



JT.
12-289 (6)

DEPARTMENT OF
PUBLIC WORKS

OFFICE OF THE DIRECTOR

CITY OF SACRAMENTO
CALIFORNIA

CITY HALL
ROOM 207
915 I STREET
SACRAMENTO, CA
95814-2673

916-449-5283

December 12, 1989

Joint Transportation and Community Development
and Budget and Finance Committee
Sacramento, California

Honorable Members in Session:

SUBJECT: **NORTH NATOMAS FREEWAY IMPROVEMENTS PROJECT - RESPONSE TO COMMENTS ON
PROPOSED NEGATIVE DECLARATION**

SUMMARY

On November 28, 1989, the City Council opened a public hearing to receive public testimony on a proposed Negative Declaration for the North Natomas Freeway Improvements Project. The hearing was continued to the Joint meeting of the Budget and Finance/Transportation and Community Development Committee at 1:30 PM (and then the City Council at 7:30 PM) on December 12, 1989. The attached City Council report contains the City staff response to comments received at the public hearing, and to written comments received during the 30-day public review period on the proposed Negative Declaration. Staff recommends that an additional mitigation measure be included with the proposed Negative Declaration which would offer City support for a study of potential retrofitting Light Rail into the proposed Truxel Road/I-80 Interchange, and consideration of a funding source for costs associated with right-of-way acquisition and construction of a Light Rail crossing of I-80 at Truxel Road.

BACKGROUND

See the attached report to City Council.

FINANCIAL DATA

None.

RECOMMENDATION

It is requested that the Joint Transportation and Community Development and Budget and Finance Committee review this report and forward to the full City Council for approval.

Recommendation Approved:

Walter J. Slape

FOR

SOLON WISHAM, JR
Assistant City Manager

MHJ:SLJ:jd
DS6-02.D
12.0889.1

Approved:

Melvin H. Johnson
MELVIN H. JOHNSON
Director of Public Works

December 12, 1989
District No. 1

CONTACT PERSON

Gary Alm, Senior Engineer
449-8732



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BACKGROUND

At the City Council meeting on November 28, 1989, staff presented a report which recommended approval of two resolutions:

1. Approving the proposed Negative Declaration, with the mitigation measures identified in the accompanying Initial Study; and
2. Conditionally authorizing execution of various agreements with Caltrans for the development and construction of the various elements of the North Natomas Freeway Improvements project.

This staff report supplements the information and recommendations contained in the November 28, 1989 report to the City Council. This report recommends additional mitigation measures which, by their adoption, will clarify and eliminate the potential for adverse impacts raised during the public comment period. It should be noted, however, that no new information has been introduced into the process which would alter the recommendations contained in the November 28, 1989 staff report.

FINANCIAL DATA

None.

POLICY CONSIDERATIONS

Interchange Improvements Necessary For Proposed Stadium:

On October 28, 1986, the City Council approved Resolution 86-830 approving a Special Permit for the Sports Complex in North Natomas. Construction of the Truxel Interchange on I-80 was required as a condition of approval for the Arena, and construction of the North Market Interchange on I-5 was required as a condition of approval prior to operation of the Stadium. Construction has commenced on the Stadium, and the City Council has recently authorized financing for the acquisition of a National Football League team to play in the Stadium. Approval of the North Natomas Freeway Improvements project is necessary to implement on-going City policy with respect to the Sports Complex.

RESPONSE TO CITY COUNCIL REQUEST FOR INFORMATION

Individual Councilmembers asked several questions of staff during the November 28, 1989 hearing, most of which were responded to at that time. However, Councilmember Kastanis requested a report back on the history of the Natomas Light Rail extension as it relates to the Truxel Interchange, and Councilmember Fargo requested information on why park-and-ride lots were not being considered as part of the proposed project.

Natomas Light Rail:

By letter dated October 11, 1984, during the early stages of the North Natomas Community Plan process, Regional Transit (RT) staff indicated that they would be:

"... willing to prepare detailed service proposals for the community alternatives. The proposals would include consideration of routings, modes of service, levels of service, equipment, facilities and operating costs... Currently, RT is not able to state that light rail would be justified. Yet, at this point, it is advisable that nothing should be done to preclude its future development."

From that point forward, Light Rail was a fundamental component of the formulation of the North Natomas Community Plan.

During March 1985, RT submitted several detailed routing alternatives for providing Light Rail and bus transit service to the North Natomas area. These alternatives were analyzed and incorporated into the Fiscal and Transportation sections of the North Natomas Community Plan Draft EIR. At least two of the alternatives proposed the Truxel corridor as a Light Rail alignment.

Concurrently with the analysis of Light Rail in North Natomas, the City Council adopted Resolution 85-078 on January 29, 1985, which nominated the proposed Truxel Road/I-80 Interchange for inclusion in the State Transportation Improvement Program. This request was approved by the California Transportation Commission in June 1985. By July 1985, final geometric drawings were being prepared for the Truxel Interchange, yet an LRT alignment and crossing of I-80 had not yet been resolved.

In an effort to resolve this issue, the City Planning Director forwarded a letter dated July 24, 1985 to SACOG (see Exhibit "A") requesting that the Natomas alignment for Light Rail be determined immediately. The City's request

led to a determination in SACOG's February 7, 1986 Sacramento Light Rail Transit Extension Study Phase I Final Report that the Natomas extension of Light Rail would be from downtown, via I-5 rather than Truxel Road. The I-5 alignment was subsequently adopted by the RT Board of Directors on January 11, 1988. As a result, it has been assumed by staff of the City, Caltrans and the Federal Highway Administration since early 1986 that any future consideration of a Truxel Light Rail alignment would have to cross I-80 by way of a separate structure, and such a structure would not be precluded by the design of the Truxel Interchange.

It should be noted that on November 29, 1988, the City Council adopted Resolution 88-1018, which deleted the proposed I-5 Light Rail alignment from the South Natomas Community Plan, and suggests that an inter-agency study consider a crossing of the American River Parkway at an existing American River crossing corridor instead.

Park-and-Ride Lots:

The previously mentioned March 1985 service analysis of the North Natomas Community Plan prepared by RT proposed several park-and-ride locations, although none of the identified locations were associated with elements of the North Natomas Freeway Improvements project. Similarly, Policy 6a on page 48 of the adopted North Natomas Community Plan indicates that:

"The North Natomas Business Association... shall assume the primary responsibility to implement a comprehensive TSM plan for the North Natomas Community that... provides commuter parking spaces (park-and-ride) at major arterial intersections with State highways and each other..."

However, as of this date the North Natomas Business Association has not yet been established. Discussions during the preparation of the North Natomas Community Plan indicated that the most appropriate locations for park-and-ride lots would be in association with the Sports Complex, at Light Rail stops, and at the first intersection adjacent to a freeway interchange rather than at an interchange itself. Given the foregoing, and the professional opinion of the City Traffic Engineer and traffic consultant on the project, the top of page 90 of the subject Initial Study/Environmental Assessment concludes that traffic flow conditions on North Natomas streets will operate at acceptable levels and additional measures such as park-and-ride lots are not necessary at this time. Park-and-ride lots are addressed in the Air Quality Element of the adopted North Natomas Community Plan, and will be implemented at such time as the area develops.

Finally, the adopted South Natomas Community Plan does not mention the need for park-and-ride lots in that community. Consideration could be given to establishing a park-and-ride lot at either Rosin Court/Truxel or San Juan/Truxel (possibly in association with a Light Rail stop) at such time as either Light Rail or the Fong Ranch property are developed. This has not been identified as part of the North Natomas Freeway Improvements project, however.

RESPONSE TO WRITTEN COMMENTS ON PROPOSED NEGATIVE DECLARATION

The only written comments received by the City during the public review period were from RT and the U.S. Environmental Protection Agency (EPA). Copies of each of these letters are attached as Exhibits "B" and "C."

Regional Transit:

RT requests clarification of the City's response to two comments which they submitted on July 10, 1989, during the public review of the Initial Study/Environmental Assessment (see pages 105-106 of IS/EA attached to proposed Negative Declaration).

Comment #1: RT is currently involved in a Systems Planning Study which includes a route refinement study for a Light Rail alignment from downtown to Metro Airport. The City and Caltrans should consider the potential joint-use of the Truxel Interchange for both Light Rail and automobile traffic instead of assuming that Light Rail would cross I-80 by way of a separate structure.

Response #1: The history of why Light Rail has not been incorporated into the design of the Truxel Interchange is more fully described in the "Natomas Light Rail" section of this staff report. Furthermore, as indicated in the Response to Comment #1 from RT on pages 105-106 of the IS/EA, staff of the City and Caltrans continue to believe that the proposed design of the Truxel Interchange will not physically preclude the construction of Light Rail across Interstate 80 because the crossing could be made by way of a separate bridge structure. However, RT indicated during the public hearing on November 28, 1989, that the cost of such a separate structure might economically preclude the feasibility of a Truxel Light Rail alignment.

In an effort to resolve this concern, City staff met with representatives of Caltrans and RT on November 30, 1989, and with RT staff again on December 5, 1989. Details of these meetings can be addressed at the December 12, 1989 hearing. However, in order to avoid any potential adverse impact (financial or otherwise) on the ability of RT to utilize a Truxel Road alignment for Light Rail, the City staff recommends that the following mitigation measure be included in the proposed Negative Declaration:

"In the event that the Systems Planning Study, currently being undertaken by Regional Transit, recommends a Light Rail alignment between downtown and North Natomas by way of the Truxel Road/I-80 Corridor, the City agrees to support a study of the structural and operational feasibility of retrofitting a single track Light Rail line onto the proposed Truxel Road/I-80 Interchange or a separate crossing structure. Any crossing of I-80 is subject to the approval of Caltrans and the Federal Highway Administration. The City agrees to consider the inclusion of right-of-way acquisition and construction costs of either a retrofit or a separate structure crossing of I-80 (if required) as part of the North Natomas Financing Plan or some other appropriate funding source."

Comment #2: RT suggests that the subject environmental assessment should address the feasibility of incorporating park-and-ride facilities into the design of the proposed interchanges.

Response #2: As noted in the "Park-and-Ride Lots" section of this staff report, the primary responsibility for implementing the TSM provisions of the North Natomas Community Plan will rest with the North Natomas Business Association. This association must be established before

any land use entitlements are granted by the City in the North Natomas area. The City has not received any evidence to show that the TSM policies and mechanisms contained in the adopted North Natomas Community Plan (and as analyzed in the North Natomas Community Plan Draft EIR) are either unworkable, infeasible or will not result in the assumed reduction in potential adverse environmental impacts to traffic and air quality.

U.S. Environmental Protection Agency:

For the most part, the EPA letter dated December 4, 1989 reiterates previous comments contained in their July 19, 1989 letter on the Initial Study/Environmental Assessment (see pages 107-111 of the IS/EA). Generally, EPA's comments fall within two areas:

1. Potential impacts on efforts to meet the National Ambient Air Quality Standards in the Sacramento area; and
2. Potential continued violations of the special conditions of the EPA Sacramento Regional County Sanitation District Wastewater Treatment Construction Grant.

While EPA may disagree, City staff believe that each of these concerns are adequately responded to on pages 107-111 of the IS/EA. In particular, page 111 addresses the issue of the Regional Sanitation District Grant conditions:

"Irrespective of the merits of the dispute between EPA and SRCSD concerning this subject, it would not appear that there is a relationship to the proposed roadway improvements... The construction of the proposed roadway improvements will have no effect upon resolution of the dispute between EPA and SRCSD."

Similarly, EPA raises a concern about the October 5, 1989 SACOG letter (a copy of which follows page 115 in the IS/EA) which explains the process by which SACOG found that the North Natomas Freeway Improvements Project was in conformity with the 1982 Sacramento Air Quality Plan. Any concerns which EPA has regarding this issue must be resolved with SACOG and/or the Federal Highway Administration. The City of Sacramento followed the procedures specified by SACOG to obtain the conformity determination, but the City did not make the determination.

The following are the City's responses to other specific comments contained in the December 4, 1989 EPA letter:

Comment #1: EPA believes that in view of Sacramento's very severe air pollution, the City should commit to full study and implementation in the near future of all feasible mitigation measures stipulated in the North Natomas Community Plan and Settlement Agreement.

Response #1: As stated in the "Park-and Ride Lots" section of this report, and in Response #2 to the comments of RT, the City is committed to the implementation of trip reduction and air quality measures which are included within the adopted North Natomas Community Plan. These measures are required by various Development Agreements which have been executed with landowners in the area, and must be formulated by the North Natomas Business Association before any land use entitlements (and related traffic generation) are approved by the City.

The issue is one of timing. As stated on Page 90 of the IS/EA (and elsewhere in this report) it is the professional opinion of the City Traffic Engineer and project traffic consultant that these measures are not necessary at this time, and no new or specific evidence has been provided which would lead to a different conclusion.

Comment #2: The analysis of impacts to ambient air quality assumes full buildout under the No Project alternative, despite acknowledgement that if any of the proposed actions are not taken then "some increment of growth would not occur" (p. 90). The IS/EA thereby fails to fully address potential impacts of additional buildout that would occur as a result of greater vehicle access provided by the proposed project.

Response #2: The North Natomas Freeway Improvements Project is an integral part of the adopted North Natomas Community Plan. As a result, Page 53 of the IS/EA attached to the proposed Negative Declaration indicates that a variety of documents describing existing and future conditions in the Study Area have been incorporated into the IS/EA by reference. One of these documents is the Draft and Final EIR for the adopted North Natomas Community Plan.

In particular, Section "F" of the Draft EIR addresses a full range of local and regional air quality impacts resulting from urbanization of the North Natomas area, and provides a comparison of the incremental change in emissions between Alternative "A" (existing conditions) and the adopted Community Plan (Alternatives C/D). See Exhibit F-14 for details. As a result of the air quality analysis, impacts and mitigation measures contained in Section "F" of the Draft EIR, the TSM and air quality policies and programs contained in the North Natomas Community Plan were adopted by the City Council and will be implemented as the area develops.

Comment #3: The IS/EA clearly states that the proposed project is an integral part of the North and South Natomas Community Plans and is considered essential and required mitigation for this planned development (p. 4-8 EA; p. 15 Hydrologic and Water Quality Evaluation Report; p. 12 Floodplain Evaluation Study). Furthermore, portions of the proposed project are conditions of approval for major projects in the area (p. 6-8, EA).

Response #3: It appears that EPA raises this issue in the overall context of regional air quality concerns. As noted elsewhere in this report, City staff believes that the proposed Negative Declaration and attached IS/EA adequately address the air quality issue. The North Natomas Freeway Improvement Project is considered to be a mitigation (and in some cases was assumed) as being necessary for the urbanization of the North Natomas area. However, the regional growth inducing and cumulative impacts resulting from such urbanization was

exhaustively analyzed on Pages B-57 to B-85 of the North Natomas Community Plan Draft EIR (incorporated into the IS/EA by reference). The proposed freeway improvements are necessary to support the land uses contained in the previously adopted North Natomas Community Plan and to mitigate the impacts to traffic and air quality resulting therefrom.

RESPONSE TO VERBAL COMMENTS AT NOVEMBER 28, 1989 HEARING:

The following is a summary of public testimony received at the November 28, 1989 hearing of the City Council, along with the staffs' response to significant comments on the proposed Negative Declaration.

Mr. Tom Matoff - General Manager of Regional Transit:

Comment #1: The present design of the proposed Truxel Road/I-80 Interchange does not allow for the extension of Light Rail in the future. The concern of RT is that no steps should be taken to design and construct the interchange which would preclude building Light Rail at that location if that was ultimately to be the choice of the RT Board and the City Council.

Response #1: This comment is responded to in detail by Response #2 to the written comments submitted by RT during the public review period for the proposed Negative Declaration.

Mr. Gregg Wardrip - Resident of Vallarta Circle in South Natomas:

Comment #1: The residents of Vallarta Circle are concerned that access and egress into and out of the neighborhood might be restricted by the building of the Truxel Road extension because if there were to be a solid median on Truxel Road, residents would be limited to "right turns in and right turns out" of the neighborhood.

Response #1: This comment is identical to a comment raised by the Natomas Community Association in their June 28, 1989 letter on the Initial Study/Environmental Assessment (see Comment #3 and Response on Page 113 of the IS/EA), and to Comment #3 in Mr. Wardrip's June 30, 1989 letter on the IS/EA (see Comment #3 and Response on Page 114 of the IS/EA).

Subsequent to the receipt of those comments, the City Traffic Engineer met with residents of the Vallarta Circle neighborhood and/or representatives of the Natomas Community Association on three separate occasions to resolve the issue of ingress and egress. As noted in the above mentioned response to Comment #3 of the Natomas Community Association, the City Traffic Engineer agreed to either:

1. Design Rosin Road to intersect Truxel Road with the north leg of Vallarta Circle; or

2. The median island of Truxel Road could be designed to allow left turns in and out of the Vallarta Circle neighborhood.

The City Traffic Engineer indicates that either of these two options were acceptable to the Natomas Community Association and residents of Vallarta Circle.

Following the hearing on November 28, 1989, City staff met with Mr. Wardrip and Mr. Tretheway of the Association to resolve the issue of access. Various options were explored and alternative designs developed by staff for review by the neighborhood. On December 5, 1989, Mr. Wardrip verbally notified staff that the consensus of the neighborhood and Natomas Community Association was to reject all alternatives except for the construction of a frontage road access to Truxel Road.

The City Traffic Engineer believes that the previously agreed to design options listed on Page 113 of the IS/EA are reasonable, feasible, safe and cost effective ways in which the City can provide access to the Vallarta Circle neighborhood. However, additional alternatives will be explored and presented at the Joint meeting of the Budget and Finance/Transportation and Community Development Committee on December 12, 1989.

Finally, it should be noted that the proposed Truxel Road/I-80 Interchange has been included in the adopted Freeway Agreement between the City and Caltrans since April 18, 1963, and has been included in subsequent versions of the City General Plan. The Truxel Road extension is included in the South Natomas Community Plan going back to its first adoption by the City Council on February 21, 1978. This road is listed on Page 28 of the most current version of the South Natomas Community Plan (adopted November 29, 1988) as a "... major street between San Juan and I-80, with six traffic lanes."

Comment #2: The residents of Vallarta Circle are concerned about the noise impact of the proposed Truxel Road extension, indicating that the Initial Study/Environmental Assessment agrees that noise standards will be exceeded and no consideration is given to abating the noise for the Vallarta Circle neighborhood.

Response #2: This comment is essentially identical to previous comments raised by Mr. Wardrip (see Comment #4 and Responses on Page 114 of the IS/EA) and by the Natomas Community Association (see Comment #2 and Response on Pages 112-113 of the IS/EA). The City's previous response remains valid and accurate, but may need clarification.

As noted on Pages 13-14 of the Traffic Noise Study dated March 1989 for the North Natomas Freeway Improvements project, and as summarized on Pages 112-114 of the IS/EA in response to the above-mentioned comments, projected noise levels along Truxel Road will exceed the City's goal of an L_{dn} not in excess of 60 dB in residential areas. However, as stated in the Traffic Noise Study and on Table 1 (Pages 8-28) of the Noise Element of the City General Plan adopted on January 19, 1988, this requirement only applies to the backyards of single family homes. Assuming the existence of a six-foot solid fence constructed around the rear yard, noise levels are projected to range from 58-61 dB which would conform with the City standard given a margin of precision in the noise projection and the inability of the human ear to distinguish changes in noise levels of less than 3 dB.

Although noise levels of up to 71 L_{dn} may be experienced in front yards, front yards are generally not used for outdoor activities. City environmental policy has been to apply the General Plan noise standards on a city-wide basis as indicated in the Noise Element (i.e., for backyards), and to indicate a potential significant adverse impact only when noise studies show that such standards will be exceeded. This is not the case in the present situation.

Mr. Wardrip has also suggested that the Truxel Road extension should be relocated to the east as a means for reducing the noise impact. However, when the noise source is essentially a continuous line (e.g., vehicle traffic on a roadway), noise levels decrease by about 3 dB for every doubling of distance away from the reception (e.g., human ear). In this instance, relocating the Truxel extension an additional 60 feet to the east would result in a decrease of about 3 dB which is barely perceptible to the human ear.

Given the design of the existing San Juan/Truxel Road intersection and the location of the Truxel Road Overcrossing of I-80, the City Traffic Engineer has determined that such a relocation of the Truxel Road extension would not be feasible from the standpoint of design, cost of public safety, and would result in a less than significant reduction in noise impacts to the Vallarta Circle neighborhood.

Mr. Ray Tretheway - On Behalf of the Natomas Community Association:

Comment #1: Mr. Tretheway spoke to the same concerns of noise and access/egress to the Vallarta Circle neighborhood as raised by Mr. Wardrip, and to the Light Rail extension/design of the proposed Truxel Road/I-80 interchange as raised by Mr. Matoff.

Response #1: See response to comments by Mr. Wardrip and Mr. Matoff contained in this staff report.

Mr. Mike Eaton - On Behalf of the Environmental Council (ECOS):

Comment #1: It is very important in the future that transit be built into the funding package to the maximum extent possible.

Response #1: Response #1 to the written comments of Regional Transit listed elsewhere in this report recommends that an additional mitigation measure be included in the proposed Negative Declaration in which the City agrees to consider a funding source for costs associated with a Light Rail crossing of I-80 at Truxel Road.

Comment #2: The City Council should not proceed with the approval of an interchange at Truxel Road that isn't Light Rail friendly.

Response #2: See Response #1 to the written comments of Regional Transit listed elsewhere in this report.

RECOMMENDATION

It is recommended that the City Council:

1. Close the public hearing.
2. Incorporate an additional mitigation measure into the proposed Negative Declaration as specified in this staff report which addresses the issue of a potential Light Rail crossing of I-80 at Truxel Road.
3. Adopt the recommendations contained in the November 28, 1989 staff report on this matter.

Recommendation Approved:



WALTER J. SLIFE
City Manager

MHJ:SLJ:jd
DS6-02.D
12.0889.1

Approved:



MELVIN H. JOHNSON
Director of Public Works

December 12, 1989
District No. 1

CONTACT PERSON

Gary Alm, Senior Engineer
449-8732



CITY OF SACRAMENTO

FILE COPY
EXHIBIT
"A"

DEPARTMENT OF PLANNING AND DEVELOPMENT

1231 "I" Street

Sacramento, Ca. 95814

Administration
Room 300 449-5571
Building Inspections
Room 200 449-5716
Planning
Room 200 449-5604

July 24, 1985

Mr. James E. Williams
Executive Director
Sacramento Area Council
of Governments
106 K Street, Suite 200
Sacramento, CA 95814

SUBJECT: Extension of LRT to North Natomas Community Plan Area

Dear Mr. Williams:

As you know, the City of Sacramento has been conducting comprehensive community planning studies in both the North and South Natomas areas of the City. On Monday July 22nd, the City Council adopted a revised South Natomas Community Plan, and is scheduled to adopt a North Natomas Community Plan on January 7, 1986. Until recently, it had been assumed that the provision of LRT to serve the North and South Natomas areas (and ultimately Metro Airport) would be determined as part of SACOG's LRT Extension Study. However, based on the City Council's unhappiness with that approach as voiced during the recent South Natomas public hearing process, I am writing this letter to alert you to the need to prevent a similar situation from occurring during the North Natomas planning process and to work with you to propose a timely solution to this problem.

South Natomas Community Planning Process

Because the planning for an LRT alignment was not included as part of the South Natomas community planning process, the City Council has adopted a Community Plan designating land use types, locations and intensities which may bear no relationship to the most efficient provision of LRT services to the area. However, as a result of our earlier assumption that the LRT extension Study would ultimately determine the specific alignment and system-wide priority for LRT in South Natomas, the Community Plan will contain language requiring that this issue be looked at in six-months and that the Plan be amended at that time to designate a specific alignment through the community. The downside risk of this approach is that the alignment which is designated by the Plan may not be in the most desirable location as if it had been planned earlier, and subsequent development approvals may have resulted in the need to acquire right-of-way through purchase rather than dedication.

"A"

North Natomas Community Planning Process

Unlike South Natomas, the planning for an LRT system to serve North Natomas has been an integral part of the planning process from the beginning, and was included within the contractual work program of members of the North Natomas Consultant Team. During the preparation of the Draft North Natomas Community Plan between June through December 1984, both the traffic consultant and the community planning consultant were required to analyze several possible LRT alignments before selecting one on the Draft Plan. Land use types, locations and intensities contained in the Draft Plan were designated to support the proposed LRT alignment and station locations.

During preparation of the North Natomas Community Plan Alternatives Draft EIR between December 1984 through June 1985, four additional land use plans were prepared for analysis in the EIR. As part of this process, Regional Transit was requested to provide suggested LRT alignment alternatives and cost estimates (see attached letters dated March 7 and 19, 1985, from Regional Transit which also contain maps of the suggested LRT alignment alternatives).

The Problem is One of Timing

Unfortunately, all of the suggested LRT alignments serving the North Natomas Community Plan area must traverse South Natomas, and we will not know the South Natomas alignment (and more importantly, the location it will cross Interstate 80 into North Natomas) for another six months. As can be seen from the attached North Natomas Processing Schedule dated January 28, 1985, the City Council intends to make its decision regarding the North Natomas Community Plan on January 7, 1986. Because of the stadium/arena issue, the City Council will not be inclined to delay the schedule to wait for the completion of the LRT Extension Study.

Furthermore, the staff's recommended Community Plan must be completed by the first of November (only three months away) for presentation to the City Planning Commission on November 21, 1985. BUT MOST SIGNIFICANT OF ALL, is the fact that two of the four LRT alignments suggested by Regional Transit would cross Interstate 80 at the proposed Truxel interchange. The construction of this interchange was placed in the STIP in June 1985, and because of its importance to both North and South Natomas, consultants working with Cal Trans and the North Natomas landowners commenced work on the final geometric approval drawing for the Truxel Interchange on July 15, 1985. AS OF THE DATE OF THIS MEMO, LRT IS NOT BEING PLANNED AS PART OF THE INTERCHANGE DESIGN.

Suggested Solution

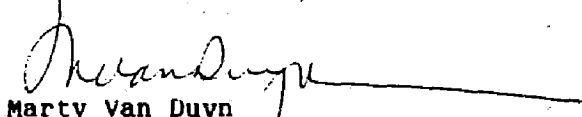
Because of the City Council's processing schedule for the North Natomas Community Plan, and the fact that the Truxel Interchange is in the process of being designed, we can not wait for the outcome of the LRT Extension Study before proceeding with LRT planning in North Natomas. As a result, I suggest that the issue of determining the North Natomas alignment be scheduled as one

"A"

of the first agenda items at your 9:00 a.m. meeting with DKS and staff on July 30th. In the event that DKS is unable to assist us in a timely manner with this problem, it is imperative that staff of RT, SACOG, City Planning and the City Traffic Engineer meet to select the most appropriate alignment. In the meantime I will inform Council Members Shore and Robie of the situation.

Please let me know your thoughts before the July 30th meeting. If you or your staff have any questions concerning this matter, please contact Mr. Stephen L. Jenkins, our Project Coordinator on the North Natomas project, at 449-5381.

Sincerely,


Marty Van Duyn
Planning Director

MVD:SLJ:pkb
attachments

- cc: Walter J. Slipe
- Mac Mailles
- Councilman Shore
- Councilwoman Robie
- Gary Stonehouse
- Mel Johnson
- Jim Bloodgood
- Tom Sparks
- Keith Martin
- Roger Dickenson
- Mike Wiley
- Gene Moir

TOKE MASUDA
KATHY MOLLOY
CLIF CARSTENS
DIANA PARKER



REGIONAL TRANSIT

MAILING ADDRESS P.O. BOX 2110 • SACRAMENTO, CA 95812-2110 • (916) 321-2800

EXHIBIT "B"

November 22, 1989

Stephen L. Jenkins
City of Sacramento
Department of Public Works
Transportation Division
1023 J Street
Sacramento CA 95814

NOV 27 1989

NAME OF DEVELOPMENT: North Natomas Freeway Improvements
CONTROL NUMBER: SCH #89052905
TYPE OF DOCUMENT: Negative Declaration
DATE RECEIVED AT RT: October 23, 1989

STAFF COMMENTS:

Regional Transit appreciates the City of Sacramento's consideration of RT comments in the Negative Declaration for the North Natomas Freeway Improvements project. However, RT requests a clarification of responses to two of the comments addressed by the City in the Negative Declaration.

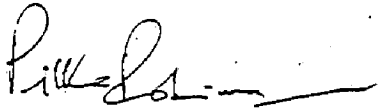
The response to Comment One states that the initial study/environmental assessment (IS/EA) is based on the assumption that any future proposal for light rail to utilize the Truxel corridor would cross I-80 by way of a separate structure. As the IS/EA states, RT is currently involved in a Systems Planning Study that includes a route refinement study for a rail alignment from Downtown to Metro Airport. At this time, this study does not place limitations to the alternatives for crossing I-80 at Truxel road, including joint use of an existing overcrossing. It is possible that a future light rail alignment on Truxel Road could have a direct impact on the proposed highway improvements because it will use the proposed Truxel Road overcrossing of I-80. Therefore, because this option is being studied by RT, it would be appropriate for the City and Caltrans to consider the potential joint-use for the overcrossing in their analysis for the Negative Declaration.

"B"

The response to Comment Four addresses several issues related to the provision of park-and-ride at the proposed interchanges. However, it does not directly address RT's comment. The response notes that traffic flow conditions on North Natomas streets are expected to operate at acceptable levels and that no additional traffic mitigation programs would be required. It also states that this conclusion is based on an additional traffic study of the area. RT requests that the City clarify this statement, because it appears to indicate that none of the traffic mitigation measures described in the North Natomas Community Plan are required (including the provision of park-and-ride facilities at major intersections and interchanges).

CONTACT PERSON(S):

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Pilka Robinson
Planning Manager

c: Michael Davis, City Planning
✓ Robert Lee, City Traffic Engineering
Thomas G. Matoff, General Manager, RT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, CA 94105

EXHIBIT
"C"

Received
3:50 PM
12-4-89
S. J. J.

12/4/89

Mr. Michael Cook
District Engineer
Federal Highways Administration
P.O. Box 1915
Sacramento, CA. 95814

Dear Mr. Cook:

The U.S. Environmental Protection Agency (EPA) has reviewed the revised Initial Study/Environmental Assessment (EA) entitled **North Natomas Freeway Improvements on Interstates 80 and 5** under authority of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Additional comments are enclosed. EPA appreciates the extension of our comment deadline from November 20 to December 4 in recognition of our earthquake caused coordination and administration difficulties.

The City of Sacramento proposes to expand the network of roads and freeway facilities in the Natomas Area. This expansion includes construction of three overcrossings of Interstate 5, modifications of two existing interchanges, construction of two new freeway interchanges, extension of Truxel Road north from San Juan Road, and construction of auxiliary lanes on Interstates 80 and 5 at various locations between existing and new interchanges. On the basis of the EA, the city officials determined that the proposed project did not merit further evaluation via an Environmental Impact Statement/Report (EIS/R).

The EA clearly states that the proposed project is an integral part of the North and South Natomas Community Plans and is considered essential and required mitigation for this planned development (p. 4-8 EA; p. 15 Hydrologic and Water Quality Evaluation Report; p. 12 Floodplain Evaluation Study). Furthermore, portions of the proposed project are conditions of approval for major projects in the area (p. 6-8, EA).

EPA continues to have grave concerns with the proposed project due to potential adverse indirect and cumulative impacts and potential conflicts between the proposed action and Federal,

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Regional, State and local initiatives. The EA does not sufficiently address the direct connection between the proposed project and a group of actions related by functional interdependence and geographic proximity. Of specific concern are potential impacts to efforts to meet the National Ambient Air Quality Standards, and potential continued violations of the special conditions of the EPA Sacramento Regional County Sanitation District Wastewater Treatment construction grant.

The EA does not adequately address mitigation of growth related vehicle and area source emissions which will result from development supported by the new interchanges and highway improvements. Any increase in vehicle emissions resulting from the proposed project may conflict with local efforts to develop more stringent Air Quality Plans and Federal efforts to enforce provisions of a forthcoming Federal Implementation Plan.

EPA believes that in view of Sacramento's very severe air pollution, the City of Sacramento should commit to full study and implementation in the near future of all feasible mitigation measures as stipulated in the Settlement Agreement for the North Natomas Community Plan and Sports Complex lawsuits. These measures include but are not limited to: HOV/bus lanes on roadways within and serving the area, parking management for sports events, dedication of a light rail corridor in North Natomas, interim use of LRT corridor as a busway, TSM requirements and other actions set forth in the North Natomas Community Plan.

Sacramento Regional County Sanitation District (SRCSD) has violated special conditions of a construction grant for wastewater treatment facilities by permitting sewer service within a North Natomas agricultural parcel designated as an "area of prohibition". As a result of this violation, EPA has requested repayment by SRCSD of grant funds and interest. SRCSD has appealed this decision in an assistance dispute which is currently under review. The proposed project potentially promotes further violations of the special conditions of the above construction grant by encouraging greater development in the "area of prohibition".

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We appreciate the opportunity to review this EA. If you have any concerns or questions, please call me at (415) 744-1051, FTS 744-1051, or have your staff contact Ms. Laura Fujii at (415) 744-1050, FTS 744-1050.

Sincerely,

Carolyn Yale (for JW)

Jacqueline Wyland, Chief
Office of Federal Activities

Enclosure: (2 pages)

cc: COE, Sacramento, Col. Jack A. Le Cuyer
ARB, Sacramento, Bob Fletcher
CalTrans, Dist. 3, Brian J. Smith
City of Sacramento, Sacramento, Stephen Jenkins
SACOG, Sacramento, Mike Hoffacker
Sacramento Metro AQMD, Sacramento, Norm Covell

"C"

AIR QUALITY COMMENTS

1. The analysis of impacts to ambient air quality assumes full buildout under the No Project alternative, despite acknowledgment that if any of the proposed actions are not taken then "some increment of growth would not occur" (p. 90). The EA thereby fails to fully address potential impacts of additional buildout that would occur as a result of greater vehicle access provided by the proposed project.

Current access to the area is extremely limited. Since the proposed actions would greatly expand access for vehicles, it is likely that additional buildout may be substantial. The additional air pollution which may occur is of great concern to EPA. EPA is responsible for protecting public health and for ensuring that adequate air quality plans are developed in the Sacramento area to protect public health. The Sacramento area has failed to adopt an adequate implementation plan and violations of air quality standards continue. Consequently, EPA is under court order to prepare a Federal Implementation Plan. Federal, State, Regional and local efforts to address air quality problems may be greatly exacerbated by projects which increase and add to the air quality problems.

EPA recommends that the FHWA and City of Sacramento fully address possible adverse impacts of potential increases in emissions projected for motor vehicle traffic (automobiles, trucks, motorcycles, etc.) associated with development which may occur as a result of the proposed project. The possibility of increased violations of air quality standards, and measures to mitigate potential adverse health impacts should also be addressed.

2. Response to October 5, 1989 SACOG letter.

a. Page 1. SACOG objects to the EPA impression that they have the authority to give SACOG guidance on conformity of highway projects.

EPA is responsible for implementation of the Clean Air Act and ensuring that the Act is carried out and fully implemented by all agencies whose actions affect it. Under the Act, EPA has established requirements for conformity provisions in State Implementation Plans (1981 Federal Register). Under the Act, we are responsible for ensuring that locally-adopted Air Quality Plans fulfill those conformity requirements.



b. Page 2. It is the responsibility of FHWA to assure conformity for highway projects, not EPA. Unfortunately, since 1981 some EPA regional offices have attempted to insert themselves into the conformity process by making it appear that they have authority to require project level reviews.

Please refer to response #a. The Clean Air Act requires federal agencies to assure that no action that they take fails to conform to State and Federal Implementation Plans (SIPs and FIPs). It is also the Act that enjoins MPOs from approving "any project, program, or plan" which does not conform. EPA therefore feels project-level review is appropriate. As stated in a July 25, 1986 letter from EPA Administrator Lee Thomas to FHWA Administrator Barnhart, EPA believes that "EPA should continue to require SIPs to include procedures for the review of federal projects." Such reviews can reveal potential significant impacts to air quality. Furthermore, the EA indicates the potential for additional violations of eight-hour state and federal standards as a result of the proposed project (p. 65-68).

c. Page 3. Also, no guidelines on which to base conformity determinations have been given to MPO's.

EPA has provided conformity determination guidance to MPOs in general and specifically to SACOG in several letters (29 Jan 88, 5 Feb 88, 1 Mar 89). Federal Register citations are as follows: 45 FR 21590, April 1, 1980; 46 FR 7182, January 22, 1981; 52 FR 45055, November 24, 1987; and 53 FR 49494, December 7, 1988.

3. Both the North and South Natomas Community Plans recommend development of a system of on-street bicycle routes for the Natomas area (p. 44-45). What is being done to implement these recommendations?