



**CITY OF SACRAMENTO
CALIFORNIA**

DEVELOPMENT SERVICES DEPARTMENT

ENVIRONMENTAL CLEARINGHOUSE COMMITTEE

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ENVIRONMENTAL PLANNING SERVICES
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March 26, 2009

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

SUBJECT: MOS -1 Draft Environmental Impact Report Comments

Dear Mr. Smith,

The City of Sacramento, Environmental Planning Services, has received comments on the above mentioned project from the City Department of Utilities. These comments are attached and are in addition to the comments listed below.

- 7A-1
- In December 2007, the City adopted the Railyards Specific Plan. In doing so, the City amended the 1994 Facility Element of the Railyards Specific Plan and Richards Boulevard Area Plan to delete the Railyards Specific Plan area from the Facility Element and revise the circulation light rail system plans to incorporate the Sacramento Railyards Specific Plan Modifications, rescinded the 1994 Railyards Specific Plan.
 - In May of 2008 the Richards Boulevard Redevelopment Plan Amendment separated the Richards Boulevard and Railyards area and renamed the Richards Boulevard Redevelopment Plan Areas to the River District.
 - On March 3, 2008, the City of Sacramento adopted findings certifying the EIR and approving the 2030 General Plan. The 1988 General Plan is superseded by the 2030 General Plan.

We appreciate the opportunity to provide comments on the draft Environmental Impact Report. We are forwarding the comments received to date. If you have any questions, please do not hesitate to contact us.

Sincerely,


Scott Johnson
Environmental Planning Services

Attachments

cc: ECC 09-001

Response to Comments
Submitted by: Scott Johnson
City of Sacramento – Development Services Department
Environmental Planning Services
26 March 2009

7A-1

Comment noted. This information will be used to update the description of documents that were used in the preparation of the Draft EIR.



DEPARTMENT
OF UTILITIES

ENGINEERING
SERVICES DIVISION

CITY OF SACRAMENTO
CALIFORNIA

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March 20, 2009
906750:RA:ra

MEMORANDUM

TO: Scott Johnson, Development Services Department
John Law

FROM: Robert Armijo, Department of Utilities

SUBJECT: **DNA Light Rail Transit MOS-1 Project Draft EIR– DOU Comments**

Comments:

Please see comments made by Hong Lin on 3/19/20 on this EIR concerning Storm Water Quality. These comments are the remainder of the comments from the Department of Utilities (DOU) on this draft EIR:

- 7B-1 | 1. No discussion was found support or elaborating on relocating water, sewer and drainage facilities in 7th Street.
- 7B-2 | 2. Any modifications and improvements to the floodgate at 7th Street should be accomplished in a way that the floodgate remains fully functional and to the satisfaction of the DOU. That floodgate is part of the secondary levee system that protects the downtown area and should be preserved.
- 7B-3 | 3. Any relocation of City Utilities should be made at a distance from the tracks that are safe for the maintenance and operations of those utilities.
- 7B-4 | 4. Any sewer and water facilities under the RT tracks should be encased in a carrier pipe to accommodate future maintenance and to avoid future impacts to DOU and RT service.
- 7B-5 | 5. Any relocated City utilities should be designed so that they can be maintained and in services at all times.
- 7B-6 | 6. Relocated City Utilities will be in accordance with City design and construction standards and to the Satisfaction of the DOU.

Response to Comments
Submitted by: Robert Armijo
City of Sacramento – Department of Utilities
Engineering Services Division
20 March 2009

7B-1

While there have been meetings with each of utility owners associated with the DNA MOS-1 Project, decisions have not yet been made regarding the individual utilities to be relocated or protected in place. However, it is anticipated with the use of track slabs that the utility relocations and associated construction impacts can be reduced. Section 3-1, page 3-3 of the Draft EIR listed utility relocations that may be required; subject to further discussions with each utility owner.

7B-2

RT met with Department of Utilities Representatives on 11/13/08 to discuss the floodgate specifically. The DNA MOS-1 Project would pass between the floodgates, and would not affect their operation. RT will provide 100% plans for the DNA MOS-1 Project for the City's review, approval, and signature prior to construction in the public right-of-way.

7B-3 through 7B-6

RT will provide 100% utility relocation plans for the City's review, approval, and signature prior to construction.

March 19, 2009

To: Scott Johnson, Environmental Planning Services

From: Hong Lin, Water Quality Section, Department of Utilities

Subject: Comments to DNA Light Rail Transit MOS-1 Project Initial Study

I have reviewed the Initial Study Section III, water quality section (page 13 to 15) for the DNA Light Rail Transit MOS-1 Project. The following comments are offered for consideration:

- 7C-1 | 1. Most of the project area will be in the City's Combined Sewer System (CSS) area, which is not covered under City's municipal separate storm sewer system (MS4) NPDES permit. The on-site treatment of the stormwater runoff would not be required since the CSS flows are treated by the Sacramento Regional County Sanitation District. However, the runoff flow from the additional impervious area needs to be calculated and included in the drainage/CSS study.
- 7C-2 | 2. Construction phase stormwater runoff control is not adequately addressed in the Initial Study. In addition to complying with the City's Grading, Erosion and Sediment Control Ordinance, construction activities disturbing 1 or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit 99-08-DWQ) from the State Water Resource Control Board (State Board). The applicant needs to check if the project is subject to General Permit. If so, the applicant/developer would be required to file a Notice of Intent with the State Board to obtain a General Construction Permit prior to disturbance of the site and construction of the proposed project. The permit requires the applicant prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The Erosion and Sediment Control (ESC) Plan required by the City is only a part of the SWPPP. Some required elements of a SWPPP include: (1) site description addressing the elements and characteristics specific to the site, (2) descriptions of BMPs for erosion and sediment controls, (3) BMPs for construction waste handling and disposal, (4) implementation of approved local plans, (5) proposed post-construction controls, including description of local post-construction erosion and sediment control requirements, and (6) non-storm water management.
- 7C-3 | 3. This project is located within the Railyards project area. The impact on the water quality, specifically the increased runoff volume, may be addressed through incorporated efforts with the Railyards project.
- 7C-4 | 4. The applicant needs to provide additional information on how the Contractor will ensure that project-related excavation would not result in substantial changes in groundwater flow or quality.

If you have any questions or need further clarifications of the above comments, feel free to contact me at 808-1449 or email hlin@cityofsacramento.org.

Response to Comments
Submitted by: Hong Lin
City of Sacramento – Department of Utilities
Water Quality Section
19 March 2009

7C-1

We concur. Calculations will be provided to the City showing the change in impervious area and the resulting change in stormwater runoff. From the Union Pacific Railroad Underpass to North B Street, a sidewalk on the east side of 7th Street will be replaced by ballasted track. This reduction in impervious area may more than compensate for the platforms at the 7th and Richards Station and minor roadway widening between G and F Streets.

7C-2

RT will file A Notice of Intent (NOI) with the Regional Water Quality Control Board (RWQCB) for this project. The Erosion and Sediment Control Plan (ESC) and the SWPPP will be submitted to the City for approval by RT's contractor. This way, the contractor can design the temporary BMP's so they do not interfere with construction operations. Several BMP's may be used:

- Straw bales or gravel bags around existing drop inlets
- Straw wattles to prevent runoff from construction site
- Silt fencing to prevent runoff from construction site
- Siltation pond to capture runoff from the construction site
- Baker tanks for storage and treatment of construction site runoff

7C-3

We concur. See response to 7C-1 above. It is likely that runoff will decrease within the Railyards project area.

7C-4

As described in Section 3.1, Project Description, of the Draft EIR, most excavation for the project will be shallow. The track slab will be between 12 and 18 inches deep. Ballasted track will be 24 to 36 inches deep. Supports for the overhead catenary poles may be cast-in-drilled hole foundations 10 to 15 feet deep. Station canopy supports at 7th and Richards may be deeper. Utility relocations have not been specified yet. It is possible that temporary construction dewatering could be required for utility relocations below groundwater. If so, RT's contractor would apply for a Dewatering Permit from the

RWQCB and they would comply with the conditions included in the permit, which could include requirements for sampling, testing, and handling of effluent.