary to construct a collector (12 to 15 inch diameter) parallel to the existing line along Orchard Lane that would connect to the existing 36 inch interceptor main beneath San Juan Road. East of I-5, it would be necessary to construct a similar line parallel to the existing one in Truxel Road.¹²

Pump station capacity to the regional wastewater treatment plant is limited. Although a new pump station is being constructed in South Natomas to transport sewage to the regional treatment plant, it would barely have sufficient capacity for SNCP development, and would not have capacity to accommodate the projects plus housing density offset measures.¹³

Table 9
CURRENT AND PROPOSED ZONING

| Zone | Designation | Land Use | Max Lot Coverage (%) | Height Limit (feet) | Current Areas (net acres) | | | Proposed Areas (net acres) | | |
|-------------------------------|-------------|--|----------------------|---------------------|---------------------------|----------------|-------|----------------------------|----------------|-------|
| | | | | | Natomas Eastside | Gateway Centre | Total | Natomas Eastside | Gateway Centre | Total |
| Townhouse | R-1A | Low density condominium type projects, incl. townhouse, cluster, and row-house units | 40 | 35 | 0 | 58 | 58 | 0 | 0 | 0 |
| Light-Density Multiple Family | R-3 | Light density res'l generally located outside central core adj. to single-family areas; can serve as buffer along major streets and shopping centers | 50 | 35 | 0 | 27 | 27 | 21 | 0 | 21 |
| Office Building | O-B | Business office centers, institutional and professional buildings | no reqmnt | 35 | 0 | 0 | 0 | 106 | 75 | 181 |
| General Commercial | C-2 | Retail sales, food and drink, personal services, repair, small wholesale stores or distributors, limited processing and packaging, motels, etc. | no reqmnt | 45 | 0 | 0 | 0 | 31 | 10 | 42 |
| Agriculture | A | Agriculture and farming, open space; holding zone for urban expansion consistent with general plan | -- | 50 | 160 | 0 | 160 | 0 | 0 | 0 |
| | | | | | 160 | 85 | 245 | 158 | 85 | 244 |

SOURCE: Wagstaff and Brady from City Planning Dept. data.

^aNatomas Oaks PUD rezoning.

A possible solution to South Natomas pump station limitations would be to expand the scope of a current design study effort to convert the existing North Natomas treatment plant to a pump station. An expanded scope-of-study could enable plans to be made to accommodate a portion of South Natomas sewage at the new North Natomas pump station, thereby eliminating pump station limitations in South Natomas.¹⁴ Study expansion could be funded by fair share developer contributions.

On the other hand, in comparing sewer impacts of such density increases with current SNCP impacts, it should be noted that recent housing density adjustments from the SNCP to reflect actual development patterns (March 1981 city staff calculations) resulted in a greater increase in sewer demand than would the suggested density increases. This indicates that sewer improvements will probably also be needed with the current SNCP.

b. Condition approval of the proposed projects on fair share contributions from applicants to cover the cost of formulating a revised set of land use policies and criteria for the west side that would be appropriate to a mixed-use residential/office center.

c. To reduce land use conflicts between future Natomas Oaks residential uses along Natomas Oaks Drive and Gateway Centre office and commercial uses, orient Natomas Oaks residential uses internally (away from the route and Gateway Centre) and require new residential development to include a landscaped buffer along the west side of Natomas Oaks Drive, similar to the proposed Gateway Centre edge.

d. To implement SNCP drainage channel parkway policies, require that the designated corridor or linear commons along the Natomas Eastside channel frontage be of sufficient width to distinguish the channel, provide for landscaping and common use by adjacent Natomas Eastside townhouses, and to provide for channel maintenance access. Condition project approval on review of specific canal corridor landscape treatments--plantings, pedestrian and bike paths, safety barriers, etc.

e. Consider the following criteria in reviewing project-related requests for height variances (also see VISUAL section of this report):

(1) Place higher structures at locations where height will achieve visual interest consistent with other nearby land use considerations;

(2) Relate project building heights to the height and character of future adjacent uses to the west;

(3) The height of buildings should taper down to the edge of the project boundaries, i.e. six-story structures should be clustered towards the center of the two projects, buffered from surrounding land uses and local roads--Natomas Oaks Drive, West El Camino Avenue, Garden Highway--by lower structures; and

(4) Avoid casting extensive shadows on other project buildings and neighboring areas.

5. REFERENCES

- ¹City of Sacramento. General Plan, August 1974.
- ²City of Sacramento. South Natomas Community Plan, February 1978.
- ³D. Parker, Memorandum, re. "Project Alternatives," Sacramento City Planning Department, April 24, 1981; and July 14, 1981 revisions.
- ⁴Ibid.
- ⁵City of Sacramento. Central City Community Plan, Adopted May 15, 1980.
- ⁶Environmental Assessment and Resource Planning, Inc. Sacramento River Parkway Master Plan, prepared for the City of Sacramento, June 1975.
- ⁷City of Sacramento, Planning Department staff report, re: "Spink Corporation application for Natomas Oaks PUD," November 21, 1979.
- ⁸South Natomas Community Plan, op.cit.
- ⁹City of Sacramento. Draft and Final Environmental Impact Reports for South Natomas Community Plan, November 1977 and February 1978.
- ¹⁰Sacramento Area Council of Governments. Natomas Airport Influence Zones, undated.
- ¹¹City of Sacramento. Zoning Ordinance, revised July 1980.
- ¹²Douglas Frederick, Sacramento County Public Works Division, personal communications with Wagstaff and Brady (W. Borges), re: sewer constraints to implementation of residential density offset mitigation measures, August 1981.
- ¹³Ibid.
- ¹⁴Ibid.

E. POPULATION, HOUSING, AND EMPLOYMENT

The effects of the proposed Natomas Eastside and Gateway Centre land use changes on population, housing, and employment trends in South Natomas, the city and region are described in this section. The three factors are discussed together since there are direct local and regional linkages between the creation of jobs, changes in population characteristics, and housing requirements.

I. EXISTING SETTING

a. Regional Population Trends

(1) Recent Past. As shown in Table 10, population in the tri-county region has grown in the last decade at an average annual rate of about 2.5 percent. Much of this growth can be attributed to an expanding economy and to urbanization branching along major freeways throughout the region, away from the historic central core area of Sacramento. Related opportunities for new housing subdivision and development have resulted in, and reinforced, a suburban development pattern.

The region has grown from 800,592 in 1970 to 996,700 in 1980, or by 24.5 percent for the ten year period.

(2) Outlook. Population growth in the region during the next decade is projected at a slower rate of growth with an annual average of about 1.6 percent. Tri-county population is expected to reach a total of 1,155,500 by 1990 and some 1,311,200 by the year 2000. Table 11 presents these figures as prepared by the State Department of Finance.

As Table 11 indicates, Sacramento and Yolo counties are expected to generate the bulk of new population to be gained in the coming decades. These additions will be a function of housing development keyed to industrial and other employment growth which are both expected to remain concentrated in the two higher growth jurisdictions.

b. Metropolitan Area Population and Housing Trends

(1) Recent Past. Sacramento County (including its incorporated areas) comprises the bulk of the regional population, and has averaged an annual rate of growth of about 2.2 percent between 1970 and 1980. For the unincorporated urban areas, the 1970 to 1980 annual population growth rate was 2.4 percent. The city of Sacramento has expanded at a much slower pace than the county, with an annual average increase of 1.4 percent over the last decade.

Table 10
LOCAL AND REGIONAL POPULATION GROWTH, 1970-1980

| | <u>Population 1970</u> | <u>Population 1980</u> | <u>Percentage Change 1970-1980</u> | <u>Annual Change 1970-1980^c</u> |
|------------------------------|----------------------------|----------------------------|--|--|
| City of Sacramento | 254,400 | 289,200 ^b | 14 | 1.4 |
| County of Sacramento | 631,500 | 770,200 | 22 | 2.2 |
| Tri-County Area ^a | 800,600 | 996,700 | 25 | 2.5 |

SOURCE: LeBlanc & Company, data from State Department of Finance--Series E-150, except for SACOG figure noted with (b) (all numbers rounded)

^aSacramento, Placer, and Yolo Counties.

^bSource: SACOG

^cCompounded annual rate of change

Table 11
COUNTY AND REGIONAL POPULATION AND HOUSEHOLD PROJECTIONS, 1980-2000

| | <u>Population 1980</u> | <u>Projected Population 1985</u> | <u>Projected Population 1990</u> | <u>Projected Population 2000</u> |
|-------------------------|----------------------------|--|--|--|
| Sacramento County | 770,200 | 853,900 | 876,700 | 975,600 |
| Placer | 116,100 | 145,200 | 150,300 | 191,600 |
| Yolo | 110,400 | 119,400 | 128,500 | 144,000 |
| Tri-County Total | 996,700 | 1,118,500 | 1,155,500 | 1,311,200 |
| Households ^a | 398,700 | 447,400 | 462,200 | 524,500 |

SOURCE: State Department of Finance, Series E-150; LeBlanc & Company (all numbers rounded)

^aBased on 2.5 persons per household, as suggested by city staff.

Of the county's unincorporated urban areas, the following seven were considered "high growth" areas during the 1970 to 1980 period:

| <u>Community</u> | <u>Annual Growth Rate (Percent)</u> |
|------------------|-------------------------------------|
| Citrus Heights | 6.0 |
| Carmichael | 2.0 |
| Fair Oaks | 3.0 |
| Rancho Cordova | 4.0 |
| South Sacramento | 2.5 |
| Elk Grove | 4.1 |
| Galt | 4.0 |

As shown, Citrus Heights and Rancho Cordova have been two of the more rapidly growing unincorporated communities since 1960. Recent development activity outside city boundaries has been highest in Fair Oaks, North Highlands, Orangevale, and Citrus Heights.

Recent city growth activity has been greatest in 5 of the 11 designated communities within the incorporated area. The 5 communities have been designated as "growth areas" by the city. The following is a list of total subdivision applications filed in 1980 for the 5 "growth areas":

| <u>Community</u> | <u>Units in 1980 Applications</u> |
|----------------------|-----------------------------------|
| South Natomas | 1,501 |
| South Sacramento | 1,833 |
| Meadowview Community | 511 |
| North Sacramento | 298 |
| Pocket Community | 776 |

(2) Outlook. Projected growth indices for Sacramento County are listed in Table 12. Overall population and household growth projections for Sacramento city proper, as reported within the city's Housing Element, are shown in Table 13.

Population and household growth projections for all metropolitan area urban communities, both city and county, are listed in Table 14.

Local. Recent projections from the city's Housing Element (1980) are shown in Table 15. They indicate a rather limited expansion of the North Sacramento and Meadowview communities (though pending development applications for the latter could add another 6,000 or more persons by 1985, that are, as yet, uncounted in official city projections).

Clearly the South Natomas area is the leader in potential for growth, with South Sacramento and the Pocket areas somewhat less so, but still significant.

Table 12
SACRAMENTO COUNTY DEMOGRAPHICS AND HOUSING UNIT PROJECTIONS
TO YEAR 2000

| | <u>1985</u> | <u>1990</u> | <u>1995</u> | <u>2000</u> |
|-------------------------|-------------|-------------|-------------|-------------|
| <u>Total Population</u> | | | | |
| County | 816,000 | 877,400 | 930,600 | 976,700 |
| Unincorp. Only | 498,600 | 540,200 | 576,200 | 607,200 |
| <u>Households</u> | | | | |
| County | 326,800 | 356,600 | 380,600 | 404,400 |
| Unincorp. Only | 188,190 | 207,120 | 221,700 | 237,200 |
| <u>Housing Units</u> | | | | |
| County | 347,700 | 379,400 | 405,000 | 430,200 |
| Unincorp. Only | 200,200 | 220,300 | 235,800 | 252,300 |
| <u>Overall County</u> | | | | |
| <u>Housing Needs</u> | 62,200 | 93,900 | 119,500 | 144,800 |

SOURCE: Sacramento Regional Area Planning Commission (SRAPC), Draft Projections--Series E-150, 8/15/78.

Table 13
CITY POPULATION AND HOUSING PROJECTIONS THROUGH 1985

| | <u>Population</u> | <u>Households</u> |
|-----------|-------------------|-------------------|
| Year 1980 | 289,200 | 114,700 |
| Year 1985 | 317,400 | 129,100 |

These projections are correlated with SRAPC projections for the regional area.

Table 14
METROPOLITAN AREA POPULATION AND HOUSING PROJECTIONS THROUGH 1985

| | <u>Total Population</u> | <u>Households</u> |
|-----------|-------------------------|-------------------|
| Year 1980 | 417,700 | 171,500 |
| Year 1985 | 441,950 | 190,000 |

SOURCE: SRAPC

Table 15.
PROJECTED POPULATION AND HOUSEHOLD CHANGE IN DESIGNATED RESIDENTIAL GROWTH AREAS, 1980-1985

| <u>Community</u> | <u>1980 HH</u> | <u>1985 HH</u> | <u>1980 Pop</u> | <u>1985 Pop</u> |
|------------------|----------------|----------------|-----------------|-----------------|
| South Natomas | 4,600 | 6,600 | 12,230 | 16,000 |
| South Sacto | 26,820 | 33,400 | 68,600 | 78,500 |
| Meadowview | 9,700 | 10,400 | 30,600 | 30,400 |
| North Sacto | 13,300 | 14,250 | 34,200 | 34,500 |
| Pocket | 8,900 | 10,600 | 23,600 | 26,900 |

SOURCE: 1980 Housing Element of the Sacramento City General Plan, June 1980.

c. Local Housing Supply Characteristics--South Natomas and North Sacramento

(1) Recent Subdivision Activity. In 1980, subdivision applications for 1,501 units were received for South Natomas. This was the second highest number of all Sacramento community planning areas. North Sacramento experienced moderate activity with applications for 298 units.

A breakdown on the types of units for which subdivision applications were submitted in South Natomas and North Sacramento follows:

| | <u>Single</u> | <u>Duplex</u> | <u>Patio</u> | <u>Condo/ Townhouse</u> | <u>Total</u> |
|---------------|---------------|---------------|--------------|-----------------------------|--------------|
| South Natomas | 355 | 282 | --- | 864 | 1501 |
| N. Sacramento | 82 | 85 | 69 | 62 | 298 |

The South Natomas community had the third highest number of single family unit subdivision applications in the city (exceeded by South Sacramento at 719 and Pocket at 358); and the highest number of duplexes and condominium/townhouses. North Sacramento had the second highest number of applications for patio homes (exceeded only by South Sacramento at 216).

(2) Vacancy Rates. The city of Sacramento's overall vacancy rate for all housing units in 1978 (most recent count) was 2.3 percent. The rental vacancy rate was 3.8 percent and the owner vacancy rate was 1.4 percent.

The 1979 survey of multiple family rental vacancy rates prepared by the Sacramento HUD office indicates that North Sacramento had the lowest rate at 1.7 percent and South Natomas ranked fifth at 4.6 percent of all Sacramento communities.

(3) Housing Types. Following is the 1979 city-county inventory of housing by type of unit for South Natomas and North Sacramento:

| | <u>Single</u> | <u>Duplex-Triplex Fourplex</u> | <u>Apt.</u> | <u>Total</u> |
|---------------|---------------|------------------------------------|-------------|--------------|
| South Natomas | 2,414 | 183 | 210 | 2,807 |
| N. Sacramento | 9,854 | 1,718 | 2,033 | 13,605 |

These 1979 figures are provided for South Natomas - North Sacramento comparison purposes. More recent figures for South Natomas, based on subdivision activity to 1981, are provided in Table 17.

(4) Housing Subsidies. The 1979 inventory of subsidized housing indicates that South Natomas had only 12 units funded through HUD Section 8--Existing Rehabilitation. North Sacramento had 1,004 units subsidized from various funding sources.

| | |
|--|-------|
| Total Units Subsidized in North Sacramento | 1,004 |
| Total Units Subsidized in South Natomas | 12 |
| Total Units Subsidized for North Sacramento and South Natomas | 1,106 |

d. Local Demand Characteristics and Trends--South Natomas and North Sacramento

(1) Projected Growth Rates. Existing agency forecasts (SACOG and city of Sacramento) indicate that the South Natomas community, which now comprises about 4 percent of the city of Sacramento's population, will increase to 9 percent by 1995. This would mean a community area population of roughly 31,900 people by 1995.*

Thus, the South Natomas area is projected to accommodate nearly one-half of the 1980-1995 population increase for the city of Sacramento by 1995. Ultimately (1980 to buildout), the area is expected to house approximately 42,600 additional (54,300 total) residents (based on current SNCP designations**).

The following is a breakdown of recent and projected average annual growth rates (percent) for the South Natomas and North Sacramento planning areas:

| | <u>1970-75</u> | <u>1975-80</u> | <u>1980-85</u> |
|------------------|----------------|----------------|----------------|
| South Natomas | 2.7 | 8.8 | 6.1 |
| North Sacramento | -1.8 | 0.2 | 0.2 |

From 1970 to 1975 South Natomas had the second highest growth rate of all Sacramento communities, exceeded only by the Pocket area (7.5 percent). North Sacramento had the lowest growth rate.

* 9 percent of 65,200 (354,400 - 289,200) = 31,900 people or 12,760 households.

** Projected SNCP buildout = 17,050 units more than existing (1981 city estimate of buildout: 21,663 minus 4,610 = 17,050); 17,050 x 2.5 = 42,625 people.

For the periods 1975-80 and 1980-85 the South Natomas community had and is projected to have the highest growth rate in Sacramento. North Sacramento had the second lowest growth rate with Meadowview being the lowest (a slight loss; no effective growth). However, approval of pending development in the south portion of the Meadowview community may add an estimated 6,500 people for an annual average growth rate of 4.1 percent for 1980-85.

The total cumulative household growth projected for South Natomas is approximately 15,100 units over current (1980) levels* and for North Sacramento, 52,500 units. South Natomas, with an estimated 1970-85 annual rate of new household formation at 8.5 percent, is the most rapidly growing area within Sacramento city. North Sacramento actually lost population in the 1970-75 period due to freeway displacement; however, it is designated for post-1985 growth.

(2) Household Income. The 1975 inventory of households by income distribution levels (see figures below) indicates that for the "lowest income" households, North Sacramento ranks fourth at 37 percent (971) of its total households; for "lower income" households North Sacramento ranks fourth at 20 percent (2,530), and South Natomas ranks sixth at 19 percent (500); for "moderate income" households South Natomas ranks third at 23 percent (600), and North Sacramento ranks ninth at 16 percent (2,000); for "middle and upper" income households South Natomas ranks seventh at 21 percent (550), and North Sacramento ranks ninth at 11 percent (1,300).

| | <u>Lowest Income</u> | <u>Lower Income</u> | <u>Moderate Income</u> | <u>Mid-Upper Income</u> |
|---------------|--------------------------|-------------------------|----------------------------|-----------------------------|
| South Natomas | 37% (971) | 19.1% (501) | 22.8% (598) | 21.1% (554) |
| N. Sacramento | 52.9% (6,568) | 20.4% (2,533) | 16.2% (2,011) | 10.5% (1,303) |

The South Natomas area contains a fair number of elderly living on fixed incomes. Census data from 1970 indicate that more than 55 percent of all renter-occupied households in South Natomas were paying more than a quarter of their incomes for rent. These are indicators of a substantial need for below-market-rate housing.

(3) Ownership. The 1980 estimates of owner-rental households by community indicate that South Natomas ranks second in percentage of owner-occupied units (82 percent); North Sacramento ranks ninth (58 percent).

(4) Cost. The median price for a 3-bedroom home in Sacramento for 1979 was \$69,000. A survey of existing housing offerings in new subdivisions advertised for sale (as of March 1980) showed the following average price spread by type of unit and location:

* 1973 to 1980 = 2330 households; 1980 to 1995 = 12,760 households; 2,760 + 2,330 = 15,090.

| <u>Quadrant^a</u> | <u>Two Bedroom</u> | <u>Three Bedroom</u> | <u>Four Bedroom</u> |
|-----------------------------|------------------------|--------------------------|-------------------------|
| Northwest | \$63,700 | \$71,000 | \$ 84,300 |
| Southwest | 71,300 | 78,600 | 91,800 |
| Southeast | 53,200 | 60,500 | 73,800 |
| Northeast | 83,600 | 90,900 | 104,180 |

^aQuadrants as defined on the Real Estate Zone Map used by the Sacramento Board of Realtors, MLS, and Sacramento Bee.

South Natomas falls in the low end of the median price range and North Sacramento ranks lowest for new housing available in the city's growth areas, as shown below:

| | |
|-------------------|----------------------|
| South Natomas: | \$51,950 to \$77,990 |
| North Sacramento: | \$43,300 to \$48,800 |

The Sacramento Board of Realtors "real-estate zone" inventory for the period of 1977-79 indicates that South Natomas and North Sacramento fall within zone 2, which had the lowest average home price (\$36,406) for 1979 and the lowest percentage of price change (23 percent) for any area in the city.

Both South Natomas and North Sacramento have lower rent prices than other Sacramento communities. In the 3-to-4-bedroom-units category, South Natomas had the lowest median price at \$175 and \$195 respectively; North Sacramento ranked third lowest with median prices of \$220 and \$250 respectively.

(5) Affordability. The average cost of a newly constructed Sacramento area home in 1980 was beyond the reach of the average income family, especially those just entering the housing market. Least-cost market-rate homes in newly developing single-family subdivisions in 1980 averaged \$45,000 for California as a whole; however, the median price was \$77,000 for Sacramento. The average sale price of used housing in Sacramento was \$74,500.

It is clear from available data that low and moderate income households in Sacramento are and will continue to encounter serious housing affordability problems, particularly with today's financing rates of over 15 percent mortgage money. The rapid increase in the rate and the widening gap between income and housing prices will exacerbate the affordability problem in the future unless appropriate measures are taken to provide a continuing supply of lower-cost units.

New housing proposed for the South Natomas community will be beyond the price range of most low- to moderate-income households in spite of the considerable demand for low-income housing in the city of Sacramento.

(6) Metropolitan Land Supply. Land is one of the most rapidly increasing cost factors for new housing. One of the primary reasons for rising costs is the decreasing supply of readily available land.

(a) County. Sacramento County planning staff estimates of vacant, suitable land for residential development in urban areas total 33,700 acres. Sufficient land appears to exist to hold all expected growth through 1990.

(b) City. In 1980, the city of Sacramento had 15.7 square miles of vacant land (16 percent of total incorporated area) designated for future residential use.

(c) Local--South Natomas and North Sacramento. As shown in Table 11, South Natomas had a total of approximately 1,651 acres, or 1,330 acres of non-constrained* land remaining available for housing development (residential land unoccupied in May 1980); North Sacramento had a total of 1,840 acres or 440 acres of non-constrained land. This vacant area totals 3,491 gross or 1,746 non-constrained acres, for these two communities.

(7) Local Capacity--South Natomas and North Sacramento. The South Natomas and North Sacramento communities are shown in Figure 6. Roughly half of the housing in North Sacramento (southeastern half) was built between 1945 and 1970.

City records indicate that some 4,710 dwelling units have been constructed to date within South Natomas. Roughly 20 percent of the area was developed prior to 1960 (approximately 2,280 housing units). Very little activity occurred between 1960 and 1977. Since 1978, the area has experienced a rapid increase in development activity, with approximately 2,330 units added between 1978 and 1981. An additional 9,580 units (1,750 single family, 580 apartments) have been approved for construction in South Natomas.

Approximately 1,651 acres of land designated for residential use remained vacant in the South Natomas community as of December 1980. The amount represents 37 percent of the total South Natomas land area and 11 percent of overall land so designated within Sacramento city limits.

The South Natomas vacant acreage within the city is estimated to yield approximately 15,408 dwelling units under current approvals and land use designations, or 23 percent of total housing development capacity for the entire Sacramento city area under present regulations.

The following is a breakdown of the remaining designated holding capacity of South Natomas (1980 and beyond), based on the adopted 1978 Community Plan (1981 estimates)

* Non-constrained land includes areas identified in the city inventory as having no significant urban service or regulatory limitations.

| | <u>Low Density Acres (9 dus or less/acre)</u> | <u>Medium & High Density Acres</u> | <u>Total Acres</u> | <u>Total Units</u> |
|----------------|---|--|------------------------|------------------------|
| City Portion | 1,197 | 454 | 1,651 | 15,408 |
| County Portion | 440 | 9 | 449 | <u>2,507</u> |
| Total | | | | 17,915 |

g. Local Population and Housing Policies

(1) Housing Development Policies. The general housing policies of the city and county of Sacramento are nearly identical. City and county general plan goals and policies address issues of housing quantity (production), housing quality (satisfaction and standards), distribution of units, and accessibility. Recommended action programs and implementation strategies vary, however, depending on available funding and existing program structures.

(2) City Policies. Relevant action programs and policies adopted by the city of Sacramento (the project jurisdiction), as stated in the 1980 Housing Element of the Sacramento General Plan (adopted June 10, 1980), include the following topics:

- Fair housing programs
- Anti-discrimination
- Condominium conversion
- Special needs group resources
- Prefabricated housing
- Housing for the disabled
- New public housing standards for the disabled
- Historic preservation programs, and
- Residential hotel policies.

Residential unit capacity in the SNCP area, based on current city policy, is shown on Table 16; housing types in approved subdivisions are listed in Table 17.

(3) Growth Management Policies. The county is currently updating its general plan (1981 planned completion). Recently, emphasis has been placed on infilling of already developed communities. These include Rancho Cordova, Carmichael and Fair Oaks.

The three primary urban "reserve" areas that have been set aside in the county plan for future additional growth are: North Highlands, with 2,100 developable acres; Vineyard with 3,800 to 6,400 and Rio Linda El Verta, with 1,800 acres. Specific density guidelines have not been drafted.

h. Labor Market Conditions

(1) Recent Unemployment Rates. Sacramento SMSA unemployment rates have typically been higher than national figures. For example, in 1975 the U.S. and Sacramento rates were 8.5 and 9.6 percent respectively; 6.0 and 7.6 in 1978; and 7.2 and 7.9 percent in 1980.

Unemployed by Group. In the Sacramento labor market areas, construction labor appears to have the highest overall unemployment rate; this category represents nearly 30 percent of all unemployed.

Other high unemployment groups in the Sacramento labor market area include: clerical at 13 percent; managerial and professional at 8 percent; processing at 13 percent; and service employment at 7 percent. Unemployment, as is typical in California, is heavily concentrated within the younger age groups.

(3) Unemployment by Location. 1980 unemployment totals within the tri-county region were as follows for all occupations:

| | |
|-------------------|--------|
| Sacramento SMSA | 49,400 |
| Sacramento County | 35,200 |
| Yolo County | 7,400 |
| Placer County | 6,800 |

Unemployment within labor submarket areas in the region varies considerably. The figures on Table 18 illustrate unemployment rate relationships to identified residential zones. As can be seen, most of the high unemployment areas are in the project vicinity: North Sacramento, CBD, and South Natomas-Northgate.

(4) Need for Diversification of Employment Base. As described in the ECONOMIC section of this report, the Sacramento area economy has been particularly dependent upon government employment as the "basic" or growth-inducing sector. Over one-third of the region's employment is in government (as compared with 20 percent, statewide).

Recent reductions in rates of local, state, and federal job growth suggest future worsening of the SMSA unemployment rate, and indicate a significant need for increased diversification of the area's employment base.

Table 16
SOUTH NATOMAS COMMUNITY RESIDENTIAL UNIT CAPACITY--CURRENT TRENDS

| | <u>Units</u> | <u>Acres</u> | <u>Average Densities</u> |
|-------------------------------|---------------|--------------|------------------------------|
| Existing Units | | | |
| 1973 total | 2,280 | 450 | 5.1 |
| Units constructed, 1973-1980 | 2,330 | 300 | 7.8 |
| Total | <u>4,610</u> | <u>750</u> | <u>6.1</u> |
| Remaining Capacity | | | |
| Approved subdivisions | 9,590 | 1,250 | 7.7 |
| Planned areas | 7,480 | 940 | 7.9 |
| | <u>17,070</u> | <u>2,190</u> | <u>7.8</u> |
| TOTAL UNITS WITH CURRENT SNCP | 21,680 | 2,940 | 7.4 |

SOURCE: City Planning Department, December 1980 roof counts and March 1981 inventories. All figures rounded; acreages estimated by Wagstaff and Brady based upon city's South Natomas community development inventories, March 1981.

City Staff Note: The South Natomas Community Plan, adopted February 1978, projected an estimated 27,745 residential dwelling units based on 2,949 residential designated acres. City planning staff, after conducting a residential vacant land inventory in March 1981, revised the residential capacity to 21,680 units for city and county portions of South Natomas. The difference reflects the fact that some projects with lower densities were approved prior to the adoption of the community plan, the vacant land inventory used current building densities, and the original base map was improperly reproduced.

Table 17
HOUSING TYPE BREAKDOWN--APPROVED SUBDIVISIONS FOR THE SOUTH NATOMAS AREA, MARCH 1981

| | <u>Units</u> | <u>% of Households (HH)</u> |
|------------------------|--------------|-----------------------------|
| Dwelling Units by Type | | |
| Single family | 3,980 | 33 |
| Duplex | 1,220 | 9 |
| Halfplex | 820 | 7 |
| Multifamily | 3,110 | 27 |
| Condominium | 1,310 | 11 |
| Townhouse | <u>1,460</u> | <u>12</u> |
| TOTAL | 11,910 | 100 |

SOURCE: City Planning Department inventories, March 1981; all figures rounded.

Table 18
DISTRIBUTION OF UNEMPLOYED IN METROPOLITAN SACRAMENTO, 1980

| Labor Market Areas | Unemployed Labor Force Labor Market Areas | |
|-------------------------------------|---|--------|
| | Percent | Number |
| Metropolitan Area (Sacto SMSA) | 10.5 | 49,400 |
| South Natomas, Northgate-Gardenland | 14.9 | 1,074 |
| North Sacramento (Del Paso Heights) | 17.4 | 2,671 |
| CBD (Washington Area) | 15.4 | 1,254 |
| Southside | 12.0 | 1,258 |
| South Sacramento (Oak Park) | 15.1 | 1,217 |
| Balance of County: | | |
| Orangeville/Folsom | 11.4 | 2,881 |
| Rio Linda-Natomas | 13.7 | 1,023 |
| Rancho Cordova | 11.7 | 1,829 |
| Tri-County Region | | |
| Sacramento County | 9.5 | 35,200 |
| Yolo County | 13.3 | 7,400 |
| Placer County | 11.9 | 6,800 |
| Total, Tri-County | 10.3 | 49,400 |

SOURCE: EDD Report 400L Northern Supplement, January 1981.

2. IMPACTS

a. Direct Employment Effects

Job Types. Present plans submitted by the two project applicants call for location of a very significant number of office-based and other commercial and service jobs within the project site. From information provided by the applicants and the city, the following employment profile could be expected for the two combined development projects:

| <u>Employment Category</u> | <u>Gateway Centre</u> | <u>Natomas Eastside</u> | <u>Total</u> |
|--------------------------------|---------------------------|-----------------------------|--------------|
| Office-Based (Professional) | 1,700 | 2,600 | 4,300 |
| Office-Based (All Others) | 4,000 | 5,500 | 9,500 |
| Commercial & Services | <u>500</u> | <u>1,500</u> | <u>2,000</u> |
| Totals | 6,200 | 9,600 | 15,800 |

According to an employment study commissioned by the Gateway Centre developers and completed by the Business Services Bureau of California State University, Sacramento, the most likely firms to locate in the project as planned include those involved in: computer programming and data processing; research, administrative, and clerical processing; professional and business services; and the like. The study also estimates that roughly 70 percent of all employees in Natomas Eastside and Gateway Centre will be of "non-professional" level skills. A similar profile could be expected for Natomas Eastside.

b. Indirect Employment Effects

(1) Job Types. Indirect or secondary employment impacts would result from two project factors: (a) the income circulation from direct employment--jobs created as each dollar from the directly employed wage earner is cycled through the regional economy; and (b) jobs created by the development of secondary business activity in support of the project. These secondary employment impacts would include job opportunities in services, professions, retailing, and similar occupations.

(2) Total and Secondary Effects. The degree of total employment impact from direct and secondary employment typically ranges from 1.5 to 2.0 times direct jobs created. Thus the total (direct and secondary) employment impact of the project could range from 23,700 to 31,600 jobs. Of this total, 15,800 jobs have been estimated to be direct jobs associated with the two business park proposals (see 2.a., above); leaving 7,900 to 15,800 as secondary.

c. Effects on Labor Market Conditions

The projects are expected to have a significant and positive effect on labor market area conditions for the reasons discussed below.

(1) Unemployment Rate by Group. Projected direct and indirect employment effects could have a significantly positive impact on the labor market area unemployment rate. More specifically, many of the positions created by the projects would have skill requirements which generally match recent unemployment data by grouping as suggested by:

- 1981 State EDD data indicates that 13 percent of the total 1980 SMSA unemployed, or 6,400 people, had backgrounds in clerical and related categories ("non-professional").* The two projects are expected to directly provide roughly 9,500 office-based non-professional jobs.
- Similarly, state data indicates that about 8 percent of the unemployed total, or around 3,600 jobs, were in the managerial and professional categories. Predicted direct project employment includes 4,300 office-based professional jobs.
- State data suggests that approximately 11 percent or 5,500 of the SMSA unemployed were in commercial categories (sales and service jobs). The projects are expected to directly provide some 2,000 commercial and service jobs.

The above comparisons do not include the potential additional effects of the 8,000 to 16,000 secondary jobs generated by the project in professional, service and retailing occupations.

In conclusion, recent state data indicate that many project-generated jobs could be filled by persons from the area's high unemployment categories with only moderate training.*

(2) Unemployment by Location. State EDD data described above indicates that the projects would directly provide a significant number of jobs in a location near several concentrations of SMSA unemployment (see Table 11 and Figure 5).

(3) Need for Job Diversification. The projects would provide a significant opportunity for needed diversification of the area's employment base, since they could reduce the area's relatively high level of dependence on government employment.

d. Construction Employment Effects

Development of the two business park proposals would generate a significant amount of construction employment, based on the calculations below.

(1) Direct Effects: Construction Value Translation. It is estimated that the construction valuation of the two development proposals is roughly \$275 million. The estimate is based on construction of 3.7 million square feet of office and commercial space and 468 dwelling units.

Assuming that 60 percent of this construction value represents construction wages paid, approximately \$165 million in labor would be supported in total. Using an average construction industry salary of \$25,000, this produces some 5,750 man-years of construction industry employment during the construction phases of the combined office and commercial projects.

This volume of construction activity would account for perhaps 10 percent of the regional 41,000-person construction work force projected by the State of California for Sacramento-Yolo-Placer counties by 1985.

* Business Services Bureau, California State University, Sacramento, 1981

(2) Secondary Impacts. The following additional private employment impacts would relate to the size and duration of this construction activity:

- an unknown amount of additional construction-related employment would be generated from time to time for public works projects required to serve the development; and
- additional employment tied to the income changes of construction workers would be experienced (primarily affecting the retailing and service sectors).

(3) Effect on Construction Unemployment. Employment generation from the two projects will significantly improve construction employment in the region, and lessen unemployment in the construction trades, should the slump in residential work continue through the decade.

(4) Net Construction Employment Impact. The "displaced" residential construction that would occur as a result of the proposed reduction in SNCP residential use designations would result in some reduction in the overall beneficial construction employment impact of the proposed projects, as shown in Table 19.

Using the highest direct residential unit loss, which would be roughly 1,800 units assuming both Gateway Centre and the Natomas Eastside projects are both developed, the unrealized construction employment would be based on approximately \$90 million worth of "hard construction" (at \$50,000/unit). Using the same \$25,000 man-year measure used above, 2,150 person-years of construction labor would be involved. This produces the "net" direct construction employment impact of some 3,600 person-years in "maximum effect" terms, as shown in Table 19.

The worst case net construction impact of 3,600 person-years does not take into account the likelihood that much of the lost onsite residential construction activity would probably shift to other locations within the same labor market area, raising the overall construction impact back towards 5,000 person-years.

Table 19
MAXIMUM NET CONSTRUCTION IMPACT FROM SOUTH NATOMAS GENERAL
PLAN REVISIONS

| | |
|---|---------------------------|
| Construction generated by the two business parks | 5,750 person-years |
| Less construction generated by SNCP residential land use | <u>2,150</u> person-years |
| Net Construction Impact | 3,600 person-years |

SOURCE: LeBlanc and Company

NOTE: The difference is due primarily to the increased labor intensity associated with commercial development.

e. Residential Distribution of Direct Employment

The settlement distribution of project workers would be largely determined by the relationship of worker household characteristics to the location and other characteristics of residential growth areas, as described earlier in this section.

(1) Worker Considerations. The following considerations would affect the residential location choice of workers who might take employment with South Natomas firms:

- their existing residential situation, if already located in a regional community;
- their income level and other household characteristics;
- commute distance and cost considerations;
- residential characteristics of the South Natomas community itself (unit types available or to be offered, price, features, local schools, access to other areas, etc.); and
- whether the job seeker is a primary or secondary wage earner.

(2) Regional Growth Considerations. It is estimated that 85 to 90 percent of the total metropolitan area population lives presently within "reasonable" time and cost distance of South Natomas. This commute range would include Davis and Woodland to the west, and Lincoln and Rocklin to the east.

Employment prospects which are now developing in the Roseville area point to a possible division of the metropolitan area's northern segments into at least two zones: one where workers are more likely to choose jobs in the Roseville direction, and one where workers might select the South Natomas direction. For purposes of this analysis, the line of demarcation between these two zones is assumed to lie roughly along Watt Avenue.

(3) Anticipated Growth Areas. New residential development is anticipated in many areas of Sacramento city and county. Buildout of vacant land designated as "residential" in current general and community plans is estimated in Table 20. Of the 158,000 additional dwelling units permitted in the county under current policies, perhaps 58,000 would lie within Sacramento city limits.

(4) South Natomas and North Sacramento Attraction. The business park proposals would enhance the residential desirability of the South Natomas and North Sacramento areas due to their proximity to a major new employment center.

The two communities would probably become more attractive to middle and upper income residents who would be willing and able to pay higher prices for housing and upgrade existing housing conditions.

Table 20
HOUSING UNIT GROWTH PERMITTED (UNBUILT) BY PRESENT PLANNING
DESIGNATIONS

| <u>Area</u> | <u>Number of Units</u> | <u>Population (@ 2.5 per hhld)</u> |
|-----------------------|------------------------|------------------------------------|
| South Natomas | | |
| City | 15,400 | 38,500 |
| County | 2,500 | 6,250 |
| North Sacramento | 13,100 | 32,750 |
| Pocket-Meadowview | 18,200 | 45,500 |
| South Sacramento | 14,300 | 35,750 |
| Other | <u>5,300</u> | <u>13,250</u> |
| City Subtotal | 68,800 | 172,000 |
| County Unincorporated | | |
| Subtotal | <u>100,000</u> | <u>250,000</u> |
| TOTAL | 168,800 | 422,000 |

SOURCE: Sacramento County Planning Department

(5) Affordability. The depletion of the 203 acres of planned residential land and increased attractiveness of remaining lands due to the projects could result in greater pressure on the price and affordability of housing in the area. If housing in South Natomas is developed at prices in line with recent trends, it is likely that many of those employed in the two business parks would choose a home there, to minimize commute distance.

Certainly the character of the South Natomas area is favorable when compared to other emerging residential locations. The community could be quite attractive to the dual-income household, where one wage earner takes a job in the central Sacramento zone (government or other white collar), and the second wage earner a job in a South Natomas position.

(6) Distribution Conclusions -- Direct Employment. Based on the above and related considerations, the residential distribution of permanent direct employment from the two business parks is projected as shown in Table 21.

As Table 21 indicates, 30 percent of professional workers in the office parks could be expected to live in South Natomas, while the proportion for non-professional workers would be slightly lower at 20 percent, the difference related to the cost of new housing.

Table 21
RESIDENTIAL DISTRIBUTION OF DIRECT EMPLOYMENT HOUSEHOLDS

| Residential Area | Job Type | | Others | | Total | |
|------------------|-------------------|--------|--------|--------|-------|--------|
| | Professional % | Number | % | Number | % | Number |
| South Natomas | 30 | 1,290 | 20 | 2,300 | 23 | 3,590 |
| N. Sacramento | 10 | 430 | 20 | 2,300 | 17 | 2,730 |
| Other Sacto City | 20 | 860 | 25 | 2,875 | 24 | 3,735 |
| Sacto County | 25 | 1,075 | 15 | 1,725 | 18 | 2,800 |
| Placer County | 10 | 430 | 15 | 1,725 | 14 | 2,155 |
| Yolo County | 5 | 215 | 5 | 575 | 5 | 790 |
| Totals: | 100 | 4,300 | 100 | 11,500 | 100 | 15,800 |

SOURCE: LeBlanc & Company, Wagstaff and Brady

The remainder would be spread throughout the area, with the greatest concentrations in the North Sacramento and South Sacramento growth areas, and in unincorporated communities to the east.

f. Residential Distribution of Added Indirect Jobs

Although estimating the distribution of secondary employment households would be highly speculative, it can be assumed that much of the 7,900 to 15,800 secondary jobs generated by the project would be geared to servicing regional population needs, and thus related households would settle in patterns roughly proportional with existing and anticipated residential growth locations.

Households related to secondary jobs developed nearby in support of project office and commercial activity would tend to locate in closer project proximity. This tendency would apply in particular to new secondary wage earners entering the job market, i.e. women seeking nearby service type positions.

Further complicating the matter is the unknown factor of how many of these secondary jobs will be filled by new job-holders and how many would be taken by people shifting from one job to another. For this analysis, it has been assumed that the secondary employment will be distributed proportionally to direct employment.

g. Housing Demands Generated by Project Residential Displacement

As described herein under LAND USE, development of the proposed projects would result in a net reduction of onsite residential production levels of 1,787 units. Table 22 shows a comparison of the adopted 1978 South Natomas Community Plan numbers with the proposed land use changes under review.

Table 22
RESIDENTIAL AND POPULATION DISPLACEMENT EFFECTS

| | <u>Remaining Housing Unit Capacity in Planning Area</u> | <u>Population</u> |
|---|---|-------------------|
| 1978 South Natomas Plan (city and county) | 17,906 | 44,750 |
| Plan w/Natomas Eastside Changes Only | 16,477 (-576) | 41,193 (-3.4%) |
| Plan w/Gateway Center Changes Only | 15,842 (-1211) | 39,605 (-7.1%) |
| Plan w/Both Project Changes | 15,266 (-1787) | 38,165 (-10.5%) |

SOURCE: Wagstaff and Brady from March 1981 city inventories.

(I) Potential Range of Displacement Impact. A reduction in residential development potential by 1,800 units due to the proposed changes in land use could result in the following range of displacement impact:

- **Total Loss Impact.** No construction of the units at any location. Though unlikely, this impact could occur if builders of certain types of units could not find substitute sites (such an impact is usually associated with luxury units). Under this scenario, the displaced units would not be developed elsewhere and the regional housing stock would, absolutely, lose the units.
- **Partial Loss Impact.** A combination of the preceeding and following cases.
- **No Loss Impact.** Only the location of the units would change, with construction of all of the units in one or more other sites at similar or higher densities. Shifts in builder interest from location to location are, of course, very common, and one of the major forces behind urban sprawl.

(a) **Significance of Impact.** The city's May 1980 Vacant Land Survey of residential development potentials in "growth" and "infill" areas of Sacramento revealed the following:

- Growth areas include South Natomas, Pocket-Meadowview, North of I-880/ North Sacramento, and South Sacramento. These growth areas represent a non-constrained development potential of 37,189 dwelling units.
- Infill areas include the East Sacramento, Arden-Arcade, Land Park, Central City, East Broadway, and South of I-880/North Sacramento areas. Infill areas represent a non-constrained development potential of 5,886 units.

Using these development potentials as baseline figures, it can be seen that the potential worst case housing demand increase resulting from project-related displacement ranges from 5 percent to less than 1 percent of the existing development potentials in growth and infill areas.

(b) Accommodating the Displacement Impact. Given typical uncertainties associated with regional demographic change and housing demand, it is likely that the entire dwelling unit change related to displacement could be easily accommodated via:

- Selectively increasing the density of other South Natomas residential parcels;
- Transfer of the 1,780 units to other growth or infill communities; or
- Some combination of these two measures.

The extent to which housing units displaced by the proposed office parks would be built elsewhere depends on infrastructure constraints, governmental and public actions, and private developer responses. It would be possible to accommodate all displaced units within the South Natomas residential zones remaining to be built by increasing the average density from 7.6 (current policy) to 8.3 units per acre,* an increase of less than 10 percent.

It should be noted, however, that a density increase on remaining South Natomas parcels would contribute cumulatively to the traffic and sewer impacts of the proposed business parks. The sewer improvement needs associated with such a density increase are described in the report under LAND USE, Mitigation Measure #1.

(c) Displacement Conclusion. Assuming community resistance to a 10 percent increase in density, not more than 1,000 to 1,500 of the displaced units might be accommodated within South Natomas (amounting to density increases to 7.9 and 8.1 units per acre, respectively). However, the feasibility of even this number may be limited by the aforementioned South Natomas sewer constraints. Thus it is likely that from 350 to all 1,800 of the displaced units (assuming construction of both projects) would then be accommodated as infill within land allocated for new housing elsewhere in the metropolitan area.

Given the apparent availability of sufficient buildable land apart from South Natomas within the metropolitan area, the addition of up to 1,800 units from the project site should not have a significant adverse impact on the regional supply of housing.

h. Accommodation of Housing Demands in South Natomas Specifically

Based on approximate distribution predictions developed in this analysis, the portion of the ultimate South Natomas community housing stock likely to be absorbed by project-generated housing demands would include:

- Households associated with project-generated jobs: approximately 3,600 (Table 21);

* Estimated remaining residential acreage in 1980 = 2,250 (gross). Density for planned 17,053 unit capacity = 7.6 per acre. With project, remaining acreage would be 2,250 minus 202 = 2,048; density would be 8.3 units per acre.

- Households associated with project displacement effects: 0 to 1,500, dependent on the feasibility of associated sewer improvement needs; and
- Total project-related demand for South Natomas units offsite thus would be somewhere between 3,600 and 5,100 dwelling units, or from 22 to 34 percent of the remaining planning area residential development.

This level of project-related community demands would be satisfied to some degree by normal turnover of the existing South Natomas housing stock as well as by absorption of new housing constructed in the community.

Cost. Increased demand for South Natomas housing by workers employed there would result in some price pressure. Past trends indicate that housing prices in South Natomas have increased at a rate below the regional average. The scale of project-related increases in community housing demands predicted herein would probably result in local prices increasing at or slightly above the regional market average.

i. Employment, Population, and Household Growth Inducement Effects

(1) Employment Effects. The 15,900 direct jobs on-site would represent approximately 8 to 9 percent of the 180,000 to 200,000 anticipated new jobs in the metropolitan area between 1980 and 2000. Given an expected project build-out period of from 7 to 10 years, this growth would represent 16 to 28 percent of total metropolitan area job growth during the development period.

(2) Net Additional Jobs. Attracting such a proportion of total regional job growth, and especially office type jobs, would probably require attracting some new or unprojected growth to Sacramento, (i.e., overall job growth beyond levels assumed when the 180,000 to 200,000 metropolitan 1980-2000 growth total was estimated). Also, based on the magnitude and land use concept proposed by the applicants, the existence of the project should result in some employers locating in the city of Sacramento that would not have in the absence of the project. Thus, it is assumed that 30 to 45 percent of the project-generated direct and secondary jobs (a high or "worst-case" estimate based on general experience with job growth in similar California situations) would be "additional jobs" for the labor market area, above and beyond the current estimates. The remainder would be jobs that would occur elsewhere in the metropolitan area without the project. Based on the assumption, Table 23 shows estimated net additional jobs, households and population generated by the projects.

(3) Population and Household Effects of Net Additional Jobs. Table 23 illustrates the possible effects of "net additional jobs" in terms of secondary employment, household, and population growth. Using factors of 1.5 to 2.0 secondary jobs per "net additional job," and 1.4 workers per household, the additional jobs could result in the growth inducement effects listed in the table.

Table 23

NET ADDITIONAL EMPLOYMENT, HOUSEHOLD AND POPULATION GROWTH
RESULTING FROM PROPOSED PROJECT*

| | Low (30%) | High (45%) |
|--|--------------|---------------|
| From new direct project jobs | 4,700 | 6,300 |
| From total direct and indirect (secondary) jobs (1.5 to 2.0 multiplier) | 7,100 | 12,600 |
| Net additional households (1.4 jobs/household**) | 5,000 | 9,000 |
| Net additional population (2.5 persons/household) | 12,600 | 22,600 |
| Percent increase in SMSA population projection for the year 2000 (1.3 million) | 1.0 | 1.7 |

* Growth not anticipated in current plans

** Accounts for secondary wage earners

(4) Additional Housing Demands Generated by Project. The total project-associated employment of 24,000 to 32,000 jobs would not translate directly into added regional housing demands. The majority of the primary and secondary jobs related to the projects' represent a portion of anticipated household growth, not new growth. The figures in Table 23 suggest that the project would generate a need for 5,000 to 9,000 additional housing units, beyond demands currently planned for in the metropolitan area, or between a 4 and 7 percent increase over the level of new unit development anticipated between 1980 and the year 2000 (125,800 units without the projects based on Table 11). Such growth could be accommodated either by increases in overall densities, development of from 600 to 1,600 additional acres of residential land with no density increase, or some combination of both.

j. Relationship of Project Effects to Current Housing Policies

Because it would be possible to largely offset the displacement of housing by a slight increase in overall offsite residential densities, perhaps in the South Natomas (depending upon sewer improvement needs) and North Sacramento communities (not constrained by sewer capacity since a new pump station is planned¹), the proposed office developments should not have large-scale adverse effects on the availability of "close-in" housing. The project would tend to increase the price of this housing, however.

The projects, on the other hand, would present a unique opportunity for locating housing and employment opportunities adjacent to each other.

4. MITIGATION MEASURES

a. Offsetting Housing Displacement Impacts. The projects would result in the displacement of approximately 1,800 units. The following measures should be considered by the city to offset the loss:

(1) South Natomas Area Density Increases. Remaining, uncommitted residential lands in the South Natomas community might accommodate some or all of the displaced units with minor shifts in overall density. As shown in Table 16 the remaining 2,190 acres of gross residential area has a 17,070-unit capacity under current effective densities (7.8 units/average acre). Capacity to accommodate additional units would be limited to an extent by sewer and traffic impacts.

A comparison of alternative degrees of density increase and their effects in mitigating project displacement effects follows:

| | <u>Average Density</u> | <u>Number of Added Units</u> |
|--------------------------------------|----------------------------|----------------------------------|
| Now in Effect (1978 SNCP) | 7.8/acre | -- |
| Increase Level 1: Partial Mitigation | 8.0/acre | 600 |
| Increase Level 2: Partial Mitigation | 8.3/acre | 1,200 |
| Increase Level 3: Full Mitigation | 8.6/acre | 1,800 |

Again, however, the feasibility of mitigating the sewer capacity and added traffic impacts of these density increases will determine their acceptability.

(2) South Natomas/North Sacramento Density Increases. Increasing allowable densities on both the South Natomas and North Sacramento plan community planning areas would require less overall increase to achieve the same level of offset. The North Sacramento community will not be constrained by future-sewer capacity.

(3) Conversion of Additional Agricultural Lands in North Natomas to Residential Use. The following levels of mitigation could be achieved through land conversion, assuming an average residential density of from 7 to 8 units/acre.

| <u>Level of Mitigation</u> | <u>Acres Converted</u> | <u>Number of Added Units</u> |
|--------------------------------|----------------------------|----------------------------------|
| Conversion level 1 | 80 | 560 to 640 |
| Conversion level 2 | 160 | 1120 to 1280 |
| Conversion level 3 | 240 | 1680 to 1920 |

(4) Some combination of mitigation measures (1), (2), and (3), above.

b. Housing Affordability Impacts. The following measures should be considered by the city to offset general problems of housing affordability in the South Natomas

and North Sacramento areas which would be exacerbated by project-related displacement and job generation.

- (1) Mitigate displacement affects and related cost pressures through measures described under (a) above.
- (2) Mitigate impacts on below market-rate housing demands through measures described under (c) below.
- (3) Offset high monthly housing costs through a voluntary or mandatory community-specific or city-wide energy conservation effort, utilizing architectural, site and landscape design measures which reduce summer cooling and winter heating demands.

c. Meeting Below Market Rate Housing Demands. The following efforts should be considered by the city in response to significant existing demands, which would increase with construction of the project, for low and moderate income housing, particularly in the South Natomas and North Sacramento areas:

- (1) Implement Housing Element. Further efforts should be made to implement the city's 1980 Housing Element, General Policies 4 through 8 and 12 (pp. 77-78) and Action Program proposals 5, 11, 20, 22, and 25 through 29 (pp. 78-82).
- (2) Establish Density Bonuses. City allowances could be made for project-specific density bonuses in return for providing a percentage of units for sale to below-market-rate home buyers at or near "cost" (unit construction cost plus financing). The increased density could result in essentially "extra units" with free land, reduced site preparation and marketing costs, and reduced need for profit.

Under current SNCP policies, the overall density per gross acre is relatively low (7.8), indicating opportunities for density bonuses. If a density bonus of 13 percent is permitted, for example, and 10 percent of the total number of units are price at cost (unit construction cost plus financing costs; without land, site improvement, or marketing costs, and no profit) it would be possible to reduce prices for the extra units by approximately 35 percent.²

- (3) Revise the local zoning ordinance to include "inclusionary zoning" provisions which would require that all new major residential projects (over ten units or so) sell some percentage of the dwelling units at total below-market-rate prices.

5. REFERENCES

¹ Douglas Frederick, Sacramento County Public Works Division. Personal communication, re: sewer constraints to implementation of residential density offset mitigation measures, by W. Borges, August 1981.

² County of San Mateo, Division of Housing and Community Development, Affordable Housing--A Comprehensive Strategy for Meeting San Mateo County's Housing Needs, p. 5, June 1979.

F. TRAFFIC AND CIRCULATION

I. EXISTING SETTING

A general description of the physical and operational characteristics of the existing roadway network and planned roadway improvements in the vicinity of the projects is provided below. In addition, anticipated traffic conditions associated with full development under current SNCP policies are estimated and evaluated as a base case against which to compare impacts of the requested plan amendments.

a. Existing Road System

(1) Regional Access. The South Natomas area is served by an existing freeway system--both Interstate 5 and Interstate 880 provide regional access to the area. Interstate-5 is an 8-lane facility through the South Natomas area (4 lanes in each direction), and I-880 is a 6-lane facility on the northern edge of the area (3 lanes in each direction).

(2) Local Street System. The local street system is diagrammed in Figure 11. Routes available to local traffic are West El Camino Avenue, Garden Highway, and Orchard Lane. Garden Highway and West El Camino Avenue provide for east-west movement through the community as well as for access to I-5 and/or I-880. Orchard Lane serves as a connector between West El Camino Avenue and Garden Highway, and allows for north-south traffic movements within the study area. A new 4-lane north/south collector, Natomas Oaks Drive, has recently been completed, connecting Garden Highway and West El Camino Avenue between the Natomas Main Drainage Canal and I-5. Garden Highway, West El Camino Avenue, and Orchard Lane are each currently 2-lanes wide.

b. Planned Roadway Improvements

(1) Base Case Assumptions. As stated in the SNCP EIR, certain minimum improvements to some of the existing roadways will be required prior to any future development within the project area. For purposes of this analysis it is assumed that the following plan-designated improvements will be completed before project operation:

- West El Camino Avenue will be a 4-vehicle/2-bike lane divided facility with additional turn pockets at the major intersections (120 ft. total right-of-way);
- Garden Highway will be a 4-vehicle-lane facility with turn pockets at major intersections (74 ft. right-of-way); and
- Orchard Lane will remain as a 2-lane facility, but with refuge provided for turning vehicles at the intersection with West El Camino Avenue.

Assumed intersection geometrics and minimum land configurations for these improvements are shown on Figure 11.

4L Existing number of lanes
 (6L) Assumed base case conditions

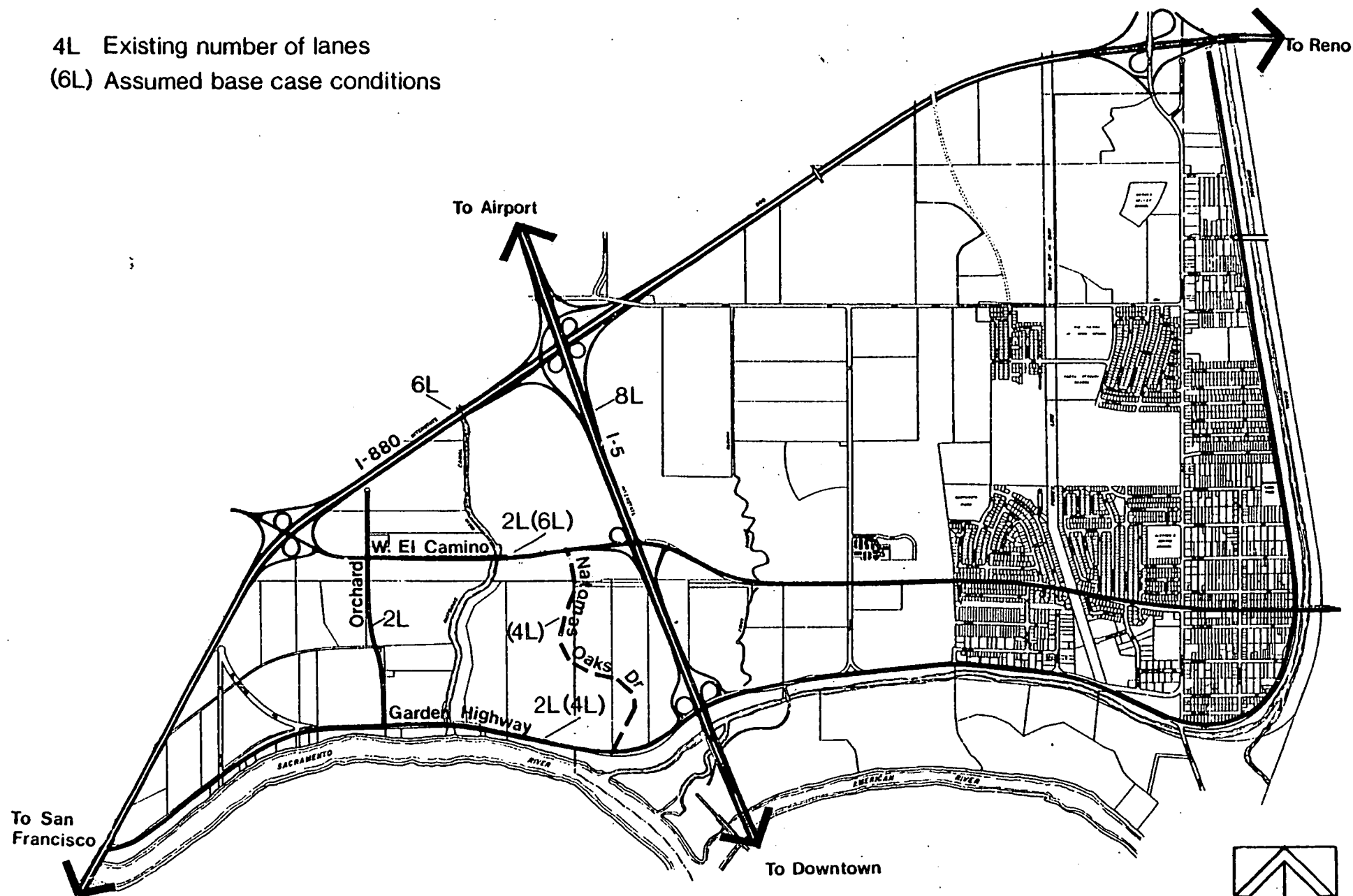


FIGURE 11
 BASE CASE ASSUMPTIONS
 EXISTING ROADWAY SYSTEM

c. Transit Service

(1) Existing Local-Serving Routes. The Sacramento Regional Transit District (SRTD) presently serves the South Natomas area through Route No. 14, which follows West El Camino Avenue between Northgate Boulevard and I-5; and I-5 between West El Camino and downtown Sacramento.

(2) Extent of Current Service. Buses on Route No. 14 operate at 30-minute headways during the morning and afternoon peak hours, and at 60-minute headways at all other hours of the day.

(3) Future Transit Use Assumptions. It has been assumed in this analysis that the ability to provide transit service will improve in future years, and that at least 6 percent of all trips generated by development in the community in 1990 would be by transit.¹ The 6 percent future transit use assumption has been used throughout this analysis.

Although SRTD service to the South Natomas area may be discontinued soon due to low ridership and loss of funding,² the effect of short-term zero percent transit service has not been considered in this traffic impact analysis since current ridership and funding problems are not applicable to future planning for 1990 and beyond. In fact, the assumption of 6 percent transit service is considered by SRTD staff to be "very conservative"² for long-range planning purposes, and suitable for this "worst-case" traffic impact analysis.³

d. Base Case Traffic Conditions

(1) Projected Plan Effects. Buildout based on policies set forth in the current SNCP will result in a significant increase in local traffic volumes over 1980 conditions, with an attendant decrease in "levels-of-service" at several critical nearby intersections. Estimated trip-generation characteristics of SNCP policy are shown in Table 27. An explanation of the level-of-service concept is provided in Table 26.*

Estimated trip generation characteristics of current SNCP policy are shown in Table 24, below.

* The methodology employed in this traffic analysis to determine levels-of-service impacts is described herein in Appendix A.

Table 24
SOUTH NATOMAS COMMUNITY PLAN AREA TRIP GENERATION AT BUILDOUT

| <u>Land Use</u> | <u>ADT</u> |
|--|---------------|
| Residential | |
| Low density | |
| 9 dus or less/acre | 90,000 |
| Medium density | |
| 11-23 dus/ac | <u>77,000</u> |
| Total | 167,000 |
| Commercial--neighborhood and community | 181,000 |
| Offices | 58,000 |
| Highway and strip commercial | 90,000 |
| Industrial | <u>7,000</u> |
| TOTALS | 503,000 |

SOURCE: CH2M HILL, Wagstaff and Brady. Approximations based upon South Natomas Community Plan Land Use Map; acreage figures in the SNCP, p. 16; 1981 city staff estimates of development intensity; and Caltrans trip generation rates by land use. The chart assumes no reduction for transit use.

Estimated morning and evening peak hour SNCP build-out traffic volumes are shown in Figures 12 and 13. These figures also show the directional flow patterns which are generally oriented away from the project area during morning peak hour and toward the area during evening peak hour.

(2) Critical Intersections. A total of 6 critical intersections can be identified within the project area where the most severe traffic problems are likely to occur. They are:

- Natomas Oaks Drive at West El Camino Avenue
- I-5 Northbound Off-ramp at West El Camino Avenue
- Natomas Oaks Drive at Garden Highway
- Orchard Lane at West El Camino Avenue
- I-5 Northbound Off-ramp at Garden Highway
- I-5 Southbound Off-ramp at Garden Highway

Table 25 shows that even with the intersection improvements noted earlier, a level-of-service of "D" or worse will occur at the intersection of the I-5 southbound off-ramp and Garden Highway. The city of Sacramento in its review of new roadway designs requires an acceptable level of service (LOS) of "C."

Table 25
1978 SOUTH NATOMAS COMMUNITY PLAN BUILDOUT^a PEAK HOUR LEVELS
OF SERVICE AT CRITICAL INTERSECTIONS

| Intersection | Peak Hour Levels-of-Service ^b (percent of design capacity) | |
|--|--|---------|
| | A.M. | P.M. |
| Natomas Oaks Drive/West El Camino | B (62%) | D (77%) |
| I-5 Northbound Off-ramp/ West El Camino | A (43%) | B (59%) |
| Natomas Oaks Drive/Garden Highway | A (43%) | A (51%) |
| Orchard/West El Camino | A (46%) | A (52%) |
| I-5 Northbound Off-ramp/ Garden Highway | A (41%) | B (56%) |
| I-5 Southbound Off-ramp/ Garden Highway | B (65%) | D (80%) |

^aAssumes minimum set of intersection improvements defined in the South Natomas Community Plan.

^bSee Table 26 for definitions of levels-of-service.

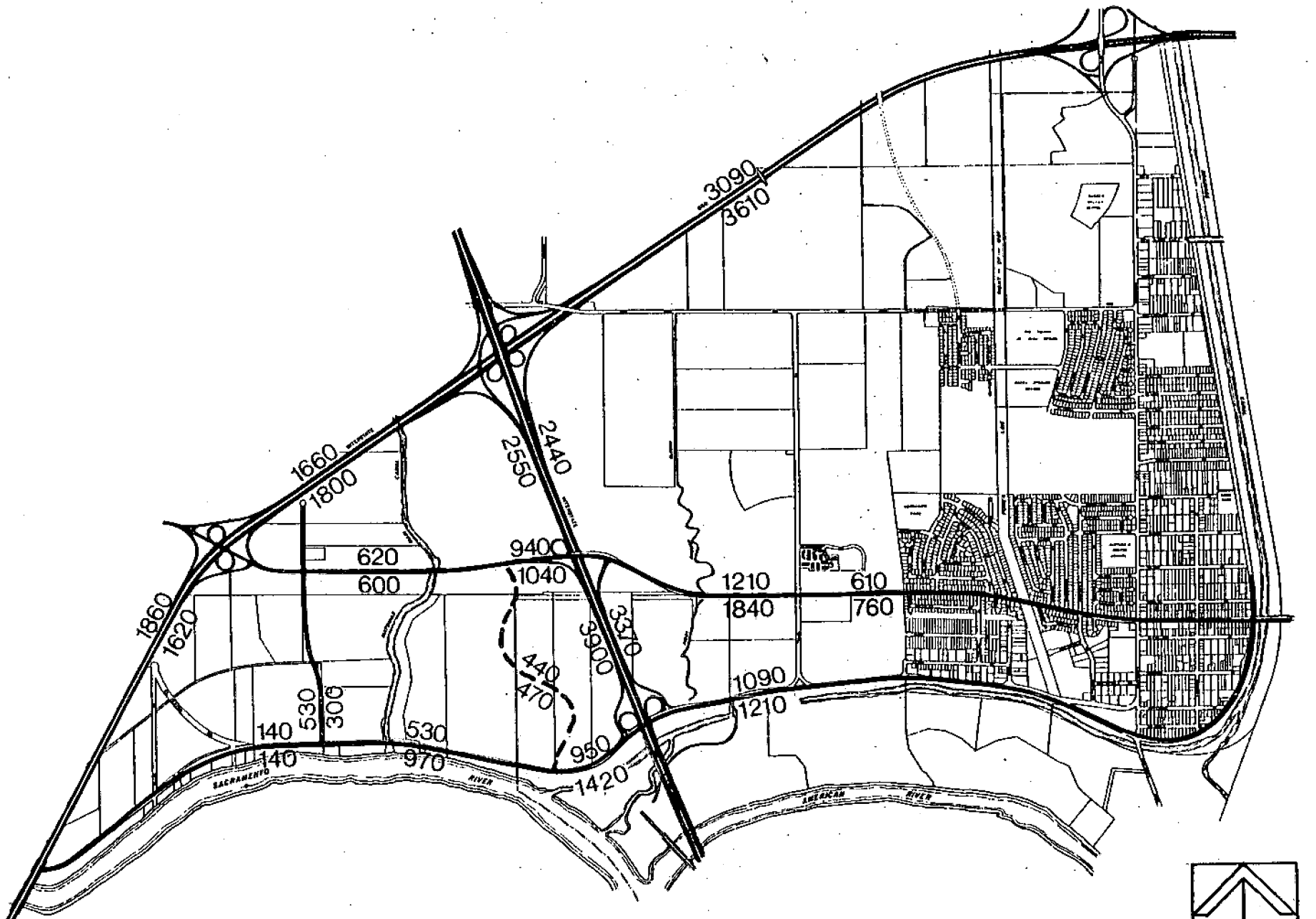
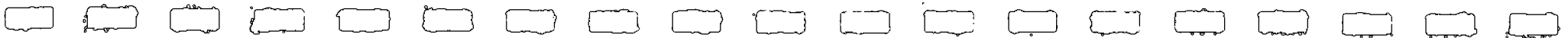
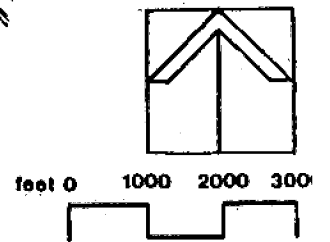


FIGURE 12
SNCP AM PEAK DIRECTIONAL TRAFFIC FLOWS
WITHOUT PROJECTS



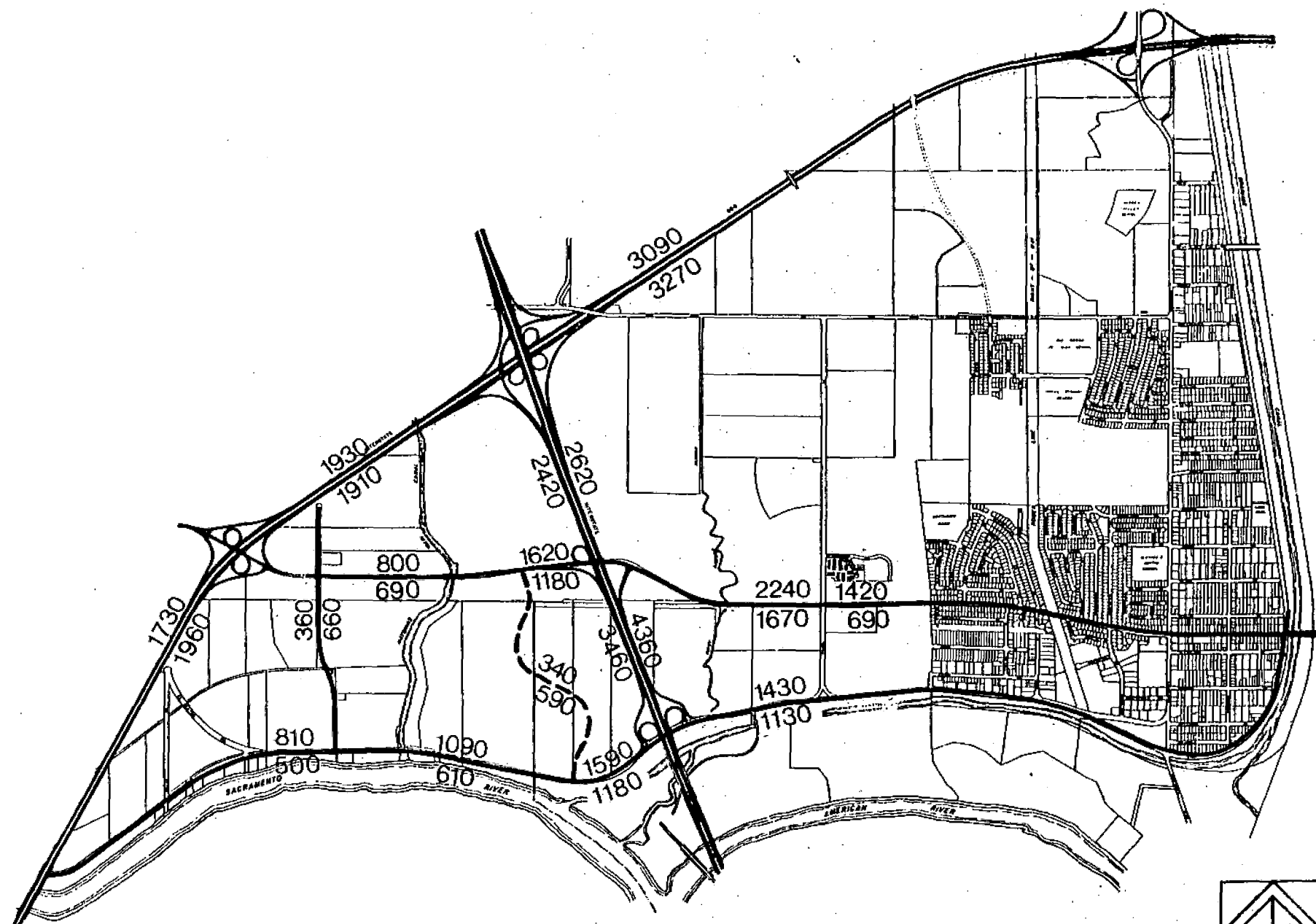


FIGURE 13
SNCP PM PEAK DIRECTIONAL TRAFFIC FLOWS
WITHOUT PROJECTS

Table 26
LEVEL OF SERVICE DEFINITIONS

| <u>Level of Service</u> | <u>Max. Percent of Capacity Used (Saturation)</u> | <u>Traffic Flow Characteristics</u> |
|-------------------------|---|--|
| A | 55 | Average overall travel speed of 30 mph or more. Free-flowing with no congestion. No signal cycle failures. |
| B | 66 | Average overall travel speeds of 25-30 mph. Very few signal cycle failures and little or no congestion. |
| C* | 77 | Average overall travel speeds of 20-25 mph. Occasional signal cycle failures and moderate amount of congestion. |
| D | 88 | Average overall travel speed of 15-20 mph. Frequent signal cycle failures and associated congestion. |
| E | 100 | Average overall travel speed of 15-20 mph. Unstable flow, including almost continuous signal cycle failures and backups on approaches to the intersections. Represents the theoretical capacity of the facility. |
| F | +100 | Jammed conditions, with average overall travel speed of below 15 mph. Continuous signal cycle failure with backup on approaches going through upstream intersections in some cases. |

*Note: The city of Sacramento in its design of new roadways requires an acceptable LOS of C.

PROJECT IMPACTS

The methodology and assumptions used in determining project-related traffic impacts are discussed in Appendix A.

a. Changes in Trip Generation

Average 24-hour and P.M. peak trip generation comparisons for the South Natomas community with and without the proposed projects are shown in Table 27.

(1) Project Effects. Project site traffic generation characteristics with and without the business parks are shown in Appendix A, Table A2. Buildout under current SNCP land use designations would result in roughly 57,000 average daily trips from the sites alone (typical weekday); approximately 2,466 of those would occur in P.M. peak hour. Buildout of the two sites with the proposed business parks would result in around 126,800 average daily trips (more than double the current plan figure) and roughly 7,100 P.M. peak hour trips. The increment of roughly 69,400 trips due to the projects represents roughly a 12.1 percent increase over trip generation levels anticipated from the SNCP.

As shown on Table 27, the Gateway Centre project would account for about 44 percent of the net traffic increase, and Natomas Eastside would account for 56 percent.

The most noticeable localized trip generation effects would be a 187 percent increase in P.M. peak hour outbound traffic from the Natomas Eastside and Gateway Centre sites combined, and a 56 percent increase in P.M. peak hour inbound traffic to the sites.

b. Local Analysis

(1) Traffic Volumes. Traffic volumes on many of the routes within the vicinity are would be substantially higher under the proposed project than under the SNCP according to projections in this analysis. The primary reason for the increased traffic is the replacement of residential land uses with commercial and business office uses which are higher trip generators.

Estimated A.M. and P.M. peak hour traffic volumes from the proposed projects are shown in Figures 14 and 15. These figures also show a directional flow pattern which is reversed from that under the SNCP. Traffic is attracted to the project area during the morning peak hour and away from the site during evening peak hour.

(2) Level-of-Service Comparisons. A comparison of A.M. and P.M. peak hour levels-of-service effects expected from the SNCP-generated traffic with and without the proposed projects for the 6 potentially critical intersections in the area is shown in Table 28 and Figure 16.

It is evident that the proposed project traffic would result in levels-of-service in the local traffic network which are significantly lower than levels resulting from SNCP policies now in effect. The following specific effects could be anticipated with construction of the projects by 1990:

Table 27
PROJECT CHANGES TO SOUTH NATOMAS COMMUNITY TRAFFIC GENERATION

| Land Use Type | Average Daily Trip (ADT) Rate | Total SNCP Area ADT w/o Project | ADT Changes Due to Projects | | | Total SNCP Area ADT w/ Project | Changes In PM Peak Hour Trips Due to Projects | |
|-------------------------------|-------------------------------------|---------------------------------------|-----------------------------|-------------------|-----------------|--------------------------------------|--|----------|
| | | | Natomas Eastside | Gateway Centre | Total Change | | Inbound | Outbound |
| Residential | | | | | | | | |
| 7-9 units/ac | 8/unit | 90,000 | -4,199 | -1,334 | -5,533 | 84,467 | -359 | -205 |
| 11-12 units/ac | 7/unit | 77,000 | -- | -2,908 | -2,908 | 70,140 | -207 | -105 |
| 22-23 units/ac | 6/unit | -- | -223 (a) | -3,729 | -3,952 | | -320 | -193 |
| Subtotal | | 167,000 | -4,422 | -7,971 | -12,393 | 154,607 | -886 | -503 |
| Commercial | 75/k.s.f. | 181,000 | +16,321 (a) | +18,404 | +34,725 | 215,725 | +1,697 | +1,360 |
| Offices | 15/k.s.f. | 58,000 | +26,847 | +20,253 | +47,100 | 105,100 | +942 | +2,316 |
| Highway & Strip Commercial | | 90,000 | No change | No change | No change | 90,000 | (Not Applicable) | |
| Industrial | | 7,000 | No change | No change | No change | 7,000 | (Not Applicable) | |
| TOTALS | | 503,000 | +38,746 | +30,686 | +69,432 | 572,432 | +1,753 | +4,625 |
| Percent Change | | | (+7.7%) | (+6.1%) | (+13.8%) | | | |

(a) SOURCE: CH2M HILL, Wagstaff and Brady. Approximations based upon SNCP Land Use Map; acreage figures in the SNCP, p. 16; 1981 city staff estimates of development intensity; and Caltans trip generation rates by land use.

- A totally unacceptable A.M./P.M. LOS "F/F" at the intersections of Natomas Oaks Drive/West El Camino and the I-5 Southbound offramp/Garden Highway that would not occur under the SNCP.
- An unacceptable A.M./P.M. LOS "F/B" at the I-5 northbound off-ramp/West El Camino intersection as compared to a congestion-free "A/B" under the SNCP.
- An unacceptable A.M./P.M. LOS "A/F" at the Natomas Oaks Drive/Garden Highway intersection, as compared to a free-flowing LOS "A/A" under the SNCP.
- A decrease in LOS at remaining critical intersections, but to levels which would still be acceptable ("C" or above).

Table 28
SOUTH NATOMAS COMMUNITY PLAN VERSUS PROPOSED PROJECT PEAK HOUR
LEVELS OF SERVICE AT CRITICAL INTERSECTIONS^a

| Intersection | Peak Hour Levels of Service ^b | | | |
|--|--|---------|----------|----------|
| | Community Plan | | Proposed | Project |
| | A.M. | P.M. | A.M. | P.M. |
| Natomas Oaks Dr./West El Camino | B (62%) | C (77%) | F (119%) | F (142%) |
| I-5 Northbound Off-Ramp/ West El Camino | A (43%) | B (59%) | F (115%) | B (73%) |
| Natomas Oaks Dr./Garden Highway | A (43%) | A (51%) | A (49%) | F (104%) |
| Orchard/West El Camino | A (46%) | A (52%) | B (58%) | C (67%) |
| I-5 Northbound Off-ramp/ Garden Highway | A (41%) | B (56%) | B (65%) | C (73%) |
| I-5 Southbound Off-ramp/ Garden Highway | B (65%) | D (80%) | F (126%) | F (122%) |

SOURCE: CH2M HILL

^aAssumes minimum set of intersection improvements defined in the SNCP.

^bSee Table 25 for a definition of Levels-of-Service.

c. Regional Analysis

(1) Trip Distribution Assumptions. The assignment of project-related trips to internal collectors, arterial streets, and freeways was based on typical trip distribution patterns for the Sacramento area. It was estimated in the POPULATION, HOUSING, AND EMPLOYMENT section of this report that approximately 30 percent of project employees would live in the South Natomas area; therefore, a relative portion of home-to-work trips would occur within the study area (referred to as "internal" trips). The remaining commute trips (70 percent) would be attracted to and from areas external to the study area. Assumed trip distribution patterns and average miles travelled (AMT) are shown in Table 29. The directional orientation of the distribution patterns did not change between the SNCP and the proposed project.

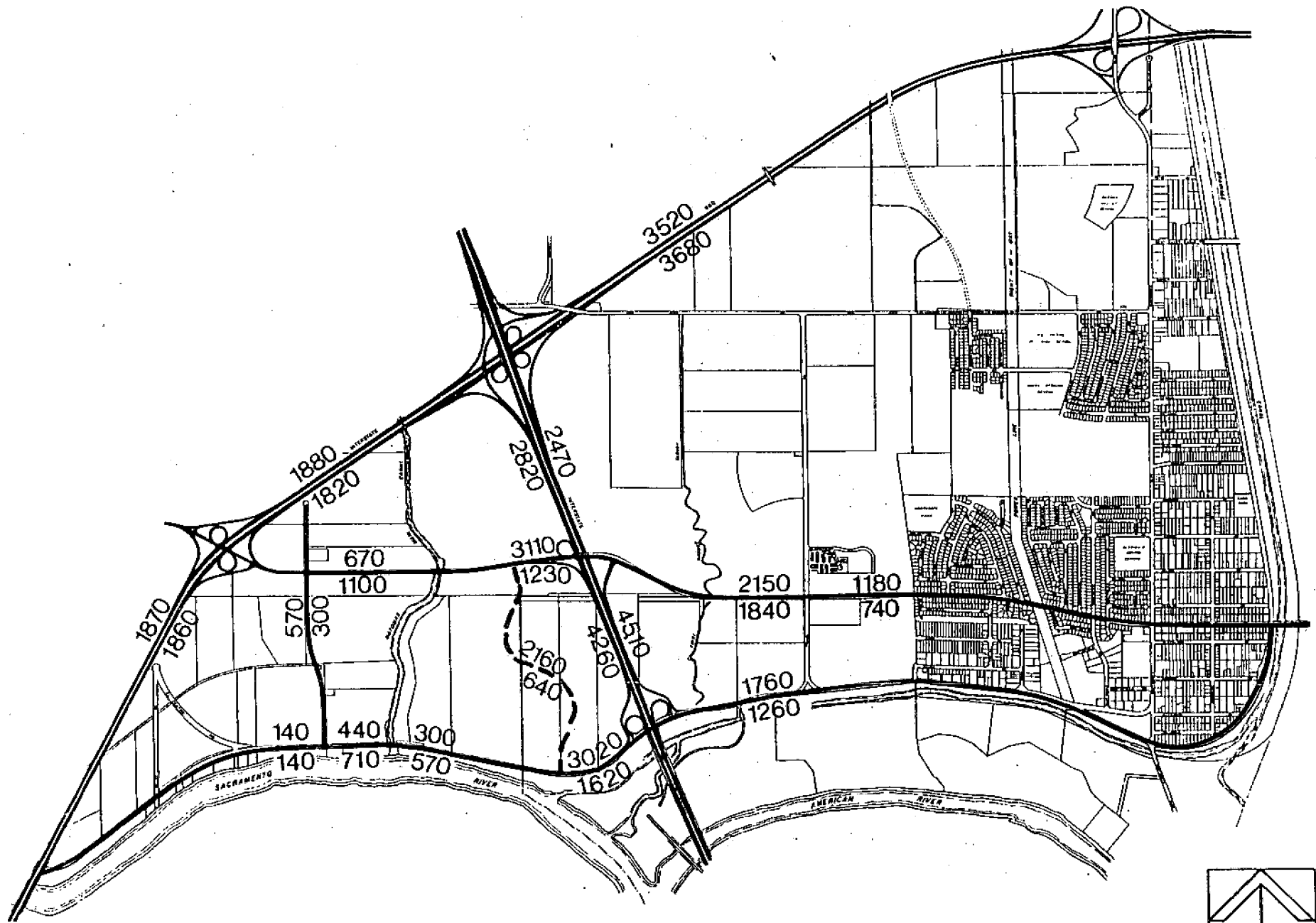
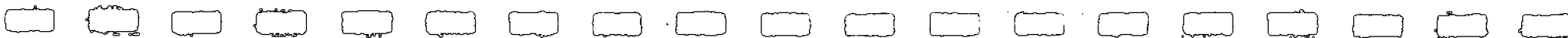
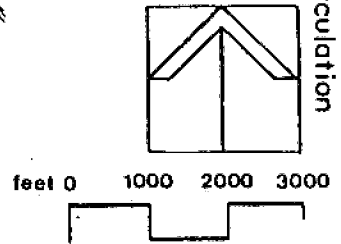


FIGURE 14
SNCP AM PEAK HOUR DIRECTIONAL FLOW
WITH PROJECTS



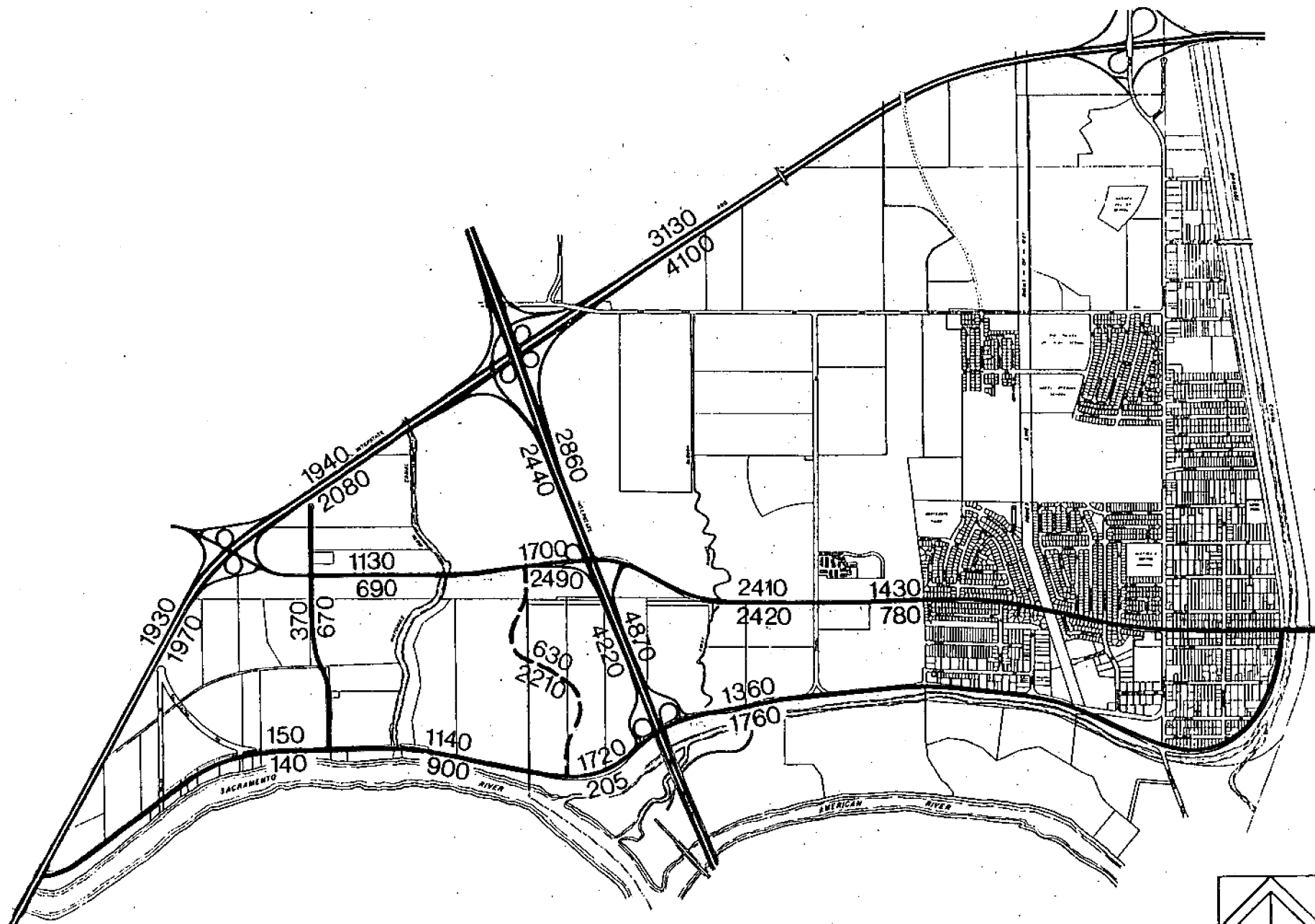
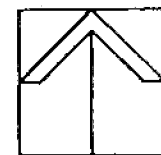


FIGURE 15
SNCP PM PEAK HOUR DIRECTIONAL FLOW
WITH PROJECTS



feet 0 1000 2000 3000



* Peak Hour Level of Service
(highest AM or PM figure shown)

A/B L.O.S. with projects
A/B L.O.S. without projects

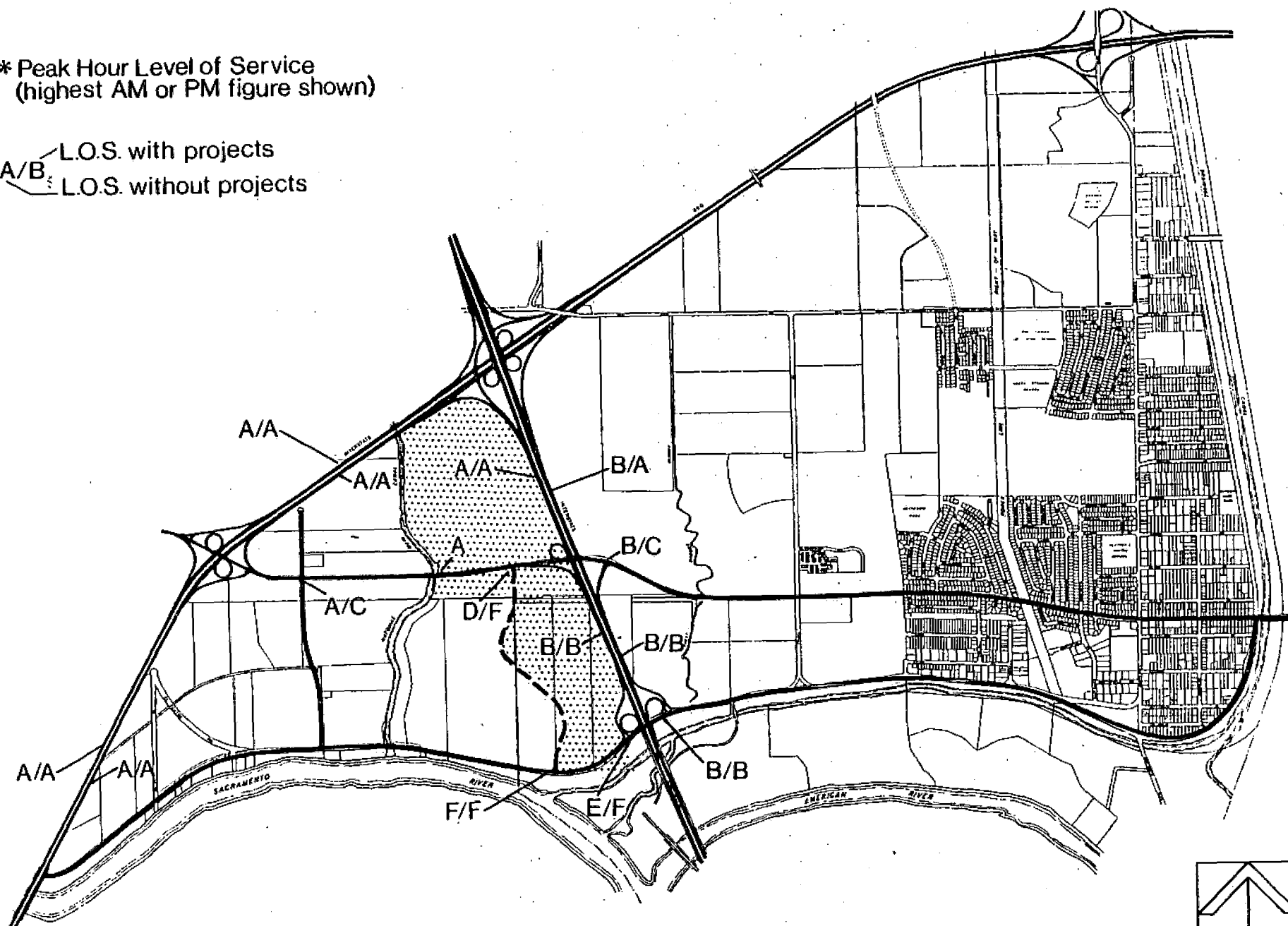
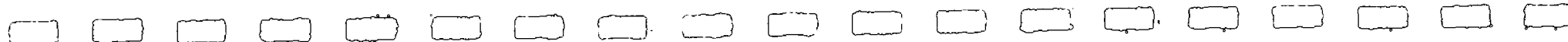


FIGURE 16
IMPACT COMPARISON-- PEAK HOUR L.O.S.*
SCNP BUILDOUT WITH AND WITHOUT PROJECTS



(2) Levels-of-Service Effects. The incremental impacts of the proposed projects on regional traffic flow patterns are not nearly as constraining as they would be at the local level. The additional traffic increment generated by the project in comparison to SNCP buildout effects would represent an insignificant percentage of total traffic volumes in the regional network. Consequently, the levels of service on roadways outside of the project area are not expected to be lowered as a result of this project.

(3) Peak Flow Direction. The direction of peak flow on facilities serving regional traffic demands (such as I-5 and I-880) would also not change significantly between SNCP buildout scenarios with and without the proposed projects.

(4) Vehicle Miles Travelled. As shown on Table 27, vehicle miles travelled (VMT) have been calculated by multiplying the average miles travelled in each direction by the percent of average daily trips. Data in Table 30 indicate that the proposed projects would increase site-generated vehicle miles travelled by 121 percent.

Table 29
TRIP DISTRIBUTION PATTERNS

| <u>Trip Distribution by Direction</u> | <u>Average Miles Travelled</u> | <u>Proportion of Trips Attracted to Project Site</u> |
|---|------------------------------------|--|
| West (I-880) | 15 | 5% |
| South/Southeast (I-5) | 9 | 45% |
| East (Northgate, etc.) | 6 | 15% |
| North/Northeast (I-5, Northgate, etc.) | 11 | 25% |
| Internal | 2 | 10% |
| TOTAL | | 100% |

SOURCE: CH2M HILL

Table 30
COMPARISON OF SITE GENERATED SOUTH NATOMAS COMMUNITY PLAN AND
PROPOSED PROJECT VMT

| Trip Distribution by Direction | Project-Site-Generated Vehicle Miles Travelled | |
|-----------------------------------|---|--------------------------|
| | SNCP | Project |
| West | 43,020 | 95,087 |
| S/SE | 232,272 | 513,471 |
| East | 51,612 | 114,105 |
| North/NE | 157,707 | 348,645 |
| Internal | 11,470 | 25,356 |
| TOTALS | 496,081 | 1,096,672 (+121% change) |

SOURCE: CH2M HILL

Assumptions:

- All traffic going south would use either I-5 or Northgate;
- All traffic going west would use I-880; and
- All traffic going east and northeast would use I-880 and El Camino.

3. MITIGATION MEASURES

Obviously, a basic impact mitigation measure would be to change the land use characteristics of the two projects to an alternative which would increase projected service at surrounding intersections to levels similar to or better than those projected with current SNCP buildout. Of the six project alternatives suggested by city staff and evaluated in this report (see ALTERNATIVES section), one--the "North Natomas" scheme--would result in a significantly reduced traffic impact. The North Natomas alternative would retain current SNCP land use policies for the project sites while accommodating 3.35 million square feet of commercial office on a site near the I-5/Del Paso Road intersection in North Natomas.

The measures below are recommended for consideration as steps necessary to mitigate traffic impacts of the proposed land use changes (Natomas Eastside and Gateway Centre projects). Before requiring any of the following improvements, an investigation of the physical constraints and economic feasibility of each should be considered. (Such an investigation is beyond the scope of this report.)

a. Natomas Oaks Drive/West El Camino Avenue Intersection Improvements. Provide: three through-lanes in each direction on West El Camino; separate lanes for all turn movements on all approaches; dual left-turn lanes on all but the west approach; two through-lanes on the south approach and one on the north approach. These improvements would result in an LOS improvement to "C/D" during the critical P.M. peak hour, with the projects.

b. I-5 Northbound Off-Ramp/West El Camino Avenue Interchange Improvements.

Provide three left-turn lanes from off-ramp onto West El Camino and a fourth through-lane in the westbound direction on West El Camino. These improvements would result in an LOS improvement to C during the critical morning peak hour, with the projects.

c. Natomas Oaks Drive/Garden Highway Intersection Improvements. Provide a separate right-turn lane and three left-turn lanes on the north approach, three through-lanes in each direction on Garden Highway, and separate turn pockets on Garden Highway. These improvements would result in a LOS improvement to C during the critical evening peak hour, with the projects.

d. I-5 Southbound Off-Ramp/Garden Highway Intersection. The unacceptable level-of-service (LOS F) with the projects during P.M. peak hour would require major capital expenditures such as construction of a free right turn for Garden Highway eastbound to join I-5 southbound movements. Improvements to this intersection are not likely to be included in capital expenditure plans for the near future.

e. Comprehensive South Natomas Capital Improvements Program. Due to the major offsite roadway improvements that would be required to accommodate the proposed project, it would be appropriate that the city undertake a comprehensive program to define areawide circulation needs, and in response to those needs, develop a phased capital improvements plan. This plan should include an outline and priorities for specific improvements necessary to accommodate incremental increases in traffic flows generated by new development in the area.

Financing for development and implementation of the capital improvements plan could be obtained through an equitable scheme, whereby project sponsors would contribute to some degree determined by the city on the bases of project size, location, and traffic-generation capabilities.

Design features of such a plan should include mitigation measures listed above. Because specific improvements would, in effect, be individual projects, mitigation measures for the construction and growth-inducing impacts of these projects should be considered during the development of the plan.

f. Flex-Time or Shortened Work Weeks. The city should require that the project developers promote among future tenants a flex-time program, where employees may choose their arrivals between set times, such as 7:00 and 9:00 a.m., or shortened work weeks (four, 10-hour days staggered throughout the week). Both are potentially effective measures to reduce standard peak-hour traffic levels. By spreading out peak outbound and inbound periods over several hours, levels of congestion at impacted intersections could be improved.

Office firms have proven to be more suited to flex-time and adjusted work weeks than are industrial and commercial uses.⁴ For the proposed projects, office uses would account for over 50 percent of peak hour outbound and inbound trips (see Table 27). Rescheduling of these trips over a period of several hours (e.g. 3 to 6 p.m.) could result in as much as a 50-60 percent reduction in office peak hour trips, or in the case of the projects, as much as a 25 to 30 percent reduction in total peak hour trips. Such trip reductions would improve peak hour levels-of-service at

critical nearby intersections. The real effectiveness of such programs would be dependent upon the participation rate of project tenants, and the spacing of trips by those participants.

(Note. Establishment of a van-pooling program would not be an effective measure for reducing project traffic generation in this case. Van-pooling works best for long home-to-work trips where trip origins and destinations are concentrated in small areas, desired arrival times are clustered within a short-time period, and private automobile travel faces such disincentives as severe peak-hour congestion and parking difficulties. Experience shows that van-pools are most successful when sponsored by single companies with large numbers of employees--generally 500 or more--in one location.⁵ For these reasons, it seems unlikely that van-pooling at the proposed South Natomas business parks would effectively supplement conventional public transit service or significantly reduce vehicular trips.)

4. REFERENCES

a. Footnotes

¹CH2M HILL/Wagstaff and Brady work session with city staff (Carstens, Bloodgood, Parker), April 8, 1981.

²Michael Wiley, SRTD, July 24, 1981.

³Ibid.

⁴Engineering News Record, "Flexible Hours Little Used." August 16, 1981.

⁵Urban Mass Transportation Administration, Para-Transit, A Summary Assessment of Experience and Potential, June 1979.

b. General

Caltrans, Trip Generation Study, 9th Progress Report, 1975.

Highway Research Board. Highway Capacity Manual. Special Report 87, 1965.

Transportation Research Board, Interim Materials on Highway Capacity. Transportation Research Circular 212, 1980.

JHK & Associates General Traffic Impact Assessment of Gateway Centre (1981).

G. PUBLIC SERVICE AND FISCAL ASPECTS

I. SETTING

Public service and fiscal concerns raised by the projects include: (a) their capital improvement or one-time infrastructure needs and related fees, and (b) their ongoing operating expenditures, taxes, and assessments.

Since the passage of Proposition 13, there have been great changes in the manner in which public services are funded. While property taxes were the principal source of local governmental revenue in the past, development fees and assessments in conjunction with direct developer installation of on-site infrastructure--such as streets, sewers, water systems, and drainage--are now the norm. Thus, much of the Fiscal Impacts section of the 1978 SNCP EIR is no longer applicable.

a. Status of Existing Public Services

The following municipal functions provided to neighborhoods in the city of Sacramento would be most significantly affected by new development:

(1) Public Safety.¹ Police and fire protection account for almost 34 percent of the 1980-81 Sacramento city budget.

- The Sacramento Police Department has 512 sworn officers, a ratio of approximately 1.85/1,000 population. This ratio has declined in recent years; the number of officers has remained static despite increases in city population.
- Police protection is provided to the South Natomas area from the central station, downtown (3 minutes from the site).
- Fire department staff has remained relatively constant as well. One fire station is scheduled to be closed soon when two downtown fire stations are consolidated into one new station.
- An additional fire company and station is programmed for the South Natomas area to allow proper response to the number of dwelling units and amount of office and commercial space anticipated with SNCP buildout.

(2) Public Works.² Public works--including administration of streets, facility maintenance, parking facilities, inspections, traffic engineering, water and sewer system operation, waste removal, and animal control--accounts for another 29 percent of the 1980-81 city budget.

- Street maintenance is funded directly through the municipal budget. Gasoline and vehicle in-lieu subventions from the state are the primary revenue source for this activity, although it has been necessary to supplement these funds with additional revenue from the general fund. New developments in the city that

result in additional street mileage will increase the maintenance budget for street cleaning, initially, and for street repairs, ultimately.

- Several of the principal municipal functions, however, such as water, sewer, and waste removal, can be categorized as enterprise activities that charge fees for service that basically offset costs to the city. For example:
 - Sewer connection fees are charged; charges represent a "buy-in" to the new regional trunk, interceptor, and treatment system;
 - The cost of major new roads and road widenings, including arterials, must now be provided largely by developers as a condition for building permits on property to be served, the municipal cost for provision of new roads is limited to center lane construction; and
 - Drainage services are provided to the area by Reclamation District 1000, a special district that serves the northwest quadrant of the metropolitan area. Within the South Natomas area, the District operates the Natomas Main Drainage Canal and a lift station/pumping plant that drains into the Sacramento River. The district also maintains the levees (Garden Highway) and would have jurisdiction over any levee modifications. Assessment districts are created to fund capital expenditure needs and to meet the on-going costs of operating and maintaining the drainage system; thus this service also does not affect the cost of governmental services to the general taxpayers.

(2) Community Services.³ The Parks and Recreation Department accounts for 9.5 percent of the 1980-81 city budget. A standard of 5 acres per 1,000 persons is used for determining park requirements for the city of Sacramento.

There are two major community service fees or taxes levied on new residential development. These are the residential construction tax and the recently enacted Park Land Dedication Ordinance. These two fees together are sufficient to fund 70 percent of the cost of acquiring and developing new parks, which is currently approximately \$90,000 per acre. Thus, there is a net cost to the city of \$27,000 for each new acre of park.

Park operating and maintenance costs average \$4,600 per acre annually.

(3) Schools.⁴ The Natomas Union Elementary School District and Grant Joint Union High School District serve the portions of South Natomas under consideration for office space and additional commercial development.

Student generation rates for new housing have been relatively low at 0.3 students/unit for elementary and lower for high school. Nevertheless, the magnitude of additional housing anticipated with the existing SNCP would require additional elementary schools.

State funds for permanent elementary school construction normally lag several years after need is recognized, but have been made available eventually. Although the Sacramento City Council has not applied for state funds for impacted school

districts in the South Natomas area, several developers of major residential projects have made voluntary contributions allowing districts to provide temporary facilities.

Approximately 90 to 95 percent of school operating costs are met through state subventions based on average daily attendance. Thus costs associated with additional students are met by funds provided from outside the district.

The high school district presently has available capacity and buses students to available space. Operating funds also come primarily from state subventions.

(4) Transit.⁵ The Sacramento Regional Transit District (SRTD) presently provides no service in the portions of South Natomas west of I-5. Service to areas east of I-5 may be discontinued soon due to low ridership and loss of funding. SRTD has recently adopted a policy of no service extensions into newly developing areas unless additional subsidy support is derived. No transit system can operate without subsidy. The SRTD receives about 20 percent of revenues from fares.

Given recent levels of increases in operating costs, and the expectation of decreased or eliminated federal support, it appears unlikely that transit service will be extended to the area in the short term unless special funding sources are developed.

On the other hand, since a desire for good transit service to the CBD has been expressed by the community,⁵ and since present funding problems may not be applicable to long-term planning (1990-2000), it has been assumed in this analysis (based largely on opinions of SRTD staff) that some form of peak-hour South-Natomas-to-CBD transit service would be provided in the future with buildout of the South Natomas area.⁶

b. Revenue Sources⁷

(1) One-Time Fees. In addition to the city park and recreation development taxes and dedication requirements for residential development, there are three other major one-time development fees associated with all private development. These are the construction excise tax, building permit fees, and sewer connection charges.

- Construction Excise Tax. For non-residential development, this tax is calculated at the rate of one percent of construction and development costs. For residential projects, the tax is calculated on the basis of an \$18 per square foot construction cost, or approximately 50 percent of the actual 1980-81 cost of residential construction in Sacramento (excluding land).
- Building Permit Fees. These are also assessed on the basis of \$18 per square foot for residential property and actual construction cost for non-residential property. A 65 percent plan check supplement is also charged for non-residential projects. However, this additional fee is used to hire consulting engineers to review plans; thus the additional revenues are totally offset by additional costs.
- Sewer Connection Fees. These are \$120 per unit for housing and \$1,080 per acre for non-residential development. This represents a buy-in to the regional system.

(2) On-Going Revenue Sources: There are several primary revenue sources to meet the operating costs of governmental agencies. These include property taxes, sales taxes, utility users taxes, business license taxes, property transfer taxes, and state and federal subventions.

2. IMPACTS

This section compares the public service and related cost and revenue effects of SNCP buildout with and without the proposed land use changes.

a. Changes in Base Data

The basic characteristics of the project sites with the proposed business parks are compared on Table 31 with 1981 estimates of SNCP buildout without the projects. The following types of change in site characteristics are considered:

- The net change in dwelling units, population, employment, acres, and square footage of office and retail commercial space;
- The expected value of improvements and land; and
- The loss of residential taxable value (a factor that reduces the gains in value associated with substituting the non-residential uses for housing units).

In calculating property taxes and construction costs for this analysis, respective office and commercial replacement values are assumed to be \$70 and \$55 per square foot, land value is assumed to be \$350,000 acre per vacant, finished site for office and commercial development, and residential property values in South Natomas (land and improvements) are assumed to range from \$60,000 to 80,000 per unit, depending on density.

An analysis of incremental one-time and continuing public service costs and revenues associated with the proposed business parks as compared to the approved SNCP land uses is presented in the following paragraphs.

b. Changes in Public Service Needs

(1) Public Safety. The following service need assessments are based on comparisons made by each of the servicing agencies of project versus existing plan characteristics:

- Neither the projects nor the plan would have a major effect on police capital expenditures. Police operating costs are related to several variables. Population and population density are two key indicators, as is the number of 14 to 18 year old residents in an area (a high proportion of vandalism and theft are committed by this age group).

Sacramento Police officials stated that project reductions in the number of residents and additions in office space could result in less demand for police services. A police representative stated that the exact amount of service reduction cannot be accurately measured.⁸

- Fire protection costs would not be affected by the proposed substitution of low-rise office space for housing in the South Natomas area. A fire department representative indicated that an additional station and fire company will be required for any new development in South Natomas west of I-5.⁹

Table 31
CHANGES IN SNCP AREA BASE DATA RESULTING FROM PROPOSED LAND
USE CHANGES AS COMPARED TO NO PROJECT^a

| | <u>1981 Estimate</u> | <u>w/Natomas Eastside</u> | <u>w/Gateway Centre</u> | <u>w/Natomas & Gateway</u> |
|--|--------------------------|-------------------------------|-----------------------------|------------------------------------|
| Dwelling Units | 21,700 | -576 | -1,211 | -1,787 |
| Population | 54,300 | -1,440 | -2,710 | -4,368 |
| Employment | 7,161 | +8,260 | 6,620 | +14,890 |
| Net Acres Office | 30 | +86 | 75 | 154 |
| Square Feet Office (000) | 537.0 | 1,900 | 1,450 | 3,350 |
| Net Acres Commercial | 99 | +9 | +10 | +19 |
| Square Feet Commercial (000) | 742.5 | +67.5 | +75 | +142.5 |
| Office and Commercial Re- placement Value (\$000,000) ^b | 78.4 | +116.6 | +105.6 | +222.2 |
| Office and Commercial Land Value (\$000,000) ^c | 45.2 | +34.7 | +29.7 | +64.4 |
| Residential Value (\$000,000) ^d | | -51.0 | -72.6 | -123.6 |

^a1981 estimates of population and dwelling units anticipated with the approved South Natomas Plan.

^b\$70/square foot for office, \$55/square foot commercial

^c\$350,000/acre

^dIncludes replacement of higher value low density units with lower value higher density units.

SOURCES: City of Sacramento Dept. of City Planning; LeBlanc & Company

(2) Public Works. All major on-site infrastructure would be provided by developers. Therefore, the proposed changes in South Natomas land use would have no effect on public works capital expenditures.*

* Road center lane construction costs to the city under current SNCP buildout plans would not change with the proposed project.

- Road and traffic signal maintenance needs would increase with the increased average daily and peak-hour traffic generated by project office uses. Offsetting this would be a reduction of street maintenance needs associated with the fewer miles of public streets necessary to serve the proposed uses. Low rise office complexes require a lower proportion of land use in public streets than do housing developments.¹⁰
- Water and sewer mains are being extended to the area under the approved Natomas Oaks development plan.

Substitution of office use for residential use in South Natomas would reduce demand for water and sewer service in the area. This reduction is perceived as a benefit by County Public Works staff who feel that the level of housing development accommodated in the existing South Natomas plan may exceed the capacities of trunk and interceptor lines "downstream" from the area.¹¹

- Drainage costs would be higher as a result of project increases in office and commercial acreage. Rainfall runoff from such use is approximately 50 percent higher than from typical residential use due to associated increases in impervious surfaces.¹² However, an assessment district will be created to meet any required capital and operating costs for drainage channels and pumping. Therefore, all costs will be borne by users in the area in direct proportion to generation and there will be no fiscal effects on public agencies or residents outside the area.

(3) Community Services. Project-related reductions in the amount of housing units in South Natomas would provide fiscal benefits to the city, both in one-time capital expenditures to develop parks, and a reduction in the acreage of parks to be maintained.

Based upon current city park provision ratios, the Natomas Eastside and Gateway Centre projects together would require 21.5 fewer acres of public park than would the housing-intensive land use mix designated in the existing plan. The public savings in initial capital expenditures resulting from the net capital cost to develop parks (\$27,000 per acre after residential recreational fees are used) would amount to \$580,000. In addition to initial capital expenditures, an annual savings of \$100,000 in maintenance costs (\$4,600 per acre) for the Natomas Eastside and Gateway Centre projects would be realized.¹³

(4) Schools. The Gateway Centre project alone and the two projects together** would diminish the number of elementary students sufficiently to reduce by one the number of schools required to serve the South Natomas area. The SNCP school land area would be reduced by 6 percent; total residential acreage would be reduced by 8 percent. However, since new schools are financed by developer contributions and state funds, the project effect provides no measurable fiscal benefit to local taxpayers.

** Gateway Centre alone would displace 1,211 planned residential units; Natomas Eastside would displace another 576 planned units.

Operating costs may be calculated on a per student basis, but again they are funded primarily from state funds. Thus, any savings in the South Natomas area west of the freeway would be spent elsewhere. Approval of the projects would not materially affect the Grant Union High School District.

(5) Transit Services. The SRTD has indicated concern that converting site lands from housing to office use would result in a South Natomas land use pattern less amenable to efficient transit service.

The primary focus of discretionary transit trips in the Sacramento metropolitan area (those made by riders who have the option of using a car), has been between residential areas and the downtown. Although SRTD does not presently anticipate being able to serve the area under any land use alternative, future (1990-2000) transit service may be established in some form to serve peak-hour commuters.^{14A} 6 percent AM/PM modal split is assumed herein under TRANSPORTATION.

Estimating the cost-revenue effects of changes in future transit service levels due to the project would be highly speculative, given uncertainties regarding the level of state and federal subsidy (not a local cost), and degree of farebox increase that can be anticipated. Generally, if service was limited exclusively to peak hours, the degree of subsidy would not be large. If service was provided on an all-day basis, a higher degree of public subsidy would be required. It is less likely that transit would be used for a work trip to an office in the South Natomas area since service potentials (number of headways and stops) would be significantly fewer than for the central area.

c. Changes in Public Revenue Generation

(1) One-Time Taxes and Fees. There are three major city and county fees on new construction--the construction excise tax, building permit fees, and sewer connection fees. Project effects on these one-time fees (apart from the residential fees that are charged on new housing units to contribute to the cost of required parks) are itemized in Table 32 and described below.

- Construction Excise Tax. The major source of one-time city revenue is the construction excise tax. The tax is calculated at the rate of one percent of construction and development costs with the exception of residential projects, which are calculated on the basis of \$18 per square foot. Using typical respective replacement values of \$70 and \$55 per square foot for office and commercial uses, considerably higher revenues are generated by the proposed projects since they emphasize these uses.

Estimated additional municipal revenues from the construction excise tax due to the proposed land use changes would be approximately \$753,000 for Gateway Centre, \$926,000 for Natomas Eastside and \$1,679,000 for the combined projects.

Table 32
ESTIMATED DIFFERENCES IN ONE-TIME GOVERNMENTAL REVENUES FROM
PROJECT SITES DUE TO PROPOSED LAND USE CHANGES AS COMPARED TO
NO PROJECT^a (x \$1000)

| | <u>Natomas Eastside</u> | <u>Gateway Center</u> | <u>Both Projects</u> |
|----------------------------|-----------------------------|---------------------------|--------------------------|
| Construction Excise Tax | +926 | +753 | +1,679 |
| Building Permit Fees | +34 | +60 | +94 |
| Sewer Connection Fee | <u>+30</u> | <u>-53</u> | <u>-23</u> |
| TOTAL CHANGE | +990 | +760 | +1,750 |

SOURCE: Lloyd LeBlanc and Company, based on square footage figures.

- Building permit fee revenue differences would be less significant. Increases in permit fees due to the projects would amount to approximately \$60,000 for Natomas Eastside, \$34,000 for Gateway Centre, and \$94,000 for the two projects together.
- Sewer connection fees are determined at a rate of \$120 per unit for housing and \$1,080 per acre for non-residential development. Under this fee structure, one-time contributions towards the cost of trunk, interceptor, and treatment capital investment to serve all of South Natomas would actually be lower for the proposed land use changes, due to the amount of residential displacement. On the other hand, since less sewage would be generated by the office uses, the reduction of revenue could not be a problem according to city staff representatives.¹⁵
- In sum, additional one-time revenues to the city from the three fee sources would amount to approximately \$990,000 from Natomas Eastside and \$760,000 from Gateway Centre, for an approximate total of \$1.75 million for the combined projects.

(2) Annual Taxes and Fees. Table 33 is a summary of the major differences in governmental operating revenues associated with the proposed changes in land use. Factors contributing to these differences are described in the following paragraphs.

- Property Taxes. Because property tax rates were substantially reduced in relation to the pre-Proposition 13 levels subsequent to preparation of the 1978 SNCP EIR, estimates herein of additional revenues from property taxes resulting from office space development are lower than those determined in the fiscal analysis portion of the SNCP EIR. Using the present tax rate of \$4.40/\$100 of assessed

value (one quarter of market value), the total property tax yield increase would be approximately \$1.10 million from Natomas Eastside, \$690,000 from Gateway Centre, and \$1.79 million from the two projects together. These totals include revenue to all agencies; the city of Sacramento receives 12 percent of these property tax revenues. Thus, the net gain to the city from property taxes would be \$215,000 from the projects.

- **Sales Taxes.** Project sales tax effects are also summarized in Table 33. These calculations include an assumption that sales tax differentials are related to square footage of commercial space. Since the Natomas Eastside and Gateway Centre proposals would increase the square footage of commercial space in South Natomas, these options would generate more sales tax revenues.
- **Subventions.** Other major sources of local governmental revenue are state and federal subventions. Several state subventions, such as motor vehicle in-lieu fees, the gas tax, and the cigarette tax, are population based. Thus, since the proposed change in land use from residential to office would diminish the area's future residential population, these revenues to the city (\$24.00 per capita in 1980) would also be reduced.

Federal general revenue sharing and community development block grant programs are based on formulas that consider population and a variety of need factors, such as unemployment rates, economic growth rates, and population growth. Approximately 50 percent of such grants are usually related to population. Thus, a portion of these funds would be deleted, as shown in Table 33, because the proposed land use mix reduces the residential potential in the area.

- **Other Revenue Sources.** There are a variety of other municipal sources of revenue, including utility users taxes, business license taxes, and property turnover taxes. Assessment of the net effect of the proposed land use changes on these revenues would be too highly speculative without additional information on prospective space uses and turnover rates in building ownership.

Historically, housing units have turned over more frequently than office buildings. Thus revenues from a turnover tax may be greater from residential uses. Reappraisals for property taxes may be more frequent as well. Recent evidence suggests, however, that residential turnover of owner-occupied units is decreasing rapidly because of financing costs and higher property taxes associated with new mortgages and higher prices. Offsetting project-related losses in potential turnover and property taxes from residential development would be added business license taxes based on business park tenant annual gross. Given the multitude of factors that would affect these various taxes, it has been assumed, based upon extensive experience in similar fiscal analyses, that differences would tend to offset each other and would not be substantial. Thus, no significant differences have been assumed for these other taxes and fees.

Table 33

ESTIMATED DIFFERENCES IN ANNUAL PUBLIC REVENUES FROM THE PROJECT SITES DUE TO PROPOSED LAND USE CHANGES AS COMPARED TO NO PROJECT (x \$1000)

| | <u>Natomas Eastside</u> | <u>Gateway Centre</u> | <u>Both Projects</u> |
|--|-----------------------------|---------------------------|--------------------------|
| Total Property Tax | (+1,100) | (+690) | (+1,790) |
| Sacramento City Revenues | | | |
| Municipal Property Tax ^a | +132 | +83 | +215 |
| Sales Tax ^b | +64 | +71 | +135 |
| State Subventions ^c | -41 | -63 | -104 |
| Federal Subventions ^d | <u>-20</u> | <u>-31</u> | <u>-51</u> |
| Sacramento City Total | +135 | +60 | +195 |

^a12 percent of total property tax revenues.

^bCalculated at \$.95/sq.ft. of retail commercial space.

^cPopulation based subventions, primarily motor vehicle in-lieu fees, gas tax, and cigarette tax.

^d50 percent of general revenue sharing and community development block grants, the appropriate percentage based on population.

SOURCES: City of Sacramento City Managers Office; LeBlanc & Company.

(3) Summary of Relative Project Effects on Public Revenue Generation. Given a 1980-81 City of Sacramento operating budget of \$133,500,000, including enterprise services, the identifiable difference of +\$195,000 annually from the proposed Gateway Centre and Natomas Eastside land use changes combined (residential to office uses) would amount to considerably less than one percent of total municipal revenues. It should be noted, however, that the office-intensive projects would generate additional property taxes to the county and other agencies as well, as shown in Table 33 ("Total Property Tax"), and that a portion of all of the planned residential development displaced by the projects (the 1,800 units) would be constructed somewhere else within the city.

d. Conclusions

(1) Changes in Cost/Revenue Comparison. Table 34 is a summary of the outcome of the fiscal analysis for both capital and operating factors for the city of Sacramento. Conclusions based on this analysis are as follows: ...

- Using the capital expenditure and revenue data information made available by the various servicing agencies contacted for this analysis, it appears that the Natomas Eastside and Gateway Centre projects provide a net increase of one-time revenues, as compared with the existing SNCP.
- In the category of operating costs and revenues, the Gateway Centre and Natomas Eastside projects are again more attractive in terms of revenue surplus. The savings in community facility operations costs (primarily park maintenance) is added to additional tax revenues to produce a positive net differential of almost \$300,000 annually in comparison with the existing plan.

(2) Accuracy of Revenue and Cost Estimates. In considering this outcome, the revenue estimates are felt to be reasonably accurate forecasts of differences likely to result from the proposed project combinations of office space, commercial space, and housing units. The accuracy of cost estimates is less certain, since accurate comparative cost forecasts were not available from city agencies and other jurisdictions contacted during the course of this analysis.

(3) Utility of Cost/Revenue Estimates. Finally, given (a) the rapidly changing basis of tax revenues and expenditure patterns that has resulted from Proposition 13, and (b) the future changes that are anticipated in federal funding of urban programs, it is not advisable to rely heavily on the dollar amount outcomes of such fiscal analyses. Rather, the assessment should be viewed as a relative, order-of-magnitude comparison of the fiscal effects from the proposed change in SNCP land use, versus no change.

Table 34
ESTIMATED DIFFERENCES IN MUNICIPAL COSTS AND REVENUES FROM THE PROJECT SITES DUE TO PROPOSED LAND USE CHANGES AS COMPARED TO NO PROJECT (x \$1000)

| | Natomas Eastside | Gateway Centre | Both Projects |
|-----------------------------|---------------------|-------------------|------------------|
| <u>Capital (One-Time)</u> | | | |
| Costs ^a | -225 | -350 | -580 |
| Revenues | +990 | +760 | +1,750 |
| NET | +1,217 | +1,111 | +2,328 |
| <u>Operating (On-Going)</u> | | | |
| Costs ^b | -40 | -60 | -100 |
| Revenues | +135 | +60 | +195 |
| NET | +175 | 120 | +295 |

SOURCE: LeBlanc & Company

^aThe negative costs associated with the proposed land use changes are primarily affected by a major reduction in park development costs.

^bThe negative annual costs represent savings in park maintenance expenditures.

3. MITIGATION MEASURES

Suggested capital improvements planning and funding approaches to cover project-related road improvement costs are described in this report under TRAFFIC AND CIRCULATION, mitigation measures. Because of the net beneficial impacts described under IMPACTS, above, no additional mitigation measures for public service costs appear to be necessary.

4. REFERENCES

¹Rich Overton, Officer, Sacramento City Police Department; and Dennis Loheit, Inspector, Sacramento City Fire Department, 1981.

²Jim Bloodgood, Traffic Engineering, City of Sacramento; Doug Frederick, Sacramento County Public Works Division; and Tom Betts, Superintendent, Reclamation District 1000, 1981.

³Erling Linggi, City of Sacramento Community Services, 1981.

⁴Dr. Myron Cross, Superintendent, Natomas Union School District; and Marvin Delfendehl, Grant Joint Union High School District, 1981.

⁵Hinda Chandler, Sacramento Regional Transit Authority, 1981.

⁶Michael Wiley, Sacramento Regional Transit Authority, 1981.

⁷Tim Sullivan, Sacramento City Building Department, 1981.

⁸Rich Overton, Officer, Sacramento City Police Department, 1981.

⁹Dennis Loheit, Inspector, Sacramento City Fire Department, 1981.

¹⁰Jim Bloodgood, Traffic Engineering, City of Sacramento, 1981.

¹¹Doug Frederick, Sacramento County Public Works Division.

¹²Tom Betts, Superintendent, Reclamation District 1000, 1981.

¹³Linggi, op.cit.

¹⁴Wiley, op.cit.

¹⁵Frederick, op.cit.

H. ECONOMIC GROWTH AND BUSINESS PARK DEMAND CONSIDERATIONS

The proposal to change the land use designations of the 270-acre site from a 2255-unit residential neighborhood to a 3.66 million square foot office-commercial complex raises business park demand and economic justification questions such as:

- Do projected industrial growth trends and related office absorption outlooks justify the proposed 7-year, 3.35 million square foot office construction program?
- Are there other opportunities in the region for similar office development? How do the South Natomas sites compare with other locations in the Sacramento area?
- Will the proposed 3.66 million square foot office-commercial complex have a significantly adverse effect on the city's central business district?
- What overall economic growth benefits and liabilities would the projects bring?

This section describes the current business park market setting and related trends into which the projects would be introduced, evaluates the ability of the South Natomas sites to capture the proposed share of the office market, and comments generally on the market justification and economic benefits of the proposed land use changes.

I. EXISTING SETTING

a. Industrial Growth Trends and Outlook--Sacramento Region

(1) Background. As California's state capital and a notable center of agribusiness, Sacramento has since World War II experienced a strong and steady rate of economic expansion. Until recent years, the concentration of public employment in the area has provided the region (the tri-county area of Sacramento, Yolo, and Placer) with a stable economic base, attracting other population-serving uses.

Federal spending in the Sacramento region to date has been substantial, consisting of direct outlays, such as the McClellan AFB operating budget, and indirect support for major civil works, such as the water projects in the region, flood control, agricultural support programs, and the like.

Agriculture also continues to be a major element of commerce in the region, as does tourism, which gains in importance each decade and supports a significant service industry.

Major east and west highway routes (Interstate 80 and 880, U.S. Highway 50) are important to Sacramento as a major center on the principal east-west routes to and

from the Sierra and the East; other routes (Interstate 5 and U.S. Highway 99) connect the region to the Northwest and the remainder of central California. The new metropolitan airport, the Sacramento-Yolo Port and a strong rail service net add to Sacramento's assets as a location for a diversified economy.

(2) Industrial Employment Trends--1970 to 1980. A review of available statistics on regional growth in recent years illustrates strong economic expansion. Table 35 illustrates regional employment growth since 1970.

(a) 1970 to 1975. Table 35 indicates that total employment growth in the tri-county area increased from 263,000 to 313,000 between 1970 and 1975, a gain of 19 percent or roughly 3.8 percent annually. The average annual gain of some 9,900 new jobs was primarily due to growth in services (especially financial services) and in public employment categories. Federal employment declined slightly during this period.

Table 35
EMPLOYMENT GROWTH IN SACRAMENTO REGION (SACRAMENTO, YOLO, & PLACER COUNTIES), 1970-1980

| Sector | 1970 | 1975 | Annual Average Change, 1970-1975 | 1980 ^a | Annual Average Change, 1975-1980 ^b |
|--|---------|---------|---|-------------------|--|
| Mineral Extraction | 100 | 300 | +40 | 400 | +20 |
| Construction | 11,600 | 12,900 | +260 | 23,000 | +2,240 |
| Manufacturing | 22,200 | 22,700 | +100 | 26,400 | +820 |
| Transportation and Utilities | 17,300 | 16,900 | -80 | 21,900 | +1,110 |
| Trade | 54,400 | 69,300 | +2,980 | 96,300 | +6,000 |
| Wholesale | 10,600 | 13,800 | +640 | 17,300 | +780 |
| Retail | 43,800 | 55,500 | +2,340 | 79,000 | +5,220 |
| Finance, Insurance, and Real Estate | 10,400 | 13,300 | +580 | 21,300 | +1,780 |
| Services | 38,500 | 49,700 | +2,240 | 75,300 | +5,690 |
| Government | 108,900 | 127,900 | +3,800 | 139,800 | +2,640 |
| Federal | 29,500 | 26,100 | -680 | 25,800 | -70 |
| State & Local | 79,400 | 101,800 | +4,480 | 114,000 | +2,710 |
| TOTALS | 263,400 | 313,000 | +9,920 | 413,000 | +22,220 |

SOURCE: State of California Employment Development Department (EDD);
LeBlanc & Company.

^aAs of mid-1980.

^bRounded and based on 4.5 year span.

(b) 1975 to 1980. From 1975 to 1980, employment growth continued at a higher rate than before, and the distribution of growth was modified. Within all employment categories, the total increased from 313,000 in 1975 to roughly 413,000 in 1980--an increase of 32 percent, adding some 22,200 new jobs in the region each year.

Most significantly, public employment in all categories showed a declining rate of growth, then an absolute decrease in jobs, with California public agencies for the first time in many years showing a lower rate of increase than in previous periods.

Construction trades, manufacturing categories, and transportation and utilities all showed significant increases during this 1970-1980 period.

(c) Conclusions, 1970 to 1980. Overall, the Sacramento region experienced a more diversified employment pattern with growth in new employment sectors offsetting public sector declines. This diversification in the region has brought a broader range of services, an expanded employment and tax base, and a more positive general economic climate.

Table 36
EMPLOYMENT PROJECTIONS FOR THE SACRAMENTO REGION (SACRAMENTO, YOLO, & PLACER COUNTIES), 1976-1985

| Sector | 1976 | 1980 | Annual Average Change, 1976-1980 | 1985 | Annual Average Change, 1980-1985 | Percent Change, 1980-1985 |
|--|---------|---------|---|---------|---|---------------------------------|
| Agriculture, Forestry, and Fisheries | 13,300 | 13,500 | 50 | 14,100 | 120 | 4.44 |
| Mining | 400 | 500 | 25 | 500 | 0 | |
| Construction | 22,700 | 36,000 | 3,325 | 41,200 | 1,040 | 14.44 |
| Manufacturing | 25,400 | 31,500 | 1,525 | 40,100 | 1,720 | 27.30 |
| Transportation, Communication, and Utilities | 22,800 | 29,700 | 1,725 | 35,100 | 1,080 | 18.18 |
| Wholesale Trade | 14,100 | 17,100 | 750 | 19,400 | 460 | 13.45 |
| Retail Trade | 67,900 | 88,700 | 5,200 | 109,200 | 4,100 | 23.11 |
| Finance, Insurance, and Real Estate | 17,000 | 23,800 | 1,700 | 34,700 | 2,180 | 45.80 |
| Services | 121,000 | 145,100 | 6,025 | 175,600 | 6,100 | 21.02 |
| Public Administration | 59,800 | 62,500 | 675 | 65,000 | 500 | 4.00 |
| TOTALS | 364,400 | 448,400 | 21,000 | 534,900 | 17,300 | 19.29 |

SOURCE: Employment Development Department, LeBlanc & Company.

(3) Industrial Employment Outlook--1980 to 1990. In Table 36 are figures representing a synthesis of various projections for regional growth in employment sectors.*

(a) 1980 to 1985 Employment Projections. Table 36 shows projections of regional wage and salary workers, reaching a total of 534,900 by the year 1985, or increasing at an annual average of 17,300 for the five year period. This reflects a 19.3 percent, 5-year increase from the projected 1980 regional figure of 448,000.

The highest rate of growth of all employment sectors in the region is projected for finance, insurance, and real estate at 45.8 percent increase for the five year period. The second highest rate of growth occurs in the manufacturing employment sector at 27.3 percent for the five year period (from 31,500 in 1980 to 40,100 in 1985, adding an annual average of 1,720 workers to the labor force). The services employment sector is projected at an annual average of 21 percent for the period.

(4) Industrial Development Trends. Recent years have brought relative prosperity to the region's industrial development sectors, but industrial activity has had an uneven 20-year expansion history. Initial hopes for a manufacturing boom in the fifties were dashed by the failure of the Aerojet General plant and its subcontractors in the urbanized area to maintain a strong position in aerospace production.

The local manufacturing sector has a historic dependence on food processing and related production. Some plants have now closed due to crop overproduction, economics of the industry and other market changes. Activities with slow expansion rates have, to a large extent, begun to be replaced by a light industrial and industrial service sector. This coupled to a considerable growth in general, warehousing, and distributive industries has bolstered regional industrial development in the 1970s.

Now that the regional trading area (Sacramento, Yolo, and Placer counties) appears to be able to attract new, rapidly growing industries--such as the Shugart Associates, Hewlett-Packard, GTE, and Computer Service Corporation firms in Roseville and Sacramento--additional industrial development servicing these and related businesses may well be the trend of the 1980's.

(a) Industrial Land Designations--Location and Scale Characteristics. Industrial parks usually contain an interrelated mix of office, light industrial, and distribution space. There are 19 to 25 "major" industrial parks in Sacramento County alone (depending on definition), with the bulk of development potentials lying close to freeway routes and rail lines. Additional industrial potential is currently concentrated in the Roseville vicinity on the I-80 corridor, within the Highway 50 corridor in south Sacramento, and near the Sacramento Metropolitan Airport to the north (see Figure 5).

Some 33,700 acres in the county are presently designated as "planned for industrial use," with approximately 9,200 acres in some developmental stage. Of the remain-

* These projections are based upon 1976 figures prepared by the State Employment Development Department (EDD) and do not account for the recent recessionary period. Furthermore, EDD allocates certain categories of government workers to comparable private sector service classifications, thus discrepancies in data are evident. Nevertheless, the figures are useful in relative terms.

ing balance of designated land (24,500 acres), it appears that approximately 8,600 acres might be considered as highly suitable for industrial development (roughly 35 percent).

Table 37 illustrates the concentration of known industrial development potentials in the northern Sacramento region. Not all of the acreage so noted can be considered immediately developable; the preparation of some areas would take years to resolve costs of transportation, infrastructure, flood plain and other problems. Still, the inventory is of interest.

(b) Industrial Construction Trends--Regional. Recent data on the development of light industrial warehouse space are indicative of economic growth and diversification trends in the Sacramento region. Table 38 lists light industrial-warehouse construction trends in the region by location and year. As can be seen, regional activity is plainly concentrated in the Sacramento metropolitan area, including the Port of Sacramento-Yolo County developing zone.

A review of the five-year figures from Table 38 shows that construction of light industrial and warehouse space in the area has increased considerably. In 1975 a total of some 929,000 square feet of space was added; in 1979 this total had risen to 2,577,000 square feet. This growth rate of 180 percent (or 30 percent annually)

Table 37
INVENTORY OF MAJOR INDUSTRIAL DEVELOPMENT POTENTIALS,
NORTHERN SACRAMENTO REGION

| Area Location ^a | Overall Size in Acres | Developed for Indus. Use ^b | Developed for Other Uses ^c | Available for: | | Total Vacant Land Area |
|----------------------------|-----------------------------|---|---|-------------------------|--------|------------------------------|
| | | | | Industrial ^d | Other | |
| Richards Boulevard | 896.19 | 653.30 | 117.26 | 125.63 | -- | 125.63 |
| North of Florin Road | 5,230.79 | 1,982.90 | 1,043.72 | 1,307.03 | 797.13 | 2,204.17 |
| Woodlake--Arden | 623.18 | 207.68 | 187.18 | 189.74 | 38.70 | 228.24 |
| Bradshaw Area | 678.82 | 96.25 | 150.86 | 342.35 | 89.36 | 431.71 |
| Roseville Road Area | 505.83 | 116.10 | 198.54 | 41.79 | 149.40 | 191.19 |
| South of Florin Road | 548.28 | 137.64 | 30.32 | 244.42 | 135.90 | 380.32 |
| El Camino Area | 205.55 | 61.65 | 42.06 | 97.84 | 4.00 | 101.84 |
| Sunrise Area | 3,528.84 | 245.97 | 167.37 | 1,969.20 | 146.30 | 3,115.50 |
| Northgate--I-880 Area | 946.01 | 59.95 | 34.74 | 330.46 | 520.86 | 851.32 |

SOURCE: Sacramento County Office of Economic Development; LeBlanc & Company.

^aLocations described as "prime industrial areas" in recent surveys by County Office of Economic Development.

^bIncluding manufacturing, non-manufacturing, distributive, transportation, utilities, etc.

^cResidential, institutional, recreational, etc.

^dOf the total land available, only a small portion tends to be fully serviced in some cases.

shows the impact of diversification of the regional economic base and the increasing strength of the Sacramento metropolitan area as a center of business and commerce.

Table 38 also illustrates how currently troublesome financial markets and recessionary conditions have slowed light industrial space construction in the past 18 months.

The predominance of the city and county of Sacramento in regional development of light industrial space is illustrated in Table 38. However, outlying area competition, especially from Yolo County, has cut slightly into Sacramento County dominance in recent years. It appears that Placer County may soon begin to do so as well.

Nonetheless, the demand for light industrial space in the Sacramento vicinity remains strong, especially for parcels in fully serviced industrial areas.

(c) Industrial Construction Trends--Metropolitan Area. Table 39 provides a summary of the pattern of industrial-warehousing space developed within the Sacramento metropolitan area since 1975. Development zones referred to in Table 39 are mapped in Figure 17. Table 39 illustrates the significance of readily available industrial tracts in the northern (project vicinity), southeastern, and southern seg-

Table 38
CONSTRUCTION OF LIGHT INDUSTRIAL-WAREHOUSE SPACE IN SACRAMENTO REGION, 1975-1980 (IN SQUARE FEET)

| Year | City/County Sacramento ^a | Roseville ^b | Yolo County ^b | Unincorp. Placer County ^b | Total |
|------------|--|------------------------|-----------------------------|--|-----------|
| 1975 | 505,000 | N.A. | 424,000 | N.A. | 929,000 |
| 1976 | 678,000 | N.A. | 319,000 | 20,000 | 1,017,000 |
| 1977 | 1,007,000 | 67,000 | 339,000 | 70,000 | 1,483,000 |
| 1978 | 1,750,000 | 33,000 | 988,000 | 52,000 | 2,739,000 |
| 1979 | 1,602,000 | 66,000 | 812,000 | 97,000 | 2,052,000 |
| 1980 (5mo) | 354,000 | N.A. | N.A. | N.A. | N.A. |

SOURCE: LeBlanc & Company.

^aSacramento City and County Building Permits

^bEstimated from building permit valuations adjusted by price changes. Yolo includes Port of Sacramento.

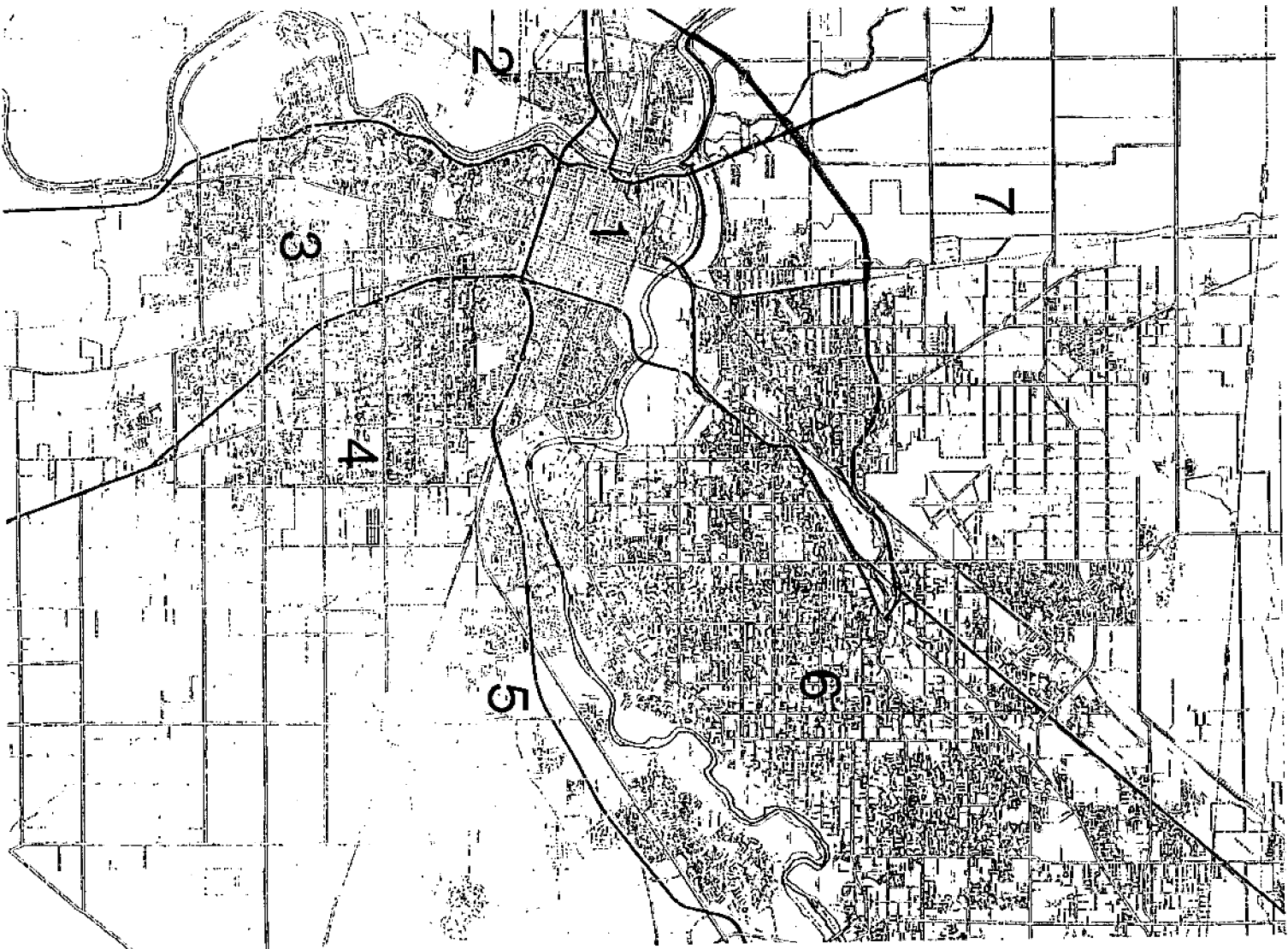


FIGURE 17
INDUSTRIAL DEVELOPMENT ZONES
NUMBERS REFER TO TABLE 39

ments of Sacramento through the 1975-1980 period. Only the downtown Sacramento zone and the northeast zone show little space development. Again, such development commonly includes a mix of office, light industrial and warehousing activities. The bulk of this activity (211 acres more or less) occurred in the 9 prime industrial areas listed in Table 37: Richards Boulevard; North of Florin; Woodlake-Arden; Bradshaw; Roseville Road; South of Florin; El Camino; Sunrise; and Northgate-880. The balance of the metropolitan industrial land absorption in that period (perhaps 67 additional acres) occurred in the following 7 areas: Elk Grove, Franklin Boulevard, C Street, North of McClellan AFB, Rio Linda, R Street, and Western Pacific. Total space developed is estimated to be only 245,000 square feet of the overall sum.

(d) Remaining Industrial Land--Metropolitan Area. Together the 9 prime areas above represent some 11,000 acres of total development potential (perhaps 50 percent now vacant) in light industrial, warehousing, distribution, food processing, light manufacturing, fabrication and construction activities. The 7 secondary areas, plus other outlying areas, represent roughly another 22,000 acres of industrial development potential (perhaps 85 percent vacant).

(5) Industrial Development Outlook. Projections of employment opportunities in sectors requiring light industrial-warehousing sites (see Table 36) indicate a continu-

Table 39
CONSTRUCTION OF LIGHT INDUSTRIAL AND WAREHOUSE SPACE IN THE METROPOLITAN AREA, 1975-1980, CITY AND COUNTY OF SACRAMENTO (IN SQUARE FEET)

| Zone ^a | 1 | 2 | 3 | 4 | 5 | 6 | 7 | |
|-------------------|---------|---------------------|-----------|-----------|---------|-----------|-----------|-----------|
| | Down- | West | South | Southeast | East | Northeast | North | Total |
| Year | town | (Port) ^c | | | | | | |
| 1975 | 22,000 | N.A. | 203,450 | 155,400 | -- | -- | 124,030 | 504,880 |
| 1976 | -- | N.A. | 201,542 | 160,594 | 147,420 | 51,550 | 117,000 | 678,106 |
| 1977 | 44,460 | N.A. | 215,250 | 358,663 | 118,960 | -- | 269,885 | 1,007,218 |
| 1978 | 25,331 | 84,000 | 258,286 | 888,850 | 172,800 | -- | 405,074 | 1,834,341 |
| 1979 | -- | 525,000 | 645,055 | 279,348 | 43,846 | -- | 634,190 | 2,127,433 |
| 1980 ^b | 18,153 | 269,000 | 7,200 | 353,821 | 173,716 | -- | 322,744 | 1,144,634 |
| Total | 109,944 | | 1,530,783 | 2,196,676 | 656,742 | 51,550 | 1,872,923 | 7,296,618 |
| Percent of | | | | | | | | |
| Total | 1.5 | 3.7 | 20.9 | 30.1 | 9.0 | 0.7 | 25.7 | 100.0 |

SOURCE: Sacramento City and County Building Departments; LeBlanc & Company.

^aNumbers correspond to areas designated on Figure 17.

^bThrough first 5 months of 1980.

^cPort of Sacramento Management Estimate.

ing, but slightly less dramatic level of light-industrial development in the Sacramento region through the next decade or two.

It is important to note that the 1978 and 1979 level of industrial development in the region and Sacramento may well have been a slight aberration, reflecting a general real estate boom following the considerably depressed 1974-75 period. A review of various available industrial-sector employment projections indicates a demand level figure somewhere between 1975 and 1979 levels of space construction.

(a) 1975 to 1980: Annual Space Absorption. Using various State of California figures for employed persons in each year since 1975, it is possible to calculate that industrial-type space requirements were on the order of some 1,500,000 square feet, rather than the average of 1,700,000 square feet that was actually produced. Thus, although a discrepancy always exists between published employment statistics and the "required" level of space in an area to house workers, some overbuilding is suspected.

(b) Projected Space Absorption Rate. Current EDD employment outlook data suggest a continuing space requirement in "industrial" activity sectors of some 1,500,000 square feet annually, or a general continuation of the development trends of the 1970s on an average annual basis (fluctuations are expected, as are changes in locational preference on the part of industrial developers).

(6) Industrial Growth Locations--Recent Shifts. With an emerging interest in different trade and some electronic manufacturing in the region, growth trends in a directional sense are being altered. The following location considerations are creating the changes:

Access. In the distributive categories, whether regional or local-serving, emphasis on the utility of the nearby highway system has dramatically increased. For some distributors, this emphasis or reliance includes rail as well; but most depend on the trucking industry for movement.

Environment. With respect to the environment of a location, many users in concert with developers appear to be seeking a more controlled setting (the "business park") as opposed to a site within one of the older industrial areas. Imagery plays a part here, as well as employee satisfaction and the availability of services.

Two principal growth areas in the region, West Sacramento and North I-880, are described below:

West Sacramento. Due largely to access and environmental advantages, the West Sacramento area (in particular the Port of Sacramento area, referred to as the "west" sector of the city in Table 39) has emerged as the most prestigious close-in industrial location for most users. This area presently has all of the advantages mentioned above, and is well connected to all points of distribution via highway, rail, and water. The Port of Sacramento's policies related to development of industrial sites are important, and apparently satisfactory to most of the developers and tenants.

North I-880. As a second choice in the metropolitan area, the North Natomas/Northgate/North Natomas area along the I-880 corridor is popular. In general terms, this area may be favorably compared with the West Sacramento area, though no public area similar to the Port is developing a major center in this corridor.

Three other areas: Highway 50 east and south, Roseville, and south Sacramento--all presently lack one or more of the characteristics that appeal in the first instances to current users.

Highway 50 East and South. The east Highway 50 corridor lacks the transportation linkage of other areas and the possibility of a more controlled development environment. In the same sense, the industrial tracts in the southerly sections of the market area lack adequate transportation linkage, land and environmental controls, and are perhaps too far from the bulk of the new housing inventory.

Roseville. The Roseville area's transportation link to the San Francisco Bay Area is less satisfactory, since it is past Sacramento itself. At the same time, however, large controllable tracts of land are found here and may be purchased direct (as by Hewlett-Packard recently), a factor that appeals to the large-area, electronics companies that wish to develop large, high quality environments in somewhat isolated settings.

(a) Locational Shifts. A review of available statistics covering land absorption in the various metropolitan industrial areas tends to show a change in direction occurring, i.e., a shift from the south and southeast to west and north sections of the urbanized area.

During 1979 to 1980, for example, relative levels of space absorbed in key areas showed that the North I-880 zone and the West Sacramento area (Port) had begun to pass, taken together, the total space absorption level for the Highway 50 area (South-Southeast zones, Highway 50, and Sunrise districts). Tables 38 and 39 provide a complete tabulation.

In total, the North I-880 and West Sacramento (Port) industrial zones accounted for some 585,000 square feet of light industrial space use for the first 5 months of 1980; the Southeast sector accounted for 353,000 square feet in that same period. Roseville accounted for only 66,000 square feet in the available 1980 figures, and Sacramento central areas some 18,000 square feet.

(b) North I-880 Outlook. With thousands of designated industrial acres remaining in the North I-880 area particularly, it is likely that considerable additional industrial potential will be realized through future industrial park development in this free-way corridor and nearby.

The movement of high-technology firms such as Hewlett-Packard may or may not fuel a corresponding development push in north Sacramento areas for complementary facilities--such a trend will remain a function of investor preference and public policies. Nevertheless, the Hewlett-Packard impetus in Roseville does tend to link up with industrial potentials in north and northwest Sacramento, providing additional potential for industrial development market support in the zone.

(7) "High-Technology" Industrial Outlook. Significant interest in the Sacramento region in recent months has been expressed by "high-technology" firms (electronics and other scientific producers). Much of this interest has resulted from severe locational problems for such firms in other urban areas.

Sacramento metropolitan area realtors and promotional organizations currently list these industrial areas as high-technology locations:

| <u>Industrial Area</u> | <u>Acres</u> | <u>Availability</u> |
|--------------------------------------|--------------|---------------------|
| Northgate/I-880 Park (North I-880) | 360 | Spring 1981 |
| Placer Center | 140 | Early 1981 |
| Port of Sacramento (West Sacramento) | 100 | Summer 1981 |
| Mayhew Tech Center | 80 | Spring 1981 |
| Bradshaw Tech Park | 100 | Spring 1981 |
| Prospect Business Park | 100 | Spring 1981 |

There are presently 30 to 40 operating companies in the region that might be allied with high-technology research, development, and production. The ultimate acceptance by Placer County of the Hewlett-Packard complex and related proposals in Roseville will govern to a large extent Sacramento area growth in this industrial sector within the decade.

The competitiveness of the Sacramento and Roseville areas for "high-technology" development will be largely determined by the relative availability of larger sites designated within well-serviced areas of the region to provide "campus" settings for the large, expansion-oriented firms.

b. Office Growth Trends and Outlook--Sacramento Region

(1) Background. Economic growth since 1950 in Sacramento has supported a steady increase in office space development. Between 1950 and 1970, much of this growth was connected directly with public employment. A large component of private office-based employment (managerial, technical, and clerical) has supported significant office space expansion since 1970. It is estimated by local realty interests that some 9.5 to 10.0 million square feet of office space exists in the urbanized Sacramento area. Roughly 7.0 million square feet have been developed since 1970, considerably more than half the total inventory.

(2) Office-Based Employment Outlook--1980 to 1990. Although government may curtail its growth in the decade, private activity supporting office space development is expected to be considerable. Most regional agencies now project that some 600 to 1,000 new jobs in finance, insurance, and real estate will be added each year to 1990; another 1,000 annually in business; perhaps 500 to 800 each year in transportation and utilities, and around 1,000 to 1,500 in wholesale and retail trade.

Not all of this employment will be assigned to office space. The portion occupying office space would probably be on the order of 2,500 to 3,000 jobs added each year, typically measured. This would represent an office space demand for 600,000 to 750,000 square feet annually in the region.

(3) Recent Office Development Trends. Annual development of new office space in the region increased between 1970 and 1980 from nearly 600,000 to 700,000 square feet. Since 1980, roughly 1,000,000 square feet per year has been developed, counting major projects now about to come on market. Absorption of regional office space on an overall basis has kept at a reasonable pace with development to date.

(a) Locations. The most recent surge in floor area has resulted from construction of larger buildings in central Sacramento. However, equally significant activity has emerged since the mid-1970s in outlying office centers; the most notable are Point West near Cal Expo; Campus Commons east of the Sacramento CBD; Howe Avenue, Arden-Arcade, and some smaller concentrations.

The present generalized inventory of space by area is:

| <u>Location</u> | <u>No. of Tenants</u> | <u>Million Sq. Ft. of Floor Area</u> | <u>Ave. Annual Absorption (sq.ft.)</u> |
|------------------|---------------------------|--|--|
| Point West/ | | | |
| Campus Commons | 570 | 2.5 | 180,000 |
| Sacramento CBD | 600 | 2.6 | 165,000 |
| South Sacto | 100 | 0.7 | 44,000 |
| Watt Avenue | 400 | 1.5 | 30,000 |
| East Sacto | 70 | 0.7 | 30,000 |
| Rancho Cordova | 30 | 0.5 | 9,000 |
| West Sacto/Davis | 30 | 0.1 | 9,000 |
| Midtown | 240 | 1.3 | 7,800 |
| North Sacto | 20 | 0.1 | 5,000 |
| Carmichael | 50 | 0.1 | 3,500 |
| Power Inn | 30 | 0.1 | 1,500 |
| Others | 130 | 0.3 | 23,000 |
| TOTALS | 2,270 | 10.5 | 507,800 |

(b) Tenants. Tenant distribution is not surprising, given Sacramento's economic makeup. Government agencies represent more than one-third of all office footage occupied. Financial and business services appear to account for another third, and corporations, professional firms, and other groups the remainder.

(c) Vacancy Rates. Vacancy in central Sacramento and larger buildings (class A space), in the CBD and Capitol zones is presently estimated at less than 2 percent (Coldwell Banker and Company).

(4) Office Development Outlook. New development currently proposed for the central Sacramento/CBD/State Capitol zone currently totals nearly 2.0 million square feet. Twelve major projects make up the bulk of this total. Another 2.5 to 3.0 million square feet of office space is proposed in 18 locations outside the central city area, including existing centers such as Point West, Howe, and Watt Avenues, and other "business park" locations, such as Bradshaw and the Carma/Highway 50 project.

This level of office space development planned for occupancy within the next few years, would add some 4.0 to 5.0 million square feet of new office space to the region's key locations before 1985.

(a) Balance between Supply and Demand. If absorption continued at the pace of the 1979-81 period (one million square feet per year), the inventory described above would probably represent the five-year demand through 1985, and equilibrium would be in effect again. If absorption slows, those projects not in established office locations may find the going rougher.

(b) Public Sector Declines. Given the financial limitations faced by federal, state and local public agencies, it is likely that the significance of the public sector as a major component of demand will continue to decline through the 1980s. Some public sector boost for local office projects can still be anticipated, however, as various public agencies normally outgrow older, obsolete space or otherwise upgrade to new privately-leased quarters.

(c) Changing Tenant Needs. Tenant patterns in new space have changed slightly in the Sacramento area. Realtors leasing space locally indicate that the average size of private tenant leases is increasing. In certain areas it has risen from the 2,000-square-foot level towards 4,000. The rate of inquiries from firms requiring larger amounts of space is also reported to be increasing.

2. IMPACTS

This impact analysis considers the economic appropriateness of the proposed actions in light of conditions and trends described above, and describes potential project effects on regional office space markets, including the central district.

a. Feasibility of the Proposed Action

In a purely competitive, real estate sense, the proposed development of high amenity suburban office space in a South Natomas business park environment appears feasible in light of the following existing setting findings:

- the projects would be consistent with the regional trend toward employment diversification into new sectors;
- the region appears to be able to attract new, rapidly growing industries;
- recent regional industrial growth trends show a gradual increase in Sacramento Metropolitan area strength as the region's business and commercial center; and
- significant interest in the Sacramento region has been demonstrated in recent months by large-space tenants and "high-technology" industries seeking large, well-serviced sites near good housing opportunities.

b. Need for the Proposed Action

In a purely economic sense, the following regional setting considerations described below tend to justify the project:

- There is a growing need to encourage diversification of the regional economic base. The area has been particularly dependent on government jobs (over one-third of the employment base and office space inventory). Recent reductions in growth rates and actual declines in overall public sector employment (federal, state and local) suggest a worsening employment scenario unless the employment base can be broadened. Trends toward diversification are already evident.
- The projects are designed to attract new employment sectors to the region--corporate headquarters, high-technology tenants, large information processing firms--which would broaden the employment base and help offset public sector declines.

c. Business Park Suitability of South Natomas Sites

The proposed Natomas Eastside and Gateway Centre plan changes raise questions related to the suitability of the South Natomas west side as a location for non-residential uses. Existing economic setting findings herein tend to support use of the site as a major employment center, as explained below.

(a) Local Attraction Factors. In comparison to other Sacramento area locations, the site has the advantages described below:

- A high demand for high-amenity suburban office space in the Sacramento area. Existing similar developments, Point West and Campus Commons, have reached their build-out levels.
- The projects would be in immediate proximity to a high concentration of existing and planned housing opportunities.
- All office space cannot and should not be concentrated in the CBD. Many types of offices, such as corporate headquarters of expansion-oriented firms, and major information processing activities such as insurance companies, seek suburban office space locations to meet their periodic onsite expansion needs, their imagery requirements (high freeway visibility, etc.) and most importantly, their special employment needs.

Such administration-intensive, data processing businesses rely on a large secondary labor force (secondary wage earners) made up largely of women. Experience of employers has found that it is much easier to attract such workers when located near residential areas. Child care needs, the time and cost of travel, and parking constraints disadvantage the downtown's ability to attract secondary wage earners.

- The sites are large-scale and highly-buildable.
- The sites are perceived as having freeway access and proximity to the downtown and metropolitan airport.
- The projects would provide a controlled environment where internal uses could be of a compatible and attractive nature.

- The sites are well situated to take advantage of a large potential local labor force, one that is not fully employed, and one that is without other significant job opportunities in the neighborhood vicinity.

The above considerations indicate that location of the projects at South Natomas presents a good real estate prospect. On the other hand, as noted by one of the applicants, market uncertainty might be experienced in the early development and occupancy stages due to an initial lack of project "identity" as a non-residential area.

d. Project Effects on Regional Industrial-Commercial Development

If the proposed scale of office-intensive business park development is accommodated within South Natomas, the following local market effects might result:

- A decline in the rate of office development (but not the overall level) in the CBD/Capitol zones;
- Less pressure for similar office-intensive projects in the North Natomas - Airport areas, at least within the decade; and
- Less diversification (i.e. less emphasis on offices) in other competing projects, especially those with announced intentions to integrate light industrial, research and development, and "business park" uses in locations along Highway 50 or to the east closer to Placer County.

e. Project Effects on Existing Sacramento Office Centers

The "equilibrium" projections described earlier for the regional office market (supply in tune with demand at reasonable vacancy levels) may be deceiving. Rapid shifts in a region's attractiveness to key industries can change market conditions very quickly.

If the amount of office space projected in the Natomas Eastside and Gateway Centre proposals is actually developed, the project could be competitive with the central area office market as well as other suburban office parks. It would be highly speculative to predict how this competition would effect expansion, absorption and rental rates in these other areas. However, in other similar space markets, adverse effects have occurred.

(1) Suburban Effects. The primary market effect of the South Natomas office projects would probably be on other suburban office parks in the region. The projects' proximity to downtown and the airport, their perceived freeway access, and the high-quality image created by their large-scale business park settings, together would make the proposals very competitive in the region's suburban office market. The projects' success would decrease the potential for development or expansion of other suburban office projects both within and outside the city of Sacramento.

The degree of this market impact would depend primarily on build-out and absorption rate of the projects in relation to the metropolitan area market. Full absorption of 3.35 million square feet of office space in a 7-year period, as proposed,

would clearly be a major force in a market where the total metropolitan area absorption rate is now 800,000 to 1,000,000 square feet per year.

(2) CBD Effects. Potentials for project effects on downtown are less clear than impacts on other suburban office developments. A significant portion of anticipated CBD development would be unsuitable for other than downtown locations. Offices for professionals, (lawyers, etc.), business services oriented to downtown activities, and tenants who require a location convenient to the state governmental center would locate downtown in any case, and the market would respond to such a need. However, development of a 3.35 million square foot office park in proximity to the CBD could draw tenants with marginal downtown needs who are attracted by the improved visibility, parking and access that a close-in suburban office park appears to offer.

It is expected that some firms would move to a South Natomas business park from downtown and other suburban office areas; the net effect of this shift on the CBD would be determined by the number of relocating firms replaced by normal CBD growth (i.e., the affect on CBD vacancy rates).

Absorption of project office space in 7 to 10 years as proposed would require capturing 45 to 60 percent of the projected regional office market, a portion that would noticeably affect demand for new downtown development. Build-out in 8 to 10 years and absorption over 9 to 12 years would represent roughly a 28 to 45 percent market capture rate (regional). This latter penetration rate for a project of the proposed size and quality is more reasonable and would be less likely to significantly retard demand for downtown space.

The competitiveness of the CBD may be better protected from project market impacts than would other Sacramento area office concentrations, by the considerable amount of new downtown space already added. Nearly 2.0 million square feet is now on line for occupancy within the next 4 to 5 years. This additional floor area may be approaching the comfortable limits of CBD capacity for absorption of office uses (planning problems and traffic impacts controlling).

Thus the CBD office space market may already be established and comfortably occupied to an acceptable degree by the time any substantial activity occurs at Natomas Eastside or Gateway Centre. The main effect of any "overbuilding" in the Natomas vicinity on the CBD would occur at a later date, if relocation of tenants became an issue.

3. MITIGATION MEASURES

a. Protection of Regional Office Space Market Conditions. Consider reducing the potential for adverse office market impacts on the CBD and other regional office space markets by phasing Natomas Eastside/Gateway Centre construction over a 10-year rather than an 7-year buildout period. Such a measure would reduce annual project penetration into projected regional office-space markets to 30 or 40 percent, as compared to 40 or 50 percent under the proposed plans.*

I. SOILS AND SEISMICITY

I. SETTING

a. Topography

The project sites are situated on a broad, flat plain of recent alluvium. The plain is located north of the confluence of the American river with the Sacramento river and is primarily in agricultural use. Natural elevations range between 10 and 20 feet. Man-made structures, such as levees and freeway overpasses, provide the only distinct relief. Primary drainage from the sites to the Sacramento River is provided by the Natomas Main Drainage Canal.

b. Soil Conditions

Test borings at the sites revealed that surface soil consists of a 20-foot-thick layer of unconsolidated soft-to-medium stiff sandy silt and clay, with low-to-moderate plasticity characteristics.

Seasonal groundwater levels, which in combination with soil plasticity characteristics contribute to expansion problems, can peak to within 3 to 5 feet of the ground surface. The primary engineering concern regarding such soils as cited in the SNCP EIR are their low-to-moderate potential for expansion and contraction during changes in moisture content of clays. These expansion or shrink-swell characteristics can damage structural foundations.

c. Seismicity

(1) Ground Motion. The only known South Natomas geologic hazard addressed in the SNCP EIR is the susceptibility of urban structures to seismic ground motion. Although surface rupture is considered unlikely since no known active faults are located within project boundaries, the sites have a high potential for major seismic damage due to adjacent regional fault systems.

(2) Liquefaction. Geologic investigations of the sites revealed that the unconsolidated alluvium underlying the site contains zones of loose saturated sand. Such fine-grained materials are not highly susceptible to either densification or liquefaction; however, little information has been developed on onsite subsurface materials. The site is susceptible to high groundwater levels. Thus, site subsoils may be susceptible to some liquefaction during strong seismic shaking.

2. IMPACTS

a. Soils

(1) Shrink-Swell. The site's low-to-moderately expansive clay surface on which all structures and roads would be founded could cause slight differential movement of foundations and cracking of pavements and foundations with seasonal changes in moisture content. The larger building, foundation, and pavement masses associated with office/commercial development (see Figures 3 and 4) would be more sensitive to shrink-swell damage than SNCP residential improvements.

(2) Structural Fills. Inclusion of surface vegetation and organic matter from crop residuals in structural fills could lead to settlement resulting in damage to structures and related infrastructure improvements.

(3) Consolidation. Consolidation and resulting settlement of the soft near-surface silt and clay soils under sustained high foundation loads could cause structural damage.

b. Seismicity

(1) Ground Motion. The project site is located in an area of relatively high seismicity. It is likely that the site will be subjected to strong ground shaking produced by earthquakes on nearby faults. Potential impacts that are associated with high groundwater levels and strong ground motion include damage to project buildings and related infrastructures due to groundshaking, lateral spreading, soil compaction, lurching, and liquefaction.

If strong shaking occurs during flood flow in the drainage canal, there is some possibility of localized failure of channel banks.

(2) Liquefaction. There is no present information concerning subsurface materials below depths of about 20 feet. It is possible that lenses of loose granular material, susceptible to liquefaction or densification, are present within the alluvium beneath the site.

c. Construction Period Impacts

Dust (aeolian erosion) would be generated by site preparation and other construction activities on dry surface soils.

3. MITIGATION MEASURES

a. Soils

(1) Surface vegetation should be stripped from structural fill areas and disposed, where practical, in on-site landscaping areas.

(2) There appear to be no hazardous or unavoidable soil conditions that would preclude any of the proposed land uses. Development on expansion-prone soils is not

unusual and can be mitigated by routine engineering procedures. Standard design level geotechnical engineering services should be provided to guide foundation design, grading, and construction for each project feature.

b. Seismicity

(1) A design level geotechnical study should be made to evaluate any liquefaction potential for each project structure.

(2) As recommended in the SNCP EIR, provisions of the local building code should be followed regarding design of structural earthquake resistance.

c. Construction Period

(1) Sprinkling and other construction expedients should be used to control dust generation.

J. DRAINAGE AND WATER QUALITY

I. SETTING

a. Drainage and Related Improvements

The project area is within the Natomas Area Storm and Sewer Assessment District. District Sump No. 130 and San Juan Pump Station were constructed by the city in 1974 using funds from the district. The pump station, located on the east bank of Natomas Main Drainage Canal south of El Camino Avenue, consists of three electric motor-driven pumps with a total design capacity of 142 cubic feet per second (cfs). The pump station was designed to drain an area of 481 acres with a peak runoff of 0.30 cfs per acre.

The pumps discharge storm runoff to the Natomas Main Drainage Canal, which is operated and maintained by Reclamation District 1000. Flows are pumped at the south end of the canal to the Sacramento River. The Natomas Main Drainage Canal has a capacity of 1,967 cfs. Pumping Plants 1A and 1B have a combined capacity of 871 cfs.

b. Existing Flood Potential

The 1978 Flood Insurance Study for the City of Sacramento concluded that a 100-year flood would be contained within the Main Canal and Sacramento River levees. Therefore, flooding of the project area from off-site flows is not expected to occur.

c. Subsurface Conditions

Seepage of water under the Sacramento levee in the south part of the project area is a problem described in the SNCP EIR. In addition, seasonal groundwater levels may peak to within 3 to 5 feet of the ground surface.

d. Surface Water Quality

The project area is currently in extensive agricultural production. The quality of runoff from this area is significantly affected by large volumes of suspended solids caused by erosion of the disturbed soils. Runoff from these agricultural lands also typically contains nutrient, pesticide and herbicide residues in small amounts.

2. IMPACTS

a. Project Impacts on Existing Drainage Improvements

(1) Runoff Increase. The proposed change in project site land use from residential to office-commercial would result in a runoff increase of 50 percent due to associated increases in impervious surfaces, according to city public works representatives.¹ This increase, combined with the installation of an underground storm water drainage system, would result in a significant increase in peak runoff from the sites.

Based on the city's design criteria, systems for commercial and industrial land uses should be designed for a peak runoff flow of 0.3 cfs per acre, while stormwater systems for residential development should be designed for 0.2 cfs per acre.² A comparison of design runoff peak flows from the project sites is shown on Table 40. The proposed project would generate approximately 15 cfs (23-percent increase) more runoff during peak flows than development under the SNCP.

Table 40
COMPARISON OF EXPECTED PEAK RUNOFF FLOWS FROM PROJECT AREA

| <u>Land Use</u> | <u>Community Plan</u> | | <u>Proposed Project</u> | |
|--|-----------------------|------------------------|-------------------------|------------------------|
| | <u>Acres</u> | <u>Peak Runoff</u> | <u>Acres</u> | <u>Peak Runoff</u> |
| Single Family Residential ^a | 159 | 32 cfs | -- | -- |
| Multi Family Residential ^b | 25 | 8 cfs | 21 | 6 cfs |
| Commercial/Industrial ^b | 85 | 26 cfs | 284 | 75 cfs |
| Total | 269 | 66 cfs | 269 | 81 cfs |

SOURCE: CH2M HILL.

^aPeak runoff at 0.2 cfs/acre.

^bPeak runoff at 0.3 cfs/acre.

(2) Pump Station. The project sites would be drained to the existing Sump No. 130 pump station. City of Sacramento Engineering Department staff have indicated that the existing pump station has sufficient capacity to drain the project sites under the proposed level of development.³

The pump station would probably be operated more often due to greater volumes of runoff, increasing operating and maintenance costs, and reducing the service life of the pump station.

(3) Discharge Accommodation. Reclamation District 1000 fees for providing ultimate disposal of runoff have been paid previously by the city. Future facilities of the District have been planned to accommodate the existing pumping plant discharge.

b. Impacts Related to Sub-Surface Hydrologic Conditions

- (1) High groundwater levels could hamper underground utility construction.
- (2) High groundwater levels could flood unprotected basements.

c. Impacts on Local Surface Water Quality

Generally, runoff from industrial and commercial land uses contains greater quantities of pollutants than does runoff from residential and agricultural areas due largely to paved areas which gather petroleum wastes and other pollutants. Table 41 is a comparison of estimated pollutant loadings from the project area based on SNCP land uses versus the proposed projects.

Table 41
COMPARISON OF EXPECTED POLLUTANT LOADINGS OF URBAN RUNOFF FROM
PROJECT AREA

| Proposed Land Use | Community Plan | | Proposed Project | |
|--|----------------|--|------------------|--|
| | Acres | Total (Suspended Solids) Pollutant Loading | Acres | Total Suspended Solids Pollutant Loading |
| Single Family Residential ¹ | 159 | 19,100 lbs/yr | -- | -- |
| Multi-Family Residential ² | 25 | 43,000 lbs/yr | 21 | 36,000 lbs/yr |
| Commercial/Industrial ³ | 85 | 18,700 lbs/yr | 248 | 54,600 lbs/yr |
| Total | 269 | 42,100 lbs/yr | 269 | 58,200 lbs/yr |

SOURCE: CH2M HILL.

¹Emission rate of 120 lbs/acre/yr.

²Emission rate of 170 lbs/acre/yr.

³Emission rate of 220 lbs/acre/yr.

Note: All emission rates from unpublished data of Sacramento Regional County Sanitation District.

The proposed projects are expected to increase the total annual suspended solids pollutant loading by 16,100 lbs, a 38 percent increase over site buildout under current SNCP policies.

These pollutant loadings are not considered significant in terms of detrimental water quality impacts on the Sacramento River. The present total suspended solid loading in the Sacramento River upstream from the project area is estimated to be 2.32 billion pounds per year.⁴

3. MITIGATION MEASURES

a. Storm Water Runoff Improvements

(1) Project Drainage Facilities. Drainage facilities have been or would be constructed to provide necessary structures to mitigate impacts caused by project runoff increases. Reclamation District 1000 maintains the main drainage canal and would require a 35-foot wide easement along the top of slope of the channel for maintenance.

The district has also indicated that the project developers would be required to pay a pro-rata share of canal silt removal costs.

b. Sub-Surface Hydrologic Impacts

(1) Mitigation measures for seepage problems, as described in the SNCP EIR, should be incorporated into engineered drainage plans. These mitigation measures should include:

- Proper grading of the site to facilitate drainage;
- Proper design of foundation structural details; and
- Installation of subsurface tile drainage systems.

(2) Consideration of drainage and hydrostatic uplift should be included in the designs of project area basements and below-ground structures.

c. Water Quality Measures

(1) Runoff. Pollutant loading increases from project storm water runoff can be minimized through maintenance practices such as street sweeping, catch basin cleaning and pavement repair. Sweeping and cleaning activities should be done on a regular basis with particular emphasis on late summer and fall periods, to reduce surface material loadings that can be washed off during the first rainfall event of the winter season. Assuming a once-a-week sweeping, the expected total solids loading reduction could be up to 40 percent.⁵

Because city street sweeping would be limited to dedicated streets, sweeping of project private drives and parking areas would be the responsibility of the applicants. The applicants should propose for city review and approval a realistic, long-term program for cleaning and maintaining private, paved areas.

4. REFERENCES

¹ Tom Betts, District Manager, Reclamation District 1000.

² Reclamation District 1000 Drainage Study, December 1979, Langenour and Meikle, Civil Engineers, Woodland, California.

³Betts, op.cit.

⁴1978 Needs Survey - Cost Methodology for Control or Combined Sewer Overflow and Stormwater Discharges, EPA 430/9-79-003, February 1979.

⁵Demonstration of Nonpoint Pollution Abatement Through Improved Street Cleaning Practices, EPA 600/2-79-161, August 1979.

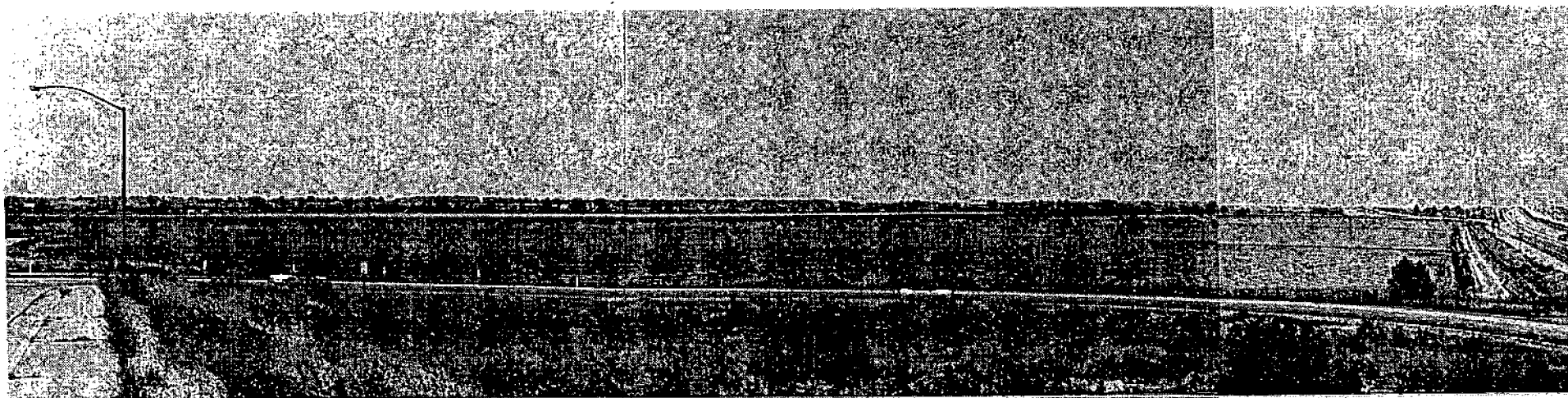


PHOTO 6



PHOTO 7

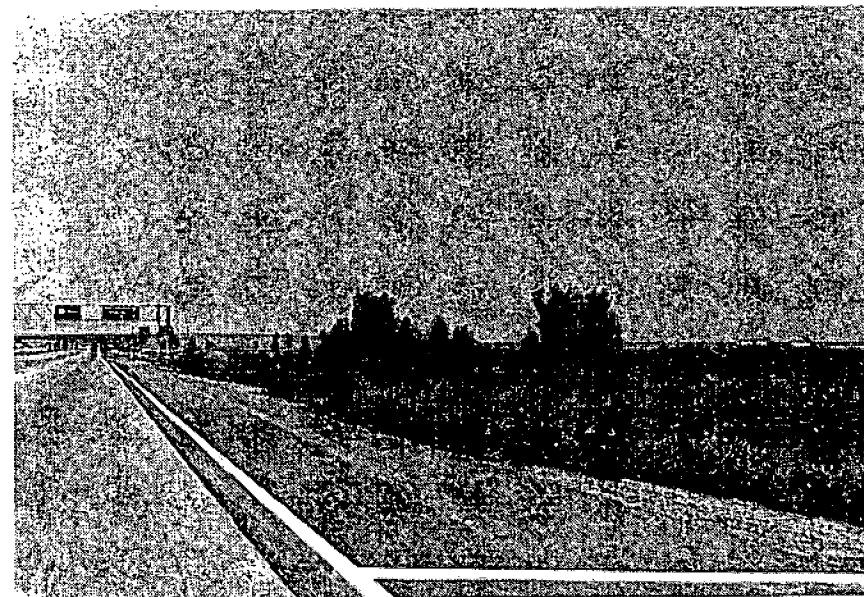


PHOTO 8

- require all proposed development along major entryways into the city to undergo special architectural review--the role of the Architectural Advisory Committee should be emphasized for this process; and
- coordinate with the county in developing common urban design standards which will lead to consistent treatment of bordering areas, particularly along entrances to the city.

(2) SNCP Policies. Policies concerning landscaping and beautification are found throughout the SNCP. In addition to aforementioned 1-5 treatments, the plan calls for a 50-foot-wide open space parkway corridor along both sides of the Natomas Main Drainage Canal (see Figure 8), with emphasis on preserving natural vegetation.

2. IMPACTS

a. Effects on Site and Vicinity

(1) Changes in Perception and Image. The proposed action would change the character of project vicinity buildout from a homogeneous, residential-scale suburban landscape, and a visual extension of the suburban neighborhood east of I-5, to that of a mixed-scale office center/residential concentration distinctly different in character from the east-of-I-5 area.

(a) SNCP Scenario. Under SNCP buildout, a residential texture would dominate the landscape. Clusters of community commercial (medium-scale) buildings and the mature trees would create small visual focal points. The west side would appear as an extension of the similar residential-scale landscape east of I-5.

(b) Project Scenario. With the proposed office parks, east-side and remaining west-side residential landscapes (Figure 9) would be distinctly separated by high-bulk office building areas. Due to contrasts in building scales, South Natomas would be perceived as 3 distinct areas as a result of the projects--the east-side residential neighborhood, the high-contrast central office area, and the west-side residential neighborhood--rather than as one homogeneous community bisected by a freeway.

(2) Visual Compatibility--Natomas Eastside. Residential uses west of Natomas Eastside would be protected from significant visual impacts due to the buffering effect of the drainage channel and associated parkway. Also, the townhouse component of the project would provide additional buffering and an appropriate scale transition between the parkway and the office structures.

Visual experiences in the canal parkway could be adversely affected by proposed Natomas Eastside residential and commercial development. The degree of impact would be determined by the design of Natomas Eastside structures (setbacks, scale, height, bulk, color, architectural detailing), and by parkway landscape treatments.

(3) Visual Compatibility--Gateway Center. Future Natomas Oaks PUD residential development immediately west of Gateway Centre would be subject to potential visual incompatibility with the proposed projects. Residential development along Natomas Oaks Drive, opposite the Gateway Centre site may have direct views into

the office areas and/or be exposed to view from upper stories of the nearest office buildings (loss of privacy).

b. Effects on Surrounding Travel Routes.

(1) Interstate-5. The projects would have a highly noticeable visual impact on the I-5 corridor between I-880 and the river. Changes in southbound views would be particularly pronounced. Project impacts, as compared to SNCP effects, would be as follows:

(a) SNCP Scenario. Under the SNCP buildout scenario, the visual experience along I-5 between I-880 and the river would be dominated by the small-scale landscaped highway corridor itself. Intermediate views would be contained by noise walls. The corridor would appear balanced. The American River, distinguished by its tree-lined banks (Photos 5-7), would be seen as the clear separator between the central area industrial-commercial landscape and the suburban residential fringe.

(b) Project Scenario. With the projects, the segment would be perceived as a northern extension of the existing commercial-industrial landscape across the river, diffusing the threshold effect of the river. The river would simply divide new from existing commerce. The tree line which distinguishes the river could be largely screened from view by project structures, particularly the 6-story elements.

The balanced entry corridor effect of the current plan (same plantings and noise wall backdrop on both sides; no large-bulk structures beyond the walls) would be replaced by a less defined, more unbalanced corridor (same plantings on each side perhaps, but noise wall would be unnecessary and inappropriate for the office side; and opposing building scales would be distinctly different). Distinct differences between the scale of the proposed projects and that of designated residential development on the opposite side of the route, plus differences between the two projects themselves, would tend to weaken the entranceway effect.

The southbound freeway view along the site frontages would be dominated by a corporate office complex, probably separated from the freeway by landscaped berms rather than an undulating noise wall. The berms and other landscaping features would accent views of structures rather than block them.

(2) I-880. Similar to I-5, desires for high visibility and a corporate image would probably result in use of landscaped berms or no barriers, in lieu of noise walls. Views into the site would be open to the extent allowed by such treatments. The freeway would still be perceived as the northern edge of Sacramento urbanization.

The relatively shallow office building setbacks shown on Figure 3, in combination with proposed building heights up to 6 stories, could create an impression of visual intrusion on the freeway.

(3) Garden Highway. Most of the mature trees that contribute to the visual experience of this highway would remain protected by the SNCP Natomas Oaks park designation. However, the preliminary Gateway Centre development scheme (Figure 4) indicates that more of the large trees east of Natomas Oaks Drive on the Gateway Centre site could be lost with the proposed land use changes.

The perception of entering a riverside residential area (Natomas Oaks, Swallows Nest, etc.) and related neighborhood identity values would be reduced by the projects. The drop in elevation from the route to the project site, in combination with proposed landscaping along the Gateway Centre frontage, could buffer this project impact, however. The degree of offset would be determined by (a) roadside landscape design coordination between Gateway Centre and "downstream" residential projects (Natomas Oaks, etc.), (b) project sign design, (c) project parking area treatments, (d) design characteristics of Gateway Centre structures (roadside height, mass, architectural treatments, building separation, etc.); and (e) project outdoor lighting treatments.

(4) West El Camino Avenue. The roadside landscape through the Natomas Eastside site would change from a mixed-scale community-commercial/freeway-commercial/high density residential pattern under the SNCP, to a more uniform streetscape. Natomas Eastside features, including common landscape and architectural design on both sides of the route, could represent significant visual advantages.

(5) Elevated Interchanges. In the case of all these routes, elevated interchanges would offer overviews of some project rooftops. Unsightly mechanical equipment could detract from these overviews.

c. Relationship to Other Design Policies

(1) General Urban Design Policies. Relevant city Open Space and Community Design element policies generally address visual treatments along major travel routes, with emphasis on important entryways. Apparent differences between Natomas Eastside and Gateway Centre roadside landscaping treatments (see Figures 3 and 4), particularly along I-5, indicate a need for a more coordinated approach to corridor landscape treatments, as called for in the general plan elements.

(2) SNCP Policies. Natomas Eastside preliminary plans do not detail proposed landscape treatments along the drainage canal. Presumably, SNCP policies such as an emphasis on natural vegetation, provisions of a bike path, etc., would be incorporated in subsequent, more detailed design submittals by the applicant.

d. Onsite Design Considerations

(1) General. The character of both projects would be dominated by monolithic, low-rise building forms in the contemporary business park vernacular.

Differences in building footprints between the two projects, plus the transmission line corridor separating them, would probably result in visual perception of the projects as two, or perhaps three, business park projects, rather than one integrated development. Perception of a third project would result from distinct area definitions created by West El Camino Avenue and the transmission line corridor. The two alignments will tend to visually separate the southernmost segment of Natomas Eastside into one visual unit.

(2) Natomas Eastside. The juxtaposition of residential and business park components in this project could result in the following design impacts:

- An incongruous transition in scale between residential and office components;
- Visual conflicts, loss of privacy, and outdoor lighting conflicts for the northernmost townhouses due to minimal separation from the adjacent office structure.

The proposed site plan for the residential area could result in the following design impacts:

- the residential area would appear isolated and would not be readily identified as an integral part of the South Natomas residential community west of the canal.
- Natomas Oaks Drive access to the office park could create traffic and related noise nuisances for the nearest townhouses.
- The townhouse cluster would be enhanced by its location along the drainage channel parkway; and
- The limited number of breaks in the tight row of townhouses along the canal parkway would maximize direct frontage to the benefit of the nearest units, but would create a visual barrier blocking perception of the parkway from other project units..

Views from many office buildings would be directly onto potentially unsightly parking areas. Office areas on the north and eastern sides of the site would have potentially distracting overviews of the I-880 and I-5 freeways. The extent of such impacts would be affected by parking area and freeway frontage landscaping details.

Lake and Other Open Space Aspects. The proposed Natomas Eastside lake would provide a pleasing form and distinct identity element for the surrounding office cluster, and could provide an employee rest area.

Other common open space and pedestrian features of the project are unclear at this preliminary stage.

Fire Station. Location of the fire station on Natomas Oaks Drive opposite the power substation represents an optimum land use relationship in terms of visual compatibility.

(3) Gateway Centre. Office buildings along the east side of the project would have potentially distracting views of I-5. Many office structures would also have immediate views of parking areas. The extent of both impacts would be affected by highway and parking area landscaping details.

Common open space and pedestrian features of the project have not been clearly detailed at this preliminary planning stage.

(4) Exterior Lighting Impacts. Outdoor lighting would be required for parking areas, pedestrian pathways, and building entrances. The principal purposes would be security and safety. A secondary purpose--accent of structures and landscaping--may also be served.

The most efficient means of achieving needed levels of light in most circumstances is use of a few high sources which produce even lighting with minimal shadow. The fewer the sources and the higher the mounting, the greater the efficiency. Environmental considerations, on the other hand, suggest variations on this solution. These considerations include:

- Protection of offices, adjacent residential uses, and travel routes from bright light, glare, and noise (hum from ballasted light sources);
- Protection of trees from interference from light fixtures (extended exposure to illumination can have adverse effects on some plants); and
- Desires for special visual effects--for example, to emphasize particular areas or architectural features, and to minimize visual impacts of others (service areas, etc.).

3. MITIGATION MEASURES

a. Visual Compatibility with Surrounding Uses

- (1) Relate height and bulk characteristics of structures along the west edge of Gateway Centre to the scale of future, nearby residential development.
- (2) Place higher structures in both projects at locations where height will achieve visual interest consistent with nearby residential compatibility considerations.
- (3) The height of project structures should taper down to the edge of the project boundaries. Highest structures should be clustered towards the center of the two projects, buffered from surrounding land uses and local roads by lower structures.
- (4) Reduce visual and noise conflicts between Natomas Oaks PUD residential uses along Natomas Oaks Drive and Gateway Centre office-commercial activities by orienting adjacent Natomas Oaks units internally (away from Gateway Centre), and by providing a landscaped buffer strip along the west side of Natomas Oaks Drive, similar to the proposed Gateway Centre treatment. (This measure would require changes in the adopted PUD.)

b. Parkway (Natomas Eastside)

- (1) Coordinate landscape designs on both sides of the drainage canal to provide a significant unifying element and the appearance of a continuous, public commons.
- (2) Limit frontage building heights to 35 feet to reduce visual intrusion.

c. I-5 Corridor

- (1) Create a distinct visual corridor by coordinating landscape treatments between the two projects and with the opposite side of the freeway. Treatment should emphasize reduction of the visual imbalance between residential and office-commercial structures. Use of the same landscaped berm design on both sides of the freeway

would serve to unify the corridor; abate visual, noise, and air quality impacts; soften the impact of larger-bulk office park structures; and provide visual accent to the office parks.

(2) Provide a transition in building heights, with higher-rise elements buffered from I-5 by lower-rise elements.

(3) Avoid use of highly reflective glazing and other materials on business park elevations exposed to the freeway.

(4) Incorporate the same or similar roadside design control provisions--building height, bulk, orientation, forms, colors, materials; landscape treatments; exterior lighting techniques; etc.--in conditional use permits and in "conditions, covenants, and regulations" (if applicable) for both projects.

d. I-880

(1) Increase building setbacks and limit heights at the freeway edge to minimize visual intrusion. Buildings might be effectively separated from the freeway edge by rear parking areas, without losing advantages of high visibility. Proper landscape treatment of such parking areas could maintain or enhance the "high-quality" image from the freeway.

e. Garden Highway

(1) Protect mature roadside trees against removal or harm by project activities (see mitigation details under VEGETATION AND WILDLIFE).

(2) Coordinate median strip* and frontage landscaping along the route with future residential development to the west, enabling the route to function as a unifying visual element.

f. Rooftop Mechanical Equipment

At areas where project rooftops would be exposed to roadside views, rooftop architectural screens should be required to provide effective visual buffering. Mechanical equipment should also be painted to blend with the building roof color to minimize visual impacts.

g. Exterior Lighting

Impact mitigation techniques should include use of: low mounting heights, closely spaced luminaires, and light refractors, reflectors, or diffusers; reduction in reflective surfaces; and location of ballasting equipment in a noise-abating enclosure. Landscape design should be coordinated with lighting design.

* Garden Highway improvement specifics related to the proposed projects have not been finalized at this writing. Improvement designs may or may not include a median strip.

h. Natomas Eastside Design Factors

(1) The relationship between project business park and residential components can be improved by the following measures:

- Increase the separation between the townhouse row and nearest office structure;
- Limit the height of office-commercial elements nearest the townhouses to 35 feet; and
- Provide heavy planting to visually buffer the townhouses from nearby office-commercial activities.

(2) Provide more breaks, and wider separations between breaks, along the townhouse row nearest the channel to increase exposure and perception of channel proximity for other townhouse units.

(3) Emphasize reduction of visual impact on office overviews in landscape treatments of project parking areas and freeway frontages.

g. Gateway Center Design Factors

(1) Emphasize reduction of visual impact on office overviews in landscape treatments of the project parking areas and freeway frontage.

M. NOISE

1. EXISTING SETTING.

a. Noise Standards in Effect

The city of Sacramento has adopted standards in the General Plan Noise Element (1975) identifying acceptable noise levels for various land uses. The noise standard for residential development in areas affected primarily by freeway noise is 67 Ldn. Business, professional office, and commercial developments in the vicinity of freeways have a noise standard of 72 Ldn.*

Current ambient noise levels at the project site are relatively low with the major source of noise being auto and truck traffic from I-5 and I-880.

Contribution of Development under the South Natomas Community Plan to Noise Levels. Full development of South Natomas as designated in the SNCP would increase traffic-generated noise levels along I-5, I-880, and on internal arterials and collector streets.

Using California Department of Health Noise Control Section (CDHNCS) methodology, 24-hour day-night noise levels (Ldn) along the affected roadways were calculated for development conditions in 1990.¹ Estimated current noise level contours were plotted on Figure 20. Input to the CDHNCS model included average daily traffic (ADT) volumes, peak-hour volumes, speed, vehicle mix data, and road geometrics as described in the TRAFFIC AND CIRCULATION section of this report.

Table 48 includes comparisons of the predicted Ldn values to the city's noise standards for adjacent land uses. As shown, the standards would be exceeded along many roadway segments if full SNCP buildout takes place. Mitigation in the form of sound walls or berms would be required where standards are exceeded.

2. IMPACTS

a. Compatibility of the Proposed Projects with the Projected Noise Environment

The compatibility of the proposed projects with the resulting noise environment on the sites is determined by comparing the noise levels which would exist at the time project completion is proposed (1990) with the noise and land use compatibility guidelines recommended by the State of California, as shown in Appendix B. (City noise standards have been established which are consistent with the state guidelines:

* Noise Element and EIR, Sacramento City General Plan, August 1975; Table 5: Land Use Compatibility for Community Noise, p. 14.

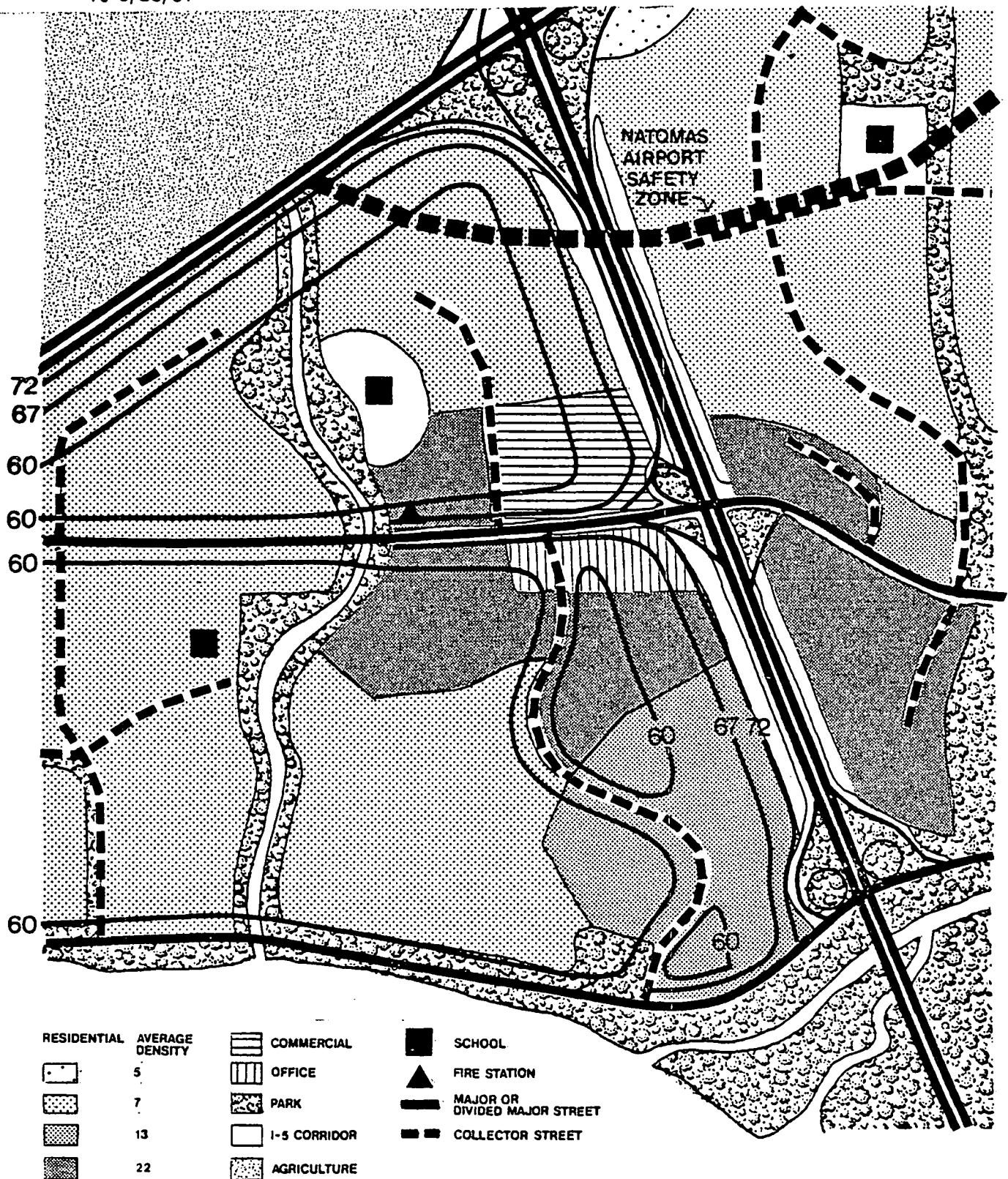
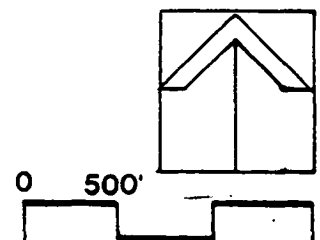


FIGURE 20
CURRENT Ldn
NOISE CONTOURS
VS SNCP LAND USE POLICY



K. AIR RESOURCES

I. EXISTING SETTING

a. Air Quality Controls in Effect

In 1977, the U.S. Environmental Protection Agency (EPA), under the authority of the 1977 Clean Air Act Amendments, designated the Sacramento Air Quality Maintenance Area (AQMA) as a non-attainment area for ozone and carbon monoxide. In response, the Sacramento Regional Area Planning Commission (now named the Sacramento Area Council of Governments -- SACOG) prepared an Air Quality Plan which outlines control strategies to attain pollutant standards by 1987.

Ambient air quality standards established by EPA and the California Air Resources Board are shown on Table 42. These standards represent the levels of air quality that must be achieved to protect public health and welfare in the Sacramento Valley airshed.

b. Regional Conditions

Air pollution levels in the Sacramento area have increased significantly within the last several years due to recent rapid growth in combination with a localized air inversion problem.

Air quality is measured in Sacramento on a continual basis by the County Air Pollution Control District and the California Air Resources Board. The monitoring indicates that the Sacramento AQMA exceeds federal standards for ozone and carbon monoxide, while total suspended particulate (TSP) levels exceed both state and secondary federal standards.

(1) Ozone. In 1978, ozone levels at the downtown Sacramento air monitoring station (closest monitoring station to the site) exceeded the federal standard on 6 different days. At an east Sacramento station (closer to the foothills) the ozone standards were exceeded on 15 days. The worst conditions were recorded in the eastern foothills at Folsom, where 23 ozone violation days were recorded.

The air quality problem at Folsom is typical of the foothills east of Sacramento. The area is heavily influenced by prevailing southwesterly winds which transport ozone and its precursors (hydrocarbons and nitrogen oxides) from urban Sacramento to the east.

(2) Carbon Monoxide. Carbon monoxide levels exceeded the federal standard of 9 ppm (8-hour average) on eight days in the 1978 at the east Sacramento station; no violations were recorded at the downtown or Folsom stations.²

Table 42
AMBIENT AIR QUALITY STANDARDS

| Pollutant | Time Averaging | California ^a Standards | National Standard ^b | |
|------------------------------------|--------------------------|--------------------------------------|--------------------------------|-------------------------|
| | | | Primary ^c | Secondary ^d |
| Ozone | 1 hour | 200 ug/m ³ | 240 ug/m ³ | Same as Primary Std. |
| Carbon Monoxide | 12 hour | 10 ppm | -- | Same as Primary Std. |
| | 8 hour | -- | 9 ppm | |
| | 1 hour | 40 ppm | 35 ppm | |
| Nitrogen Dioxide | Annual Average | -- | 0.05ppm | Same as Primary Std. |
| | 1 hour | 0.25ppm | -- | |
| Sulfur Dioxide | Annual Average | -- | 0.03ppm | -- |
| | 24 hour | 0.04ppm | 0.14ppm | -- |
| | 3 hour | -- | -- | .05 ppm |
| Suspended Particulate Matter | Annual Geometric mean | 60 ug/m ³ | 75 ug/m ³ | 60 ug/m ³ |
| | 24 hour | 100 ug/m ³ | 260 ug/m ³ | 150 ug/m ³ |
| Hydrocarbons | 3 hour | -- | 160 ug/m ³ | Same as Primary Std. |
| Lead | 30 day average | 1.5 ug/m ³ | -- | -- |

SOURCE: CH2M HILL.

^aCalifornia standards are values that are not to be equaled or exceeded.

^bNational standards, other than those based on annual averages or annual geometric means, are not to be exceeded more than once per year.

^cNational Primary Standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Each state must attain the primary standards no later than 3 years after the state implementation plan is approved by the Environmental Protection Agency.

^dNational Secondary Standards are the levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. Each state must attain the secondary standards within "a reasonable time" after the state implementation plan is approved by the EPA.

c. Contribution of Development under the South Natomas Community Plan to Air Pollution

An air quality analysis was conducted on both a micro- and regional scale for SNCP buildout. The microscale analysis involved the use of a computerized air quality model, CALINE 3. CALINE 3 is a line-source dispersion model developed by Caltrans to estimate carbon monoxide (CO) pollutant levels adjacent to highways and arterial streets.³

The regional-scale analysis consisted of estimating the gross daily emissions for all pollutants that would occur from vehicle trips generated in the study area. The following analysis assumed complete development of the site by either 1990 or the year 2000.

(1) Model Assumptions and Input. Worst case meteorological and traffic conditions were assumed for model input. A wind speed of one meter per second and very stable atmospheric conditions (Class F) were assumed for the analysis. Generally, maximum CO levels occur at the roadway edge when the prevailing wind direction is parallel to the roadway. Because of the high traffic levels on El Camino Avenue and corresponding low speeds during the peak hour, it is believed that peak CO levels would occur when the wind is parallel to El Camino Avenue; thus, a westerly wind (270°) was applied.

Peak hour traffic levels appropriate for each roadway segment under the South Natomas development scenario without the projects were included in the input data. El Camino Avenue, Garden Highway, and Northgate Road were all assumed to be operating at Level of Service "F", as determined in the TRAFFIC AND CIRCULATION section of this report, with an average vehicle speed of 10 mph. I-880 and I-5 would not be as congested; the average vehicle on these routes was assumed to be travelling at a speed of 45 mph during peak hour.

Table 43 provides a summary of the physical and operational characteristics of the relevant roadways with development under the adopted SNCP. Composite emission factors for 1990 and 2000 corresponding to the above vehicle speeds were derived from the Caltrans EMFAC 5 model (updated January 1980).

(2) Microscale Analysis. Table 43 lists peak CO levels projected for various local receptors shown on Figure 18 in both 1990 and 2000. Carbon monoxide levels are estimated at the edge of the right-of-way; included in the estimate is a 2.0 parts per million (ppm) background level, which would occur with or without SNCP buildout. The maximum predicted CO level is 13.8 ppm and occurs at a receptor located near the intersection of El Camino Avenue and Truxel Road.

It is apparent that the one-hour federal CO standard of 35 ppm or California standard of 40 ppm would not be exceeded in the study area during the next 20 years under the current SNCP.

(3) Regional Analysis. Estimates of daily gross regional emissions are based primarily on the number of vehicle trips generated by development under the adopted SNCP and on the average distance travelled by employees and residents in work-to-home trips.

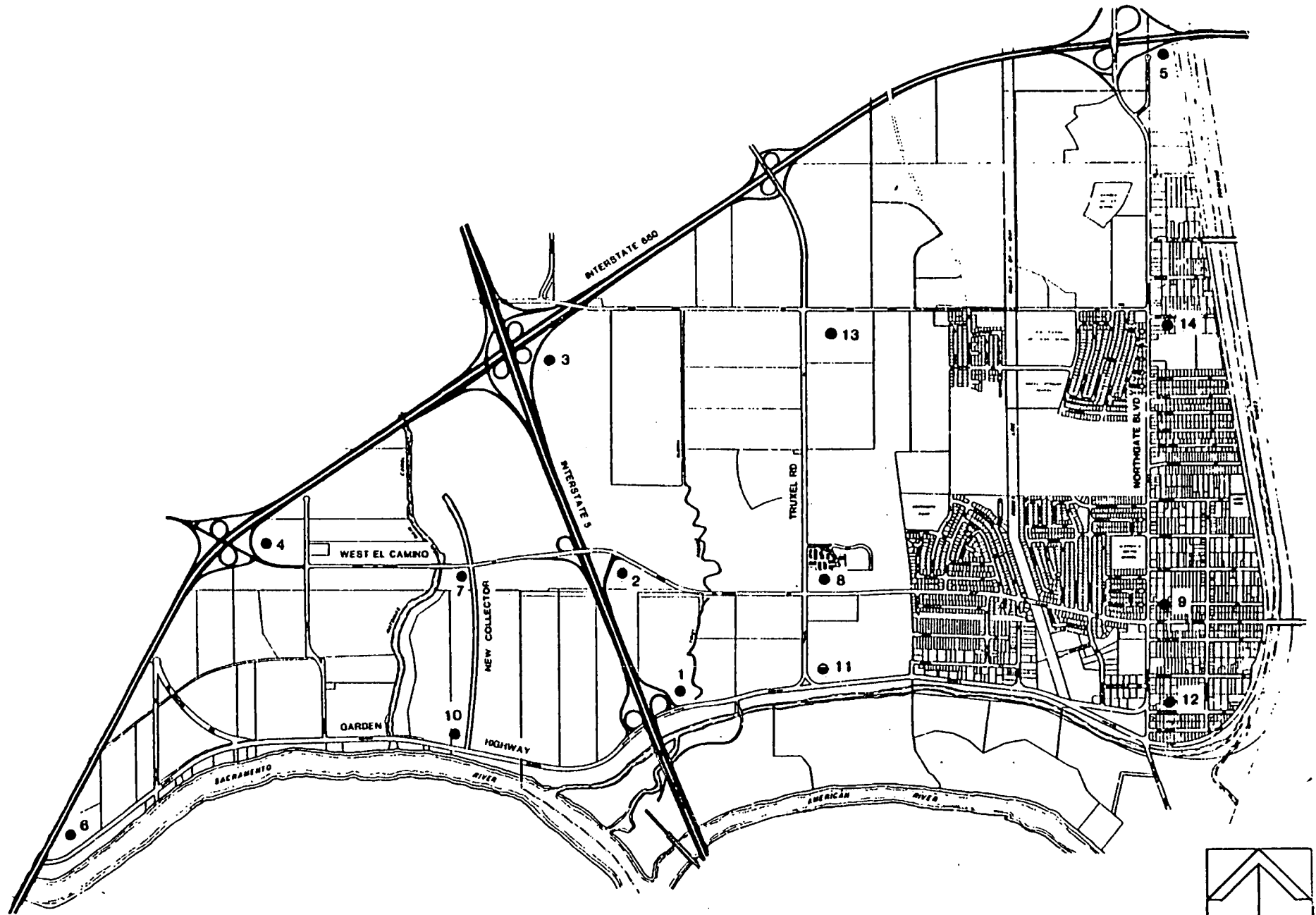
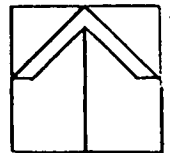


FIGURE 18
CARBON MONOXIDE RECEPTOR LOCATIONS



K-4
Air Resources

feet 0 1000 2000 3000

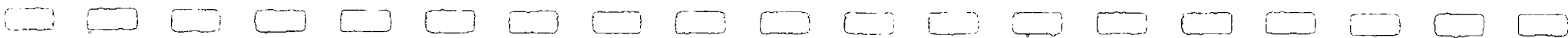


Table 43.
PREDICTED CARBON MONOXIDE LEVELS FOR ADOPTED SNCP

| <u>Receptor</u> | <u>Location</u> | <u>Peak 1-Hour Concentration (ppm) at Edge of Roadway^{a,b}</u> | |
|-----------------|--------------------------------|---|-------------|
| | | <u>1990</u> | <u>2000</u> |
| 1 | I-5 at Garden Hwy | 5.0 | 4.7 |
| 2 | I-5 at El Camino | 8.0 | 7.5 |
| 3 | I-5 at I-880 | 4.1 | 4.0 |
| 4 | I-880 at El Camino | 3.3 | 3.3 |
| 5 | I-880 at Northgate | 6.9 | 6.3 |
| 6 | I-880 at Garden Hwy | 2.5 | 2.5 |
| 7 | El Camino at Natomas Oaks Dr. | 5.5 | 5.1 |
| 8 | El Camino at Truxel | 13.8 | 12.4 |
| 9 | El Camino at Northgate | 10.8 | 9.6 |
| 10 | Garden Hwy at Natomas Oaks Dr. | 4.2 | 4.0 |
| 11 | Garden Hwy at Truxel | 2.4 | 2.4 |
| 12 | Garden Hwy at Northgate | 12.7 | 11.6 |
| 13 | Truxel at San Juan | 2.4 | 2.3 |
| 14 | Northgate at San Juan | 5.4 | 5.0 |

SOURCE: CH2M HILL.

^aA 2 parts per million (ppm) CO background level was added to all predicted concentrations.

^bFederal 1-hour standard for CO is .35 ppm.

^cSee Figure 18 for receptor locations.

An estimated 8,800 internal vehicle miles travelled (VMT) and 1,186,000 external VMT (for a total of 1,194,800 VMT) would be generated under the SNCP. The total gross contribution of pollutants emitted into the Sacramento Valley airshed by SNCP development-generated trips is shown on Table 44. (Composite emission factors were again derived from EMFAC 5 assuming an average vehicle speed of 35 mph⁴ for external trips and 20 mph for internal trips.)

Table 44
PREDICTED REGIONAL MOBILE SOURCE EMISSIONS UNDER SOUTH NATOMAS
COMMUNITY PLAN

| <u>Pollutants</u> | <u>Daily Gross Emissions^a 1990 (tons/day)</u> |
|------------------------------------|--|
| Carbon Monoxides (CO) | 17.9 |
| Nitrogen Oxides (NO _x) | 2.7 |
| Total Hydrocarbons (THC) | 1.5 |
| Sulfur Dioxide (SO ₂) | 0.3 |
| Particulates (TSP) | 0.4 |

SOURCE: CH2M HILL.

^aSample calculation: VMT x Emission Factor = Total Emissions

2. IMPACTS

An air quality analysis was conducted to compare the effects of proposed project land use changes with site land uses under the adopted SNCP on both a micro- and regional scale.

a. Models Used

The microscale analysis involved the use of the CALINE 3 Model. The regional scale analysis consisted of estimating the gross daily emissions that would occur from vehicle trips generated by the study area buildout with the two projects.

The following analysis assumed that complete development of the site would occur in 10 years or by 1990 (the applicants have estimated completion within 7 years of approval). Development by the year 2000 was also analyzed for comparison.

b. Microscale Analysis

In determining the roadside ("mobile-source") air quality effects of the land use change, a microscale analysis for CO was conducted. Predicted traffic volumes for the years 1990 and 2000 for the adopted community plan and the proposed project changes were used in the comparison. Only those streets affected by traffic from the projects were considered.

Table 45 provides a comparison of predicted roadside CO levels for various receptors shown on Figure 18 with and without the projects. It is apparent that implementation of the proposed projects would increase CO levels at some locations such as Receptor 8 over those estimated to occur with SNCP. Maximum estimated levels at Receptor 8 are expected to increase from 13.8 ppm to 16.7 ppm in 1990.

Overall, the increases in onsite CO levels vary from 0.1 to 2.9 ppm, depending on receptor location. These increased values, however, still remain well below the respective federal or state one-hour CO standards of 35 and 40 ppm.

c. Regional Analysis

The proposed projects would increase South Natomas-generated total vehicle miles travelled (VMT) from 1,194,800 to 1,630,300 per day. Table 46 compares the adopted SNCP-generated VMT with that of the proposed projects. The total gross emissions of each pollutant for both cases are shown on Table 47. The tables indicate that total project-generated gross emissions would increase about 28 percent over the current SNCP buildout emission projections.

It is also of interest to compare the difference between the project-related emissions and emissions related to the adopted SNCP with future emissions projections (1990) for the Sacramento Air Quality Maintenance Area. Project and SNCP emissions are compared on Table 47 with the total projected highway vehicle emissions for the Sacramento air basin.

Emissions for the adopted SNCP have previously been deemed acceptable for the Sacramento Valley airshed. If the proposed projects are implemented, the increase in emissions would account for a very small percentage of the total projected 1990 AQMP highway vehicle emissions inventory (2.1 to 3.3 percent) depending upon the specific pollutant.

SACOG has stated that development and corresponding emissions from the South Natomas area were included in the projected growth for the Sacramento AQMA Air Quality Plan.⁵ Thus, it can be concluded that the proposed project emissions, which will add 2 to 3 percent to the 1990 inventory, would still be consistent with the intent of the Air Quality Plan.

Table 45
PREDICTED ROADSIDE CARBON MONOXIDE LEVELS: SOUTH NATOMAS
COMMUNITY PLAN VS. PROPOSED PROJECT

| Receptor | Location ^c | Peak 1-Hour Concentration (ppm) at Edge of Roadway ^{a,b} | | | |
|----------|-----------------------------------|---|---------------------|-------------------------|---------------------|
| | | 1990 Adopted Plan | Proposed Project | 2000 Adopted Plan | Proposed Project |
| 1 | I-5 at Garden Hwy | 5.0 | 5.8 | 4.7 | 5.4 |
| 2 | I-5 at El Camino | 8.0 | 10.5 | 7.5 | 9.5 |
| 3 | I-5 at I-880 | 4.1 | 4.3 | 4.0 | 4.1 |
| 4 | I-880 at El Camino | 3.3 | 3.5 | 3.3 | 3.4 |
| 5 | I-880 at Northgate | 6.9 | 7.3 | 6.3 | 6.7 |
| 6 | I-880 at Garden Hwy | 2.5 | 2.5 | 2.5 | 2.5 |
| 7 | El Camino at Natomas Oaks Dr. | 5.5 | 6.7 | 5.1 | 6.2 |
| 8 | El Camino at Truxel | 13.8 | 16.7 | 12.4 | 15.0 |
| 9 | El Camino at Northgate | 10.8 | 11.5 | 9.6 | 10.4 |
| 10 | Garden Hwy at Natomas Oaks Dr. | 4.2 | 5.1 | 4.0 | 4.8 |
| 11 | Garden Hwy at Truxel | 2.4 | 2.5 | 2.4 | 2.4 |
| 12 | Garden Hwy at Northgate | 12.7 | 14.9 | 11.6 | 13.5 |
| 13 | Truxel at San Juan | 2.4 | 2.4 | 2.3 | 2.4 |
| 14 | Northgate at San Juan | 5.4 | 5.7 | 5.0 | 5.2 |

SOURCE: CH2M HILL.

^aA 2 parts per million (ppm) CO background was added to all predicted concentrations.

^bFederal 1-hour standard for CO is 35 ppm.

^cSee Figure 18 for receptor locations.

Table 46
COMPARISON OF SOUTH NATOMAS COMMUNITY PLAN
AND PROPOSED PROJECT VMT

| Trip Distribution by Direction | Average Miles Travelled | Total Vehicle Miles Travelled (in 1,000's) | |
|--------------------------------------|-------------------------------|---|---------|
| | | Plan | Project |
| West | 15.00 | 102.0 | 139.5 |
| S/SE | 9.17 | 752.9 | 1,022.1 |
| East | 6.00 | 51.3 | 69.7 |
| NE | 10.91 | 279.8 | 380.5 |
| North | 4.00 | 0.0 | 0.0 |
| Internal | 2.00 | 8.8 | 18.5 |
| | | 1,194.8 | 1,630.3 |

SOURCE: CH2M HILL.

Assumptions:

- A.M. peak = 10 percent of ADT
- All traffic going south uses either I-5 or Northgate
- All traffic going west uses I-880
- All traffic going east (25 percent)/northeast (75 percent) uses I-880 and El Camino
- Average internal trip length = 2.0 miles

Table 47
COMPARISON OF SITE RELATED GROSS EMISSIONS
WITH 1990 SACRAMENTO AQMP EMISSION PROJECTIONS (tons/day)

| Pollutant | Site Generated Emissions | | | AQMP Highway Vehicle Emissions ² | Percentage ³ |
|------------------------------------|--------------------------|---------|-------------------------|---|-------------------------|
| | Adopted Plan | Project | Difference ¹ | | |
| Carbon Monoxide (CO) | +17.9 | +24.5 | +6.6 | 264.8 | 2.5 |
| Nitrogen Oxides (NO _x) | +2.7 | +3.7 | +1.0 | 48.4 | 2.1 |
| Total Hydrocarbons (THC) | +1.5 | +2.1 | +0.6 | 27.7 | 2.1 |
| Sulfur Dioxide (SO ₂) | +0.3 | +0.4 | +0.1 | 3.3 | 3.0 |
| Particulates (TSP) | +0.4 | +0.6 | +0.2 | 6.0 | 3.3 |

SOURCE: CH2M HILL.

¹Difference between project and SNCP emissions.

²Portion of 1990 Sacramento Air Quality Maintenance Plan emissions projections that are generated only by highway vehicles. Source: SRAPC Air Quality Plan, Technical Appendix, January 1979.

³Percentage = $\frac{\text{Difference (Project-SNCP emissions)}}{\text{AQMP Highway Vehicle emissions}} \times 100$

3. MITIGATION MEASURES

a. Mobile Sources

Transit service is often the best mechanism for reducing vehicle trips and related mobile source emissions. However, for the South Natomas community in 1990, it has been estimated in this analysis (TRAFFIC AND CIRCULATION section) that transit use will account for only about 6 percent of total trips generated to and from the area. Thus, transit service cannot be expected to become a significant factor in reducing the predicted 28 percent increase in site-generated emissions.⁶

Even if improved transit service could be made available in the future, and significant ridership (6 to 30 percent of total travel) was attracted, the resultant air pollution reduction would be small.

Because the project emission increases would still be substantially below standards established in the Sacramento AQMA Air Quality Plan, this lack of effective traffic-

related air quality mitigation opportunities would not affect project compliance with current regulations.

b. Stationary Sources

Stationary source emissions are not expected from the proposed projects. Unlike industrial developments, business parks consisting of commercial and office space are not normally emitters of point source pollutants.

However, if a stationary source does locate in the projects, an "Authority-to-Construct" permit would be required by the Sacramento County Air Pollution Control District. The permit requirements are designed to prevent violations of air quality standards through the use of "Best-Available-Control-Technology" and other compensative reductions (offsets).

4. REFERENCES

¹Sacramento Regional Area Planning Commission, Final Air Quality Plan, January 1979.

²Robert Cofer, Sacramento County Air Pollution Control District, Personal Communication, re: "Sacramento Area Air Quality", by CH2M Hill, Sacramento, March 12, 1980.

³CALTRANS, CALINE 3--A Versatile Dispersion Model for Predicting Air Pollutant Levels Near Highways and Arterial Streets, FHWA/CA/TL-79/23. November 1979.

⁴CALTRANS, SATS COMPUTER MODEL RUN FOR NORTHEAST SACRAMENTO CORRIDOR STUDY, 1979.

⁵Gary Stonehouse, Sacramento Area Council of Governments, Personal communication, re: "Projects' compliance with Sacramento AQMA Air Quality Plan", by CH2M Hill, June 6, 1981.

⁶Sacramento Regional Area Planning Commission, Draft Environmental Impact Report for the Regional Transportation Plan for the Sacramento Region, January 1977.

L. VISUAL AND OTHER DESIGN FACTORS

Construction of the proposed projects would result in a change in the visual impacts associated with SNCP buildout. Changes in visual impact considered in this section include:

- General changes in the visual characteristics of the project sites and South Natomas vicinity;
- Changes in surrounding travel route visual characteristics and relationships to related design policies; and
- Changes in site development relationships to other city design policies.

In addition to these visual considerations, other project design factors are evaluated including interrelationships within the proposed land use mix, and project sensitivity to special site features.

I. EXISTING SETTING

a. Site and Vicinity

(1) Special Features. Two of the most significant visual features on or adjacent to the project sites are the Natomas Main Drainage Canal (Photographs 1 and 2)* and the mature tree groupings near Garden Highway (Photos 1 and 3). Other distinct visual elements in the project vicinity include the I-5 and I-880 freeways and related overpass structures, lighting, and signage; the Garden Highway levee; electrical transmission lines; and an electrical substation. Some of these features are shown in Photograph 1. East of I-5, relatively large-scale residential development is beginning to dominate the landscape.

Visual Vulnerability. Because of the flat landscapes and open background of many views (see Photos 5 through 8), the area is particularly vulnerable to radical visual changes resulting from intensive urbanization.

(2) SNCP Buildout Scenario. With SNCP buildout, the rural image of the area will be replaced by intensive suburbanization. The visual role of the Sacramento River as the natural separation between urbanization to the south and agricultural open space to the north was lost with adoption of the SNCP. Under current city and county plans, I-880 will become a more abrupt, manmade edge or visual separator between urbanization and cropland.

*Photo locations are indicated on Figure 19.

b. Surrounding Travel Routes and Related Local Policies

(1) Interstate 5. I-5, the primary route to central Sacramento from Metropolitan Airport and regions to the north, is highly valued as a scenic corridor and important visual entryway to the central city. At present, the I-5 bridges across American River and the Discovery Park greenbelt provide a distinct and dramatic gateway from northern agricultural areas into the industrial-commercial landscape of the central city.

(a) SNCP Effects. Urbanization of South Natomas under the adopted community plan will significantly diminish this gateway effect. The perception of the American River, highlighted by Discovery Park, as the natural urban-rural separator at this edge of the city will be lost.

(b) I-5 Policies. In recognition of the need to mitigate this effect and maintain the route's importance, the I-5 corridor has received special attention in the SNCP and city zoning ordinance. A cooperative effort between the city, Caltrans, Federal Highway Administration, and affected property owners has resulted in agreements regarding the design and implementation of a gateway corridor along I-5 between I-880 and downtown. These agreements specify responsibilities of the participants for:

- corridor surveying and mapping (city);
- land acquisition (city);
- liquidation of assessment bonds (city);
- transference of title (city to state);
- land dedication (property owners);
- construction of berms and walls (property owners);
- landscaping (federal and state); and
- maintenance (state).

The stated purpose of the corridor is to create an entryway into the city, while minimizing visual, noise, and air pollution problems for residents along the freeway. The corridor would occupy approximately 17 acres linearly on both sides of the freeway along the site frontages, and would be landscaped with native and native-appearing trees, shrubs, grasses, and wildflowers.

An undulating wall is specified in the plan to define the outer boundary of the corridor, restrict access to the freeway, attenuate noise, and partially block diffusion of air pollutants. A noise wall of this type would block freeway views of SNCP-designated residential development beyond.

Special I-5 corridor overlay zone provisions have been established to implement this program (described herein under LAND USE). Portions of the project sites are

subject to these regulations which require a conditional use permit and architectural review.

Corridor improvements will be constructed incrementally as urban development occurs. Few gateway corridor improvements have been constructed to date (most recent development has been occurring away from the freeway to the east and west). Because gateway improvements are not yet extensive, ultimate design themes and styles have not been firmly established.

(2) Interstate 880. I-880 also provides roadside views of the site, which can now be characterized as fringe area cropland landscapes.

(a) SNCP Effects. With SNCP buildout, I-880 will replace the American River as the physical separator between rural and urban Sacramento landscapes. Under current SNCP policy, I-880 will become the east-west edge around the north side of urban Sacramento.

(b) I-880 Policies. While not subject to the same landscaped corridor improvement requirements as is I-5, similar noise standards apply to I-880. It is assumed that adjacent residential development designated in the plan would also require construction of a continuous, solid noise barrier. Similarly, such a barrier would block I-880 views of site residential structures.

3. Garden Highway. This elevated route along the south side of the Gateway Centre site atop the Sacramento River levee forms a visually distinct southern edge to the South Natomas community. The elevated route also provides an overview of the site. Some views are partially obstructed by individual and clustered roadside trees (Photos 3 and 4). The large riparian and valley broadleaf trees, on either side of the riverside route are important visual features.

(a) SNCP Effects. With development of the Natomas Oaks PUD site (Gateway Centre) according to adopted plans, most of the large trees that contribute to the Garden Highway view would be protected. Buildout under SNCP policies would replace existing rustic structures (Photo 4), and background views of cropland with a suburban landscape--primarily residential in scale (principally single family, but also duplexes, townhouses, condominiums, cluster homes, and apartments).

4. West El Camino Avenue. This route bisects the combined sites into north and south halves. The electrical substation and transmission lines are most conspicuous along this road.

(a) SNCP Effects. Roadside views of the project area with SNCP buildout would be typical of Sacramento suburban areas, with neighborhood and community scale commercial development near the I-5 interchange and a high density residential landscape on both sides of the remaining route. The existing substation and proposed fire station would also be roadside visual elements.

c. Other Local Design Policies

(I) General Urban Design Policies. Visual and design concerns are addressed in the Open Space and Community Design elements of the city's General Plan. Policies related to site development primarily involve scenic routes, and include the following:

- designate important entrances to urban Sacramento, and initiate a study to upgrade and preserve existing amenities, including open space, as a possible feature thereof;
- continue to improve the open space aspects of the vehicular circulation system through tree planting and similar landscaping programs;
- urge the State Division of Highways to landscape open spaces within transportation corridors under their jurisdiction as expeditiously as possible following construction activities;

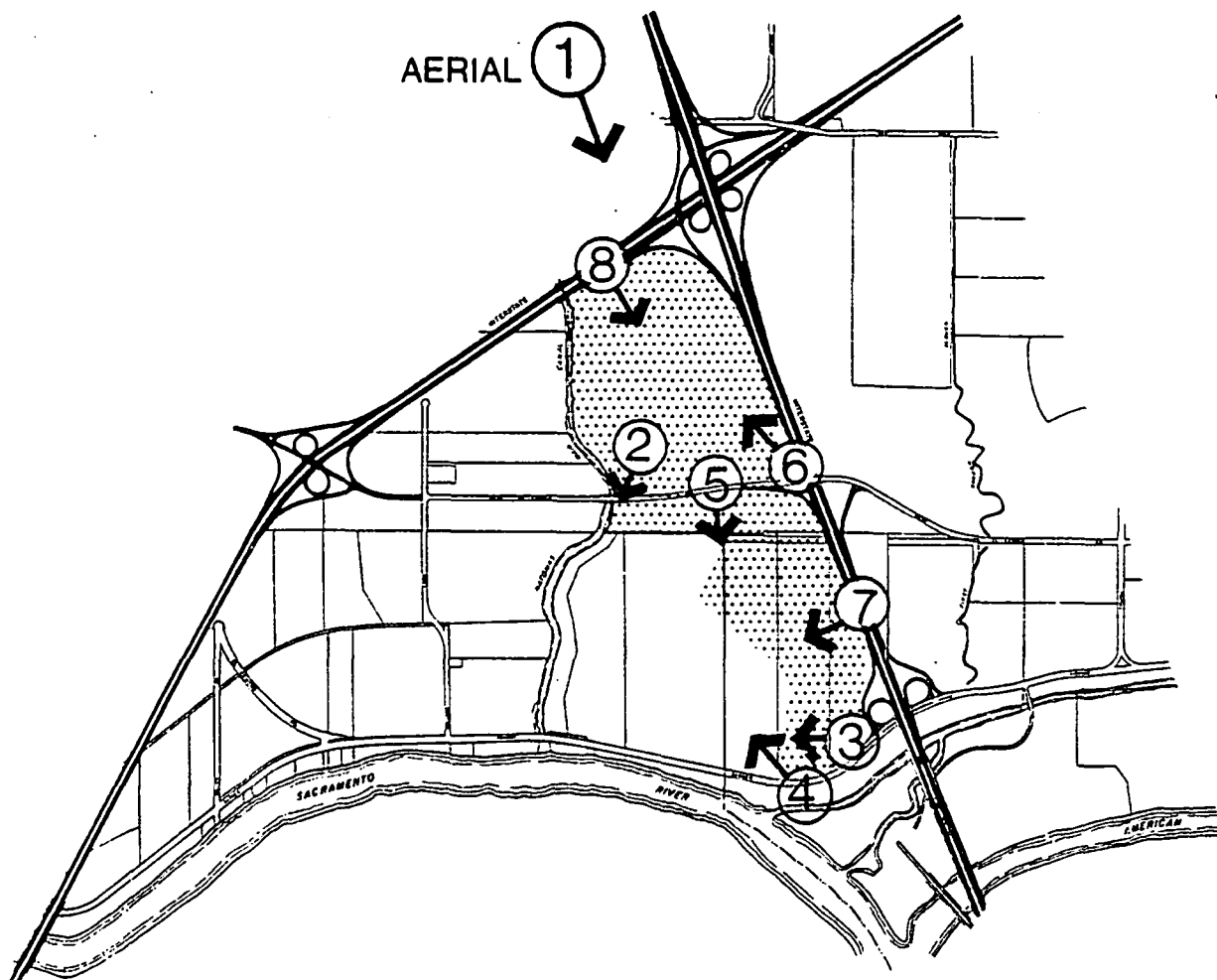


FIGURE 19
ROADSIDE VIEWS
KEY TO PHOTOGRAPHS

South Natomas Business Parks DEIR
10 8/28/81

L--5
Visual and Other Design Factors



OTO 1-AERIAL

A GATEWAY CENTER
B NATOMAS BUSINESS PARK



PHOTO 2



PHOTO 3



PHOTO 4

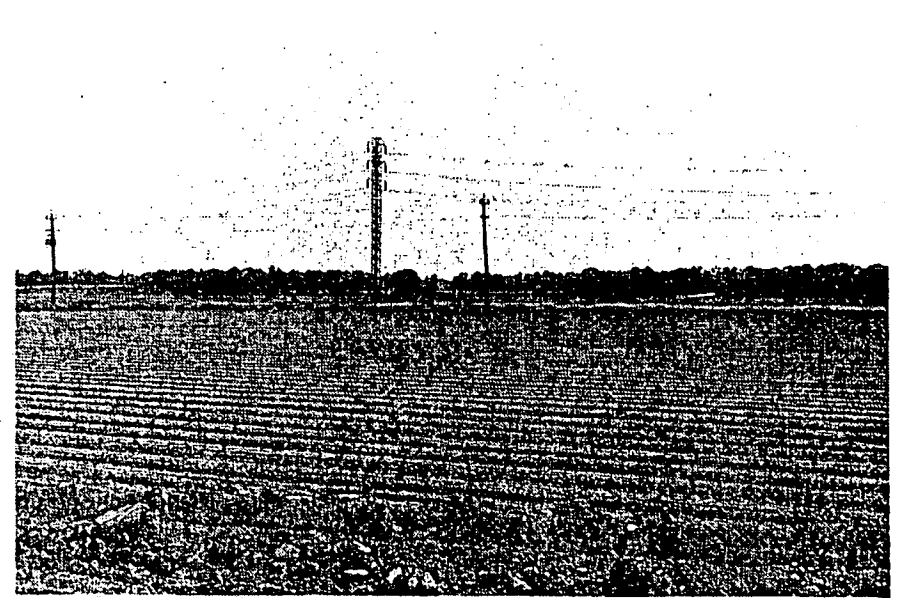


PHOTO 5



Table 48
NOISE IMPACTS OF COMMUNITY PLAN DEVELOPMENT

| Roadway Segment | Adjacent Land use | Noise Standard ^a (Ldn) | Calculated Noise Level (Ldn) | Standard Exceeded |
|---------------------------------------|------------------------|--------------------------------------|---------------------------------|-------------------|
| <u>Garden Highway</u> | | | | |
| I-880 east to canal | Res. (7 un.) | 67 | 65 ^b | No |
| Canal to Natomas Oaks Drive | Res. (7 un.) | 67 | 68 ^b | Yes |
| Natomas Oaks Drive to I-5 | Res. (7 un.) | 67 | 70 ^b | Yes |
| I-5 east to Truxel | Res. (7 un.) | 67 | 69 ^b | Yes |
| <u>West El Camino</u> | | | | |
| I-880 east to Canal | Res. (7 un.) | 67 | 69 ^b | Yes |
| Canal to Natomas Oaks Drive | Res. (22 un.) | 67 | 67 ^b | No |
| Natomas Oaks Drive to I-5 | | | | |
| • northside | Commercial | 72 | 70 ^b | No |
| • southside | Bus/Office | 72 | 70 ^b | No |
| I-5 east to Truxel | Res. (12 un./22 un.) | 67 | 71 | Yes |
| <u>I-880</u> | | | | |
| Garden Hwy to I-5 | Res. (7 un.) | 67 | 69-72 ^c | Yes |
| <u>I-5</u> | | | | |
| Garden Hwy to 500' south of El Camino | Res. (7, 12, & 22 un.) | 67 | 77 ^c | Yes |
| 500' South of El Camino to El Camino | | | | |
| • westside | Bus/Office | 72 | 75 ^c | Yes |
| • eastside | Res. (22 un.) | 67 | 75 ^c | Yes |
| El Camino to 1000' south of I-880 | | | | |
| • westside | Commercial | 72 | 72 ^c | No |
| • eastside | Res. (22 un.) | 67 | 72 ^c | Yes |
| 1000' south of I-880 to I-880 | Res. (7 un.) | 67 | 72 ^c | Yes |

SOURCE: CH2M HILL.

^aCity of Sacramento noise standards for developments near freeways.

^bLdn calculated at 50 feet from edge of roadway.

^cLdn calculated at 100 feet from edge of freeway.

67 dBA for residential areas and 72 dBA for office areas. "Maximum average noise levels" are approximately equal to the Ldn figure plus 3 dB.)

Vicinity noise levels which can be anticipated with the projects are shown in Figure 21 (noise contour map) and Table 49. Input into the project-scenario analysis included ADT peak-hour volumes, speed, and vehicle mix data with buildout of the two projects in 1990.

A comparison of the Noise and Land Use Guidelines from Appendix B with the noise contour map (Figure 21) shows that proposed residential development in Natomas Eastside would be in the "Normally Acceptable" category." Buildings in Gateway Centre fronting on I-5 would be in the "Conditionally Acceptable" category; all other buildings in the project would be in the "Normally Acceptable" category.

(1) Impacts Requiring Consideration of State Noise Standards. Title 25 of the California Administrative Code requires preparation of a noise study and report for all new multifamily housing that would be situated on sites where the Community Noise Equivalent Level (CNEL) exceeds 60 dB. For the purpose of noise assessments, CNEL is similar to Ldn. The northernmost residential units in the Natomas Eastside project would be located in a noise environment where the CNEL would exceed 60 dB. Based on this assessment, the effects of local noise on new residents in these units would be significant enough to warrant mitigation studies under Title 25.

b. Project-Generated Additional Traffic Noise

The impact of increased traffic noise levels on offsite, noise-sensitive land uses has been assessed in terms of the increase over noise levels anticipated for development under SNCP. People have been found to be sensitive to changes in noise levels according to the following categories:

1. Except in carefully controlled laboratory experiments, an increase of only 1 dBA cannot be perceived;
2. Outside of a laboratory, a 3 dBA increase is considered to be a barely noticeable difference;
3. A change of at least 5 dBA is required before any noticeable change in community response could be expected; and
4. A 10 dBA increase is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Traffic-generated noise levels from the proposed Natomas Eastside and Gateway Centre projects are compared to SNCP buildout noise levels in Table 49. The predicted 24-hour day-night average noise levels (Ldn) were based on 1990 average daily traffic volumes projected along the street and highway segments impacted by the project (from TRAFFIC AND CIRCULATION section). Streets where less than a 5 percent increase in ADTs was projected from the proposed project or where traffic volumes were less than 20,000 ADT and, therefore, were too low to generate significant noise levels were not considered in this analysis.

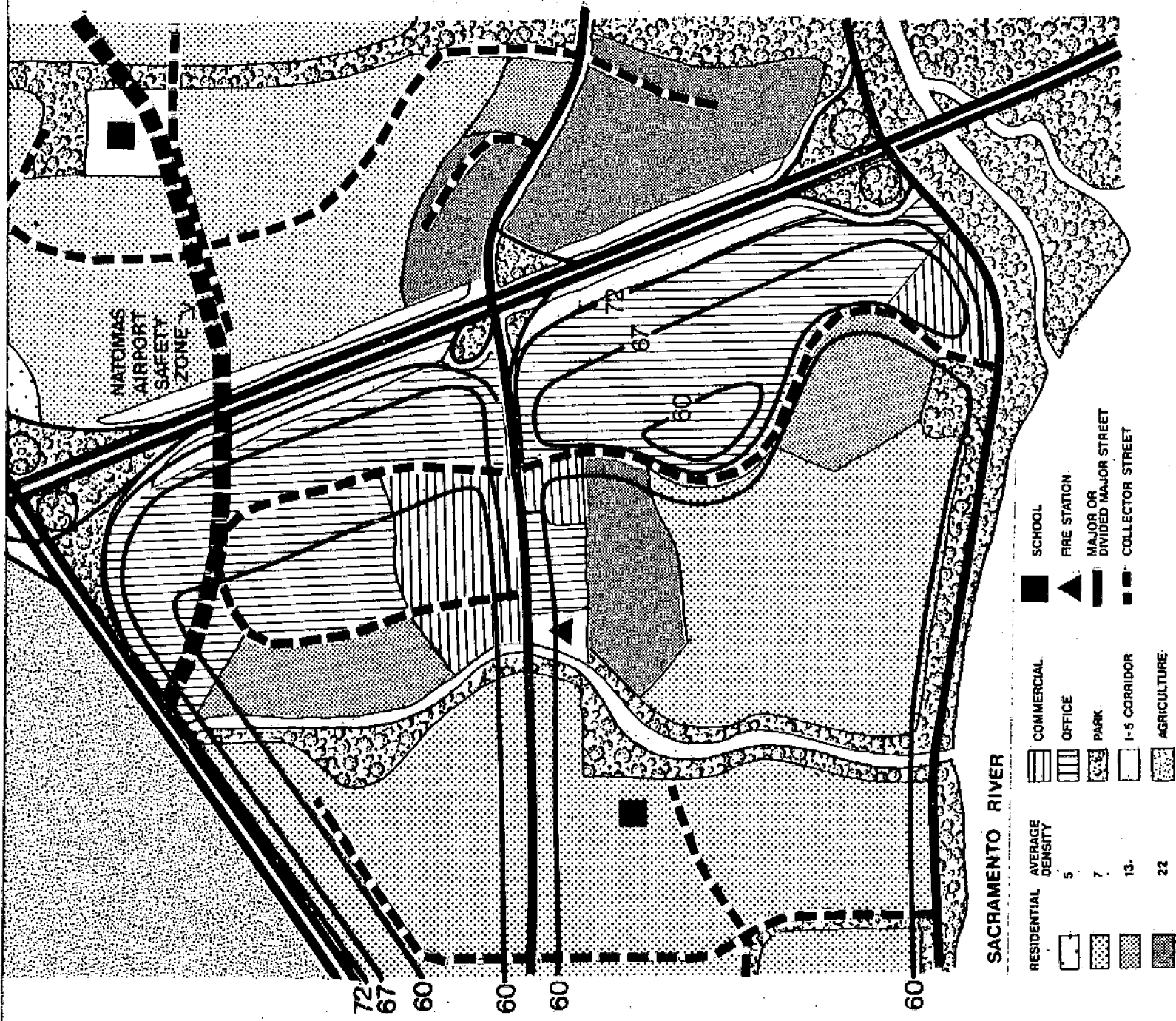


FIGURE 21
PROJECTED Ldn NOISE
CONTOURS--1990
VS PROPOSED LAND USE
POLICY CHANGES

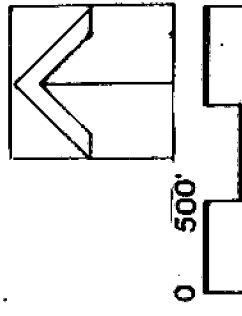


Table 49
NOISE IMPACTS OF PROPOSED PROJECT

| <u>Roadway Segment</u> | <u>Adjacent Land use</u> | <u>Noise Standard^a (Ldn)</u> | <u>Calculated Noise Level (Ldn)</u> | <u>Standard Exceeded</u> |
|-----------------------------|--------------------------|---|-------------------------------------|--------------------------|
| <u>Garden Highway</u> | | | | |
| I-880 to Natomas Canal | Res. (7 un.) | 67 | 65 ^b | No |
| Canal to Natomas Oaks Drive | Res. (12 un.) | 67 | 69 ^b | Yes |
| Natomas Oaks Drive to I-5 | Commercial | 72 | 71 ^b | No |
| I-5 east to Truxel | Res. (7 un.) | 67 | 70 ^b | Yes |
| <u>West El Camino</u> | | | | |
| I-880 to Natomas Canal | Res. (7 un.) | 67 | 69 ^b | Yes |
| Canal to Natomas Oaks Drive | Comm/Office | 72 | 69 ^b | No |
| Natomas Oaks Drive to I-5 | Bus/Office | 72 | 72 ^b | No |
| I-5 east to Truxel | Res. (12 & 22 un.) | 67 | 71 ^b | Yes |
| <u>I-880</u> | | | | |
| Garden Hwy to Natomas Canal | Res. (7 un.) | 67 | 69 ^c | Yes |
| Canal to I-5 | Bus/Office | 72 | 69 ^c | No |
| <u>I-5</u> | | | | |
| Garden Hwy to I-880 | | | | |
| • westside | Com/Bus | 72 | 78-72 ^{cd} | Yes |
| • eastside | Res. (7 & 22 un.) | 67 | 78-72 ^{cd} | Yes |

SOURCE: CH2M HILL.

^aCity of Sacramento noise standards for developments near freeways.

^bLdn calculated at 50 feet from edge of roadway.

^cLdn calculated at 100 feet from edge of freeway.

^dCalculated noise levels decreased progressively from 78 Ldn at the I-5/Garden Highway interchange to 72 Ldn at the I-5/I-880 interchange.

Overall, the calculations show that proposed project-generated traffic would not cause noticeable increases in roadside noise levels over that which would have occurred with SNCP buildout.

c. Relationship of Proposed Land Use Changes to Noise Standards. Project land uses adjacent to noise-generating roadways would, of course, be different than with the current SNCP. As shown in Table 49, business/professional office and commercial uses would replace some of the planned residential uses. The result would be a higher allowable noise standard along these roadway segments. The city's noise standards would still be exceeded along I-5 and in some surrounding areas, however.

d. Construction Period Noise

During construction, noise levels would be generated by trucks delivering and removing materials at the sites, and by heavy grading equipment, paving equipment, concrete pumping equipment, saws, hammers, and other typical onsite activity associated with construction of a project of this magnitude. The greatest amount of onsite construction noise is usually generated by grading and paving equipment, which typically emits maximum noise levels of about 86 dBA at a distance of 50 feet.

Traffic on local roads and freeways currently dominates the noise environment. Truck noise, a major component of local noise, is similar in nature and level to construction equipment noise. Therefore, construction activity in the vicinity of local major roads and freeways would not be expected to increase noise noticeably.

Construction activity along the western edge of the Gateway Centre project site, particularly along the primary collector street (Natomas Oaks Drive) where Natomas Oaks residential units would be located, would temporarily increase noise levels there. Maximum levels at the nearest houses that are planned as a part of the Natomas Oaks project could reach about 80 dBA. Such noise levels would interfere with conversation and other outdoor activities during the construction period of each project phase.

3. MITIGATION MEASURES

a. Compatibility of Project with Existing Noise Environment

(1) A noise study report, as required by Title 25 of the California Administrative Code, Noise Insulation Standards, would be required for the residential portion of the Natomas Eastside project during the building permit review process. The noise study report would contain a detailed analysis of methods to reduce environmental noise levels to 45 dB Ldn or less inside the proposed multifamily housing units situated where the Ldn would exceed 60 dB.

(2) There should be no problem with applying conventional noise abatement measures in project building designs where necessary to meet desirable interior noise levels of Ldn 45 dB. Some combination of the following measures should be considered to reduce interior noise levels in buildings in the Natomas Eastside project where exterior Ldn could exceed 60 dB:

- Design structures with ventilation features which would allow windows exposed to traffic noise to be closed for noise control.
 - Specify sound-rated window glass, particularly for residential elevations exposed to the noise environment along Natomas Oaks Drive on the Natomas Eastside site.
 - Use the screening effect of project structures closer to traffic noise-generating routes to reduce noise for interior structures (the Natomas Eastside site plan townhouse component appears to be located in such a noise-buffered manner in the applicant's preliminary site plan).
 - Incorporate other special noise abatement techniques, as needed, in project building design.
- (3) Locate project structures to shield outdoor activity from traffic noise.
- (4) 1-5 corridor structural noise barrier criteria set forth in the SNCP was developed to protect residential uses from freeway noise intrusion. The barrier requirement would be less appropriate for the proposed office-commercial uses, since such activity is generally less vulnerable to adverse noise impacts, associated noise standards are less stringent, and office-commercial building design characteristics lend themselves to more cost-effective architecture noise abatement measures (noise-attenuating walls, fixed glass, etc.) than do conventional residential structures.

b. Construction Period Noise

1. Construction should be limited to daytime weekday (non-holiday) hours (8 a.m. to 5 p.m.) in those areas within about 500 feet of houses constructed in Natomas Oaks.
2. All construction equipment should be properly muffled and maintained.

4. REFERENCES

¹ Jack W. Swing, Estimation of Noise Exposure from Highway Traffic in Terms of Day-Night Average Level (Ldn) Noise Contours, California Department of Health, Office of Noise Control, 1975.

² Ibid.

N. ENERGY

Development projects consume energy through three types of activity: (1) initial construction; (2) long-term maintenance and operation of buildings and other facilities; and (3) transportation. For purposes of consistency and comparison, all energy use calculation results in this analysis are presented in a common unit of measurement, the therm. A therm is a unit of heat energy equivalent to 100,000 British thermal units (Btus) of heat, 10 kilowatt hours of electricity, or about 0.74 gallons of gasoline.

1. EXISTING SETTING

a. Sources of Supply

Electricity would be provided by the Sacramento Municipal Utility District (SMUD), and natural gas by the Pacific Gas and Electric Company (PG&E).

As shown on Figure 2, a SMUD electrical substation is located on the south side of West El Camino Avenue at the bridge over the Natomas Main Drainage Canal. This substation is adjacent to the proposed fire station site shown in the Natomas East-side preliminary site plan (Figure 3). A related east-west electrical transmission line easement traverses the Gateway Centre site approximately 650 feet south of and parallel to West El Camino Avenue.

b. 1978 South Natomas Community Plan Energy Use

Estimates of energy consumption related to full urban development on the project sites under current SNCP policy are presented on Tables 50, 51, and 52. These estimates provide a base case for determining significant consumption changes attributable to the proposed land use changes.

Table 50 is an estimate of short-term construction-related energy consumption; Table 51 is an estimate of long-term consumption for lighting, heating, cooling, ventilation, and appliances; and Table 52 is an estimate of long-term consumption for automobile and truck use.

2. IMPACTS

a. Long-Term

(1) Structures. Under current SNCP buildout, annual energy consumption for lighting, heating, cooling, ventilation, and appliances would be approximately 4.14 million therms, whereas with the proposed land use changes, annual energy consumption

Table 50
ESTIMATED ANNUAL ENERGY CONSUMPTION FOR URBAN DEVELOPMENT
UNDER THE 1978 SOUTH NATOMAS COMMUNITY PLAN

| <u>Buildings</u> | <u>Quantity Factor</u> | <u>Annual Therms</u> | <u>Annual Energy Use</u> | <u>Percent of Total Demand</u> |
|-----------------------------------|----------------------------|----------------------------|------------------------------|------------------------------------|
| Residential | 2,255 units | 1,400/unit ^a | 3,157,000 | 76 |
| Business and Professional Offices | 300,200 sq.ft. | 1.38/sq.ft. ^b | 414,276 | 10 |
| Commercial/ Shopping Center | 410,800 sq.ft. | 1.38/sq.ft. ^b | 566,904 | 14 |
| Fire Station | 5,000 sq.ft. | 1.01/sq.ft. ^{b,c} | <u>5,050</u> | (less than 1%) |
| Total Energy Consumption | | | 4,143,230 | 100 |

SOURCE: Wagstaff and Brady; California State Energy Commission.

Note: All estimates are representative of worst-case conditions and do not include considerations of any extraordinary conservation measures.

^aAll housing units are assumed to have the same energy consumption characteristics as State Energy Commission estimates for a typical townhouse.

^bCalifornia State Energy Commission.²

^cThis factor is generally representative of energy consumption in warehouses.

Table 51
ESTIMATED CONSTRUCTION-RELATED ENERGY CONSUMPTION FOR BUILD-OUT OF PROJECT SITES UNDER THE 1978
SOUTH NATOMAS COMMUNITY PLAN

| Land Use Designation ^a | Average Density (units/acre) ^a | Area (acres) ^a | No. of Units (a) | Estimated Floor Space (sq.ft.) | | Estimated Energy Consumption (therms) ^b |
|--------------------------------------|---|------------------------------|------------------------|-----------------------------------|-----------|--|
| | | | | Per Unit | Total | |
| Residential | 7 | -- | 442 | 1,600 sq.ft./unit | 707,200 | 7,072,000 |
| Residential | 9 | -- | 199 | 1,400 sq.ft./unit | 278,600 | 2,786,000 |
| Residential | 11 | -- | 396 | 1,200 sq.ft./unit | 475,200 | 4,752,000 |
| Residential | 22-23 | -- | 1,218 | 1,000 sq.ft./unit | 1,218,000 | 12,180,000 |
| Business and Professional Offices | -- | 19 | -- | 15,800 sq.ft./acre ^c | 300,200 | 3,002,000 |
| Commercial/Shopping Center | -- | 26 | -- | 15,800 sq.ft./acre ^c | 410,800 | 4,108,000 |
| Fire Station | -- | 0.5 | -- | | 5,000 | 50,000 |
| Totals | | | | | 3,395,000 | 33,950,000 |

SOURCE: Wagstaff and Brady

^aSNCP, 1981 estimates.⁴

^bIt is assumed that about 10 therms per square foot of structure would be used to fabricate and transport materials to the site, and to construct the buildings. Source: Goldstein & Rosenfeld.⁵

^cFloor space estimated by dividing total office/commercial floor space of proposed projects by total allotted acreage.

Table 52
ESTIMATED TRANSPORTATION ENERGY CONSUMPTION FOR DEVELOPMENT
UNDER THE SNCP

| | <u>Development under SNCP</u> |
|---|-----------------------------------|
| Trips per Day | |
| Workday (a) | 37,100 |
| Weekend/Holiday (b) | 25,400 |
| Average Trip Distance (c) | 7.1 |
| Vehicle Miles per Day | |
| Workday | 263,410 |
| Weekend/Holiday | 180,340 |
| Average Energy Consumption per Vehicle (d) | 16.4 mpg |
| Daily Energy Consumption (gal.) | |
| Workday | 16,060 |
| Weekend/Holiday | 11,000 |
| Annual Energy Consumption (million gallons) (e) | |
| Workdays | 3.6 |
| Weekends/Holidays | <u>1.6</u> |
| Total Annual Fuel Consumption (million gallons) | 5.2 |
| Energy Value of Total Annual Fuel Consumption (million therms) | 7.0 |

SOURCE: Wagstaff and Brady.

(a) Includes total trips per day for all uses. Source: CH2M HILL.

(b) Includes total trips per day for all uses minus office uses, which are workday activities only. Source: CH2M HILL.

(c) SNCP EIR, Table XII-12.

(d) George S. Nolte and Assoc.⁶

(e) Total number of annual workdays assumed to be 233; weekends/holidays 142.

would be approximately 6.64 million therms, as shown on Table 53. According to these figures, the project's annual energy consumption would be about 60 percent greater than that of development under the SNCP.

(2) Transportation. Under the SNCP, annual energy consumption for transportation would be approximately 7.0 therms (Table 52); for the projects, 13.2 therms (Table 54). According to these figures, the projects' annual energy consumption for transportation would be about 89 percent greater than development under the SNCP. The increase would result from an anticipated increase in the number of daily trips.

(3) Combined Long-Term Structure and Transportation Energy Use. Combined annual energy consumption for structures and transportation under the SNCP would be approximately 11.1 million therms, and for the proposed projects approximately 19.8 million therms. Thus, estimated annual energy consumption for the projects would be approximately 78 percent greater than for development under SNCP.

b. Short-Term: Construction Period Energy Use

(1) Proposed Projects. Construction under SNCP would require approximately 33.95 million therms of energy to fabricate and transport materials to the site, and to construct buildings and other improvements; whereas, construction of the proposed projects would require about 48.95 million therms, as shown on Table 55.

According to these figures, the proposed projects would require over 40 percent more energy to construct than development allowed under the SNCP.

3. MITIGATION MEASURES

The current edition of the Uniform Building Code includes a number of requirements for energy conservation, with emphasis on roof and wall insulation. Proposed structures must comply with these standards before a building permit can be granted.

All new commercial-industrial construction in the state is required to meet minimum energy conservation standards set forth in Title 24 of the California Administrative Code. Because the projects represent a major change in planned land use designations that could result in significantly higher energy consumption levels, energy conservation measures beyond those mandated in the Uniform Building Code and Title 24 should be considered, such as those described below:

Energy Conservation Program. The applicants might be required to commission the preparation of a project-specific, energy-conservation program subject to review by SMUD and PG&E and approval by the city. Energy-conservation criteria could be included in the conditions, covenants, and restrictions of the projects, and be considered in design-review by city officials prior to issuance of building permits.

Table 53
ESTIMATED ANNUAL ENERGY CONSUMPTION FOR THE PROPOSED PROJECTS

| Project | Land Use Designation | Quantity Factor (a) | Annual Therms (b) | Total Annual Energy Consumption (Therms) | Percent of Total Demand |
|------------------|----------------------|---------------------|-------------------|--|-------------------------|
| Natomas Eastside | Office | 1,900,000 sq.ft. | 1.38/sq.ft. | 2,622,000 | 39 |
| | Commercial | 230,000 sq.ft. | 1.38/sq.ft. | 317,400 | 5 |
| | Residential | 468 units | 1,400/unit | 655,200 | 10 |
| | Fire Station | 5,000 sq.ft. | 1.01/sq.ft. | 5,050 | (less than 1%) |
| | | | Subtotal | 3,599,650 | (54) |
| Gateway Centre | Office | 1,450,000 sq.ft. | 1.38/sq.ft. | 2,001,000 | 30 |
| | Commercial | 750,000 sq.ft. | 1.38/sq.ft. | 1,035,000 | 16 |
| | | | Subtotal | 3,036,000 | (46) |
| Totals | | | | 6,635,650 | 100 |

SOURCE: Wagstaff and Brady

(a) Source: Tables 3 and 4.

(b) California State Energy Commission.⁷

Table 54
ESTIMATED TRANSPORTATION ENERGY CONSUMPTION FOR THE PROPOSED
PROJECTS

| <u>Proposed Projects</u> | |
|---|-----------|
| Trips: Per Day | |
| Workday (a) | 57,000 |
| Weekend/Holiday (b) | 27,400 |
| Average Trip Distance (c) | 9.7 miles |
| Vehicle Miles Per Day (000's) | |
| Workday | 552,900 |
| Weekend/Holiday | 265,780 |
| Average Energy Consumption Per Vehicle (d) | 16.4 mpg |
| Daily Energy Consumption (gal.) | |
| Workday | 33,710 |
| Weekend/Holiday | 16,210 |
| Annual Energy Consumption (million gallons) (e) | |
| Workdays | 7.5 |
| Weekends/Holidays | 2.3 |
| Total Annual Fuel Consumption (million gallons) | 9.8 |
| Energy Value of Total Annual Fuel Consumption (million therms) | 13.2 |

SOURCE: Wagstaff and Brady.

(a) Includes total trips per day for all uses. Source: CH2M HILL.

(b) Includes total trips per day for all uses minus office uses, which are workday activities only. Source: CH2M HILL.

(c) Wagstaff and Brady, calculations based on data from CH2M HILL.

(d) George S. Nolte and Assoc.⁶

(e) Total number of annual workdays assumed to be 223; weekends/holidays 142

Table 55
ESTIMATED CONSTRUCTION-RELATED ENERGY CONSUMPTION FOR BUILD-OUT OF PROPOSED PROJECTS

| Project | Land Use Designation | Area (acres)(a) | No. of Units(a) | Estimated Floor Space (sq.ft.)(a) | | Estimated Energy Consumption (Therms (b)) |
|------------------|----------------------|-----------------|-----------------|-----------------------------------|---------------|---|
| | | | | Per Unit | Total | |
| Natomas Eastside | | | | | | |
| | Office | 106 | -- | -- | 1.90 million | 19 million |
| | Commercial | 31 | -- | -- | 0.23 million | 2.3 million |
| | Residential | 21 | 468 | 1,200(c) | 0.56 million | 5.6 million |
| | Fire Station | 1.5 | -- | -- | 0.005 million | 0.05 million |
| | | | | | | <u>Subtotal</u> 26.95 million |
| Gateway Centre | | | | | | |
| | Office | 75 | -- | -- | 1.45 million | 14.5 million |
| | Commercial | 10 | -- | -- | 0.75 million | 7.5 million |
| | | | | | | <u>Subtotal</u> 22.00 million |
| Totals | | | | | | <u>48.95 million</u> |

SOURCE: Wagstaff and Brady.

(a) Tables 3 and 4 (Project Description tables).

(b) It is assumed that about 10 therms per square foot of structure would be used to fabricate and transport materials to the site, and to construct the buildings (Goldstein and Rosenfeld⁹).

(c) Assumed average residential unit floor space.

The types of measures listed below should be considered for inclusion in the set of standards:

- (a) Define and protect solar access for each building.
- (b) Design individual buildings and site plans for optimum solar orientation in consideration of both passive and active solar energy systems.
- (c) Situate major interior living (Natomas Eastside) areas adjacent to south-facing glazing for maximum winter heat gain.
- (d) Design structures with sufficient glazing on the south side to maximize solar heat gain and offset winter heat loss.
- (e) Provide summer shading of south-facing glazing, such as roof overhangs, arbors, and awnings.
- (f) Shade hard surfaces--including structures, walks, streets, drives, and parking lots--to minimize heat gain of surfaces and transmission to surrounding spaces, without interfering with design features for summer ventilation.
- (g) Plant deciduous trees with appropriate canopy heights and other plantings along glazed, exposed building elevations to provide sun-screening in the summer and filtered sun in the winter.
- (h) Reduce the need for central air conditioning in the summer through passive measures, including:
 - extra ceiling insulation (R-30)
 - attic and crawl space ventilation
 - shading of east, west, and south windows, and east and west walls in summer
 - operable windows that allow for ventilation of living and working areas
- (i) Install solar water heating systems and active solar space heating systems in residential and business park structures.
- (j) Require periodic energy-use audits by PG&E of business park tenants to identify any wasteful consumption practices and opportunities for substantial energy use reduction.
- (k) Designs of structures could provide for maximum use of natural light through optimum placement of windows and skylights, and through provision of light-colored ceiling and wall surfaces.
- (l) Plans for outdoor lighting should include considerations for an optimal balance between public safety and security requirements and energy conservation.
- (m) Specifications for structures should also include such features as:

- water heater insulation sleeves;
- fluorescent lighting in offices and work areas, and in selected residential spaces such as kitchens, bathrooms, garages, and service areas;
- weather stripping of doors and applicable windows;
- electric ignition devices in furnaces and other gas appliances; and
- clock thermostats.

4. REFERENCES

¹ D. B. Goldstein and A. H. Rosenfeld, Conservation and Peak Power Cost Demand, California State Energy Commission, 1975.

² Ibid.

³ Ibid..

⁴ City of Sacramento. South Natomas Community Plan, February, 1978.

⁵ Goldstein and Rosenfeld, op. cit.

⁶ George S. Nolte and Associates, Final EIR for the Menlo Industrial Center, Menlo Park, CA, April, 1979.

⁷ Goldstein and Rosenfeld, op. cit.

⁸ George S. Nolte and Associates, op. cit.

⁹ Goldstein and Rosenfeld, op. cit.

O. VEGETATION AND WILDLIFE

The South Natomas Community Plan EIR includes general assessments of plan impacts on biotic resources and recommends a set of impact-reducing planning policies.¹ The following assessment of project impacts on vegetation and wildlife is based on information in the SNCP EIR, plus field visits and interpretation of site aerial photography.

I. SETTING

a. Vegetation

Four types of vegetation cover the site: agricultural, grassland, riparian, and woodland.

(1) Agriculture. Agricultural cover, both dryland and irrigated, is the predominant vegetative type on the project sites and the South Natomas community as a whole. Although clean-cultivated fields have little wildlife habitat value, irrigation canal margins, levees, and fallow fields are noted in the plan EIR as important sources of water, food, and cover for wildlife.

(2) Grasslands. There are no natural grasslands on the sites. However, dryland grass crops, including grain, hay and forage crops, provide a habitat similar to grassland.

(3) Riparian. Riparian habitats consist of uncultivated vegetation along watercourses, including willow, California blackberry, mugwort, wild rose, and laurel. The only watercourse on the sites with distinct riparian characteristics is the Natomas Main Drainage Canal, which forms the western edge of the Natomas East-side project site.

(4) Woodland. Habitat types not mentioned in the SNCP EIR which are present on the south of the Gateway Centre site are open and dense woodlands consisting of large oaks and laurels. These woodlands were part of the American and Sacramento river riparian habitats. However, construction of levees and the Garden Highway has isolated the woodlands from the rivers and has disrupted direct, sheltered access to the rivers for terrestrial wildlife.

b. Wildlife

(1) Common wildlife species associated with agricultural habitats include pheasant, western meadowlark, ground squirrel, and dove.

(2) Grassland habitats provide food and space for small animals, including house-mouse, black-tailed rabbit, California ground squirrel, and pocket gopher. These animals, in turn, provide food for larger carnivores--including red-tailed hawk and American kestrel--which inhabit adjacent riparian areas.

(3) In addition to wildlife associated with the other habitat types, riparian areas support a wide diversity of resident species including belted kingfisher, rufous-sided towhee, skunk, raccoon, and giant garter snake, plus migratory waterfowl.

c. Rare and Endangered Species

The giant garter snake is the only rare animal sighted in the immediate vicinity. The snake, which is dependent on permanent waterbodies, has been sighted in the Natomas Main Drainage Canal.

An animal that has been classified endangered and has been sighted in the general South Natomas area is the American peregrine falcon. The range of the endangered Southern bald eagle includes the South Natomas area, but no specimen has been sighted.

2. IMPACTS

a. Impacts Addressed in the South Natomas Community Plan EIR

Areawide wildlife and vegetation impacts identified in the SNCP EIR which remain applicable to the proposed projects include:

- (1) Substantial losses of agricultural and grassland habitats, along with adverse changes in species populations and diversity;
- (2) Potential for replacement of natural riparian vegetation with species introduced as urban landscaping;
- (3) Riparian vegetation removal for maintenance of the Natomas Main Drainage Canal channel and other development-related activities;
- (4) Potential destruction of mature trees; and
- (5) Alterations to the riparian habitat of the giant garter snake.

b. Project-Specific Impacts

(1) Potential Removal of Mature Trees. Buildings and parking areas shown on the south end of the Gateway Centre conceptual plan (Figure 4) would, if constructed as shown, be situated among the mature oak and laurel trees on the site. The locations, areas, and configurations of the buildings and paved areas would require removal of a number of trees.

(2) Natomas Eastside Lake. The Natomas Eastside land use plan includes a lake, as shown in Figure 3. The City Water and Sewer Division (CWSD) objected to the lake during preliminary review of the project³ because it regards the element as:

- A wasteful use of groundwater pumped from an onsite well;
- A wasteful use of electricity for well-pumping;

- A consumer of algicides; and
- A safety risk for "minors and inebriates."⁴

In addition to the CWSD concerns, lake construction may result in other impacts. Although lakes of this type have aesthetic and wildlife value, they can also create slight nuisance and health problems related to odors, insect vectors, and waterfowl botulism. Contributing factors to these problems are lake design characteristics and maintenance procedures.⁵

3. MITIGATION MEASURES

a. Applicable SNCP EIR Mitigation Measures

South Natomas Community Plan EIR mitigation measures for areawide vegetation and wildlife impacts applicable to the proposed projects include:

- (1) Designation of the Natomas Main Drainage Canal as a parkway;
- (2) Maximum effort within parkways to preserve natural riparian habitats and guide revegetation in keeping with naturally-occurring species;
- (3) Adoption of an ordinance to protect mature trees; and
- (4) Distribution of information on the giant garter snake so that householders will be encouraged not to harm them.

b. Project-Specific Mitigation Measures

More specific mitigation measures implicit in the general measures listed above include some of the following:

- (1) Provide a landscaped riparian parkway along the main drainage canal frontage of the Natomas Eastside project.
- (2) Require landscape designs for the canal-frontage parkway to include an emphasis on native and related riparian species in compatible combination with improvements for active public use (bikeways, paths, etc.).
- (3) Require preservation of mature trees having trunks 12 inches or greater in diameter measured at a point 12 inches above the ground surface; this measure may require a revised design for the south end of the Gateway Centre project.
- (4) Require that the applicant for the Natomas Eastside project consult with the California Department of Fish and Game to develop appropriate signs and other interpretive materials on giant garter snakes and local wildlife for inclusion as improvements in the canal-frontage parkway.
- (5) Approval of the proposed Natomas Eastside lake should be conditioned upon the following measures:

- The lake should be deep with relatively steep banks and long-radii shore curves to prevent small, shallow areas where waterfowl could congregate and vectors could breed;
- A water circulation/aeration system should be designed, operated, and maintained to prevent stagnation;
- Landscaping suited for cover should be planted at the edges of the lake to attract wildlife;
- Long-term maintenance measures should include the introduction of algae- and larvae-eating fish and mechanical removal of algae blooms;
- Regular inspections should be made by maintenance personnel for removal and incineration of dead animals in and near the lake; and
- Reporting procedures should be established to notify the Sacramento County Health Department and California Department of Fish and Game of any multiple waterfowl deaths.

c. Construction-Period Measures

- (1) Require specific provisions in the applicants' grading and construction plans to protect root systems of mature trees during construction, including prohibitions against grading, excavation, trenching, or paving within driplines.
- (2) Require that contractors are not to harm snakes intentionally during construction.

4. REFERENCES

1. City of Sacramento. Draft and Final Environmental Impact Report for South Natomas Community Plan, November 1977 and February 1978.
2. Ibid.
3. Clif Carstens. Memorandum, re: "The Scope of the EIR for South Natomas Business Parks," prepared for the Sacramento City Planning Commission, by Sacramento City Planning Department, 1980.
4. Ibid.
5. Wagstaff and Brady, Draft Environmental Impact Report for the Old Adobe/ Frates Ranch Project, Petaluma, California, prepared for the City of Petaluma, April, 1981.
6. Ibid.

P. ARCHAEOLOGY

1. SETTING

a. Recent Surveys

An archaeological reconnaissance of the SNCP area was conducted by staff from the Sacramento State University Archaeological Study Center during November and December of 1978.¹ The investigation identified noteworthy on-site surface materials and related potentials for archaeological impact. The study also determined that, since historical land use activities on the project sites have disturbed ground surfaces over time, only excavation can reveal further archaeological artifacts, if present.²

b. Recorded Sites

A records search revealed that there are at least 4 recorded archaeological sites in the South Natomas vicinity; none are on the proposed project sites. The closest is less than one-half mile to the southeast across I-5.

c. Field Reconnaissance

In addition to the records search, field inspections revealed ceramic shards (small pieces) at two locations on the Natomas Eastside site; the fragment at one of these locations had potential for minor historical significance related to ceramic importation from Hong Kong in the 1880's. According to the field investigator, "vast quantities of this pottery type were imported in the late 1800's for sale as inexpensive competitors of American utility ware".³ The materials were found in fields that have been systematically disturbed by agricultural activity for many years. Neither of the discovery sites warranted recording.

2. IMPACTS

a. Potentials for Discovery

The author of the 1978 report stated that no archaeologically-significant cultural materials were observed on the project sites or elsewhere in the SNCP area that could be impacted directly or indirectly by development.⁴ However, the report noted that since the 1978 reconnaissance was limited to surface investigations, potentials remain for discovery of subsurface cultural deposits during construction activities.⁵

3. MITIGATION MEASURES

a. Discoveries During Construction. If any subsurface cultural deposits are discovered during construction, the 1978 report indicated that the following measures should be taken immediately:

- (1) Cease all work within 100 metres of the discovery site;
- (2) Arrange for a qualified archaeologist to determine the historical or prehistorical significance of the discovery site; and
- (3) Complete any mitigation measure prescribed by the archaeologist prior to resumption of work.⁶

4. REFERENCES

¹ Steven B. Dondero, An Archaeological Reconnaissance of the South Natomas Area for the South Natomas Community Plan, Sacramento County, California, prepared for the Sacramento City Planning Department; Sacramento State University Archaeological Study Center, December 1978.

² Ibid.

³ Ibid.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

Q. ALTERNATIVES TO THE PROPOSED ACTION

I. PURPOSE AND APPROACH

To provide more information upon which to base an official response to the proposed changes in South Natomas area land use, this section provides a comparative evaluation of 5 alternatives to the proposed action. The alternatives, as defined by the Sacramento City Planning Department, are diagrammed in Figure 22 and characterized in Tables 56 through 63 in terms of comparative changes in land use and related population, employment, and housing characteristics for a fixed comparison area. The comparison area is limited to lands subject to changes in use with one or more of the 5 alternatives. The area includes the 2 project sites, plus the northwest quadrant between the drainage channel, I-880, and West El Camino Avenue. The alternatives are summarized below. They include:

- a. No Project. Develop Natomas Eastside and Gateway Center sites in conformance with current SNCP policies.
- b. I-5 Frontage. Develop both sites with continuous office frontage along I-5, I-880, and Garden Highway, plus the same number of residential units and neighborhood commercial land uses as proposed under the SNCP.
- c. I-880 Frontage. Develop Gateway Centre site in conformance with current SNCP policies. Develop Natomas Eastside site and adjacent northwest quadrant to the west (between canal, I-880 and West El Camino Ave.) with continuous office frontage along I-880 and most of I-5; and with highway-neighborhood commercial along remaining I-5 frontage; plus internal residential land uses.
- d. I-880 Northwest Quadrant. Develop Natomas Eastside and Gateway Centre sites in conformance with current SNCP. Develop I-880 northwest quadrant with offices.
- e. North Natomas. Allow development of offices on a North Natomas site (south-east quadrant of Del Paso Road/I-5 interchange). Develop Natomas Eastside, Gateway Centre, and other South Natomas sites in conformance with current SNCP policies.

2. SUMMARY COMPARISON

The comparative effects of each of the 5 alternatives are described below in terms of impact factors emphasized in this report.

- a. Principle Characteristics of Each Alternative. Table 57 summarizes the comparative changes in basic planning area characteristics--land use, households, population, and employment--associated with each alternative.

b. Comparative Impacts. Table 56 provides a comparative summary of the effects of each alternative in terms of major impact categories. Tables 57 through 64 show "comparison area" data for each alternative shown in Figure 22.

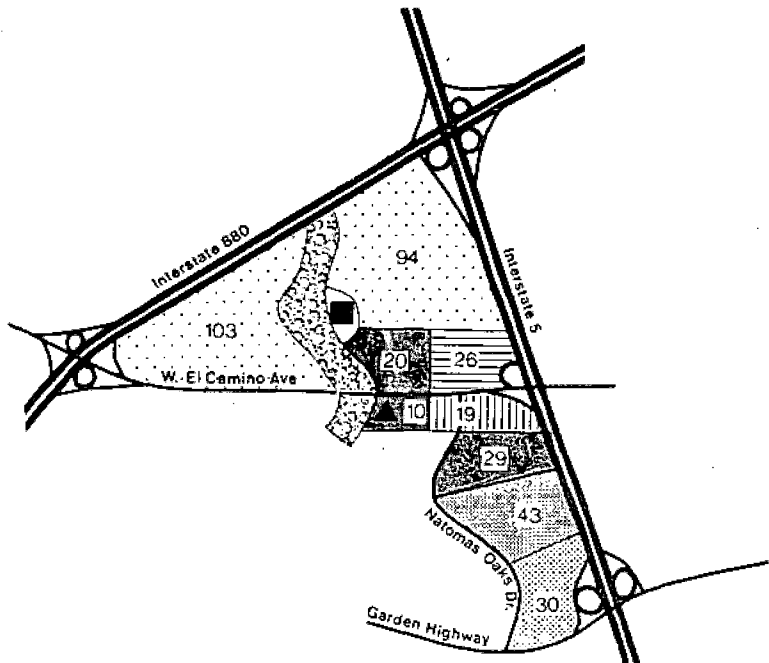
Generally, the 1-5 frontage alternative would provide 2.2 million sq.ft. of office (1.2 million square feet less than the projects) and around 10,480 jobs in the South Natomas planning area, (5,390 fewer than the projects), but would displace only 295 housing units, considerably less than the 1,787 affected by the projects and lowest of the South Natomas office space alternatives. This lower level of displacement would require little mitigation in terms of increased residential densities elsewhere.

The 1-880 frontage alternative would provide 2.8 million sq.ft. of office (0.4 million sq.ft. less than the projects) and roughly 11,480 jobs in South Natomas (4,390 fewer than the projects), but would displace considerably fewer housing units (4,390 vs. 1,787).

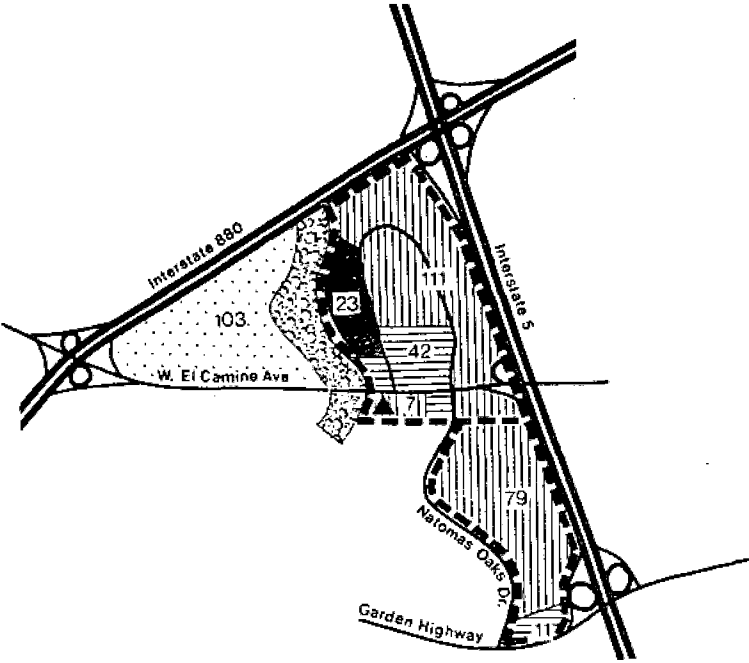
The northwest quadrant alternative would provide 1.9 million sq.ft. of new office in South Natomas (1.5 million sq.ft. less than the projects). Around 615 housing units would be displaced, roughly a third of the projects' effect. 7,860 onsite jobs (8,010 less than the projects) would be created.

The North Natomas alternative would provide 13,500 jobs and 3.35 million sq.ft. of office space in the north area, with the South Natomas community remaining as currently planned, or a total of 4.2 million square feet of office and 16,250 jobs. South Natomas would remain as the closest residential area to the new jobs and demand for the community's housing would still be affected, although there would be no displacement. The noncontiguous, remote location of the North Natomas site would require an inefficient and growth-inducing extension of municipal services. Sewer extension costs could reach \$14 to \$20 million (today's dollars).* Additional police costs alone would create a negative annual cost-revenue flow.

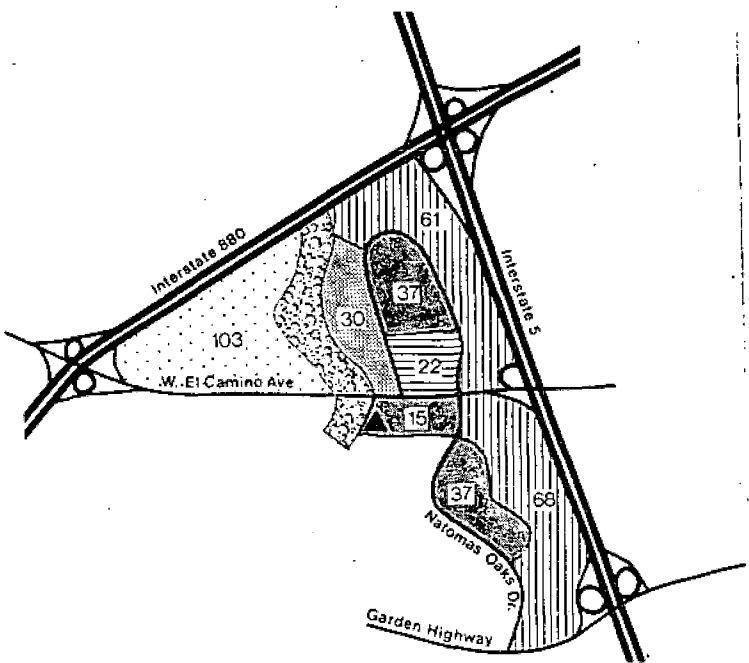
* Douglas Frederick, City of Sacramento Public Works Division, 1981.



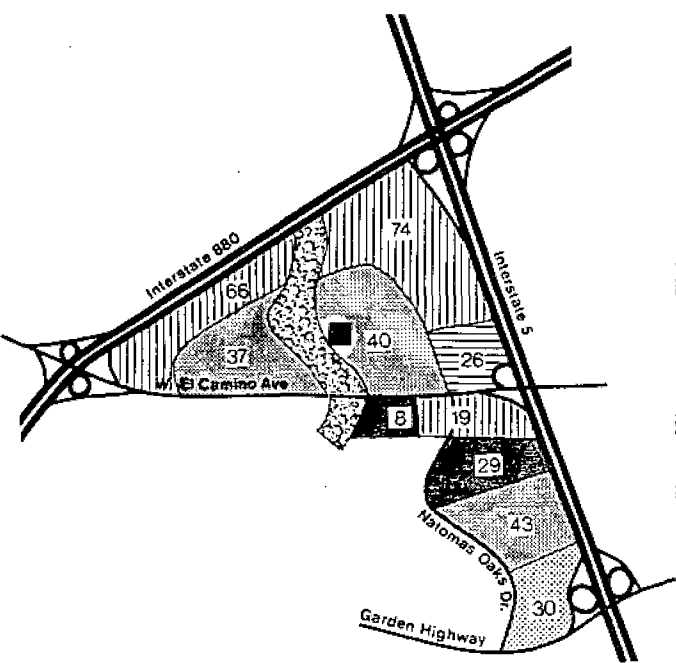
ALTERNATIVE 1: NO PROJECT
1978 SOUTH NATOMAS COMMUNITY PLAN
(1981 ESTIMATES)



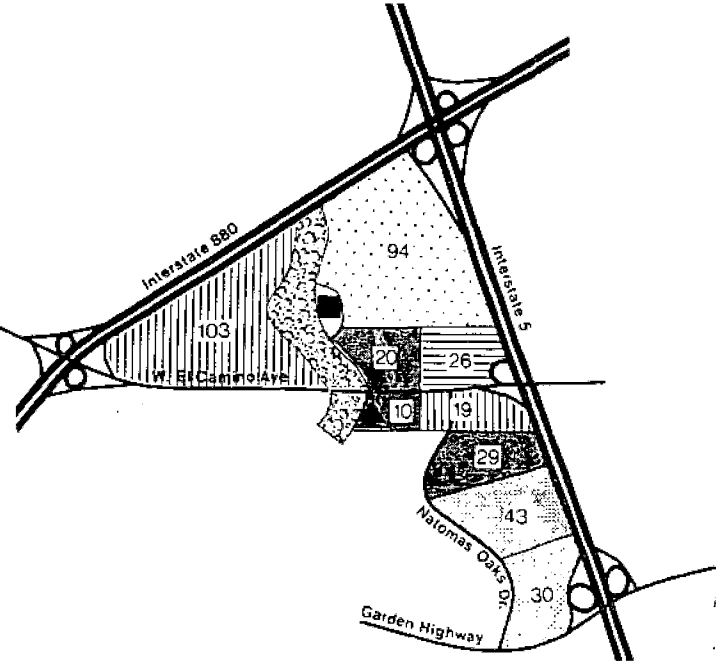
PROPOSED ACTION



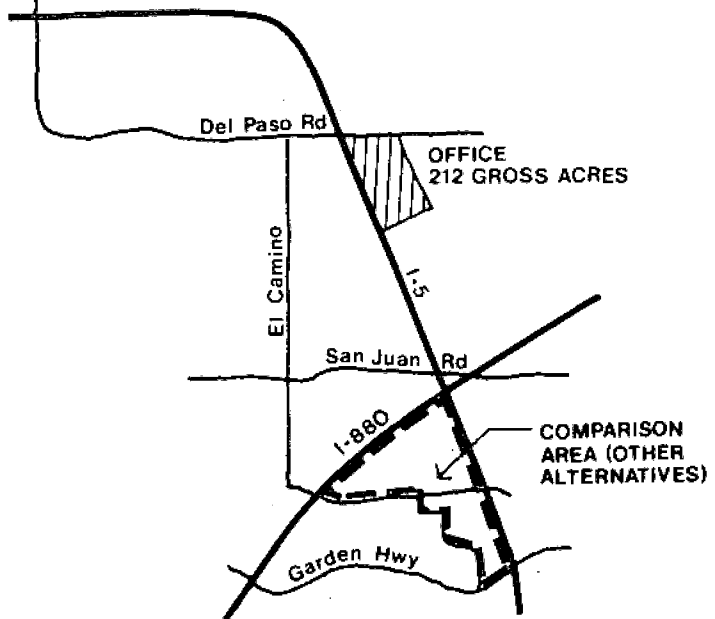
ALTERNATIVE 2: I-5 FRONTAGE



ALTERNATIVE 3: I-880 FRONTAGE



ALTERNATIVE 4: NORTHWEST QUADRANT



ALTERNATIVE 5: NORTH NATOMAS

- (Average Density)
- RESIDENTIAL (7)
 - RESIDENTIAL (9)
 - RESIDENTIAL (11-12)
 - RESIDENTIAL (22-23)
 - OFFICE
 - COMMERCIAL
 - SCHOOL
 - FIRE STATION
 - PARK
 - 66 GROSS ACRES

FIGURE 22
PROJECT
ALTERNATIVES

Table 56 SUMMARY OF COMPARATIVE IMPACTS -- PROJECT ALTERNATIVES

| IMPACT CATEGORY | NO PROJECTS | PROJECTS | I-5 FRONTAGE | I-880 FRONTAGE | NW QUADRANT | NORTH NATOMAS |
|---|--|---|---|--|---|--|
| SOUTH NATOMAS LAND USE | Res'l use emphasis 21,700 dus (2,949 ac) 5.6 million s.f. of office (352 ac) 0.8 million s.f. of comm'l (117 ac) Res'l uses exposed to I-5, I-880, and Garden Hwy Compatible with CBD goals | Creates office-res'l mix Loss of 1787 dus (from "no projects") +2.8 million site of office (+180 ac) +70,000 s.f. of comm'l (+11 ac) Res'l uses buffered from I-5, but exposed I-880 Some conflict with CBD goals | Creates office-res'l mix Loss of 290 dus (from "no project") +1.4 million sq. ft. of office (+127 ac) Little change in comm'l (-4 ac) Res'l uses buffered from I-5 and I-880 Little conflict with CBD goals | Office-res'l mix Loss of 440 dus (from "no project") +1.5 million s.f. of office (+128 ac) No change in comm'l Res'l uses buffered from freeways by office devel. Little conflict with CBD goals | Office-res'l mix (54/28%) Loss of 616 dus (from "no project") +1.3 million s.f. of office (+84 ac) No change in comm'l No buffering Less freeway frontage for offices Little conflict with CBD goals | Office space shifted to North Natomas Same res'l emphasis in SN area 212 acre office node @ North Natomas Demand for SN housing (closest area) still affected Non-contiguous, inefficient, growth-inducing extension of infrastructure Some conflict with CBD goals |
| SOUTH NATOMAS POPULATION AND HOUSING | 21,700 dus @ buildout 54,300 pop. @ buildout SN area cap = 15.1% of proj. city hsg. growth, 1980-95 | 19,913 dus (-8.2%) 49,780 pop. at buildout SN area cap. = 13.8% of proj. city hsg. growth, 1980-95 | 21,400 dus (-1.4%) 53,510 pop. (loss of 790) SN area cap. = 14.9% of projected city hsg. growth, 1980-1995 Housing cost reductions thru higher densities | 21,190 dus (-2.0%) 52,990 pop. @ buildout SN area cap. = 14.7% of proj. city hsg. growth, 1980-95 Housing cost reductions thru higher densities | 21,080 dus (-2.8%) 52,700 pop. @ buildout SN area cap = 14.6% of proj. city hsg. growth, 1980-1995 | No displacement in SN area Increased hsg pressure in NN |
| SOUTH NATOMAS EMPLOYMENT | Total SN area direct jobs = 7,150 or 1.0% of proj. SMSA job total | Total SN area direct jobs = 20,650 (+13,500) or 2.8% of proj. 1995 SMSA ttl. | No sign. change in labor market impacts from projects Total SN area direct jobs = 15,330 (+8,170) or 2.1% of proj. 1995 SMSA ttl. Fewer "new jobs" attracted to region | Less effect on labor market than projects Total SN area direct jobs = 16,330 (+9,170) or 2.2% of proj. 1995 SMSA job total Fewer "new jobs" attracted to region | Job effects similar to projects total SN area direct jobs = 12,710 (+5,550), or 1.7% of proj. 1995 SMSA job total | Total SN area direct jobs = 7160 NN area direct jobs = 13,500 Total direct jobs = 20,660 or 2.8% of proj. 1995 SMSA job total |
| SOUTH NATOMAS TRAFFIC | 503,000 ADT Unacceptable LOS at 1 intersection, severe at none | 572,400 ADT (+69,400 trips) = 13.8% increase Unacceptable LOS at 4 intersections, severe at 4 | 517,730 ADT (-14,730 trips) = 2.9% decrease Unacceptable LOS at 4 intersections, severe at 3 | 538,180 ADT (+35,180 trips) Unacceptable LOS at 5 intersections, severe at 4 | 526,060 ADT (+23,060 trips) Unacceptable LOS at 4 intersections, severe at 4 | 503,000 ADT for SN area +56,180 ADT for NN Unacceptable LOS at 3 intersections, severe at 2 |
| PUBLIC SERVICES AND FISCAL | One fire station req'd on project sites No major effect on police costs Water and sewer cap. may be exceeded Drainage adequate One elem. school req'd on project sites | One fire station req'd on project sites (i.e. no difference) No sig. effect on police costs Need for parks reduced (-4550 pop.) Need for schools reduced by one \$195,000/yr. more than "no projects" in net cost-revenue surplus | No sig. difference in police/fire needs Less water/sewer use than "no projects" Increase in drainage costs Need for parks and schools space Less than "no projects" (-740 pop.) \$120,000/year more than "no projects" in net cost-revenue surplus | Need for parks and school space less than "no projects" (-1100 pop.) No sig. difference in police/fire needs Increases in drainage costs Less water/sewer use than "no projects" \$215,000/yr. more than "no projects" in net cost-revenue surplus | Need for prks and school space less than "no projects" (-1100 pop.) No sig. difference in police/fire needs Less water/sewer use than "no projects" Increases in drainage costs \$110,000/yr. more than "no projects" in net cost-revenue surplus | No direct effect on park and school expenditures Sig. add'l fire costs Add'l police costs Sewer service extension cost = \$10-15 million plus \$4 million EPA fine Annual costs would exceed services |
| AIR | Emissions will be well under fed. or state max. standards | Slight increases in local CO levels, well below fed. and state standards 28% increase in SN area gross emission over "no projects" = 2-3% increase in reg'l airshed emissions | Local effects similar to projects Slightly less reg'l emissions than projects | Local effects similar to projects Slightly less reg'l emissions than projects | Local effects similar to projects Slightly less reg'l emissions than projects | Lowest local impact Slight increase in reg'l omissions |
| NOISE | Traffic noise will exceed city standards along major local routes Sound walls or berms req'd | No noticeable increase over "no project" roadside noise levels Roadside noise "conditionally acceptable" at office frontage on I-5 | Sign. less local impact than projects Negligible reduction in community impacts | Local impact sig. less than projects Negligible reductions in community impacts | Local impact sig. less than projects Slight reductions in community noise levels | No change in SN area Noticeable change at NN, but no impacted uses |
| ENERGY | Transp. energy use = 7.0 million therms/yr. Total energy use = 11.1 million therms/yr. | Transp. energy use = 13.2 million therms/yr. Total energy use = 19.8 million therms/yr. = 13% more than "no projects" | 7% less transp. energy use than projects Overall 15% less energy use than projects | 10% less transp. energy use than projects Overall 17% less energy use than projects | 68% less transp. energy use than projects Overall 69% less energy use than projects | 45% less trans. energy use than projects Overall 44% less energy use than projects |

3. NO PROJECT ALTERNATIVE

a. Principal Characteristics

Basic characteristics of "no project" alternative are shown in Table 59. The table indicates "comparison area" buildout characteristics of if current SNCP policies stay in effect. (See Figure 22.)

Plan would emphasize residential use of comparison area (84 percent of net area). Other uses would include neighborhood and highway-serving commercial (7 percent), offices (5 percent), school (3 percent), and fire station (0.2 percent).

b. Land Use Impacts

No change in current land use policy for the area, i.e. no reduction in residential land use, no increase in office use, no project-related additional interest in business park development on other Natomas area lands, no adverse effects on CBD.

c. Population and Housing Impacts

(1) Two project sites will accommodate 2,250 housing units (5,640 people) at build-out.

(2) South Natomas community would ultimately accommodate 17,100 additional housing units (42,750 additional people) over 1980 levels.

(3) South Natomas community would accommodate roughly 15.1 percent of total city housing growth between 1980 and 1995.

d. Employment Impacts (see Table 59)

(1) Two project sites will provide 2,310 direct jobs, or less than one percent of projected 1980-1995 regional (SMSA) job growth.

(2) South Natomas community will provide 7,161 jobs, less than 1.0 percent of total 1995 Sacramento labor market area (SMSA) employment.**

e. Traffic Impacts at Buildout

(1) Comparison area will generate roughly 57,350 average weekday trips (ADT) (Table 65).

(2) South Natomas community will generate roughly 503,000 ADT (Table 24).

(3) Peak hour levels-of-service (Table 66) would exceed "C" (city's acceptable level) at one intersection (AM/PM)--1-5 Southbound offramp/Garden Hwy (B/D).

* 1980 household and population totals for the South Natomas community were 4,600 and 12,230, respectively (Table 15, here).

** Estimated 1995 employment based on continuation of 1976-1985 growth rates from Table 36, is 725,000.

f. Public Service and Fiscal Impacts

- (1) An additional fire station and company would be required in the area.
- (2) Plan would not have major effect on police capital expenditures.
- (3) All major on-site infrastructure would be funded by developers (assessment districts, onsite preparation costs, etc.).
- (4) Buildout may exceed service capacities of water and sewer trunk and interceptor lines "downstream."
- (5) Runoff increases would be within local drainage system capacities (drainage channel, pump station).
- (6) Comparison area residential buildout would require additional elementary school.

g. Air Resources Impacts

Federal and state air pollution emission standards for ozone and carbon monoxide, the two critical ("non-attainment") contaminants in Sacramento airshed, would not be exceeded in area during next 20 years.

h. Noise Impacts

- (1) Full development would increase traffic-generated noise levels along I-5, I-880, and on internal arterials and collector streets.
- (2) City noise standards would be exceeded along many roadway segments within SNCP area.
- (3) Mitigation measures such as sound walls or berms required where standards are exceeded.

i. Energy Impacts

- (1) Electrical energy consumption for South Natomas would reach 178,400 million Btus per month at buildout (SNCP EIR, Table XVI-1).
- (2) Natural gas consumption for South Natomas would reach 2,130 million Btus per month at buildout (SNCP EIR, Table XVI-2).
- (3) Transportation fuel consumption for South Natomas would reach 132,600 Btus per month at buildout (SNCP EIR, Table XVI-3).

4. I-5 FRONTAGE ALTERNATIVE

a. Principal Characteristics

Basic comparison area characteristics for I-5 frontage scenario are shown in Table 60..

Alternative would emphasize balance between residential and office uses, increasing office use to 40 percent of net comparison area (vs. 5 percent under current plan). Offices concentrated along I-5 frontage. Residential uses (53 percent) contained behind offices and in northwest quadrant. Neighborhood commercial area (6 percent) and fire station site also included.

b. Land Use Impacts

- (1) Similar to projects, overall effect would be to change South Natomas west side land use from single-purpose residential to mixed-purpose residential-office area.
- (2) By allocating more land to higher density housing types, South Natomas area would retain role as housing concentration near central city (loss of 295 dus or within 1.4 percent of plan total for South Natomas).
- (3) City's office-commercial vacant land supply increased by 1.7 percent.
- (4) Accommodation of office land use would increase interest in additional business park development in other Natomas areas.
- (5) Office land in "comparison area" (Figure 22) could accommodate 2.17 million sq.ft. of floor space, 1.1 million less than with the projects, resulting in a more reasonable penetration rate and lower potential for significant effect on CBD and other suburban office developments.
- (6) Commercial area would be residential- and office-serving with little freeway orientation.
- (7) Residential uses on Natomas Eastside and Gateway Centre sites buffered from I-5, I-880, and Garden Hwy by office uses.

c. Population and Housing Impacts

- (1) Project site would accommodate 2,148 housing units (5,370 people) at buildout.
- (2) "Comparison area" would accommodate 2,575 housing units (6,440 people) at buildout.
- (3) South Natomas Community Plan would ultimately accommodate 16,805 additional housing units (41,280 additional people) over 1980 levels.
- (4) South Natomas Community Plan would accommodate roughly 14.9 percent of total city housing growth between 1980 and 1995, i.e. nearly same as no project alternative.

d. Employment Impacts

- (1) The two project sites would provide 10,500 direct jobs or 3.8 percent of projected 1980-1995 regional (SMSA) job growth.
- (2) Similarly, the comparison area would also provide 10,500 direct jobs.
- (3) South Natomas community would provide 15,330 direct jobs, roughly 2.1 percent of total projected 1995 Sacramento area (SMSA) employment.

e. Traffic Impacts

- (1) Roughly 54,702 fewer average daily trips generated than with two projects (see Table 65).
- (2) Comparison area traffic generation reduced by 43 percent.
- (3) Community planning area traffic generation decreased by 9.6 percent.
- (4) Peak hour levels-of-service (Table 66) would still exceed acceptable levels at four intersections (AM/PM):
 - Natomas Oaks Dr/W. El Camino (F/F)
 - I-5 Northbound offramp/W. El Camino (D/B)
 - Natomas Oaks Dr/Garden Hwy (E/F)
 - I-5 Southbound offramp/Garden Hwy (F/F)

f. Public Service and Fiscal Impacts

- (1) With displacement of 790 people, need for parks reduced by 3.5 acres, saving municipal development costs of \$95,000 and annual maintenance expenditures of \$17,800.
- (2) Produces \$1.9 million more than current plan in one-time fees and taxes, compared to \$1.75 million for two projects.
- (3) Produces \$85,000 more than current plan in annual tax revenues, compared to \$195,000 for two projects.
- (4) Produces \$120,000 more than current plan in net annual cost-revenue surplus, compared to \$295,000 increment for combined projects.

g. Air Resources Impacts

- (1) Differences between alternative and projects in local air quality effects are negligible.

(2) VMT generated by alternative would produce slightly less emissions to Sacramento Valley airshed than would projects.

h. Noise Impacts

(1) Reductions in VMT in comparison to projects would result in significant reductions in nearby traffic noise impacts, but negligible reductions in community noise impacts.

i. Energy Impacts

(1) Requires approximately 32 percent less energy than proposed projects to operate per year (see Table 73).

(2) Requires roughly 7 percent less energy than projects for transportation purposes (see Table 74).

(3) Overall, long-term annual energy consumption for operation and transportation about 15 percent less than for projects.

5. I-880 FRONTAGE ALTERNATIVE

a. Principal Characteristics

Basic comparison area characteristics of I-880 alternative at buildout are shown in Figure 22 and Table 61.

Land use changes confined to Natomas Eastside and northwest quadrant sites. Gateway Centre site would develop according to current SNCP. Alternative would provide for residential/office balance (57/35 percent) similar to I-5 frontage scenario, but with office frontage along I-880 and northern segment of I-5. Neighborhood and highway-serving commercial uses also included (7 percent).

b. Land Use Impacts

- (1) Similar to projects, overall effect would change South Natomas west side land use from single-purpose residential to mixed-purpose residential-office area.
- (2) Regional scale business park development would be introduced in South Natomas area.
- (3) Through allocation of land to higher density housing types, community's role as residential concentration near central city would be maintained; although total residential units accommodated would decrease by 505 units or 2 percent of community total.
- (4) City's supply of vacant office-commercial land would increase by 1.8 percent.
- (5) Changes in land use would increase interest in additional business park development on Natomas area lands.
- (6) Less potential conflict with CBD improvement goals; office market penetration rate substantially less than proposed projects (2.7 vs. 3.35 million square feet).
- (7) Residential uses in northern areas buffered from freeway impacts (noise, air, visual) by office development.

c. Population and Housing Impacts

- (1) Two project sites would accommodate 1,877 housing units (4,695 people) at buildout.
- (2) Comparison area would accommodate 2,365 housing units (5,920 people) at buildout.
- (3) South Natomas community at buildout would accommodate an additional 16,590 housing units (40,760 more people) over 1980 levels.
- (4) South Natomas community would accommodate roughly 14.8 percent of total city housing growth between 1980 and 1995.

d. Employment Effects

- (1) Two project sites would provide 7,160 direct jobs, or 3.1 percent of projected 1980-1995 regional (SMSA) job growth.
- (2) Comparison area would provide 11,480 direct jobs.
- (3) South Natomas community would provide 16,330 direct jobs, roughly 2.3 percent of projected 1995 Sacramento area (SMSA) employment.

e. Traffic Impacts

- (1) Alternative would generate roughly 34,250 fewer average daily trips than projects (from Table 65).
- (2) Comparison area traffic generation reduced by 27 percent.
- (3) Community planning area traffic generation decreased by 6.0 percent.
- (4) Peak hour levels-of-service (Table 66) would still exceed acceptable levels at five intersections (AM/PM):
 - Natomas Oaks Dr./W. El Camino (F/F)
 - I-5 Northbound offramp/W. El Camino (E/B)
 - Natomas Oaks Dr./Garden Hwy (E/F)
 - Orchard Ln./W. El Camino (F/D)
 - I-5 Southbound offramp/Garden Hwy (F/F)

f. Public Service and Fiscal Impacts

- (1) No significant change in police and fire costs from "no projects."
- (2) With displacement of 440 units (1,100 fewer residents), need for parks reduced by 5.5 acres, reducing municipal development costs by \$150,000 and annual maintenance expenditures by \$27,500.
- (3) Produces \$2.1 million more than current plan in one-time fees and taxes, as compared to \$1.75 million for two projects.
- (4) Produces \$200,000 more than current plan in annual tax revenues, as compared to \$195,000 for two projects.
- (5) Produces \$215,000 more than current plan in net annual cost-revenue surplus, as compared to a \$295,000 increment for two projects.

g. Air Resources Impacts

- (1) Differences between alternative and projects in local air quality effects would be negligible.
- (2) VMT generated by alternative would produce slightly less emissions to Sacramento Valley airshed than would projects.

h. Noise Impacts

- (1) Reductions in ADT in comparison to projects (Table 65) would result in significant reductions in nearby traffic noise, but negligible reductions in community noise effects.

i. Energy Impacts

- (1) Would require about 32 percent less energy per year to operate than would projects (Table 73).
- (2) Would require roughly 10 percent less energy per year for transportation than would projects (Table 74).
- (3) Overall, long-term annual energy use for operation and transportation would be 17 percent less than projects.

6. NORTHWEST QUADRANT ALTERNATIVE

a. Principal Characteristics

Basic comparison area characteristics of I-880 northwest quadrant development scenario are shown in Figure 22 and Table 62.

Alternative would confine land use changes to northwest quadrant of comparison area. Two project sites would develop according to current SNCP plan. By switching use of northwest quadrant from residential to office, alternative would reduce comparison area emphasis on residential to 54 percent of net land area, and would allocate the difference to offices, raising total office allocation to 28 percent. Office frontage would be limited to segments of I-880 and West El Camino Avenue. Commercial, school, and fire station designations would not change from current plan.

b. Land Use Impacts

- (1) Similar to projects, overall effect would change South Natomas west side land use from single-purpose residential concentration to mixed-use residential office area. Unlike projects, I-5 frontage, and I-880 frontage alternatives, this scenario would not maximize freeway frontage (less than half as much frontage as other alternatives).
- (2) Regional-scale business park development would be introduced to South Natomas area.
- (3) Community's role as residential concentration near central city would be slightly reduced (minus 615 housing units, 2.8 percent community decrease).
- (4) City's overall supply of vacant office-commercial land would increase by 2.3 percent.
- (5) Changes in land use would increase interest in additional business park development on other Natomas area lands, although not as much as would more freeway-oriented I-5 and I-880 frontage alternatives.
- (6) Scenario would create significantly less potential conflict with CBD development goals; office market penetration rate substantially less than proposed projects (1.73 vs. 3.35 million sq.ft.).
- (7) Office location on I-880 west of drainage canal would be a disadvantage, reducing downtown and airport access, reducing visibility (more traffic volume on I-5 than I-880), and defeating concept of office-commercial spine between central area and North Natomas.

c. Population and Housing Impacts

- (1) Two project sites would accommodate 2,255 housing units (5,640 people) at build-out.

(2) Comparison area would accommodate 2,255 housing units (5,640 people) at build-out.

(3) South Natomas community at buildout would accommodate 16,485 housing units (40,470 more people) over 1980 levels.

(4) South Natomas community would accommodate roughly 14.5 percent of total city housing growth between 1980 and 1995; i.e. nearly same as "no project" alternative.

d. Employment Impacts

(1) Less overall labor market effects than projects.

(2) Two project sites would provide 2,310 direct jobs, less than 1 percent of projected 1980-1995 regional (SMSA) job growth.

(3) Comparison area would provide 7,860 direct jobs.

(4) South Natomas community would provide 12,710 jobs, 1.8 percent of projected 1995 Sacramento labor market area (SMSA) employment.

(5) Fewer "new jobs" created in region.

e. Traffic Impacts

(1) Alternative would generate roughly 46,370 fewer average daily trips than would the two projects.

(2) Comparison area traffic generation reduced by 40 percent.

(3) Community planning area traffic generation reduced by 9.4 percent.

(4) Peak-hour levels-of-service (Table 66) would still exceed acceptable levels at four intersections (AM/PM):

- Natomas Oaks Drive/West El Camino (F/F)
- Natomas Oaks Drive/Garden Hwy (D/G)
- Orchard Lane/West El Camino (F/E)
- I-5 Southbound offramp/Garden Hwy (E/F)

f. Public Service and Fiscal Impacts

(1) Produces \$1.1 million more than current plan in one-time fees and taxes, as compared to \$1.75 million for two projects.

(2) Produces \$75,000 more than current plan in annual tax revenues, as compared to \$195,000 for two projects.

(3) Produces \$110,000 more than current plan in net annual cost-revenue surplus, as compared to \$295,000 increment for two projects.

g. Air Resources Impacts

(1) Differences between alternative and projects in local air quality effects would be negligible (see Tables 69 and 70).

(2) VMT generated by alternative would produce slightly less emissions to Sacramento Valley airshed than would projects (see Tables 71 and 72).

h. Noise

a. Reductions in ADT in comparison to projects (Table 65) would result in significant reductions in nearby traffic noise, and slight reductions in community noise levels.

i. Energy Impacts

(1) Would require 71 percent less energy per year to operate than would projects (Table 73).

(2) Would require 68 percent less energy per year for transportation than would projects (Table 74).

(3) Overall long-term annual energy use for operation and transportation would be roughly 69 percent less than proposed projects.

7. NORTH NATOMAS ALTERNATIVE

a. Principal Characteristics

Basic development characteristics under North Natomas alternative are shown in Figure 22 and Table 63. Scenario would include no change in comparison area from current SNCP policies, but would designate as office the 212-acre (gross) North Natomas site at southeast quadrant of Del Paso Road/I-5 interchange, in order to provide an alternative location for proposed office projects.

b. Land Use Impacts

- (1) Would shift office space development to North Natomas.
- (2) Would add 181 net acres to city's office land inventory, which would equal the total net acres for office in two projects.
- (3) Would create a non-contiguous, high-access office node in Natomas area; represents an inefficient and growth-inducing extension of infrastructure and city services.

c. Population and Housing Impacts

- (1) No housing provided in local office area.
- (2) South Natomas area remains as closest housing area, so demand for South Natomas housing still affected, although no displacement.
- (3) Increased pressure for housing in North Natomas areas.
- (4) Housing demand impacts may also partially shift toward Woodland and other areas northeast on I-880.

d. Employment Impacts

- (1) No significant changes in labor market impacts of two projects.
- (2) North Natomas site would provide 13,940 direct jobs, or 5.1 percent of projected 1980-1995 regional (SMSA) job growth.
- (3) North Natomas site, in combination with South Natomas community, would provide 21,100 direct jobs, roughly 2.9 percent of projected 1995 Sacramento area employment.

e. Traffic Impacts

- (1) Alternative would result in substantial improvements in intersection impacts over two projects. Number of intersections with unacceptable levels-of-service would be reduced to the three (see Table 70):

- Natomas Oaks Drive/West El Camino (B/E)

- Natomas Oaks Drive/Garden Hwy (D/F)
- I-5 Southbound offramp/Garden Hwy (D/F)

f. Public Service and Fiscal Impacts

- (1) No effect on level of public expenditure for parks or schools.
- (2) Significant additional fire costs, both capital and operating. An additional fire station with equipment would be required, with an annual operating cost of \$450,000 (Table 57).
- (3) Public sewer service is not anticipated in North Natomas area for many years. Extension of sewer service to North Natomas would require investment of \$10-15 million and payment of \$4 million EPA penalty for violating terms of agreement under which the agency contributed major portion of funds for new treatment plant and interceptors.
- (4) Construction excise tax for alternative would be highest at \$2.3 million, since there would be no housing displacement.
- (5) Building permit fees of \$527,000 and sewage connection fees of \$195,000 are highest of five alternatives.
- (6) On basis of operating costs of new fire station alone, additional operating costs would exceed additional revenues (assuming no other development in area to be served by fire company).

g. Air Resources Impacts

- (1) Although differences are negligible, this scenario generates the lowest overall CO values of the five alternatives (Table 69), particularly at receptor 2 (20 percent less than projects), due to land use dispersal.
- (2) Due to VMT increases, a greater amount of CO, NO_x, THC, and SO₂ emissions would be generated (Table 70).

h. Noise Impacts

- (1) No noticeable changes in South Natomas area noise environment.
- (2) Noticeable changes in noise environment at Del Paso Road would result, but significance of impact would be low since there are few surrounding urban uses.

i. Energy Impacts

- (1) Would require roughly 41 percent less energy to operate per year than would projects (Table 73).
- (2) Would require roughly 45 percent less transportation energy per year than projects (Table 74).
- (3) Overall, would require roughly 44 percent less energy per year than projects.

Table 57
COMPARISON OF ALTERNATIVES: BASIC CHARACTERISTICS

| | Number of Dwelling Units | | So. Natomas Land Use Allocation (Gross Acres) | | | | | | | South Natomas Employment | |
|--|--------------------------|----------|---|-------------|--------|--------|--------|-----|-------|--------------------------|-----------|
| | | | Population at Buildout | Residential | Office | Comm'l | | | | | |
| 1978 PLAN ("No Project") ^{a,b} | 21,700 | | 54,300 | 2,949 | 352 | 117 | | | | 7,161 | |
| 1978 PLAN WITH PROPOSED CHANGES ^c | | | | | | | | | | | |
| w/Natomas Eastside only | 21,124 | (-576) | 52,860 | 2,848 | (-101) | 450 | (+98) | 127 | (+10) | 14,450 | (+7,300) |
| w/Gateway Centre only | 20,489 | (-1,211) | 51,200 | 2,847 | (-102) | 431 | (+79) | 117 | (+0) | 13,360 | (+6,200) |
| w/Both projects | 19,913 | (-1,787) | 49,780 | 2,746 | (-203) | 530 | (+178) | 128 | (+11) | 20,650 | (+13,500) |
| ALTERNATIVES ^d | | | | | | | | | | | |
| 1. No Project | 21,700 | (-0) | 54,300 | 2,949 | (-0) | 352 | (+0) | 117 | (+0) | 7,161 | (+0) |
| 2. I-5 Frontage | 21,405 | (-295) | 53,510 | 2,840 | (-109) | 462 | (+110) | 103 | (-4) | 15,330 | (+8,170) |
| 3. I-880 Frontage | 21,190 | (-505) | 52,990 | 2,807 | (-142) | 492 | (+140) | 117 | (+0) | 16,330 | (+9,170) |
| 4. NW Quadrant | 21,085 | (-615) | 52,700 | 2,846 | (-103) | 455 | (+103) | 117 | (+0) | 12,710 | (+5,550) |
| 5. North Natomas | 21,700 | (-0) | 54,300 | 2,949 | (-0) | 352 | (+0) | 117 | (+0) | 7,161 | (+0) |
| -- Outside Planning Area | -- | -- | -- | -- | -- | 312 | (+212) | 0 | (+0) | 13,940 | (+13,940) |
| -- Total | 21,700 | (-0) | 54,300 | 2,949 | (-0) | 564 | (+212) | 117 | (+0) | 21,100 | (+13,940) |

SOURCE: Wagstaff and Brady

^aJuly 1981 estimates by city staff as shown in Table 6, herein (rounded)

^bDifferences calculated from data in Tables 6 and 59

^cDifferences calculated from Table 55 data

^dDifferences calculated from data in Tables 59-63

Table 58

PROPOSED ACTION: COMPARISON AREA BASIC DATA (See Figure 22)

| Comparison Area Land Use | | Net Acres Total(Onsite) | Gross Acres Total(Onsite) | Employees Total(Onsite) | Population Total(Onsite) |
|-------------------------------------|----------------------------------|----------------------------|------------------------------|----------------------------|-----------------------------|
| Residential | Dwelling Units Total(Onsite) | | | | |
| 7 dus/ac ave | 616 (0) | 94 (0) | 103 (0) | | 1,540 (0) |
| 9 dus/ac ave | 0 (0) | 0 (0) | 0 (0) | | 0 (0) |
| 11-12 dus/ac ave | 0 (0) | 0 (0) | 0 (0) | | 0 (0) |
| 22-23 dus/ac ave | 468 (468) | 21 (21) | 23 (23) | | 1,170 (1,170) |
| Subtotals | 1,084 (468) | 115 (21) | 126 (23) | | 2,710 (1,170) |
| Ave. Densities | 11/ac | (22/ac) | | | |
| Business and Professional Office | Million Sq. Ft. Total(Onsite) | | | | |
| Commercial | 3.35 (3.35) | 181 (181) | 199 (199) | 13,940 (13,940) | 0 |
| Schools | .31 (.31) | 41 (41) | 47 (47) | 2,010 (2,101) | 0 |
| Fire Station | -- (--) | 0 (0) | 0 (0) | -- (--) | 0 |
| Subtotals | -- (--) | 1.5 (1.5) | 1.5 (1.5) | -- (--) | -- |
| TOTALS | 3.66 (3.66) | 224 (224) | 248 (248) | 15,870 (15,870) | 2,710 (1,170) |

SOURCE: Wagstaff and Brady

Table 59

ALTERNATIVE I--NO PROJECT: COMPARISON AREA BASIC DATA (See Figure 22)

| Comparison Area Land Use | Dwelling Units Total(Onsite) | | Net Acres Total(Onsite) | | Gross Acres Total(Onsite) | | Employees Total(Onsite) | | Population Total(Onsite) | |
|-------------------------------------|----------------------------------|---------|----------------------------|-------|------------------------------|--------|----------------------------|---------|-----------------------------|---------|
| Residential | 1,058 | (433) | 149 | (61) | 197 | (94) | | | 2,650 | (1,110) |
| 7 dus/ac ave | 199 | (199) | 22 | (22) | 30 | (30) | | | 500 | (500) |
| 9 dus/ac ave | 396 | (396) | 36 | (36) | 43 | (43) | | | 990 | (990) |
| 11-12 dus/ac ave | 1,218 | (1,218) | 54 | (54) | 59 | (59) | | | 3,050 | (3,050) |
| 22-23 dus/ac ave | 2,870 | (2,250) | 261 | (173) | 329 | (226) | | | 7,190 | (5,640) |
| Subtotals | | | | | | | | | | |
| Ave. Densities | 11/ac | | (13/ac) | | | | | | | |
| | Million Sq. Ft. Total(Onsite) | | | | | | | | | |
| Business and Professional Office | .32 | (.32) | 16 | (16) | 19 | (19) | 1,232 | (1,232) | | |
| Commercial | .15 | (.15) | 22 | (22) | 26 | (26) | 1,078 | (1,078) | | |
| Schools | -- | (--) | 9.5 | (9.5) | 10.5 | (10.5) | -- | (--) | | |
| Fire Station | -- | (--) | 1.5 | (1.5) | 1.5 | (1.5) | -- | (--) | | |
| Subtotals | | | 49 | (49) | 57 | (57) | | | | |
| TOTALS | .47 | (.47) | 310 | 222 | 386 | 283 | 2,310 | (2,310) | (7,180) | (5,640) |

SOURCE: Wagstaff and Brady

Table 60

ALTERNATIVE 2--I-5 FRONTAGE: COMPARISON AREA BASIC DATA (See Figure 22)

| Comparison Area Land Use | | Net Acres Total(Onsite) | | Gross Acres Total(Onsite) | | Employees Total(Onsite) | | Population Total(Onsite) | |
|-------------------------------------|---------------|----------------------------------|-----------|------------------------------|--|----------------------------|--|-----------------------------|--|
| Residential | | Dwelling Units Total(Onsite) | | | | | | | |
| 7 dus/ac ave | 427 (0) | 88 (0) | 103 (0) | | | | | 1,070 (0) | |
| 9 dus/ac ave | 0 (00) | 0 (0) | 0 (0) | | | | | 0 (0) | |
| 11-12 dus/ac ave | 451 (451) | 27 (27) | 30 (30) | | | | | 1,130 (1,130) | |
| 22-23 dus/ac ave | 1,697 (1,697) | 76 (76) | 87 (87) | | | | | 4,240 (4,240) | |
| Subtotals | 2,575 (2,148) | 164 (103) | 220 (117) | | | | | 6,440 (5,370) | |
| Ave. Densities | 10/ac | (21/ac) | | | | | | | |
| Business and Professional Office | | Million Sq. Ft. Total(Onsite) | | | | | | | |
| Commercial | 2.17 (2.17) | 124 (124) | 129 (129) | 9,550 (9,550) | | | | | |
| Schools | .15 (.15) | 19 (19) | 22 (22) | 930 (930) | | | | | |
| Fire Station | 0 (0) | 0 (0) | 0 (0) | 0 (0) | | | | | |
| Subtotals | 0 (0) | 0 (0) | 0 (0) | 0 (0) | | | | | |
| TOTALS | 2.32 (2.32) | 307 (246) | 373 (270) | 10,480 (10,480) | | | | 6,440 (5,370) | |

SOURCE: Wagstaff and Brady

Table 61

ALTERNATIVE 3--I-880 FRONTAGE: COMPARISON AREA BASIC DATA (See Figure A1)

| Comparison Area Land Use | | Net Acres Total(Onsite) | Gross Acres Total(Onsite) | Employees Total(Onsite) | Population Total(Onsite) |
|-------------------------------------|----------------------------------|----------------------------|------------------------------|----------------------------|-----------------------------|
| Residential | Dwelling Units Total(Onsite) | | | | |
| 7 dus/ac ave | 0 (0) | 0 (0) | 0 (0) | | 0 (0) |
| 9 dus/ac ave | 199 (199) | 25 (25) | 30 (30) | | 500 (500) |
| 11-12 dus/ac ave | 1,412 (924) | 112 (74) | 130 (83) | | 3,530 (2,310) |
| 22-23 dus/ac ave | 754 (754) | 39 (39) | 37 (37) | | 1,885 (1,885) |
| Subtotals | 2,365 (1,877) | 176 (138) | 197 (150) | | 5,920 (4,695) |
| Ave. Densities | 13/ac | | | | |
| Business and Professional Office | Million Sq. Ft. Total(Onsite) | | | | |
| Commercial | 2.67 (1.56) | 135 (79) | 159 (93) | 10,400 (6,080) | 0 |
| Schools | .17 .17 | 22 (22) | 26 (26) | 1,080 (1,080) | 0 |
| Fire Station | 0 (0) | 10 (10) | 10 (10) | -- (0) | 0 |
| Subtotals | -- (--) | 1.5 (1.5) | 1.5 (1.5) | -- (--) | -- |
| TOTALS | 2.84 (1.73) | 169 (113) | 197 (131) | 11,480 7,160 | 5,920 (4,695) |

SOURCE: Wagstaff and Brady.

Table 62

ALTERNATIVE 4--N.W. QUAD: COMPARISON AREA BASIC DATA (See Figure A1)

| Comparison Area Land Use | | Net Acres Total(Onsite) | Gross Acres Total(Onsite) | Employees Total(Onsite) | Population Total(Onsite) |
|-------------------------------------|----------------------------------|----------------------------|------------------------------|----------------------------|-----------------------------|
| Residential | Dwelling Units Total(Onsite) | | | | |
| 7 dus/ac ave | 442 (442) | 61 (61) | 94 (94) | | 1,110 (1,110) |
| 9 dus/ac ave | 199 (199) | 22 (22) | 30 (30) | | 500 (500) |
| 11-12 dus/ac ave | 396 (396) | 36 (36) | 43 (43) | | 990 (990) |
| 22-23 dus/ac ave | 1,218 (1,218) | 54 (54) | 59 (59) | | 3,050 (3,050) |
| Subtotals | 2,255 (2,255) | 173 (173) | 226 (226) | | 5,640 (5,640) |
| Ave. Densities | 11/ac | | | | |
| Business and Professional Office | Million Sq. Ft. Total(Onsite) | | | | |
| | 1.73 (.32) | 88 (16) | 103 (19) | 6,780 (1,230) | |
| Commercial | .17 (.17) | 22 (22) | 26 (26) | 1,080 (1,080) | |
| Schools | -- (--) | 10 (10) | 10 (10) | -- (--) | |
| Fire Station | -- (--) | 1.5 (1.5) | 1.5 (1.5) | -- (--) | |
| Subtotals | (.83) | 122 (50) | 141 (57) | | |
| TOTALS | 1.90 (.49) | 295 223 | 367 (283) | 7,860 (2,310) | 5,640 (5,640) |

SOURCE: Wagstaff and Brady

Table 63

ALTERNATIVE 5--NORTH NATOMAS: COMPARISON AREA BASIC DATA (See Figure A1)

| Comparison Area Land Use | | Net Acres Total(Onsite) | Gross Acres Total(Onsite) | Employees Total(Onsite) | Population Total(Onsite) |
|--------------------------------------|----------------------------------|----------------------------|------------------------------|----------------------------|-----------------------------|
| Residential | Dwelling Units Total(Onsite) | | | | |
| 7 dus/ac ave | 1,058 (433) | 149 (61) | 197 (94) | | 2,650 (1,110) |
| 9 dus/ac ave | 199 (199) | 22 (22) | 30 (30) | | 500 (500) |
| 11-12 dus/ac ave | 396 (396) | 36 (36) | 43 (43) | | 990 (990) |
| 22-23 dus/ac ave | 1,218 (1,218) | 54 (54) | 59 (59) | | 3,050 (3,050) |
| Subtotals | 2,870 (2,246) | 261 (173) | 329 (226) | | 7,180 (5,640) |
| Ave. Densities | 11/ac | (13/ac) | | | |
| Business and Professional Office | Million Sq. Ft. Total(Onsite) | | | | |
| Commercial | .32 (.32) | 16 (16) | 19 (19) | 1,232 (1,232) | |
| Schools | .17 (.17) | 22 (22) | 26 (26) | 1,078 (1,078) | |
| Fire Station | -- (--) | 10 (10) | 10 (10) | -- (--) | |
| Subtotals | -- (--) | 1.5 (1.5) | 1.5 (1.5) | -- (--) | |
| TOTALS | .82 (.82) | 311 (223) | 386 (283) | 2,310 (2,310) | 5,700 (5,640) |
| NORTH NATOMAS SITE | | | | | |
| Business and Professional Offices | 3.35 | 181 -- | 212 -- | 13,940 -- | -- -- |
| TOTALS | 4.17 (.82) | 492 (223) | 598 (283) | 16,250 (2,310) | 5,760 (5,640) |

SOURCE: Wagstaff and Brady

Table 64
SOUTH NATOMAS COMMUNITY POPULATION AND HOUSING
CHARACTERISTICS FOR EACH ALTERNATIVE

| | Alternative | | | | |
|--|---------------------|----------|--------------------|--------|--------|
| | No Project | Projects | I-5 | I-880 | NWQ |
| 1980 Population | 12,230 ^a | 12,230 | 12,230 | 12,230 | 12,230 |
| 1980 Dwelling Units | 4,600 ^a | 4,600 | 4,600 | 4,600 | 4,600 |
| 1995 Population | 31,900 ^b | 31,900 | 31,900 | 31,900 | 31,900 |
| 1980-1995 Growth Population | 19,670 | 17,572 | 19,500 | 19,287 | 18,918 |
| Dwelling Units | 7,850 ^d | 7,029 | 7,800 ^g | 7,715 | 7,567 |
| Community Portion of 1980-1995 City Growth (Percent) ^e | 15.1 | 13.5 | 14.9 | 14.8 | 14.5 |
| Community Portion of 1980-1995 County Growth (Percent) ^f | 9.6 | 8.6 | 9.5 | 9.4 | 9.2 |
| 1980 to Buildout, Increment Population | 42,780 | 38,280 | 42,030 | 41,650 | 41,200 |
| Dwelling Units | 17,100 | 15,310 | 16,810 | 16,660 | 16,480 |
| Change in DUs | -- | 1,790 | 290 | 440 | 620 |

SOURCE: Wagstaff & Brady

^aCity staff estimate (see Table 15)

^bSection B-1-e

^c31,900 x 2.5 pop/hh = 12,760 dus

^d12,760 - 4,610 = 7850, 7850 = 45.9% of total buildout (17,100)

^eCity 1980-1995 growth
= 419,700 (W&B) - 289,200 (Table 13)
= 130,500

^fCounty 1980-1995 growth
= 975,600 - 770,200 (Table 11)
= 205,400

Table 65
CHANGES IN TRAFFIC GENERATION DUE TO
PROJECT AND PROJECT ALTERNATIVES

| Land Use Type | SNCP Total ^a | ADT Changes for Each Alternative | | | | |
|------------------|----------------------------|----------------------------------|---------|-----------|-----------|-------------------------------------|
| | | Project | I-5 | I-880 | NWQ | NN |
| Residential | 15,201 | -12,400 | -1,870 | -1,920 | -4,240 | No Change |
| Commercial | 39,000 | 34,725 | -12,600 | No Change | No Change | No Change |
| Office | 3,150 | 47,100 | +29,200 | +37,100 | +27,300 | No Change (+56,180) ^b |
| Totals | 57,351 | +69,432 | +14,730 | +35,180 | +23,060 | No Change (+56,180) |

SOURCE: Wagstaff and Brady

^aTotal ADT for the "Comparison Area" shown in Figure 22

^bAdded ADT at North Natomas site, outside comparison area

Table 66

PROJECT ALTERNATIVES--PEAK HOUR LEVELS OF SERVICE AT CRITICAL INTERSECTIONS

| Intersection | Peak Hour Levels of Service (A.M./P.M.) (LOS/Peak Hour Trips) | | | | | |
|---|---|-------------------|----------------|----------------|--------------------|---------------|
| | SNCP | Proposed Projects | I-5 Frontage | I-880 Frontage | Northwest Quadrant | North Natomas |
| 1. Natomas Oaks Drive/West El Camino | B/C 62/77 | F/F 119/142 | F/F 105/131 | F/F 133/151 | F/F 103/116 | B/E 64/94 |
| 2. I-5 Northbound Off-ramp/ West El Camino | A/B 43/59 | F/C 115/73 | D/B 79/64 | E/B 96/65 | C/B 71/59 | A/B 40/56 |
| 3. New Collector/Garden Highway | A/A 43/51 | A/F 49/104 | E/F 95/147 | E/F 91/118 | D/F 88/106 | D/F 88/105 |
| 4. Orchard/West El Camino | A/A 46/52 | B/C 58/67 | A/B 54/61 | F/D 103/87 | F/E 145/96 | A/A 49/55 |
| 5. I-5 Northbound Off-ramp/ Garden Highway | A/B 41/56 | B/C 65/73 | A/B 46/59 | A/A 45/49 | A/A 43/48 | A/A 52/47 |
| 6. I-5 Southbound Off-ramp/ Garden Highway | B/D 65/80 | F/F 126/122 | F/F 114/126 | F/F 104/120 | E/F 96/113 | D/F 82/111 |

SOURCE: CH2M HILL

Table 67

INCREMENTAL ANNUAL PUBLIC REVENUES COMPARED TO NO PROJECT ALTERNATIVES (\$000)

| Plan Alternative | Total Property Tax | Municipal Property Tax ^a | Sales Tax ^b | State Subventions ^c | Federal Subventions ^d | Other Taxes and Licenses ^e | Sacramento City Totals |
|------------------|--------------------------|---|---------------------------|-----------------------------------|-------------------------------------|---|------------------------------|
| Natomas Eastside | 1,100 | 132 | 64 | -41 | -20 | -- | 135 |
| Gateway Centre | 690 | 83 | 71 | -63 | -31 | -- | 60 |
| Total Projects | 1,790 | 215 | 135 | -104 | -51 | -- | 195 |
| I-5 | 1,290 | 155 | -21 | -34 | -17 | -- | 85 |
| I-880 Frontage | 1,890 | 227 | -- | -17 | -9 | -- | 200 |
| NW Quadrant | 1,110 | 133 | -- | -39 | -20 | -- | 75 |
| North Natomas | 3,020 | 362 | -- | -- | -- | 360 | -- |

SOURCE: LeBlanc & Company

Table 68 SUMMARY OF INCREMENTAL MUNICIPAL COSTS AND REVENUES FROM PROJECT ALTERNATIVES
COMPARED TO NO PROJECT (\$000)

| | Capital | | | Operating | | |
|------------------|--------------------|----------|------|--------------------|----------|-----|
| | Costs ^a | Revenues | Net | Costs ^b | Revenues | Net |
| Natomas Eastside | -225 | 990 | 1217 | -40 | 135 | 175 |
| Gateway Centre | -350 | 760 | 1111 | -60 | 60 | 120 |
| Total Projects | -580 | 1750 | 2328 | -100 | 195 | 295 |
| I-5 | -95 | 1900 | 2000 | -18 | 85 | 120 |
| I-880 | -15 | 2090 | 2260 | -28 | 200 | 215 |
| Northwest Quad | -220 | 1090 | 1310 | -35 | 75 | 110 |
| North Natomas | 825 | 3015 | 2190 | 450 | 360 | 90 |

Table 69
PREDICTED ROADSIDE CARBON MONOXIDE LEVELS, YEAR 1990 ALTERNATIVE ANALYSIS

| Receptor | Location ^c | Peak 1-Hour Concentration (ppm) at Edge of Roadway ^{a,b} | | | | |
|----------|-----------------------------|--|--------|--------|--------|--------|
| | | Project | Alt. 1 | Alt. 2 | Alt. 3 | Alt. 4 |
| 1 | I-5 at Garden Hwy | 5.8 | 5.7 | 5.6 | 5.5 | 5.8 |
| 2 | I-5 at El Camino | 10.5 | 9.7 | 10.5 | 9.3 | 8.4 |
| 3 | I-5 at I-880 | 4.3 | 4.2 | 4.2 | 4.2 | 4.7 |
| 4 | I-880 at El Camino | 3.5 | 3.5 | 3.6 | 3.6 | 3.4 |
| 5 | I-880 at Northgate | 7.3 | 7.1 | 7.1 | 7.1 | 7.4 |
| 6 | I-880 at Garden Hwy | 2.5 | 2.5 | 2.6 | 2.6 | 2.6 |
| 7 | El Camino at New Collector | 6.7 | 6.0 | 7.0 | 6.9 | 5.3 |
| 8 | El Camino at Truxel | 16.7 | 16.0 | 16.4 | 15.3 | 14.6 |
| 9 | El Camino at Northgate | 11.5 | 11.4 | 11.5 | 11.5 | 11.3 |
| 10 | Garden Hwy at New Collector | 5.1 | 4.9 | 5.1 | 5.5 | 5.0 |
| 11 | Garden Hwy at Truxel | 2.5 | 2.4 | 2.5 | 2.5 | 2.5 |
| 12 | Garden Hwy at Northgate | 14.9 | 14.9 | 14.9 | 14.9 | 14.9 |
| 13 | Truxel at San Juan | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 |
| 14 | Northgate at San Juan | 5.7 | 5.6 | 5.6 | 5.6 | 5.7 |

^a A 2 part per million (ppm) CO background level was added to all predicted concentrations.

^b Federal 1-hour standard for CO is 35 ppm.

^c See Figure 18 for receptor locations.

Table 70
PREDICTED ROADSIDE CARBON MONOXIDE LEVELS, YEAR 2000 ALTERNATIVE ANALYSIS

| Receptor | Location ^c | Peak 1-Hour Concentration (ppm) at Edge of Roadway ^{a,b} | | | | |
|----------|-----------------------------|--|--------|--------|--------|--------|
| | | Project | Alt. 1 | Alt. 2 | Alt. 3 | Alt. 4 |
| 1 | I-5 at Garden Hwy | 5.4 | 5.2 | 5.2 | 5.1 | 5.3 |
| 2 | I-5 at El Camino | 9.5 | 8.8 | 9.5 | 8.4 | 7.8 |
| 3 | I-5 at I-880 | 4.1 | 4.0 | 4.0 | 4.0 | 4.4 |
| 4 | I-880 at El Camino | 3.4 | 3.3 | 3.4 | 3.4 | 3.2 |
| 5 | I-880 at Northgate | 6.7 | 6.6 | 6.6 | 6.6 | 6.9 |
| 6 | I-880 at Garden Hwy | 2.5 | 2.5 | 2.5 | 2.5 | 2.5 |
| 7 | El Camino at New Collector | 6.2 | 5.6 | 6.4 | 6.3 | 5.0 |
| 8 | El Camino at Truxel | 15.0 | 14.5 | 14.7 | 13.8 | 13.1 |
| 9 | El Camino at Northgate | 10.4 | 10.3 | 10.4 | 10.4 | 10.2 |
| 10 | Garden Hwy at New Collector | 4.8 | 4.5 | 4.7 | 5.0 | 4.6 |
| 11 | Garden Hwy at Truxel | 2.4 | 2.4 | 2.4 | 2.4 | 2.5 |
| 12 | Garden Hwy at Northgate | 13.5 | 13.5 | 13.4 | 13.4 | 13.4 |
| 13 | Truxel at San Juan | 2.4 | 2.3 | 2.3 | 2.3 | 2.4 |
| 14 | Northgate at San Juan | 5.2 | 5.2 | 5.2 | 5.2 | 5.3 |

^a A 2 part per million (ppm) CO background level was added to all predicted concentrations.

^b Federal 1-hour standard for CO is 35 ppm.

^c See Figure 18 for receptor locations.

Table 71
VEHICLE MILES TRAVELLED (PROJECT VS. ALTERNATIVES)

| Trip Distribution by Direction | Average Miles Travelled | Total Vehicle Miles Travelled (in 1,000's) | | | | |
|--------------------------------------|-------------------------------|--|---------|---------|---------|---------|
| | | Project | Alt. 1 | Alt. 2 | Alt. 3 | Alt. 4 |
| West | 15 | 139.5 | 123.0 | 127.5 | 117.0 | 139.5 |
| S/SE | 9.17 | 1,022.1 | 902.3 | 927.1 | 856.5 | 124.3 |
| East | 6.0 | 69.7 | 61.5 | 63.1 | 58.7 | 69.9 |
| NE | 10.91 | 380.5 | 335.5 | 344.5 | 319.9 | 381.3 |
| North | 4.0 | 0 | 0 | 0 | 0 | 134.5 |
| Internal | 2.0 | 18.5 | 13.9 | 15.0 | 12.9 | 18.0 |
| | | 1,630.3 | 1,436.2 | 1,477.2 | 1,365.0 | 1,767.5 |

- A.M. peak = 10% of ADT
- All traffic going south uses either I-5 or Northgate
- All traffic going west uses I-880
- All traffic going east (25%)/northeast (75%) uses I-880 and El Camino

Table 72
COMPARISON OF PROJECT AND ALTERNATIVE GENERATED
EMISSIONS--1990

| Pollutant | Emissions (tons/day) | | | | |
|------------------------------------|----------------------|--------|--------|--------|--------|
| | Project | Alt. 1 | Alt. 2 | Alt. 3 | Alt. 4 |
| Carbon Monoxide (CO) | 24.5 | 21.6 | 22.2 | 20.2 | 26.2 |
| Nitrogen Oxides (NO _x) | 3.7 | 3.2 | 3.3 | 3.0 | 4.0 |
| Total Hydrocarbons (THC) | 2.1 | 1.9 | 1.9 | 1.7 | 2.3 |
| Sulfur Dioxide (SO ₂) | 0.4 | 0.4 | 0.4 | 0.4 | 0.5 |
| Particulates (TSP) | 0.6 | 0.5 | 0.5 | 0.5 | 0.6 |

Table 73
ESTIMATED ANNUAL OPERATIONS-RELATED ENERGY CONSUMPTION CHARACTERISTICS OF PROJECT ALTERNATIVES

| | Alternatives | | | |
|---------------------------------------|---------------------|-----------------------|---------------------------|----------------------|
| | <u>I-5 Frontage</u> | <u>I-880 Frontage</u> | <u>Northwest Quadrant</u> | <u>North Natomas</u> |
| <u>Quantity Factor</u> | | | | |
| Residential (a) | 1,023 units | 873 units | -- | -- |
| Offices | 1,959,200 sq. ft. | 2,022,400 sq. ft. | 1,390,400 sq. ft. | 2,859,800 sq. ft. |
| Commercial | 300,200 sq. ft. | 347,600 sq. ft. | -- | -- |
| <u>Annual Unit Energy Consumption</u> | | | | |
| Residential (b) | 1,400 therms/unit | same as I-5 | same as I-5 | same as I-5 |
| Offices (c) | 1.38 therms/sq. ft. | Frontage | Frontage | Frontage |
| Commercial (c) | 1.38 therms/sq. ft. | Alternative | Alternative | Alternative |
| <u>Annual Energy Consumption</u> | | | | |
| Residential | 1.4 million therms | 1.2 million therms | -- | -- |
| Offices | 2.7 million therms | 2.8 million therms | 1.9 million therms | 3.9 million therms |
| Commercial | 0.4 million therms | 0.5 million therms | -- | -- |
| Total Annual Energy Consumption | 4.5 million therms | 4.5 million therms | 1.9 million therms | 3.9 million therms |

SOURCE: Wagstaff and Brady

- (a) Number of residential units estimated for construction on alternative project site.
 (b) Note: All housing units are assumed to have the same energy consumption characteristics as State Energy Commission estimates for a typical townhouse. Source: Goldstein & Rosenfeld.
 (c) Source: California State Energy Commission, Goldstein & Rosenfeld.

Table 74

ESTIMATED TRANSPORTATION ENERGY CONSUMPTION FOR THE PROJECT ALTERNATIVES

| | <u>I-5 Frontage Alternative</u> | <u>I-880 Frontage Alternative</u> | <u>Northwest Quadrant Alternative</u> | <u>North Natomas Alternative</u> |
|---|-------------------------------------|---------------------------------------|---|--------------------------------------|
| Trips per Day | | | | |
| Workday (a) | 55,310 | 53,710 | 24,390 | 50,170 |
| Weekend/Holiday (b) | 23,002 | 20,360 | Ø | Ø |
| Average Trip Distance (c) | 9.7 | 9.7 | 9.3 | 7.8 |
| Vehicle Miles per Day | | | | |
| Workday | 536,507 | 520,987 | 226,827 | 391,326 |
| Weekend/Holiday | 223,119 | 197,492 | (f) | (f) |
| Average Energy Consumption per Vehicle (d) | 16.4 mpg | 16.4 mpg | 16.4 mpg | 16.4 mpg |
| Daily Energy Consumption (gal.) | | | | |
| Workday | 32,710 | 31,770 | 13,830 | 23,860 |
| Weekend/Holiday | 13,600 | 12,040 | (f) | (f) |
| Annual Energy Consumption (million gallons) (e) | | | | |
| Workdays | 7.3 | 7.1 | 3.1 | 5.3 |
| Weekends/Holidays | <u>1.9</u> | <u>1.7</u> | <u>(f)</u> | <u>(f)</u> |
| Total Annual Fuel Consumption (million gallons) | 9.2 | 8.8 | 3.1 | 5.3 |
| Energy Value of Total Annual Fuel Consumption (million therms) | 12.4 | 11.9 | 4.2 | 7.2 |

SOURCE: Wagstaff and Brady

(a) Note: Includes total trips per day for all uses. Source: CH2M Hill.

(b) Note: Includes total trips per day for all uses minus office uses, which are workday activities only. Source: CH2M Hill.

(c) Source: Wagstaff and Brady calculations based on data from CH2M Hill.

(d) Source: George S. Nolte and Assoc., Final EIR, Menlo Industrial Center, Menlo Park, California, April 1979.

(e) Note: Total number of annual workdays assumed to be 223; weekends/holidays 142.

(f) Note: Commuting for maintenance, security, and overtime work is assumed to be insignificant for this analysis.



R. ORGANIZATIONS AND PERSONS CONTACTED

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Clifford Carstens, Senior Planner
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Dee Lewis, City Engineering Department
Jim Bloodgood, Traffic Engineering Division
Rich Overton, Police Department
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Erling Linggi, City Community Services

COUNTY OF SACRAMENTO

Thomas Hutchings, Planning Department
Douglas Frederick, Public Works Division
Robert Berger, Environmental Health Services
Robert Coffey, Air Pollution Control District
George McLaughlin, Airport Department

SCHOOLS

Dr. Edward Walsh, Grant Joint Union High School District
Dr. Myron Cross, Natomas Union School District

OTHER LOCAL AGENCIES

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John S. Goodson, Natomas Central Mutual Water Company
Russ Kilner, Natomas Airpark

REGIONAL AGENCIES

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Hinda Chandler, Regional Transit Authority
Leo Fossler, Distribution Planning, Sacramento Municipal Utility District

STATE OF CALIFORNIA

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James A. Robertson, Central Valley Regional Water Quality Control Board
Andy Ranzeri, Air Resources Board
Chris Peck, Solid Waste Management Board
Eldon Rinehart, Reclamation Board, Department of Water Resources

FEDERAL GOVERNMENT

James McBride, U.S. Army Corps of Engineers
James McHan, U.S. Bureau of Reclamation

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Ted Amico, Spinks Corporation

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Tina Thomas, Environmental Council of Sacramento
Robert Doyle, South Natomas Advisory Committee
Donald Harrell, South Natomas Community Association
Chuck Mastin, South Natomas Community Association
Ray Tretheway, South Natomas Community Association

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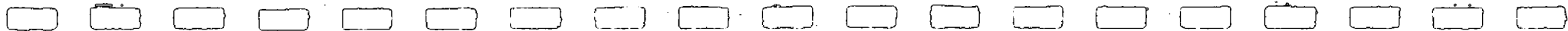
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January 5, 1981

SOUTH NATOMAS BUSINESS PARK PROPOSALS HEARING AGENDA

ORDER OF PRESENTATION

TIME ESTIMATES

EIR

| | |
|-------------------------------|-----------|
| City Staff Summary | 5 minutes |
| Applicants - Natomas Eastside | 5 minutes |
| Gateway Centre | 5 minutes |
| Public | |
| City Council - Questions. | |
| Close hearing on EIR | |

Projects

| | |
|-------------------------------------|------------|
| City Staff Presentation | 10 minutes |
| Proponents | |
| Natomas Eastside | 30 minutes |
| Gateway Centre | 45 minutes |
| Others | |
| Opponents | |
| South Natomas Community Association | 30 minutes |
| Others | |
| Rebuttal | |
| Proponents | |
| Natomas Eastside | |
| Gateway Centre | |
| Others | |
| Opponents | |
| SNCA | |
| Others | |

Closing comments and recommendation by staff

COUNCIL REVIEW *

Close public hearing on projects.

Questions and discussion

Action

EIR Determination

Projects - Natomas Eastside

Gateway Centre

*NOTE: The Council during this period may ask questions of any party: Staff, Applicants, Witnesses.

Save Our Community Plan! Come to City Hall Jan. 5, 7:30

SOUTH NATOMAS

COMMUNITY ASSOCIATION

NEWS

Vol. 2, No. 1

P. O. Box 15362, Sacramento, CA 95813

January, 1982

EDITORIAL

Looking Ahead

It is seldom, if ever, in one's life time, that an opportunity presents itself to be in on the initial planning of a community, large or small.

Communes have blossomed and quickly died. "New Towns" have grown on paper, but have usually failed to live up to their original promises.

Here in South Natomas we have the rare privilege to be in on the very beginning of a planned community that could well become a pattern for the state and nation.

We are a section of a large city, but apart because of our unique geography.

We are dependent on the "outside" for a large portion of our livelihood, but we are independent because our new roots are anchored here, and we have a life-style suitable to our own purposes.

We are not "clannish," but we know we have friends and neighbors to whom we can turn in emergencies.

We are a diverse group: WE are black and white; Spanish and Oriental; Irish, German, Slav, Nordic; we are the true cross-section of the world, and most certainly, because of many of our eastern origins, of the United States.

We have our problems, personal and collective. We also have our personal and collective dreams.

Looking ahead, as we begin another New Year, here are a few of our dreams for the South Natomas community.

We see a community of families, whose children can attend a school close by, a part of a newly reorganized Natomas School District that will have consolidated North Sacramento, Del Paso, and Washington School Districts into one.

We see a transit system that does not include diesel buses, that will have

(turn to page 8)

Planning Commission Votes Against Office Parks

After five hours of argument by hardy and disciplined debaters and five hours of listening and questioning by durable City Planning Commissioners, the Commission voted six to one, with two abstaining, against two business parks proposed for South Natomas. The Commissioners voted specifically against changing the City General Plan and the South Natomas Community Plan; they voted against change in zoning; they voted to affirm the Environmental Impact Report and to accept the recommendation of the City Planning staff.

Commissioners weighed plans that claimed future economic benefit against arguments that claimed future environmental degradation and decided to preserve the environment. They said

Councilman Shore at SNCA Meeting

David Shore, recently elected City Councilman, will speak to South Natomas residents at the regular monthly meeting of the SNCA, Thursday night, January 7, 7:30 at the Stanford Settlement.

"I want to listen to the people, get some of their ideas and requests, and outline some of the things we want to accomplish within the near future," Shore said.

Shore has assured members of the SNCA that he will be active in representing the Community at City Council, as well as becoming involved

(turn to page 2)

they were not against diversifying Sacramento's economy, but they were against the location proposed for the business parks.

Such was the decision December 17. According to information at presstime, the City Council has the question of the two South Natomas business parks --- Gateway Centre and Natomas Eastside --- on its January 5 agenda.

To the more than seventy-five South Natomas residents who attended the Planning Commission meeting, some standing along the walls, a report of the proceedings will not be news. To residents who plan to attend the City Council hearings beginning January 5, a report may be required reading.

Everybody, it appeared, wants something from the environment, some kind of life that the environment will support, but in the case of South Natomas, there is not much environment to go around. Careful decisions about it have already been made and incorporated in the City General Plan and the South Natomas Community Plan. Roger Dickinson, speaking for the Environmental Council of Sacramento, said that these pains represent fundamental commitments by the City. "They are articles of faith between city and community."

The South Natomas Community Plan does not stand alone but is integrated with the City General Plan. According to the EIR the two together emphasize high residential density in

(turn to page 8)

From the Corner Office

From its inception, the South Natomas Community Association has suggested to the residents that commercial, office parks and industrial developments have no place in the growth of South Natomas. The South Natomas Community Plan, hammered out during months of studies, outlines healthy growth patterns in our small "island." Almost every issue of the SNCA News has had at least one story dealing with the threat of office parks to the local environment.

At the City Planning Commission Meeting on December 17, the Commission voted 6 to 1 to reject the proposed "office parks" of the Lee Sammis company and Enlow Ose, developers. This vote followed the recommendation of the City Planning Department, which denied both projects emphatically.

At the meeting the SNCA was well represented by a great turn-out of some 75 people from the community, as well as friends from the Garden Highway Homeowners Association, ECOS, Save the American River Association (SARA), and the League of Women Voters.

The Planning Commission vote was a major victory for the SNCA.

But a larger challenge is still ahead if the South Natomas Community Plan is to be preserved.

During the month of January, these same developers, rejected by the community, the City Planning Department and the Planning Commission, will present their case before the City Council, which is the final arbiter in these matters.

Our discussions with several City Council members since the Planning Commission vote indicate that the developers are already working on a scaled-down compromise from the original proposals.

Often in cases like these it is difficult to combat compromise moves. City Councils, in Sacramento and in other places, sometimes feel that it is easier to

give a little than to turn down proposals completely. It seems that is the way politics works.

However, our newly elected Councilman, David Shore, stands committed against the proposed office parks. Several other Council members also are on the side of the South Natomas Community in our efforts to hold to the Plan.

But we in the community have much to do if we are to turn back these office and industrial park zoning proposals.

We will have to attend, in a body, every City Council meeting where the proposals are discussed.

We will have to get our friends and neighbors to join us in the audience.

We will have to contact each and every Council member to let them know how we feel about saving our community from the tremendous influx of traffic that these so-called parks would attract.

We will have to tell the Council how we feel about housing displacement within our community.

We must write letters to the editors of the BEE and the UNION.

In other words, we must become very vocal in letting our feelings and needs be known.

Only then will we have a real chance to defeat these projects and others like them that are sure to follow, and get to the serious business of making the South Natomas community the best in the state, if not the country.

Don Horel,
President
SNCA

Head Start Enrollments Open

Children between the ages of three and five who are from low-income families may be enrolled in a Head Start preschool program which will commence in South Natomas at Garden Valley Center on January 4.

Mary Gallegos, Social Service assistant with the Sacramento Area Economic Opportunity Council, says that the philosophy of Head Start is to care for the whole child -- health, education, social needs, complete well-being.

The program operates 3½ hours each morning. Lunch and snack are served.

Parents who wish to enroll children may call Mrs. Gallegos at 381-8116. She says that there are openings in the program and that an afternoon class may be started when the morning class is filled.

SNCA Meeting

(cont. from page 1)

with problems that the Community has experienced in the past.

All residents are encouraged to come to the meeting, and get to know the new councilman

'There are many programs that we want to institute during 1982,' said SNCA president Don Horel. 'We are looking for a good turnout at the Thursday night meeting, as well as at the City Council on Tuesday night, January 5.'

The South Natomas News is published by members of the Community Association. Four thousand five hundred copies are delivered to residents and merchants of the South Natomas area every month.

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MARILYN MANTAY

Writing and Research

739-0751

Small Farms Plan for Spring

Most local residents and refugee farmers had such satisfaction and return from the Small Farms Project that they will be farming a second year. But there will be a few plots available for other interested farmers who can produce for market. This is the report of Ted Torngren, County Cooperative Agricultural Extension director, following the harvest of summer vegetables and the planting of winter crops at the site in Northgate Park.

In fact, the success of this project may lead Torngren to recommend that two other projects be started in Sacramento.

People in South Natomas realize that the project might have failed were it not for the care and concern of local residents. Twelve residents served on an advisory committee that met frequently with the farmers, or with On-Site Coordinator Frank Hurd, the Master Gardener who devoted many, many hours to the project. It was Frank who brought problems to the advisory committee so that they could be tackled promptly.

Initial problems refugee farmers had with understanding American farming and marketing techniques were eventually solved with the aid of Master Gardener Ben Lam. This man brought both technical skill and language expertise when he offered his services as interpreter. Now the refugee farmers have chosen the two among them who speak the best English to alternate as their representatives to the advisory committee.

Meanwhile the funds granted by the City Council have been used. At a recent meeting with the advisory committee, the farmers agreed to pay \$40 per half acre twice a year to bear the cost of the project, the first payment being due before February 1.

Six of seven refugee families will continue to farm, as will nine of the eleven local residents. Information about the available plots may be had from Sharon Wright, at 927-1303.

Assemblywoman Moorhead Offers Comments

Important information on 1982-83 student financial aid programs is available for local college students at Assemblywoman Jean Moorhead's office.

Moorhead's office will send interested students copies of the new student aid application, the California student financial aid workbook and Cal grant applications.

The workbook is designed to familiarize students with all the financial aid programs - Federal, State and campus-based. It also describes how students may apply for aid.

The postmark deadline for all applications is February 10, 1982, so students should contact Moorhead's office immediately for application materials.

Senate Bill 4, the container deposit law that would place a deposit

on beer bottles and aluminum cans, will be reconsidered in the Legislature some time in January.

Container deposit laws are in effect in six states, and studies indicate significant savings of aluminum, steel, glass and energy because 90 percent of the containers are returned.

Proposals in California have received the support of many organizations but have been opposed by manufacturers and distributors. A group called Californians Against Waste has begun to circulate petitions to place the proposal on the June or November ballot.

Should Senate Bill 4 come to the Assembly floor, Moorhead will have the opportunity to vote and would like her constituents' views on this matter.

Moorhead's office is at 6021-A Madison Avenue, Carmichael 95608. Telephone 334-8228.



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Rio Tierra Happenings

by
Isabel Sanders

Suggestion Box:

Alice Davey, vice-chairperson of the School Advisory Committee, reports that almost 300 suggestions from students, parents and faculty have found their way into the Suggestion Box since it was placed in the cafeteria

last month. Two particular interests --- to have a cheerleading team and to have a school newspaper --- may be implemented with the accord of Mrs. Merino and the student body council. The School Advisory Committee, which initiated the idea of the Box, is delighted not only by the number of suggestions but by their merit.

SAC Meeting:

"To help make constructive use of the differences between us," is the object of an unusual self-testing program that will commence at the School Advisory Committee meeting January 12 at 7:00 PM in the school library. Each person will take a quiz which has been developed and standardized to show similarities and differences among people. At the February meeting, Elizabeth Coleman, In-Service Specialist for the Grant Union High School District, will evaluate and discuss results. Parents and members of the community are welcome at SAC meetings.

Welcome:

Mrs. Maria Robles is Rio Tierra's new Spanish teacher. Four new teacher's aides are Ann Perkins, Reyna Borden, Lori LoBu and Marla Reynolds.

Transfer:

Mr. Xavier Rivera is leaving Rio Tierra to go to Norte Del Rio, where he will be vice-principal.

Wrestlers:

Winning wrestlers at the special competition December 15 were: Ron Lopez, Darryl Taylor, Anthony Pacheco, Toby Vann, Wesley Kelley, Todd Huffstutler, Tino Delgadillo, Zachery Ragan, Jose Jiminez, Moe Fernandez, Leo DeArcos and Joe Romero.

Bowl-A-Thon for Bobby:

Fourteen students and faculty members participated December 14 in a bowl-a-thon to help with medical expenses for Rio Tierra student Bobby Manor. Through pledges of ½ cent or 1 cent per pin, the bowlers raised \$500 for the Manor family.

Bowlers were: Tracy Lane, Anthony Mitchum, Pat Coker, Chris Dubay, Kimberly Glidewell, Joan Standley, Lydia Romero, Francilla Cordova, Sherelle McNeely, Wade Stanley, Miss Stultz, Mrs. Owen, Mrs. Coursey and Mr. Moser. Top series: Lydia Romero. Top game: Pat Coker.

Rio Tierra is particularly anxious to bring together students and staff its first fifteen years. We will have a reunion in the spring.

If you attended Rio Tierra between 1956 and 1972, please fill out this form and return it to Rio Tierra Junior High School, 3201 Northstead Drive, Sacramento, CA 95833. Enclose a snapshot if you have one.

Present name _____

Address _____

Telephone _____

Attended _____

Northgate Center Recreation

An overnight trip to Reno, one way by Amtrak and the other by bus, is planned for February 11 and 12 by participants in the adult recreation program at the Northgate Community Center.

Lorraine Peterson, Center Director, says that hotel and transportation will cost each person \$50 and that there will be a bonus of \$18 cash and \$6 food. The group will stay overnight at the Sahara Hotel and will spend three hours at the MGM and three hours at the El Dorado before returning to Sacramento. The group will leave by Amtrak at 3:05 PM February 11 and will arrive back in Sacramento at 6 PM February 12.

Only 43 people may go. Reservations, paid in full, must be made by January 8. Further information is available from the Northgate Center, 2702 Northgate Blvd., telephone 922-8731, weekdays between 9 and 3.



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Planning Commission

(Cont. from page 1)

South Natomas and continued revitalization of the Central Business District. Yet it is apparently the view of developers that the business parks could be built without drastic revision of these plans.

Developers claim that damage to the quality of life, particularly that damage caused by increased traffic, could be "mitigated," if, in fact, it occurred at all before the "build-out" of South Natomas, a situation they do not anticipate for some decades. Yet they said, if both business parks were built, 50 percent of South Natomas traffic would come from them.

Mitigation of traffic problems at all intersections but one could be accomplished, developers said, by addition of traffic lanes for turning. Ray Tretheway, speaking for SNCA, wondered who would bear the burden of the traffic as well as the cost of this mitigation. SNCA President Don Horel argued against "planned massive congestion." Heather Fargo, also speaking for SNCA, referred to the congested traffic situations called by traffic engineers D, E and F, and said she did not ever want to deal with any of them. (The West El Camino-Interstate 5 situation, not being amenable to "mitigation", could, with business parks and at peak hours, be an "F", which is a condition of extreme congestion.)

Developers of the proposed Gateway Centre and Natomas Eastside had the benefit of attorneys and experts who spoke at length. They did address themselves to possible traffic problems. They did not address themselves at all to impact on air and water and the natural environment. They said the cost of housing would rise as space was reduced and demand increased, but they minimized the contribution of land cost to total dwelling cost, at least in the view of Commissioner George Muraki.

Developers claimed that business parks would create jobs. Economics professor Robert Fountain generated employment statistics based on similar businesses in similar business parks elsewhere. He said that 70% of the jobs could be in entry clerical classifications and 30% in management. He did not claim people presently unemployed would be qualified for these jobs, but he said that many Sacramentans are employed below their level of competence, and they could move up, leaving their present positions to others. He did not say how one moves up to an entry level position.

It was not with mitigating environmental impact or broadening the local economic base that the developers' spokespersons were most concerned. Their eyes were on the specific business environment each is trying to create. Firms who are interested, they said, want a high quality area with room to expand, and with quality neighbors. They want a garden-type environment and will not locate downtown, but they want to have a relationship with downtown. Developer Lee Sammis apparently sees South Natomas as an extension of the downtown business district.

A speaker for Sunset Construction, a potential builder with a user in mind, said, not mincing words, "Our user wants a controlled business environment."

Leaving the meeting, a Natomas resident said, "When it comes to environmental control, we'd settle for about two-thirds of that."

ARC Auditions

Acting and singing auditions for the musical mystery *Something's Afoot*, a satire on Agatha Christie mysteries and musical styles of the past, will be held in the American River College Theater on January 10 and 11 from 7 to 10 PM.

There are parts for six men and four women of various ages. Those auditioning should bring their own sheet music, but scripts will be provided.

Carl K. White is director and Larry Anderson is musical director.

Production dates are March 11, 12, 13, 18, 19, 20.

For more information call 484-8234.

PET HEALTH



By Al Aldrete D.V.M.

Kittens, puppies, chicks and rabbits which are given during the holidays are given as an expression of love. When the tiny pet is given to a child a special bond of love grows between the two. But as the novelty wears off and the pet begins to grow, it becomes the responsibility of both the parent and the child to see that the young pet receives proper care. This experience can be very rewarding for all involved.

Careful attention should be given as to what type and size of animal was chosen to help it fit into the family life style and living accommodations.

Puppies and kittens need post-natal care, just like their human counter-parts. They should be taken at a very early age to their veterinarian for a physical exam and their first vaccinations. For puppies, depending upon their age, they should receive the following vaccinations: distemper, hepatitis, leptospirosis, parainfluenza (DHL-P), and parvo. These usually require a series of three vaccinations followed by annual boosters. The rabies vaccination is usually given at four months of age with boosters every two years. Fecal examinations can be done during any of these visits to look for internal parasites, and treatment given for the specific type that may be found.

Kittens also need to be examined for parasites and treated if they are found. Vaccinations are given for panleukopenia (feline distemper), feline viral rhinotracheitis, and calici (upper respiratory infection). These are usually given in two series of two vaccinations with yearly boosters.

Often neutering will make the animal a better pet. If breeding the pet is not being considered, then the surgery for the neutering can be done any time after six months of age.

So by giving a pet for the holidays and by practicing preventive health care, the little pet should grow and give many years of love and fun.

Happy New Year!

If you have questions regarding pet health care, you can write Dr. Aldrete in care of the South Natomas Community Association News.

Stanford Settlement

Income Tax Service:

Free income tax assistance for low-income people will be offered at Stanford Settlement beginning Saturday, January 30 and continuing each Saturday through March 27. Hours will be 10 AM to 2 PM. Professional volunteers come from the Society of California Accountants and from the American Society of Women Accountants. Coordinator for the service is Alan Felion.

For information and appointments call 927-1303 and ask for Sharon.

Community Gardens:

Spots are available this year in two Community Gardens, one located on San Juan just off Northgate Blvd., and the other on Mendel and Brewerton behind Northgate Park. Sharon Wright, at 927-1303, is taking sign-ups.

A registration fee of \$2 per year is required to help pay for hoses and tools. Each gardener also is required to attend a monthly meeting to talk over problems and concerns.

Sharon urges anyone interested in gardening and in having a spot in a Community Garden to call her.

Senior Activities:

The Senior Center will be open Saturday, January 9, for a potluck. Transportation will be provided.

On Tuesday, January 26, Seniors will journey to the Hershey Chocolate Factory in Oakdale and will stop for lunch at Pollardville, outside of Stockton.

SMYTHE SCHOOL NEWS

by
Margaret Kirchgater

Smythe School teams will participate in the City of Sacramento basketball league when the season begins Monday, January 11. Girls' team members are: Deanna Dillard, Diana Romero, Tasha Pruitt, Monica Basurto, Yvonne Soo Hoo, Rosa Hernandez, Josephine Reyes, Gina Kincannon, Marsha Rhodes, Lana Tallmadge, Kelly Holt, Melissa Blair, Rose Ann Nebreda, Esther Hunt and Marilou Carino. Mr. Rudy Romero will be their coach.

Members of the boys' team are: Dan Chavez, Dominick Vann, Gabriel Contreras, Robert Alvarez, Larry Moreno, Darren Francis, Rico Romano, Joe Moreno, Jimmy Parker, Jimmy Ledesma, Ricky Garcia, John Best, Monte Williams and Robert Schillings. Their coach is Mr. Al Contreras.

The name of Micah Johnson, alternate from Mrs. Koons' room to the Student Council, was missed when we listed Student Council members. Sorry, Micah.

The Student Council is collecting Campbell Soup labels to earn additional P. E. equipment for the school. The drive continues through February 20.

The School Advisory Committee will meet Thursday, January 14, at 7:00 PM. All community members are invited to attend.

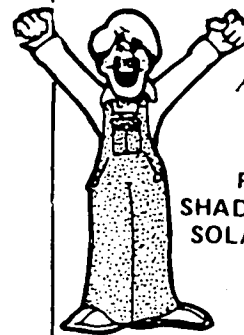
Hangar Hoe-Down

The Hangar Hoe-Down, to benefit Stanford Settlement one hundred percent, is gonna be at a hangar, that is, at our own Natomas Air Park, on Saturday March 6. We expect the best country western music and dancing ever to be found in these parts, but that's not the half of it.

SNCA president Don Horel is running the greatest chili cook-off west of the Mississippi. Like as not a few secret recipes are being invented just for this occasion. Raffles and prizes, food and drink: we'll have it all.

SNCA is joining up with Stanford Settlement in making plans and doing the work for this big event. Tickets will cost \$6, but they're not printed yet. What's needed right now are people to fill out the committees. For ground-floor volunteering, call Sharon at 927-1303.

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OPENING JAN. 11 Peace Lutheran Pre-School

We are finally opening our Christian Pre-School. Registrations are encouraged by January 4. On January 4 at 7:30 P.M. a registration night will be held, or you may phone for an application.

927-5934

925 San Juan Road

Letters

Editor, SNCA News

Dear Editor,

I would like to thank all those people who voted for me in the recent election in the Natomas Union School District. I am looking forward to working with all the people who live in the Natomas area.

Our school district will face tremendous challenges in the years ahead in terms of growth, district communication, and preserving a quality educational program for our children. This will require a united community effort.

Sincerely,
Alan L. Clarke

Editor, SNCA News

Dear Editor,

Two years ago our oldest son started first grade at Dos Rios school on Richards Blvd. Part way through the year his teacher told me he had some problem areas in his work but she did not have the time to work with him.

Feeling that this was a wrong attitude, I went in search of another school. Smythe School, which is about ½ mile from our house, was my first stop, but I was turned away. Our street was once in the boundaries but no longer is. The new boundary is only two streets over from ours.

After much searching I found a school about six miles away that would gladly accept our son. I learned after enrolling him that several other families faced with the same problem are driving their children six miles every day also, when there sits Smythe just down the street from all of us.

Smythe is a public school, so why can't our children attend it? Instead, they are supposed to be bused to a school where, through my experience, they can't get a good education because the teachers don't have time. We have to take our children out of their neighborhood to the one school that welcomes them.

Why can't our children attend Smythe, the public neighborhood school? In my opinion a public school is just that, public, yet we are turned away.

P. Nash
Azusa Street
Sacramento
Dear Mrs. Nash,

The problem of school boundaries concerns all South Natomas residents. We hope you and all others will contact SNCA News with regard to changing school boundaries.

Sincerely,
The Editors

Grow with
South Natomas

ARC Registration

Registration for spring semester classes continues until January 13 at American River College, Garden Valley Center, where 36 day and evening classes will be offered.

Dr. Bruce Kinghorn, Director, told the Advisory Committee at its fall meeting that 1047 students were enrolled, about two-thirds in evening classes. He is particularly impressed by the ability of the Center to be supportive to the student who is re-entering school. In the spring, testing services in reading and mathematics are planned so that students can make informed decisions about the classes they need. Also, a Head Start preschool program will operate each morning starting January 4.

The Center is becoming the starting point for some students on their way to a four-year college education and a place for others to study subjects that will improve their chances for job advancement, according to Dr. Kinghorn.

Class schedules and registration materials are available at the Garden Valley Center, 3601 Northgate Boulevard, telephone 920-3574.

American River College GARDEN VALLEY CENTER



3601 - Northgate Blvd.
Sacramento, CA 95834

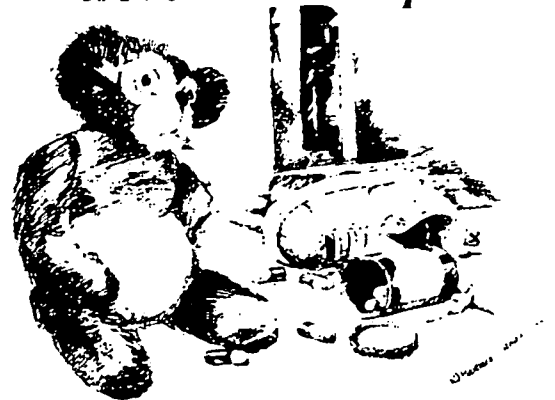
Spring Semester, 1982

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For more information call: 920-3574

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Looking Ahead

(Cont. from page 1)

perfected "space age" systems that will make it natural to use public conveyances, clearing our crowded thoroughfares of autos.

We see a long parkway the length of the Bannon Slough that will have bike and hiking trails, with nature-study stations and picnic nodes for families and others to enjoy a tranquil lunch.

We see other parks where children and adults can play. We hear no raucous stereo beat, see no cruising cars, because our young people will be "into" walking, running, biking.

We see community gardens, where people will grow their own vegetables. We see an enlarged "Small Farms" project, where those who wish can grow vegetables for profit on this marvelous soil.

We see an imaginative use of both the Main Drain and the East Main Drain canals, where pure water runs freely and fish thrive.

We see small clusters of elderly housing, near shopping and service centers, where our parents can spend their years independently caring for their own small gardens.

We see a forest of trees along the I-5 corridor, north all the way to the Sacramento River bridge beyond the airport, to act as a natural sound barrier and then be systematically harvested by the volunteers who planted this perennial fuel resource.

We see on the land north of I-880 an agricultural preserve that will never be lost to the speculators' urge to cover it with blacktop.

We see, guided by good planning practices, a tremendous growth of office parks, industrial complexes, factories and warehouses, all outside of North and South Natomas, on land better suited for that kind of development, in areas better suited to take that kind of traffic.

We see a City Council which clearly recognizes our indigenous problems, and will work with us in solving them.

We see all this as we dream about a better tomorrow for South Natomas...

Looking ahead ...

Robert V. Doyle
Executive editor

South Natomas Bus Line in Trouble?

Members of the South Natomas Community Association in January will take part in a door-to-door effort to educate the residents on the use of Regional Transit bus services, it was revealed this week by CBC Advertising, who has been selected by RT to assist in marketing the new 86 and 87 lines.

Because of poor patronage of the newly activated lines, which were achieved through the advocacy of the SNCA, transit authorities have threatened to discontinue the service, which winds through several new subdivisions. Line 14, which serves West El Camino, would continue as before, according to RT reports.

Research shows that less than 20 passengers per vehicle hour take advantage of the service; more than 70 percent drive alone to their workplaces.

A survey conducted by RT shows that 62 percent of those contacted in the South Natomas area were aware of the 86 and 87 bus lines. A further on-board polling of bus riders taken in October showed that only 29 percent worked downtown. Earlier surveys showed that more than 50 percent of South Natomas residents work downtown.

Only 40 percent of all riders use the bus as a means of getting to work, the majority of riders being students and people using the bus for shopping, visits to doctors' offices, and recreational purposes.

From these figures it was concluded that many South Natomas residents with downtown work-places know about the bus service, but for various reasons have not selected this mode of travel.

Current high-density housing patterns in South Natomas were authorized with the understanding that this would be a "transit oriented" community. Unless the residents use means of travel other than one-rider automobiles, planners say that traffic problems, particularly on the freeway off- and on-ramps, and on Garden Highway, Truxel and West El Camino, will multiply until they may become the worst in the County.

SNCA transit committee members have felt that the bus lines may not have been designed in a way to best serve the community, particularly in some of the newer tracts off of San Juan and west of Truxel. In its door-to-door contacts, SNCA members will issue information packets, and when possible offer suggestions to commuters.

Free bus tickets will be distributed, and instructions on how to ride the bus to work, how to use the bus for shopping, and how to transfer to other lines will be offered.

Emphasis will be placed on the main subject:

**PARK YOUR CAR AT HOME!
RIDE THE BUS!**

Slides

To convey to boards, councils and commissions the vision residents have of South Natomas, we have relied on people and their words. The SNCA Board at its December meeting felt that pictures might even tell more, and decided to sponsor a competition.

What is wanted are 35 mm slides that show South Natomas as it seems to the people who live here. Slides would be used for presentations to the public, so all submitted would be kept by SNCA. The winning entry, as determined by a photographer-judge, would be awarded \$25.

March 1 is the tentative contest deadline, with the hope expressed that there are some sunny days for photographers before then. Details for submission of entries will be in the next News.

Remember — there is no EASY WAY
without ORGANIZATION!

What's Jumping in January

- | | | |
|---------|---------------------------------|------|
| Jan. 5 | - City Council | 7:30 |
| Jan. 7 | SNCA Meeting | 7:30 |
| | Stanford Settlement | |
| Jan. 20 | SNCA Board of Directors Meeting | |
| | Stanford Settlement | |

TRAFFIC ANALYSIS
REVISED NATOMAS EASTSIDE
DEVELOPMENT PLAN

DECEMBER 1981

Prepared by

Joseph R. Holland
Traffic Engineer 687



TRAFFIC ANALYSIS
REVISED NATOMAS EASTSIDE
DEVELOPMENT PLAN

INTRODUCTION

The purpose of this analysis is to evaluate the traffic impacts of a revised development plan for the proposed Natomas Eastside development. This analysis is limited to the two nearby problem intersections identified in the South Natomas Business Parks EIR: the intersection of the I-5 Northbound offramp at West El Camino and the intersection of West El Camino with the new collector street, Natomas Oaks Drive.

This analysis uses as a starting point the traffic analysis work prepared to date as part of the EIR by CH2M Hill which evaluates the traffic impacts of the Natomas Eastside project alone. Using a revised development plan for the project (described below) new estimates of morning and afternoon peak-hour directional traffic flows are computed using the trip generation assumptions contained in the EIR. The differences in peak-hour flows of the revised plan versus the plan assumed by the EIR are then determined by comparison, and the resulting differences in peak-hour traffic levels at the two problem intersections are computed. Subtracting these differences from the peak-hour traffic volumes used in the EIR analyses, results in revised peak-hour traffic volumes which would be associated with the revised development plan.

It should be noted that the analysis herein makes use of the basic assumptions of the EIR regarding the following key aspects of the traffic analysis for the subject site:

1. Directional orientation of generated trips
2. Trip generation rates for specific land use types
3. Development density for specific land use types; i.e., dwelling units per acre and building square footage per acre
4. Trip assignment patterns to the local roadway network
5. Assumed level of transit usage
6. Method of computing critical lane volumes and intersection Levels of Service



This analysis departs from that of the EIR only in the instance of assumed intersection geometry and signal phasing for the W. El Camino/Natomas Oaks intersection. This departure reflects the assumption that W. El Camino will have three through lanes on its approaches to the intersection instead of only two through lanes, and it reflects a phasing scheme which is more efficient than that assumed by the EIR analysis and which is consistent with phasing practices used elsewhere within the City and County of Sacramento.

DEVELOPMENT PLAN REVISIONS

The revisions to the development plan which are considered by this analysis are revisions in amounts of the various land uses, but not revisions in the types of land uses. Generally the revised plan includes more residential area, less commercial area, and less office park area than the development plan considered by the EIR. The tabulation below details the two development plans for comparison.

| <u>Land Use</u> | <u>Per EIR</u> | | <u>Revised</u> | |
|-----------------------------|------------------|----------------|------------------|----------------|
| | <u>Net Acres</u> | <u>Amount</u> | <u>Net Acres</u> | <u>Amount</u> |
| Residential (22 du/acre) | 21 | 468 du | 48 | 1056 du |
| Commercial | 31 | 233,000 s.f. | 20 | 131,000 s.f. |
| Office | 106 | 1,900,000 s.f. | 90 | 1,515,000 s.f. |

The revision is accomplished primarily by replacing the commercial and office uses lying south of W. El Camino with residential use. Relatively minor changes are made to the portion north of W. El Camino.

TRAFFIC GENERATION COMPARISON

In comparing the traffic generation of the two development plans it was necessary to determine exactly what the assumptions of the EIR analysis were relative to the Natomas Eastside development alone. To this end, Mr. Wayne Kittleson of CH2M Hill was contacted, and it was determined that the land use assumptions used in the traffic generation estimate differ slightly from the actual development plan described in the EIR document. It is this consultant's opinion, however, that these discrepancies do not have a significant bearing on the overall results of the EIR's traffic impact analysis. The tabulation below presents these assumptions, the development plan as described in the EIR, and the revised development plan for comparison.



| <u>Land Use</u> | <u>Assumed by EIR Traffic Analysis</u> | <u>As Described in the EIR</u> | <u>Revised Plan</u> |
|-----------------------------|--|--|-------------------------|
| Residential (22 du/acre) | 638 du | 468 du | 1,056 du |
| Commercial | 320,000 s.f. | 233,000 s.f. | 131,000 s.f. |
| Office | 1,900,000 s.f. | 1,900,000 s.f. | 1,515,000 s.f. |

For the purposes of this analysis, the actual assumptions used in the EIR's traffic analysis are used for the basis of comparison with the revised plan, since those assumptions resulted in the projected traffic volumes used in estimating the future Levels of Service and, hence, traffic impacts.

Table I presents a comparison of the trip generation estimates for the development plan assumed in the EIR and the revised development plan for both the morning and the afternoon peak hours. This comparison indicates that the revised development plan can be expected to generate significantly less inbound traffic during the morning peak hour and significantly less outbound traffic during the afternoon peak hour. The afternoon inbound traffic is also lessened, but not to the extent of the morning inbound and afternoon outbound. The morning outbound traffic is virtually unchanged.

The reduced levels of morning inbound and afternoon outbound flows have the potential to result in significant changes in the projected traffic conditions at the two problem intersections. The following section evaluates the exact nature of any such changes.

TRAFFIC IMPACT COMPARISON

The changes in peak-hour directional flows estimated above have been used to estimate revised peak-hour traffic volumes at the two problem intersections. These revised volumes have then been used to estimate the critical lane volumes and resulting Levels of Service to result with the revised development plan.

Table II presents a comparison of the critical volume totals and Levels of Service at the two problem intersections as estimated by the EIR and as estimated herein. The results indicate that, with the plan revisions and with the revised geometry and phasing assumptions at the Natomas Oaks/W. El Camino intersection, significantly improved traffic conditions can be expected at the Natomas Oaks Dr intersection during both peak hours and at the I-5 NB Off-ramp intersection during the morning peak hour. The very good afternoon peak hour conditions estimated by the EIR for the I-5 NB Offramp intersection are maintained by the plan revisions. The



TABLE I

TRIP GENERATION COMPARISON

| REVISED DEVELOPMENT PLAN | | | AM PEAK HOUR | | | | PM PEAK HOUR | | | |
|---|-------|---------------------|-------------------|-------|-------------------|-------|-------------------|-------|-------------------|-------|
| | ACRES | AMOUNT ¹ | INBOUND | | OUTBOUND | | INBOUND | | OUTBOUND | |
| | | | RATE ² | TRIPS | RATE ² | TRIPS | RATE ² | TRIPS | RATE ² | TRIPS |
| RESIDENTIAL | 48 | 1056 DU | 0.1 | 106 | 0.4 | 422 | 0.4 | 422 | 0.2 | 211 |
| COMMERCIAL | 20 | 131,000 s.f. | 0.91 | 119 | 0.3 | 39 | 3.0 | 393 | 3.0 | 393 |
| OFFICE | 90 | 1,515,000 s.f. | 1.9 | 2879 | 0.4 | 606 | 0.3 | 455 | 1.4 | 2121 |
| TOTALS | 158 | | | 3104 | | 1067 | | 1270 | | 2725 |
| DEVELOPMENT PLAN ASSUMED IN EIR TRAFFIC ANALYSIS ³ | | | | | | | | | | |
| RESIDENTIAL | | 638 DU | | 64 | | 254 | | 255 | | 125 |
| COMMERCIAL | | 320,000 s.f. | | 195 | | 64 | | 640 | | 640 |
| OFFICE | | 1,900,000 s.f. | | 3610 | | 760 | | 570 | | 2660 |
| TOTALS | | | | 3869 | | 1078 | | 1465 | | 3425 |
| DIFFERENCE | | | | -765 | | -11 | | -195 | | -700 |

¹ Assumes: 22 d.u./acre residential
 6,543 s.f./acre commercial
 16,834 s.f./acre office
 per Table 27 page F-10 of EIR Addendum.

² Trips/1,000 square feet or trips/dwelling unit; from
 Table A1 page G-2 of Draft EIR.

³ Wayne Kittleson, CH2M Hill - See text.



COMPARISON OF TRAFFIC IMPACTS

| <u>LOCATION</u> | <u>LEVELS OF SERVICE AND PERCENT OF CAPACITY USED**</u> | | | |
|------------------------------------|---|----------------|---------------------|----------------|
| | <u>FROM EIR*</u> | | <u>REVISED PLAN</u> | |
| | <u>AM PEAK</u> | <u>PM PEAK</u> | <u>AM PEAK</u> | <u>PM PEAK</u> |
| NATOMAS OAKS DR/ WEST EL CAMINO | F/113.9 | F/141.3 | B/63.9 | D/79.1 |
| I-5 NB OFFRAMP/ WEST EL CAMINO | E/90.3 | B/62.3 | C/76.5 | B/58.1 |

* For Natomas Eastside development only.

** Level of Service scale:

| <u>LOS</u> | <u>Maximum Percent of Capacity Used</u> | <u>Conditions</u> |
|------------|---|-------------------|
| A | 55% | Best |
| B | 66% | |
| C | 77% | Design |
| D | 88% | |
| E | 100% | Worst |
| F | over 100% | |



worst conditions will be at the Natomas Oaks Dr intersection during the afternoon peak hour for which Level of Service D conditions are projected; however, the percentage of capacity used indicates that the intersection will operate in the lower (or better) end of the Level D range.

CONCLUSIONS

For the analysis scenario which evaluates only the Natomas Eastside business park development, with the remaining portion of the study area developing in accordance with the Community Plan, the following conclusions may be reached on the basis of the analysis presented above:

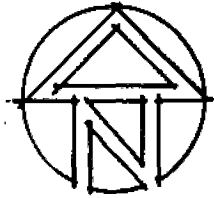
1. The revised development plan (with increased residential acreage and decreased commercial and office acreage) will result in significant reductions in peak hour trip generation.
2. This reduced level of trip generation will result in lower critical lane volume totals at the two nearby problem intersections identified in the EIR.
3. The reduced peak-hour flows, coupled with additional assumed approach lanes and more efficient assumed signal phasing at the Natomas Oaks/W. El Camino intersection, result in generally satisfactory or acceptable peak hour traffic conditions at the two intersections. Conditions will be those of Level of Service C or better, with the exception of the afternoon peak hour conditions at the Natomas Oaks Dr. intersection which will be marginally within the Level D range.

22



RESIDENTIAL - 48 ac.
COMMERCIAL - 20 ac.
OFFICE BLDG. - 90 ac.
FIRE STATION - 1.5 ac.

TOTAL -159.5 ac.



INTERSTATE 880

OFFICES

62 AC.
1,043,666 S.F.

INTERSTATE 5

RES.

23.5 AC.
517 UNITS

OFFICES

28 AC.
471,333 S.F.

COM.
1 AC.
6550 S.F.

COM.
1 AC.
6550 S.F.

COM.
2 AC.
13,100 S.F.

COM.

14 AC.
91,700 S.F.

COM.
2 AC.
13,100 S.F.

FIRE
STA.

1.5 AC.

RES.

10.5 AC.
231 UNITS

RES.

14 AC.
308 UNITS

NATOMAS EASTSIDE

TRAFFIC ANALYSIS
REVISED NATOMAS EASTSIDE
DEVELOPMENT PLAN

DECEMBER 1981

Prepared by

Joseph R. Holland
Traffic Engineer 687

TRAFFIC ANALYSIS
REVISED NATOMAS EASTSIDE
DEVELOPMENT PLAN

INTRODUCTION

The purpose of this analysis is to evaluate the traffic impacts of a revised development plan for the proposed Natomas Eastside development. This analysis is limited to the two nearby problem intersections identified in the South Natomas Business Parks EIR: the intersection of the I-5 Northbound offramp at West El Camino and the intersection of West El Camino with the new collector street, Natomas Oaks Drive.

This analysis uses as a starting point the traffic analysis work prepared to date as part of the EIR by CH2M Hill which evaluates the traffic impacts of the Natomas Eastside project alone. Using a revised development plan for the project (described below) new estimates of morning and afternoon peak-hour directional traffic flows are computed using the trip generation assumptions contained in the EIR. The differences in peak-hour flows of the revised plan versus the plan assumed by the EIR are then determined by comparison, and the resulting differences in peak-hour traffic levels at the two problem intersections are computed. Subtracting these differences from the peak-hour traffic volumes used in the EIR analyses, results in revised peak-hour traffic volumes which would be associated with the revised development plan.

It should be noted that the analysis herein makes use of the basic assumptions of the EIR regarding the following key aspects of the traffic analysis for the subject site:

1. Directional orientation of generated trips
2. Trip generation rates for specific land use types
3. Development density for specific land use types; i.e., dwelling units per acre and building square footage per acre
4. Trip assignment patterns to the local roadway network
5. Assumed level of transit usage
6. Method of computing critical lane volumes and intersection Levels of Service

This analysis departs from that of the EIR only in the instance of assumed intersection geometry and signal phasing for the W. El Camino/Natomas Oaks intersection. This departure reflects the assumption that W. El Camino will have three through lanes on its approaches to the intersection instead of only two through lanes, and it reflects a phasing scheme which is more efficient than that assumed by the EIR analysis and which is consistent with phasing practices used elsewhere within the City and County of Sacramento.

DEVELOPMENT PLAN REVISIONS

The revisions to the development plan which are considered by this analysis are revisions in amounts of the various land uses, but not revisions in the types of land uses. Generally the revised plan includes more residential area, less commercial area, and less office park area than the development plan considered by the EIR. The tabulation below details the two development plans for comparison.

| <u>Land Use</u> | <u>Per EIR</u> | | <u>Revised</u> | |
|-----------------------------|------------------|----------------|------------------|----------------|
| | <u>Net Acres</u> | <u>Amount</u> | <u>Net Acres</u> | <u>Amount</u> |
| Residential (22 du/acre) | 21 | 468 du | 48 | 1056 du |
| Commercial | 31 | 233,000 s.f. | 20 | 131,000 s.f. |
| Office | 106 | 1,900,000 s.f. | 90 | 1,515,000 s.f. |

The revision is accomplished primarily by replacing the commercial and office uses lying south of W. El Camino with residential use. Relatively minor changes are made to the portion north of W. El Camino.

TRAFFIC GENERATION COMPARISON

In comparing the traffic generation of the two development plans it was necessary to determine exactly what the assumptions of the EIR analysis were relative to the Natomas Eastside development alone. To this end, Mr. Wayne Kittleson of CH2M Hill was contacted, and it was determined that the land use assumptions used in the traffic generation estimate differ slightly from the actual development plan described in the EIR document. It is this consultant's opinion, however, that these discrepancies do not have a significant bearing on the overall results of the EIR's traffic impact analysis. The tabulation below presents these assumptions, the development plan as described in the EIR, and the revised development plan for comparison.

| <u>Land Use</u> | <u>Assumed by EIR Traffic Analysis</u> | <u>As Described in the EIR</u> | <u>Revised Plan</u> |
|-----------------------------|--|--|-------------------------|
| Residential (22 du/acre) | 638 du | 468 du | 1,056 du |
| Commercial | 320,000 s.f. | 233,000 s.f. | 131,000 s.f. |
| Office | 1,900,000 s.f. | 1,900,000 s.f. | 1,515,000 s.f. |

For the purposes of this analysis, the actual assumptions used in the EIR's traffic analysis are used for the basis of comparison with the revised plan, since those assumptions resulted in the projected traffic volumes used in estimating the future Levels of Service and, hence, traffic impacts.

Table I presents a comparison of the trip generation estimates for the development plan assumed in the EIR and the revised development plan for both the morning and the afternoon peak hours. This comparison indicates that the revised development plan can be expected to generate significantly less inbound traffic during the morning peak hour and significantly less outbound traffic during the afternoon peak hour. The afternoon inbound traffic is also lessened, but not to the extent of the morning inbound and afternoon outbound. The morning outbound traffic is virtually unchanged.

The reduced levels of morning inbound and afternoon outbound flows have the potential to result in significant changes in the projected traffic conditions at the two problem intersections. The following section evaluates the exact nature of any such changes.

TRAFFIC IMPACT COMPARISON

The changes in peak-hour directional flows estimated above have been used to estimate revised peak-hour traffic volumes at the two problem intersections. These revised volumes have then been used to estimate the critical lane volumes and resulting Levels of Service to result with the revised development plan.

Table II presents a comparison of the critical volume totals and Levels of Service at the two problem intersections as estimated by the EIR and as estimated herein. The results indicate that, with the plan revisions and with the revised geometry and phasing assumptions at the Natomas Oaks/W. El Camino intersection, significantly improved traffic conditions can be expected at the Natomas Oaks Dr intersection during both peak hours and at the I-5 NB Off-ramp intersection during the morning peak hour. The very good afternoon peak hour conditions estimated by the EIR for the I-5 NB Offramp intersection are maintained by the plan revisions. The

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| | <u>ACRES</u> | <u>AMOUNT¹</u> | <u>INBOUND</u> | | <u>OUTBOUND</u> | | <u>INBOUND</u> | | <u>OUTBOUND</u> | |
| | | | <u>RATE²</u> | <u>TRIPS</u> | <u>RATE²</u> | <u>TRIPS</u> | <u>RATE²</u> | <u>TRIPS</u> | <u>RATE²</u> | <u>TRIPS</u> |
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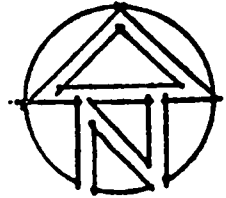
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NATOMAS EASTSIDE