



**DEPARTMENT OF GENERAL SERVICES**

**Real Estate Services Division - Asset Management Branch**

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March 25, 2009

Mr. Don Smith, Senior Planner  
Sacramento Regional Transit District  
P.O. Box 2110  
Sacramento, CA 95812-2110

SUBJECT: Downtown-Natomas-Airport (DNA) Light Rail  
MOS-1 Draft Environmental Impact Report

Dear Mr. Smith:

Thank you for the opportunity for the California Department of General Services (DGS) to comment on the Draft Environmental Impact Report (EIR) for the DNA Light Rail Transit MOS-1 Project (the Project), in the City of Sacramento.

The DGS is interested in the Project because the DGS owns 17.32 acres at 344 North 7<sup>th</sup> Street, at the intersection of North 7<sup>th</sup> Street and Richards Boulevard. This property is adjacent to a portion of the proposed one-mile DNA light rail extension, known as the MOS-1 Project, which would run from downtown Sacramento, along 7<sup>th</sup> Street to Richards Boulevard. The site is also across the street from the light rail station proposed to be constructed at the Township 9 Development. The DGS Office of State Publishing, State Printing Plant (SPP) provides printing and communication solutions for State, federal, county and city agencies, and is housed in 323,460 gross square foot in two buildings on this property. The DGS has had a vested interest as a land owner in this area for over 50 years, and has always seen this as a significant State-owned property, going back as far as 1953 when the SPP was constructed at the site.

- 4-1 The DGS appreciates that construction of the Project would help to promote increased urban densities around the transit station to be built at Richards Boulevard and North 7<sup>th</sup> Street. The DGS considers this beneficial because it would promote the economic vitality of the area and fulfill the community vision of Transit Oriented Development. Please note in the development of the Draft Program Environmental Impact Report, two assumptions were made regarding the SPP site. The first, to which the DGS has committed, includes the DGS
- 4-2 granting a future easement to allow for North 7<sup>th</sup> Street to be widened to four lanes, an action that would result in partial demolition of the SPP, and could be undertaken only when a new State Printing Plant has been constructed and is operational. The second assumption, on which the DGS has not had any detailed discussions with the City of Sacramento, includes the extension of Bannon Street through the SPP site parallel to Richards Boulevard

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- 4-2 cont'd. to North 7<sup>th</sup> Street. The DGS has a continued commitment to the State Printing Plant site, therefore we cannot agree to any activity that would affect the site until decisions are made regarding its long-term use. Additionally, there is a 20-foot wide Pacific Gas and Electric (PG&E) power easement improved with an overhead 12 kw line crossing the property above ground midway on the property. PG&E's rights under the easement run with the land,
- 4-3 therefore negotiations with PG&E must be taken into consideration for any future development plans for the site.
- 4-4 As a property owner adjacent to the Project site, the DGS is concerned with the effect the Project's construction would have on the area immediately surrounding the SPP, the impact that a potential shortage of parking in the area could have on the SPP site, the effects that increased traffic would bring to the neighborhood, and the possible safety issues that could result with the establishment of new light rail stations and parking areas.
- 4-5 Construction activities on this phase of the Project include substantial work planned to the roads in the Richards neighborhood, including utility relocation, which would be the most intensive along North 7<sup>th</sup> Street and Richards Boulevard. This would significantly impact access for the businesses along Richards Boulevard, potentially including access interruption to the State Printing Plant by its employees and customers. The SPP operates three shifts per day. For six months of the year, crews run on Saturday and Sunday, as well. Approximately 480 employees work at the SPP. Most SPP employees commute in their own vehicles and there is no close public parking. During shift changes, 405 employees arrive and leave the SPP parking lot at the same time. Construction could cause periodic blocking of SPP driveways, and lead to congestion, unexpected traffic delays, and lost productivity. Access to 320 employee spaces during shift changes is critical to the operation of the presses and bindery equipment.
- 4-6 The traffic coming to and from the new station at North 7<sup>th</sup> Street and Richards Boulevard would result in traffic increases on some roadways in the surrounding neighborhood, including some intersection impacts related to increases in delay due to new at-grade rail crossings.
- 4-7 Lastly, the DGS is concerned about any safety and security issues that might arise from the operation of the new station at Richards Boulevard and North 7<sup>th</sup> Street.

Thank you again for the opportunity to respond to the Draft Environmental Impact Report for the DNA Light Rail Transit MOS-1 Project, and we hope the information we have shared is useful to you. If you have any questions, please contact Liz Ames at (916) 376-1831.

Sincerely,



Zachary Miller  
Assistant Branch Chief

## **Response to Comments**

**Submitted by: Zachary Miller, Assistant Branch Chief**

**Real Estate Services Division – Department of General Services**

**26 March 2009**

### **4-1**

Comment noted. Thank you for your support of the proposed project.

### **4-2**

Comment is noted regarding DGS commitment to granting a future easement to allow for North 7th Street to be widened to four lanes, after a new SPP is constructed and operational. Comment regarding DGS' concerns over the proposed future extension of Bannon Street through the SPP site is also noted. As noted in the DEIR on page 5.2-19 and illustrated in Figure 5.2-5, future proposed roadways in the study area were based upon roadway geometrics contained in the City of Sacramento's recently adopted Railyards EIR.

### **4-3**

The DNA MOS-1 Project would not affect PG&E 12kV line or the associated 20-foot-wide easement.

### **4-4**

The comment expresses concern over several effects including:

- Construction around the SPP (**see response 4-5**);
- Parking impacts in the area;
- Effects of increased traffic (**see response 4-6**); and
- Possible safety issues (**see response 4-7**).

This response discusses parking impacts in the area around the Richards Boulevard Station and on 7<sup>th</sup> Street between North B Street and Richards Boulevard with the City's requested outside lane alignment.

The determination of the significance of the parking impact is based upon the criteria specified in the thresholds of significance. For this document, the threshold of significance for parking is based upon the practice of the City of Sacramento. As noted in the DEIR on page 5.2-13, "a significant impact to parking would occur if the proposed project parking supply were less than the estimated parking demand." Additionally, the City deems that an impact is not significant if the project is consistent with the parking requirements stipulated in the City Code (zoning ordinance). Therefore, as the project is not required to provide parking per the City Code, the impact is determined to be "less than significant."

For clarification purposes, the threshold of significance for parking is revised to current City practice (see, for example, Railyards Specific Plan, Draft Environmental Impact Report, August 2007, page 6.12-60):

“For the purposes of this analysis, impacts to parking are considered significant if the project would:

- Result in parking demand that exceeds the available or planned parking supply. However, the impact would not be significant if the project is consistent with the parking requirements stipulated in the City Code.”

It is recognized that the Richards Boulevard Station will likely result in transit riders accessing the station via automobile. Such automobiles could be accommodated via existing on-street parking in the station vicinity. The demand for on-street parking is self-regulating; as nearby parking becomes occupied, it becomes less desirable for transit patrons to walk longer distances to access the station. As noted in the DEIR (page 5.2-19), existing on-street parking oriented to local industries and businesses can be readily accommodated in available private off-street lots; most on-street parking today in the Richards area occurs for convenience purposes.

At this time, no decisions have been made by the City regarding the supply, regulation, and potential cost of on-street parking in the vicinity of the Richards Boulevard Station. A potential exists for off-street station parking, although such plans are indefinite at this time. As noted in the response to 6-2, Regional Transit will coordinate with the City of Sacramento Parking Division regarding future parking options.

The proposed project would place light rail track in the number one travel lanes on North 7<sup>th</sup> Street between Richards Boulevard and North B Street and would not eliminate parking. Comments on the DEIR received from the City of Sacramento request modification of the proposed line to locate track in the number two travel lanes. This would require elimination of all parking on both sides of North 7<sup>th</sup> Street.

Based on midday field reviews conducted on 3/26/09, less than half of the approximately 69 available on-street spaces were occupied; 22 vehicles were parked on the west side, and 7 vehicles and 1 big rig truck were parked on the east side of North 7<sup>th</sup> Street between North B Street and Richards Boulevard. The subject block has 40 parking / loading spaces along the west curb, and 29 spaces along the east curb.

Within one block of the subject block, parking is available on dirt shoulders on North B Street east and west of North 7<sup>th</sup> Street. There were 42 available spaces along the south side of North B Street west of North 7<sup>th</sup> Street, and 31 available spaces on the south side of North B Street east of North 7<sup>th</sup> Street.

Occupancy surveys conducted in March 2009 show overall occupancy in the area is very low. While moving track from the number one to the number two travel lanes would eliminate on-street parking, adequate additional parking is available within one block.

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#### 4-5

Regional Transit recognizes construction could include disruptions to the transportation network near the SPP, including the possibility of temporary lane closures, street closures, sidewalk closures, and bikeway closures. Pedestrian, bicycle, and transit access may be disrupted. Heavy vehicles may access the site and may need to be staged for construction. These activities could result in degraded roadway operating conditions.

Prior to beginning of construction, a construction traffic and parking management plan would be prepared by Regional Transit to the satisfaction of the City traffic engineer and subject to review by all affected agencies. The plan would ensure that acceptable operating conditions on local roadways and freeway facilities are maintained. The plan would include:

- The number of truck trips, time, and day of street closures.
- Time of day of arrival and departure of trucks.
- Limitations on the size and type of trucks, provision of a staging area with a limitation on the number of trucks that can be waiting.
- Provision of a truck circulation pattern
- Provision of driveway access plan so that safe vehicular, pedestrian, and bicycle movements are maintained (e.g., steel plates, minimum distances of open trenches, and private vehicle pick up and drop off areas).
- Maintain safe and efficient access routes for emergency vehicles.
- Manual traffic control when necessary.
- Proper advance warning and Construction posted signage concerning street closures.
- Provisions for pedestrian safety.

A copy of the construction traffic management plan would be submitted to local emergency response agencies and these agencies should be notified at least 14 days before the commencement of construction that would partially or fully obstruct roadways.

Per Section 3.1, Project Description of the Draft EIR, the LRT tracks from North B Street to Richards Boulevard would be supported by a 12 to 18-inch thick track slab. Excavation can be performed underneath a track slab without the need for extensive shoring or reconstruction of the track.

#### **4-6**

Transportation and Circulation are discussed in Section 5.2-1 of the DEIR. As noted in the DEIR on pages 5.2-15 and 5.2-22, changes in traffic distribution with the project may increase volumes at some study area intersections and decrease volumes at others. At stop-sign controlled intersections, side street delay will increase. However, the changes in intersection operating conditions do not exceed the standards of significance for impacts to intersections in the Richards Area.

#### **4-7**

As described on page 4.10-2 of the DNA PEIR, “security for the existing light rail system consists of a combination of contracted law enforcement officers, RT transit officers, and contract private security guards. RT maintains a fixed-term contract with both the Sacramento City Police Department and Sacramento County Sheriff’s Department. The contracts call for each department to provide officers/deputies and management personnel expressly dedicated to providing for the safety and security of RT’s passengers, employees, and facilities. These law enforcement officers work closely with local law enforcement to prevent and respond to crimes and to address quality-of-life issues at Park-and-Ride facilities, at stations, and on light rail and bus vehicles.

The RT police force responds to emergency calls and patrols the transit system. Security forces are also contracted to be present on the RT vehicles, at stations, and in Park-and-Ride lots to serve as a deterrent to criminal activities and to provide customer service. Security on light rail and bus vehicles is provided in the evenings, seven days a week. Currently, most of the security guards are deployed at Park-and-Ride lots and light rail stations.”