



## CITY OF SACRAMENTO

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

MARTY VAN DUYN  
PLANNING DIRECTOR

MEMORANDUM

FEBRUARY 8, 1985

TO: Interested Persons

SUBJECT: Final EIR - South Natomas Community Plan Update and Related Projects

The City Planning Department is forwarding this document for a 7-day review period to persons who commented on the Draft EIR as indicated on the enclosed Final EIR distribution list. Commentators should determine if the responses to their comments are sufficient.

The Final EIR consists of an addendum containing comments on the Draft EIR and responses by the City to the comments, as well as an errata list of changes to be made in the Draft EIR. Both comments and responses are grouped by topic in the same order as the Draft EIR. The comments have been paraphrased from the commentators' letters and from the oral comments submitted at the Planning Commission meeting of December 6, 1984. Copies of the comments are included in Section IV.

The Sacramento City Planning Commission will consider the Final EIR, the Community Plan and the projects on February 27, 1985, beginning at 5:30 p.m. in the Council Chambers, City Hall, 915 I Street, Sacramento, California. Comments on either the Final EIR, the Community Plan and/or the merits of the projects should be submitted to the Planning Division prior to the public hearing.

Copies of this document have been forwarded to the following libraries to allow for public review: Central and Del Paso. A copy of the document may be reviewed or obtained at the City Planning Division.

If you have any questions regarding this matter, please telephone either Clif Carstens (449-5604) or myself (449-5381).

With regards,

Diana Parker  
Associate Planner

DP:lr  
Enclosure

SOUTH NATOMAS COMMUNITY PLAN  
AND RELATED PROJECTS

Sacramento City Council  
City Hall, Room 205  
915 I Street  
Sacramento, CA 95814

Water and Sewer Division  
City of Sacramento  
927 10th Street, Suite 201  
Sacramento, CA 95814

Sacramento County Environmental  
Section  
827 7th Street, Room 101  
Sacramento, CA 95814  
Attention: Al Freitas

Sacramento City Planning  
Commission  
927 10th Street, Suite 300  
Sacramento, CA 95814

Jack Crist, Finance  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

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

Walter J. Slipe, City Manager  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

Sacramento Union  
City Desk  
301 Capitol Mall  
Sacramento, CA 95812

County Department of Airports  
6968 Airport Boulevard  
Sacramento, CA 95837  
Attention: Larry E. Kozub

Mel Johnson, Director  
Department of Public Works  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

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

Air Pollution Control District  
3701 Branch Center Road, #219  
Sacramento, CA 95827  
Attention: Gary Glissmeyer

Jim Bloodgood, Traffic Engineer  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

Sacramento Central Library  
828 I Street  
Sacramento, CA 95814

Office of Planning & Research  
Clearinghouse  
1400 10th Street  
Sacramento, CA 95814

Officer J. A. Barclay  
Police Department  
813 6th Street  
Sacramento, CA 95814

Del Paso Branch Library  
115 Grand Avenue  
Sacramento, CA 95838

Air Resources Board  
Regional Program Division  
P. O. Box 2815  
Sacramento, CA 95812

Chief Robert McGrath  
Fire Department  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

The Library-Science/Tech  
CSUS  
200 Jed Smith Drive  
Sacramento, CA 95819  
Attention: E. Heaser

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

Robert Thomas  
Department of Parks & Community  
Services, City of Sacramento  
3520 5th Avenue  
Sacramento, CA 95817

Sacramento County Board of  
Supervisors  
Administration Building  
700 H Street  
Sacramento, CA 95814

California Department of Fish  
and Game  
1416 9th Street  
Sacramento, CA 95814  
Attention: John Turner

James P. Jackson, City Attorney  
City of Sacramento  
812 10th Street, Suite 200  
Sacramento, CA 95814

Sacramento County Planning  
Department  
827 7th Street, Room 120  
Sacramento, CA 95814

California Department of  
Transportation, Aeronautics  
1120 N Street  
Sacramento, CA 95814  
Attention: Planning & Program

California Department of Water  
Resources  
P. O. Box 388  
Sacramento, CA 95802  
Attention: Fred Danner

California State Water Quality  
Control Board, Central Valley  
3201 S Street  
Sacramento, CA 95816  
Attention: William Crooks

James E. Williams, Director  
Sacramento Area Council of  
Governments  
P. O. Box 808  
Sacramento, CA 95804

Regional Transit  
P. O. Box 2110  
Sacramento, CA 95810  
Attention: Gene Moir

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

Superintendent  
Natomas Union School District  
3700 Del Paso Boulevard  
Sacramento, CA 95834

Del Paso Heights School District  
575 Kesner Avenue  
Sacramento, CA 95838

Robla School District  
5248 Rose Avenue  
Sacramento, CA 95838

North Sacramento School District  
670 Dixie Avenue  
Sacramento, CA 95815

Grant Union High School District  
1333 Grand Avenue  
Sacramento, CA 95838

Capitol Bicycle Commuters  
Association  
P. O. Box 1541  
Sacramento, CA 95807  
Attention: David Brubaker

Environmental Council of  
Sacramento  
c/o Lung Association  
909 12th Street  
Sacramento, CA 95814

Stanford Settlement  
450 West El Camino Avenue  
Sacramento, CA 95833  
Attention: Sharon Wright

Native American Heritage Comm.  
1400 10th Street, Room 200  
Sacramento, CA 95814

South Natomas Community Assoc.  
P. O. Box 15362  
Sacramento, CA 95813

Sacramento Board of Realtors  
P. O. Box 160446  
Sacramento, CA 95816  
Attention: Collette Johnson

Sacramento Building Industry  
Association  
2211 Royale Road  
Sacramento, CA 95815  
Attention: Vince Lation

Christi Primm  
Hyde, Miller & Savage  
428 J Street, Suite 400  
Sacramento, CA 95814

Glen Fantazia  
Cook Company  
2020 Hurley Way, Suite 405  
Sacramento, CA 95825

Rob McCray  
Weissburg & Aronson, Inc.  
660 J Street, Suite 490  
Sacramento, CA 95814

Bob Bell  
Hefner, Stark & Marois  
555 Capitol Mall  
Sacramento, CA 95814

Bill Krum  
Natomas Corporate Center Asso.  
7919 Folsom Boulevard, #150  
Sacramento, CA 95815

Phil Angelides  
AKT Development Corporation  
7700 College Town Drive, #101  
Sacramento, CA 95826

Greg Rodgers  
Lee Sammis Company  
1451 River Park Drive, #110  
Sacramento, CA 95815

John Taylor  
McDonough, Holland & Allen  
555 Capitol Mall  
Sacramento, CA 95814

Daryll Chinn  
Vitiello-Niyya, Inc.  
1931 H Street  
Sacramento, CA 95815

Herman Lorenz  
Park El Camino, Ltd.  
1107 9th Street, Suite 880  
Sacramento, CA 95814

Bill Holliman  
McDonough, Holland & Allen  
555 Capitol Mall  
Sacramento, CA 95814

Karen Ahern  
Diepenbrock, Wuff, Plant and  
Hannegan  
455 Capitol Mall, Suite 800  
Sacramento, CA 95814

PRC Engineering  
89 Davis Road  
Orinda, CA 94563  
Attention: Gerald Walters

JHK & Associates  
Bay Bridge Office Plaza  
P. O. Box 3727  
San Francisco, CA 94119  
Attention: Charles M. Abrams

John Pitalo  
Morton & Pitalo, Inc.  
1767 Tribute Road  
Sacramento, CA 95814

Madelon Randall  
McCuen and Steele  
10969 Trade Center Drive  
Rancho Cordova, CA

## TABLE OF CONTENTS

	<u>Page</u>
Section I - PURPOSE AND FORMAT OF THE FINAL EIR	1
Section II - RESPONSES TO COMMENTS ON THE DRAFT EIR	3
Volume 1	3
Section A: Introduction	3
Section B: Project Description	4
Section C: Summary of Findings	5
Section D: Land Use	7
Section E: Population (No Comments Received)	19
Section F: Employment (No Comments Received)	19
Section G: Housing	19
Section H: Public Facilities and Services	19
Section I: Transportation	22
Section J: Air Quality	28
Section K: Noise	38
Section L: Energy	39
Section M: Geology and Soils	40
Section N: Hydrology, Drainage, and Water Quality	40
Section O: Biology	42
Section P: Aesthetics (No Comments Received)	42
Section Q: Cultural Resources	43
Section R: Fiscal Assessment	43
Section S: Cumulative Impacts:	
13 Applications Alternative	49
Section T: Cumulative Impacts:	
Five North Natomas Applica-	
tions Added to 13 Applications	
Alternative	50
Section U: Master Summary Table for 11 Project	
Applications Plus 11 Individual	
Summary Tables	50
Section V: References and Personal Communications	50
Volume 2	53
Capitol Business Park	53
Section C: Summary of Findings	53
Section H: Public Services and Facilities	53
Section I: Transportation	54
Capitol/80 Properties	58
Section C: Summary of Findings	58
Section I: Transportation	58
Section K: Noise	61
Community Hospital	61
Section A: Introduction	61
Section C: Summary of Findings	61
Section D: Land Use	64
Section I: Transportation	65

# TABLE OF CONTENTS - CONTINUED

	<u>Page</u>
Fong Ranch	66
Section H: Public Facilities and Services	66
Mercy Natomas Hospital	66
Section H: Public Facilities and Services	66
Natomas Corporate Center	66
Section B: Project Description	66
Section C: Summary of Findings	67
Section D: Land Use	71
Section G: Housing	72
Section H: Public Services and Facilities	73
Park El Camino	73
Section B: Project Description	73
River View Oaks	74
Section C: Summary of Findings	74
Section D: Land Use	75
Section H: Public Facilities and Services	76
Section I: Transportation	77
Section J: Air Quality	81
Section M: Geology and Soils	81
Section P: Aesthetics	82
Sammis Technology Center	84
Section C: Summary of Findings	84
Section I: Transportation	85
Willow Creek	89
Section D: Land Use	89
Section F: Employment	90
Section G: Housing	91
Section I: Transportation	92
ERRATA	99
Volume 1	99
Volume 2	104

## Section I

### PURPOSE AND FORMAT OF THE FINAL EIR

Under California Environmental Quality Act (CEQA) Guidelines, the City of Sacramento is required, after completion of a Draft Environmental Impact Report (DEIR), to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed 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. This Final EIR (FEIR) has been prepared to respond to the public agency, applicant, and general public comments received on the South Natomas Community Plan and Related Projects DEIR circulated for review in November 1984.

This document has been prepared in the form of an attachment or addendum to the DEIR as allowed by Section 15146(b) of the CEQA Guidelines. This document and the DEIR, herein incorporated by reference, constitutes the Final EIR. The following sections of this FEIR include:

- o City (the lead agency) responses to significant environmental points raised in the DEIR review process
- o An Errata presenting additional information prepared in response to comments
- o Copies of all written comments received on the DEIR and a summary of public testimony received at the DEIR public hearing.

City responses to comments on the DEIR have been separated by volume and section corresponding to the DEIR. Some comments have been paraphrased, and similar responses are occasionally cross-referenced to other responses to avoid duplication.

## Section II

### VOLUME 1

#### Section A: Introduction

##### A-1

Comment: Comment advises that the EIR was submitted to selected state agencies for review, that the review period is closed, that the FEIR must include all comments and responses, and that the certified EIR must be considered in the decision-making process for the project. Comment also notes that if the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect, and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect. (State Office of Planning and Research)

Response: Comments noted. No response necessary.

##### A-2

Comment: We have received from your agency notification of the project proposal referenced above. In accordance with areawide Clearinghouse procedures, we have forwarded your proposal to affected local jurisdictions and agencies for review and comment. Your project will not be reviewed by the Council or its committees. (June Holt; SACOG)

Response: Comment noted. No response necessary.

##### A-3

Comment: In general, the revision of this community plan is a substantial shift from a transit-oriented residential community closely linked to downtown, to an auto-oriented community with mixed land use. The resulting negative impacts on air quality and traffic circulation are significant. Much more can be done in the EIR, and the planning process to mitigate these native impacts. (Environmental Council of Sacramento, Inc.)

Response: Comment noted. The DEIR does address the changes in community character from the 1978 SNCP to the Draft 1984 SNCP (Section D, Land Use, pp. D-15 through D-21.) Impacts on Air Quality and Traffic were identified as significant



adverse impacts which could not be mitigated to a less than significant level. More specific points addressed by this commentor are found elsewhere in this Final EIR.

A-4

Comment: GENERAL COMMENTS ON VOLUME 1: In our opinion, Volume 1 is fairly comprehensive as it relates to the environmental issues arising out of the proposed 1984 South Natomas Community Plan. We have no quarrel with the discussions in the EIR except to those matters which relate to the Riverview Oaks property, which indicates the use of the property for residential purposes. We simply note our opposition to Volume 1 at this point since it is practically impossible to separate from the entire volume a small acreage such as River View Oaks and intelligently comment on the balance of the discussion. (Robert S. Willett; Hefner, Stark & Marois, on behalf of River View Oaks applicant)

Response: Comment noted. No response necessary.

#### Section B: Project Description

B-1

Comment: We request that the EIR consultant comment on that portion of the Draft Plan which calls for a narrow band of office development on a portion of the Willow Creek site adjacent to I-80. What the Draft Community Plan proposes will result in a "strip" office development one office building wide. The author of the Draft Plan felt that this was desirable for two reasons: (1) because of the importance of not locating residential development adjacent to major freeways, and (2) because the author believed that a "cluster" development would be more competitive with CBD. We concur with the view that residential development should not be located adjacent to I-80, but note the Kaiser/Marston Study prepared as a part of the DEIR states that even if the 8.1 million square feet of office development proposed in the 13 South Natomas applications were approved, there would be very little impact on the CBD. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan; representing the Willow Creek applicant)

Response: The locational principles used for designating office parks in the Draft 1984 SNCP included the following:

- o Freeway frontage is favored because visibility is an advantage to office parks
- o Office parks near freeways can minimize office-related travel through residential areas

- o The bands of office park adjoining freeways are limited to 400-500 feet in depth, which provides visibility of all sites from the freeway while limiting the amount of office space to reduce traffic capacity demand.
- o Sites west of I-5 are favored because available traffic capacity is greater, and an adverse impact of North Natomas development on traffic capacity will be less than on Truxel Road and Northgate Boulevard.

These locational principles appear to provide a well-reasoned, equitable approach to the distribution of office park designations within the South Natomas community. It should be noted that quite apart from market considerations, the amount of available traffic capacity was a constraining factor on the total amount of office space which could be developed.

## B-2

Comment: We think it extremely ill-advised to provide, as does the Draft Plan, for three (3) strips of different land uses (i.e., office, medium-density residential and low-density residential) in narrow bands. These will be extremely difficult to develop as cohesive communities. Please comment. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: The strip of office development along the freeway would buffer the residential uses from freeway noise. The band of medium density development adjoining the core low density residential area would act as a buffer between the office and low density residential uses. A cohesive community combining the low density residential areas, including patio homes, duplexes, and halfplexes with the medium density residential areas, including duplexes, patio homes, townhouses, and garden apartments, could be formed.

Other planned communities in Sacramento, such as Campus Commons, have successfully incorporated different densities in "strips" to buffer higher density uses from lower density uses.

## Section C: Summary of Findings

### C-1

Comment: We respectfully disagree with the finding in the DEIR that "conversion of agricultural land" is a significant adverse impact and one which cannot be mitigated. Even under a "no project" alternative, preservation of the remaining agricultural land within the South Natomas Community Plan area is no longer feasible in view of the urbanization of the area which has already occurred. More importantly, however, the decision that the South Natomas area should be urbanized was made many

years ago, subsequent to consideration of environmental assessments at that time and the Draft 1984 Community Plan does not result in any such impact. (William G. Holliman, Jr.; McDonough, Holland & Allen, on behalf of McCuen & Steele)

Response: CEQA requires that a DEIR assess impacts in relation to the existing environment (as well as in relation to future projected land uses). The conversion of agricultural land is, therefore, found to be a significant adverse impact. Since viable agricultural operations currently exist in South Natomas, the No-Project Alternative assumes preservation of existing agricultural operations.

The DEIR recognizes, however, that the significance of the impact is lessened in view of the fact that urbanization has been planned in South Natomas for some time and since encroaching urbanization makes continued agricultural operations more and more difficult. The impact, though lessened by the above factors, is still significant.

#### C-2

Comment: We disagree with the finding that six of the seven intersections described in the summary table, Exhibit C-5, will result in significant adverse impacts which cannot be mitigated to a less than significant level. (William G. Holliman, Jr.; McDonough, Holland & Allen)

Response: Comment noted. The conclusions about the intersections were based on detailed, well recognized traffic models.

#### C-3

Comment: The Draft Community Plan is intended to be a long-range plan within a much larger regional area which is undergoing significant change. The impacts are assessed for total build-out under existing conditions, as though such conditions will continue to prevail for the twenty-year life of the plan. The plan should also contemplate and provide for changes in existing conditions which are designed to avoid the impacts which would result if total build-out of the plan area were to occur instantaneously. (William Holliman; McDonough, Holland & Allen)

Response: Comment noted. Regarding the impact analysis, the DEIR does contemplate changes in existing conditions through its analysis of impacts of various development alternatives (e.g., build-out of the 1978 SNCP, cumulative impact analysis of the 13 Applications Alternative). The DEIR identifies whether the City could provide for the level of demand generated by the project(s) and explores alternative possibilities. In addition, throughout the DEIR, mitigation measures which would avoid adverse impacts have been formulated and discussed.

C-4

Comment: Reference to (page C-2: Growth Inducing Impacts) the comment that "[c]ontinued urbanization in South Natomas would create greater pressure to develop in adjacent areas, particularly North Natomas," should be substantiated. It is certainly plausible that certain types of development in South Natomas will reduce development pressures in North Natomas by offering alternative and equally attractive sites for development. It might also be noted that if continued urbanization in South Natomas increases development pressures in the adjacent North Sacramento community, that will generally be perceived as a favorable effect. (Robert B. McCray; Weissburg and Aronson, Inc. on behalf of Capitol/80 Properties Applicant)

Response: The commentor makes a valid point. Certain types of development, such as office and MRD, may reduce development pressures for the same land uses in North Natomas by offering alternative and equally attractive sites for development. The location of employment generating land uses in South Natomas may, however, increase the pressure for residential development in adjacent North Natomas as well as North Sacramento. As discussed in the DEIR, the effect will be a dual one: development of employment generating uses will create an indirect demand for new housing units in the area and the proposed uses will displace planned residential units.

C-5

Comment: (Reference to page C-3: Unavoidable Adverse Impacts). It should be noted that all six of the unavoidable adverse impacts identified will also occur, to some degree, under the existing South Natomas Community Plan. (Robert B. McCray; Weissburg and Aronson, Inc., representing Capitol/80 Properties applicant)

Response: Comment noted. Adverse impacts associated with the 1978 SNCP are identified throughout the DEIR under the 1978 SNCP Alternative.

Section D: Land Use

D-1

Comment: Due to the proximity of the Natomas Airport to several of the project sites, the impact of noise and safety from the airport on the project and the project's impact on an airport itself should be addressed. (Jack D. Kemmerly, Earl A. Tucker; California Department of Business, Transportation, and Housing Agency)

Response: The Natomas Air Park, located in the northeast quadrant of the intersection of I-5 and I-80, serves as a facility for general aviation. The Sacramento Area Council of Governments has established land use guidelines for areas surrounding airports, based on Federal Aviation Administration regulations. The guidelines restrict building heights and maintain approach safety zones around the facility. Two restricted building height zones are applicable to South Natomas, as depicted in the attached figure. Zone 2 extends 5,000 feet south from the runway and restricts building heights to 150 feet. Zone 1 extends 9,000 feet south from the runway and sets a building height restriction which ranges from 150-350 feet.

D-2

Comment: The concept of transferring development rights might provide a useful approach to achieving equity among landowners in developing a comprehensive plan for the total Natomas area. (James D. Boyd; California Air Resources Board)

Response: When the City retained the planning consultant to prepare the Draft South Natomas Community Plan, the consultant's charge was to prepare the plan revision without regard to property ownership. Consequently, transferring development rights from one landowner to another was not considered.

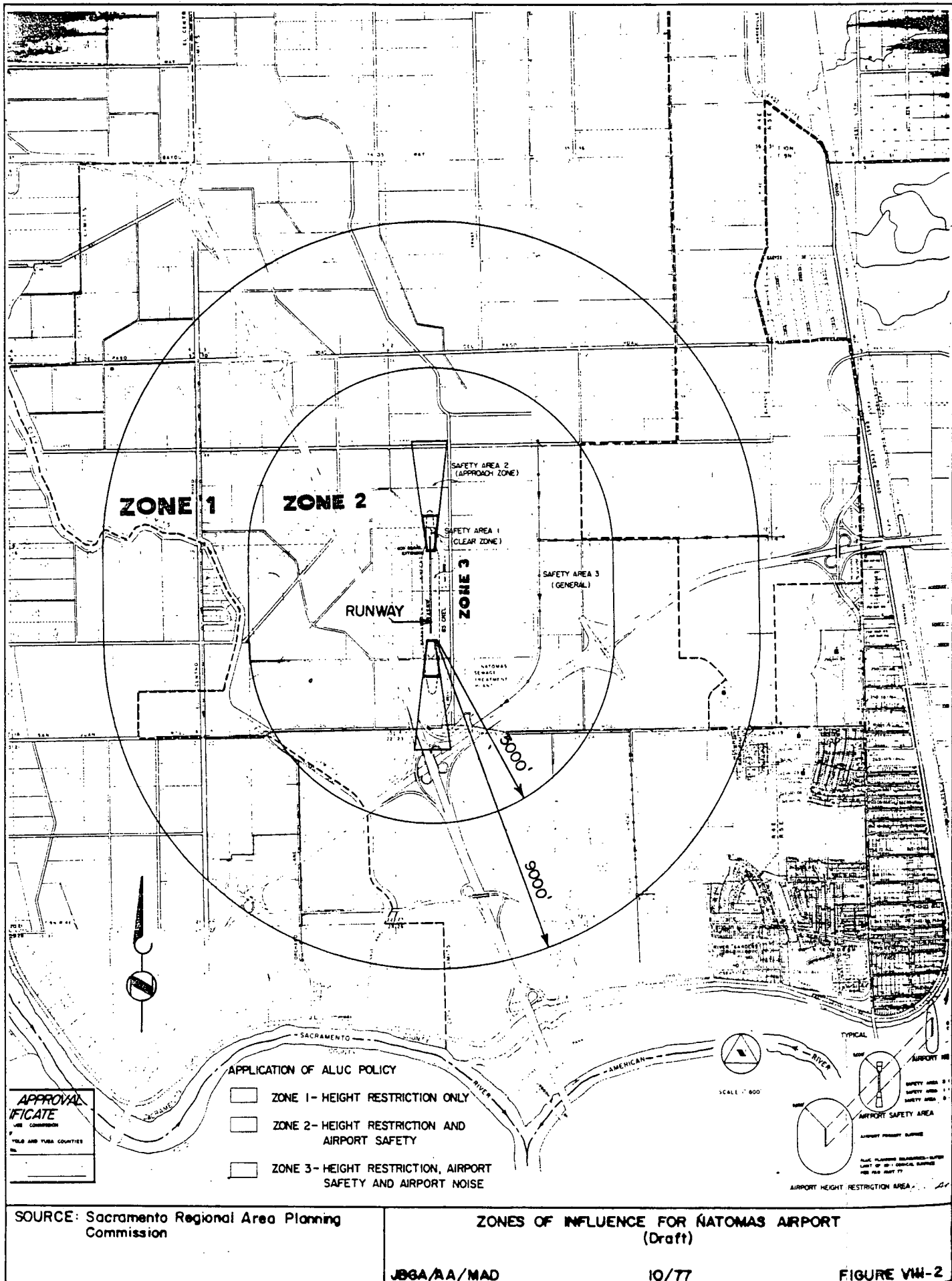
Although the transfer of development rights (TDRs) has proven to be a useful planning tool in some communities, they have not been widely used in Sacramento. Their use requires a substantial level of cooperation among landowners - cooperation that requires some landowners to forego development in one area in exchange for the right to develop elsewhere. Due to the market price of land in the South Natomas area, interest in TDRs would be difficult to generate.

However, in reviewing the professionally prepared land use plans, the City staff will consider opportunities for using TDRs in both South and North Natomas.

D-3

Comment: Implementation of the proposed plan would not appear to violate any height or safety requirements associated with the operation of Sacramento Metro Airport. (Larry Kozub; Sacramento County, Department of Airports)

Response: Comment noted. No response necessary.



D-1 RESPONSE

D-4 and D-5

Comment: Proposed development should not experience adverse aircraft noise exposure pursuant to the criteria established by Title 21, Chapter 2.5, Sub-chapter 6 of the California Administration Code (Airport Noise Standards). However, due to the frequency of Metro Airport Runway 16 departures and Runway 34 arrivals, future residents of South Natomas may eventually complain about the frequency of aircraft overflights and perceive a higher level of aircraft noise than actually exists due to the visual observation of these overflights. Case history supporting this contention is documented by noise complaints received by the Department of Airports from the current residential community in South Natomas.

Average aircraft departure performance (large commercial jets) from Runway 16 would normally place aircraft approximately 3,000 feet above ground level at the centroid of proposed development. Aircraft arrivals to Runway 34 will generally vary from 1,800 feet to 2,500 feet. Commercial jet overflight frequency ranges from approximately 10 per hour during peak periods to about 2 per hour during off-peak periods. The anticipated growth in air transportation will intensify overflight frequency and possibly shift peak periods of operation.

Based on these overflight considerations, the presence of aircraft over the South Natomas population should be brought to the attention of future homeowners and residences. This notification could be secured through an aviation-noise easement granted to Sacramento County (Department of Airports) as a condition of the use permit for home, apartment, or condominium construction and would serve as acknowledgement that aircraft overflights caused by the use of Metro Airport would traverse airspace directly above their property. A sample aviation-noise easement is attached for your review and consideration. It should be noted that the draft easement has received review and approval from the Federal Aviation Administration and Caltrans, Division of Aeronautics, and has been accepted as a condition of use permits approved by the Sacramento County Board of Supervisors for the Sand Cove and River View condominium projects, which are also located in South Natomas. See attachment as follows. (Larry Kozub; Sacramento County, Department of Airports)

Response: Comments noted. The City will consider aviation and noise easements during the project approval process.

D-6

Comment: It is unclear how the revision to the South Natomas Community Plan fits into the overall plan for the City's growth. How are these changes articulated with the community plans for downtown? Arden, Point West, North Sacramento, and North Natomas? (Environmental Council of Sacramento, Inc.)

# COMMENT D-4 and D-5 attachment

\* \* DRAFT \* \*

## GRANT OF AVIGATION AND NOISE EASEMENT

(Name of Property Owners) hereinafter called GRANTOR, for themselves, their heirs, administrators, executors, successors and assigns, does hereby grant to the County of Sacramento, a political subdivision of the State of California, its successors and assigns hereinafter called GRANTEE, in consideration of (land use permit or property rezoned as appropriate) approved on (date) the receipt and sufficiency of which is hereby acknowledged, a perpetual avigation and noise easement as follows:

1. Description. The easement shall be an easement on, over, and upon that certain real property commonly known as (i.e. xyz condominiums or assessor's Parcel No. 123-45-678 as appropriate) situated within the County of Sacramento (or the County of Sutter, or the County of Yolo as appropriate) described in Exhibit A and outlined on property map Exhibit B attached hereto and by this reference incorporated herein.
2. Benefit. The easement shall be appurtenant to and for the benefit of all the real property comprising the Sacramento Metropolitan Airport hereinafter called AIRPORT, and such other additional property or interest therein as shall be subsequently acquired or designated from time to time by GRANTEE or its successors as constituting a part of the AIRPORT. The easement shall be for the benefit of GRANTEE and all other persons and entities who directly or indirectly use the easement as a result of any type of use of



the property and facilities constituting the AIRPORT, including aviation ground and flight operations.

3. Use and Purpose. The easement shall be used for the unobstructed passage of all aircraft now known or hereafter invented, used or designed for navigation of or flight in the air by whomsoever owned and operated in the airspace above GRANTORS' property above (height restrictions as appropriate) together with the right to cause in all airspace above GRANTORS' property such noise, vibration, fumes, dust, fuel particles, and all other effects that may be caused by the operation of aircraft landing or taking off from or operating at or on AIRPORT. GRANTOR does hereby confirm that all such uses of the airspace shall be without any liability of GRANTEE or of any other person or entity entitled to the benefits of this easement, to GRANTOR, GRANTOR'S heirs, assigns or successors in interest to all or any part of the property or any interest therein or to any other person or entity using or located on or in the area subject to the easement, for damage to property or physical or emotional injury to persons, animals or any other living thing, the diminution in value of any personal or real property, discomfort or inconveniences of any type of kind to any person or things, or interference with television, radio or other types or kinds of electrical reception, transmissions or activities in the easement; and GRANTOR, for itself and on behalf of the GRANTOR'S heirs, assigns or successors in interest to all or any part of the property, or any interest therein and each person or entity using or located on or in the area subject to this easement, hereby releases

and discharges GRANTEE and all persons and entities entitled to the benefits of the easement from all claims, demands, actions and causes of action of all types or kinds, known or unknown, existing or which might be created hereafter by statute or case decision, airing out of any of the foregoing described injuries or damages resulting from the use of this easement by GRANTEE and any other person or entity entitled to the benefits of this easement.

4. Right of Ingress/Egress. The easement herein granted includes the continuing right of the GRANTEE to prevent the erection or growth upon GRANTORS' property of any building, structure, tree, or other object extending into the airspace above (height restriction as appropriate) and to remove from said airspace, or at the sole option of GRANTEE, as an alternative, to mark and light as obstructions to air navigation any such building, structure, tree or other object now upon or which in the future may be upon GRANTORS' property, together with the right of ingress to, egress from, and passage over GRANTORS' property for such purpose.

5. Presumption. Notwithstanding previous sections of this grant of easement, there is hereby created an irrefutable presumption that this grant of easement is so over-burdened by unreasonable use that its purpose is defeated if the noise which impinges on the GRANTORS' property exceeds an amount equal to or greater than 3.0dB Community Noise Equivalent Level above that level described in subsection (a) of this section and GRANTOR may seek a court finding that the easement is extinguished;

- a. The annual Community Noise Equivalent Level reflected on the latest map for the AIRPORT validated by County of Sacramento and filed with the California Department of Transportation, Division of Aeronautics and United States Department of Transportation, Federal Aviation Administration.

6. Exemption

The provisions of this section shall not apply to the use or operation of aircraft owned by the United States or in times of National emergency or National defense as may be declared by the President of the United States.

7. Negligent Operation of Aircraft. This grant of easement shall not deprive the GRANTOR, his successors or assigns, of any rights that it may from time to time have against any individual a private operator of an aircraft for negligent or unlawful operation of aircraft.

8. Term of Enforcement. This grant of easement shall continue in effect until AIRPORT shall be abandoned and shall cease to be used for public purposes.

DATED \_\_\_\_\_

BY \_\_\_\_\_

\_\_\_\_\_

---

(NOTARIAL ACKNOWLEDGEMENT)

---

---

---

(GRANTOR)

(SEAL)

Response: The South Natomas Community Plan, when adopted, will become a part of the City General Plan. Consequently, in preparing the Draft Plan and DEIR the consultants have considered the relationship to other community planning areas within the City.

Both the Draft Plan and the DEIR have carefully considered the effects on Downtown Sacramento. As pointed out in Section R, Fiscal Assessment, the market study prepared by Keyser Marston analyzed the effects of South Natomas development on the downtown office market and concluded that such effects would be minimal. Additionally, in Section G, Housing, the DEIR indicates that one of the features that makes the South Natomas housing market unique is its close proximity to downtown. This is one of the reasons that the Draft Plan recommends a substantial quantity of new housing in South Natomas.

The DEIR also considered the relationship of the Draft Plan with several City Plans and policies including the 1974 General Plan, the 1980 Central City Plan, the 1980 Housing Element, and the 1982 Growth Policy Conclusions and Recommendations (see Section D, Land Use, pages D-15 and D-16).

Although the North Natomas and South Natomas Community Plans are being prepared by different consulting teams, there is a substantial effort being made in both the South and North Natomas EIRs to analyze the combined impacts. For example, Section T, Cumulative Impacts, has considered the effects of five North Natomas development applications together with those of South Natomas. Similarly, when the North Natomas EIR is completed, the proposed South Natomas Community Plan will be included in the cumulative impact analysis.

The Point West and Arden areas of Sacramento have been planned for many years (since 1965). There has been active and continuous development that is consistent with the future development planned for South Natomas.

The North Sacramento Community Plan adopted in 1983 is designed to encourage labor-intensive industrial employment which would not compete with the proposed office employment in the South Natomas area.

D-7

Comment: The changes proposed by the Draft 1984 SNCP are not consistent with the existing General Plan. (Environmental Council of Sacramento, Inc.)

Response: The DEIR recognizes areas of consistency as well as inconsistency with the current General Plan. As stated on page D-15 of the DEIR, the 1974 Sacramento General Plan designates South Natomas for predominantly residential land uses with

neighborhood-oriented commercial and public facilities land uses. The General Plan also states that incompatible commercial development adjacent to the American River Parkway is to be prevented. Revitalization of the CBD is also stressed.

As stated on page D-16, the inclusion of office space in South Natomas, beyond that needed to immediately serve the residents in the Community, is the most significant overall change in land use in the Draft 1984 SNCP as compared to the previous community plan. However, as discussed, the uses proposed in the Draft 1984 Plan are not expected to adversely affect the marketability of office space in the CBD (Keyser Marston 1984b). Therefore, the Draft Plan is not considered inconsistent with General Plan policies which stress revitalization efforts in the CBD.

Further, as described on page D-16, the Draft Plan is consistent with General Plan policies concerning the provision of an adequate and affordable housing stock and in encouraging infill development in Gardenland. As noted on page G-8 of the DEIR, the Draft 1984 SNCP would provide an additional 2,928 units (at build-out), above that envisioned by the previous community plan.

#### D-8 and D-9

Comment: The DEIR fails to identify mitigation measures in the area of agricultural land preservation. The Commission should direct staff and consultants to come up with further mitigation measures and to analyze their costs and benefits. It may be necessary to hold a public workshop, and to review the public testimony given at the Urban Development Task Force Meetings on Agricultural Land and Open Space Preservation (November 26).

With respect to loss of agricultural land, we believe that whenever productive agricultural land is converted to urban use, developers should be required to purchase development rights on equivalent acreage elsewhere in the County, and donate those development rights to a public trust administered by a nonprofit organization. This is an appropriate mitigation measure and should be part of the EIR. (Environmental Council of Sacramento, Inc.)

Response: The DEIR did not identify mitigation measures for the loss of prime agricultural land because there is no feasible mitigation available for this loss. To require developers to purchase development rights on equivalent acreage elsewhere in the County and donate those development rights to a public trust administered by a nonprofit organization, as suggested by the commentor, would only partially mitigate the loss. The purchase of development rights would provide compensation for the removal of land from agricultural production. It would not, however, mitigate for the loss of

prime agricultural land, which is a limited and diminishing resource. Unless prime agricultural land is created on land that is not currently considered prime, the impact of development on prime farmland will be significantly adverse, with no feasible mitigation that would bring the impact to a less than significant level.

D-10

Comment: (Reference to page D-7: Mixed Dwelling Type Requirement): An additional adverse impact of the Draft 1984 SNCP is caused by its limitation on maximum average densities and the size of multi-family clusters. By increasing the amount and therefore the cost of land required for each dwelling unit, the limitation on maximum densities may increase South Natomas housing costs. This factor may adversely affect the ability of persons employed in South Natomas to afford housing in that community. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Capitol/80 Properties)

Response: Comment noted. No response necessary.

D-11

Comment: Because of site constraints and existing PUD restrictions, reducing the commercial development of the Westersund parcel (located at the northwest corner of Old San Juan Road and Northgate Boulevard) to a 6-acre site may result in "strip" commercial development, which has been identified by the Blayney Proposal itself as a serious problem on Northgate Boulevard. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Mr. and Mrs. Frank Westersund)

Response: The charge given to the independent planning consultant was to prepare the plan revision without regard to property ownership. Although the Draft Plan designates only 6 acres of the Westersund parcel for neighborhood commercial development, a small piece of adjacent property located at the southwest corner of Old San Juan Road and Northgate Boulevard is also designated for neighborhood commercial use. The subject site would likely be suitable for a single anchor tenant (a supermarket or drug store) plus ancillary commercial establishments.

D-12

Comment: Reduction of commercial development on the Westersund parcel would result in the project being suitable for only a single rather than two "anchor" tenants. Therefore, a shopping center at that location would be less attractive to shopping center developers because it would be less desirable

and useful for nearby residents, including residents of the northwestern portion of the North Sacramento community. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Mr. and Mrs. Frank Westersund)

Response: Refer to the response to Comment D-11 above. Anchor tenants could be located on opposite sides of the re-aligned San Juan Road, though this may require cooperative ventures among different landowners.

#### Section E: Population

(No comments received.)

#### Section F: Employment

(No comments received.)

#### Section G: Housing

##### G-1

Comment: (Reference to page G-4: Indirect Impacts) It appears that this section of the DEIR was taken directly from the Creekside Oaks/Gateway Centre DEIR. It does not address issues raised by the Draft 1984 South Natomas Community Plan. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Capitol/80 Properties)

Response: Comment noted. Refer to Errata to Volume 1, pages G-4 and G-5. References made to the Creekside Oaks/Gateway Centre projects have been deleted. The information, however, does pertain to the Draft Plan.

#### Section H: Public Facilities and Services

##### H-1

Comment: Park allocation should meet the citywide standard. (Environmental Council of Sacramento, Inc.)

Response: Comment noted. The DEIR identifies the fact that the Draft 1984 SNCP falls 91 acres short of City Master Plan Standards, and recommends several mitigation measures to increase park acreage. Refer to Section H, Public Facilities and Services, pages H-36 and H-37.



## H-2

Comment: The school site and the park site designated by the Draft Plan on the Willow Creek site are bisected by a high tension power line and by a high pressure gas line located directly beneath the property. We ask the EIR consultant to consider the advisability of locating a school and a park on sites traversed by high tension power lines and above high pressure gas lines. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan on behalf of Willow Creek project applicant)

Response: PGandE has a 115 kV line on towers above their existing right-of-way approximately 400 feet south of West El Camino Avenue. PGandE also has a gas main located in this area. SMUD has a 69 kV subtransmission line in approximately the same location. Buildings on the proposed park and school sites may not be constructed on the PGandE right-of-way. Neither the gas main nor the electrical lines present safety concerns for adjacent school or park use (Pearson pers. comm.). The location of the school site on the Draft Plan map is only approximate, so shifting buildings to avoid the right-of-way is certainly possible during review of specific projects.

## H-3

Comment: We ask that the EIR consultant consider the advisability of moving the park site south so that it is across from the waterfront development along the Sacramento River. We think it makes sense to locate the park where the residents can also take advantage of the many amenities along the Sacramento River. There is an additional benefit: park sites adjacent to the Garden Highway will help preserve this area adjacent to the Sacramento River in a natural setting and will enhance the recreational potential of the Sacramento River and its environs. (Karen O. Ahern; for Diepenbrock, Wulff, Plant & Hannegan)

Response: Relocating the park site to Garden Highway may be inconsistent with the guiding policy in the proposed plan (page 50 of the Draft 1984 SNCP) of locating new community parks on highly visible sites where they will make contributions to community form and quality. In addition, a park site has already been designated at Gateway Oaks Drive and Garden Highway. See Response to Comment H-4.

## H-4

Comment: As to the advisability of a school and park site near heavily-traveled West El Camino Avenue, we ask that the EIR consultant consider the comments on this topic made by Mr. Gene Robinson, Director of Parks and Community Services, who testified at public hearings on the Draft Plan in opposition to locating parks near major arterials. His view is that the

community residents are better served by parks which are pulled back from major streets so that the bulk of the park site can be utilized and where children are not at risk because of heavily-traveled adjacent streets. We think this makes sense and ask the EIR consultant to consider relocating the park to a southerly location near the Garden Highway and the Sacramento River. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: Mr. Robinson's views were carefully considered in preparing the Draft Plan. Alternative philosophies for park locations are stated on page H-34 of Volume 1 of the SNCP:

"In preparing the park recommendations for the Draft 1984 SNCP, the planning team considered two conflicting viewpoints regarding the location of parks. Some park planners feel that community parks should be highly visible and located on major thoroughfares. Such a location enables the park to contribute to the identity of the community and encourages greater use. In Sacramento, McKinley and Land Parks are examples of this philosophy.

Other park planners feel that community parks should be located in out-of-the-way places to discourage greater use, so that those who do use the parks have greater opportunities for peace and quiet with less crowding. These planners feel that the enjoyment of park users is diminished by locating the park adjacent to main thoroughfares. They further argue that prominent parks require more land to buffer recreational use areas from the main thoroughfares and have a higher maintenance cost due to greater usage and additional vandalism.

After weighing the pros and cons of each of these philosophical positions, the community plan favors the more prominent location of community parks. This policy is recommended because of the need to create a prominent identity for the South Natomas community."

#### H-5

Comment: By placing the school site just south of West El Camino Avenue, the Draft Plan leaves a 3-acre "remnant" of residential property which will be extremely difficult to develop. This "remnant" parcel is so small that it will be difficult to create a true "community" of homes and the size of the parcel does not provide the developer with any flexibility in the location of amenities or in the layout of the residences. Please comment. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: The Draft 1984 SNCP states on page 5 that circles are used to indicate approximate locations of school and park sites, except for three park sites that are located on major streets to serve as elements of community urban design.

Since the specific location of the school site has not been determined, it is premature to speculate about difficulties that may be encountered in developing adjacent residential property. Locating the school site in one of the corners of the property would avoid this problem altogether. The precise location of schools and small parks will be considered during review of specific projects.

## Section I: Transportation

### I-1

Comment: We are concerned about the significant impacts to State Highway facilities, as identified in the document. Impacts for which there are no available mitigation measures are anticipated at the following locations: West El Camino Avenue/Northbound Interstate 5 off-ramp, Garden Highway/Northbound Interstate 5 ramps, and Interstate 5 mainline across the American River. The proposed development in North Natomas will further compound these impacts. It is likely that ramp metering will be required. (California Department of Transportation)

Response: Comment noted. No response necessary.

### I-2

Comment: The City should also consider alternative land use scenarios to reduce the impacts to State Highways. In some cases capacity deficiencies cannot be mitigated by roadway improvements. However, one possible improvement that could be considered is the extension of Truxel Road across the American River as an alternative route to Interstate 5. (California Department of Transportation)

Response: Comment noted. The possibility of extending Truxel Road across the American River will be studied in greater detail as part of the North Natomas Community Plan.

### I-3

Comment: The document identified Transportation Systems Management (TSM) actions as a means to alleviate capacity deficiencies while maintaining the proposed land use intensity. Since a 15 percent trip reduction rate has already been assumed for TSM, it is unlikely that even "severe and restrictive" TSM actions will achieve additional, significant reductions. (California Department of Transportation)

Response: Comment noted. No response necessary.

I-4

Comment: The document assumes certain State Highway improvements to be in place by the year 2000. The majority of these improvements will likely need to be funded by nonstate sources. (California Department of Transportation)

Response: Comment noted. The City recognizes the need to make funding decisions for future highway improvements and will consider this issue during the review and implementation of the Draft 1984 South Natomas Community Plan.

I-5

Comment: The DEIR proposes reducing work-related trips by future employees working in South Natomas by 15 percent as required by the City of Sacramento TSM Plan. We suggest the specific methods by which vehicle trips and emissions from future site development will be mitigated be included in the Final Environmental Impact Report (FEIR). Given current financial constraints, it cannot be assumed that transit service, bikeways, light rail access, or ride-share matching will be available to future residents and employees without participation by the property owners in meeting the construction and operating costs of providing these services. (California Air Resources Board)

Response: The City of Sacramento requires, through an ordinance, that developers implement measures for reducing work-related vehicle trips to and from their developments by 15 percent. At the time each development is presented for review, a specific strategy (or strategies) for responding to this requirement must be set forth. It is beyond the scope of this plan-level DEIR to identify the specific set of strategies that each project should employ in order to meet the requirements of this ordinance.

I-6

Comment: Since South Natomas was designed as a transit-oriented community, it should continue to embrace transit considerations and fully reflect these in the Draft 1984 Plan's concept. In that regard, Regional Transit (RT) supports the implementation policies of the Plan (Page 43) and the mitigation of the DEIR (Pages I-16 through I-17). These include increasing public and/or private subsidies to RT, recognizing transit needs in project design, providing shelters and turnouts as needed, and providing transit centers as needed. (Sacramento Regional Transit)

Response: Comment noted. No response necessary.

I-7

Comment: With respect to increasing subsidies, RT staff is developing a cost-estimation concept and formula in which new developments would "buy in" to the RT bus system based upon the proportion of trips generated by any given project as compared to total number of trips in the Sacramento region. Each development would provide funds for capital and operating costs utilizing RT's capital investment and operating budget at the time of project approval as the basis for the "buy in" estimates. This approach offers an equitable and simple way for developments to provide for the increased demands they place upon the transit system, which can not be met unless additional resources are made available. (Sacramento Regional Transit)

Response: Comment noted. No response necessary.

I-8

Comment: Commenting on the policies and mitigation measures included in the Draft Plan and EIR, RT would like to suggest that right-of-way for the proposed Natomas/Airport Light Rail Transit (LRT) be provided. In developing transit service proposals for North Natomas, RT staff has examined, preliminarily, some LRT alignments through both South and North Natomas. One alignment proposed by the North Natomas study consultant runs from Northgate Boulevard to Metro Airport via Del Paso Road and Interstate 5. RT staff considers that at least one other alignment should be explored. An alternative alignment, which the District sees as meriting attention, runs from Northgate Boulevard to Metro Airport via Garden Highway, Truxel Road, Del Paso Road and Interstate 5. This Truxel alignment appears to offer much better access opportunities in South Natomas as well as operating through areas proposed for more intensive land uses in North Natomas. The operational success of the system will be enhanced by having the improved access and major trip attractions along the Truxel route.

It is suggested that both alignments be shown as alternatives in the Community Plan. Additionally, right-of-way for the track and potential stations should be dedicated as development projects are improved along the alignments. This is particularly important in South Natomas since the community is more developed. From the experiences of developing guideway projects in Sacramento and elsewhere, it has become apparent that unless future right-of-way can be preserved, the feasibility of ever developing a light rail line will be significantly diminished. (Sacramento Regional Transit)

Response: Comment noted. Various conceptual alignments for a light rail right-of-way are being considered in the planning for the North Natomas area. Light rail was not included in the South Natomas Community Plan because the

consultants did not feel that the development of South Natomas alone justified a light rail extension. The North Natomas Community Plan will consider light rail extension to serve the entire Natomas area; however, the Plan will not designate specific routes. Route adoption would not occur until the light rail planners undertake separate, more detailed studies.

I-9

Comment: RT would also like to suggest that developers be required to contribute the needed local match for LRT development costs, based on the percentage of estimated future usage. RT views this as imperative. Recent changes in state and federal funding regulations for new guideway projects require a significant local match of funds for project approval, even for the most meritorious proposals. Since local public funds are already stretched to their limits, and since there is a very low likelihood of obtaining two-thirds voter approval for a transit sales tax, RT urges that new projects be required to participate in the local share of LRT development costs. (Sacramento Regional Transit)

Response: Comment noted. No response necessary.

I-10

Comment: Traffic generation rates should be held to the City-wide standard. (Environmental Council of Sacramento, Inc.)

Response: The trip generation rates used within this EIR are consistent with the City's standards.

I-11

Comment: We would note that the study assumptions and the modeling assumptions used to do the traffic analysis may not be adequate for a reasonable estimate of traffic impacts. Assumptions on page 42 of the Draft SNCP appear self-contradictory. Traffic model assumptions about household composition and linked trips may be outdated since these patterns have changed substantially in the last 10 years. If so, estimating and mitigating traffic congestion for new growth is a more difficult task than assumed. The risk of planning a new community based on old household patterns and needs, rather than emerging household patterns and needs, can be reduced considerably at this stage in the planning process through careful analysis by the Planning Commission. (Environmental Council of Sacramento, Inc.)

Response: Page 42 of the Draft 1984 SNCP identifies factors tending to cause projected volumes to be too high, and also

factors tending to cause projected volumes to be too low. One of the factors noted that tends to cause projected volumes to be too high is that the traffic model assumes full build-out of the South Natomas area, with no vacancy. At the same time, the model assumes that no traffic will be generated by urban development immediately north or west of I-80; thus, new nonresidential development proposals in these areas would compound South Natomas' traffic problems beyond those identified in the DEIR. These assumptions are not self-contradictory, but do tend to pull the projected traffic volumes for the South Natomas area in opposite directions. To some degree, then, these factors should tend to balance each other out.

Subsequent to the completion of the traffic analyses described within the DEIR, a comprehensive review was conducted of the traffic model's assumptions regarding the average number of employees per household and also the internal/external split of projected vehicle trips. This review was conducted using data collected by the Sacramento Council of Governments (SACOG) as part of their validation efforts for the regional transportation model. The results of this analysis indicated that the traffic modeling assumptions used within the DEIR are consistent with the most recent available data.

#### I-12

Comment: On page I-9, the DEIR notes that the traffic impact model failed to take out-of-direction travel into account. This is especially significant with regard to development activities on Northgate Boulevard near Interstate 80. The model assumes that all commuters to and from such development with destinations or points of origin to the south of the community will travel down Northgate Boulevard and through one or both of the most congested intersections in the community at El Camino and Garden Highway. It should be acknowledged that many, if not most, of such commuters would prefer to take a short out-of-direction drive and thus use Interstate 5 and Interstate 80 to reach their ultimate destination. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of project applicants)

Response: See response to Volume 2 comment I-2 on the Capitol Business Park DEIR. The travel demand forecasting model assumed that most commuters to and from the northeast part of South Natomas would use Interstate 5 and Interstate 80 to reach many of the points south of the community. See also the response to Volume 2, comment I-3 on the Capitol/80 Properties EIR.

#### I-12A

Comment: The DEIR uses existing City policy to determine that a significant adverse transportation impact occurs when

traffic volume at an intersection exceeds the C level of service for however brief a time. While this assumption may or may not be required by law, it should be noted that in many urbanized jurisdictions, including the County of Sacramento, peak hour D levels of service are acceptable. This may be because higher urban densities generate increased traffic flow, and it is often prohibitively expensive to develop all traffic improvements to a point which is adequate to avoid a D level of service for even short periods of time on weekdays. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of project applicants)

Response: It is irrelevant that service levels in the D range may be common during peak hours in most developed areas, and may be considered acceptable by many urban and suburban communities. The relevant fact is that current City policy dictates that a "C" level of service is the minimum acceptable LOS for any peak hour at any intersection within the South Natomas community. It should also be noted that the DEIR acknowledges "...situations may occasionally arise in which the LOS is only marginally unacceptable. In these borderline intersections, a level of 80 percent of the intersection's available saturation capacity may be considered a marginally acceptable LOS."

It should also be noted that the DEIR applies this City policy consistently to all evaluated alternatives, including the 1978 SNCP Alternative. Because of this consistency in application, comparisons among alternatives are unaffected by this issue.

#### I-13

Comment: We are greatly concerned about the proposed east-west connector which will bisect Willow Creek and materially reduce its attractiveness and developability while providing little if any benefits to the development itself. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: Comment noted. No response necessary.

#### I-14

Comment: By applying the methodology and assumptions used in the DEIR's transportation analysis, it is clear that the Draft 1984 SNCP would increase peak hour traffic arriving from the 9.6-acre Westersund parcel. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Mr. and Mrs. Frank Westersund)

Response: Comment noted, no response necessary.



Comment: Reduction of commercial development on the Westersund parcel would result in the project being suitable for only a single rather than two "anchor" tenants. Therefore, a shopping center at that location would be less attractive to shopping center developers because it would be less desirable and useful for nearby residents, including residents of the northwestern portion of the North Sacramento community. At least some of these shoppers would, therefore, be expected to travel through the highly congested intersection of Northgate Boulevard and West El Camino Avenue to reach Northgate Shopping Center. Therefore, the Blayney Proposal would cause this additional increase in transportation problems in South Natomas. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Mr. and Mrs. Frank Westersund)

Response: Comment noted. No response necessary.

#### Section J: Air Quality

##### J-1

Comment: The air quality analysis in the DEIR does not fully identify the regional impacts on future ozone levels under alternative development plans. An alternative estimate of emissions as generated by the URBEMIS#1 computer program is presented in the comment letter. (California Air Resources Board)

Response: The estimates of smog precursor emissions presented in the DEIR were derived from the VMT estimates produced by the CH2M Hill traffic modeling studies. The traffic modeling data were extrapolated from morning and afternoon peak hours to a daily basis assuming that 80 percent of daily VMT occurred during off-peak periods. Year 2000 emission rates were derived from EMFAC6D (80° F) assuming 50 percent cold start VMT for the morning peak hour, 43 percent cold start VMT for the afternoon peak hour, and 35 percent cold start VMT for off-peak hours. For reactive organic compounds, the emission rates used in the DEIR do not appear to differ significantly from those used in URBEMIS#1. For oxides of nitrogen, the DEIR appears to use substantially higher emission rates than does URBEMIS#1.

The major difference between smog precursor emission estimates in the DEIR and the URBEMIS#1 output involves differences in total area-wide trip generation (and perhaps some difference in mean trip length). URBEMIS trip totals seem to be about 30-35 percent greater than the trip totals produced by the CH2M Hill traffic model. Two factors appear to be responsible for the lower total trip generation from the CH2M Hill model: accounting for TSM measures according to City policies and

ordinances; and accounting for internal trips between different land uses within the South Natomas area. It appears that, when applied to a large area of mixed land uses, the URBEMIS model "double counts" trips between different land uses within the area analyzed (i.e., between residential and office, commercial, or industrial areas; between residential and shopping center areas, etc.).

The URBEMIS estimates of daily trips are 363,169 for the 1978 SNCP and 433,557 for the 1984 Draft Community Plan. Daily trip estimates from data used for the DEIR are 269,875 for the 1978 SNCP and 324,180 for the 1984 Draft Community Plan. Both the DEIR and the URBEMIS#1 estimates indicate essentially the same percent change in emissions between the 1978 SNCP and the Draft Community Plan.

#### J-2

Comment: The 1982 SIP projected that 1987 reactive hydrocarbon emissions would exceed the level allowing attainment of the federal ozone standards by 22.15 tons per day. The proposed plan amendment and individual project applications would further aggravate this situation (by 0.78 - 1.36 tons per day) unless vehicular trip generation is reduced through mitigation measures. (California Air Resources Board)

Response: Comment noted. These considerations are discussed in Section J, Air Quality, of the DEIR.

#### J-3

Comment: It is unclear how the revision of the South Natomas Community Plan fits into the overall plan for the City's growth. The changes proposed are not consistent with the existing air quality plan. (Environmental Council of Sacramento)

Response: Comment noted. The inconsistency with the Air Quality Plan is recognized in the DEIR.

#### J-4

Comment: The DEIR fails to identify air quality mitigation measures that would allow attainment and maintenance of air quality standards. (Environmental Council of Sacramento)

Response: The DEIR categorizes air quality impacts of the Draft Community Plan as significant unavoidable adverse impacts which cannot be mitigated to less than significant levels.

The traffic projections used as the basis for the air quality analysis have already incorporated significant trip reduction through improved transit, ride sharing, and other measures. The DEIR notes that no practical highway improvement measures have been found to solve the predicted traffic congestion and carbon monoxide problems at the West El Camino/I-5 interchange. Through lanes and grade separation improvements were identified as measures which might solve congestion and carbon monoxide problems at the Garden Highway/Northgate Boulevard intersection, although City staff do not support such measures because of their excessive cost.

The regional air quality plan was unable to develop measures that would solve existing ozone problems under the growth patterns indicated by current land use plans; the proposed South Natomas Community Plan would further aggravate this situation. The "contingency measures" identified in the Air Quality Plan would help reduce air pollution levels, but are unlikely to solve predicted air quality problems.

J-5

Comment: There are numerous mitigation measures which ought to be included in the Community Plan and the project EIRs. Please note that the 1982 Air Quality Plan requires a 30 percent reduction in all trips, while the City's trip reduction ordinance is aimed at a 15 percent reduction in work trips; compliance with the trip reduction ordinance alone is not adequate. Mitigation measures beyond the 1982 Air Quality Plan must be included in the Community Plan and project EIRs. (Environmental Council of Sacramento)

Response: In adopting the 1982 Air Quality Plan, the City identified several "contingency measures" to be considered in solving new or continuing air quality problems. Those most applicable to the Draft Community Plan involve: requiring developers to help fund transit system improvement and expansion; and requiring developers to help fund the development and marketing of regional ridesharing programs. As noted in comments concerning the Transportation section of the DEIR, Regional Transit is working on a cost estimating procedure that could be incorporated into a transit system funding ordinance. Regional Transit has also suggested that developers be required to assist local agencies in meeting the "local match" portion of Light Rail system development costs.

Avoidance of potential carbon monoxide problems at the West El Camino/I-5 interchange would require a 24.4 percent reduction in emissions. Avoidance of potential carbon monoxide problems at the Garden Highway/Northgate Boulevard intersection would require a 13.3 percent reduction in emissions. The 1982 Air Quality Plan indicates that a 30.2 percent reduction in 1987 reactive organic compound emissions is needed to achieve federal

ozone standards. It is questionable whether the transit and ridesharing funding measures noted above could produce these emission reductions. Further discussion of air quality mitigation measures is presented in response to Comment J-8.

While the 1982 Air Quality Plan addresses the need to reduce all vehicle trips (not just work-related trips), that document does not "require" or assume a 30 percent reduction in trips. The plan states:

"This plan does not contain locally adopted or supported programs that are strong enough to reduce pollution levels to the federal standard for ozone by 1987. This plan does not, for that reason, meet the requirements of the Federal Clean Air Act.

"This plan does, however, meet the federal Environmental Protection Agency's guidelines requiring that all reasonably available transportation measures be adopted and that the best available control technology be applied to stationary and area sources of pollution....

"The continued violations of the ozone standard are a frustrating and perhaps insolvable problem. It may not be possible, with current technology, to have clean air and a million people in the Central Valley. At the core of this issue is the automobile and the manner in which people have used it historically. The Cities and Counties have committed to ambitious and aggressive programs to reduce the use of the car through such programs as parking management, ridesharing, transit, and bicycle systems. The City and County of Sacramento have set as a goal a 30 percent reduction in the use of cars by 1987. There is no evidence, however, to indicate that the programs that have been adopted will cause that kind of reduction.

"Typically, a very aggressive auto use reduction program might cause as much as a 10 percent reduction. This 10 percent estimate has been used as the basis for the conclusion that the plan will not cause the ozone standard to be attained." (Sacramento Air Quality Plan, pages I-3 and I-4).

#### J-6

Comment: The EIR presents an inadequate discussion of environmental impacts by failing to estimate the health, crop, and property impacts of the violation of the ozone and carbon monoxide standards. We have shown elsewhere that urbanization levels indicated in the SNCP July 1984 Draft and the SWA Alternative 1 for North Natomas would result in a 740 percent increase in current carbon monoxide levels and a 834 percent increase in hydrocarbon emissions. At this level of urbanization, Sacramento would experience 150-200 unhealthy days per year, with over 150 days of ozone violations. The EIR should examine these issues and the issue of air pollution-related health care costs. (Environmental Council of Sacramento)

Response: The estimates of emission increases for North and South Natomas are based on use of the URBEMIS#1 model, which will significantly overestimate expected vehicle emissions (see response to Comment J-1).

The DEIR predicts some future localized carbon monoxide problems in South Natomas. The frequency of such problems, however, cannot be estimated from the percentage increase in combined North/South Natomas carbon monoxide emissions. There are no monitoring stations in North or South Natomas to indicate whether existing emissions in these areas are producing any violations of the federal and state standards; modeling studies suggest there are no current problems. Furthermore, localized carbon monoxide problem locations are affected almost entirely by carbon monoxide emissions occurring within about 0.5 mile of the problem area. Total area-wide emission increases are consequently of limited value in evaluating the potential for future carbon monoxide problems.

While carbon monoxide is a highly localized pollution problem, ozone is very much a regional problem. The percent change in regional emissions does provide a rough index of the likely change in future regional ozone conditions. The referenced 834 percent increase in hydrocarbon emissions for the North and South Natomas areas must, however, be put in a regional context. This percent increase value is based on an emission estimate (produced by the URBEMIS#1 model) of 7.6 tons per day. This represents an increase of about 9 percent in regional emissions. Consequently, future ozone conditions should not be expected to show much change from recent levels.

The following material supplements the discussion of localized carbon monoxide problems on page J-4 of the DEIR:

Effects of Carbon Monoxide Exposure. Carbon monoxide affects both the cardiovascular system (the heart and blood vessels) and the central nervous system. The various recognized medical effects occur because carbon monoxide combines readily with hemoglobin, reducing the amount of oxygen that can be transported in the bloodstream. In addition, carbon monoxide reduces the rate at which oxygen is released from the bloodstream to body tissues. An adequate oxygen supply is essential to proper functioning of body tissues and physiological processes. The nervous system, circulatory system, and musculature system are especially sensitive to reduced oxygen supplies. Proper development of a fetus also requires adequate oxygen supplies from the mother's bloodstream. In general, the young, the elderly, and persons with respiratory, circulatory, or cardiac problems are considered especially sensitive to high carbon monoxide levels.

Carbon monoxide combines with hemoglobin in the blood to form carboxyhemoglobin (COHb). Normal metabolic processes produce some carbon monoxide, resulting in normal blood COHb

levels accounting for 0.3-0.7 percent of the blood's hemoglobin. Physiological effects on the cardiovascular system and central nervous system have been identified in laboratory studies when COHb levels reach 2.5-4 percent. Some recent studies have suggested that COHb levels of 2 percent can trigger angina (chest pressure and pain due to inadequate oxygen supply to the heart muscle) in some people. Other researchers question the validity of the studies that suggest a 2 percent COHb threshold for triggering angina; most studies show a threshold of about 3 percent. Reduced vigilance and time interval discrimination have been reported for COHb levels of 4-6 percent.

The relationship between carbon monoxide levels in the air and resulting COHb levels in the blood is rather complex. Blood volume, hemoglobin content of the blood, breathing rate, and the rate of metabolic carbon monoxide production vary among individuals. All of these factors affect the COHb level reached after a given ambient carbon monoxide exposure. The California Air Resources Board (1982) has estimated that an 8-hour exposure to varying carbon monoxide levels which average 9 ppm (parts per million) will produce COHb levels of 1.3-1.8 percent in people with "normal" physiological functions, and 1.9-2.4 percent in persons with sensitive physiological conditions. For 8-hour exposures to varying carbon monoxide levels averaging 12 ppm, the ARB study estimated COHb levels of 1.7-2.3 percent for persons with normal physiological functions and 2.4-3.2 percent for persons with sensitive physiological conditions.

Residents and employees located in the immediate vicinity of the West El Camino/I-5 interchange and the Garden Highway/Northgate Boulevard intersection would be occasionally exposed to carbon monoxide levels that lead to detectable physiological changes. The most likely physical symptom of this exposure would be decreased tolerance for physical activity. A few sensitive individuals might have an increase in the occurrence of angina. Vehicle occupants traveling through the localized carbon monoxide hot spots would be briefly exposed to high carbon monoxide levels, adding to their cumulative daily exposure.

The following material supplements the discussion of regional smog problems on pages J-4 and J-5 of the DEIR:

Health Effects of Ozone Exposure. Photochemical smog is an extremely complex mixture of chemical compounds, many of which have the potential for producing health effects. Air quality standards have been set for ozone, which is a major component of photochemical smog. Threshold levels for predicting human health effects from ozone exposure are far less clear than those for carbon monoxide. The most common physical symptoms of exposure to high levels of photochemical smog involve eye irritation and respiratory irritation. Eye irritation is usually caused by a variety of organic compounds found in photochemical smog (especially aldehydes and complex organic

nitrates). Respiratory irritation is usually due to ozone, although other compounds may also affect some people (perhaps through allergic reactions).

Clinical studies and laboratory experiments to determine the effects of ozone have often involved exposure to ozone concentrations far higher than the levels encountered in even the worst smog episodes in the Los Angeles basin. These studies are further complicated by conflicting results on the issue of whether repeated or prolonged exposure to ozone leads to increased tolerance to further exposures (and whether the mechanisms for any such tolerance create other physiological problems).

Attempts to correlate medical statistics with ozone monitoring data have produced mixed results. Mortality statistics generally show a stronger correlation with temperature than with ozone levels. Reports of respiratory and/or eye irritation symptoms usually show a correlation with ozone levels (although, as noted above, eye irritation is produced by smog components other than ozone).

Ozone levels expected to occur in the Sacramento region are most likely to produce reduced respiratory functions, with slight respiratory irritation in some people. Eye irritation from other smog components may be the most frequent health effect of future smog conditions in the Sacramento region.

Vegetation Damage From Ozone Exposure. Photochemical smog contains several compounds that have the potential for damaging crops or other vegetation. Ozone, ethylene, peroxyacyl nitrates, and nitrogen dioxide are the major smog components responsible for vegetation damage. Ozone and peroxyacyl nitrates are most frequently involved in reports of smog damage to vegetation. Air pollution damage to vegetation is usually diagnosed on the basis of a pattern of visible injury to plant tissues. Growth and yield reduction can, however, occur without any visible injury pattern being evident.

Considerable effort has been devoted to identifying pollutant exposures that correlate with various thresholds of visible injury. Precise injury thresholds are difficult to establish because of the range of other factors which influence the extent to which ambient pollution levels affect an individual plant. These factors include genetic variability within and between species; climatic factors such as temperature, humidity, and light intensity; seasonal and daily variations in physiological conditions of the plant; soil factors such as moisture and nutrient availability; the presence of other air pollutants; and the presence of physiological stress caused by pathogens, parasites, or other factors. In general, plants are more sensitive to air pollutants when internal metabolic processes are active.

Ozone damage to vegetation is usually the result of persistent exposure to moderate ozone levels. Brief exposure to high ozone levels can cause significant damage if the exposure occurs at a sensitive stage of the plant's growth cycle. The following ozone exposure conditions represent general thresholds for visible injury to sensitive plants growing under favorable conditions: 0.10-0.25 ppm for 1 hour; 0.07-0.10 ppm for 2 hours; 0.04-0.10 ppm for 4 hours; and 0.03-0.07 ppm for 8 hours. Current ozone levels in the Sacramento Valley have the potential for producing injury to sensitive crops and other vegetation. Many common crops (alfalfa, beans, clover, oats, safflower, soybeans, and tomatoes) contain varieties that exhibit a wide range of sensitivity to ozone damage.

Other Effects of Ozone Exposure. There are few data available on which to estimate the potential for ozone damage to materials. Ozone is chemically a rather strong oxidizing agent. Accelerated deterioration of certain dyes, fabrics, natural rubber, and other materials probably occurs, but the extent of such effects is uncertain. Attempts to estimate the indirect economic costs of photochemical smog impacts are largely exercises in speculation, despite the effort that is often involved in such studies.

#### J-7

Comment: The DEIR notes that air quality violations will occur after existing mitigation measures from the 1982 Air Quality Plan are implemented. The DEIR does not, however, address the numbers of people who will be exposed to an increasing number of air quality episodes, or the health and indirect economic impacts of continued air quality deterioration. (Sacramento County Air Pollution Control District)

Response: The modeling procedures used do not provide a firm basis for predicting the geographic extent or the numbers of people likely to be exposed to localized carbon monoxide problems. In general, locations within about 200 feet of the affected major arterials, and within about 1,500 feet of I-5 along West El Camino Avenue, appear to have a potential for experiencing localized carbon monoxide problems. The frequency of carbon monoxide episodes would probably be comparable to the frequency of such episodes noted at other high traffic volume locations in the Sacramento area (4-6 occurrences per year).

Most of the Sacramento metropolitan area would experience continuing violations of the federal and state ozone standards. As noted in the DEIR, ozone levels are expected to decline somewhat in the near future, then increase somewhat after 1990. No projections have been made of the magnitude or frequency of future ozone levels after build-out of South Natomas, but the



patterns experienced in the early 1980s are probably representative.

Potential health effects of projected pollution levels are discussed in response to comment J-6. No attempt has been made to estimate indirect economic impacts of air pollution and such a study is beyond the scope of this EIR.

J-8

Comment: Preparers of the DEIR conclude that available air quality mitigation measures are insufficient to reduce potential air quality impacts to less than a significant level. Staff disagrees with this conclusion. It is our view that currently available mitigation measures could be made more effective through appropriate public policy decisions. Examples of these policy actions are:

- o Introduce legislation to change the current Motor Vehicle Inspection Program from a biennial to an annual program.
- o Introduce legislation to make the pass/fail emission levels in the vehicle inspection program more stringent.
- o Amend the current City/County trip reduction ordinances to remove voluntary provisions and accelerate compliance schedules.
- o Accelerate implementation of public education programs to promote alternatives to the solo-auto commute trip.
- o Form a public/private working group for the purpose of developing public support for a dedicated transit tax.
- o Work with the Regional Transit District to develop and implement a regional land use ordinance to assure consideration and funding for future transit needs.
- o Develop and implement a public policy that would require all employers to charge a mandatory employee parking fee. Such fee revenues would be dedicated to the regional transit district. This kind of policy should be a clear disincentive to the solo-auto commute trip. (Sacramento County Air Pollution Control District)

Response: City support for legislation modifying the vehicle inspection and maintenance program would not guarantee that such changes would be enacted. While local agency support would undoubtedly be necessary to pass changes in the vehicle inspection program, local support for state legislation would not directly reduce emissions anywhere in South Natomas. The City's trip reduction ordinance requires all "major projects"

(those having 200 or more full-time employees) to prepare and implement an approved Transportation Management Plan. The City's ordinance would be more effective if all provisions also were applied to "minor projects" (those with 50-199 full-time employees) and if the target trip reduction goal were increased from the current 15 percent. Forming a group to promote public support for a dedicated transit tax, while perhaps necessary to generate support for such a tax, will not directly reduce emissions. The last two items noted in the comment are consistent with the "contingency" measures contained in the Air Quality Plan.

Carbon monoxide emissions in the West El Camino/I-5 interchange vicinity would have to be reduced about 25 percent to avoid air quality problems. Carbon monoxide emissions in the Garden Highway/Northgate Boulevard vicinity would have to be reduced almost 15 percent. Regional emissions of ozone precursors must be reduced by at least 20 percent more than provided by current programs. It is not clear whether implementation of the measures noted in the comment would provide the extent of emission reductions needed to attain federal and state air quality standards in the Sacramento region.

The following additional mitigation measures supplement the mitigation discussion in the DEIR.

Adoption of a new South Natomas Community Plan should include formal recognition of the need to amend the 1982 Air Quality Plan to provide more aggressive efforts to achieve and maintain air quality standards. The City should recognize that obtaining a 15 percent reduction in commute trips from major new employers will not achieve the 30 percent reduction in regional smog precursor emissions required to attain federal and state ozone standards. The City should also recognize that the 30 percent emission reduction requirement identified in the 1982 Air Quality Plan is over and above the emission reductions anticipated from current vehicle inspection, ridesharing, and transit programs. In particular, the City should consider such actions as:

- o Actively working with other local governments to change current vehicle inspection and maintenance programs to an annual basis, and to increase the stringency of such programs.
- o Amend the current trip reduction ordinance to require that "minor projects" also develop and implement transportation reduction plans.
- o Accelerate implementation of public education programs to promote transit and ridesharing.

- o Aggressively pursue development of local ordinances and other measures to secure funding for expanded transit and ridesharing programs.

## Section K

### K-1

Comment: The EIR should indicate responsibilities and procedures for implementing the identified noise mitigation measures. (California Department of Health Services, Environmental Health Division)

Response: Noise mitigation measures will be implemented on a project-by-project basis when specific development proposals come before the City for approval. At such time, specific measures applicable to a given project can be imposed as requirements of special use permits or other City approvals.

The following additional mitigation measure supplements the mitigation discussion in the DEIR:

### Noise Policy Statement For The South Natomas Community Plan

Adoption of a new South Natomas Community Plan should include a specific noise policy statement such as the following: Residential, health care, educational, and cultural developments or facilities proposed for areas which are or will be exposed to outdoor noise levels above 60 dB (Ldn) shall utilize appropriate design measures and building materials to ensure that interior noise levels due to such outdoor noise sources are reduced to less than 45 dB (Ldn).

### K-2

Comment: The EIR should note the aesthetic impact of noise barriers. The EIR should recognize the design consequences and potential impacts (energy use, lifestyle, indoor air quality, cost, etc.) of having residential development in areas requiring noise mitigation. (Robert B. McCray, Weissburg and Aronson, Inc., on behalf of Capitol/80 Properties)

Response: Comments noted. The DEIR recognizes aesthetics, cost, and site design as important considerations in determining the desirability of noise barriers. The noise mitigation measures identified for residential construction will normally increase construction costs and increase the potential for build-up of internally-generated air pollutants; these measures will also reduce heating and air conditioning costs of building operation while increasing property values.

K-3

Comment: The EIR does not identify the I-80 traffic volumes used to prepare Exhibit K-6. (Robert B. McCray, Weissburg and Aronson, Inc., on behalf of Capitol/80 Properties)

Response: Traffic volumes used to produce the noise contour map (Exhibit K-6 in the DEIR) were based on the afternoon peak hour traffic volumes projected by CH2M Hill (including through traffic estimates). As indicated in Appendix III of the DEIR, analyses were performed for different segments of major roadways, with peak hour volumes factored into a 24-hour pattern. Specific ADT values used for I-80 ranged from 46,188 at the Sacramento River to 88,635 at Northgate Boulevard. Noise contours in the vicinity of the Capitol/80 Properties site are based on I-80 traffic volumes averaging 5,466 vph (vehicles per hour) at 50 mph during daytime periods, 3,250 vph at 55 mph during evening hours, and 1,477 vph at 55 mph during nighttime hours.

K-4

Comment: The EIR should analyze noise impacts on residential development if the east-west connector is extended from Capitol Business Park through the Willow Creek site. (Karen O. Ahern, Diepenbrock, Wulff, Plant, & Hannegan for Willow Creek Associates)

Response: Noise analyses presented in the DEIR are based on traffic modeling results that incorporated the roadway network shown in the Draft Community Plan (Exhibit B-6), rather than the original roadway network assumptions reflected in Exhibit I-12. Traffic on the revised configuration of Gateway Oaks Drive north of West El Camino Avenue was incorporated into the analysis used to generate the noise contours on Exhibit K-6. Projected volumes on the proposed connector between Gateway Oaks and Orchard (south of West El Camino Avenue) were too low to affect the noise contour pattern shown in Exhibit K-6.

Section L: Energy

L-1

Comment: Page L-1, Paragraph 3 contains an error. A substation site measuring 100 feet x 150 feet would be adequate for installation of two, 20 kV transformers (69 kV to 12 kV) with related equipment. (Sacramento Municipal Utility District)

Response: Comment noted. The above information is hereby incorporated into the EIR.

L-2

Comment: When a substation is required, it should be noted that overhead 69 kV lines will also be required into and out of the substations. Exhibits L-2 and L-5 have been corrected to show the latest substation locations and transmission line corridors. (Sacramento Municipal Utility District)

Response: Comment noted. See the errata to Volume 1, pages L-2 and L-5 of the DEIR.

L-3

Comment: On page L-6 the DEIR states that the 13 applications would increase electricity demand, which in turn would constitute a significant impact during peak load periods. The DEIR also states that development proposed by the 13 applications would occur elsewhere in the region if not approved for South Natomas. Thus, whether the development occurs in South Natomas or elsewhere in the region the same impact would result (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of project applicants)

Response: Comment noted. Electricity demand resulting from the 13 applications would constitute a significant impact on SMUD's system during peak load periods whether the projects are constructed in South Natomas or elsewhere in SMUD's service area. The fact that the impact could occur in other areas does not make the impact less than significant.

Section M: Geology and Soils

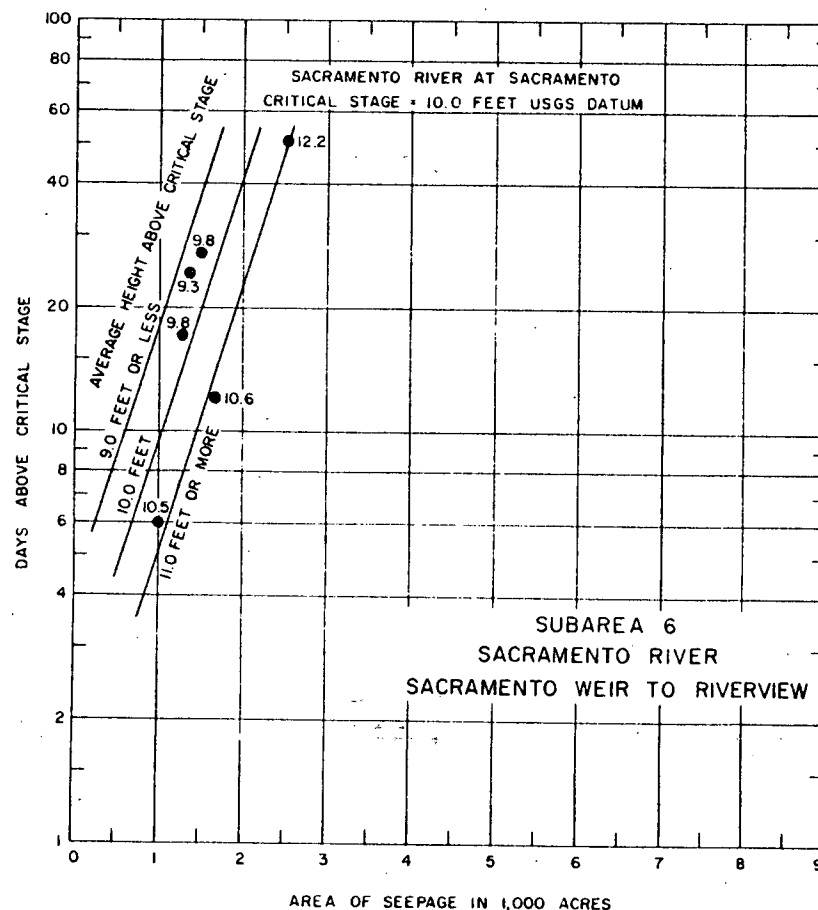
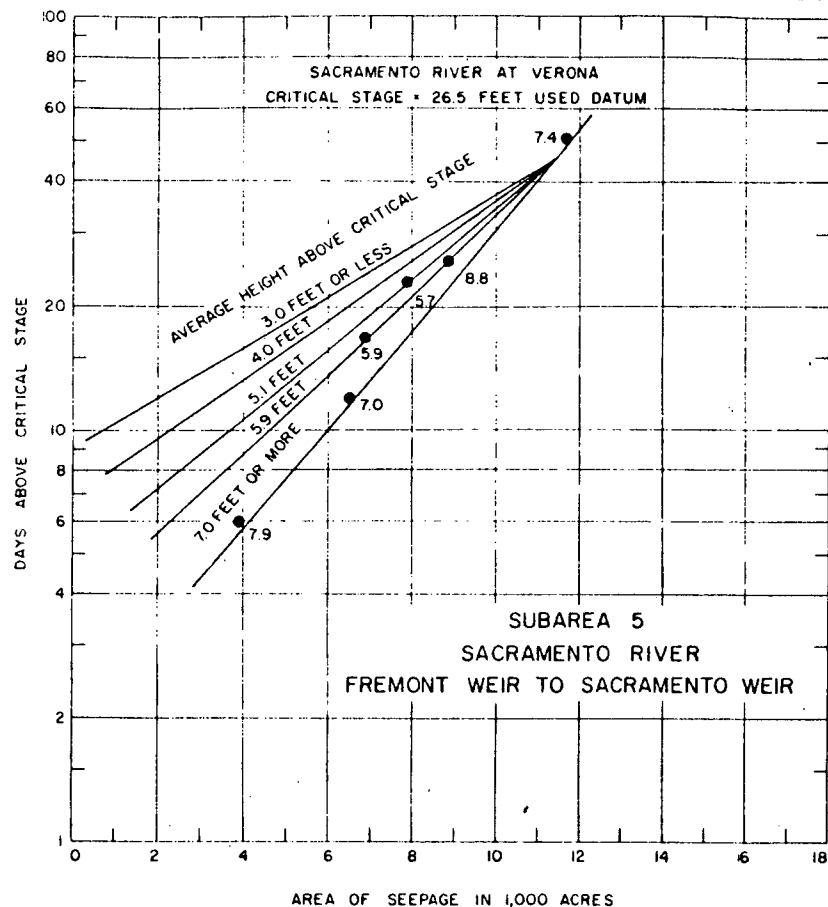
(No comments received.)

Section N: Hydrology, Drainage, and Water Quality

N-1

Comment: Section N, Hydrology, Drainage, and Water Quality, should be expanded to include the seepage evaluation curves found on Plate 30 of Department of Water Resources Bulletin 125. To present the seepage data, Exhibit N-2 probably should have been superimposed on Exhibit B-6 in Volume I and Exhibit 1 in Volume II. (California Department of Water Resources)

Response: The seepage evaluation curves are presented in the attached exhibit. These curves illustrate the geographic extent of seepage expected under various river flow conditions. Subarea 5 includes most of South Natomas west of I-5, while



## NOTE:

- (1) These correlation curves represent the seepage area which would result from each individual seepage occurrence.
- (2) If the river drops below critical stage for 5 consecutive days or less, the period, including the 5 days, is considered to be a single occurrence of seepage.
- (3) The average height above critical stage is determined for each seepage occurrence by summing the daily gage heights above and below critical stage, divided by the number of days in the seepage occurrence.

STATE OF CALIFORNIA  
THE RESOURCES AGENCY  
DEPARTMENT OF WATER RESOURCES  
SACRAMENTO DISTRICT  
SACRAMENTO VALLEY SEEPAGE INVESTIGATION  
SEEPAGE EVALUATION CURVES  
1966

subarea 6 includes a portion of South Natomas along the American River.

The seepage area map (Exhibit N-2) was not superimposed on the Draft Community Plan (Exhibit B-6) or the application location map (Exhibit 1) because of the large number of shading patterns already on Exhibit B-6. It was felt that there were sufficient common landmarks to allow easy comparison of the exhibits.

## Section O: Biology

### O-1

Comments: The Department of Fish and Game recommends that the mitigation measures proposed on pages O-11 and O-12 become part of any development projects within the planning area. These include the use of native vegetation landscaping in nonresidential areas, reduction of habitat disturbances along Bannon Slough and the Natomas Main Drainage Canal, and permitting young oaks to mature in those areas dedicated as oak woodland. The nondeveloped zone along each side of the slough and canal should be increased to 100 feet to permit the establishment of herbaceous vegetation. (Department of Fish and Game)

Responses: Comment noted. No response necessary.

### O-2

Comment: Maximum natural area preservation is needed to provide adequate habitat for wildlife to remain in the City. (Environmental Council of Sacramento)

Response: The DEIR recommended several measures to ensure that adequate habitat for wildlife remains in the South Natomas area (see mitigation measures on pages O-11 and O-12).

### O-3

Comments: Commentor supports the dedication of Bannon Slough to the City of Sacramento for the protection of the habitat. (Ray Tretheway)

Responses: Comment noted. No response necessary.

## Section P: Aesthetics

(No comments received.)

## Section Q: Cultural Resources

Q-1

### Comment:

- a) Since the southwest corner of the project is within a sensitive area (Ca-Sac-164), the Native American Heritage Commission recommends that a cultural resource survey be conducted in this area prior to development.
- b) We would also recommend that a Native American be present as an observer through all phases of the survey, and if Native American artifacts or remains are located in this area, that a Native American observer be present during the grading phase of this project. If requested, the Commission will provide you with a list of appropriate Native Americans.
- c) Should Native American remains be encountered, we would request that the County Coroner's Office be contacted pursuant to Section 7050.5 of the Health and Safety Code. (California Native American Heritage Commission)

### Response:

- a) Comment noted. The DEIR recommends that a cultural resource survey be conducted in this area prior to development in Volume 1, Section Q, Cultural Resources, pages Q-1 and Q-3.
- b) The DEIR recommends (Volume 1, Section Q, Cultural Resources, page Q-3) that a qualified archeologist examine any artifacts found during construction. A qualified archeologist would be able to identify Native American artifacts or remains. Upon identification of such artifacts, the Native American Heritage Commission should be contacted.
- c) Comment noted. No response necessary.

## Section R: Fiscal Assessment

R-1

Comment: Keyser Marston Associates' assumed amounts of development (square feet and dwelling units) for land uses in each alternative are different (generally lower) than the amounts shown elsewhere in the EIR, e.g., page S-7, and B-8.



To illustrate, the following differences are noted for the 13 Applications Alternatives:

	<u>Exhibit R-21</u> <u>Keyser Marston</u>	<u>Section S, Exhibit S-7</u> <u>Cumulative Impacts</u>
Nonresidential square feet		
Commercial	1,547,000	1,785,030
Office	6,100,000	6,248,391
MRD	4,058,000	4,100,700
Industrial	--	726,500
Medical	--	616,186
Marina	--	30,800
Total: Nonresidential	11,705,000	13,507,607
Residential Dwelling Units	10,222	18,744

The difference of 1,802,607 sf in nonresidential could make a difference of \$324,469 in property tax revenues alone (1,802,607 x \$60/sf x 1 percent x City's 30 percent). (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan on behalf of Willow Creek project applicant)

Response: There are several reasons for the discrepancies between the development figures: 1) the analysis was focused on those portions of development which were "incremental," that is, those land uses which were not a part of the existing SNCP and were therefore new, as proposed in the 13 applications. This approach is a sound one, given that the existing SNCP was already approved and thus its fiscal impact was not in question in this analysis; 2) the fiscal analysis focused on only that portion of the incremental square footage which was found to be marketable, according to our report of March 1984; and 3) minor changes in the development alternatives occurred between the writing of the market report and the fiscal report which were not considered large enough to impact the fiscal analysis and, had they been included, would have made the market analysis inconsistent.

The difference in commercial square footage is approximately that of two parcels, noted in Exhibit S-7, footnote 1, the disposition of which was not determined as of the writing of the market analysis. For the office uses, the difference is based on market absorption. For MRD, the difference (of 42,700 sf) resulted from minor changes in the development scenario. For industrial uses, 591,500 sf had been allowed under the existing SNCP increasing to 632,000 with the 13 applications (not 726,500, as cited in Exhibit A); that incremental increase of 40,500 sf was not deemed large

enough to substantially impact the fiscal outcome of the project, and was thus not included.

The bulk of the medical facilities proposed in the 13 applications consisted of a hospital and a convalescent facility. Until it is known whether these facilities will be owned by religious affiliates, and therefore off the tax rolls, and because of the beneficial nature of such uses, irrespective of cost, they were excluded from the analysis. The marina facilities were not included in the analysis because they were allowable under the existing SNCP.

Finally, the residential unit estimate of 18,744 units (as cited in Exhibit A) is a cumulative total for new residential units already allowed by the SNCP, which would still be allowed under the 13 Applications Alternative. The figure used in the fiscal impact analysis (10,222) consists of the allowable number of units (18,744), less the existing number of units in the area (6,926) and units of in-fill housing east of Northgate Boulevard (1,596) which were excluded due to uncertainty over what type of in-fill units will be developed and when.

#### R-2

Comment: The cost/revenue analysis uses a total residential population of 25,044 for the 13 Applications Alternative, while the EIR assumes a resident population of 46,860 for the same alternative. The residential population factor used for the cost and revenue analysis by Keyser Marston is 2.45 persons per dwelling unit applied to 10,222 dwelling units for the 13 Applications Alternative. However, in the EIR, Section S (page S-13) a factor of 2.5 per dwelling units is applied to 18,744 dwelling units. Why is there a difference, particularly in total resident population? (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: The residential population factor used by Keyser Marston Associates in the fiscal analysis was carried over from the earlier market study, wherein it was determined, based on current trends in the area, that the average household size was 2.45 persons. The fiscal analysis was conducted to be consistent with the market analysis, thus the figure was carried forward.

The difference of .05 person per household contributes somewhat to the difference in total population figures, but the primary difference lies in the fact that the fiscal analysis was an incremental analysis, not a cumulative analysis; thus the total population figure of 25,044 persons was calculated only on the new development proposed in the 13 applications, rather than on the total development which will result by superimposing the 13 applications on the existing

1978 SNCP developments (both existing and potentially available under the SNCP).

R-3

Comment: Fire protection operating costs include an estimated \$634,000 for relocation and expansion of an engine company for reasonable response time for development in South Natomas. In addition, there would be another \$634,000 for the City to replace County personnel in County Company No. 17 when North Natomas is annexed. What is the rationale for including North Natomas costs in the South Natomas analysis? Excluding the North Natomas fire station cost of \$634,000 would substantially affect the net fiscal impact, particularly under the 13 Applications Alternative. While there may be a rationale for including some of the North Natomas fire station cost, there appears to be no rationale for including all of these costs. (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: The rationale for including the cost of Company No. 17 in the South Natomas analysis is that the development plans for South Natomas will necessitate acquisition of the station before development in North Natomas is underway. We agree that not all of that cost should be apportioned to South Natomas, but we had no rationale for splitting the costs between South and North Natomas at this time. Thus, the entire cost of staffing Company No. 17 was included in this analysis, with accompanying footnotes stating that this was an identifiable overestimate.

R-4

Comment: For property tax revenue estimates (page R-13) Keyser Marston Associates indicates that the City receives 30-35 percent of the total tax receipts in newly developed property, and assumes 30 percent for revenue projections. Why is the low end of the range used? If the midpoint in the range (32.5 percent) is used, the additional 2.5 percent share would mean \$303,550 more in property tax revenues for the 13 Applications Alternative at build-out. (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: The lower end of the range of potential property tax receipts to the City of Sacramento was used to be conservative and in recognition that the share which the City receives will increase or decline based on its share of total property tax receipts in Sacramento County. In a year where substantial development takes place elsewhere in the County, the City's share of receipts could very well not reach 35 percent. It is unlikely, however, that its share would drop much below 30 percent.

R-5

Comment: What is the basis for the estimated development values per unit on page R-14 which are used to project assessed value for property tax revenues? The assumption of \$50,000/unit of residential appears low. For example, the average building permit valuation for all 10 counties in the Sacramento Valley was \$57,671 in February 1984, which is 15.3 percent higher than the amount assumed by Keyser Marston. This difference alone would add \$78,412,962 in assessed value for the 13 Applications Alternative, which would mean an increase in City property tax revenues of \$235,239 (assuming the City's share is 30 percent of total revenue). (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: The average residential building permit value (for both single-family and multifamily units) in Sacramento County for the months of January-September of 1984 was \$50,177, according to Security Pacific Bank's publication "California Construction Trends." That figure was rounded down to \$50,000. The average building permit value in the nine surrounding counties is not relevant to this analysis.

R-6

Comment: Sales tax revenues are projected only from retail commercial land uses. Why are no sales tax revenues projected from office or industrial uses? A number of studies have shown that taxable sales occur from these types of land uses as well, since site of sale can often be in an office or at the manufacturing site. (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: No sales tax revenues were projected from office uses or industrial uses because such estimates are premature without knowledge of specific tenants in a development. We have no basis for assuming tenant types, especially down to the level of whether or not they will have an office-related sales office at this time. For that reason, a "point of origin" approach was taken, using only those known commercial tenant types which may be included in the project.

R-7

Comment: For the 13 Applications Alternative, the revenues shown in the Exhibit R-21 summary are different (higher) than the revenues shown in the detail in Appendix Table B-8 (page VI-17 of Appendix VI). The narrative discussion is consistent with Exhibit R-21. Why are the revenue totals in the detail different than the revenue totals of the summary for the 13 Applications Alternative? (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: The revenue totals in the detail are different from those shown in the summary because an unrevised set of Appendix tables made their way into the report. The corrected Table B-8 is included in the errata.

R-8

Comment: In forecasting miscellaneous revenues, it should be noted that the amount for Intergovernmental Revenues is extremely understated relative to the amount that would likely be received when development actually occurs. This is because the 1983-84 fiscal year is used for base data and in that year, state revenue subventions were significantly reduced, particularly Vehicle License Fee revenue. In 1984-85, the State Legislature restored full funding, and as a result the amount of intergovernmental revenue increased from \$4.3 million in 1983-84 to \$12.1 million in 1984-85. This would essentially triple the per capita revenue factor used by Keyser Marston, increasing the factor from \$14 per unit to approximately \$40 per unit. This would mean approximately \$651,144 more miscellaneous revenue for the 13 Applications Alternative than was forecast by Keyser Marston. The City would actually receive this additional amount from development, based on the current intergovernmental funding level. (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: There is no recognized methodology to predict how intergovernmental transfers will affect the cost/revenue balance of a project. The base year for this analysis was FY 83-84 and the analysis accurately reflects the revenue situation as of that time.

R-9

Comment: If alternative methodologies or assumptions are utilized for projecting revenues as suggested by the preceding, it is estimated that the analysis would show that approximately \$1,514,000 in additional revenue would be received by the City beyond what was projected by Keyser Marston for the 13 Applications Alternative. This additional revenue would be over and above the net revenue surplus of \$233,000 forecast by Keyser Marston at build-out. This implies that by using the alternative (and in our judgment more realistic) revenue assumptions, the City could expect a continuing revenue surplus of approximately \$1,747,000 annually at build-out of the 13 Applications Alternative. To the extent that the cost estimates used by Keyser Marston are high, this revenue surplus would increase accordingly. (Karen O. Ahern; Diepenbrock, Wulff, Plant and Hannegan)

Response: Because many of the points cited by the commentor were erroneously based on the cumulative impact of adding development of the 13 applications to existing or allowable development under the SNCP, it is not possible to compare the figures mentioned in this point to the figures in the Keyser Marston analysis.

Section S: Cumulative Impacts:  
13 Applications Alternative

S-1

Comment: (Reference to page S-18, Indirect Impacts). The DEIR should justify the assumption that residential development which is "displaced" by South Natomas nonresidential development would be developed at an average density of 6.6 units per acre. In light of rising housing costs, it appears that higher density residential development is more likely to occur, especially if it is to meet the needs of new Sacramento residents and workers, many of whom may not be able to afford single-family dwellings (see Section G, Housing). (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Capitol/80 Properties)

Response: The commentor refers to a generation factor used to estimate the number of acres of land which would be needed to accommodate the number of units displaced in South Natomas. Since the majority of planned units were single-family, a density of 6.6 units was used. The commentor makes a valid point that if development occurs at a higher density, fewer acres would be needed to accommodate development. For example, in the section referenced above, if residential development were to occur at 12 units per acre the 4,248 displaced units could be absorbed by 354 acres of vacant land elsewhere.

S-2

Comment: (Reference to Section S, Cumulative Impacts): The DEIR should also address the beneficial effect which South Natomas development may have on the North Sacramento community. Specifically, as South Natomas reaches full build-out, North Sacramento may be increasingly attractive to residential developers. (See page G-5, second full paragraph). (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of Capitol/80 Properties)

Response: Section S, Cumulative Impacts, does address this issue (on Page S-20, 4th paragraph) as follows: "The employment-generating uses proposed by the 13 Applications Alternative would enhance the marketability of residentially

designated land in South Natomas, North Sacramento, and other communities because of their proximity to a major employment center."

Section T: Cumulative Impacts:  
Five North Natomas Applications  
Added to 13 Applications Alternative

(No comments received.)

Section U - Master (Quantitative) Summary Table  
for 11 Project Applications Plus 11  
Individual Summary Tables

U-1

Comment: In the Summary Tables in Section U, it is noted that conservation and load management programs are the mitigation from some of the developments. It cannot be implied that the conservation and load management will defer the need of a substation and associated overhead transmission lines that will be built to satisfy the increased electrical needs brought about by development. (Sacramento Municipal Utility District)

Response: Comment noted. No response necessary.

Section V - References and Personal Communications

(No comments received.)

Appendix - 1

Comment: (Reference to Appendix VII). The analysis prepared by Keyser Marston Associates of the effect of South Natomas applications on regional MRD development states that South Natomas would capture a "significant portion of the Sacramento region's high technology demand" (page VII-9). In light of this finding, the DEIR should address the adverse environmental consequences which will occur if this MRD development occurs elsewhere in the region rather than in South Natomas, prior to addressing the significance of the adverse environmental effects of such development in South Natomas. Otherwise, the relative adverse effects of South Natomas development and the actual significance of the decision which must be made on the projects are unclear. (Robert B. McCray; Weissburg and Aronson, Inc. on behalf of Capitol/80 Properties)

Response: It is beyond the scope of this report to identify the environmental consequences of MRD development in the entire Sacramento region. Furthermore, such an exercise would be highly speculative. Impacts aside from those related to community and site-specific impacts would be similar to those described in the DEIR.



## Section II

### VOLUME 2

#### Capitol Business Park (CBP) Section C: Summary of Findings

##### CBP C-1

Comment: We respectfully disagree with the finding in the DEIR that "conversion of agricultural land" is a significant adverse impact and one which cannot be mitigated. Even under a "no project" alternative, preservation of the remaining agricultural land within the South Natomas Community Plan area is no longer feasible in view of the urbanization of the area which has already occurred. More importantly, however, the decision that the South Natomas area should be urbanized was made many years ago, subsequent to consideration of environmental assessments at that time and the Draft 1984 Community Plan does not result in any such impact. (William G. Holliman, Jr.; McDonough, Holland & Allen on behalf of project applicant)

Response: See response to Volume 1, C-1 comment.

##### CBP C-2

Comment: We also disagree with the finding that six of the seven intersections described in the summary table, Exhibit C-5, will result in significant adverse impacts which cannot be mitigated to a less than significant level. (William G. Holliman, Jr.; McDonough, Holland & Allen)

Response: Comment noted. No response necessary. Specific points relating to traffic impacts are responded to under CBP I-1 through CBP I-5.

#### Capitol Business Park (CBP) Section H: Public Services and Facilities

##### CBP H-1

Comment: A community park is desirable on the Capitol Business Park site. A community park is compatible with office

and commercial land uses and would serve an area beyond the project site. (City Department of Parks and Community Services)

Response: Comment noted. No response necessary.

Capitol Business Park (CBP)  
Section I: Transportation

CBP I-1

Comment: There are both changes in the projects and mitigation measures which may be taken to substantially reduce the traffic impact of the projects as defined in the DEIR. In response to the DEIR and the traffic analysis, we intend to substantially reduce the densities of both projects as originally proposed and to submit revised plans and mitigation of the impacts set forth in the DEIR. We have attached hereto a report from Joseph R. Holland, consultant traffic engineer, with further comments on the traffic analysis in the DEIR. The report illustrates the extent to which the traffic impacts would be mitigated by scaling down the projects as described under "McCuen and Steele Application." (William G. Holliman, Jr.; McDonough, Holland & Allen)

Response: We concur that reducing the densities associated with the proposed Sammis Technology Center and the proposed Capitol Business Park would reduce the traffic impacts of these two projects below the level that was identified within the DEIR. However, the consideration of mitigating actions of this type was beyond the scope of the DEIR activities, and the DEIR only analyzed the projects at their proposed levels of development.

CBP I-2

Comment: While the traffic analysis described in the DEIR attempts to quantify the absolute nature of each project's traffic impacts, the methodology used places certain restrictions on the traffic forecasts, which leave room for disagreement on the accuracy of the absolute traffic levels and peak hour conditions projected. These specific restrictions include:

- o Limited shifting of travel demand in time, in response to congested traffic conditions
- o Prohibition of out-of-direction travel to avoid congested traffic conditions, and
- o Limited allowance of the combined effects of TSM measures, transit usage, and over-estimation of traffic levels by stand-alone-type trip generation rates.

The analysis does assume a 15 percent across-the-board reduction in traffic levels to reflect the City's current policy for trip reduction through TSM measures. This does not seem adequate. Intuitively, a more realistic adjustment would seem to be in the 20 to 25 percent range overall, with even higher adjustments for some trip types (for example, home-based work). This range of adjustment is consistent with the range of use in the South Sacramento/Laguna studies and the East Area Transportation studies. (Joseph R. Holland on behalf of McCuen & Steele)

Response: The potential for reducing traffic volumes within the South Natomas area by shifting travel demand in time, in response to congested traffic conditions, was accounted for within the traffic analysis described in the DEIR through the assumed 15 percent reduction in traffic volume due to the implementation of TSM measures by individual developments.

One of the stated limitations of the assignment procedure used in this transportation analysis is its inability to assign vehicles to a route that includes out-of-direction travel. In other words, the assignment procedure that was employed in this analysis will not allow any driver to travel away from his intended destination (in terms of total travel time) in order to eventually arrive at that destination. At first glance, this may appear to be a deficiency to the modeling process. However, to understand why this is not the case, consider the situation of a driver who elects to use out-of-direction travel in order to arrive at his destination. By electing to use out-of-direction travel, this driver is implicitly declaring the more direct route(s) to be intolerable in terms of congestion and/or total travel time. Thus, the driver's preferred route between his origin and destination has been denied to him because of congestion, and the driver is instead forced to take a second or third choice route. Therefore, to assign a vehicle trip to a route that contains out-of-direction travel does not actually reduce the level of frustration experienced by drivers using the transportation system; it only hides that frustration by assigning vehicles to out-of-direction routes that are apparently less congested. The assignment procedure in this analysis gives an accurate representation of the relative congestion levels that can be expected on the transportation system serving the South Natomas area when comparing each project alternative with the 1978 Plan Alternative. The procedure was a "capacity restraint" one, which means that as certain routes become congested, drivers are given the opportunity to select alternative routes to their destinations, as long as these routes do not include out-of-direction travel. Furthermore, the assignment procedure allows drivers traveling between a particular origin-destination pair to select any number of alternative routes, as long as these routes include no out-of-direction travel. Therefore, while the modeling process may not be entirely realistic, we believe that it yields reasonable results, especially when considered on a relative basis with the 1978 Plan Alternative.

We believe that the assumption of a 15 percent reduction in traffic volumes within the South Natomas area, due to the implementation of project-related TSM measures, is a reasonable and possibly optimistic estimate of the combined traffic effects of various TSM measures. It is important to realize that while individual TSM actions affect traffic volumes by as much as 5 to 10 percent, each additional TSM measure usually has a much smaller impact. The reason for this, of course, is that the population using the additional TSM measures is, to a large extent, the same population that used the original TSM strategy. Thus, for example, many of those who use staggered working hours are the same people that earlier used flex-time programs, and many of those who use the flex-time programs previously subscribed to ride-sharing programs such as car pools, van pools, and bus pools.

The tendency of stand-alone land use generation rates to over-estimate traffic levels when applied to a community or subregional sized study area is acknowledged. However, we believe that this tendency was accounted for in several ways within the traffic study performed as part of this DEIR. First, the model was calibrated to existing conditions prior to its application in the projection of future conditions. Second, it was assumed that 20 to 30 percent of all vehicle trips generated within each zone were destined to arrive at other internal points. As a result, we believe that the traffic volumes shown within the DEIR represent reasonable estimates of conditions that can be expected within South Natomas, given the projected level of development.

#### CBP I-3

Comment: The primary value of the DEIR's traffic analysis is for relative comparison between the various development scenarios evaluated. The relative peak hour traffic conditions associated with each development scenario are compared with those of the 1978 SNCP (as amended in 1982) to identify the relative differences in impacts. This approach is useful, as far as it goes; however, it would serve the purposes of comparison better if the peak hour conditions table for each development (Exhibits I-3 in Volume 2) also include similar data for each site's development as proposed by the Draft 1984 SNCP. (Joseph R. Holland on behalf of McCuen & Steele)

Response: We concur that it would have been desirable to include peak hour LOS analyses for each site's development as proposed by the Draft 1984 SNCP. However, the City Council directed that the Draft 1984 SNCP be prepared concurrently with the EIR development for each of the 11 individual projects, so it was not possible to provide this information at the time that the project EIRs were prepared.

CBP I-4

Comment: The tabular data accompanying these comments present just such a comparison for the Capitol Business Park site and the Sutter Business Center West site, including the current McCuen & Steele proposed development scenarios. These data were derived using the basic data presented in the EIR's with extrapolations based on the differences in trip generation levels for the respective sites. The EIR's trip generation rates were used, with a 12 percent reduction to nonresidential rates to parallel the adjusted procedure outlined in the DEIR. (Joseph R. Holland on behalf of McCuen & Steele)

Response: Comment noted. No response necessary.

CBP I-5

Comment: Exhibit 2 presents the various development scenarios and the associated peak hour traffic generation estimates for the Capitol Business Park development. Exhibit 3 presents the projected peak hour traffic conditions for each scenario at several key intersections evaluated by the EIRs. This exhibit corresponds to the Exhibits I-3 of Volume 2 of the DEIR, and shows the impacts on peak hour traffic conditions of the various development scenarios, while the rest of the South Natomas area remains as shown in the 1978 SNCP.

These two exhibits revealed the following important facts regarding the current McCuen & Steele proposed development scenario for the Capitol Business Park:

- o The McCuen & Steele proposal would generate 21 percent less traffic in the a.m. peak hour and 28 percent less traffic in the p.m. peak hour than the development scenario analyzed in the EIR.
- o With a few very insignificant exceptions, the projected traffic conditions of the McCuen & Steele proposal are equal to or better, in terms of saturation levels and/or service levels, than those estimated for the development scenario analyzed by the EIR.
- o When compared to the Draft-1984 SNCP development scenario, the projected traffic conditions of the McCuen & Steele proposal show saturation percentages which differ by -1 to +10 percentage points; however, only two level of service changes occur (at West El Camino/Azevedo a 1 percentage point increase results in the change from level B to level C, and at West El Camino/Truxel a 1 percentage point increase results in the change from level C to level D).

- o For all practical purposes the projected impacts on peak hour traffic conditions of the proposed McCuen & Steele development scenario for Capitol Business Park are similar to the traffic impacts of development of the site as proposed by the Draft 1984 SNCP. (Joseph R. Holland on behalf of McCuen & Steele)

Response: The conclusions stated within this comment appear to be reasonable, given the assumed reduction in development intensity for the site under the McCuen & Steele proposal, and the estimation of resulting levels of service. However, it should also be noted that the McCuen and Steele proposal still has a consistently greater traffic impact on the identified critical intersections than does either the 1978 SNCP Alternative or the Draft 1984 SNCP Alternative.

Capitol/80 Properties (CAP)  
Section C: Summary of Findings

CAP C-1, C-2, and C-3

Comment: Other beneficial effects of the project include:

1. Potential increase in housing demand in North Sacramento, which would enhance that community's ability to meet the goals of its existing community plan.

2. Assuming the Keyser Marston analysis is accurate, South Natomas MRD development will help to decrease traffic and related problems elsewhere in the region.

3. Many people believe that an adequately landscaped office or MRD project is more attractive for freeway drivers than the sound walls necessary to buffer residential developments from freeway noise. (Robert B. McCray; Weissburg and Aronson, Inc., representing project applicant)

Response: 1) Comment noted. No response necessary. 2) The Keyser Marston analysis does not address traffic impacts. This should not be inferred from their study. 3) Comment noted. No response necessary.

Capitol/80 Properties (CAP)  
Section I: Transportation

CAP I-1

Comment: The most significant problem with the model used to determine transportation impacts of the Capitol/80 Properties project is its failure to take into account "out-of-direction"

travel. In light of the close proximity of the project to Interstate 80, it is reasonable to expect that most employees bound for trip destinations to the south of the project will use Interstate 80 and Interstate 5 rather than driving south on Northgate Boulevard through West El Camino Avenue and/or Garden Highway. Therefore, it is apparent that the project will have fewer effects on the most congested intersections in South Natomas (maximum 5 percent traffic increase). The major traffic impact will be peak hour congestion occurring in the immediate vicinity of the project as employees leave for home, but this impact will be limited to the "New Street", and therefore will not affect many South Natomas residents. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: See response to comment on Volume 1, I-12.

#### CAP I-2

Comment: The use of LOS D as an unacceptable intersection LOS appears to be unreasonable for a major metropolitan area like the City of Sacramento. Most major urban cities and counties, including Sacramento County, have accepted LOS D as an undesirable but acceptable LOS. (Jeffrey E. Clark; TJKM, on behalf of project applicant)

Response: See response to comment in Volume 1, I-12A.

#### CAP I-3

Comment: In the EIR, the CH2M Hill model assigned traffic from the project with origins or destinations south on I-5 along a route south on Northgate, west on Garden Highway or El Camino, and then south on I-5. This does not seem to be the best route for trips using I-5 southbound. A better, faster, and less congested route would appear to be Northgate to I-80 to I-5. A reassignment of trips on this route would lessen the impacts to the West El Camino/Northgate and Garden Highway/Northgate intersections shown in the CH2M Hill report. (Jeffrey Clark; TJKM)

Response: A review of the output data generated by the travel demand forecasting model indicates that the model did use I-80 and I-5 as the primary route for southbound trips on I-5 that originate in the vicinity of the Capitol/80 Properties development. Some vehicle trips may also have been allowed by the model to travel southbound via West El Camino Avenue and/or Garden Highway as well, since the model used a multipath assignment algorithm. However, this is reasonable, because it takes into account the fact that not all drivers will select the minimum time-path route. Therefore, we believe that the model used very reasonable and realistic routes in assigning traffic between this project site and points to the south.

#### CAP I-4

Comment: The capacity deficiency intersection analyses (Exhibit I-4, page 49 of the DEIR) shows six intersections in the South Natomas area that are projected to be impacted by the Capitol/80 Properties project. In that exhibit the intersection of East Gateway Oaks Drive/West El Camino Avenue is shown to be significantly impacted by the Capitol/80 project (+4 in the p.m. peak hour). This seems to be unreasonable based on its distance from the project. It is unlikely that the traffic volumes from the Capitol/80's project would be so high in that area as to cause so significant an impact. Because of the reassignment of trips as described in an earlier section, impacts to the intersection of West El Camino/Northgate and Garden Highway/Northgate would be reduced from the +5 and +9 changes shown in Exhibit I-4. As for the other 3 intersections, West El Camino/Northbound I-5 off-ramp, West El Camino/Azevedo and Garden Highway/Truxel, Exhibit I-4 shows the impacts from the project as not significant. For this reason, these intersections should not be included as capacity-deficient intersections due to impacts from the Capitol/ 80 Properties projected traffic. (Jeffrey Clark, TJKM)

Response: Our review of the information contained in Exhibits I-3 and I-4 for the Capitol/ 80 Properties project revealed an error in the reported level of service and degree of saturation during p.m. peak hour conditions for the intersection of East Gateway Oaks Drive/West El Camino Avenue. The correct LOS should be an acceptable D level of service, and the correct degree of saturation should be 79 percent. Thus, the proposed project will have a +1 percent effect on the degree of saturation at this intersection when compared with the 1978 SNCP Alternative. These changes have been placed into the errata for these pages.

The impacts reported in Exhibit I-4 for the remaining intersections are correct. See response to comment on Volume 1, CAP I-3.

#### CAP I-5

Comment: An analysis of the impacts of both the 1984 Draft Community Plan (residential plus highway commercial) and 1984 Draft Community Plan with the proposed land use (MRD plus highway commercial) was completed. This reveals that, with the exception of the intersection of New Street and Northgate Boulevard, impacts due to changes in land use to intersections surrounding the project are small (+5 percent). At the New Street and Northgate Boulevard the impacts due to the change in land use are more substantial, but only in the p.m. peak hour with traffic exiting the site impacting the new street. This can be expected due to the more intense traffic peaking because of the MRD use. However, once this traffic has cleared the New Street/



Northgate intersection it mixes with traffic from other surrounding uses and its impacts tend to decrease. Thus, there is a reduction in the difference between the MRD and residential land use impacts on other intersections surrounding the site. (Jeffrey E. Clark; TJKM)

Response: Comment noted. No response necessary.

Capitol/80 Properties (CAP)  
Section K: Noise

CAP K-1

Comment: The proposed MRD development is compatible with the year 2000 noise levels on the project site, while residential development proposed by the Draft 1984 SNCP would require special mitigation measures. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: Comment noted. No response necessary.

Community Hospital (CH)  
Section A: Introduction

CH A-1

Comment: This comment, which appears in its entirety in Section 4, Comment Letters, contains a revised project description for the Community Hospital project. Aspects of the Draft 1984 SNCP relating to the Community Hospital site are also discussed. (Robert B. McCray; Weissburg and Aronson, Inc., on behalf of project applicant)

Response: Comment noted. No response necessary.

Community Hospital (CH)  
Section C: Summary of Findings

C-1

Comment: (Reference to Page 6, Growth-Inducing Impacts). The comment that the hospital project encourages additional nonresidential development in South Natomas lacks factual substantiation. It is more likely that the hospital project would encourage additional residential development because it will provide services which are necessary and desirable to residents of the area. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: The statement that the project could encourage additional nonresidential development in South Natomas was referring to development on immediately adjacent sites and was based on the fact that since hospital development could present conflicts with residential uses, other uses could well be applied for and receive approval. One only has to look at the area around other hospitals to see the proliferation of medical offices and other hospital-related businesses that a hospital can encourage.

#### CH C-2

Comment: The comment that the project "continues the precedent of amending the 1978 SNCP on a project-by-project basis," and the comment that the hospital project "displaces planned on-site housing to other areas of the city," ignore the fact that the 1984 SNCP, as proposed, designates the hospital site for hospital development. The hospital project has been included in the 1984 SNCP revision precisely to avoid continuation of community plan amendments on a project-by-project basis. Furthermore, the 1984 SNCP increases rather than decreases the projected population of the South Natomas community. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: The DEIR does not ignore the fact that the Draft 1984 SNCP designates the project site for hospital development. Rather the DEIR considers the consistency of the project with both the 1978 SNCP and the Draft 1984 SNCP. The 1978 SNCP is currently the legally-binding and adopted community plan for South Natomas and, under this plan, the site is designated for residential development.

#### CH C-3

Comment: (Reference to Page 6, Unavoidable Adverse Impacts). The hospital project is not inconsistent with the 1984 SNCP, nor is inconsistency per se an "adverse impact." From a community perspective, the substitution of a hospital/medical office building project for the residential/general office development is considered beneficial, not adverse. The accompanying community plan revision would therefore also be considered positive. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: A discussion of consistency with land use plans and policies is found in Section D, Land Use pages 13-16. The DEIR does not find the project inconsistent with the Draft 1984 SNCP; rather, the DEIR found the project to be consistent with the Draft 1984 SNCP. However, the project was found to be potentially inconsistent with two specific policies of the 1978 SNCP and the 1980 Housing Element (refer to Page 16). Section 15125 (b) of the State CEQA Guidelines requires that a DEIR discuss inconsistencies between the proposed project and

applicable plans. In addition, in the CEQA Guidelines, Appendix G, a conflict with adopted environmental plans is listed as a significant effect.

CH C-4

Comment: Commentor states that conclusions regarding traffic impacts are addressed below. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: Comment noted. No response necessary.

CH C-5

Comment: The summary of findings indicates that the project would increase traffic and contribute to unacceptable levels of service at four intersections in South Natomas, in addition to Interstate 5 itself. These statements are not supported by the DEIR's discussion of transportation issues (page 39, et seq.). As to the Interstate 5 impact, the DEIR states:

"While this is a significant adverse impact, the condition is not attributable to the proposed Community Hospital project since essentially the same condition exists under the 1978 plan alternative." (page 42)

This comment is equally applicable to the four intersections. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: It is true that the Community Hospital project does not, by itself, cause the unacceptable levels of service identified within the summary of findings. However, the DEIR is correct in noting that the project will increase traffic over conditions that would exist under the 1978 SNCP alternative, and that it will therefore contribute (incrementally) to the already unacceptable levels of service at the locations noted.

CH C-6

Comment: With respect to the four intersections identified in the summary of findings, a review of Exhibit I-4 at page 44 of the DEIR indicates that the project reduces rather than increases the traffic at the West El Camino/Northbound I-5 off-ramp, West El Camino/Northgate Boulevard, and in the a.m. peak hour at East Gateway Oaks Drive/West El Camino Avenue, and that the largest increase in traffic is 3 percent in the p.m. peak hour at the last named intersection. It appears that the last finding must be incorrect in that the hospital will produce a total number of trips, which is approximately 2 percent of the p.m. peak hour trips through the intersection, which is several

miles distant from the hospital (see further discussion below). (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: The reported impact of the Community Hospital project on the intersection of East Gateway Oaks Drive/West El Camino Avenue during the p.m. peak hour is in error. The correct level of service during the p.m. peak hour for the project alternative should be an acceptable D and the degree of saturation should be 78 percent (Exhibit I-4); the net change from the 1978 SNCP alternative should be zero. See also the errata to pages 42, 43, and 44.

Regarding the West El Camino/Northbound I-5 offramp and the West El Camino/Northgate Boulevard intersections, Exhibit I-4 (page 46) indicates that there would be a 1 percent reduction in traffic compared to the p.m. peak hour conditions under build-out of the 1978 SNCP Alternative. The project would, however, certainly contribute additional traffic as compared to the no-project (existing) condition. Since the identified intersections are projected to experience unacceptable levels of service, the impact of the proposed project was identified as potentially significant. It was also stated in the DEIR (I-4, footnote 2) that this project did not significantly contribute to the capacity deficiency of the intersection, however, the project does contribute incrementally to a cumulative traffic problem.

Community Hospital (CH)  
Section D: Land Use

CH D-1

Comment: The DEIR comments that the hospital project may detract from the residential character of development to the north and west of the hospital project. It should be noted that the 1984 SNCP, with its reduction of the space available for the hospital and medical office building project, would increase rather than decrease this possibility. If any reduction in land available for the combined project is made, that reduction should be at the north end of the parcel rather than at the southerly end adjacent to San Juan Road, as proposed by the 1984 SNCP. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: Comment noted. The commentor makes a valid point.

CH D-2

Comment: The DEIR comments that the hospital project would be "inconsistent with the general intent of the 1978 SNCP to develop South Natomas primarily as a residential community close to the CBD, since the project displaces planned residential uses; . . . ." This statement is wrong in that under the 1978

SNCP the residents of the South Natomas community would continue to travel outside of their community for medical services. Clearly, this is an undesirable condition. Therefore, the displacement of a small number of residential dwellings, which can be "recouped" to the South Natomas area (as demonstrated by the 1984 SNCP), is offset by the beneficial aspects of the project. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: Comment noted. The project is inconsistent since the plan does not designate a hospital site within the community; this inconsistency also applies to the site-specific land use designation. However, the DEIR recognizes that the provision of a hospital in South Natomas would have a positive impact on the community and highlights this on Page 9 under "Beneficial Impacts."

#### CH D-3

Comment: (Reference to Page 17). Note that the site plan for a combined hospital and medical office building project deletes the secondary side entrance on Larchwood Drive. It should be further noted, however, that the Sacramento City Fire Department may request inclusion of at least one emergency access from Larchwood Drive. (Robert B. McCray; Weissburg and Aronson, Inc.)

Response: Comment noted. No response necessary.

#### Community Hospital (CH) Transportation

#### CH I-1

Comment: The DEIR does not support the statement on page 42 that the hospital project would have a significant impact on six listed intersections in South Natomas. (Robert B. McCray, Weissburg and Aronson, Inc.)

Response: See response to preceding comments: CH C-5 and CH C-6.

#### CH I-2

Comment: Exhibit I-4 indicates that the hospital project will reduce traffic volumes at several listed intersections, and that two of the listed intersections are not capacity-deficient during the time period included in the DEIR. (Robert B. McCray, Weissburg and Aronson, Inc.)

Response: Comment noted. No response necessary.

CH 1-3

Comment: When considering the combined hospital/medical office building now proposed by Community Hospital, and comparing it with the 1978 and 1984 SNCPS, it is clear that the combined project will produce less peak hour traffic than either of those alternatives. Attachment "A" hereto demonstrates that, using the DEIR's trip generation rates, the hospital/medical office building project would produce 413 peak hour trips each day compared with 422 peak hour trips under the Draft 1984 SNCP, and 493 peak hour trips under the 1978 SNCP. Thus, the hospital/medical office building project decreases total traffic in the South Natomas community, and enhances rather than detracts from the environmental quality of the area. (Robert B. McCray, Weissburg and Aronson, Inc.)

Response: Comment noted. No response necessary.

Fong Ranch (FR)  
Section H: Public Facilities and Services

FR H-1

Comment: The City has acquired half of a neighborhood park site on the property to the west of the project site. The acreage for the second half of the neighborhood park will need to come from the Fong Ranch site. (City Department of Parks and Community Services)

Response: Comment noted. No response necessary.

Mercy Natomas Hospital (MNH)  
Section H: Public Facilities and Services

MNH H-1

Comment: An additional easement for a bikeway and parkway corridor will be needed along the western perimeter of the project site. (City Department of Parks and Community Services)

Response: Comment noted. No response necessary.

Natomas Corporate Center (NCC)  
Section B: Project Description

NCC B-1

Comment: Page 3. Per the existing Development Agreement and PUD Guidelines Section V B 2, the application proposes 25

percent minimum landscape coverage -- not 20 percent as stated in the DEIR. (Christina Prim; Hyde, Miller & Savage, on behalf of project applicant)

Response: Comment noted. See errata to Volume 2, Natomas Corporate Center, page 3.

#### NCC B-2

Comment: (Reference to page 3). The smallest proposed building is 9,000 sf, not 11,000 sf. (Christina Prim; Hyde, Miller & Savage)

Response: Comment noted. See errata to Volume 2, Natomas Corporate Center, page 3.

### Natomas Corporate Center (NCC) Section C: Summary of Findings

#### NCC C-1

Comment: The No-Project Alternative should assume the existing environment. The 65.4 gross acre site is already substantially developed as follows:

- 3.2 acres/I-5 corridor (already landscaped)
- 5.1 acres/streets completed or already graded
- 5.4 acres/98,065 sf completed structure
- 5.0 acres/87,579 sf structure under construction
- 6.84 acres/94,937 sf in two structures: special permits approved and building permit applications submitted in August 1984. Construction to commence Spring 1985 - probably prior to final action on the pending NCC application.

Thus, at the time this application is heard by the City Council, only 39.84 acres will be vacant. Furthermore, the applicant proposes reservation/dedication for Bannon Slough protection of 4.5 of these 39.84 vacant acres, resulting in new development on 35.34 acres -- all of which are currently zoned OB. (Christina Prim; Hyde, Miller & Savage)

Response: Comments noted. The DEIR reflected the existing environment at the time it was written. The above comment, however, provides additional and updated information which is hereby incorporated into the report.

#### NCC C-2

Comment: The application does not result in the loss of 62 acres of prime agricultural land. Instead, it simply increases

the density at which 35.34 vacant, developable, and currently OB zoned acres can be developed.

Given the irregular shape of these acres and the proximity of this vacant land to new office buildings on the west and Bannon Slough to the east, these 35.34 acres are not "prime agricultural land." (Christina Prim; Hyde, Miller & Savage)

Response: Comment noted. This application is unique among the projects considered since it represents an increase in density of an already approved project. In addition, the proposed addition of 81,000 sf of developed space would be spread throughout the site and not on any specific acreage. However, as acknowledged earlier in this commentor's letter, the EIR must consider impacts on the existing environment (as well as projected land uses of the site).

There are several ways to classify "prime agricultural land." One way is by soil type. Since the site qualifies as prime agricultural land according to its soil type (irrespective of whether or not urban uses are projected in the project vicinity) the impact was identified as significant. As stated on page 59 of the DEIR, however, the significance of the impact is decreased in light of existing and proposed urban land uses surrounding the site.

#### NCC C-3

Comment: The application is not inconsistent with existing approved land use plans. As required by statute, such plans were specifically amended prior to rezoning the site to OB and approving other entitlements in December 1982. (Christina Prim; Hyde, Miller & Savage)

Response: While the commentor is correct in stating that the specific on-site land use designations were amended prior to rezoning and approving of other entitlements, the general policies of several relevant plans were unaffected, and the proposal remains inconsistent with these policies. The DEIR summarizes relevant plans and assesses project consistency on pages 15-17. As discussed, the project is inconsistent with policies that development be consistent with adequate circulation, and with policies which would limit office development to that needed to serve the community (1978 SNCP). It is potentially inconsistent with numerous policies which stress revitalization of the CBD, to the extent that the project may impair the marketability of the CBD. Finally, since the proposed additional square footage adds to an already sizable level of proposed development, it is potentially inconsistent with a policy in the Draft 1984 SNCP to avoid large office districts which might attract development more suitably located downtown.



NCC C-4

Comment: The application is not inconsistent with the Draft 1984 SNCP. See attached December 13, 1984 letter to Diana Parker:

I. The Proposed Natomas Corporate Center (NCC) density is within the .42 maximum FAR recommended by Blayney.

NCC

65.4 gross acres  
(8.3 acres): I-5 corridor (3.2 acres) and streets  
(5.1 acres)

57.1 net acres, including 4.5 acres of Bannon Slough  
preserve and easement

Currently authorized OB = 793,313 sf divided by  
57.1 = 13.893/net acre

Proposed OB = 874,313 divided by 57.1 = 15,311 sf/  
net acre

Blayney's Maximum FAR

.42 x 43,560 = 18,300 sf/net acre

Therefore, proposal is 3,000 sf/acre less than Blayney's  
maximum FAR.

Note:

Open space setbacks are typically and properly included within net acres; accordingly, the Bannon Slough open space easement and preserve area should be included within net acres. However, even if the 4.5-acre Slough buffer area in NCC is excluded from net acres, the proposed NCC density is still under Blayney's maximum.

874,313 divided by 52.6 = 16,622 sf/per net acre

II. The pending Natomas Corporate Center application is consistent with the office location principles listed on page 25 of the Blayney Plan.

A. The site fronts the freeway, abuts major roads to the north and south, and adjacent to Bannon Slough to the east; accordingly, the location:

1. minimizes office travel through residential areas in that two freeway interchanges are closely proximate to the site.

2. is buffered from residential areas. The four-sided buffer prevents dilution of the character of nearby residential development and acts as a design transition - supplemented by deep setbacks - between office and residential uses.

B. The application does not propose rezoning additional acreage to OB; therefore, the linear office park principle is inapplicable to this application. (Christina Prim; Hyde, Miller & Savage)

Response:

I. Comment acknowledged. The Draft 1984 SNCP sets a Maximum Floor Area Ratio (the floor area divided by the lot area) of .42 for office parks, without specifying whether this is based on net or gross area.

However, in determining the office space projected for the site by the Draft 1984 SNCP, we referred to a preliminary site-specific land use plan developed by Blayney-Dyett according to traffic zone. The subject site is traffic zone 49 and is designated for 793,313 sf of office space development (the amount currently approved). This estimate was used for all analyses of impacts including traffic, communitywide service provision, communitywide office provision, etc. If both the subject application and the Draft 1984 SNCP were approved, there would be an additional 81,000 sf office space projected in South Natomas than under the Draft Plan. For this reason, the project was considered inconsistent.

II. The proposed project is inconsistent with the Draft 1984 SNCP policy of not locating additional office area east of I-5. As discussed in the paragraph above, the project proposes 81,000 sf of office space development above that projected for the site under the Draft 1984 SNCP.

NCC C-5

Comment: In Resolution 82-855, the City Council made the following finding in approving the 1982 Creekside Office Park project:

"That the potential loss of trees within the First Bannon Slough riparian woodland habitats (disclosed as a potentially significant unavoidable or irreversible impact in the DEIR) has been reduced to a less than significant impact by the ... 40 feet area of land (as shown on the Creekside schematic) coupled with a relocation of an east-west street to a location satisfactory to the City."

The current application proposes the east-west street in the location approved by the City in 1982. Accordingly, the City Council has already found that this street will not cause any significant negative environmental impact. (Christina Prim; Hyde, Savage & Miller)

Response: The location of the collector street (Natomas Park Drive) proposed in the November 1984 DEIR is superior from a biological standpoint to the road alignment originally proposed in the October 1981 DEIR on the Creekside Office Park. The current alignment will have far less impact on the vegetation of Bannon Slough because the northern part of the slough is sparsely vegetated and degraded. However, a new collector road through the slough, no matter where it is located, will still have an impact on wildlife. Aside from additional fragmentation of the slough and its value as wildlife habitat, a new roadway is likely to result in increased human disturbance of the southern portion of the slough. If the main part of the slough could be protected from increased human disturbance from construction activities, and future recreational use, the impacts of the new road could be reduced to less than significant levels. Fragmentation of Bannon Slough as a travel corridor, however, would still be considered an impact on wildlife although it would not be significant.

#### NCC C-6

Comment: The traffic impact summary on page 7 is partially inconsistent with Exhibits I-3 and I-4 on pages 42 and 43, does not quantify the magnitude of this project's contribution to congested intersections, and does not indicate that this project improves traffic at some intersections listed on the page 7 chart. (Christina Prim; Hyde, Miller & Savage)

Response: We concur that the traffic impact summary on page 7 is in error when it states that this project will have an adverse traffic impact on the intersection of West El Camino Avenue/I-5. In addition, it should be noted that Exhibits I-3 and I-4 overestimate the effects of the project on the intersection of East Gateway Oaks Drive/West El Camino Avenue during the evening peak hour. See corrected revisions to these two exhibits as follows.

#### Natomas Corporate Center (NCC) Section D: Land Use

#### NCC D-1

Comment: (Reference to Page 13). The additional office space requested by the pending application would not be increased from 15,082 to 16,609 sf net acre; instead, the sf net acre would be increased from 13,893 to 15,311. See attached

December 13, 1984 letter to Diana Parker included under Comment C-4. (Christina Prim; Hyde, Miller & Savage)

Response: We cite a February 27 letter from William Krum of the KCS Development Company which calculates the December 1982 approved density of the site and the revised density requested.

"The square footage of office density per net acre in Natomas Corporate Center originally approved in 12/82 is 15,082 sf/acre, calculated as follows:

Gross Acreage:		65.4
Less: Property unavailable for development		
Public Streets	(5.1)	
I-5 Scenic Corridor	(3.2)	
40' Recreational Easement	(1.8)	
Bannon Slough Preserve	(2.7)	4.5
		<u>12.8</u>
Net Property in Acres		52.6

December 1982 approved office space:	793,313 sf
December 1982 approved density:	<u>793,313 sf</u> 52.6 acres
	= <u>15,082 sf/acre</u>

. . . Increasing our authorized office space by 81,000 square feet (from 793,313 to 874,313 sf) would increase our density per net acre to:

874,313 sf divided by 52.6 acres = 16,622 sf/acre."

The reference to 16,609 sf on page 13 was a misprint and should be 16,622 sf; see errata to page 13.

The revised numbers cited by the commentor were obtained by adding in 4.5 acres of Bannon Slough open space area (1.8 acres recreation easement plus 2.7 acres Bannon Slough Preserve) into the net acreage calculation.

Natomas Corporate Center (NCC)  
Section G: Housing

NCC G-1

Comment: The paragraph entitled "Increased residential densities" does not apply to this project. (Christina Prim; Hyde, Miller & Savage)

Response: Comment acknowledged. Refer to the errata to Volume 2, Natomas Corporate Center, page 26 for amendments to the paragraph.

NCC G-2

Comment: The DEIR should acknowledge that (a) dedication and maintenance of the Bannon Slough preserve is part of the application; and (b) with respect to the preserve area, the existing development agreement is inconsistent with the 1984 Draft SNCP whereas the application is consistent with the 1984 Draft SNCP and the DEIR. (Christina Prim; Hyde, Miller & Savage)

Response: Comments noted. The DEIR does mention dedication to the City of land along Bannon Slough several places in the report including: pages 3, 9, 13, 15, 35, 66, and 69. The DEIR also acknowledges that the application is superior to the 1978 SNCP Alternative in terms of the protections offered to the Bannon Slough area (pages 36 and 68). Regarding consistency with the Draft 1984 SNCP, the report refers the reader to a discussion of the 1978 SNCP Alternatives in other sections. See also errata to page 13.

Natomas Corporate Center (NCC)  
Section H: Public Services and Facilities

NCC H-1

Comment: The City would acquire the Bannon Slough Parkway and oak preserve as a dedication not an easement. (City Department of Parks and Community Services)

Response: Comment noted. No response necessary.

Park El Camino (PEC)  
Section B: Project Description

PEC B-1

Comment: The DEIR analyzed Park El Camino on the basis of the application previously submitted, which was for an office park. During the community meeting process and when alternative community plans were submitted, it became apparent that a portion of Park El Camino would be designated highway/commercial. On July 10, 1984, this office wrote the Planning Department advising of the desire of Park El Camino to amend its application to designate 9 acres of the site to be highway/commercial and the balance to be office building. Enclosed herewith is a copy of the letter together with its enclosure.

The DEIR analyzed the project as if it were an office park and noted that the project was inconsistent with the revised Draft Community Plan. Therefore, the applicant will, before January 15, 1985, formally amend its application to request the highway/commercial and office building designations so that it will be consistent with the Community Plan. (Hermann E. Lorenz; Lorenz and Cutter, on behalf of project applicant)

Response: Comment noted. Interested persons should refer to the July 10, 1984 letter from Hermann E. Lorenz of Lorenz and Cutter in Section 4, Comment Letters for the enclosure referred to above.

River View Oaks (RVO)  
Section C: Summary of Findings

RVO C-1

Comment: The preparers determined that the conversion of 37 acres of prime farmland to urban use is an unavoidable adverse impact. We disagree that this is unavoidable or even adverse. Although CEQA Guidelines suggest that the conversion of prime farm land to urban use be discussed as a significant effect, we believe that discussion must be taken in its proper context. The subject site is proposed to be surrounded by residential and other urban uses which, if said uses were actually implemented, would make it extremely difficult to use the subject site for agricultural purposes. (Robert S. Willett; Hefner, Stark & Marois, on behalf of project applicant)

Response: Comment noted. The DEIR recognizes this issue in the discussion of impacts on page 63. "The significance of this impact (the conversion of prime agricultural land) is decreased, however, because of the existing and proposed urban land uses which surround the site ...". See also response to comment C-2 of the Natomas Corporate Center EIR (NCC C-2).

RVO C-2

Comment: The preparers identified inconsistency with existing plans and policies as an unavoidable adverse impact. The DEIR further discloses that the River View Oaks proposal is inconsistent with existing plans and policies which identify the subject site for residential purposes. We think it should be noted that the existing 1978 South Natomas Community Plan policies and plans are themselves inconsistent with the conversion of prime agricultural land to urban uses. Further, any use of the land will contribute to some degree to the traffic congestion. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comments noted. The DEIR identifies that the impact of conversion of 37 acres of prime agricultural land would also occur under the 1978 SNCP in Exhibit D-2 (Page 16).

Also on Page 64, the DEIR states: "The soils impacts and mitigation measure would be the same for the residential development planned for the River View Oaks site in the 1978 SNCP as for the office development of the proposed project."

RVO C-3

Comment: The DEIR identifies a contribution to traffic congestion and unacceptable levels of service as an unavoidable adverse impact. We take issue with the conclusion that this particular project contributes to traffic uses to the level of an unavoidable adverse impact. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comment noted. Refer also to responses to comments on Section I, Transportation for this project.

RVO C-4

Comment: The DEIR identifies obstruction of views from riverfront areas and parkways as an unavoidable adverse impact. The suggestion that the project will obstruct views "from the riverfront area and parkways" without more certainty cannot be considered adverse as an impact.

On page 18, the DEIR states that the project is potentially inconsistent with the character of the Riverfront District to the south. As is further discussed in our comments regarding aesthetics, we do not concur with this view. In addition, the DEIR states that the project conflicts with the Draft 1984 SNCP in that it would "block views of the Sacramento River." Given the location of the project, we can see no way in which this project blocks any views of the river. Indeed, it creates tremendous views of the river for the occupants and users of the structure. (Robert S. Willett; Hefner, Stark & Marois)

Response: The finding was based on the fact that the project would include a 10-story office structure. A structure of this size would have a significant impact on the existing character of the area. While the project would provide views of the river for occupants of the structure, as noted by the applicant, it would also be visible to users of the parkway, the river, and riverfront area and Garden Highway.

River View Oaks (RVO)  
Section D: Land Use

RVO D-1

Comment: (Reference to Section D, Land Use, pages 13-20). Apparently the preparers have determined that if a project as proposed is inconsistent with an existing community plan or

goals or policy, then the project ipso facto has a potential significant effect on the environment. We perceive such a comparison of existing plans and policies with newly proposed plans and policies as land use rather than environmental issues. We are aware that City staff takes the position that Appendix G to the CEQA and EIR Guidelines suggests that projects proposed which are inconsistent with existing goals of the community should be declared significant environmental impacts. We disagree with that interpretation. It would be interesting whether the Staff would find that a significant environmental impact is disclosed if the project proponent were to offer the subject site as permanent open space as opposed to the project actually proposed. In both instances the proposal would be inconsistent with existing plans and community goals. (Robert S. Willett; Hefner, Stark & Marois)

Response: We quote from the first lines of Appendix G of the CEQA Guidelines. "A project will normally have a significant effect on the environment if it will: a) conflict with adopted environmental plans and goals of the community where it is located; ..."

If a project proponent were to offer a site as permanent open space, and this use was inconsistent with existing plans and policies, the impact would be identified as such.

River View Oaks (RVO)  
Section H: Public Facilities and Services

RVO H-1

Comment: Commentor agrees that the cost of any specialized fire equipment should be equitably assessed against all users whether such users are located in South Natomas or elsewhere in the City. The DEIR fails to disclose whether existing equipment in the City can service the River View Oaks site. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comment noted. As stated in Volume 2 on page 35 of the River View Oaks DEIR, the site design proposes multistory buildings which would require that a ladder truck be available. While there are ladder trucks available elsewhere in the City, they are not considered adequate to serve the project site because of the long initial response time to the site. When the new station west of I-5 is completed, a ladder truck will be available to serve the River View Oaks site.

RVO H-2

Comment: The DEIR states that the multistory buildings proposed for the River View Oaks site would aesthetically impact



the recreation quality of the undeveloped park site to the east, the Sacramento River, and planned main canal parkway to the west. We believe that the EIR overstates the impact of the building on the recreational quality of the area. The proposed project will be thoroughly landscaped throughout and have extensive peripheral landscaping. There is no evidence in the EIR to support the idea that recreational quality will be impacted due to the height of the project. High density residential use is proposed on the property to the north of the project site. There are commercial and semi-industrial uses to the west and to the south of the proposed project. (Robert S. Willett; Hefner, Stark & Marois)

Response: The DEIR states, on page 39, that imposition of high rise office buildings in an otherwise seminatural setting may adversely impact recreation quality and that landscaping or other forms of screening could not fully mitigate this impact. Although aesthetic impact findings are inherently value judgments, the conclusions in the report are based on our professional experience in urban planning.

#### RVO H-3

Comment: We do not feel that the loss of funds for park purposes by conversion of residentially planned property to a nonresidential use has an adverse impact on the physical environment. The EIR should fully discuss in what respect such a loss of financing, because of a change in use, constitutes an environmental impact on the physical environment. (Robert S. Willett; Hefner, Stark & Marois)

Response: The physical environment is not the only consideration in determining whether an impact is significant. Section 21083(c) of the CEQA requires an effect to be found significant if the project will cause substantial adverse effects on humans. The loss of funding for parks in South Natomas due to the proposed change in use would adversely affect humans. Residents in South Natomas would be deprived of open space as well as the recreational and social opportunities provided by parks.

#### River View Oaks (RVO) Section I: Transportation

#### RVO I-1

Comment: The DEIR, though very comprehensive, still does not treat the positive transportation impacts of the project as having a place in the analysis. Specifically, a job/housing balance increase caused by the project will reduce the demand for external travel from the South Natomas community and allow

traffic reductions across key portals at the community boundary. (Robert S. Willett; Hefner, Stark & Marois)

Response: We concur that increasing the job/housing ratio in any community will generally result in a higher proportion of generated vehicular trips remaining entirely within that community. This, in turn, can have the effect of reducing total vehicle miles of travel, total fuel consumption, and total exhaust emissions within the region. However, the effect of River View Oaks project on the job/housing balance within the South Natomas area is not a substantial one. A small change may occur, but this small change in the total job/housing ratio for South Natomas will have a minimal effect on the internal/external split of vehicular trips within the community, and on the overall efficiency of the transportation system serving the South Natomas community. Further, the River View Oaks project would result in a substantial increase in the number of vehicular trips generated when compared with the 1978 SNCP Alternative. In particular, the property that is to be used by the River View Oaks project is expected to generate approximately 100 one-way vehicular trips during the a.m. peak hour under the 1978 SNCP Plan Alternative, but nearly 1,300 vehicle trips if the River View Oaks project is completed. This is a substantial increase in the number of vehicle trips generated by this property. A similar condition exists during the evening peak hour.

#### RVO I-2

Comment: The intersection analysis suggests negative impacts due to the project which, on reflection, are not as severe as may first be thought. Your attention is drawn to Exhibit I-3 and I-4 on pages 46 and 47 of the draft EIR, Volume 2, River View Oaks section, and also the summary table shown on page 7 of the same section. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comment noted. No response necessary.

#### RVO I-3

Comment: In the summary table on page 7, four intersections and one section of the freeway are listed as locations where "the project would increase traffic and contribute to unacceptable levels of service (incapable of feasible mitigation)...". (Robert S. Willett; Hefner, Stark & Marois)

Response: Comment noted. No response necessary.

RVO I-4

Comment: As noted on page 7, the intersection of West El Camino Avenue/Northbound I-5 interchange changes its degree of saturation by +3 percent and -2 percent in the morning and evening peak hours due to this project. These changes are not significant. (Robert S. Willett; Hefner, Stark & Marois)

Response: The effect of the River View Oaks project on the West El Camino Avenue/Northbound I-5 interchange is not large, as noted in Exhibit I-4 of the DEIR. However, the impacts are considered to be significant, since they represent an increased traffic burden during the morning peak hour to an intersection that is already experiencing an unacceptable LOS.

RVO I-5

Comment: At the intersection of West El Camino Avenue/Northgate Boulevard, the change in degree of saturation due to the project is even less, +1 percent and -1 percent in the morning and evening peaks, respectively. Exhibit I-4 notes that this project does not contribute significantly to the capacity deficiency of the intersection, though it also notes that the project does contribute to the cumulative traffic. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comment noted. No response necessary.

RVO I-6

Comment: At the intersection of Garden Highway/Northbound I-5 ramps, the project adds 9 percent to saturation levels in the morning peak. However, the levels of service expected at that time are A or B, both adequate levels. In the evening peak, the 7 percent increase in the saturation level due to the project still leaves the service level at D, the service level of the South Natomas Community Plan. Furthermore, we feel that there are additional mitigations that can be provided at that intersection, which will improve the service levels. (Robert S. Willett; Hefner, Stark & Marois)

Response: Exhibit I-4 of the DEIR acknowledges that the intersection of Garden Highway/Northbound I-5 ramps is not expected to be capacity deficient during the a.m. peak hour, even with the introduction of traffic generated by the River View Oaks project. During the evening peak hour, the addition of project-generated traffic increases the degree of saturation at the intersection from 80 percent (which is considered marginally acceptable) under the 1978 Plan alternative, to 87 percent (which is considered unacceptable) under the River View Oaks alternative. This is considered to be a significant adverse impact to the operation of the intersection.

We are aware of no additional feasible mitigation measures for alleviating the capacity deficiency at this intersection during the evening peak hour beyond those that are identified within the DEIR.

RVO I-7

Comment: At the intersection of Garden Highway/Northgate Boulevard, the project adds 6 percent and 7 percent in the morning and evening peak hours, respectively. However, this intersection is significantly overloaded in the evening peak, with a degree of saturation about 200 percent, i.e., the demand is twice the supply. An addition of 7 percent on 200 percent seems very small, to the point of insignificance. If the overload is so major, with or without the River View Oaks projects, and additionally the Arden-Garden connector is to be built, it is clear that this intersection requires substantial mitigations, such as a grade separation. (Robert S. Willett; Hefner, Stark & Marois)

Response: Any additional traffic demand that is placed upon an already capacity-deficient intersection is considered to be significant, since it represents an extension of the time period during which congested conditions are likely to occur. As mitigation for this capacity deficiency, the DEIR considers both the widening of Northgate Boulevard and the construction of a grade separation. However, it was found that neither of these measures would result in an acceptable LOS at this intersection during the evening peak hour, given the projected travel demands. In addition, it was noted that neither the construction of three lanes on Northgate nor construction of grade separation facilities is considered by City staff to be a feasible solution, as it does not represent an efficient use of resources and would only shift the problem to other locations on Northgate Boulevard and/or Garden Highway.

RVO I-8 and RVO I-9

Comment: The congested section of Interstate 5, presumably at the location of the American River south of the Garden Highway, is referred to in the text of the DEIR on page 48 where it says:

"...the condition is not attributable to proposed River View Oaks project since essentially the same condition exists under the 1978 Plan Alternative."

It seems to us that reading the summary table alone, a decision that most readers may take, given the size of the documents, could lead the reviewer to believe that the impacts on the

project are much more significant than they may first appear. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comments noted. No response necessary.

River View Oaks (RVO)  
Section J: Air Quality

RVO J-1

Comment: We disagree with the DEIR concerning the significance of traffic-related emissions from the project. In addition, if the proposed office development would occur elsewhere in the Sacramento area in any event (as suggested in the Employment section of the EIR), there would be no emissions increase due to the project. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comments noted. The basis for the discussion of emissions produced by project-generated traffic is clearly outlined in Exhibit J-1 of the DEIR. Whether an impact could occur elsewhere in the region or not, the impact must still be identified in order to fulfill the provisions of CEQA.

River View Oaks (RVO)  
Section M: Geology and Soils

RVO M-1

Comment: The EIR states that there is no mitigation for the loss of 37 acres of prime agricultural land. The EIR should disclose that if either the 1978 Plan or the proposed 1984 Plan is implemented, the loss of prime agricultural land will take place. It is unlikely that the property would be commercially farmed due to proposed urban uses in the area (Robert S. Willett; Hefner, Stark & Marois)

Response: The River View Oaks DEIR states, on page 64, that the soils impacts of the 1978 SNCP alternative would be the same as for the proposed project. This means that 37 acres of prime agricultural land would be removed from production if the 1978 SNCP were implemented. The impacts of the proposed 1984 SNCP are discussed in Volume 1 of the DEIR on page M-2. The Draft 1984 SNCP would also result in the removal of prime agricultural land from production. We agree that if the area surrounding the project site urbanizes it is unlikely that the property would continue to be commercially farmed. This lessens the impact but does not reduce it to below a level of significance.

River View Oaks (RVO)  
Section P: Aesthetics

RVO P-1

Comment: (Reference to Section P, pages 73-74) The proponents of the proposed River View Oaks project take strong exception to the position that the proposed project would adversely affect the aesthetics of the site and the surrounding area. Indeed, it is the proponents' belief that a well designed office building in this location, in proximity to the Sacramento River, would, in fact, enhance the aesthetics of the area and be wholly consistent with the historical and future nature of the development along the Sacramento River. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comment noted. Consideration of aesthetic value is inherently subjective. However, a 10-story office structure was found to be not consistent with either the historical natural of development along the Sacramento River since it provides for a much more intensive urban use than any previous development. It was also found to be inconsistent with the future planned uses along the riverfront which include height restrictions and which call for low-density residential development in the project vicinity.

RVO P-2

Comment: The DEIR in the sections dealing with land use, parks and especially aesthetics, refers to the height of the building as an adverse impact which could be reduced to a less than significant effect if the height of the building were reduced. The DEIR states, among other things, that the height of the structure could adversely affect the view from "Garden Highway and the Riverfront District." It is difficult for us to understand the manner in which this project would affect such views. While it is true that, under the present use of the land, the view from Garden Highway would be a mix of development underway, the freeway and some open space agricultural lands, under both the 1978 SNCP as amended and under the 1984 draft SNCP, the view from Garden Highway would be the roof tops of single-family residences on the site, the roof tops of multi-family units on nearby parcels, and a mix of other urban uses, such as office buildings. (Robert S. Willett; Hefner, Stark & Marois)

Response: Refer to the response to P-1 above. The area views from Garden Highway and the riverfront area are predominantly of open space and nonintensive commercial uses. Project implementation would involve a significant change in views from these areas. Also, the commentor stated previously (in Comment P-1) that the future occupants of the structure would have excellent views of the river. If this is so, then

the users of the river would also have views of the office building.

RVO P-3

Comment: With respect to the views from the Riverfront District, we do not concur that this project would adversely affect that view. Under the present land uses and the proposed SNCP, the view from the Riverfront District to the north would be the levee and the trees along the levee. While the project would be somewhat visible, there is no basis in fact for stating that a well designed office building would be a detriment to the urban landscape. While we believe the comments on visual impact are generally inappropriate, we wish to note that the DEIR fails to disclose visual impacts in the immediate vicinity of the site including an existing boat facility on filled land (directly to the west of the site) which is at the same level as the top of the levee and the nearby McClellan Dock area.

In evaluating the visual effects of this building in relationship to the Sacramento River, the DEIR should recognize not only the historical nature of that river but also current uses and planning efforts underway along that river with which this office building is wholly consistent.

In the earliest days of this City's development, the Sacramento River was a commercial hub. Unlike the American River, which has by policy been preserved in an open space character, the Sacramento River has always been an urban river which was used historically for commercial shipping purposes and today supports a great deal of activity. Indeed there are a variety of urban uses including highrise buildings (i.e., the 19-story Capitol Bank of Commerce building, crop storage silos), visible to boaters plying the Sacramento River.

In addition, it is important to note that, as the DEIR is considered, there are tremendous efforts being undertaken along the riverfront by the City of Sacramento itself to enhance the commercial nature of the river. The Sacramento Housing and Redevelopment Agency is rebuilding the historical wharf and will be mooring to that wharf several large ships which will be used for commercial and entertainment purposes. The City is preparing to develop the Docks Area south of the Tower Bridge with a potential mix of commercial and residential uses.

Further, it is our understanding that the City is proposing a dramatic expansion of the marina in Freeport to accommodate the increased demand by boaters for access to the river. Of direct interest to this project is the fact that the City has approved the Riverfront Holding Company's development directly to the south of the project which includes an extensive marina, condominium development and restaurant complex. Beyond these existing or proposed uses on the Sacramento side of the river,

it should be additionally noted that Yolo County has been actively considering a range of intensive uses abutting the Sacramento River.

When taken in the context of the variety of activities now being planned by public agencies themselves and by private interests (with public approvals), the River View Oaks project is wholly consistent with efforts to make the Sacramento River a focal point of urban development. (Robert S. Willett; Hefner, Stark & Marois)

Response: Comments noted. However, we wish to reiterate that the level of urbanization proposed with a 10-story structure is well beyond that currently existing or planned along the South Natomas portion of the Sacramento River.

Sammis Technology Center (STC)  
Section C: Summary of Findings

STC C-1

Comment: We respectfully disagree with the finding in the DEIR that "conversion of agricultural land" is a significant adverse impact and one which cannot be mitigated. Even under a "no project" alternative, preservation of the remaining agricultural land within the South Natomas Community Plan area is no longer feasible in view of the urbanization of the area which has already occurred. More importantly, however, the decision that the South Natomas area should be urbanized was made many years ago, subsequent to consideration of environmental assessments at that time and the Draft 1984 Community Plan does not result in any such impact. (William G. Holliman, Jr.; McDonough, Holland & Allen, on behalf of McCuen & Steele)

Response: See response to Volume 1, C-1 comment.

STC C-2

Comment: We also disagree with the finding that six of the seven intersections described in the summary table, Exhibit C-5, will result in significant adverse impacts which cannot be mitigated to a less than significant level (William G. Holliman, Jr.; McDonough, Holland & Allen)

Response: Comment noted. No response necessary.



Sammis Technology Center (STC)  
Section I: Transportation

STC I-1

Comment: There are both changes in the projects and mitigation measures which may be taken to substantially reduce the traffic impact of the projects as defined in the DEIR. In response to the DEIR and the traffic analysis, we intend to substantially reduce the densities of both projects as originally proposed and to submit revised plans and mitigation of the impacts set forth in the DEIR. We have attached hereto a report from Joseph R. Holland, consultant traffic engineer, with further comments on the traffic analysis in the DEIR. The report illustrates the extent to which the traffic impacts would be mitigated by scaling down the projects as described under "McCuen & Steele Application." (William G. Holliman, Jr.; McDonough, Holland & Allen)

Response: We concur that reducing the densities associated with the proposed Sammis Technology Center and the proposed Capitol Business Park would reduce the traffic impacts of these two projects below the level that was identified within the DEIR. However, the consideration of mitigating actions of this type was beyond the scope of the DEIR activities since the DEIR only analyzed the projects at their proposed levels of development.

STC I-2

Comment: While the traffic analysis described in the DEIR attempts to quantify the absolute nature of each project's traffic impacts, the methodology used places certain restrictions on the traffic forecasts which leave room for disagreement on the accuracy of the absolute traffic levels and peak hour conditions projected. These specific restrictions include:

- o Limited shifting of travel demand in time, in response to congested traffic conditions
- o Prohibition of out-of-direction travel to avoid congested traffic conditions, and
- o Limited allowance of the combined effects of TSM measures, transit usage, and over-estimation of traffic levels by stand-alone-type trip generation rates.

The analysis does assume a 15 percent across-the-board reduction in traffic levels to reflect the City's current policy for trip reduction through TSM measures. This does not seem adequate. Intuitively, a more realistic adjustment would seem to be in the 20 to 25 percent range overall, with even higher adjustments for some trip types (for example, home based work).

This range of adjustment is consistent with the range of use in the South Sacramento/Laguna studies and the East Area Transportation studies. (Joseph R. Holland, on behalf of project applicant)

Response. The potential for reducing traffic volumes within the South Natomas area by shifting travel demand in time, in response to congested traffic conditions, was accounted for within the traffic analysis described in the DEIR through the assumed 15 percent reduction in traffic volume due to the implementation of TSM measures by individual developments.

One of the stated limitations of the assignment procedure that was used in this transportation analysis is its inability to assign vehicles to a route that includes out-of-direction travel. In other words, the assignment procedure that was employed in this analysis will not allow any driver to travel away from his intended destination (in terms of total travel time) in order to eventually arrive at that destination. At first glance, this may appear to be a deficiency to the modeling process. However, to understand why this is not the case, consider the situation of a driver who elects to use out-of-direction travel in order to arrive at his destination. By electing to use out-of-direction travel, this driver is implicitly declaring the more direct route(s) to be intolerable in terms of congestion and/or total travel time. Thus, the driver's preferred route between his origin and destination has been denied to him because of congestion, and the driver is instead forced to take a second or third choice route. Therefore, to assign a vehicle trip to a route that contains out-of-direction travel does not actually reduce the level of frustration experienced by drivers using the transportation system; it only hides that frustration by assigning vehicles to out-of-direction routes that are apparently less congested. The assignment procedure in this analysis gives an accurate representation of the relative congestion levels that can be expected on the transportation system serving the South Natomas area when comparing each project alternative with the 1978 ANCP Alternative. The procedure was a "capacity restraint" one, which means that as certain routes become congested, drivers are given the opportunity to select alternative routes to their destinations, as long as these routes do not include out-of-direction travel. Furthermore, the assignment procedure allows drivers traveling between a particular origin-destination pair to select any number of alternative routes, as long as these routes include no out-of-direction travel. Therefore, while the modeling process may not be entirely realistic, we believe that it yields reasonable results, especially when considered on a relative basis with the 1978 SNCP Alternative.

We believe that the assumption of a 15 percent reduction in traffic volumes within the South Natomas area due to the implementation of project-related TSM measures is a reasonably and possibly optimistic estimate of the combined traffic effects of various TSM measures. It is important to realize that, while

individual TSM actions affect traffic volumes by as much as 5 to 10 percent, each additional TSM measure usually has a much smaller impact. The reason for this, of course, is that the population using the additional TSM measures is, to a large extent, the same population that used the original TSM strategy. Thus, for example, many of those who use staggered working hours are the same people that earlier used flex-time programs, and many of those who use the flex-time programs previously subscribed to ride-sharing programs such as car pools, van pools, and bus pools.

The tendency of stand-alone land use generation rates to overestimate traffic levels when applied to a community or subregional sized study area is acknowledged. However, we believe that this tendency was accounted for in several ways within the traffic study that was performed as part of this DEIR. First of all, the model was calibrated to existing conditions prior to its application in the projection of future conditions. Secondly, it was assumed that 20 to 30 percent of all vehicle trips generated within each zone were destined to other internal points. As a result, we believe that the traffic volumes shown within the DEIR represent reasonable estimates of conditions that can be expected within South Natomas, given the level of development that is projected.

#### STC I-3

Comment: The primary value of the DEIR's traffic analysis is for relative comparison between the various development scenarios evaluated. The relative peak hour traffic conditions associated with each development scenario are compared with those of the 1978 SNCP (as amended in 1982) to identify the relative differences in impacts. This approach is useful, as far as it goes; however, it would serve the purposes of comparison better if the peak hour conditions table for each development (Exhibits I-3 in Volume 2) also include similar data for each site's development as proposed by the Draft 1984 SNCP. (Joseph R. Holland)

Response: We concur that it would have been desirable to include peak hour LOS analyses for each site's development as proposed by the Draft 1984 SNCP. However, the City Council directed that the Draft 1984 SNCP be prepared concurrently with the EIR development for each of the 11 individual projects, and so it was not possible to provide this information at the time that the project EIRs were prepared.

#### STC I-4

Comment: The tabular data accompanying these comments present just such a comparison for the Capitol Business Park site and the Sutter Business Center West site, including the

current McCuen & Steele proposed development scenarios. These data were derived using the basic data presented in the EIRs with extrapolations based on the differences in trip generation levels for the respective sites. The EIR's trip generation rates were used, with a 12 percent reduction to nonresidential rates to parallel the adjusted procedure outlined in the EIR. (Joseph R. Holland)

Response: Comment noted. No response necessary.

STC I-5

Comment: Exhibit 4 presents the various development scenarios and the associated peak hour traffic generation estimates for the Sutter Business Center West development. Exhibit 5 presents the projected peak hour traffic conditions for each scenario at several key intersections evaluated by the EIRs. This exhibit corresponds to the Exhibits I-3 of Volume 2 of the DEIR, and shows the impacts on peak hour traffic conditions of the various development scenarios, while the rest of the South Natomas area remains as shown in the 1978 SNCP.

These exhibits revealed the following important facts regarding the current McCuen & Steele proposed developments scenario for the Sutter Business Center West development:

- o The McCuen & Steele proposal would generate 34 percent less traffic in the a.m. peak hour and 36 percent less traffic in the p.m. peak hour than the development scenario analyzed in the EIR.
- o With a few very insignificant exceptions, the projected traffic conditions of the McCuen & Steele proposal are equal to or better, in terms of saturation levels and/or service levels, than those estimated for the development scenario analyzed by the EIR.
- o When compared to the Draft 1984 SNCP development scenario, the projected traffic conditions of the McCuen & Steele proposal show saturation percentages which differ by -1 to +8 percentage points; however, no worsening of service levels occurs.
- o For all practical purposes, the projected impacts on peak hour traffic conditions of the proposed McCuen & Steele development scenario for Sutter Business Center West are similar to the traffic impacts of development of the site as proposed by the Draft 1984 SNCP. (Joseph R. Holland)

Response: See response to CBP I-5, Volume 2, comment.

Willow Creek (WC)  
Section D: Land Use

WC D-1

Comment: The Willow Creek EIR states on page 15 that MRD development "would be inconsistent with the future planned residential uses of the adjacent area" and that these impacts "would represent a significant adverse impact which could not be mitigated to a less than significant level." This finding is, of course, contrary to that reached in the Creekside Oaks and Gateway Centre EIR wherein the consultant concluded that with appropriate setbacks, MRD uses at Gateway Centre would in fact be compatible with the adjacent residential area (see page D-10 of the Creekside Oaks and Gateway Centre DEIR).. As with Gateway Centre, we submit that with appropriate setbacks MRD uses are, in fact, compatible with residential development. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: The commentor refers to a finding made in the Creekside Oaks/Gateway Centre EIR. It must be noted that the above-referenced Gateway Centre site was adjacent to planned medium high and high density residential development (predominantly multifamily and townhouse). However, the Willow Creek site is bordered by land designated for low density residential development (single family). The intensity of use generally involved with MRD development, including the potential for noise and visual intrusion associated with light manufacturing uses, and heavy truck and traffic generation, was found to be inconsistent with low density residential use. This finding in the Willow Creek EIR is not contrary to the finding made in the Creekside Oaks/Gateway Centre EIR; rather, it pertains to a different situation.

WC D-2

Comment: We submit that locating residences next to a major freeway (as the 1978 SNCP proposes) should be identified in the EIR as having a significant adverse impact on the residences. The Willow Creek EIR discusses at length the detriment of having homes adjacent to MRD uses, without at any time commenting on the far more significant, and truly unmitigable, impacts of locating homes (and their outdoor recreation areas) next to I-80. Section K of the Draft Plan EIR documents those impacts and Exhibit K-6 shows unacceptable noise contours over the entire Willow Creek site north of West El Camino Avenue. Why is this not discussed in the analysis of the Willow Creek application? (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: Comment noted. As stated on pages 63 and 64 of the DEIR, the residential and school uses proposed in the 1978 SNCP might require some consideration of noise reduction mea-

asures to ensure compatibility with predicted noise levels. A positive feature of the Willow Creek application is that the proposed land uses avoid locating sensitive uses near freeway noise.

WC D-3

Comment: The EIR consultant states that the proposed Willow Creek project is potentially inconsistent with General Plan and Central City Plan policies "to the extent that marketability of the CBD is impacted." However, the Keyser & Marston Study (see Appendix VII-5), concludes that South Natomas office development would have a minor impact on office development in the CBD. It is important to note that this statement is made based on approval of all 13 applications, which would provide up to 8.1 million sf of office space (see page VII-3), and not with reference to Willow Creek alone. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: The statement referred to by the commentor can be found on pages 17 and 18. The statements made do indeed refer to the Willow Creek project. The MRD portion of the proposed project would involve 750,000 sf of space and would include an estimated 375,000 sf of office space. This is not an inconsequential amount of office space and the potential exists that the project could attract users who would otherwise locate downtown. If this occurs, it would clearly be inconsistent with adopted plans and policies directed at supporting and retaining the role of the CBD as the financial and office area in the City. Again, the Willow Creek project was not deemed inconsistent with General and Central City Plan policies, it was found potentially inconsistent, to the extent that it impairs the marketability of Central City office space. It was also noted (on page 17) that the project is not expected to provide space for major retail or financial tenants.

Willow Creek (WC)  
Section F: Employment

WC F-1

Comment: The Willow Creek EIR on page 22 states that build-out of the Willow Creek project would result in approximately 7,603 permanent jobs, but states that if these are not provided here they would "likely occur elsewhere in the Sacramento economy." Given the fiscal benefits to the City of Sacramento of office and MRD development (see the Ralph Anderson & Associates report submitted herewith and labeled Exhibit "A"), we submit that it is highly undesirable from a City fiscal viewpoint if the bulk of new offices and commercial development locates outside the City limits. We question the statement

(contained in each of the EIRs for the 13 applications) that the jobs created by the individual applications will be provided "elsewhere." If job-producing activities are not permitted where there is a strong market demand for development, how can the EIR consultant be assured that these jobs will, in fact, be provided elsewhere within the City or within the region? We submit that the EIR consultant should consider (i) the cumulative impact of the denial of the 13 applications on the provision of new jobs within the City of Sacramento, and (ii) the cumulative financial impact on the City if the commercial and office portions of each application are denied. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: The commentor has taken issue with the concept that employment increases projected to occur in the Sacramento economy within the next 20 years would occur if the South Natomas project is not allowed to go ahead.

Developing buildings to house employment does not create permanent employment. Projections of future permanent employment in the Sacramento region are based on the availability and quality of the labor pool, the demand for services from expansion industries, the availability of transportation networks for intra- inter-state, and national/inter-national shipping of goods, and availability of developable land for both industrial and residential purposes. The Sacramento region as a whole meets many of these criteria and, for those reasons, the area is projected to have a sizable increase in employment in the next 20 years.

The projections are not affected by market demand for land development, nor are they site-specific to the South Natomas area. There is no reason to believe that lack of development at South Natomas would affect employment growth in the Sacramento region.

In addition, it should be noted that "the cumulative impact of the denial of the 13 applications" is essentially considered, as the 1978 SNCP Alternative throughout the DEIR.

Willow Creek (WC)  
Section G: Housing

WC G-1

Comment: What is the basis for the assumption on page 25 of the Willow Creek EIR that all professional workers in South Natomas would be relocated to the Sacramento area by their firms? (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: According to Keyser Marston, this was a worst case" assumption and it was identified as such. It is possible

that some new employment would be generated from the local market.

WC G-2

Comment: We wish to highlight a statement made by the EIR consultant on page 26 that "the proposed project would enhance the marketability of residentially designated land in South Natomas, North Sacramento, and other communities because of its proximity to a major employment center." We think this is a very important benefit of the Willow Creek application which should have been noted in the Summary Table under Section D, (Beneficial Impacts). (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: This impact was noted on page 26 of the DEIR, but was not included in the Summary Table as a beneficial impact because both positive and negative impacts could result from the increased marketability of residential land. For example, enhanced marketability of residential land may result in increased housing prices in South Natomas and North Sacramento.

Willow Creek (WC)  
Section I: Transportation

WC I-1

Comment: Our response to Section I (Transportation) of the Willow Creek EIR is contained in the enclosed letter from Mr. Charles Abrams of JHK & Associates (the letter is labeled Exhibit B). We ask that the EIR consultant respond to and comment on both the questions proposed to Mr. Abrams and on his responses thereto. We specifically direct attention to Mr. Abrams' comments regarding the impact on levels of service at key intersections of the amount of Willow Creek traffic allocated to the uncongested I-80/West El Camino Avenue interchange, to the inconsistencies between various of the exhibits in the Willow Creek EIR and those in the Draft Plan EIR, and to the assumed peak hour trip distribution pattern described on Exhibit I-7 of the Willow Creek EIR. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: Comment noted. Please refer to responses to comments WC I-3 through WC I-10 as follows.

WC I-2

Comment: As to inconsistencies between the tables in the Willow Creek EIR and those contained in the Draft Plan EIR, we note the following: Exhibit I-3 of the Willow Creek EIR states



that approval of Willow Creek alone will result in an a.m. peak hour D level of service at West El Camino Avenue/Truxel Road, while Exhibit S-33 in the Draft Plan EIR states that approval of all 13 applications will result in an a.m. peak hour B level of service at this same intersection. Similarly, Exhibit I-3 states that approval of Willow Creek alone will result in a p.m. peak hour D level of service at Garden Highway/Truxel Road, while Exhibit S-33 states that approval of all 13 applications will result in p.m. peak hour C level of service at this same intersection. These gross inconsistencies require explanation. (Karen O. Ahern; Diepenbrock, Wulff, Plant & Hannegan)

Response: The level of service and the degree of saturation estimates contained in Exhibit I-3 (Volume 2) and Exhibit S-33 (Volume 1) are correct and not inconsistent. In order to understand why this is the case, it is important to recognize a critical element in travel behavior: as the number of opportunities for employment and shopping increase within a community, the propensity of people within that community to travel to external points decreases. Under the 1978 SNCP Alternative, there will only be about 0.5 job available per household within the South Natomas community. The Willow Creek project will increase the total number of jobs within the community, but will not substantially change this jobs/housing ratio. Consequently, only between 10 and 20 percent of the total vehicle trips generated within the South Natomas community will have both origin and destination inside the area. This condition changes substantially under the 13 Applications Alternative in which the jobs/housing ratio for the community will increase to approximately 2.5 jobs available per household. As a result, a much higher percentage of the total vehicle trips that are generated by the community will remain within the area: depending on the purpose of the trip, over 30 percent of the vehicle trips that begin within the community may also end within the community. This causes a substantial change in the travel patterns and turning movements within the South Natomas community, and these changes are reflected in the differences that are seen when comparing Exhibit S-33 with Exhibit I-3.

#### WC I-3

Comment: Question 1: from a traffic standpoint, what is the most suitable location within the South Natomas Community Plan Area to accommodate additional development density? Answer 1: The most serious traffic problems in the South Natomas area are expected to occur on I-5 where traffic volumes are nearing the capacity of the freeway, and on the major inter-sections near the I-5 freeway ramps. These issues have been clearly documented in EIR traffic studies by CH2M Hill and in previous studies by JHK & Associates. The most favorable locations for additional developments within the area are in the vicinity of the I-80/West El Camino interchange. This location

has excellent freeway access and the interchanges have a good deal of additional capacity. (JHK & Associates, on behalf of project applicant)

Response: Whether or not a particular location is appropriate (from a traffic point of view) for more intense development depends not only existing and projected traffic flow conditions within the site vicinity, but also on the type of development that is being proposed. Any additional development that occurs in the western part of the South Natomas community is likely to add additional traffic and pressure to the I-80/West El Camino Avenue intersection; this is particularly true for the left-turn movement from I-80 onto eastbound West El Camino Avenue. Even under the 1978 SNCP Alternative, this intersection will need to accommodate nearly 450 left turning vehicles during the morning peak hour. The addition of the Willow Creek project increases this number of a.m. peak hour left turning vehicles to almost 800. As areas to the north and west of South Natomas continue to develop, additional conflicting traffic volumes that were not accounted for in the DEIR's traffic analysis can also be expected to affect this intersection. Although we have not analyzed it in great detail, the result could easily be a substantial capacity deficiency at this location.

#### WC I-4

Comment: Question 2: To the west of I-5, which properties can best accommodate nonresidential traffic use? Answer 2: The area west of I-5 is somewhat isolated by the I-80 and I-5 freeways and the Sacramento River. All external traffic must use either West El Camino or Garden Highway to gain access to the area. The EIR traffic studies have correctly identified the problems in the vicinity of the I-5 ramps, but show that there is considerable excess capacity at the I-80/West El Camino interchange. Clearly, the property in the immediate vicinity of this interchange is the most desirable from a traffic standpoint for additional office or business park development. The Willow Creek development is the preferred location from a traffic impact standpoint. (JHK & Associates)

Response: The DEIR traffic studies do not indicate that there is considerable excess capacity at the I-80/West El Camino interchange. See response to comment WC I-3 above.

#### WC I-5

Comment: Question 3: Do you concur with the assumed peak hour distribution pattern shown on Exhibit I-7 of the 1984 Community Plan EIR?

Answer 3: I have commented in the past of my concern regarding the directional distribution of traffic to and from

South Natomas. Full build-out of this area is not expected to occur for over 20 years. At that time, there will also be increased development to areas north, east, and west of the South Natomas area. Traffic will be much more evenly distributed in all directions and will not exhibit the very high concentration to and from the south that exists today.

A far more significant problem occurs, however, when these assumptions are applied unilaterally to the Willow Creek development. Approximately 35 percent of the traffic from Willow Creek has been distributed in the EIR as follows:

Northgate (to the south), 17 percent  
Arden/Garden (to the east), 12 percent  
West El Camino (to the east), 5 percent  
San Juan Road (to the east), 3 percent

While these assumptions may apply to the areas east of I-5, they are clearly not appropriate or reasonable with respect to the Willow Creek development, and should be reduced significantly. The result has been to greatly overstate the extent of the Willow Creek contribution to traffic capacity problems at the critical intersections on Truxel Road and Northgate Boulevard. (JHK & Associates)

Response: With respect to the assumed directional distribution of traffic entering and leaving the South Natomas community, the transportation analysis contained within the DEIR is based upon Year 2000 projections developed by the Sacramento Council of Governments (SACOG). We agree that there is some basis for thinking that the future development of the North and South Natomas areas may result in a more balanced directional distribution; to some degree, this has already been accounted for within these projections. We also recognize that full build-out of the North Natomas area could have a significant effect on trip distributions and on traffic volumes within the South Natomas community. However, we also note that no determination has yet been made on the North Natomas applications, and so it is inappropriate to take these proposals into account as part of this EIR. Therefore, we believe that information based on the current regional model is the best available resource for estimating future trip distribution patterns. The trip distribution assumptions applied to the Willow Creek development are consistent with these available data and projections.

#### WC I-6

Comment: Question 4: The Willow Creek EIR shows some fairly significant increases in peak hour traffic congestion at West El Camino/Truxel and West El Camino/Northgate Boulevard. Are these conclusions valid? Answer 4: This question is related to the response to question 3. I do not believe these con-

clusions are valid. For example, the EIR shows a change in the degree of saturation from 100 to 108 at West El Camino/Northgate during the a.m. peak due to the Willow Creek project. This simply cannot be valid given the distance of this intersection from the Willow Creek project.

Business park/office developments located west of I-5 will have very little, if any, impact on the areas east of the freeway. There will be few through trips, since the vast majority of external traffic will gain access to the site via the freeway interchanges. This is particularly true at Willow Creek since it is adjacent to the I-80/West El Camino interchange. The only change in traffic patterns would result from employees in these business parks who live to the east of I-5 and use West El Camino or Garden Highway to travel to this area. The traffic modeling process used in the EIR traffic studies clearly overstates these impacts with respect to Willow Creek. (JHK & Associates)

Response: See response to comment WC I-5 above. The traffic modeling effort described within the DEIR is based upon year 2000 projections for the distribution of population and employment within the Sacramento area by SACOG as part of their regional modeling activities. We believe that this represents the best available information for projecting trip distribution patterns from the Willow Creek area. Given the projected future distribution of population and employment, we do not believe it is reasonable to assume that most employees traveling to and from the Willow Creek development will reside in areas to the north and west of South Natomas.

#### WC I-7

Comment: Question 5: Has the Willow Creek EIR assigned a significant amount of project traffic to the I-80/West El Camino interchange? Answer 5: The Willow Creek EIR does not state what percentage of traffic will access the project from I-80. However, it appears from Exhibit I-7 that approximately 15 to 20 percent of the traffic has been assigned to I-80.

Due to its location adjacent to the I-80/West El Camino interchange, JHK & Associates estimates that a far greater percentage of the traffic generated by Willow Creek should be assigned to this location.

It is simply not valid to use the overall SNCP trip distribution percentages when analyzing the Willow Creek project. The fastest time path for a majority of the trips to and from Willow Creek will be via I-80. Even for many trips within the study area, the travel path selected by motorists will be I-80, using the Truxel Road and Northgate Boulevard exits from I-80. (JHK & Associates)

Response: A review of the computer model outputs indicates that between 40 and 45 percent of all inbound vehicle trips to the Willow Creek development are assumed to make use of I-80. We expect that similar results will be found for the morning outbound direction and for p.m. peak hour conditions. Thus, we believe that the modeling process has been very reasonable in its assignment of vehicular trips to the various routes.

With regard to the comments related to the assumed trip distribution percentages for the Willow Creek project, please refer to the responses to comments WC I-5 and WC I-6 above.

#### WC I-8

Comment: Question 6: What is the impact of Willow Creek on the I-80/West El Camino Avenue intersections? Answer 6: The Willow Creek EIR does not address this issue directly. The intersections of I-80 northbound ramps/West El Camino and I-80 southbound ramps/West El Camino have never been considered as critical intersections and have therefore not been evaluated in the EIR. In our previous studies of Gateway Center, these intersections were shown to operate at level of service "A". With the addition of Willow Creek, our estimates are that they will be at level of service "B" and "A", respectively. All of the traffic studies we have conducted show a significant amount of excess capacity at these locations. (JHK & Associates)

Response: See responses to comments WC I-3 and WC I-7. Although the intersection of West El Camino and I-80 was not specifically addressed within the DEIR, we believe that capacity problems could easily develop at this location. Under conditions projected within the Willow Creek DEIR, the level of service provided to left turning vehicles from I-80 onto eastbound West El Camino may be acceptable, but not to a large degree. To the extent that additional development occurs to the north and west of this intersection, the intersection could easily become capacity deficient. Therefore, we do not believe that there is a significant amount of excess capacity available at this location under any of the alternatives that were investigated.

#### WC I-9

Comment: Question 7: Please compare Exhibit I-3 in the Willow Creek EIR with Exhibit S-33 in the Community Plan EIR. Answer: Exhibit I-3 portrays intersection levels of service for the 1978 SNCP with the Willow Creek project. Exhibit S-33 shows the level of service for the 13 Applications Scenario. As you note, there are several locations where Willow Creek has more severe traffic impacts than the 13 Applications Scenario, which cannot be a reasonable conclusion. It is quite likely, therefore, that the two exhibits are based on quite different roadway

configurations, and I do not believe that they can be directly compared. You will need to ask the City staff and their consultant to clarify this issue. (JHK & Associates)

Response: See response to comment WC I-2.

WC I-10

Comment: Question 8: Does the proposed east-west connector extending from the Capitol Business Park west over the Natomas Main Canal provide substantial circulation benefits to Willow Creek? Answer 8: This connector will primarily serve trips from Capitol Business Park to the I-80/West El Camino interchange. There will not be a great deal of Willow Creek traffic using this roadway, except where there are specific destinations in the Capitol Business Park.

To the extent that this connection improves the capacity at the West El Camino/West Gateway Oaks intersection, it will be to the benefit of all property owners in the area. (JHK & Associates)

Response: Comment acknowledged. We concur with these general conclusions.

### Section III

#### ERRATA

##### Volume 1

Page G-4, paragraph 5. The third sentence should be amended to read as follows: "With this factor, a "worst case" demand for approximately 20,435 housing units would be created with implementation of the Draft Plan."

Page G-5, paragraph 1. First full sentence should read as follows: "Under the 'worst case' scenario housing demands generated by new employment under the Draft Plan would account for approximately 12 percent of the county's housing demand."

Pages I-11 and I-12, Exhibits I-11 and I-12 should be replaced with the following exhibits labeled "Revised Exhibit I-11" and "Revised Exhibit I-12."

Page L-2, refer to SMUD's revised figure which follows.

Page L-5, refer to SMUD's revised figure which follows.

Page N-11, paragraph 4. Text makes reference to Exhibit N-?. Should be N-14.

Page Q-1, paragraph 3. The second sentence should be amended as follows: "The southwest corner of the Community Plan area which is proposed for low density residential development is, ..."

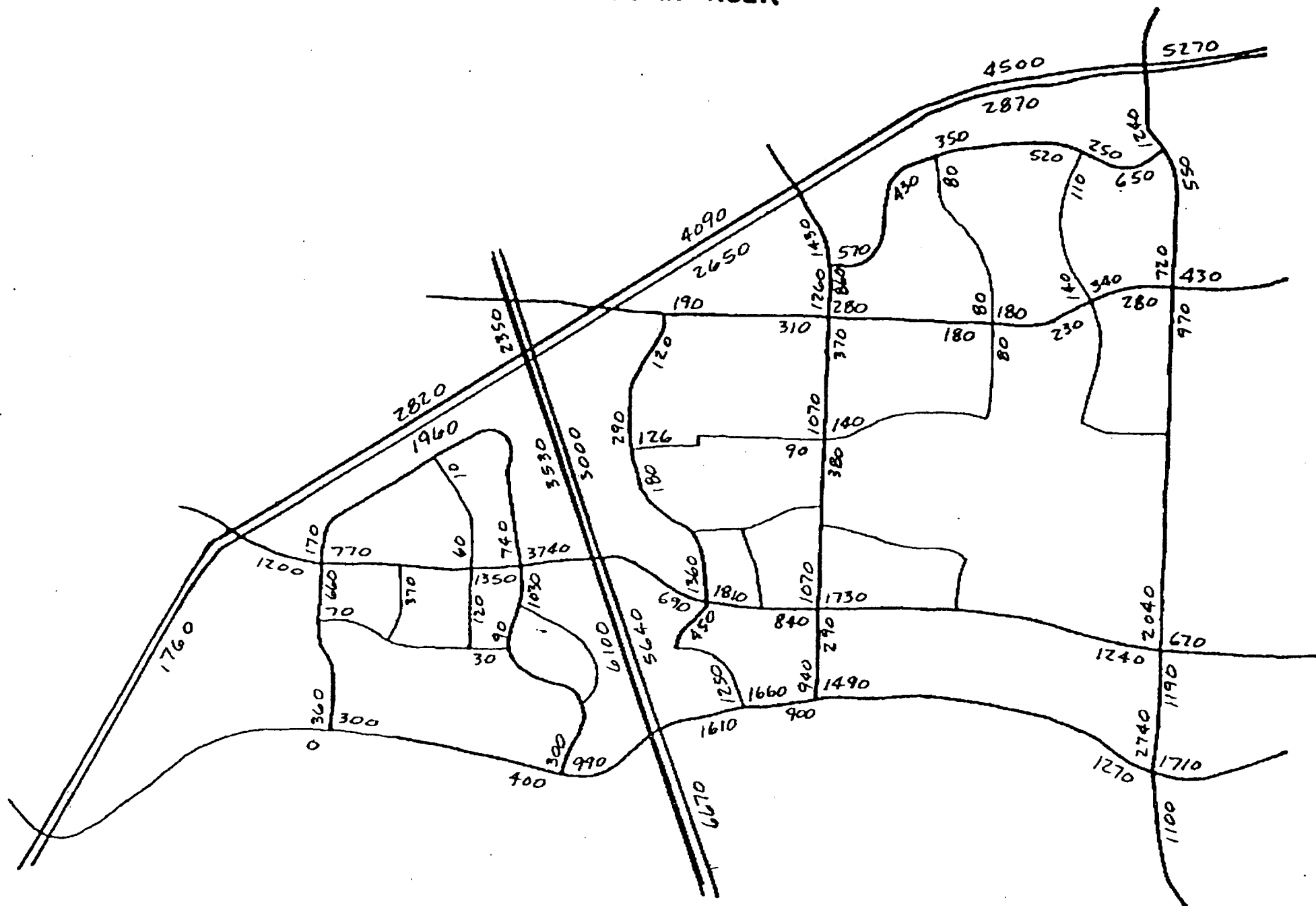
Page S-1, paragraph 3. The second sentence should read as follows: "The individual impacts of the remaining 11 applications are examined in greater detail in Volume 2."

Page T-2, second full paragraph. The last sentence should read as follows: "An evaluation of the cumulative impacts of the North Natomas development proposals and the 13 Applications Alternative is presented in the text below."

Page V-1, the following reference should be added to the Bibliography:

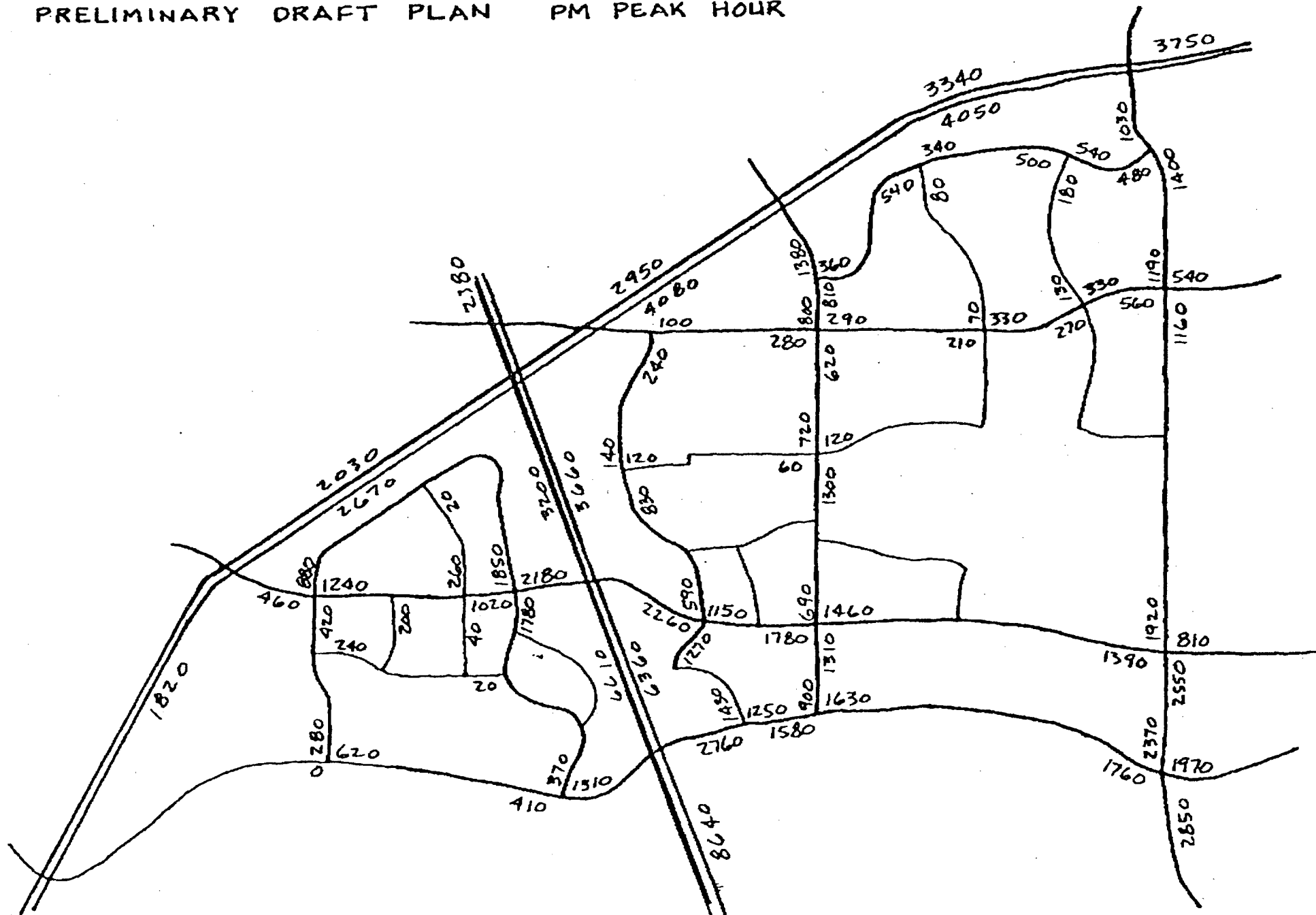
California Air Resources Board. 1982. California Ambient Air Quality Standards For Carbon Monoxide (Sea Level), California Air Resources Board, Sacramento, California.

REVISED EXHIBIT I-11  
PRELIMINARY DRAFT PLAN AM PEAK HOUR





PRELIMINARY DRAFT PLAN PM PEAK HOUR



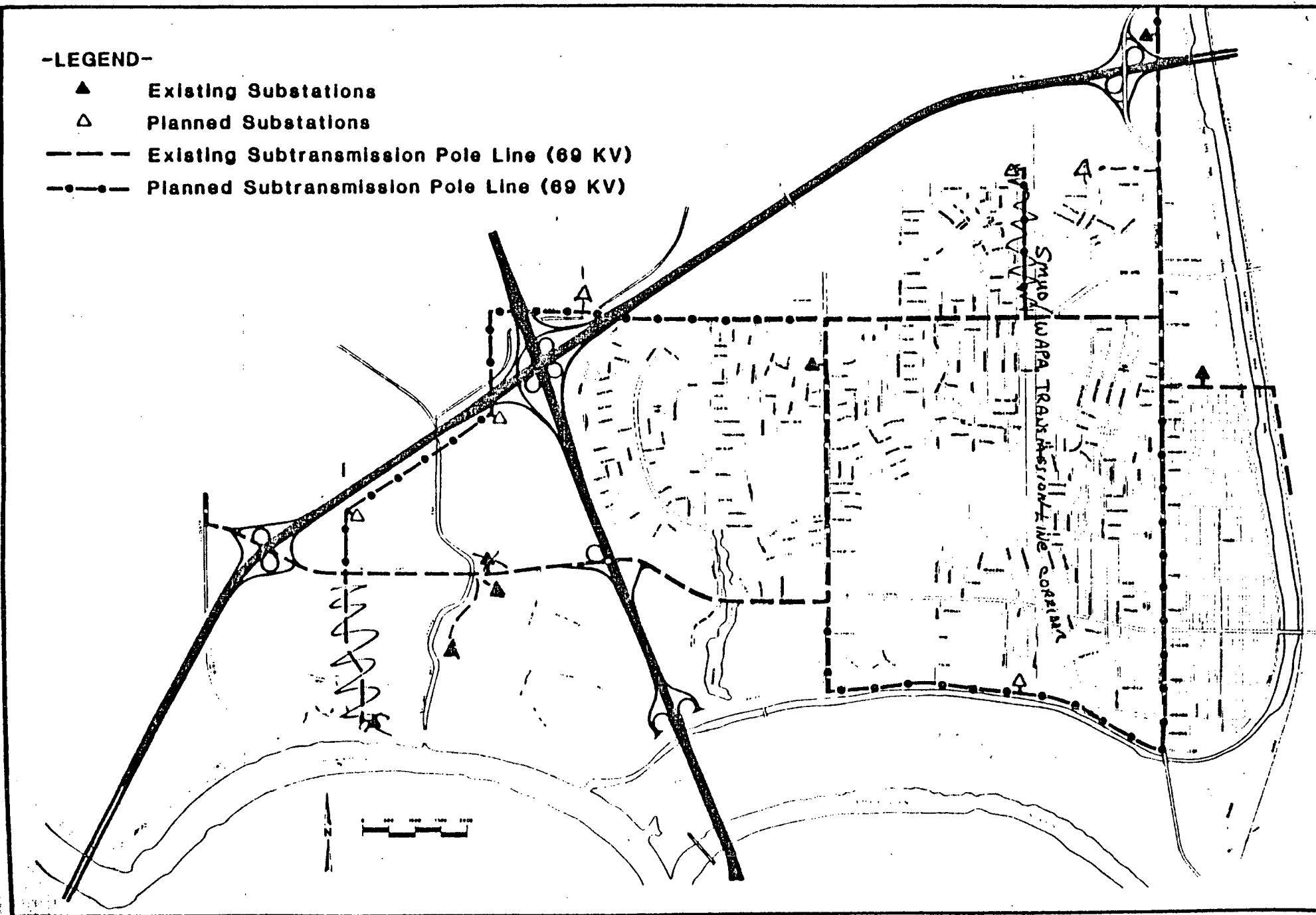
**-LEGEND-**

▲ Existing Substations

△ Planned Substations

— Existing Subtransmission Pole Line (69 KV)

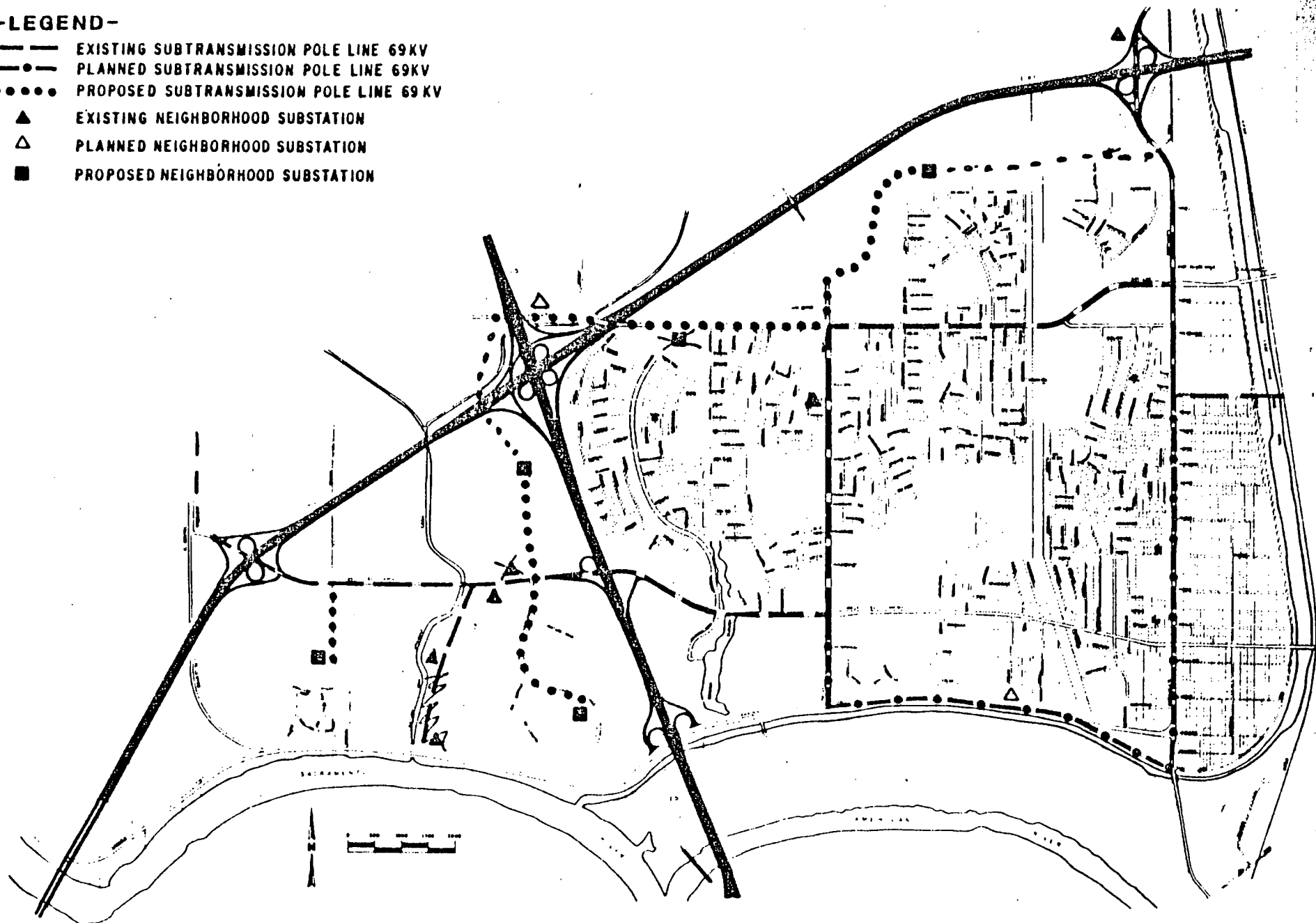
-.-.- Planned Subtransmission Pole Line (69 KV)



**EXHIBIT L-2. SMUD EXISTING AND PLANNED SOUTH NATOMAS FACILITIES**

**-LEGEND-**

- EXISTING SUBTRANSMISSION POLE LINE 69KV
- - - PLANNED SUBTRANSMISSION POLE LINE 69KV
- ..... PROPOSED SUBTRANSMISSION POLE LINE 69KV
- ▲ EXISTING NEIGHBORHOOD SUBSTATION
- △ PLANNED NEIGHBORHOOD SUBSTATION
- PROPOSED NEIGHBORHOOD SUBSTATION



**EXHIBIT L-5. DRAFT 1984 SNCP GENERALIZED DISTRIBUTION SYSTEM AND SUBSTATION SITING PLAN**

Volume 2

CAPITOL BUSINESS PARK

Page 28, paragraph 2. Third sentence should be amended as follows: "With this factor, a 'worst case' demand for approximately 6,509 housing units would be created by the proposed two projects."

Page 46, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an unacceptable LOS E with a 133 percent degree of saturation as follows:

CAPITOL BUSINESS PARK ALTERNATIVE P.M. PEAK HOUR		
<u>Intersection</u>	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	E <sup>1</sup>	133

Page 47, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +55, as shown:

CHANGE FROM 1978 PLAN ALTERNATIVE		
<u>Intersection</u>	<u>A.M. PEAK</u>	<u>P.M. PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue	-1	+58

CAPITOL/80 PROPERTIES

Page 48, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 79 percent degree of saturation as follows:

CAPITOL/80 PROPERTIES ALTERNATIVE P.M. PEAK HOUR		
<u>Intersection</u>	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D	79

Also, line 11 (Garden Highway/Truxel Road). The table entry for Capitol/80 Properties Alternative for the p.m. peak hour is an LOS D. This should have a superscript one: D<sup>1</sup>. (The degree of saturation is 85 percent).

Page 49, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +1, as shown:

<u>Intersection</u>	CHANGE FROM 1978 PLAN ALTERNATIVE	
	A.M.	P.M.
	PEAK	PEAK
East Gateway Oaks Drive/West El Camino Avenue <sup>2</sup>	-1	+1

#### COMMUNITY HOSPITAL

Page 43, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 78 percent degree of saturation as follows:

<u>Intersection</u>	COMMUNITY HOSPITAL ALTERNATIVE	
	P.M. PEAK HOUR	
	LOS	DEGREE OF SATURATION
East Gateway Oaks Drive/West El Camino Avenue	D	78

Page 44, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a 0, as shown:

<u>Intersection</u>	CHANGE FROM 1978 PLAN ALTERNATIVE	
	A.M.	P.M.
	PEAK	PEAK
East Gateway Oaks Drive/West El Camino Avenue <sup>2</sup>	-1	0

#### COOK COMPANY NORTHGATE

Page 46, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 78 percent degree of saturation as follows:

<u>Intersection</u>	COOK COMPANY NORTHGATE	
	P.M. PEAK HOUR	
	LOS	DEGREE OF SATURATION
East Gateway Oaks Drive/West El Camino Avenue	D	78

Page 47, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a 0, as shown:

<u>Intersection</u>	<u>CHANGE FROM 1978 PLAN ALTERNATIVE</u>	
	<u>A.M.</u>	<u>P.M.</u>
	<u>PEAK</u>	<u>PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue <sup>2</sup>	-1	0

#### FONG RANCH

Page 23, paragraph 3. First sentence should read as follows: "In addition to the direct on-site population generated, project implementation would result in increased . . ."

Page 52, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 79 percent degree of saturation as follows:

<u>Intersection</u>	<u>FONG RANCH ALTERNATIVE</u>	
	<u>P.M. PEAK HOUR</u>	<u>DEGREE OF</u>
	<u>LOS</u>	<u>SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D	79

Page 53, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +1, as shown:

<u>Intersection</u>	<u>CHANGE FROM 1978 PLAN ALTERNATIVE</u>	
	<u>A.M.</u>	<u>P.M.</u>
	<u>PEAK</u>	<u>PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue <sup>2</sup>	-1	+1

#### MERCY NATOMAS HOSPITAL

Page 49, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 79 percent degree of saturation as follows:

MERCY NATOMAS  
HOSPITAL  
ALTERNATIVE  
P.M. PEAK HOUR

<u>Intersection</u>	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D	79

Page 49, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +1, as shown:

<u>Intersection</u>	<u>CHANGE FROM 1978 PLAN ALTERNATIVE</u>	
	<u>A.M. PEAK</u>	<u>P.M. PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue	+7	+1

NATOMAS CORPORATE CENTER

Page 3, under "size of buildings" - should be amended to read: "9,000 sf to 110,000.

Page 3, under "site coverage," the entry should be amended to read as follows:

<u>Site Coverage</u>	<u>Undetermined</u>
Building Coverage	25 percent
Landscaped Area	undetermined
Surfaced Area	100 percent

Page 13, paragraph 2. The following sentence should be added to the paragraph beginning with Project Site: "In addition, dedication of an additional 2.7 acres in the Bannon Slough preserve area is consistent with the Draft 1984 SNCP.

Page 13, paragraph 5. Last sentence should be amended to read as follows: ". . . the net density would be increased 10 percent from 15.082 sf per net acre to 16,622 sf per net acre."

Page 42, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 78 percent degree of saturation for the project alternative as follows:

NATOMAS CORPORATE CENTER ALTERNATIVE		
<u>P.M. PEAK HOUR</u>		
<u>Intersection</u>	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D	78

Page 43, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a 0, as shown:

CHANGE FROM 1978 PLAN ALTERNATIVE		
<u>Intersection</u>	<u>A.M. PEAK</u>	<u>P.M. PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue <sup>2</sup>	-1	0

#### PARK EL CAMINO

Page 42, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an unacceptable LOS D with an 83 percent degree of saturation as follows:

PARK EL CAMINO ALTERNATIVE		
<u>P.M. PEAK HOUR</u>		
<u>Intersection</u>	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D <sup>1</sup>	83

Page 43, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +5, as shown:

CHANGE FROM 1978 PLAN ALTERNATIVE		
<u>Intersection</u>	<u>A.M. PEAK</u>	<u>P.M. PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue	-2	+5

#### RIVER VIEW OAKS

Page 24, paragraph 2. First sentence should be amended as follows: "Build-out of the proposed projects would . . ."



Page 46, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 78 percent degree of saturation as follows:

<u>Intersection</u>	RIVER VIEW OAKS ALTERNATIVE	
	P.M. PEAK HOUR	
	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D	78

Page 47, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +2, as shown:

<u>Intersection</u>	CHANGE FROM 1978 PLAN ALTERNATIVE	
	A.M.	P.M.
	<u>PEAK</u>	<u>PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue	0	+2

#### SAMMIS TECHNOLOGY CENTER

Page 4, Exhibit I-3, line 3. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection condition for the p.m. peak hour should be an acceptable LOS D with a 79 percent degree of saturation as follows:

<u>Intersection</u>	SAMMIS TECHNOLOGY CENTER ALTERNATIVE	
	P.M. PEAK HOUR	
	<u>LOS</u>	<u>DEGREE OF SATURATION</u>
East Gateway Oaks Drive/West El Camino Avenue	D	79

Page 4, Exhibit I-4, line 1. The table entry for the East Gateway Oaks Drive/West El Camino Avenue intersection p.m. peak hour change from the 1978 SNCP Alternative should be a +1, as shown:

<u>Intersection</u>	CHANGE FROM 1978 PLAN ALTERNATIVE	
	A.M.	P.M.
	<u>PEAK</u>	<u>PEAK</u>
East Gateway Oaks Drive/West El Camino Avenue <sup>2</sup>	+1	+1

APPENDIX VI

Page VI-17, Appendix Table B-8 should be replaced with a revised Table B-8, shown on the following page.

SUMMARY OF REVENUES -- "1983 APPLICATION" (\$000's)

APPENDIX TABLE B-8

	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6	YEAR 7	YEAR 8	YEAR 9	YEAR 10
PROPERTY TAX	\$278	\$555	\$840	\$1,141	\$1,425	\$1,708	\$1,986	\$2,246	\$2,427	\$2,480
SALES TAX	48	66	114	240	288	304	354	570	618	676
BUSINESS LICENSE	21	42	63	84	105	127	148	170	185	185
UTILITIES	160	319	482	652	815	977	1,137	1,285	1,396	1,438
MISCELLANEOUS REVENUE	257	514	776	1,046	1,308	1,570	1,828	2,077	2,269	2,353
T O T A L	\$764	\$1,495	\$2,275	\$3,162	\$3,942	\$4,668	\$5,453	\$6,147	\$6,895	\$7,091
CUMULATIVE TOTAL	\$764	\$2,259	\$4,535	\$7,696	\$11,638	\$16,327	\$21,780	\$28,127	\$35,022	\$42,113

	YEAR 11	YEAR 12	YEAR 13	YEAR 14	YEAR 15	YEAR 16	YEAR 17	YEAR 18	YEAR 19	YEAR 20	TOTAL
PROPERTY TAX	\$2,535	\$2,587	\$2,640	\$2,693	\$2,747	\$2,797	\$2,846	\$2,898	\$2,947	\$2,841	\$2,849
SALES TAX	654	702	720	738	786	786	786	816	816	1,765	\$1,763
BUSINESS LICENSE	185	185	185	185	185	185	185	185	185	185	185
UTILITIES	1,475	1,521	1,567	1,604	1,647	1,687	1,727	1,768	1,809	2,176	2,176
MISCELLANEOUS REVENUE	2,427	2,521	2,605	2,689	2,743	2,789	2,835	2,883	2,930	3,352	3,352
T O T A L	\$7,087	\$7,517	\$7,713	\$7,909	\$8,108	\$8,244	\$8,360	\$8,550	\$8,686	\$11,116	\$11,115
CUMULATIVE TOTAL	\$49,431	\$56,917	\$64,630	\$72,539	\$80,647	\$88,891	\$97,271	\$105,821	\$114,507	\$125,622	

SOURCE: KEYSER MARSTON ASSOCIATES, INC.

Section IV

REPRODUCTION OF COMMENT LETTERS RECEIVED

## OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET  
SACRAMENTO, CA 95814

December 17, 1984

Diana Parker  
City of Sacramento  
927 10th Street, Room 300  
Sacramento, CA. 95814

Subject: South Natomas Community Plan and II Projects, SCH #84010904

Dear Ms. Parker:

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

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

In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (CEQA Guidelines Section 15091 and 15093).

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

Sincerely,

  
John B. Ohanian  
Chief Deputy Director
cc: Resources Agency  
attachment

CITY PLANNING DEPARTMENT

NOV 18 1984

RECEIVED

## DEPARTMENT OF TRANSPORTATION

## DIVISION OF AERONAUTICS

1120 "N" STREET  
SACRAMENTO, CA 95814  
(916) 322-3090

CITY PLANNING DEPARTMENT

NOV 19 1984

RECEIVED

November 14, 1984

Ms. Diana Parker  
Associate Planner  
City of Sacramento  
City Planning Department  
927 Tenth Street, Suite 300  
Sacramento, CA 95814

Dear Ms. Parker:

Draft Environmental Impact Report for South Natomas  
Community Plan Update and Related Projects and  
Draft South Natomas Community Plan Revision  
SCH #84010904

The Department of Transportation, Division of Aeronautics, has reviewed the above-referenced documents with respect to those areas germane to its statutory responsibilities, i.e., airport noise and safety conditions. Due to the proximity of the Natomas Airport to several of the project sites, the impact of noise and safety from the airport on the project and the project's impact on an airport itself should be addressed.

Thank you for the opportunity of reviewing and commenting on this proposal.

Sincerely,

JACK D. KEMMERLY, Chief  
Division of Aeronautics
  
Earl A. Tucker, Chief  
Air Transportation

A-1

D-1

114

## Memorandum

To : 1. Gordon F. Snow, Project Coordinator  
Resources Agency

2. Diana Parker  
City of Sacramento  
Planning Department  
927 10th Street, Room 300  
Sacramento, CA 95814

From : Department of Fish and Game

Date: December 6, 1984

RECEIVED  
DEC 12 1984  
State Clearinghouse

Subject: Draft Environmental Impact Report (DEIR) for the South Natomas  
Community Plan and Eleven Projects, Sacramento County (SCH  
84010904)

The Department of Fish and Game has reviewed the DEIR for the 1984 South Natomas Community Plan Update and related projects. The plan is an update of a 1978 plan which covers approximately 4,900 acres. The study area is bounded by Interstate 80 on the west and north, the Natomas East Main Drainage Canal on the east, and both the American River Parkway and the Sacramento River on the south.

The Department recommends the mitigation measures proposed on Page 0-11, Volume I, become part of any development projects within the planning areas. These include use of native vegetation, landscaping in nonresidential areas, reduction of habitat disturbances along Bannon Slough and the Natomas Main Drainage Canal, and permitting young oaks to mature in those areas dedicated as oak woodland. The nondeveloped zone along each side of the slough and canal should be increased to 100 feet to allow the establishment of herbaceous vegetation. Herbaceous vegetation provides food for many seed-eating species of wildlife, which in turn provide food for raptors found in the area, including the rare Swainson's hawk.

If the Department can be of further assistance, please contact Paul T. Jensen, Regional Manager, Region 2, 1701 Nimbus Road, Rancho Cordova, CA 95670, telephone (916) 355-7020.

*Jack C. Parnell*  
Jack C. Parnell  
Director

## Memorandum

To : 1. Gordon F. Snow, Ph.D., Assistant  
Secretary for Resources

2. City of Sacramento  
Department of Planning  
and Development  
Planning Division  
927 - 10th Street  
Sacramento, CA 95814

From : Department of Water Resources

Date : NOV. 8 1984

File No.:

Subject: SCH 84010904 - Draft  
EIR, South Natomas  
Community Plan and  
Eleven Projects

RECEIVED  
DEC 12 1984  
State Clearinghouse

We have reviewed the subject South Natomas Community Plan which was transmitted by the State Clearinghouse Notice of Completion, dated November 3, 1984, and have the following comments and recommendations:

In Volume I, Section N, Hydrology, Drainage and Water Quality, the report identifies the existing reoccurring problem of seepage. This section should be expanded to include the "Seepage Evaluation Curves" found on Plate 30 of the Department of Water Resources' Bulletin 125, "Sacramento Valley Seepage Investigation, August 1967". These curves show the number of days of flow duration that will create seepage problems. Frequency of occurrence curves should also be included to better aid in planning for use of the areas prone to seepage and allow for better site preparation as mentioned in Volume II for the River View Oaks and Willow Creek developments.

This information is necessary to allow evaluation of a potential seepage problem similar to that which occurs almost every winter in residential areas of the Pocket area of South Sacramento when the Sacramento River has high flows of long duration. The curves in Bulletin 125 can be used to estimate the relationship between duration of flow, height, and potential seepage.

To present the seepage data, Exhibit N-2 (seepage map) probably should also be superimposed on both Exhibit B-6 (Draft 1984 SNCP) in Volume I and on Preface Exhibit 1 in Volume II.

For further information you may wish to contact Joe Ferreira of my staff at (916) 445-2952. Thank you for the opportunity to review and comment.

*James U. McDaniel*  
James U. McDaniel  
Chief, Central District

## Memorandum

To : Terry Roberts  
STATE CLEARINGHOUSE  
1400 Tenth Street, Room 121

Date : December 10, 1984

Subject: South Natomas  
Community Plan  
& Related Projects  
SCH #84010904

From : ENVIRONMENTAL HEALTH DIVISION  
714 P Street, Room 600  
322-2308

RECEIVED  
DEC 12 1984  
State Clearinghouse

The Department has reviewed the subject environmental document and offers the following comments.

The Draft EIR points out correctly that several residential areas are expected to be exposed to high levels of traffic noise, and that these are to be considered significant impacts (page K-5). Several general mitigation measures are proposed, but responsibility for their implementation has not been specified. Who is responsible and what technique will be used to assure that appropriate mitigation measures will be incorporated into project designs?

If you have any questions or need further information concerning these comments, please contact Dr. Jerome Lukas of the Noise Control Program, Office of Local Environmental Health Programs, at 2151 Berkeley Way, Room 613, Berkeley, CA 94704, 415/540-2665.

*Stuart E. Richardson, Jr.*  
fcl Stuart E. Richardson, Jr., R.S., Chief  
Office of Local Environmental Health Programs

K-1

## Memorandum

To : Executive Officer  
State Clearinghouse  
1400 Tenth Street  
Sacramento, CA 95814

Date : December 13, 1984

File : 03-Sac-5,80  
South Natomas  
Community Plan  
Revision  
SCH 84010904

From : DEPARTMENT OF TRANSPORTATION  
District 3 - Environmental Branch

Subject :

Caltrans, District 3, has reviewed the draft EIR for the South Natomas Community Plan update and 11 separate development projects in the area.

We are concerned about the significant impacts to State highway facilities, as identified in the document. Impacts for which there are no available mitigation measures are anticipated at the following locations: West El Camino Avenue/northbound Interstate 5 off-ramp, Garden Highway/northbound Interstate 5 ramps, and Interstate 5 mainline across the American River. Proposed development in the North Natomas will further compound these impacts. It is likely that ramp metering will be required.

I-1

The City should also consider alternative land use scenarios to reduce the impacts to State highways. In some cases capacity deficiencies cannot be mitigated by roadway improvements. However, one possible improvement that could be considered is the extension of Truxel Road across the American River as an alternative route to Interstate 5.

I-2

The document identifies TSM actions as a means to alleviate capacity deficiencies while maintaining the proposed land use intensity. Since a 15 percent trip reduction rate has already been assumed for TSM, it is unlikely that even "severe and restrictive" TSM actions will achieve additional, significant reductions.

I-3

The document assumes certain State highway improvements to be in place by the year 2000. The majority of these improvements will likely need to be funded by non-State sources.

I-4

If there are any questions on these comments, please contact Jeannie Baker at the above address, or telephone (916) 741-4498.

W. R. GREEN  
District Director of Transportation

*R. Rogers*  
By  
R. Rogers  
Deputy District Director  
Planning and Public Transportation

RECEIVED  
DEC 17 1984  
State Clearinghouse

## AIR RESOURCES BOARD

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



Date: December 17, 1984

To: 1) John Ohanian, Director  
State Clearinghouse  
Office of Permit Assistance  
1400-10th Street  
Sacramento, CA 95814  
IMS A-8

2) Dianna Parker  
City of Sacramento  
927 10th Street, Room 300  
Sacramento, CA 95814

Attention: Peggy Lynn Osborn

Thru: *for* *James D. Boyd*  
Deputy Secretary of Environmental Affairs

From: *James D. Boyd*  
Executive Officer

Subject: South Natomas Community Plan Update and Related Projects, SCH No. 84010904

We have reviewed the air quality section of the draft environmental impact report (DEIR) on the proposed South Natomas Community Plan Update and Related Projects. We are concerned that the air quality analysis (Section J) does not fully identify the regional impacts on future ozone levels in the Sacramento Valley Air Basin which can be anticipated from the alternative development plans.

#### Air Quality Impacts

We performed a screening analysis of the impacts using URBEMIS #1, a land use-emissions model developed by the ARB staff, using the land use assumptions of the four alternatives identified in Exhibit D-20. The results are as follows:

Vehicular Emissions from Four Land Use Assumptions  
Assuming Project Buildout in the Year 2000 of the  
South Natomas Community Plan (SNCP)

	Daily Vehicle Trips	Carbon Monoxide (t/d)	Reactive Hydrocarbons (t/d)	Nitrogen Oxides (t/d)
Draft 1984 SNCP	433,557	37.91	4.20	2.08
1978 SNCP with Rezoning of 13 Properties	506,254	40.38	4.78	2.40
1978 SNCP Alternative	363,169	29.81	3.42	1.67
No-Project Alternative (current development)	95,655	7.33	0.86	0.41

Mr. Ohanian  
Ms. Parker

-2-

December 17, 1984  
SCH No. 84010904

#### Consistency with State Implementation Plan (SIP)

Population and employment growth assumed in the 1978 SNCP Alternative was included in the assumptions of the 1982 State Implementation Plan (SIP) revision of the Air Quality Plan (AQP) for the Sacramento Valley Air Basin. The 1982 SIP projected a shortfall of 22.15 tons per day in the emissions of reactive hydrocarbons which would have been necessary to attain the national ambient air quality standard (NAAQS) for ozone by 1987 as required by the Clean Air Act. The proposed rezonings could increase the reactive hydrocarbon emissions shortfall by an estimated 0.78 to 1.36 tons per day unless the vehicular trip generation rate is reduced through mitigation measures.

#### Mitigation Measures

The DEIR proposes reducing work-related trips by future employees working in South Natomas by 15 percent as required by the City of Sacramento Transportation Systems Management Plan. We suggest the specific methods by which vehicle trips and emissions from future site development will be mitigated be included in the final environmental impact report (FEIR). Given current financial constraints, it cannot be assumed that transit service, bikeways, light rail access, or rideshare matching will be available to future residents and employees without participation by the property owners in meeting the construction and operating costs of providing these services. The concept of transferring development rights might provide a useful approach to achieving equity among landowners in developing a comprehensive plan for the total Natomas area.

We would welcome the opportunity to work with City staff to strengthen these portions of the FEIR. If you have questions concerning these comments, please contact Donna Lott of my staff at (916) 322-7047.

cc: Gary Stonehouse, SACOG  
Norm Coveil, Sacramento County APCD  
Les Ornales, Sacramento Rideshare  
Hilda Chandler, Sacramento Regional Transit  
Wendy Edson, EPA

J-2

I-5

O-2

J-1

117



## NATIVE AMERICAN HERITAGE COMMISSION

915 Capitol Mall, Room 288  
Sacramento, California 95814

(916) 322-7791

## CITY PLANNING DEPARTMENT

NOV 13 1984

RECEIVED

November 9 1984

Diana Parker  
City Planning Department  
927 Tenth Street Suite 300  
Sacramento, CA 95814

RE: SOUTH NATOMAS COMMUNITY PLAN DRAFT EIR

Dear Ms. Parker:

Recently I had the opportunity to review your draft EIR for this project.

Since the southwest corner of the project is within a sensitive area (Ca-Sac-164), the Commission recommends that a cultural resource survey be conducted in this area prior to development.

We would also recommend that a Native American be present as an observer through all phases of the survey, and if Native American artifacts or remains are located in this area that a Native American observer be present during the grading phase of this project. If requested, the Commission will provide you with a list of appropriate Native Americans.

As I indicated previously, should Native American remains be encountered we would request that the County Coroner's Office be contacted pursuant to Section 7050.5 of the Health and Safety Code.

If you have any questions or comments, please contact the Commission.

Very Truly Yours,

*[Signature]*  
John D. Smith  
Executive Assistant

JDS/b.g.  
cc:file

## CITY PLANNING DEPARTMENT

NOV 16 1984

RECEIVED

## ACKNOWLEDGEMENT

DATE: November 15, 1984

TO: Diana Parker, Associate Planner  
City of Sacramento  
Planning Department  
927 Tenth Street, Suite 300  
Sacramento, CA 95814

FROM: June Holt, Associate Administrative Assistant

RE: Draft South Natomas Community Plan and Draft EIRs on the  
Plan and 11 Projects

We have received from your agency notification of the project proposal referenced above. In accordance with Areawide Clearinghouse procedures, we have forwarded your proposal to affected local jurisdictions and agencies for review and comment.

Your project will not be reviewed by the Council or its committees.

Review entities have been asked to forward their comments to you by December 6, 1984.

In the meantime, if you have any questions, please call me.

JMH:cgl



Sacramento Area  
Council of Governments  
Suite 300, 800 'H' Street  
Sacramento, California 95814  
(916) 441-5930  
Mailing Address:  
P.O. Box 808  
Sacramento, California 95804

## Directors

RICHARD M. WITHROW  
(Chairman)

Supervisor  
Sutter County

RONALD A. HAEDICKE  
(Vice Chairman)  
Councilman, City of  
Marysville

CHARLES D. CENTER  
Supervisor  
Yuba County

GEORGE P. DeMARS  
Supervisor  
Yolo County

LAWRENCE MARK  
Councilman, City of  
Yuba City

ROGER S. MOSIER  
Councilman, City of  
Winters

LYNN ROBE  
Councilwoman, City of  
Sacramento

RICHARD ROCCUCCI  
Councilman, City of  
Roseville

FRED V. SCHEIDEGGER  
Councilman, City of  
Folsom

TED SHEEDY  
Supervisor  
Sacramento County

JAMES E. WILLIAMS  
(Executive Director)

## Members

City of Lincoln  
City of Rocklin  
City of Roseville  
Sacramento County  
City of Folsom  
City of Galt  
City of Isleton  
City of Sacramento  
Sutter County  
City of Live Oak  
City of Yuba City  
Yolo County  
City of Davis  
City of Winters  
City of Woodland  
Yuba County  
City of Marysville  
City of Wheatland

Q-1

A-2

118



# Regional Transit

P.O. BOX 2110 • 1400 29TH STREET • SACRAMENTO, CA 95810-2110 • (916) 321-2800

CITY PLANNING DEPARTMENT

DEC 14 1984

RECEIVED

December 13, 1984

Diana Parker  
City Planning Department  
927 Tenth Street  
Suite 300  
Sacramento, CA 95814

Re: Draft South Natomas Community Plan and EIR

Dear Diana:

Regional Transit (RT) staff has reviewed the Draft Plan and EIR for South Natomas. Staff comments are provided below. It is anticipated that the RT Board of Directors will confirm the comments in January, 1985.

Since South Natomas was designed as a transit-oriented community, it should continue to embrace transit considerations and fully reflect these in the Draft 1984 Plan's concept. In that regard, RT supports the implementation policies of the Plan (p. 43) and the mitigation measures of the Draft EIR (p. I-16-17). These include increasing public and/or private subsidies to RT, recognizing transit needs in project design, providing shelters and turnouts as needed, and providing transit centers as needed.

Specifically, with respect to increasing subsidies, RT staff is developing a cost estimation concept and formula in which new developments would "buy-in" to the RT bus system based upon the proportion of trips generated by any given project as compared to the total number of trips in the Sacramento region. Each development would provide funds for capital and operating costs utilizing RT's capital investment and operating budget at the time of project approval as the basis for the "buy-in" estimates. This approach offers an equitable and simple way for developments to provide for the increased demands they place upon the transit system, which cannot be met unless additional resources are made available.

Parker, Diana

-2-

December 13, 1984

Commenting on the policies and mitigation measures included in the Draft Plan and EIR, RT would like to suggest two others related to light rail transit (LRT) development:

- That right-of-way for the proposed Natomas/Airport line be provided.
- That developers be required to contribute the needed local match for LRT development costs, based on the percentage of estimated future usage.

In developing transit service proposals for North Natomas, RT staff has examined, preliminarily, some LRT alignments through both South and North Natomas.

One alignment, proposed by the North Natomas study consultant, runs from Northgate Blvd. to Metro Airport via Del Paso Rd. and Interstate 5. RT staff considers that at least one other alignment should be explored. An alternate alignment, which the District sees as meriting attention, runs from Northgate Blvd. to Metro Airport via Garden Highway, Truxel Rd., Del Paso Rd. and Interstate 5. This Truxel alignment appears to offer much better access opportunities in South Natomas as well as operating through areas proposed for more intensive land uses in North Natomas. The operational success of the system will be enhanced by having the improved access and major trip attractors along the Truxel route.

It is suggested that both alignments be shown as alternatives in the community plan. Additionally, right-of-way for the track and potential stations should be dedicated as development projects are approved along the alignments. This is particularly important in South Natomas since the community is more developed. From the experiences of developing guideway projects in Sacramento and elsewhere, it has become apparent that unless future right-of-way can be preserved, the feasibility of ever developing a light rail line will be significantly diminished.

In regard to developers contributing the local share of LRT development costs, RT views this as imperative. Recent changes in state and federal funding regulations for new guideway projects require a significant local match of funds for project approval, even for the most meritorious proposals. Since local public funds are already stretched to their limits, and there is very low likelihood of obtaining 2/3 voter approval for a transit sales tax, RT urges that new projects be required to participate in the local share of LRT development costs.


Parker, Diana

-3-

December 13, 1984

Please contact me or Hinda Chandler of my staff if there are any questions on these comments.

Sincerely,



Gene Moir  
Planning Manager

cc: M. Wiley, Executive Assistant  
J. Ketelsen, Chief Legal Counsel  
H. Chandler, Associate Planner

COUNTY OF SACRAMENTO  
DEPARTMENT OF AIRPORTS

6900 AIRPORT BOULEVARD  
SACRAMENTO, CALIFORNIA 95837  
(916) 929-5411



DIRECTOR OF AIRPORTS  
George W. McLaughlin

CITY PLANNING DEPARTMENT

DEC 3 - 1984

RECEIVED

November 27, 1984

Mr. Cliff Carstens  
Sacramento City Planning Department  
927 10th Street, Suite 300  
Sacramento, CA 95814

SUBJECT: SOUTH NATOMAS COMMUNITY PLAN REVISION - DRAFT PLAN  
SOUTH NATOMAS COMMUNITY PLAN UPDATE - DEIR

Dear Mr. Carstens:

The Sacramento County Department of Airports has reviewed the subject Draft Community Plan and Draft Environmental Impact Report and offer the following comments for your consideration:

1. Implementation of the proposed plan would not appear to violate any height or safety requirements associated with the operation of Sacramento Metro Airport. D-3
2. Proposed developments should not experience adverse aircraft noise exposure pursuant to the criteria established by Title 21, Chapter 2.5, Sub-chapter 6 of the California Administration Code (Airport Noise Standards). However, due to the frequency of Metro Airport Runway 16 departures and Runway 34 arrivals, future residents of South Natomas may eventually complain about the frequency of aircraft overflights and perceive a higher level of aircraft noise than actually exists due to the visual observation of these overflights. Case history supporting this contention is documented by noise complaints received by the Department of Airports from the current residential community in South Natomas. D-4

Discussion

Average aircraft departure performance (large commercial jets) from Runway 16 would normally place aircraft approximately 3,000 feet above ground level at the centroid of proposed development. Aircraft arrivals to Runway 34 will generally vary from 1,800 ft. to 2,500 ft. Commercial jet overflight frequency ranges from approximately 10 per hour during peak periods to about 2 per hour during off-peak periods. The anticipated growth in air transportation will intensify overflight frequency and possibly shift peak periods of operation. D-5

Based on these overflight considerations, the presence of aircraft over the South Natomas population should be brought to the attention of future homeowners and residences. This notification could be secured through an aviation-noise easement granted to Sacramento County (Department of Airports) as a condition of the use permit for home, apartment, or condominium construction and would serve as acknowledgement that aircraft overflights caused by the use of Metro Airport would traverse airspace directly above their property. A sample aviation-noise easement is attached for your review and consideration. It should be noted that the attached draft easement has received review and approval from the Federal Aviation Administration and Caltrans, Division of Aeronautics and has been accepted as a condition of use permit approved by the Sacramento County Board of Supervisors for the Sand Cove and Riverview condominiums projects which are also located in South Natomas.

Thank you for the opportunity to comment on the South Natomas Community Plan Revision.

Sincerely,

  
Larry E. Kozub  
Sr. Airport Planner

LEK:sam

\* \* DRAFT \* \*

GRANT OF AVIGATION AND NOISE EASEMENT

(Name of Property Owners) hereinafter called GRANTOR, for themselves, their heirs, administrators, executors, successors and assigns, does hereby grant to the County of Sacramento, a political subdivision of the State of California, its successors and assigns hereinafter called GRANTEE, in consideration of (land use permit or property rezone as appropriate) approved on (date) the receipt and sufficiency of which is hereby acknowledged, a perpetual avigation and noise easement as follows:

1. Description. The easement shall be an easement on, over, and upon that certain real property commonly known as (i.e. xyz condominiums or assessor's Parcel No. 123-45-678 as appropriate) situated within the County of Sacramento (or the County of Sutter, or the County of Yolo as appropriate) described in Exhibit A and outlined on property map Exhibit B attached hereto and by this reference incorporated herein.
2. Benefit. The easement shall be appurtenant to and for the benefit of all the real property comprising the Sacramento Metropolitan Airport hereinafter called AIRPORT, and such other additional property or interest therein as shall be subsequently acquired or designated from time to time by GRANTEE or its successors as constituting a part of the AIRPORT. The easement shall be for the benefit of GRANTEE and all other persons and entities who directly or indirectly use the easement as a result of any type of use of

the property and facilities constituting the AIRPORT, including aviation ground and flight operations.

3. Use and Purpose. The easement shall be used for the unobstructed passage of all aircraft now known or hereafter invented, used or designed for navigation of or flight in the air by whomsoever owned and operated in the airspace above GRANTORS' property above (height restrictions as appropriate) together with the right to cause in all airspace above GRANTORS' property such noise, vibration, fumes, dust, fuel particles, and all other effects that may be caused by the operation of aircraft landing or taking off from or operating at or on AIRPORT. GRANTOR does hereby confirm that all such uses of the airspace shall be without any liability of GRANTEE or of any other person or entity entitled to the benefits of this easement, to GRANTOR, GRANTOR'S heirs, assigns or successors in interest to all or any part of the property or any interest therein or to any other person or entity using or located on or in the area subject to the easement, for damage to property or physical or emotional injury to persons, animals or any other living thing, the diminution in value of any personal or real property, discomfort or inconveniences of any type of kind to any person or things, or interference with television, radio or other types or kinds of electrical reception, transmissions or activities in the easement; and GRANTOR, for itself and on behalf of the GRANTOR'S heirs, assigns or successors in interest to all or any part of the property, or any interest therein and each person or entity using or located on or in the area subject to this easement, hereby releases

and discharges GRANTEE and all persons and entities entitled to the benefits of the easement from all claims, demands, actions and causes of action of all types or kinds, known or unknown, existing or which might be created hereafter by statute or case decision, arising out of any of the foregoing described injuries or damages resulting from the use of this easement by GRANTEE and any other person or entity entitled to the benefits of this easement.

4. Right of Ingress/Egress. The easement herein granted includes the continuing right of the GRANTEE to prevent the erection or growth upon GRANTORS' property of any building, structure, tree, or other object extending into the airspace above (height restriction as appropriate) and to remove from said airspace, or at the sole option of GRANTEE, as an alternative, to mark and light as obstructions to air navigation any such building, structure, tree or other object now upon or which in the future may be upon GRANTORS' property, together with the right of ingress to, egress from, and passage over GRANTORS' property for such purpose.
5. Presumption. Notwithstanding previous sections of this grant of easement, there is hereby created an irrefutable presumption that this grant of easement is so over-burdened by unreasonable use that its purpose is defeated if the noise which impinges on the GRANTORS' property exceeds an amount equal to or greater than 3.0dB Community Noise Equivalent Level above that level described in subsection (a) of this section and GRANTOR may seek a court finding that the easement is extinguished;

a. The annual Community Noise Equivalent Level reflected on the latest map for the AIRPORT validated by County of Sacramento and filed with the California Department of Transportation, Division of Aeronautics and United States Department of Transportation, Federal Aviation Administration.

6. Exemption

The provisions of this section shall not apply to the use or operation of aircraft owned by the United States or in times of National emergency or National defense as may be declared by the President of the United States.

7. Negligent Operation of Aircraft. This grant of easement shall not deprive the GRANTOR, his successors or assigns, of any rights that it may from time to time have against any individual a private operator of an aircraft for negligent or unlawful operation of aircraft.

8. Term of Enforcement. This grant of easement shall continue in effect until AIRPORT shall be abandoned and shall cease to be used for public purposes.

DATED \_\_\_\_\_ BY \_\_\_\_\_

\_\_\_\_\_  
(NOTARIAL ACKNOWLEDGEMENT)

\_\_\_\_\_  
(GRANTOR)

(SEAL)

**SMUD**

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento, CA 95813; (916) 452-3211  
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

December 11, 1984

## CITY PLANNING DEPARTMENT

DEC 13 1984

RECEIVED

DIANA PARKER  
ASSOCIATE PLANNER  
CITY OF SACRAMENTO  
CITY PLANNING DEPARTMENT  
927 TENTH STREET  
SACRAMENTO CA 95814

Dear Diana:

The Sacramento Municipal Utility District has received and reviewed the Draft Environmental Impact Report for south Natomas Community Plan Update and Related Projects. We have the following comments.

In general, the present electrical section of the Draft EIR is up-to-date and it is not expected that any changes will occur in the future.

We have comments on specific sections of the Draft EIR.

Page L-1, Paragraph 3: A substation site measuring 100' X 150' would be acquired anticipating the need to install two 20 kva transformers (69kV to 12kV) with related equipment. Additional area is seldom acquired or required.

In the Summary Tables in Section U, it is noted that conservation and load management programs are the mitigation from some of the developments. It cannot be implied the conservation and load management will defer the need of a substation and associated overhead transmission lines that will be built to satisfy the increased electrical needs brought about by the development.

When a substation is required, it should be noted in the Impacts Section that overhead 69kV lines will also be required into and out of the substations. We have made some corrections on Exhibits L-2 and L-5 to correct specific substation locations and transmission line corridors. Please refer to these attached exhibits.

We have also made specific editorial comments to the text. These are attached.

Please feel free to contact me at (916) 732-6223 if you have any comments or questions.

*Paul Olmstead*  
Paul Olmstead  
Environmental Specialist

## Section L

## ENERGY

Setting

Electricity is supplied to the South Natomas area by the Sacramento Municipal Utility District (SMUD). SMUD furnishes electrical power and services to over 349,000 customers. Electricity is transmitted throughout the service area on 230,000 and 115,000 volt transmission lines to major power substations. There are six major substations in operation, one currently under construction, and two currently in the planning stages within SMUD's service area. The closest one to South Natomas is the Elverta Substation, located along Elverta Road approximately 1 mile east of the Natomas East Main Drainage Canal.

At the Elverta Substation, power at 230,000 volts is stepped down to 69,000 volts and is routed to neighborhood substations throughout the South Natomas community. At these neighborhood substations, the voltage is reduced to 12,000 volts and fed into the distribution system. Pole and padmounted transformers make the final voltage reduction from 12,000 volts to 120/240 volt single phase for residential customers and 120/240 volt single phase or 480 volt three phase for commercial and light industrial customers.

Most neighborhood substation sites are approximately 15,000 sf (100 feet by 150 feet) and contain one transformer, switching equipment, and capacitors, all within an 8-foot-high enclosure. ~~A substation with room for two transformers requires about 500 more sf.~~ After the substation equipment is installed, landscaping is done to conform to the surrounding neighborhood. Approximately 2-3 years lead time is necessary to site a new substation (Pearson pers. comm.).

The approximate locations of existing South Natomas 69,000 volt lines and neighborhood substations are shown in Exhibit L-2. Presently all substations located within the study area are served by the same 69,000 volt line from Elverta.

SMUD's policy is to install 69,000 volt lines on overhead, single wood or steel poles. SMUD on occasion will install 69,000 volt underground lines if the customer pays the cost difference; there is an additional cost of approximately \$550,000 per mile to install a 69,000 volt underground line (\$80,000 per mile overhead versus \$630,000 per mile underground). A minimum 10-foot easement is usually required for overhead 69,000 volt lines.

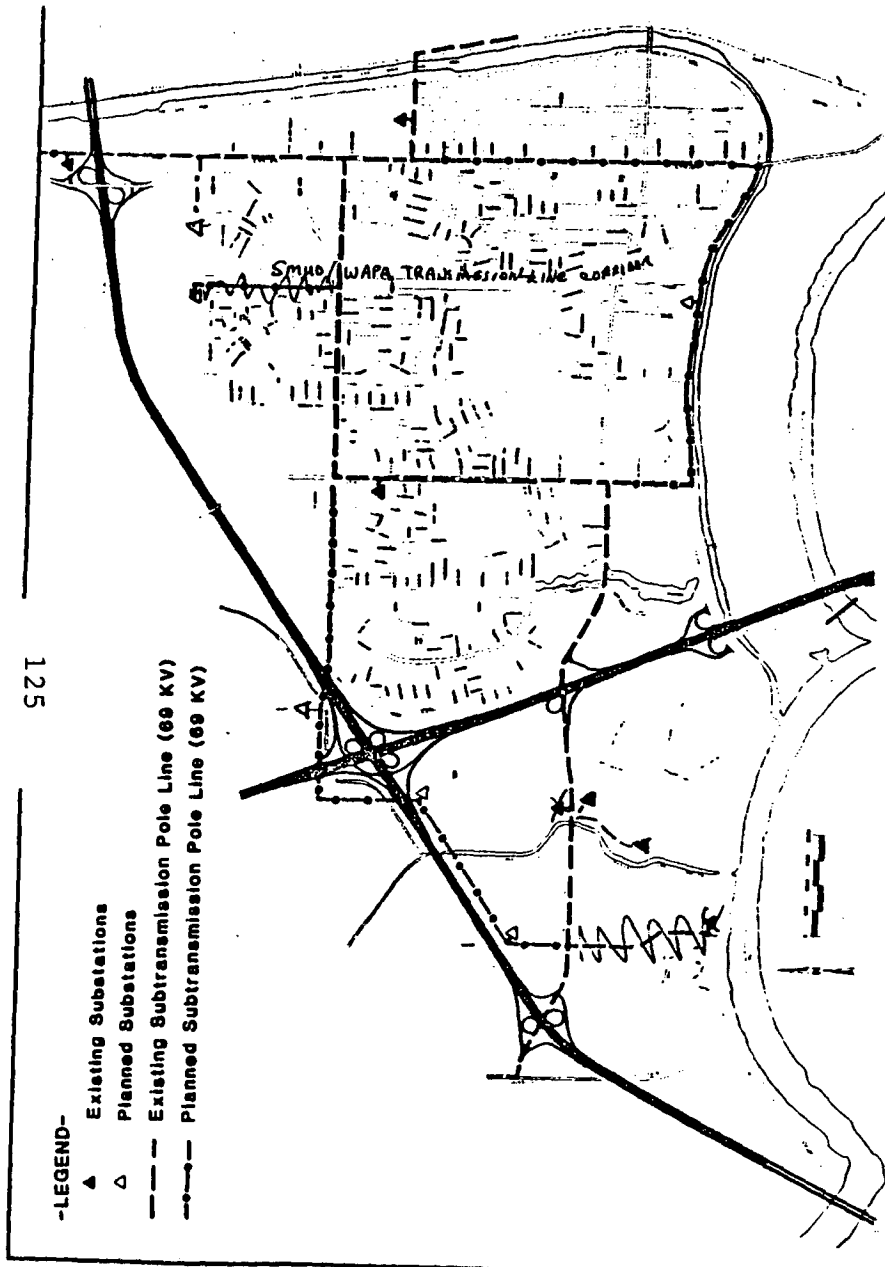


EXHIBIT L-2. SMUD EXISTING AND PLANNED SOUTH NATOMAS FACILITIES

The new 69,000 volt line sections shown in Exhibit L-2 have been planned to create a looped system. This ~~would~~ allows each substation to be served from two different directions, which ~~would~~ improves reliability.

A new 69,000 volt line from Elverta would have to be built in order to serve the area at build-out. Currently only one 69,000 volt line from Elverta serves the entire South Natomas area. Details on how this new line would be routed into South Natomas have not been determined.

Natural gas service is supplied to the South Natomas area by the Pacific Gas and Electric Company (PGandE). PGandE presently has no distribution facilities in the undeveloped portions of South Natomas. Natural gas service extensions will be provided in accordance with Gas Rule 15 (Appendix IV). Specific development plans should be submitted to PGandE as soon as possible to facilitate provision of natural gas service (Metzler pers. comm.).

#### Impacts

##### Draft 1984 SNCP

The land uses proposed in the Draft 1984 SNCP would have an estimated peak energy requirement of 121.0 mW at build-out (Exhibit L-4). In order to serve this additional load, at least two and possibly three new substations would be required west of I-5. East of I-5 at least ~~two~~ new substations, in addition to those already planned, would be required to serve the estimated additional load (Pearson pers. comm.). The approximate locations where new substations would be required are illustrated in Exhibit L-5.

The impact of this increased demand could be reduced by implementing SMUD's Conservation Load Management Measures outlined in Appendix L.

No adverse impacts on PGandE would be anticipated as a result of providing extension of natural gas service according to Gas Rule 15 (Appendix L).

##### 1978 SNCP Alternative

The 1978 SNCP Alternative would have a peak energy requirement of 111.6 mW at build-out (Exhibit L-4). This additional energy demand would require the installation of ~~two~~ new substations, one on each side of I-5. The substation ~~east~~ of I-5 would be located along Garden Highway near Azusa Drive. A 69,000 volt loop should be ~~constructed~~ to improve the reliability of this substation. Exact substation siting and 69,000 volt line routing



## Summary Table. Continued

IMPACT CATEGORY	IMPACTS	FEASIBLE MITIGATION MEASURES
<b>B. POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS WHICH CAN BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL - Continued</b>		
<u>Public Facilities and Services</u>		
Police	Increased demand for police protection.	Clearly identify building numbers and provide lighting in parking areas. Increase funding for additional offices.
Parks	Deletion of an 11-acre park site designated in City Park Master Plan.  Increased employee demand for parks.	Developer to provide alternative park site.  Provide park financing by nonresidential users. Provide recreation facilities in office parcel.
<u>Transportation</u>		
Traffic	The project would increase traffic and contribute to unacceptable levels of service (prior to mitigation) at the following intersections:  W. El Camino Avenue/Northbound I-5  W. El Camino Avenue/Azevedo Drive  W. El Camino Avenue/Truxel Road	Diversion of drivers to alternate routes.  Revise signal phasing.  Revise signal phasing.
Transit	Increased demand on RT for bus or shuttle service during peak periods, potentially requiring greater seating capacity, more routes, or shorter headways.	Increase RT subsidies, recognize transit needs in project design, provide bus shelters and turnouts, and provide transit centers as necessary.
Local Circulation and Parking	No adverse impacts anticipated due to local circulation characteristics of the project parking provisions are currently undefined.	Review future plans to ensure that adequate parking is provided.
Noise	Predicted on-site Ldn of 70-74 dB. Land use/noise compatibility category "C" (use should be discouraged; if permitted, noise reduction measures required).	Use building design and materials to provide 15-25 dB reduction of outdoor noise levels.
Energy	Peak energy demand of 16,800 kilowatts; project requires the addition of a new substation on or near the site. <b>AND ASSOCIATED 69 KV OVERHEAD TRANSMISSION LINES.</b>	Implement EMD's Energy Conservation Load Measures.
Air Quality	Violation of both federal and state CO standards expected. Project would incrementally add to regional smog problems and difficulty in achieving and maintaining state and federal ozone standards.	Implement contingency air quality control measures in regional 1990 Air Quality Plan.
<b>C. LESS THAN SIGNIFICANT IMPACTS</b>		
<u>Land Use</u>		
Market Feasibility	Office absorption: in 5.7 years.	None.

## EXHIBIT L-5. DRAFT 1984 SNCP GENERALIZED DISTRIBUTION SYSTEM AND SUBSTATION SITING PLAN

LEGEND-

— EXISTING SUBTRANSMISSION POLE LINE 69KV  
 - - - PLANNED SUBTRANSMISSION POLE LINE 69KV  
 ..... PROPOSED SUBTRANSMISSION POLE LINE 69KV  
 ▲ EXISTING NEIGHBORHOOD SUBSTATION  
 ▼ PLANNED NEIGHBORHOOD SUBSTATION  
 ■ PROPOSED NEIGHBORHOOD SUBSTATION



## Environmental Council of Sacramento, Inc.

### Comments

South Natomas Community Plan and Draft EIR  
December 6, 1984

CITY PLANNING DIVISION  
DEC 5 1984  
RECEIVED

#### Member Organizations

American Lung  
Association of  
Sacramento ---  
Emigrant Trails  
Audubon Society  
California Native  
Plant Society,  
Sacramento  
Valley Chapter  
California Park and  
Recreation  
Society, District 11  
Capitol Bicycle  
Commuters  
Association  
L I Women Voters  
Sacramento  
K I and Society of  
romantic  
P I arethood  
I I cation of  
S I 'camento  
to County  
S I Bureau  
to Old City  
I cation  
to Valley  
S I e Advocates  
Save the American River  
Association  
Sierra Club, Mother Lode  
Chapter  
South Natomas  
Community  
Association  
Zero Population Growth

We wish to incorporate by reference previous comments on the North Natomas Community Plan and the Creekside-Gateway Final EIR, as appropriate.

In general we would say that the revision of this community plan is a substantial shift from a transit-oriented residential community closely linked to downtown, to an auto-oriented community with mixed land use. The resulting negative impacts on air quality and traffic circulation are significant. Much more can be done in the EIR, and the planning process to mitigate these negative impacts.

Traffic generation rates should be held to the citywide standard; park allocation should also meet the citywide standard. Maximum natural area preservation is needed to provide adequate habitat for wildlife to remain in the city.

It is unclear how the revision of the South Natomas Community Plan fits into the overall plan for the city's growth. How are these changes articulated with the community plans for downtown, Arden, Point West, North Sacramento and North Natomas? The changes proposed are not consistent with the existing general plan nor with the existing air quality plan.

The weakest part of the DEIR is the failure to identify mitigation measures in the area of agricultural land preservation and air quality maintenance. The Commission should direct staff and consultants to come up with further mitigation measures and to analyze their costs and benefits. It may be necessary to hold a public workshop, and to review the public testimony given at the Urban Development Task Force Meetings on Transportation and Air Quality (October 22) and Agricultural Land and Open Space Preservation (November 26).

With respect to loss of agricultural land, we believe that whenever productive agricultural land is converted to urban use, developers should

Page 2  
be required to purchase development rights on equivalent acreage elsewhere in the county, and donate those development rights to a public trust administered by a nonprofit organization. This is an appropriate mitigation measure, and should be part of the EIR.

With respect to regional air quality problems, there are numerous mitigation measures which ought to be included in the community plan and project EIRs. Please refer to the letter of the Sacramento Air Pollution Control District on the Creekside-Gateway DEIR, and the ECOS comments on the Creekside-Gateway FEIR. Please note that the 1982 Air Quality Plan requires a 30% reduction in all trips, while the city's trip reduction ordinance is aimed at a 15% reduction in work trips; compliance with the trip reduction ordinance alone is not adequate. Note also that since the 1982 plan does not reach attainment, and since the SNCP revision is not consistent with the plan, mitigation measures beyond the 1982 plan must be included in the community plan and project EIRs.

The EIR (P. J-4) presents an inadequate description of environmental impacts by failing to estimate the health impacts of the violation of the ozone and carbon monoxide standards. While the EIR recognizes a significant negative impact, it does not indicate the magnitude of the impact and estimated health, crop and property value losses. We have shown elsewhere that urbanization levels indicated in the SNCP July 1984 draft, and the SWA Alternative 1 for North Natomas (a low urbanization alternative) would result in a 740% increase in current carbon monoxide levels and a 834% increase in hydrocarbon emissions. We have estimated that at this level of urbanization, Sacramento would experience 150-200 unhealthy days per year, with over 150 days of ozone violations. We have not estimated the resulting health care costs for asthmatics, people with heart conditions, and others sensitive to air pollution. The EIR should examine these questions in detail.

Finally, we would note that the study assumptions and the modeling assumptions used to do the traffic analysis may not be adequate for a reasonable estimate of traffic impacts. Assumptions on p 42 of the Draft SNCPR appear self-contradictory. Traffic model assumptions about household composition and linked trips may be outdated since these patterns have changed substantially in the last ten years. If so, estimating and mitigating traffic congestion for new growth is a more difficult task than assumed. The risk of planning a new community based on old household patterns and needs, rather than emerging household patterns and needs, can be reduced considerably at this stage in the planning process through careful analysis by the Planning Commission.

D-4  
(cont.)

J-4

J-5

J-11

TIMOTHY E. AINSWORTH  
JEFFREY A. DELAND  
RICHARD H. HYDE\*  
NANCY C. MILLER  
CHRISTINA PRIM  
LEE SAVAGE  
\*A PROFESSIONAL CORPORATION

LAW OFFICES OF  
**HYDE, MILLER & SAVAGE**  
428 J STREET, SUITE 400  
SACRAMENTO, CALIFORNIA 95814  
(916) 447-7933

December 13, 1984

Diana Parker, Associate Planner  
Planning Department  
City of Sacramento  
927 10th Street  
Sacramento, CA 95814

Subject: Comments on Draft EIR for South Natomas Community  
Plan Update and Related Projects

Volume 2: Natomas Corporate Center

Page No.

- |   |   |            |
|---|---|------------|
| 3 | Per the existing Development Agreement and PUD Guidelines Section V B 2, the application proposes 25% minimum landscape coverage - - not 20% as stated in the DEIR. | B-1<br>NCC |
| 3 | The smallest proposed building is 9000 sf not 11,000 sf.  | B-2<br>NCC |

Note: The No-Project alternative should assume the existing environment. The 65.4 gross acre site is already substantially developed as follows:

- |  |            |
|--|------------|
| 3.2 acres/I-5 corridor (already landscaped)  |            |
| 5.1 acres/Streets completed or already graded  |            |
| 5.4 acres/98,065 sf completed structure  |            |
| 5.0 acres/87,579 sf structure under construction   |            |
| 6.84 acres/ 94,937 sf in two structures: special permits approved and building permit applications submitted in August 1984. Construction to commence Spring 1985 - probably prior to final action on the pending NCC application. | C-1<br>NCC |

Thus, at the time this application is heard by the City Council, only 39.84 acres will be vacant. Furthermore, the applicant proposes reservation/dedication for Bannon Slough protection of 4.5 of these 39.84 vacant acres, resulting in new development on 35.34 acres -- all of which are currently zoned OB.

6-7 The application does not result in the loss of 62 acres of prime agricultural land. Instead, it simply increases the density at which 35.34 vacant, developable, and currently OB zoned acres can be developed.

Given the irregular shape of these acres and the proximity of this vacant land to new office buildings on the West and Bannon Slough to the East, these 35.34 acres are not "prime agricultural land".

6-7 The application is not inconsistent with existing approved land use plans. As required by statute, such plans were specifically amended prior to rezoning the site to OB and approving other entitlements in December 1982.

6-7 The application is not inconsistent with the Draft 1984 SNCP. See attached December 13, 1984 letter to Diana Parker.

6-7 In Resolution 82-855, the City Council made the following finding in approving the 1982 Creekside Office Park project:

"That the potential loss of trees within the First Bannon Slough riparian woodland habitats (disclosed as a potentially significant unavoidable or irreversible impact in the DEIR) has been reduced to a less than significant impact by the . . . 40 feet area of land (as shown on the Creekside schematic) coupled with a relocation of an east-west street to a location satisfactory to the City."

The current application proposes the east-west street in the location approved by the City in 1982. Accordingly, the City Council has already found that this street will not cause any significant negative environment impact.

7 The traffic impact summary on page 7 is partially inconsistent with Exhibits I-3 and I-4 on pages 42 and 43, does not quantify the magnitude of this

project's contribution to congested intersections, and does not indicate that this project improves traffic at some intersections listed on the page 7 chart.

Comparison of Application  
& 1978 SNCP Traffic

I = improved  
W = worsened  
N = no change

	AM	PM
W. El Camino/Northgate	W 10	I 10
Garden/Northgate	N	W 10
Gateway Oaks/W. El Camino	I 10	W 40
*W. El Camino/I-5	I 10	N

\*Project improves rather than worsens traffic at this location.

- 13 The additional office space requested by the pending application would not be increased from 15,082 to 16,609 sf net acre; instead, the sf net acre would be increased from 13,893 to 15,311. See attached December 13, 1984 letter to Diana Parker.
- 26 The paragraph entitled "Increase residential densities" does not apply to this project.
- 27 The DEIR should acknowledge that (a) dedication and maintenance of the Bannan Slough preserve is part of the application; and (b) with respect to the preserve area, the existing development agreement is inconsistent with the 1984 Draft SNCP whereas the application is consistent with the 1984 Draft SNCP and the DEIR. See attached December 13, 1984 letter to Diana Parker.

Very truly yours,

HYDE, MILLER and SAVAGE

By:

CHRISTI PRIM

CP:jb

LAW OFFICES OF  
LORENZ AND CUTTER  
ATTORNEYS AT LAW  
850 FORUM BUILDING  
1107 NINTH STREET  
P. O. BOX 1893  
SACRAMENTO, CALIFORNIA 95809-1893

TELEPHONE  
(916) 442-0473

HERMANN E. LORENZ, JR.  
PROFESSIONAL CORPORATION  
KERRY E. CUTTER

December 7, 1984

Planning Department  
City of Sacramento  
927 Tenth Street  
Suite 300  
Sacramento, California 95814

CITY PLANNING DEPARTMENT

DEC 10 1984

RECEIVED

RE: PARK EL CAMINO, LTD.  
APPLICATION NO. P-83397  
SOUTH NATOMAS COMMUNITY PLAN

Dear Sir:

This office represents Park El Camino, Ltd., the owner and applicant in the above-referred matter.

This is in response to the Draft EIR and Draft South Natomas Community Plan Revision.

The Draft EIR analyzed Park El Camino on the basis of the application previously submitted, which was for an office park. During the community meeting process and when alternative community plans were submitted, it became apparent that a portion of Park El Camino would be designated highway/commercial. On July 10, 1984, this office wrote the Planning Department advising of the desire of Park El Camino to amend its application to designate 9 acres of the site to be highway/commercial and the balance to be office building. Enclosed herewith is a copy of the letter together with its enclosure.

The Draft EIR analyzed the project as if it were an office park and noted that the project was inconsistent with the revised Draft Community Plan. Therefore, the applicant will, before January 15, 1985, formally amend its application to request the highway/commercial and office building designations so that it will be consistent with the Community Plan.

Very truly yours,

HERMANN E. LORENZ, JR.  
Attorney at Law

HEL:cbe  
Enclosures  
cc w/enc.: Sacramento City Planning Commission

HERMANN E. LORENZ, JR.  
PROFESSIONAL CORPORATION  
KERRY E. CUTTER

LAW OFFICES OF  
LORENZ AND CUTTER  
ATTORNEYS AT LAW  
680 FORUM BUILDING  
1107 NINTH STREET  
P. O. BOX 1093  
SACRAMENTO, CALIFORNIA 95809-1093

TELEPHONE  
(916) 442-0473

July 10, 1984

Planning Department  
City of Sacramento  
927 Tenth Street  
Suite 300  
Sacramento, California 95814

RE: PARK EL CAMINO, LTD.  
APPLICATION NO. P-83397  
SOUTH NATOMAS COMMUNITY PLAN

Dear Sir:

After the review of Working Paper 3, which includes a draft of the South Natomas Community Plan, and after a personal meeting with John Blayney on July 3, 1984, Park El Camino, Ltd. wishes to amend its Application to provide certain adjustments.

Enclosed herewith are five copies of the suggested boundary demarcation between the proposed South Natomas Community Plan Preliminary Draft (Working Paper 3), together with a reduction thereof, which produces the following pertinent data:

Parcel "A"	Highway Commercial	Gross 9 acres	±
Parcel "B"	Office/Office Park	Gross 10.76 acres	±
Total Gross Area		19.76 acres	±

As discussed in our meeting with John Blayney on July 3, 1984, from a planning point of view, which is related strictly to aesthetics, we feel the proposed highway commercial strip as shown on Working Paper 3 will tend to instigate the same old, tired, tacky-tacky stereotype shops and services which are commonly related to highway commercial. We feel that this is outdated and incompatible with the intent and purpose of a modern aesthetic planning concept for the South Natomas area.

The reconfiguration of the proposed land uses suggested above precisely takes into consideration the possibility of a first class hotel and related facilities on Parcel "A" with a restaurant with banquet and meeting rooms

Sacramento City Planning Department

July 10, 1984

RE: PARK EL CAMINO, LTD.  
APPLICATION NO. P-83397

PAGE TWO

for dual purposes in order to meet the needs of the travelling public as well as hotel patrons and nearby office parks.

In addition to the above, we are also suggesting the relocation of vehicular ingress and egress to and from these facilities and land use designation from the original suggested access point at El Camino Avenue, to an access point directly from Orchard Avenue, mitigating any, if not all, traffic concerns that our original proposal may have caused.

However, under any circumstances, it is imperative that a minimum area of 9 acres be requested for the designation of highway commercial in order for the orderly and proper development of this site to take place and to afford the quality of development that we are sure will do justice to and satisfy the most demanding concerns.

If you have any questions or require any additional information, please do not hesitate to contact me.

Very truly yours,

HERMANN E. LORENZ, JR.  
Attorney at Law

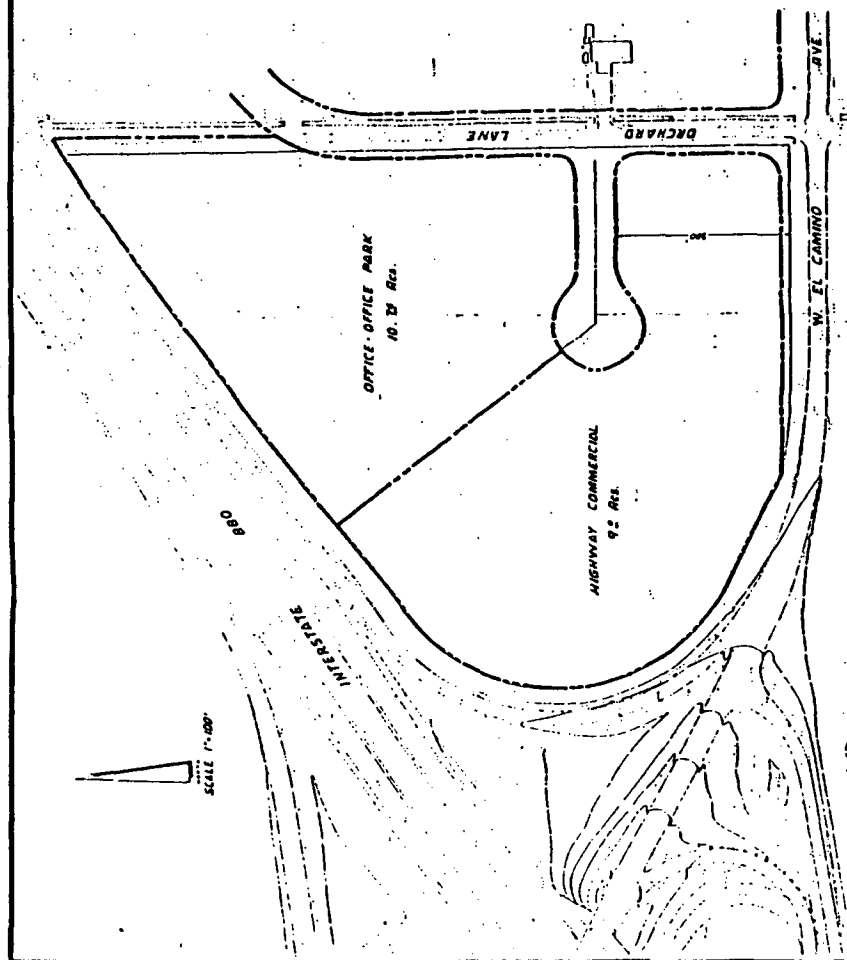
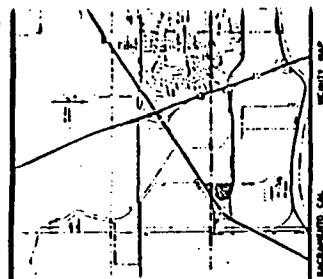
HEL:cbe  
Enclosures

cc John Blayney (VIA EXPRESS MAIL)  
Robert W. Fitzpatrick  
Luis Manzano  
John L. Erickson

B-1  
PEC  
(cont.)

B-1  
PEC  
(cont.)

130



# Land Planning Consultants

Leti Macgregor & Associates  
21220 Via Caliente Suite 100  
Westlake Village, California  
913-851-5555 91382

# Engineering

George O'Brien & Associates  
21220 Via Caliente Suite 100  
Westlake Village, California  
R.C.B. No. 15579 91382

# Park El Camino Ltd.

Teachers Management & Investment Corporation  
Corporate Offices - The TMI Building  
4 Upper Newport Plaza  
Newport Beach, California  
92660

**TMI**

PARK EL CAMINO

APPLICATION NO. P-8335

MARTIN McDONOUGH  
ALFRED E. HOLLAND  
BRUCE F. ALLEN  
V. BARLOW GOTT  
JOSEPH E. COOKES, JR.  
WILLIAM G. HOLLIMAN, JR.  
DAVID J. SPOTTISWOOD  
ELMER R. MALAKOFF  
VERLYN W. JENSEN  
RICHARD W. NICHOLS  
DONALD C. POOLE  
RICHARD W. COSEN  
RICHARD E. BRANDT  
GARY F. LOVENIDGE  
G. RICHARD BROWN  
DENNIS D. O'NEAL  
DAVID W. POST  
SUSAN R. EDLUND  
BRUCE McDONOUGH  
WILLIAM L. OWEN  
DAVID F. BEATTY  
JAMES B. O'NEAL  
ALICE A. WOODWARD  
MICHAEL T. FOGARTY  
HARRY E. HULL, JR.  
STEPHEN ROBBINS

DENNIS W. DE CUIR  
ANN O'CONNELL  
ROBERT W. O'CONNOR  
GREGORY W. SANDERS  
JEFFRY R. JONES  
BETSY S. KIMBALL  
SUSAN L. SCHENK  
SABINA D. GILBERT  
DAWN H. COLE  
JOHN W. TAYLOR  
JANET NEELEY KARNHE  
JOHN E. DI GIUSTO  
CRAIG K. POWELL  
SHARON D. ROSEME  
JOHN J. FLYNN III  
RONALD A. WORLEY  
IRIS P. YANG  
DAVID S. SALEM  
T. BRENT HARRIS  
VIRGINIA A. CANNILL  
JAMES L. LEE  
G. MICHAEL BROWN  
HARRIET A. STEINER  
PATRICIA D. ELLIOTT

# McDONOUGH, HOLLAND & ALLEN

A PROFESSIONAL CORPORATION  
ATTORNEYS

555 CAPITOL MALL, SUITE 950  
SACRAMENTO, CALIFORNIA 95814  
(916) 444-3900

December 14, 1984

SOUTHERN CALIFORNIA OFFICE  
3800 PARK CENTER DRIVE, SUITE 710  
COSTA MESA, CALIFORNIA 92626  
(714) 835-9000

WASHINGTON, D.C. OFFICE  
1875 EYE STREET, NW  
SUITE 1275  
WASHINGTON, D.C. 20008  
(202) 835-0810

JAMES F. MCCONNELL, JR.  
\*ADMITTED IN DISTRICT OF COLUMBIA ONLY

CITY PLANNING DEPARTMENT

DEC 17 1984

RECEIVED

Mr. Clif Carstens  
City Planning Department  
927 - 10th Street, Room 300  
Sacramento, California 95814

Re: Comments on Draft 1984 South Natomas Community  
Plan and Draft Environmental Impact Report

Dear Clif:

On behalf of McCuen & Steele, and pursuant to your notice and circulation of the Draft Environmental Impact Report for the Draft 1984 South Natomas Community Plan, we submit these comments and request that they be made a part of the record.

We respectfully disagree with the finding in the Draft EIR that "conversion of agricultural land" is a significant adverse impact and one which cannot be mitigated. Even under a "no project" alternative, preservation of the remaining agricultural land within the South Natomas Community Plan area is no longer feasible in view of the urbanization of the area which has already occurred. More importantly, however, the decision that the South Natomas area should be urbanized was made many years ago, subsequent to consideration of environmental assessments at that time and the Draft 1984 Community Plan does not result in any such impact.

We also disagree with the finding that six of the seven intersections described in the summary table, Exhibit C-5, will result in significant adverse impacts which

C-1

C-2

Mr. Clif Carstens  
December 14, 1984  
Page 2

cannot be mitigated to a less than significant level.

The Draft Community Plan is intended to be a long-range plan within a much larger regional area which is undergoing significant change. The impacts are assessed for total buildout under existing conditions, as though such conditions will continue to prevail for the twenty-year life of the plan. The plan should also contemplate and provide for changes in existing conditions which are designed to avoid the impacts which would result if total buildout of the plan area were to occur instantaneously. Traffic systems management programs, as they relate to traffic impacts, and to air quality impacts, provide a substantial potential in excess of that considered in the Draft Plan and EIR for mitigating those impacts which would presently occur otherwise.

We disagree with the last stated principle under section 4.1 on page 25 of the Draft Community Plan. It is our firm belief that a large, integrated, campus-like office park would provide an opportunity for major office users who do not desire to locate in a downtown environment and who will otherwise locate outside the City. We generally agree with the other location principles contained in the Plan.

On the land use map, between pages 5 and 6 in the Draft Community Plan, that area lying east of Truxel and immediately south of I-80 is designated for residential use. It is highly inappropriate to place such residential uses contiguous to an interstate freeway for the same reasons enunciated by the planning consultant with respect to freeway frontage west of I-5. There is already a business park located in the vicinity of the intersection of I-80 and Northgate Boulevard, as well as existing and proposed industrial development in the North Natomas area. There is substantial ability to integrate non-residential uses contiguous to the freeway with residential uses to the south in a compatible manner. Certainly, consideration should be given to displacing potential housing areas contiguous to interstate freeways prior to consideration of displacing potential residential housing in other portions of North and South Natomas.

Mr. Clif Carstens  
December 14, 1984  
Page 3

We look forward to an opportunity to present to the Planning Commission and the City Council project proposals consistent with these comments, which we believe will assist in providing a balanced community of compatible uses in South Natomas.

Sincerely,

*William G. Holliman, Jr.*

William G. Holliman, Jr.

WGH/ean

C-2  
(cont.)

C-3

**McDONOUGH, HOLLAND & ALLEN**

A PROFESSIONAL CORPORATION  
ATTORNEYS

555 CAPITOL MALL, SUITE 980  
SACRAMENTO, CALIFORNIA 95814  
(916) 444-3900

December 14, 1984

MARTIN McDONOUGH  
ALFRED E. MCNEILAND  
BRUCE F. ALLEN  
V. BARLOW SOFF  
JOSEPH E. COOMES, JR.  
WILLIAM G. HOLLIMAN, JR.  
DAVID J. SPOTTSWOOD  
ELMER R. MALAKOFF  
VERLYN H. JENSEN  
RICHARD W. RICHOLS  
DONALD C. POOLE  
RICHARD W. OSEEN  
RICHARD E. BRANDT  
GARY F. LOVERDOE  
O. RICHARD BROWN  
DENNIS D. O'NEIL  
DAVID W. POST  
SUSAN K. EDLING  
BRUCE McDONOUGH  
WILLIAM S. OWEN  
DAVID F. BEATTY  
JAMES B. O'NEAL  
ALICE A. WOODWARD  
MICHAEL T. FOGARTY  
HARRY E. HULL, JR.  
STEPHEN ROBBINS

DENNIS W. DE CUIR  
ANN O'CONNELL  
RUBERT W. O'CONNOR  
GREGORY W. SANDERS  
JEFFREY R. JONES  
BETSY S. AMBALL  
SUSAN I. SCHENING  
SABINA D. GILBERT  
DAWN H. COLE  
JOHN M. TAYLOR  
JANET NELLEY KVARME  
JOHN E. DI GIUSTO  
CAROL R. POWELL  
SHARON D. ROSEME  
JOHN J. FLYNN W.  
RONALD A. WICKLEY  
IRIS P. YANG  
DAVID S. SALEM  
T. BRENT HARRKINS  
VIRGINIA A. CHASE  
JAMES L. LEST  
O. MICHAEL BROWN  
HARRIET A. STEINER  
PATRICIA D. ELLIOTT

SOUTHERN CALIFORNIA OFFICE  
3800 PARK CENTER DRIVE, SUITE 710  
COSTA MESA, CALIFORNIA 92626  
(714) 835-8000

WASHINGTON, D.C. OFFICE  
1875 EYE STREET, NW  
SUITE 1278  
WASHINGTON, D.C. 20008  
(202) 835-0610

JAMES F. McCONNELL, JR.  
\*Admitted in District of Columbia Only

Mr. Clif Carstens  
December 14, 1984  
Page 2

We also disagree with the finding that six of the seven intersections described in the summary table, Exhibit C-5, will result in significant adverse impacts which cannot be mitigated to a less than significant level.

C-2  
C&P  
STC

There are both changes in the projects and mitigation measures which may be taken to substantially reduce the traffic impacts of the projects as defined in the Draft EIR. In response to the Draft EIR and the traffic analysis, we intend to substantially reduce the densities of both projects as originally proposed and to submit revised plans in mitigation of the impacts set forth in the Draft EIR. We have attached hereto a report from Joseph R. Holland, consulting traffic engineer, with further comments on the traffic analysis in the Draft EIR. The report illustrates the extent to which the traffic impacts would be mitigated by scaling down the projects as described under "McCuen & Steele Application."

I-1  
C&P  
STC

We look forward to an opportunity to present to the Planning Commission and the City Council project proposals consistent with these comments, which we believe will assist in providing a balanced community of compatible uses in South Natomas.

Sincerely,

*William G. Holliman, Jr.*  
William G. Holliman, Jr.

WGH/ean

C-1  
C&P  
STC

Mr. Clif Carstens  
City Planning Department  
927 - 10th Street, Room 300  
Sacramento, California 95814

Re: Comments on Draft Environmental Impact Report  
for the Sammis Technology Center and Capital  
Business Park Projects

Dear Clif:

On behalf of McCuen & Steele, and pursuant to your notice and circulation of the Draft Environmental Impact Report for the Sammis Technology Center and Capital Business Park projects, we submit these comments and request that they be made a part of the record.

We respectfully disagree with the finding in the Draft EIR that "conversion of agricultural land" is a significant adverse impact and one which cannot be mitigated. Even under a "no project" alternative, preservation of the remaining agricultural land within the South Natomas Community Plan area is no longer feasible in view of the urbanization of the area which has already occurred. More importantly, however, the decision that the South Natomas area should be urbanized was made many years ago, subsequent to consideration of environmental assessments at that time and the Draft 1984 Community Plan does not result in any such impact.



Reply to:  
2415 L Street  
Sacramento, CA 95816  
(916) 448-8004

120 Palm Avenue  
Ripon, CA 95386  
(209) 599-2200

Associated Consultant:  
D. Jackson Faustman, D. Eng.

December 4, 1984

McCuen & Steele  
10969 Trade Center Drive, Suite 100  
Rancho Cordova, California 95670

Attention: Madelon Randall, Vice President

Subject: Comments on the Draft 1984 SNCP EIR

Gentlemen:

Submitted herein for your information and use are my comments on the Draft 1984 SNCP EIR prepared by the City of Sacramento. The comments contained herein are applicable to the EIR for the Draft 1984 SNCP as well as to the EIR's for Capitol Business Park and Sutter Business Center West (formerly Sammis Technology Center). These comments are limited to the transportation element of the DEIRs.

While the traffic analysis described in the DEIRs attempts to quantify the absolute nature of each project's traffic impacts, the methodology used places certain restrictions on the traffic forecasts which leave area for disagreement on the accuracy of the absolute traffic levels and peak hour conditions projected. These specific restrictions include:

- limited shifting of travel demand in time, in response to congested traffic conditions,
- prohibition of out-of-direction travel to avoid congested traffic conditions, and
- limited allowance for the combined effects of TSM measures, transit usage, and over-estimation of traffic levels by stand-alone type trip generation rates.

The analysis does assume a 15 percent across the board reduction in traffic levels to reflect the City's current policy for trip reduction through TSM measures. This does not seem adequate, however, in light of the wide spectrum of related elements and factors, such as:

- Transit usage (bus and possible future light rail)

McCuen & Steele  
Comments on Draft 1984 SNCP EIR  
December 4, 1984

Page 2

- TSM measures
  - \* staggered working hours
  - \* flex-time programs
  - \* ridesharing (carpools, vanpools, buspools)
  - \* mode diversification (walking, cycling)
- The tendency of stand-alone land use trip generation rates to over-estimate traffic levels when applied to a community or sub-regional sized study area.
- The propensity of motorists to naturally avoid congestion and delay by alternate route selection (even if out-of-direction travel is involved) and shifting of travel in time (e.g., waiting-out the rush before starting home, etc.).

Intuitively, a more realistic adjustment would seem to be in the 20 to 25 percent range overall, with even higher adjustments for some trip types (e.g. HBW). This range of adjustment is consistent with the ranges used in the South Sacramento/Laguna studies and the East Area Transportation studies.

The primary value of the DEIR's traffic analysis is for relative comparison between the various development scenarios evaluated. The relative peak hour traffic conditions associated with each development scenario are compared with those of the 1978 SNCP (as amended in 1982) to identify the relative differences in impacts. This approach is useful, as far as it goes; however, it would serve the purposes of comparison better if the peak hour conditions table for each development (Exhibits I-3 in Volume 2) also included similar data for each site's development as proposed by the Draft 1984 SNCP.

The tabular data accompanying these comments present just such a comparison for the Capitol Business Park site and the Sutter Business Center West site, including the current McCuen & Steele proposed development scenarios. These data were derived using the basic data presented in the EIRs, with extrapolations based on the differences in trip generation levels for the respective sites. The EIR's trip generation rates were used (see enclosed Exhibit 1), with a

I-2  
CBP  
STC  
(cont.)

I-3  
CBP  
STC

I-4  
CBP  
STC

I-2  
CBP  
STC

134

12 percent reduction to non-residential rates to parallel the adjustment procedure outlined in the EIR.

#### Capitol Business Park

Exhibit 2 presents the various development scenarios and the associated peak hour traffic generation estimates for the Capitol Business Park development. The percentage comparisons presented in this exhibit provide an indication of the relative peak hour traffic levels associated with each scenario.

Exhibit 3 presents the projected peak hour traffic conditions for each scenario at several key intersections evaluated by the EIRs. This exhibit corresponds to the Exhibits I-3 of Volume 2 of the DEIR, and shows the impacts on peak hour traffic conditions of the various development scenarios, while the rest of the South Natomas Area remains as shown in the 1978 SNCP.

These two exhibits reveal the following important facts regarding the current McCuen & Steele proposed development scenario for Capitol Business Park:

1. The McCuen & Steele proposal would generate 21 percent less traffic in the AM peak hour and 28 percent less traffic in the PM peak hour than the development scenario analyzed by the EIR.
2. With a few very insignificant exceptions, the projected traffic conditions of the McCuen & Steele proposal are equal to or better, in terms of saturation levels and/or service levels, than those estimated for the development scenario analyzed by the EIR.
3. When compared to the Draft 1984 SNCP development scenario, the projected traffic conditions of the McCuen & Steele proposal show saturation percentages which differ by -1 to +10 percentage points; however, only two Level of Service changes occur (at W. El Camino/Azevedo a 1 percentage point increase results in the change from Level B to Level C, and at W. El Camino/Truxel a 1 percentage point increase results in the change from Level C to Level D).
4. For all practical purposes, the projected impacts on

I-4  
CBP  
STC  
(cont.)

peak hour traffic conditions of the proposed McCuen & Steele development scenario for Capitol Business Park are similar to the traffic impacts of development of the site as proposed by the Draft 1984 SNCP.

#### Sutter Business Center West

Exhibit 4 presents the various development scenarios and the associated peak hour traffic generation estimates for the Sutter Business Center West development. The percentage comparisons presented in this exhibit provide an indication of the relative peak hour traffic levels associated with each scenario.

Exhibit 5 presents the projected peak hour traffic conditions for each scenario at several key intersections evaluated by the EIRs. This exhibit corresponds to the Exhibits I-3 of Volume 2 of the DEIR, and shows the impacts on peak hour traffic conditions of the various development scenarios, while the rest of the South Natomas Area remains as shown in the 1978 SNCP.

These two exhibits reveal the following important facts regarding the current McCuen & Steele proposed development scenario for Sutter Business Center West:

1. The McCuen & Steele proposal would generate 34 percent less traffic in the AM peak hour and 36 percent less traffic in the PM peak hour than the development scenario analyzed by the EIR.
2. With a few very insignificant exceptions, the projected traffic conditions of the McCuen & Steele proposal are equal to or better, in terms of saturation levels and/or service levels, than those estimated for the development scenario analyzed by the EIR.
3. When compared to the Draft 1984 SNCP development scenario, the projected traffic conditions of the McCuen & Steele proposal show saturation percentages which differ by -1 to +8 percentage points; however, no worsening of service levels occurs.

I-5  
CBP

I-5  
STC

I-5  
CBP

McCuen & Steele  
Comments on Draft 1984 SNCP EIR  
December 4, 1984

Page 5

4. For all practical purposes, the projected impacts on peak hour traffic conditions of the proposed McCuen & Steele development scenario for Sutter Business Center West are similar to the traffic impacts of development of the site as proposed by the Draft 1984 SNCP.

I-5  
STC  
(cont.)

Very Truly Yours,

*Joseph R. Holland*  
Joseph R. Holland  
Consulting Traffic Engineer

encl

# TRIP GENERATION RATES

Land Uses	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Office (per K sf)	1.86	0.35	0.27	1.36
Comm (per K sf)				
50-100,000	1.24	1.16	3.78	4.02
200-300,000	0.40	0.20	2.34	2.46
Residential (per du)	0.10	0.40	0.40	0.20

[ Source: Exhibit I-4, Draft 1984 SNCP EIR - Volume 1 ]

*JH* \_\_\_\_\_ Joseph R. Holland

Consulting Traffic Engineer \_\_\_\_\_

## EXHIBIT 2

CAPITOL BUSINESS PARK  
COMPARISON OF DEVELOPMENT SCENARIOS

Land Uses	1978 SNCP as amended 1982	Appli- cation Analyzed by EIR	McCuen & Steele Appli- cation	Draft 1984 SNCP
Offices sf	733,210	2,570,000	1,980,000	1,573,210
Commercial sf	196,000	247,000	85,000	85,000
Residential du	900	0	0	336
<b>Trip Generation</b>				
AM Peak Hour				
In	1,440	4,290	3,330	2,700
Out	720	840	700	710
Total	2,160	5,130	4,030	3,410
% of application analyzed by EIR	42%	100%	79%	66%
PM Peak Hour				
In	1,030	1,120	750	790
Out	1,600	3,610	2,670	2,250
Total	2,630	4,730	3,420	3,040
% of application analyzed by EIR	56%	100%	72%	64%

EXHIBIT 3  
CAPITOL BUSINESS PARK

	1978 SNCP as amended 1982				Application Analyzed by EIR				McCuen & Steele Application				DRAFT 1984 SNCP			
	AM	PM	LOS	Sat.	AM	PM	LOS	Sat.	AM	PM	LOS	Sat.	AM	PM	LOS	Sat.
E. Gateway Oaks Dr./W. El Camino Ave	D	82	D	78	D	81	D	81	D	81	D	81	D	82	D	89
W. El Camino Ave./NB 1-5 Off-ramp	E*	105	D	83	E*	133	D	79	E*	135	D	81	E*	125	D	82
W. El Camino Ave./ Alameda Dr.	B	63	D	83	C	69	E	93	C	67	D	87	B	66	D	85
W. El Camino Ave./ Truxel Rd.	C	74	D	80	D	81	D	87	D	78	D	83	C	77	D	81
W. El Camino Ave./ Northgate Blvd.	E	100	E*	113	E*	121	E*	114	E*	113	E*	113	E*	109	E*	113
Garden Hwy./NB 1-5 Ramps	A	53	D	80	B	64	D	82	B	60	D	81	B	58	D	80
Garden Hwy./Truxel Rd.	A	46	D	85	B	60	D	87	A	55	D	86	A	52	D	85
Garden Hwy./Northgate Blvd.	E*	104	E*	195	E*	116	E*	206	E*	112	E*	199	E*	109	E*	197
Truxel Rd./New I-80 Frontage Rd.	C	69	A	54	D	83	A	52	C	77	A	53	C	74	A	54
Northgate Blvd./New I-80 Frontage Rd.	A	46	C	71	A	47	C	72	A	47	C	71	A	46	C	71
Truxel Rd./San Juan Rd.	A	53	A	37	C	70	A	43	B	64	A	39	B	60	A	38
San Juan Rd./Northgate Blvd.	A	44	C	69	A	50	C	70	A	48	C	69	A	47	C	69

E\* = Saturation levels exceed 100%



Joseph R. Holland

Consulting Traffic Engineer

EXHIBIT 4

SUTTER BUSINESS CENTER WEST  
COMPARISON OF DEVELOPMENT SCENARIOS

Land Uses	1978 SNCP as amended 1982	Appli- cation Analyzed by EIR	McCuen & Steele Appli- cation	Draft 1984 SNCP
Offices sf	0	862,950	0	0
High Technology sf	0	862,950	1,200,000	0
Residential du	800	0	0	840
Trip Generation				
AM Peak Hour				
In	60	2,610	1,730	80
Out	250	470	300	340
Total	310	3,080	2,030	420
% of application analyzed by EIR	10%	100%	66%	14%
PM Peak Hour				
In	270	470	370	330
Out	130	1,860	1,110	170
Total	400	2,330	1,480	500
% of application analyzed by EIR	17%	100%	64%	21%

JH

Joseph R. Holland

Consulting Traffic Engineer

EXHIBIT 5  
SUTTER BUSINESS CENTER WEST

	1978 SNCP as amended 1982				Application Analyzed by EIR				McCuen & Steele Application				Draft 1984 SNCP			
	AM	PM	LOS	Sat.	AM	PM	LOS	Sat.	AM	PM	LOS	Sat.	AM	PM	LOS	Sat.
E. Gateway Oaks Dr./N. El Camino Ave	D	82	D	78	D	83	D	82	D	83	D	80	D	82	D	78
W. El Camino Ave./NB 1-5 Off-ramp	E*	105	D	83	E*	106	D	84	E*	106	D	83	E*	105	D	83
W. El Camino Ave./ Alameda Dr.	B	63	D	83	B	62	D	85	B	62	D	84	B	63	D	83
W. El Camino Ave./ Truett Rd.	C	74	D	80	C	74	D	81	C	74	D	80	C	74	D	80
W. El Camino Ave./ Northgate Blvd.	E	100	E*	113	E*	102	E*	122	E*	101	E*	117	E	100	E*	113
Garden Hwy./NB 1-5 Ramp	A	53	D	80	A	53	D	80	A	53	D	80	A	53	D	80
Garden Hwy./Truett Rd.	A	46	D	85	A	48	D	87	A	47	D	86	A	46	D	85
Garden Hwy./Northgate Blvd.	E*	104	E*	195	E*	112	E*	210	E*	108	E*	202	E*	104	E*	196
Truett Rd./New I-80 Frontage Rd.	C	67	A	54	C	66	B	62	B	66	B	58	C	67	A	54
Northgate Blvd./New I-80 Frontage Rd.	A	46	C	71	B	63	D	85	A	55	D	78	A	47	C	72
Truett Rd./San Juan Rd.	A	53	A	37	A	51	A	37	A	52	A	37	A	53	A	37
San Juan Rd./Northgate Blvd.	A	46	C	69	A	49	D	81	A	47	C	75	A	46	C	70

E\* = Saturation level exceeds 100%

EXHIBIT 5

WEISSBURG AND ARONSON, INC.

ATTORNEYS AT LAW  
32<sup>ND</sup> FLOOR, TWO CENTURY PLAZA  
2048 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90087  
TELEPHONE (213) 877-2223  
TELECOPIER (213) 887-8478

SACRAMENTO OFFICE

880 "J" STREET, SUITE 490  
SACRAMENTO, CALIFORNIA 95814  
(916) 443-8008

SAN FRANCISCO OFFICE

ONE EMBARCADERO CENTER  
SUITE 2201  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 434-4484

December 14, 1984

CITY PLANNING DIVISION

DEC 17 1984

RECEIVED

PLEASE ADDRESS REPLY TO

Sacramento

ALAN I. EPSTEIN  
ROBERT J. GERSH  
ROBERT A. KLEIN  
ALBERT C. HOUR  
PETER ARONSON  
CARL WEISSBURG  
RICHARD A. BLACKER  
WIN R. RICHEY  
JAY N. HARTZ  
PATRIC HOOPER  
MARK S. WINDISCH  
J. MARK WARMAN  
MICHAEL J. TICHON  
ROBERT W. LUNDY JR.  
KENNETH N. STERN  
CARL H. HITCHNER  
ROBERT D. SEVELL  
ELMER D. MARTIN, III  
MARSHALL R. FUSSE  
JOHN R. SPARKS  
RICHARD F. SEIDEN  
ROBERT M. DAWSON  
LLOYD A. BOJANNAN  
ROBERT B. MCCRAY  
MARK A. RADZIELSKI  
JAMES R. KALIVAS  
ROBERT J. ENDICOTT  
ANGELA A. MICHELSON  
JOHN R. MELLOW  
W. BRADLEY TULLY  
LAURIE R. KATZ  
ANITA D. LEE  
LINDA A. MILLS-COYNE  
JOEL H. GUTH  
JAY T. LEVITT  
PATRICIA BUCALO  
DOUGLAS S. CUNNING  
PETER N. GRANT  
MARIANNE DOZIER  
CRAIG T. CUDEN  
A PROFESSIONAL CORPORATION  
OF COUNSEL

HAND-DELIVERED

Ms. Diana Parker, Associate Planner  
City Planning Department  
927 Tenth Street, Suite 300  
Sacramento, California 95814

Re: Capitol/80 Properties Application:  
Comments on Draft Environmental Impact Report

Dear Ms. Parker:

Enclosed please find our comments on behalf of the  
Capitol/80 Properties applicant on the Draft 1984 South Natomas  
Community Plan EIR and Draft Capitol/80 Properties EIR  
(Attachment "A"), and the comments of TJKM Transportation  
Consultants on specific issues raised by the Draft Environmental  
Impact Reports (Attachment "B").

Please contact me if you have any questions regarding  
these comments.

Very truly yours,

*Robert B. McCray*  
Robert B. McCray

RMC:ckh:36 FF  
Enclosures

ATTACHMENT "A"

COMMENTS ON DRAFT 1984 SOUTH NATOMAS COMMUNITY PLAN EIR  
AND DRAFT CAPITOL/80 PROPERTIES EIR

Section C - Summary of Findings

Page C-2: Growth Inducing Impacts: The comment that "[c]ontinued urbanization in South Natomas would create greater pressure to develop in adjacent areas, particularly North Natomas," should be substantiated. It is certainly plausible that certain types of development in South Natomas will reduce development pressures in North Natomas by offering alternative and equally attractive sites for development. It might also be noted that if continued urbanization in South Natomas increases development pressures in the adjacent North Sacramento community, that will generally be perceived as a favorable effect.

Page C-3: Unavoidable Adverse Impacts: It should be noted that all six of the unavoidable adverse impacts identified will also occur, to some degree, under the existing South Natomas Community Plan.

Section D - Land Use

Page D-7: Mixed Dwelling Type Requirement: An additional adverse impact of the Draft 1984 SNCP is caused by its limitation on maximum average densities and the size of multi-family

clusters. By increasing the amount and therefore the cost of land required for each dwelling unit, the limitation on maximum densities may increase South Natomas housing costs. This factor may adversely affect the ability of persons employed in South Natomas to afford housing in that community.

Section G - Housing

Page G-4: Indirect Impacts: It appears that this section of the DEIR was taken directly from the Creekside Oaks/Gateway Centre DEIR. It does not address issues raised by the Draft 1984 South Natomas Community Plan.

Section I - Transportation

Page I-9: Impacts (Introduction): The DEIR notes that the traffic impact model failed to take out of direction travel into account. This is especially significant with regard to development activities on Northgate Boulevard near Interstate 80. The model assumes that all commuters to and from such development with destinations or points of origin to the south of the community will travel down Northgate Boulevard and through one or both of the most congested intersections in the community at El Camino Avenue and Garden Highway. It should be acknowledged that many, if not most, of such commuters would prefer to take a short out of direction drive and thus use Interstate 5 and Interstate 80 to reach their ultimate destination.

The DEIR uses existing City policy to determine that a significant adverse transportation impact occurs when traffic volume at an intersection exceeds the C level of service for however brief a time. While this assumption may or may not be required by law, it should be noted that in many urbanized jurisdictions, including the County of Sacramento, peak hour D levels of service are acceptable. This may be because higher urban densities generate increased traffic flow, and it is often prohibitively expensive to develop all traffic improvements to a point which is adequate to avoid a D level of service for even short periods of time on weekdays.

For further comments on transportation issues, please see the attached correspondence from TJKM Transportation Consultants.

#### Section J - Air Quality

All development in the region should participate in the implementation of measures identified in the 1983 Regional Air Quality Plan. In determining the impact that proposed South Natomas development will have on the goals identified in the Plan, the DEIR at Section J should take into account the fact that the DEIR at Appendix VII indicates that much of the proposed South Natomas development would occur elsewhere in the region if not approved for South Natomas. Hence, the effects on air

quality may occur even if the South Natomas area is not further developed.

#### Section K - Noise

Page K-5: Mitigation Measures: The DEIR should note that many persons believe noise barriers to be aesthetically displeasing. The DEIR should also consider the potential adverse effects of constructing dwellings in areas where special noise mitigation measures must be taken. The design consequences affect both individual dwellings and a development as a whole in matters such as the quantity and placement of windows, the location of bedrooms, exposure to indoor hazardous substances, etc. Requiring residences to be sealed and mechanically air conditioned affects energy consumption, lifestyle and marketability. Some noise mitigation measures will also add to the cost of construction.

It cannot be determined from the DEIR (including Appendix III) what Interstate 80 traffic volumes were assumed for purposes of preparing Exhibit K-6. Please clarify and identify the source of any base information used in preparing this assumption.

#### Section L - Energy

Page L-6: 13 Applications Alternative: The DEIR comments that the 13 applications would increase electricity demand and that

J-6  
(cont.)

I-12A

K-2

K-3

L-3



142 this would constitute a significant impact during peak load periods. It must be noted that the DEIR also indicates that the development proposed by the 13 applications would occur elsewhere in the region if not approved for South Natomas. Thus, the same effect would probably occur.

#### Section S - Cumulative Impacts

Page S-18: Indirect Impacts: The DEIR should justify the assumption that residential development which is "displaced" by South Natomas non-residential development would be developed at an average density of 6.6 units per acre. In light of rising housing costs, it appears that higher density residential development is more likely to occur, especially if it is to meet the needs of new Sacramento residents and workers, many of whom may not be able to afford single family dwellings. (See Section G.)

The DEIR should also address the beneficial effect which South Natomas development may have on the North Sacramento community. Specifically, as South Natomas reaches full build-out, North Sacramento may be increasingly attractive to residential developers. (See page G-5, second full paragraph.)

#### Appendix VII - Market Analysis

The analysis prepared by Keyser Marston Associates of the effect of South Natomas applications on regional MRD development states that South Natomas would capture a

L-3  
(cont.)

S-1

S-2

APPENDIX  
1

"significant portion of the Sacramento region's high technology demand" (page VII-9). In light of this finding, the DEIR should address the adverse environmental consequences which will occur if this MRD development occurs elsewhere in the region rather than in South Natomas, prior to addressing the significance of the adverse environmental effects of such development in South Natomas. Otherwise, the relative adverse effects of South Natomas development and the actual significance of the decision which must be made on the projects are unclear.

APPENDIX  
(cont.)

#### COMMENTS ON DRAFT CAPITOL/80 PROPERTIES ENVIRONMENTAL IMPACT REPORT

Note that the draft Capitol/80 Properties Environmental Impact Report repeats a number of assumptions and comments which were made in the Draft 1984 SNCP EIR and, in fact, incorporates the Draft 1984 SNCP EIR by reference. We have not repeated comments made on the Draft 1984 SNCP EIR. Rather, those comments, to the extent relevant, should be considered to be incorporated herein by this reference.

Section C - Summary of Findings

Other beneficial effects of the project include:

1. Potential increase in housing demand in North Sacramento, which would enhance that community's ability to meet the goals of its existing community plan.
2. Assuming the Keyser Marston analysis is accurate, South Natomas MRD development will help to decrease traffic and related problems elsewhere in the region.
3. Many people believe that an adequately landscaped office or MRD project is more attractive for freeway drivers than the sound walls necessary to buffer residential developments from freeway noise.

C-1  
CAP

C-2  
CAP

C-3  
CAP

Section I - Transportation

Please see the attached comments of TJKM Transportation Consultants. The most significant problem with the model used to determine transportation impacts of the Capitol/80 Properties project is its failure to take into account "out of direction" travel. In light of the close proximity of the project to Interstate 80, it is reasonable to expect that most employees bound for trip destinations to the south of the project will use Interstate 80 and Interstate 5 rather than driving south on Northgate Boulevard through West El Camino Avenue and/or Garden Highway. Therefore, it is apparent that the project will have lesser effects on the most congested intersections in South Natomas (maximum 5% traffic increase). The major traffic impact

I-1  
CAP

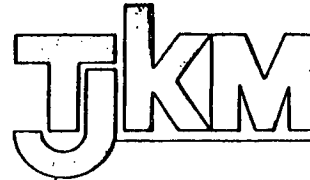
will be peak hour congestion occurring in the immediate vicinity of the project as employees leave for home, but this impact will be limited to the "New Street," and therefore will not affect many South Natomas residents.

Section K - Noise

It should be noted that the proposed MRD development of the properties is compatible with predicted year 2000 noise levels on the project site, while the residential development proposed by the 1984 SNCP would require special mitigation measures.

K-1  
CAP

22436R  
121484



TRANSPORTATION CONSULTANTS

PLEASANTON  
SACRAMENTO  
FRESNO  
CONCORD

December 13, 1984

Mr. Robert C. Cook  
Attorney at Law  
918 Second Street  
Old Sacramento, CA 95814

Dear Mr. Cook:

Per your request, we have analyzed the South Natomas Community Plan Update and Related Projects EIR: Volume 2: Supplemental EIR's for Eleven Projects (Capitol/80 Properties) and have identified three areas needing clarification. The areas are: the use of LOS D as an unacceptable LOS, the assignment of trips to the surrounding network, and the capacity deficient intersection analysis (Table I-4). Further discussion of each of these areas is included in the following sections.

The use of LOS D as an unacceptable intersection LOS appears to be unreasonable for a major metropolitan area like the City of Sacramento. Most major urban cities and counties, including Sacramento County, have accepted LOS D as an undesirable but acceptable LOS. In an urban area, designing intersections so that LOS C would be obtained during the peak hours is a costly goal. This is especially true since intersections are normally designed for the peak hour traffic loads (four hours a day) and at most other times of the day (twenty hours a day) the intersection would be operating at a better LOS; thus, even if an intersection is operating at a LOS D during the peak hours, it would only be doing so for a short period of the day and at other times the intersection would operate at a better LOS. While smooth vehicles flows are desirable, it must be balanced with the costs to obtain those flows for only a small period of the operating day.

I-2  
CAP

In the EIR, the CH2M Hill model assigned traffic from the project with origins or destinations south on I-5 along a route south on Northgate, west on Garden Highway or El Camino and then south on I-5. This does not seem to be the best route for trips using I-5 southbound. A better, faster, and less congested route would appear to be Northgate to I-80 to I-5. A reassignment of trips on this route would lessen the impacts to the West El Camino/Northgate and Garden Highway/Northgate intersections shown in the CH2M Hill Report.

I-3  
CAP

ATTACHMENT "B"

The capacity-deficiency intersection analysis (Exhibit I-4, page 49 of the EIR) shows six intersections in the South Natomas area that are projected to be impacted by the Capitol/80 Properties project. In that exhibit, the intersection of East Gateway Oaks Drive/West El Camino Avenue, is shown to be significantly impacted by the Capitol/80 project (+4 in the p.m. peak hour). This seems to be unreasonable based on its distance from the project. It is unlikely that traffic volumes from the Capitol/80's project would be that high in that area to cause this significant of an impact. Because of the reassignment of trips as described in an earlier section, impacts to the intersections of West El Camino/Northgate and Garden Highway/Northgate would be reduced from the +5 and +9 changes shown in Exhibit I-4. As for the other three intersections, West El Camino/northbound I-5 off-ramp, West El Camino/Azevedo and Garden Highway/Truxel, Exhibit I-4 shows the impacts from the project as not significant. For this reason, these intersections should not be included as capacity-deficient intersections due to impacts from the Capitol/80 Properties projected traffic.

I-4  
CAP

An analysis of the impacts of both the 1984 proposed community plan (Residential plus highway commercial) and 1984 proposed community plan with the proposed land use (MRD plus highway commercial) was completed. This reveals that, with the exception of the intersection of the New Street and Northgate Boulevard, impacts due to changes in land use to intersections surrounding the project are small (+5 percent). At the New Street and Northgate Boulevard the impacts due to the change in land use are more substantial, but only in the p.m. peak hour with traffic exiting the site impacting the New Street. This can be expected due to the more intense traffic peaking because of the MRD use. However, once this traffic has cleared, the New Street/Northgate intersection it mixes with traffic from other surrounding uses and its impacts tend to decrease, thus, the reduced difference between the MRD and Residential land use impacts on other intersections surrounding the site.

I-5  
CAP

We hope this information satisfies your needs. If you have any questions or need further study, do not hesitate to call.

Sincerely,

*Jeffrey E. Clark*  
Jeffrey E. Clark

JEC:wsr  
4133

# WEISSBURG AND ARONSON, INC.

ATTORNEYS AT LAW  
32ND FLOOR, TWO CENTURY PLAZA  
2049 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90007  
TELEPHONE (818) 877-2823  
TELECOPIER (213) 557-8475

## SACRAMENTO OFFICE

600 "H" STREET SUITE 400  
SACRAMENTO, CALIFORNIA 95814  
(916) 443-8005

## SAN FRANCISCO OFFICE

ONE EMBARCADERO CENTER  
SUITE 2201  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 434-4484

December 13, 1984

CITY PLANNING DIVISION

DEC 17 1984

RECEIVED

PLEASE ADDRESS REPLY TO

Sacramento

ALAN I. EPSTEIN  
ROBERT J. GERTS  
ROBERT A. KLEIN  
ALBERT C. MOHR  
PETER ARONSON  
CARL WEISSBURG  
RICHARD A. BLACHER  
WIN R. RICHEY  
JAY H. HARTZ  
PATRIC HOOPER  
MARK S. WINDISCH  
J. MARK WAXMAN  
MICHAEL J. TICHON  
ROBERT W. LUNDY JR.  
KENNETH M. STERN  
CARL H. HITCHNER  
ROBERT D. SEVELL  
ELMER D. MARTIN, III  
MARSHALL R. FUSSELL  
JOHN R. SPARKS  
RICHARD F. SEIDEN  
ROBERT H. DAWSON  
LLOYD A. BOUNNMAN  
ROBERT B. MCCRAY  
MARK A. RADZIELSKI  
JAMES R. KALTYVAS  
ROBERT J. ENDERS  
ANGELA A. MICHELSON  
JOHN R. HOLLOWAY  
W. BRADLEY TULLY  
LAUREN R. HATZ  
ANITA D. LEE  
LINDA A. MILLS-COYNE  
JOEL H. GUTH  
JAY T. LEVITT  
PATRICIA BUCALO  
DOUGLAS S. CUMMING  
PETER N. GRANT  
MARIAHNE DOZIER  
CRAIG T. CUOEN

\*A PROFESSIONAL CORPORATION  
OF CALIFORNIA

## HAND-DELIVERED

Ms. Diana Parker  
Associate Planner  
City Planning Department  
927 10th Street  
Sacramento, California 95814

Re: Community Hospital of Sacramento Application  
and Project at the Northwest Corner of (new)  
San Juan Road and Northgate Boulevard:  
Comments on Draft Environmental Impact  
Report

Dear Ms. Parker:

On November 13, 1984, we submitted comments on behalf of Community Hospital of Sacramento regarding the draft South Natomas Community Plan Revision (the "Blayne Proposal" or "1984 SNCP"). Specifically, we commented on that aspect of the Blayne Proposal which would redesignate approximately 2.5 acres of the office building site at the northwest corner of new San Juan Road and Northgate Boulevard from office use to low-density residential use. Rather than repeat the comments made in that correspondence, please consider them to be incorporated by this reference as comments on the Draft Environmental Impact Report (DEIR) on the South Natomas Community Plan Revision (1984 SNCP), and provide them to the DEIR consultant for inclusion in the final Environmental Impact Report.

The following comments relate to the DEIR for the Community Hospital project. As you will see, they also address certain issues related to the total development project proposed by Community Hospital of Sacramento, which includes a 100-bed hospital plus a 56,000 square foot medical office building. The revised site plan for this combined project is attached to my November 13, 1984, correspondence as Exhibit "C".

Ms. Diana Parker  
December 13, 1984  
Page 2

C. Summary of Findings

Page 6, Growth Inducing Impacts.

The comment that the hospital project encourages additional non-residential development in South Natomas lacks factual substantiation. It is more likely that the hospital project would encourage additional residential development because it will provide services which are necessary and desirable to residents of the area.

C-1  
CH

The comment that the project "continues the precedent of amending the 1978 SNCP on a project-by-project basis", and the comment that the hospital project "displaces planned on-site housing to other areas of the city", ignore the fact that the 1984 SNCP, as proposed, designates the hospital site for hospital development. The hospital project has been included in the 1984 SNCP revision precisely to avoid continuation of community plan amendments on a project-by-project basis. Furthermore, the 1984 SNCP increases rather than decreases the projected population of the South Natomas community.

C-2  
CH

Page 6, Unavoidable Adverse Impacts.

The hospital project is not inconsistent with the 1984 SNCP, nor is inconsistency per se an "adverse impact." From a community perspective, the substitution of a hospital/medical office building project for residential/general office development is considered beneficial, not adverse. The accompanying community plan revision would therefore also be considered positive.

C-3  
CH

The conclusion that the project contributes to traffic congestion and unacceptable levels of service, is addressed below.

C-4  
CH

Page 7, Summary Of Environmental Impacts, etc.

The summary of findings indicates that the project would increase traffic and contribute to unacceptable levels of service at four intersections in South Natomas, in addition to Interstate 5 itself. These statements are not supported by the DEIR's discussion of transportation issues. (Page 39, et seq.)

C-5  
CH

Ms. Diana Parker  
December 13, 1984  
Page 3

As to the Interstate 5 impact, the DEIR states:

"While this is a significant adverse impact, the condition is not attributable to the proposed Community Hospital project since essentially the same condition exists under the 1978 plan alternative." (Page 42.)

C-5  
CH  
Cont.

This comment is equally applicable to the four intersections.

Furthermore, with respect to the four intersections identified in the Summary of Findings, a review of Exhibit I-4 at page 44 of the DEIR indicates that the project reduces rather than increases the traffic at the West El Camino/northbound I-5 off-ramp, West El Camino/Northgate Boulevard, and in the a.m. peak hour at East Gateway Oaks Drive/West El Camino Avenue, and that the largest increase in traffic is 3% in the p.m. peak hour at the last named intersection. It appears that the last finding must be incorrect in that the hospital will produce a total number of trips which is approximately 2% of the p.m. peak hour trips through the intersection, which is several miles distant from the hospital (see further discussion below).

C-6  
CH

D. Land Use

Pages 13 to 14, Impacts.

The DEIR comments that the hospital project may detract from the residential character of development to the north and west of the hospital project. It should be noted that the 1984 SNCP, with its reduction of the space available for the hospital and medical office building project, would increase, rather than decrease, this possibility. If any reduction in land available for the combined project is made, that reduction should be at the north end of the parcel rather than at the southerly end adjacent to San Juan Road, as proposed by the 1984 SNCP.

D-1  
CH

Page 15, Relationship of Project to Relevant Land Use Plans and Policies.

The DEIR comments that the hospital project would be "inconsistent with the general intent of the 1978 SNCP to develop South Natomas primarily as a residential community close to the CBD, since the project displaces planned residential uses; . . . ." This statement is wrong in that under the 1978 SNCP, the residents of the South Natomas community would continue to

D-2  
CH

Ms. Diana Parker  
December 13, 1984  
Page 4

travel outside of their community for medical services. Clearly, this is an undesirable condition. Therefore, the displacement of a small number of residential dwellings, which can be "recouped" to the South Natomas area (as demonstrated by the 1984 SNCP), is offset by the beneficial aspects of the project.

Page 17, Mitigation Measures.

Note that the site plan for a combined hospital and medical office building project deletes the secondary side entrance on Larchwood Drive. It should be further noted, however, that the Sacramento City Fire Department may request inclusion of at least one emergency access from Larchwood Drive.

I. Transportation

Page 39 et seq., Impacts.

The DEIR does not support the statement on page 42 that the hospital project would have a significant impact on six listed intersections in South Natomas.

First, as the DEIR notes at page 39, when compared with the 1978 SNCP, the hospital project will add only 10 peak hour trips to the a.m. and p.m. periods, and some of these trips will occur earlier than the peak traffic hours for other land uses. A review of Exhibit I-1 and I-2 indicates that these ten additional trips constitute far less than 1% of the total peak hour volumes at any of the six listed intersections. For example, Exhibit I-1 indicates that in the year 2000, a.m. peak hour trips through the West El Camino/Gateway Oaks intersection will number approximately 4,890. Even if all ten additional trips associated with the hospital project were to travel through that intersection (a most unlikely state of events, since that intersection is on the other side of Interstate 5, and several miles distant from the hospital), it is clear that the additional trips could not significantly adversely affect traffic at that intersection. In this regard, it is important that the DEIR indicates that the hospital project will not adversely affect any of the intersections in the immediate vicinity of the project (Northgate Boulevard/San Juan Road, San Juan Road/Truxel, Northgate Boulevard/New road). Exhibit I-4 recognizes this fact when it states:

D-2  
CH  
(cont.)

D-3  
CH

I-1  
CH

Ms. Diana Parker  
December 13, 1984  
Page 5

"This project does not significantly contribute to the capacity deficiency of [five of the six listed intersections]."

The only intersection which is not included by this statement is the East Gateway Oaks Drive/West El Camino Avenue, which should be the least affected intersection.

Second, Exhibit I-4 indicates that the hospital project will reduce traffic volumes at several listed intersections, and that two of the listed intersections are not capacity-deficient during the time period included in the DEIR.

Third, when considering the combined hospital/medical office building now proposed by Community Hospital and comparing it with the 1978 and 1984 SNCPs, it is clear that the combined project will produce less peak hour traffic than either of those alternatives. Attachment "A" hereto demonstrates that, using the DIER's trip generation rates, the hospital/medical office building project would produce 413 peak hour trips each day, compared with 422 peak hour trips under the 1984 SNCP, and 493 peak hour trips under the 1978 SNCP. Thus, the hospital/medical office building project decreases total traffic in the South Natomas community, and enhances rather than detracts from the environmental quality of the area.

Thank you for your consideration of these comments. If you have any questions regarding these comments, please contact me.

Very truly yours,

*Robert B. McCray*  
Robert B. McCray

RMC:ckh:36A

I-1  
CH  
(cont.)

I-2  
CH

I-3  
CH

ATTACHMENT "A"

COMMUNITY HOSPITAL OF SACRAMENTO  
TRAFFIC ANALYSIS

		1978 SNCP <sup>1</sup>	1984 SNCP <sup>2</sup>	CHS PROPOSAL <sup>3</sup>
<u>HOSPITAL SITE:</u>	A.M. Trips <sup>4</sup>	80	90	90
	P.M. Trips <sup>4</sup>	100	110	110
<u>OFFICE SITE:</u>	A.M. Trips <sup>5</sup>	181	124	123
	P.M. Trips <sup>5</sup>	132	98	90
<u>TOTALS:</u>		<u>493</u>	<u>422</u>	<u>413</u>

1. 1978 SNCP designates the hospital site for residential development and the 6.6 acre OB site for general office development, which is assumed to develop at 12,500 GSF per acre.
2. 1984 SNCP designates approximately 14 acres for hospital use and approximately 2.5 acres for low density residential use at maximum 7 units per acre.
3. CHS proposes a 100-bed hospital plus a 56,000 GSF medical office building in the combined hospital and office site of approximately 16.6 acres.
4. The CHS DEIR is the source of this information.
5. Trips calculated by multiplying assumed total permitted or requested office square footage by trip generation rates (inbound and outbound) identified in Exhibit I-4 of the DEIR for the draft 1984 SNCP. Under assumed build-out of 12,500 GSF per acre, the 1978 SNCP permits 82,500 GSF in 6.6 acres, and the 1984 SNCP permits 50,000 GSF in 4 acres, along with 18 dwelling units on 2.6 acres. CHS has presented a proposal for 56,000 GSF. Hence:

1978 SNCP: 82,500 GSF Ofc = 181 A.M. + 132 P.M. Peak Hour Trips  
 1984 SNCP: 50,000 GSF Ofc = 110 A.M. + 80 P.M. Peak Hour Trips  
 Plus 18 DU = 14 A.M. + 18 P.M. Peak Hour Trips  
 124 A.M. + 98 P.M. Peak Hour Trips

CHS  
 PROPOSAL: 56,000 GSF Ofc = 123 A.M. + 90 P.M. Peak Hour Trips

RMC:ckh:36A

WEISSBURG AND ARONSON, INC.

ATTORNEYS AT LAW  
 32ND FLOOR, TWO CENTURY PLAZA  
 8049 CENTURY PARK EAST  
 LOS ANGELES, CALIFORNIA 90067  
 TELEPHONE (213) 877-2223  
 TELECOPIER (213) 887-0476

ALAN I. EPSTEIN  
 ROBERT J. GERTS  
 ROBERT A. KLEIN  
 ALBERT C. HOUR  
 PETER ARONSON  
 CARL WEISSBURG  
 RICHARD A. BLACKER  
 WINN R. RICHIEY  
 JAY N. HARTZ  
 PATRIC HOOPER  
 MARK S. WINDSCH  
 J. MARK WAGMAN  
 MICHAEL J. TICHON  
 ROBERT W. LUNDY JR.  
 KENNETH M. STERN  
 CARL H. HITCHNER  
 ROBERT D. SEVELL  
 ELMER D. MARTIN III  
 MARSHALL R. FUSS  
 JOHN R. SPARKS

RICHARD F. SEIDEN  
 ROBERT M. DAWSON  
 LLOYD A. BOOHMAN  
 ROBERT B. MCCRAY  
 MARK A. HADZIELSKI  
 JAMES R. HALVAKS  
 ROBERT J. ENDERS  
 ANGELA A. NICKELSON  
 JOHN R. HOLLOW  
 W. BRADLEY TULLY  
 LAURIE R. HATZ  
 ANITA D. LEE  
 ERICA A. HILLS-COTNEY  
 JOEL M. GUTH  
 JAY T. LEVITT  
 PATRICIA BUCALO  
 DOUGLAS S. CUMMING  
 PETER N. GRANT  
 MARIANNE DOZIER  
 CRAIG T. CLUDEN

\*A PROFESSIONAL CORPORATION  
 OF CALIFORNIA

November 13, 1984

CITY PLANNING DIVISION  
 DEC 06 1984  
 RECEIVED

SACRAMENTO OFFICE  
 660 "J" STREET, SUITE 480  
 SACRAMENTO, CALIFORNIA 95814  
 (916) 443-8008

SAN FRANCISCO OFFICE  
 ONE EMBARCADERO CENTER  
 SUITE 2201  
 SAN FRANCISCO, CALIFORNIA 94111  
 (415) 434-4484

PLEASE ADDRESS REPLY TO

Sacramento

Members In Session  
 Sacramento City Planning Commission  
 927 10th Street  
 Sacramento, California 95814

Re: Community Hospital of Sacramento  
 Application and the Northwest Corner  
 of (new) San Juan Road and Northgate  
 Boulevard

Dear Members:

This firm represents Community Hospital of Sacramento (CHS), which has assembled three parcels at the northwest corner of (new) San Juan Road and Northgate Boulevard for the purpose of constructing a 100-bed general acute care hospital, along with a medical office building (MOB) of approximately 56,000 square feet. (See area highlighted in yellow on Exhibit A.) While the Hospital certainly supports the draft South Natomas Community Plan Revision (the "Blayne Proposal") insofar as it would permit the construction of a hospital at this site, CHS believes it very unwise to redesignate approximately 2.5 acres of the southwestern portion of the site for low density residential uses. (See area highlighted in pink on Exhibit A.)

Background

CHS is a 100-bed general acute care hospital located at the corner of Hawthorne and Grove Streets. Its physical plant, which is up to thirty-five years old, is medically obsolete and does not conform to current seismic safety standards for hospitals. Therefore, the hospital must be replaced. However, the existing location is too small and isolated to allow or justify reconstruction on site.

A-1  
 CH

Members In Session  
November 13, 1984  
Page 2

The proposed site on Northgate Boulevard is approximately one-half mile south of Interstate 80, at the northwest corner of (new) San Juan Road and Northgate Boulevard. Referring to Exhibit B hereto, the designated Parcels 1 and 2 are approximately five acres apiece, are currently zoned R-3, and together constitute the site on which CHS initially proposed relocation of its hospital. On that basis, CHS applied for a Community Plan amendment of Parcels 1 and 2, from R-3 to H.

Subsequently, the adjacent parcel to the south became available. See Exhibit B, Parcel 3. This 6.62-net-acre site is designated in the 1978 Community Plan for office building uses. CHS is purchasing this site for the purpose of constructing a medical office building which will be architecturally and medically harmonious with the hospital. The initial site plan for the development of the combined hospital/MOB site is attached as Exhibit C.

#### The Blayney Proposal

The Blayney Proposal would designate approximately 14 acres of the combined 16-plus-acre site for hospital uses. The primary justification for this aspect of the Blayney Proposal is that the Northgate Boulevard site will permit the hospital to serve both the North Sacramento and South Natomas communities. The CHS Administrator, Catherine Mahan, has found this point to be well received in numerous community meetings (approximately twenty) in North Sacramento and South Natomas.

However, the Blayney Proposal would also redesignate the westerly 2.5 acres of the currently zoned OB site to low density residential uses. (See Exhibit B.) No specific justification for this aspect of the Blayney Proposal is offered. Presumably, the reduction in office zoning is based on the consultant's general desire to limit the amount of commercial development in the South Natomas community. We believe, however, that this concept is misapplied to the MOB site. This aspect of the Blayney Proposal would have several adverse consequences, including an increased likelihood of conflicts between the hospital project and neighboring residential uses, without any offsetting benefits.

A-1  
CH  
(cont.)

Members In Session  
November 13, 1984  
Page 3

#### Discussion

We can ascertain no benefits which might arise from the redesignation of a portion of the MOB site. Under the Blayney Proposal, the maximum density of low-density residential development is 5.6 units per acre. Hence, up to fourteen dwellings could theoretically be constructed on the consultant's 2.5-acre site. However, CHS is not in the business of building homes, and it is not likely that any residential developer would find this small parcel to be attractive for residential development, bounded as it will be on two sides by a hospital and MOB complex. Furthermore, the Blayney Proposal is not necessary if the true motivation is to decrease the general density of development in the area. CHS proposes initially to construct a hospital building of approximately 86,000 gross square feet and an MOB of approximately 56,000 gross square feet. This is far less than the maximum feasible development of the 16-plus-acre site. One of the advantages of the site is that it will allow CHS to carry out its plans, with reasonable room for moderate future expansion, while maintaining adequate unpaved open spaces to buffer neighboring development and to increase the attractiveness of the project.

The Blayney Proposal has several serious drawbacks. First, the Blayney Proposal would aggravate existing limitations on the use of the combined hospital/MOB site. An examination of Exhibits B and C indicates that the site already has a significant amount of unusable space because of the panhandle at its north end, and the odd shape of its west side. The site plan tries to make reasonable use of these defects as areas which will buffer neighboring residential development. Furthermore, the site plan makes use of a perimeter driveway which will permit emergency access from both Northgate Boulevard and new San Juan Road and which is separate from the primary access points to on-site parking areas. This dedicated emergency access would be rendered impossible by the Blayney Proposal.

Second, the loss of a significant portion of the MOB site would limit the hospital's expansion opportunities. Admittedly, the initial hospital building and MOB will not require all of the combined site. However, it is important to allow reasonable room for moderate future expansion of the original buildings, with accompanying increased parking requirements. The CHS site plan is designed with this possibility in mind.

A-1  
CH  
(cont.)



Members In Session  
November 13, 1984  
Page 4

Third, reducing the hospital/MOB site would make conflicts with neighboring residential uses more likely. The site plan allows adequate buffering of residences on the north and west. The Blayney Proposal would result in the elimination of much of these buffer zones. In order to avoid future disputes in South Natomas similar to those recently experienced by expanding hospitals and residential neighbors in the downtown and east Sacramento areas, the proposed reduction of the hospital/MOB site should be rejected.

#### Conclusion

In summary, the CHS proposal for the combined hospital/MOB site offers the promise of attractive development with reasonable opportunity for expansion and the avoidance of future conflicts with its neighbors. The development will be medically sound and will thus permit CHS to meet local needs in the North Sacramento and South Natomas communities.

Therefore, we request that either of the two following actions be taken:

1. Adopt the Blayney Proposal, but include the entire office building site (Parcel 3 of Exhibit B, in the H Zone); or
2. Maintain the current OB zoning on Parcel 3 of Exhibit B, and adopt the H Zone for the remaining ten acres (Parcels 1 and 2 of Exhibit B).

Thank you for your consideration of this matter.

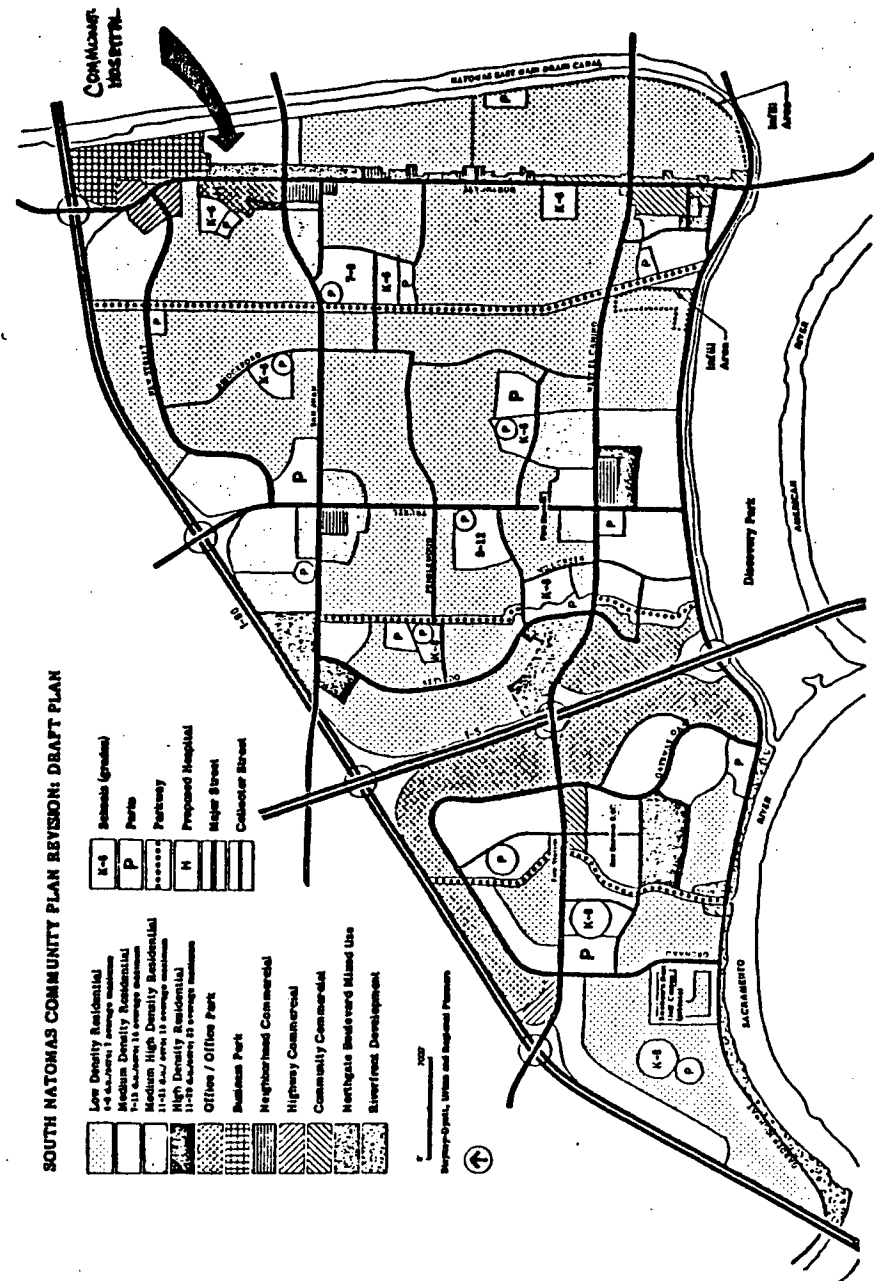
Very truly yours,

*Rob McCray*  
Robert B. McCray

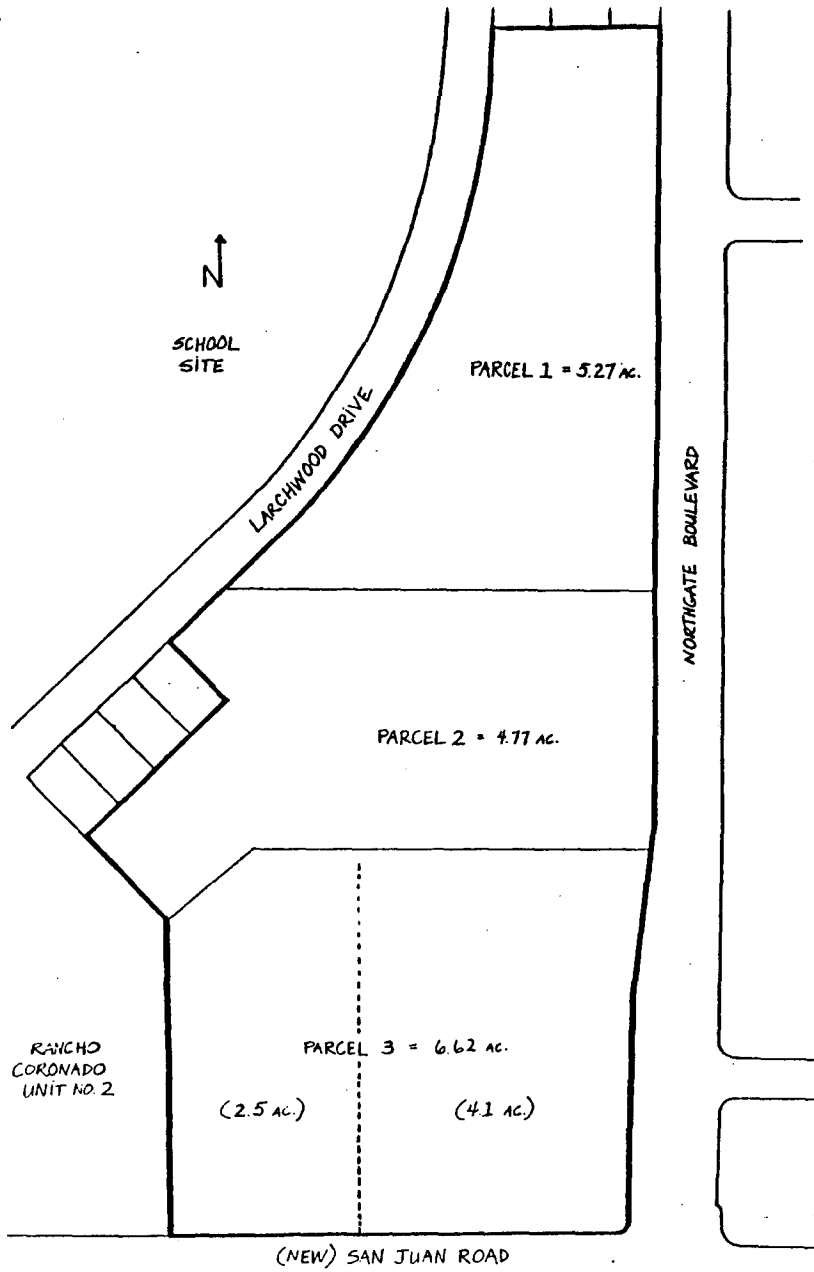
RMC:ckh:35EE  
Attachments

cc: Mr. Marty Van Duyn  
Mr. Mike Lake  
Mr. John Blayney

A-1  
CH  
(cont.)

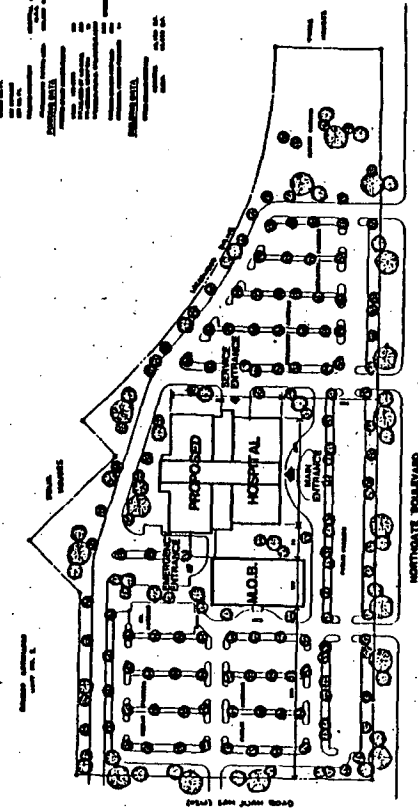


151



PROJECT INFORMATION

DATE	10/15/88
BY	W. J. B.
FOR	COMMUNITY HOSPITAL OF SACRAMENTO
PROJECT NO.	151
PROJECT NAME	COMMUNITY HOSPITAL OF SACRAMENTO
PROJECT ADDRESS	151 NORTHGATE BOULEVARD
PROJECT CITY	SACRAMENTO, CALIF.
PROJECT STATE	CALIF.
PROJECT ZIP	95811



SITE PLAN

ARCHIE HEFNER INC \*  
 ROBERT H. STARK  
 THEODORE W. MARSH JR.  
 JAMES H. WOODS-DE  
 JOHN D. BESSET  
 ROBERT H. BELL  
 RICHARD H. PARR  
 KENNETH B. STONE  
 TIMOTHY D. TAYLOR  
 JUDY H. CAMPOS  
 WILLIAM H. GALLAGHER  
 ROBERT S. WILLETT

TIMOTHY H. CROWAN  
 RAY C. THOMPSON  
 RANDY C. IRVINE  
 JOEL S. LEVY  
 TODD A. HUBBARD  
 ROBERT A. LAURIE  
 PEGGY J. CHATER  
 JAMES H. DAVIS  
 RONALD H. SARGIS  
 DAVID H. LEVINE  
 MARTIN B. STEINER

\* A PROFESSIONAL CORPORATION

LAW OFFICES OF  
**HEFNER, STARK & MAROIS**  
 FOURTEENTH FLOOR PLAZA TOWERS  
 888 CAPITOL MALL  
 SACRAMENTO, CALIFORNIA 95814  
 TELEPHONE (916) 444-6820

December 6, 1984

HUGH B. BRADFORD (1876-1888)  
 S. W. CROSS (1881-1958)

EL DORADO COUNTY OFFICE  
 2230 CAMERON PARK DRIVE  
 CAMERON PARK, CALIFORNIA 95602  
 (916) 877-0245

☐ PLEASE REPLY TO EL DORADO  
 OFFICE IF THIS BOX IS CHECKED

**COMMENTS ON VOLUME I DRAFT 1984 COMMUNITY  
 PLAN EIR AND THE RIVERVIEW OAKS PORTION OF  
 VOLUME II: SUPPLEMENTAL EIRS FOR ELEVEN PROJECTS**

Ms. Diana Parker  
 Associate Planner  
 City of Sacramento  
 City Planning Department  
 927 Tenth Street, Suite 300  
 Sacramento, CA 95814

Re: Draft Environmental Impact Report for South Natomas  
 Community Plan Update - Reviewview Oaks

Dear Diana:

Enclosed please find our comments from proponents of the  
 Reviewview Project as they relate to the subject DEIR.

Respectfully submitted,

HEFNER, STARK & MAROIS

By *R. S. Willett*  
 Robert S. Willett

RSW:mw

Enclosures

GENERAL COMMENTS ON VOLUME I: In our opinion, Volume I is fairly comprehensive as it relates to the environmental issues arising out of the proposed 1984 South Natomas Community Plan. We have no quarrel with the discussions in the EIR except to those matters which relate to the Riverview Oaks property which indicates the use of the property for residential purposes. We simply note our opposition to Volume I at this point since it is practically impossible to separate from the entire Volume a small acreage such as Riverview Oaks and intelligently comment on the balance of the discussion.

COMMENTS RE: RIVERVIEW OAKS: The balance of our comments will relate solely to the Riverview Oaks portion of Volume II which includes the Supplemental EIRs for the eleven projects. For ease in identification, we cite the appropriate section and page to which our comments are directed.

INTRODUCTION (Section A, Page 1):

No comment.

PROJECT DESCRIPTION (Section B, Page 3-4):

No comment.

SUMMARY OF FINDINGS (Section C, Pages 5-11):

On Page 6, the preparers determined that there are four unavoidable adverse impacts, namely, (1) conversion of 37 acres of

A-4

C-1  
 RVO

prime farm land to urban use; (2) inconsistency with existing plans and policies; (3) contribution to traffic congestion and unacceptable levels of service; and (4) obstruction of views from riverfront area and parkways.

Comment:

We understand that CEQA Guidelines require the identification of unavoidable adverse impacts; we disagree that those disclosed are in fact unavoidable or even adverse. Although the Guidelines suggest that the conversion of prime farm land to urban use be discussed as a significant effect, we believe that discussion must be taken in its proper context. The subject site is proposed to be surrounded by residential and other urban uses which if said uses were actually implemented would make it extremely difficult to use the subject site for agricultural purposes. The Draft EIR further discloses that the Riverview Oaks proposal is inconsistent with existing plans and policies which identify the subject site for residential purposes. We think it should be noted that the existing 1978 South Natomas Community Plan policies and plans are themselves inconsistent with the conversion of prime agricultural land to urban uses. Further, any use of the land will contribute to some degree to the traffic congestion. As will be discussed later, we take issue with the conclusion that this particular project contributes to traffic uses to the level of an unavoidable adverse impact. Also, the suggestion that the project will obstruct views "from riverfront area and parkways" without more certainty cannot be considered adverse as an impact.

C-2  
RVO  
C-3  
RVO  
C-4  
RVO

C-1  
RVO

C-2  
RVO

C-3  
RVO

C-4  
RVO

On page 18, the DEIR states that the project is potentially inconsistent with the character of the Riverfront District to the south. As is further discussed in our comments regarding aesthetics, we do not concur with this view. In addition, the DEIR states that the project conflicts with the draft 1984 SNCP in that it would "block views of the Sacramento River". Given the location of the project, we can see no way in which this project blocks any views of the river. Indeed, it creates tremendous views of the river for the occupants and users of the structure.

LAND USE (Section D, Pages 13-20):

Apparently the preparers have determined that if a project as proposed is inconsistent with an existing community plan or goals or policy, then the project ipso facto has a potential significant effect on the environment. We perceive such a comparison of existing plans and policies with newly proposed plans and policies as land use rather than environmental issues. We are aware that City Staff takes the position that Appendix G to the CEQA and EIR Guidelines suggests that projects proposed which are inconsistent with existing goals of the community should be declared significant environmental impacts. We disagree with that interpretation. It would be interesting whether the Staff would find that a significant environmental impact is disclosed if the project proponent was to offer the subject site as permanent open space as opposed to the project actually proposed. In both instances the proposal would be inconsistent with existing plans and community goals.

POPULATION (Section E, Pages 21, 22):

No Comment.

C-4  
RVO  
(cont.)

D-1  
RVO

EMPLOYMENT (Section F, Pages 23-25):

No comment.

PUBLIC FACILITIES AND SERVICES (Section H, Pages 31-42):

1. Water. No comment.
2. Sewer. No comment.
3. Solid Waste Management. No comment.
4. Fire. No comment, except to agree that any specialized equipment, if required at all, should be equitably assessed against all users whether such users be located in the South Natomas or elsewhere in the City. The DEIR fails to disclose whether existing equipment in the City can service the Riverview Oaks site.
5. Police. No comment.
6. Parks. The preparers take the position that the multi-story buildings proposed would aesthetically impact the recreation quality of the undeveloped parkside to the east and the Sacramento River and planned main canal parkway to the west. As will be discussed under the subject of aesthetics later, we believe the EIR overstates dramatically the impact of the building on the recreational quality of the area. The project as proposed will be extensively landscaped throughout with considerable peripheral landscaping. The suggestion that simply because the project may be ten stories high will impact recreation quality is without any evidence whatsoever in the EIR. The property to the north of the project is proposed as high density residential and as we discuss infra, the site

H-1  
RVO

H-2  
RVO

is surrounded on the west and the south by commercial and semi-industrial uses. Further, as a matter of principle, we disagree that the loss of funds for park purposes by conversion of residentially planned property to a non-residential use has an adverse impact on the physical environment. The EIR should fully discuss in what respect such a loss of financing because of a change in use constitutes an environmental impact on the physical environment.

H-3  
RVO

7. Schools. No comment.

8. Libraries. No comment.

TRANSPORTATION (Section I, Pages 43-54):

The DEIR, though very comprehensive, still does not treat the positive transportation impacts of the project as having a place in the analysis. Specifically, a jobs/housing balance increase caused by the project will reduce the demand for external travel from the South Natomas community and allow traffic reductions across key portals at the community boundary.

I-1  
RVO

Secondly, the intersection analysis suggests negative impacts due to the project which, on reflection, are not as severe as may first be thought. Your attention is drawn to the Exhibits I-3, and I-4 on pages 46 and 47 of the draft EIR, volume 2, Riverview Oaks section, and also the summary table shown on p. 7 of the same section.

I-2  
RVO

In the summary table, on p. 7, four intersections and one section of the freeway are listed as locations where "the project would increase traffic and contribute to unacceptable levels of

I-3  
RVO

service (incapable of feasible mitigation)..."

Dealing with each location, as listed in turn:

1. W. El Camino Avenue/Northbound I-5 Interchange. This intersection changes its degree of saturation by +3% and -2% in the morning, and evening peak. These changes are not significant.

2. W. El Camino Avenue/Northgate Boulevard.

Here the change in degree of saturation is even less, +1% and -1% in the morning and evening peaks, respectively. Exhibit I-4 notes that this project does not contribute significantly to the capacity deficiency of the intersection, though it also notes that the project does contribute to the cumulative traffic.

3. Garden Highway/Northbound I-5 ramps.

The project here adds 9% to saturation levels in the morning peak. However, the levels of service expected at that time are A or B, both adequate levels. In the evening peak, the 7% increase in the saturation level due to the project still leaves the service level at D, the service level of the South Natomas Community Plan. Furthermore, we feel that there are additional mitigations that can be provided at that intersection, which will improve the service levels.

4. Garden Highway/Northgate Boulevard.

The project adds 6% and 7% in the morning and evening peaks, respectively. However, this intersection is significantly overloaded in the evening peak, with a degree of saturation about 200%, i.e., the demand is twice the supply. An addition of 7% on 200% seems very small, to the point of insignificance. If the overload is so major, with or without the Riverview Oaks Project, and additionally the Arden - Garden connector is to be built, it is clear that this intersection requires substantial mitigations, such as

I-4  
RWO

I-5  
RWO

I-6  
RWO

I-7  
RWO

a grade separation.

5. I-5 Mainline.

This section of freeway, presumably at the location of the American River south of the Garden Highway, is referred to in the text of the DEIR on p. 48 where it says:

"...the condition is not attributable to the proposed Riverview Oaks project since essentially the same condition exists under the 1978 Plan alternative."

It seems to us that reading the summary table alone, a decision that most readers may take, given the size of the documents, could lead the reviewer to believe that the impacts of the project are much more significant than they may first appear. Our reading indicates that of the five locations listed in the summary table, p. 7, at intersections where the Riverview Oaks project would increase traffic and contribute to unacceptable levels of service, three locations are significantly changed when compared to the SNCP Alternative, one intersection requires substantial mitigation without the project, and the final intersection levels of service remain in "D" with or without the project, and could be further mitigated.

AIR QUALITY (Section J, Pages 55-58):

The DEIR states that the emission increases due to the project are minor but that current regional ozone problems are a result of incremental minor emission increases such as those which the DEIR attributes to the project. First of all, to the extent that the traffic analysis in the DEIR supports the finding with respect to air quality, we differ as noted above in our comments to Section I. In addition, it is interesting to note that the DEIR in the section

I-8  
RWO

I-9  
RWO

J-1  
RWO

on employment states that, in evaluating whether or not there are beneficial impacts from this project, employment generated by this project would probably happen anyway in the Sacramento area and approval of the project merely relocates the employment created. If indeed that is true, then there is no increased emission problem caused by this project.

NOISE (Section K, Pages 59-60):

No comment.

ENERGY (Section L, Pages 61-62):

No comment.

GEOLOGY AND SOILS (Section M, Pages 63-64):

The EIR discloses that there is no mitigation for loss of 37 acres of prime agricultural land. We believe the EIR should further disclose that if the 1978 Plan or the proposed 1984 Plan is implemented, the loss of prime agricultural land will eventually take place. Further, it is highly doubtful that the property would be commercially farmed in view of the proposed surrounding urban uses.

HYDROLOGY, DRAINAGE, AND WATER QUALITY (Section N, Pages 65-68):

No comment.

BIOLOGY (Section O, Pages 69-72):

No comment.

AESTHETICS (Section P, Pages 73-74):

The proponents of the proposed Riverview Oaks project take strong exception to the position that the proposed project would adversely affect the aesthetics of the site and the surrounding area. Indeed, it is the proponents' belief that a well designed office building in this location, in proximity to the Sacramento

J-1  
RVO  
(Cont.)

M-1  
RVO

P-1  
RVO

River, would, in fact, enhance the aesthetics of the area and be wholly consistent with the historical and future nature of the development along the Sacramento River.

The DEIR in the section dealing with land use, parks and especially aesthetics, refers to the height of the building as an adverse impact which could be reduced to a less than significant effect if the height of the building was reduced. The DEIR states, among other things, that the height of the structure could adversely affect the view from "Garden Highway and the Riverfront District". It is difficult for us to understand the manner in which this project would affect such views. While it is true that, under the present use of the land, the view from Garden Highway would be a mix of development underway, the freeway and some open space agricultural lands, under both the 1978 SNCP as amended and under the 1984 draft SNCP, the view from Garden Highway would be the roof tops of single family residences on the site, the roof tops of multi family units on nearby parcels, and a mix of other urban uses, such as office buildings.

With respect to the views from the Riverfront District, we do not concur that this project would adversely affect that view. Under the present land uses and the proposed SNCP, the view from the Riverfront District to the north would be the levee and the trees along the levee. While the project would be somewhat visible, there is no basis in fact for stating that a well designed office building would be a detriment to the urban landscape. While we believe the comments on visual impact are in general inappropriate, we wish to note that the DEIR fails to disclose

P-1  
RVO  
(Cont.)

P-2  
RVO

P-3  
RVO

visual impacts in the immediate vicinity of the site including an existing boat facility on filled land (directly to the west of the site) which is at the same level as the top of the levee and the nearby McClellan Dock area.

In evaluating the visual effects of this building in relationship to the Sacramento River, the DEIR should recognize not only the historical nature of that river but also current uses and planning efforts underway along that river with which this office building is wholly consistent.

In the earliest days of this City's development, the Sacramento River was a commercial hub. Unlike the American River, which has by policy been preserved in an open space character, the Sacramento River has always been an urban river which was used historically for commercial shipping purposes and today supports a great deal of activity. Indeed there are a variety of urban uses including highrise buildings (i.e., the 19 story Capitol Bank of Commerce building, crop storage silos), are visible to boaters plying the Sacramento River.

In addition, it is important to note that, as the DEIR is considered, there are tremendous efforts being undertaken along the riverfront by the City of Sacramento itself to enhance the commercial nature of the river. The Sacramento Housing and Redevelopment Agency is rebuilding the historical wharf and will be mooring to that wharf several large ships which will be used for commercial and entertainment purposes. The City is preparing to develop the Docks Area south of the Tower Bridge with a potential mix of commercial and residential uses.

Further, it is our understanding that the City is proposing a dramatic expansion of the marina in Freeport to accommodate the increased demand by boaters for access to the river. Of direct interest to this project is the fact that the City has approved the Riverfront Holding Company's development directly to the south of the project which includes an extensive marina, condominium development and restaurant complex. Beyond these existing or proposed uses on the Sacramento side of the river, it should be additionally noted that Yolo County has been actively considering a range of intensive uses of abutting the Sacramento River.

When taken in the context of the variety of activities now being planned by public agencies themselves and by private interests (with public approvals), the Riverview Oaks project is wholly consistent with efforts to make the Sacramento River a focal point of urban development.

CULTURAL RESOURCES (Section Q, Page 75):

No comment.

HOUSING (Section G, Pages 27-29):

No comment.

P-3  
RVO  
(cont.)

P-3  
RVO  
(cont.)



# PUBLIC HEARING COMMENTS

A public hearing to receive comments on the Draft EIR by the City of Sacramento Planning Commission and the public was conducted on Thursday evening, December 6, 1984. A summary of the comments received follows:

Gene Robinson  
City Department of Parks and Community Services

Capital Business Park. A community park is desirable at that location. It would serve a radius reaching beyond the project site. A community park is compatible with office and commercial land uses.

H-1  
C&P

Fong Ranch. Half of a neighborhood park site has already been acquired by the City on property to the west. The other half of the acreage will need to come from the Fong Ranch site.

H-1  
FR

Mercy Natomas. An additional easement for a bikeway and parkway corridor will be needed along the western perimeter of the project site.

H-1  
MH

Natomas Corporate Center. The City would acquire the Bannon Slough Parkway and oak preserve as a dedication not an easement.

H-1  
NCC

Steve Cates  
ECOS

Comments submitted in writing.

South Natomas Community Association

Comments submitted in writing.

Ray Tretheway

Volume I, p. 0-11. Spoke in support of the dedication of the Bannon Slough to the City of Sacramento for the protection of the habitat.

0-3

DP:lr

## DIEPENBROCK, WULFF, PLANT & HANNEGAN

LAW OFFICES

488 CAPITOL MALL

8TH FLOOR

SACRAMENTO, CALIFORNIA 95814

(916) 444-3910

December 21, 1984

HAND-DELIVERED

CITY PLANNING DIVISION

DEC 21 1984

RECEIVED  
4:50 pm

TELECOPIER  
(916) 444-1888

TELEX  
70-8328

OUR FILE NO. 15785/251

FORREST A. PLANT  
JOHN J. HANNEGAN  
ROBERT R. WULFF  
JOHN S. OLMOORE  
DAVID A. RIEGELS  
DENNIS H. CAMPOS  
JACK V. LOVELL  
JOHN E. FISCHER  
DOUGLAS T. FOSTER  
KAREN O. AHERN  
FORREST A. PLANT, JR.  
THOMAS G. MOUTES  
FRANCIS H. GOLDSBERRY II  
JEFFERY DIMENSBY  
MARY L. MUEB  
MICHAEL D. WELCH  
DAVID R. HUSKEY  
MARGUERITE E. C. HOSNER

JOHN V. DIEPENBROCK  
B. JAMES DIEPENBROCK  
CHRIS A. JOHNSON  
THOMAS A. CRAVEN  
WILLIAM B. SHUBB  
JAMES T. FREEMAN  
DENNIS R. HILGERT  
WILLIAM W. SUMNER  
CHARITY KENTON  
BRIAN T. REGAN  
RAYMOND M. CADET  
MICHELE E. BACH  
KEITH W. MCBRIDE  
TIMOTHY R. HILGERT  
VICTORIA J. DAVIS  
JENNIFER L. WILKINSON  
ALAN B. BERMAN  
LAWRENCE B. GARCIA

SUBJECT:

Willow Creek Associates

Ms. Diana Parker  
Sacramento City Planning Commission  
927 10th Street, Suite 300  
Sacramento, California

Dear Diana:

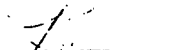
Enclosed are the comments of Willow Creek Associates to the Draft Environmental Impact Report/South Natomas Community Plan Update and Related Projects.

We appreciate your unfailing cooperation and willingness to answer questions and provide advice.

If you have any questions regarding any of the matters contained in the comments, please call me or Mr. Greg Rodgers of Willow Creek Associates.

Very truly yours,

DIEPENBROCK, WULFF, PLANT  
& HANNEGAN

By   
Karen O. Ahern

Enclosures

cc: Mr. Greg Rodgers

COMMENTS TO  
DRAFT ENVIRONMENTAL IMPACT REPORT/  
SOUTH NATOMAS COMMUNITY PLAN UPDATE AND  
RELATED PROJECTS

I

INTRODUCTION

Willow Creek Associates proposes a mixed-use development on one hundred twelve (112) acres west of Interstate-5 ("I-5"), south of Interstate-80 ("I-80") and north and south of West El Camino Avenue. Fifty-six (56) acres are proposed for residential uses; forty-five (45) acres for manufacturing, research and development uses ("MRD"), and eleven (11) acres for commercial uses. Comments have been divided into two (2) separate sections: the first directed to the EIR for the Willow Creek project contained in Volume 2 of the EIR; the second directed to the EIR for the Draft South Natomas Community Plan. For ease of reference, we refer to those portions of the EIR which discuss Willow Creek specifically as the "Willow Creek EIR" and the portion of the EIR which analyzes the Draft South Natomas Community Plan as the "Draft Plan EIR". Our comments are as follows:

II

WILLOW CREEK EIR

A. LAND USE

1. Consistency of Proposed Uses with Adjacent 1978 SNCP Plan Uses. (P. 15, Willow Creek EIR). The Willow Creek EIR states at p. 15 that MRD development "would be incon-

sistent with the future planned residential uses of the adjacent area" and that these impacts "would represent a significant adverse impact which could not be mitigated; to a less than significant level". This finding is, of course, contrary to that reached in the Creekside Oaks and Gateway Centre Environmental Impact Report wherein the consultant concluded that with appropriate setbacks, MRD uses at Gateway Centre would in fact be compatible with the adjacent residential area (see p. D-10 of the Creekside Oaks and Gateway Centre Draft EIR). As with Gateway Centre, we submit that with appropriate setbacks MRD uses are, in fact, compatible with residential development.

Secondly, we submit that locating residences next to a major freeway (as the 1978 SNCP proposes) should be identified in the EIR as having a significant adverse impact on the residents. The Willow Creek EIR discusses at length the detriment of having homes adjacent to MRD uses, without at any time commenting on the far more significant, and truly unmitigable, impacts of locating homes (and their outdoor recreation areas) next to I-80. Section K of the Draft Plan EIR documents those impacts and Exhibit K-6 shows unacceptable noise contours over the entire Willow Creek site north of West El Camino Avenue. Why is this not discussed in the analysis of the Willow Creek application?

2. Consistency with Other Relevant Plans and Policies. (P. 18, Willow Creek EIR). The EIR consultant states that the proposed project is potentially inconsistent with General Plan and Central City Plan policies "to the extent that marketability of the CBD is impacted". However, the

160

Kaiser/Marsten Study (see Appendix VII-5), concludes that South Natomas office development would have a minor impact on office development in the CBD. It is important to note that this statement is made based on approval of all 13 applications, which would provide up to 8.1 million square feet of office space (see p. VII-3), and not with reference to Willow Creek alone.

B. Employment (Section F).

The Willow Creek EIR at p. 22 states that build-out of the Willow Creek project would result in approximately 7,603 permanent jobs, but states that if these are not provided here they would "likely occur elsewhere in the Sacramento economy." Given the fiscal benefits to the City of Sacramento of office and MRD development (see the Ralph Anderson & Associates report submitted herewith and labelled Exhibit "A"), we submit that it is highly undesirable from a City fiscal viewpoint if the bulk of new office and commercial development locates outside the City limits. We question the statement (contained in each of the EIR's for the 13 applications) that the jobs created by the individual applications will be provided "elsewhere". If job-producing activities are not permitted where there is a strong market demand for development, how can the EIR consultant be assured that these jobs will, in fact, be provided elsewhere within the City or within the region? We submit that the EIR consultant should consider (i) the cumulative impact of the denial of the 13 applications on the provision of new jobs within the City of Sacramento and (ii) the cumulative financial impact on the City if the commercial and office portions of each application are denied.

C. HOUSING

1. Indirect Impacts. What is the basis for the assumption on p. 25 of the Willow Creek EIR that all professional workers in South Natomas would be relocated to the Sacramento area by their firms?

2. We wish to highlight a statement made by the EIR consultant on p. 26 that "the proposed project would enhance the marketability of residentially designated land in South Natomas, north Sacramento, and other communities because of its proximity to a major employment center." We think this is a very important benefit of the Willow Creek application which should have been noted in the Summary Table under Section D (Beneficial Impacts).

D. TRANSPORTATION

1. Our response to Section I (Transportation) of the Willow Creek EIR is contained in the enclosed letter from Mr. Charles Abrams of jhk associates (the letter is labelled Exhibit "B"). We ask that the EIR consultant respond to and comment on both the questions posed to Mr. Abrams and on his responses thereto. We specifically direct attention to Mr. Abrams' comments regarding the impact on levels of service at key intersections of the amount of Willow Creek traffic allocated to the uncongested I-80/West El Camino Avenue interchange, to the inconsistencies between various of the exhibits in the Willow Creek EIR and those in the Draft Plan EIR and to the assumed peak-hour trip distribution pattern described on Exhibit I-7 of the Willow Creek EIR. As to inconsistencies between the tables in the Willow Creek EIR and those contained

in the Draft Plan EIR, we note the following: Exhibit I-3 of the Willow Creek EIR states that approval of Willow Creek alone will result in an a.m. peak-hour D level of service at West El Camino Avenue/Truxel Road, while Exhibit S-33 in the Draft Plan EIR states that approval of all 13 applications will result in an a.m. peak-hour B level of service at this same intersection. Similarly, Exhibit I-3 states that approval of Willow Creek alone will result in a p.m. peak-hour D level of service at Garden Highway/Truxel Road, while Exhibit S-33 states that approval of all 13 applications will result in a p.m. peak-hour C level of service at this same intersection. These gross inconsistencies require explanation.

### III

#### DRAFT PLAN EIR

A. "STRIP" OFFICE DEVELOPMENT. We request that the EIR consultant comment on that portion of the Draft Plan which calls for a narrow band of office development on a portion of the Willow Creek site adjacent to I-80. What the Draft Community Plan proposes will result in a "strip" office development one office building wide. The author of the Draft Plan felt that this was desirable for two reasons: (1) because of the importance of not locating residential development adjacent to major freeways and (2) because the author believed that a "cluster" development would be more competitive with the CBD. We concur with the view that residential development should not be located, but note the Kaiser/Marsten Study prepared as part of the EIR states specifically, without equivocation, that even if the 8.1 million square feet of office development proposed in

the 13 South Natomas applications were approved, there would be very little impact on the CBD. See Appendix VII, pp 3-6.

B. PROPOSED RESIDENTIAL DEVELOPMENT. We think it extremely ill-advised to provide, as does the Draft Plan, for three (3) strips of different land uses (i.e., office, medium-density residential and low-density residential) in narrow bands. These will be extremely difficult to develop as cohesive communities. Please comment.

C. EAST-WEST CONNECTOR ROAD. We are greatly concerned about the proposed east-west connector which will bisect Willow Creek and materially reduce its attractiveness and developability while providing little if any benefits to the development itself (See the letter from Mr. Charles Abrams of jhk associates attached as Exhibit "B").

D. NOISE. We ask the EIR consultant to analyze the additional noise impacts on residential development if the east-west connector is extended from Capitol Business Park through the Willow Creek site.

E. PARK/SCHOOL SITE LOCATIONS. A portion of the Willow Creek site lies south of West El Camino Avenue. The author of the Draft Plan proposes that an approximate sixteen (16) acre park site and an approximate ten (10) acre school site be located on the southerly portion of the Willow Creek site. Our comments regarding this are as follows:

1. The school site and the park site are bisected by a high-tension power line and by a high-pressure gas line which is located directly beneath the school and park sites. We ask the EIR consultant to consider the advisability

of locating a school and a park on sites traversed by high-tension power lines and above high-pressure gas lines.

2. We ask that the EIR consultant consider the advisability of moving the park site south so that it is across from the water-front development along the Sacramento River. We think it makes sense to locate the park where the residents can also take advantage of the many amenities along the Sacramento River. There is an additional benefit: park sites adjacent to the Garden Highway will help preserve this area adjacent to the Sacramento River in a natural setting and will enhance the recreational potential of the Sacramento River and its environs.

3. As to the advisability of a school and park site near heavily-travelled West El Camino Avenue we ask that the EIR consultant consider the comments on this topic made by Mr. Gene Robinson, Director of Parks and Recreation, who testified at public hearings on the Draft Plan in opposition to locating parks near major arterials. His view is that the community residents are better served by parks which are pulled back from major streets so that the bulk of the park site can be utilized and where children are not at risk because of heavily-traveled adjacent streets. We think this makes sense and ask the EIR consultant to consider relocating the park to a southerly location near the Garden Highway and the Sacramento River.

4. By placing the school site just south of West El Camino Avenue, the Draft Plan leaves a three acre "remnant" of residential property which will be extremely

H-2  
(cont.)

H-3

H-4

H-5  
↓

difficult to develop. This "remnant" parcel is so small that it will be difficult to create a true "community" of homes and the size of the parcel does not provide the developer with any flexibility in the location of amenities or in the layout of the residences. Please comment.

F. FISCAL ASSESSMENT. Please see the comments of Ralph Anderson and Associates attached as Exhibit "A".

H-5  
(cont.)

OBSERVATIONS REGARDING  
FISCAL ASSESSMENT, SECTION R OF THE  
NOVEMBER, 1984, DRAFT EIR

1. Keyser Marston Associates' assumed amounts of development (square feet and dwelling units) for land uses in each alternative are different (generally lower) than the amounts shown elsewhere in the EIR, e.g., p. S-7, and B-8. To illustrate, the following differences are noted for the 13 applications alternative:

	<u>Exhibit R-21</u> <u>Keyser Marston</u>	<u>Section S, Exhibit S-7</u> <u>Cumulative Impacts</u>
Non-Residential sq. ft.		
Commercial	1,547,000	1,785,030
Office	6,100,000	6,248,391
MRD	4,058,000	4,100,700
Industrial	--	726,500
Medical	--	616,186
Marina	--	30,800
Total: Non-Res.	11,705,000	13,507,607
Residential Dwelling Units	10,222	18,744

The difference of 1,802,607 sq. ft. in non-residential could make a difference of \$324,469 in prop. tax revenues alone (1,802,607 x \$60/s.f. x 1% x City's 30%).

2. Also, the cost/revenue analysis uses a total residential population of 25,044 for the 13 Applications Alternative, while the EIR assumes a resident population of 46,860 for the same alternative. The residential population factor used for the cost and revenue analysis by Keyser Marston is 2.45 persons per dwelling unit applied to 10,222 dwelling units for the 13 Applications Alternative. However, in the EIR, Section S (page S-13) a factor of 2.5 per dwelling units is applied to 18,744 dwelling units. Why is there a difference, particularly in total resident population?

3. Fire protection operating costs include an estimated \$634,000 for relocation and expansion of an engine company for reasonable response time for development in South Natomas. In addition, another \$634,000 for the City to replace County personnel in County Company No. 17 when North Natomas is annexed. What is the rationale for including North Natomas costs in the South Natomas analysis? Excluding the North Natomas fire station cost of \$634,000 would substantially affect the net fiscal impact, particularly under the 13 Applications Alternative. While there may be a rationale for including some of the North Natomas fire station cost, there appears to be no rationale for including all of these costs.

4. For property tax revenue estimates (p. R-13) Keyser Marston Associates indicates that the City receives 30-35 percent of the total tax receipts in newly developed property, and assumes 30 percent for revenue projections. Why is the low end of the range used? If the mid-point in the range (32.5%) is used, the additional 2.5% share would mean \$303,550 more in property tax revenues for the 13 Applications Alternative at buildout.

5. What is the basis for the estimated development values per unit on page R-14 which are used to project assessed value for property tax revenues? The assumption of \$50,000/unit of residential appears low. For example the average building permit valuation for all 10 counties in the Sacramento Valley was \$57,671 in February, 1984, which is 15.3% higher than the amount assumed by Keyser Marston. This difference alone would add \$78,412,962 in assessed value for the 13 Applications Alternative, which would mean an increase in City property tax revenues of \$235,239 (assuming the City's share is 30% of total revenue).

6. Sales tax revenues are projected only from retail commercial land uses. Why are no sales tax revenues projected from office or industrial uses? A number of studies have shown that taxable sales occur from these types of land uses as well, since site of sale can often be in an office or at the manufacturing site.

R-6

7. For the 13 Applications Alternative, the revenues shown in the Exhibit R-21 summary are different (higher) than the revenues shown in the detail in Appendix Table B-8 (page VI-17 of Appendix VI). The narrative discussion is consistent with Exhibit R-21. Why are the revenue totals in the detail different than the revenue totals of the summary for the 13 Applications Alternative?

R-7

8. In forecasting miscellaneous revenues, it should be noted that the amount for Intergovernmental Revenues is extremely understated relative to the amount that would likely be received when development actually occurs. This is because the 1983-84 fiscal year is used for base data and in that year, state revenue subventions were significantly reduced, particularly Vehicle License Fee revenue. In 1984-85, the State Legislature restored full funding, and as a result the amount of intergovernmental revenue increased from \$4.3 million in 1983-84 to \$12.1 million in 1984-85. This would essentially triple the per capita revenue factor used by Keyser Marston, increasing the factor from \$14 per unit to approximately \$40 per unit. This would mean approximately \$651,144 more miscellaneous revenue for the 13 Applications Alternative than was forecast by Keyser Marston. The City would actually receive this additional amount from development, based on current intergovernmental funding level.

R-8

9. If alternative methodologies or assumptions are utilized for projecting revenues as suggested by the preceding, it is estimated that the analysis would show that approximately \$1,514,000 in additional revenue would be received by the City beyond what was projected by Keyser Marston for the 13 Applications Alternative. This additional revenue would be over and above the net revenue surplus of \$233,000 forecast by Keyser Marston at build-out. This implies that by using the alternative (and in our judgment more realistic) revenue assumptions, the City could expect a continuing revenue surplus of approximately \$1,747,000 annually at build-out of the 13 Applications Alternative. To the extent that the cost estimates used by Keyser Marston are high, this revenue surplus would increase accordingly.

R-9

December 20, 1984

Mr. Greg Rodgers  
Senior Vice President  
Lee Sammis Company  
1451 River Park Drive, Suite 110  
Sacramento, CA 95815

Dear Mr. Rodgers:

You have posed a number of questions to JHK & Associates regarding the traffic impact and traffic circulation of the Willow Creek development in the South Natomas area. The purpose of this letter is to respond to your questions and to clarify some of the traffic issues.

Question 1: From a traffic standpoint, what is the most suitable location within the South Natomas Community Plan Area to accommodate additional development density?

Response: The most serious traffic problems in the South Natomas area are expected to occur on I-5 where traffic volumes are nearing the capacity of the freeway and on the major intersections near the I-5 freeway ramps. These issues have been clearly documented in EIR traffic studies by CH2M HILL and in previous studies by JHK & Associates. The most favorable locations for additional developments within the area are in the vicinity of the I-80/W. El Camino interchange. This location has excellent freeway access and the interchanges have a good deal of additional capacity.

Question 2: To the west of I-5 which properties can best accommodate non-residential traffic use?

Response: The area west of I-5 is somewhat isolated by the I-80 and I-5 freeways and the Sacramento River. All external traffic must use either W. El Camino or Garden Highway to gain access to the area. The EIR traffic studies have correctly identified the problems in the vicinity of the I-5 ramps, but show that there is considerable excess capacity at the I-80/W. El Camino interchange. Clearly, the property in the immediate vicinity of this interchange is the most desirable from a traffic standpoint for additional office or business park development. The Willow Creek development is the preferred location from a traffic impact standpoint.

Mr. Greg Rodgers  
December 20, 1984  
Page 2

Question 3: Do you concur with the assumed peak hour trip distribution pattern shown on Exhibit I-7 of the 1984 Community Plan EIR?

Response: I have commented in the past of my concern regarding the directional distribution of traffic to and from South Natomas. Full buildout of this area is not expected to occur for over twenty years. At that time, there will also be increased development to areas north, east, and west of the South Natomas area. Traffic will be much more evenly distributed in all directions and will not exhibit the very high concentration to and from the south that exists today.

A far more significant problem occurs, however, when these assumptions are applied unilaterally to the Willow Creek development. Approximately 35% of the traffic from Willow Creek has been distributed in the EIR as follows:

Northgate (to the south)	- 17%
Arden/Garden (to the east)	- 12%
W. El Camino (to the east)	- 5%
San Juan Rd. (to the east)	- 3%

While these assumptions may apply to the areas east of I-5, they are clearly not appropriate or reasonable with respect to the Willow Creek development, and should be reduced significantly. The result has been to greatly overstate the extent of the Willow Creek contribution to traffic capacity problems at the critical intersections on Truxel Rd. and Northgate Blvd.

Question 4: The Willow Creek EIR shows some fairly significant increases in peak hour traffic congestion at W. El Camino/Truxel and W. El Camino/Northgate Blvd. Are these conclusions valid?

Response: This question is related to the response to Question 3. I do not believe these conclusions are valid. For example, the EIR shows a change in the degree of saturation from 100 to 108 at W. El Camino/Northgate during the AM peak due to the Willow Creek project. This simply cannot be valid given the distance of this intersection from the Willow Creek project.

Business Park/office developments located west of I-5 will have very little, if any, impact on the areas east of the freeway. There will be very few through trips, since the vast majority of external traffic will gain access to the site via the freeway interchanges. This is particularly true at Willow Creek, since it is adjacent to the I-80/W. El Camino interchange. The only change in traffic patterns would result from employees in these Business Parks who live to the east of I-5 and use West El Camino or Garden Highway to travel to this area. The traffic modelling process used in the EIR traffic studies clearly overstates these impacts with respect to Willow Creek.

I-3  
WC

I-4  
WC

I-5  
WC

I-6  
WC



Mr. Greg Rodgers  
December 20, 1984  
Page 3

Question 5: Has the Willow Creek EIR assigned a significant amount of project traffic to the I-80/W. El Camino interchange?

Response: The Willow Creek EIR does not state what percentage of traffic will access the project from I-80. However, it appears from Exhibit I-7 that approximately 15 to 20% of the traffic has been assigned to I-80.

Due to its location adjacent to the I-80/W. El Camino interchange, JHK estimates that a far greater percentage of the traffic generated by Willow Creek should be assigned to this location.

It is simply not valid to use the overall SNCP trip distribution percentages when analyzing the Willow Creek project. The fastest time path for a majority of the trips to and from Willow Creek will be via I-80. Even for many trips within the study area, the travel path selected by motorists will be I-80, using the Truxel Rd. and Northgate Blvd. exits from I-80.

Question 6: What is the impact of Willow Creek on the I-80/W. El Camino Ave. intersections?

Response: The Willow Creek EIR does not address this issue directly. The intersections of I-80 northbound ramps/W. El Camino and I-80 southbound ramps/W. El Camino have never been considered as critical intersections and have therefore not been evaluated in the EIR. In our previous studies of Gateway Centre, these intersections were shown to operate at Level of Service "A." With the addition of Willow Creek, our estimates are that they will be at Level of Service "B" and "A" respectively. All of the traffic studies we have conducted show a significant amount of excess capacity at these locations.

Question 7: Please compare Exhibit I-3 in the Willow Creek EIR with Exhibit S-33 in the Community Plan EIR.

Response: Exhibit I-3 portrays Intersection Level of Service for the 1978 SNCP with the Willow Creek project. Exhibit S-33 shows the Level of Service for the 13 Applications Scenario. As you note, there are several locations where Willow Creek has more severe traffic impacts than the 13 Applications Scenario, which cannot be a reasonable conclusion. It is quite likely, therefore, that the two exhibits are based on quite different roadway configurations, and I do not believe that they can be directly compared. You will need to ask the City staff and their consultant to clarify this issue.

Mr. Greg Rodgers  
December 20, 1984  
Page 4

Question 8: Does the proposed east-west connector extending from the Capitol Business Park west over the Natomas Main Canal provide substantial circulation benefits to Willow Creek?

Response: This connector will primarily serve trips from Capitol Business Park to the I-80/W. El Camino interchange. There will not be a great deal of Willow Creek traffic using this roadway, except where there are specific destinations in the Capitol Business Park.

To the extent that this connection improves the capacity at the W. El Camino/W. Gateway Oaks intersection, it will be to the benefit of all property owners in the area.

Thank you for the opportunity to respond to these issues. Should you have any further questions, please contact us.

Sincerely yours,

JHK & ASSOCIATES

*Charles M. Abrams*  
Charles M. Abrams  
Vice President

CMA:ac

I-7  
WC

I-8  
WC

I-9  
WC

I-10  
WC



COUNTY OF SACRAMENTO  
AIR POLLUTION CONTROL DISTRICT

December 20, 1984

Harty Van Duyn, Director  
City Planning Department  
927 10th Street, Suite 300  
Sacramento, CA 95814

Subject: DRAFT EIR SOUTH NATOMAS COMMUNITY PLAN UPDATE AND RELATED PROJECTS

Dear Harty:

Staff has reviewed the subject DEIR. As a result of this review, we are compelled to state our serious reservations about the cumulative adverse air quality impacts that would occur at build out if the proposed projects are approved as presented in the DEIR. The preparers of the document have clearly stated that increased emissions would incrementally add to violations of the National Ambient Air Quality Standard for Ozone and that the one hour standard for carbon monoxide would be exceeded during peak commute hours at certain key intersections.

The DEIR points out that these violations would occur after existing mitigation measures identified in the 1982 Air Quality Plan have been implemented. However, what is not stated in the DEIR is that substantial numbers of people would be exposed to an increasing number of air quality episodes in terms of duration and intensity and that such exposure would impair the health of those exposed persons. Secondly, the DEIR does not identify the indirect economic impacts that will result as air quality continues to deteriorate.

Preparers of the DEIR conclude that available air quality mitigation measures are inadequate to reduce potential air quality impacts to less than a significant level. Staff disagrees with this conclusion. It is our view that currently available mitigation measures could be made more effective through appropriate public policy decisions. Examples of these policy actions are:

1. Introduce legislation to change the current Motor Vehicle Inspection Program from a biennial to an annual program.
2. Introduce legislation to make the pass/fail emission levels in the motor vehicle inspection program more stringent.
3. Amend the current city/county trip reduction ordinances to remove voluntary provisions and accelerate compliance schedules.

NORM COVELL  
AIR POLLUTION CONTROL OFFICER  
8323 Tech Center Drive, Suite 800  
Sacramento, California 95826  
(916) 366-2107

Harty Van Duyn, Director  
Page 2

4. Accelerate implementation of public education programs to promote alternatives to the solo-auto commute trip.
5. Form a public/private working group for the purpose of developing public support for a dedicated transit tax.
6. Work with the Regional Transit District to develop and implement a regional land use ordinance to assure consideration and funding for future transit needs.
7. Develop and implement public policy that would require all employers to charge a mandatory employee parking fee. Such fee revenues would be dedicated to the regional transit district. This kind of a policy should be a clear disincentive to the solo-auto commute trip.

We recognize that implementation of any of the above examples would not be politically easy. However, we must accept the fact that these kind of measures must be taken now if we are to allow for growth while at the same time not becoming the Los Angeles of Northern California.

If you have any questions regarding our comments, please call me at (916) 366-2107.

Sincerely,

*Norm Covell*  
NORM COVELL  
Air Pollution Control Officer

NC7/8:jb

cc: Regional Transit District

J-9  
Cont.

J-7

J-8

J-9

**WEISSBURG AND ARONSON, INC.**

ATTORNEYS AT LAW  
32ND FLOOR, TWO CENTURY PLAZA  
2040 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067  
TELEPHONE (213) 277-2223  
TELECOPIER (213) 557-8475

December 13, 1984

CITY PLANNING DIVISION

DEC 17 1984

**RECEIVED**

ALAN J. EPSTEIN  
ROBERT J. GERSI  
ROBERT A. KLEIN  
ALBERT C. MOORE  
PETER ARONSON  
CARL WEISSBURG  
RICHARD A. BLACHER  
WIN R. RICHY  
JAY N. HARTZ  
PATRIC HOOPER  
MARK S. WINDISCH  
J. MARK WAXMAN  
MICHAEL J. TICHON  
ROBERT W. LUNDY JR.  
KENNETH M. STERN  
CARL H. HITCHNER  
ROBERT D. SEVELL  
ELMER D. MARTIN III  
MARSHALL R. FUSS  
JOHN R. SPARKS

RICHARD F. STODEN  
ROBERT M. DAWSON  
LLOYD A. BODMAN  
ROBERT B. MCCRAY  
MARK A. RADZIELSKI  
JAMES H. HALYVAS  
ROBERT J. ENDESH  
ANGELA A. MICHELSON  
JOHN R. HELLOW  
W. BRADLEY TULLY  
LAURIE R. KATZ  
ANITA D. LEE  
LINDA A. MILLS-COYNE  
JOEL H. GUTH  
JAY T. LEVITT  
PATRICIA BUCALO  
DOUGLAS S. CUMMING  
PETER N. GRANT  
MARIANNE DOZIER  
CRAIG T. CUDEN

\*A PROFESSIONAL CORPORATION  
OF CALIFORNIA

HAND-DELIVERED

Ms. Diana Parker, Associate Planner  
City Planning Department  
927 10th Street  
Sacramento, California 95814

Re: South Natomas Community Plan Revision:  
Northwest Corner of Northgate Boulevard  
and "Old" San Juan Road

Dear Ms. Parker:

On November 12, 1984, we submitted comments on behalf of Mr. and Mrs. Frank Westersund regarding the Draft South Natomas Community Plan revision. Specifically, we commented on that aspect of the revision which would redesignate approximately 3.6 acres of the 9.6 net acre commercial site at the northwest corner of Old San Juan Road and Northgate Boulevard from commercial to medium high density residential development.

We have now completed a review of the Draft Environmental Impact Report (DEIR) for the South Natomas Community Plan revision. I will not here repeat our comments in the November 12, 1984 correspondence. Instead, please consider that correspondence to be incorporated by this reference and provide it the DEIR consultant for inclusion in the final Environmental Impact Report.

Briefly summarized, our comments on the DEIR are as follows:

1. By applying the methodology and assumptions used in the DEIR's transportation analysis, it is clear that the 1984 SNCP (or "Blayne Proposal") would increase peak hour traffic arising from the 9.6 acre Westersund parcel.

**WEISSBURG AND ARONSON, INC.**

Ms. Diana Parker, Associate Planner  
December 13, 1984  
Page 2

SACRAMENTO OFFICE

680 "J" STREET, SUITE 400  
SACRAMENTO, CALIFORNIA 95814  
(916) 443-8005

SAN FRANCISCO OFFICE

ONE EMBARCADERO CENTER  
SUITE 2201  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 434-4484

PLEASE ADDRESS REPLY TO

Sacramento

2. Because of site constraints and existing RUD restrictions, reducing the commercial development of the Westersund parcel to a 6 acre site may result in "strip" commercial development, which has been identified by the Blayne Proposal itself as a serious problem on Northgate Boulevard.

3. Reduction of commercial development on the Westersund parcel would result in the project being suitable for only a single rather than two "anchor" tenants. Therefore, a shopping center at that location would be less attractive to shopping center developers because it would be less desirable and useful for nearby residents, including residents of the northwestern portion of the North Sacramento community. At least some of these shoppers would therefore be expected to travel through the highly congested intersection of Northgate Boulevard and West El Camino Avenue to reach Northgate Shopping Center. Therefore, the Blayne Proposal would cause this additional increase in transportation problems in South Natomas.

Please contact me if you have any questions regarding these comments.

Very truly yours,

*Robert B. McCray*  
Robert B. McCray

RMC:tcn:36Q

I-14