Downtown/Natomas/Airport Corridor

in the City and County of Sacramento

FINAL

Program Environmental Impact Report

April 2008

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Sacramento Regional Transit District

Final Program Environmental Impact Report

for the

Downtown/Natomas/Airport Corridor

in the City and County of Sacramento

Prepared in Accordance with the

California Environmental Quality Act, PRC 21000 *et seq*.; and the State of California CEQA Guidelines, California Administrative Code, 15000 *et seq*.

by the

SACRAMENTO REGIONAL TRANSIT DISTRICT

April 2008

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CHAPTER 1.0: INTRODUCTION

This Final Program Environmental Impact Report (PEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines (Section 15132). The Sacramento Regional Transit District (RT) is the lead agency for the environmental review of the Downtown-Natomas-Airport (DNA) project and has the principal responsibility for approving the project. As a California special district, RT's action is subject to CEQA. This Final PEIR summarizes the expected environmental impacts resulting from approval and responds to comments received on the Draft PEIR.

1.1 PURPOSE OF THE PEIR

As described in State CEQA Guidelines Section 15121(a), an EIR is an informational document for decision-makers and the general public that analyzes the significant environmental impacts of a project, identifies possible ways to minimize those impacts found to be significant, and evaluates alternatives to the project that could reduce or avoid adverse environmental impacts. Preparation of an environmental impact report is required prior to approving any project that may have a significant effect on the environment.

This document is the environmental analysis of the DNA project. It is a program-level analysis of the entire project – focused documents will be prepared for each individual segment as those projects are advanced to subsequent stages of project development. As a programmatic document, this analysis addresses the general environmental impacts of the DNA project as a whole based upon the general alignment adopted by RT in 2003.

As indicated in the CEQA Guidelines (Section 15168), a PEIR can be prepared on a series of related actions that can be characterized as one large project. The DNA project is a series of related actions made up of individual segments that will be implemented over time. These actions are expected to be phased over a period of years depending on available funding. Tiering of environmental analyses is appropriate when the sequence of analysis is from a program-level to a project-level. This approach can eliminate repetitive discussions of the same issues allowing the later EIR to focus solely on the issues specific to the later project.

The Draft PEIR was circulated for public and agency review on December 28, 2007. The 60-day comment period closed on February 26, 2008. During the review period, the Draft PEIR was discussed at five meetings as follows.

- Presentation to the DNA Technical Review Panel on January 31, 2008.
- Presentation to the DNA Citizen Review Panel on February 1, 2008.
- Open Houses for the public on February 9, 2008 and February 11, 2008.
- Public Hearing with the RT Board of Directors on February 25, 2008.

The PEIR has been updated in response to comments received during the review period.

1.2 ORGANIZATION OF THE FINAL PEIR

The PEIR evaluates the environmental impacts of the entire DNA project to the greatest extent possible. In accordance with State CEQA Guidelines (Section 15126), this PEIR

should be used as the primary document to evaluate all subsequent planning and permitting actions associated with the project. Subsequent actions that may be associated with the project are identified in Section 2.0 (Project Description) of the Draft PEIR (provided as an attachment to this document).

This document is organized as follows:

- Chapter 1: Introduction – describes the scope of the document and objectives of the project

- Chapter 2: Executive Summary – updated from the Draft PEIR in response to comments received during the review period

- Chapter 3: Comments and Responses

- Chapter 4: Errata – presents changes that were made to the text of the Draft PEIR in response to public and agency comments. Correction and revisions to the Draft PEIR are represented by strike-through (~~strikeout~~) for deleted text and underlined (<u>underline</u>) for added text.

- Attachment – Draft PEIR. The updated Draft PEIR, including all appendices, is included on a CD as an attachment to this document. Changes from the Errata chapter are shown in ~~strikeout~~ and <u>underline</u> text.

1.3 INTENDED USES OF THE PEIR

RT's intended use of this document is to support a determination that the appropriate means of implementing transit improvements along the DNA Corridor is to construct a light rail system on the Truxel alignment. This document also will be used to support preparation of future project-level environmental documents. As described in the CEQA Guidelines (Section 15168), a program-level document can be incorporated into future project-level documents to:

- Provide a basis for determining whether subsequent phases may have significant environmental effects;

- Help address regional influences, secondary effects, cumulative impacts, broad alternatives, and other elements that apply to the program as a whole; and

- Focus the subsequent evaluation on new effects that had not been considered before.

During future, project-level analysis of each phase, there is likely to be substantial participation by federal agencies. RT assumes that one or more future phases may be subject to the National Environmental Policy Act, with the Federal Transit Administration as the federal lead agency and with additional participation by other federal agencies with regulatory authority over the DNA project.

Chapter 2.0: EXECUTIVE SUMMARY

2.1 SCOPE AND INTENDED USE OF THIS DOCUMENT

This document is the environmental analysis of the Downtown-Natomas-Airport (DNA) project. It is a program-level analysis of the entire project – focused documents will be prepared for each individual segment as those projects are advanced to subsequent stages of project development. As a programmatic document, this analysis addresses the general environmental impacts of the DNA project as a whole based upon the general alignment adopted by the Sacramento Regional Transit District in 2003 (i.e., the Truxel alignment). Further analysis and final decisions on the exact alignment (e.g., side of the street, separate guideway, mixed-flow traffic) and exact design (e.g., architectural elements) will be made in conjunction with the more focused environmental documents to come.

The anticipated first phase of the DNA project is an alignment from Downtown along 7th Street to Richards Boulevard. Where relevant, information is presented in this document about this anticipated first segment.

The project proponent is the Sacramento Regional Transit District (RT). As a California special district, RT's action is subject to the California Environmental Quality Act (CEQA). This document is a Program Environmental Impact Report (PEIR) as required by CEQA. As indicated in the CEQA Guidelines (Section 15168), a PEIR can be prepared on a series of related actions that can be characterized as one large project. The DNA project is a series of related actions – individual segments will be implemented over time, expanding the project in length (eventually to the Airport) and in other ways (for example, widening a single-track starter segment to include both north and southbound tracks). These actions are expected to be phased over a period of years depending on available funding. A detailed analysis of environmental effects for these future phases would be speculative at this time because the future environmental setting could be substantially different than the current setting. Implementation timing has not yet been established, and exact alignment and design options have not yet been developed. These considerations support RT's determination that a PEIR is the appropriate level of environmental documentation at this time. Tiering of environmental analyses is appropriate when the sequence of analysis is from a program-level to a project-level. This approach can eliminate repetitive discussions of the same issues allowing the later EIR to focus solely on the issues specific to the later project.

RT's intended use of this document is to support a determination that the appropriate means of implementing transit improvements along the DNA Corridor is to construct a light rail system on the Truxel alignment. This document also will be used to support preparation of project-level environmental documents. As described in the CEQA Guidelines (Section 15168), a program-level document can be incorporated into future project-level documents to:

- Provide a basis for determining whether subsequent phases may have significant environmental effects;
- Help address regional influences, secondary effects, cumulative impacts, broad alternatives, and other elements that apply to the program as a whole; and

- Focus the subsequent evaluation on new effects that had not been considered before.

During future, project-level analysis of each phase, there is likely to be substantial participation by federal agencies. RT assumes that one or more future phases may be subject to the National Environmental Policy Act, with the Federal Transit Administration as the federal lead agency and with additional participation by other federal agencies with regulatory authority over the DNA project. At this time, there is no federal action on the project, and the PEIR is intended only to meet RT's obligations under CEQA.

2.2 INTRODUCTION

2.2.1 Definition of the DNA Study Area

The DNA study area, shown on Figure 2-1, extends 12.8 miles from 7th and H Streets in Downtown Sacramento to the Sacramento International Airport and includes the communities of Alkali Flat, South Natomas, North Natomas, and Metro Air Park. Between State Route (SR) 99 and Powerline Road, the study area traverses the Greenbriar property, which the Sacramento Local Agency Formation Commission approved for annexation into the City of Sacramento in April 2008. The study area was developed in 2002 to be sufficiently broad to encompass the entire range of alternatives under consideration at that time. See Chapter 5, Alternatives, for more information. This study area is also referred to as the "DNA Corridor."

2.2.2 Objectives of the Project

The primary objective of the DNA project is to provide a transit travel option in a high travel-demand corridor in the rapidly growing study area in Sacramento, California. Supporting objectives of the DNA project are to:

- Provide mobility improvements in the DNA Corridor;
- Provide environmental benefits in the Corridor;
- Improve systemwide operational efficiencies;
- Provide cost-effective transportation solutions; and
- Provide transportation improvements that are enhanced by transit-supportive land use plans and policies.

According to a report produced by the Center for Continuing Study of the California Economy, the Sacramento Region is poised for significant growth over the next 50 years. The number of jobs is projected to more than double to 1.9 million, while average household size will fall. Unless action is taken, the combination of these two factors will inevitably lead to urban sprawl and congestion within the region's transportation network. By taking a comprehensive planning or "smart growth" approach, SACOG, the designated Metropolitan Planning Organization for the Sacramento Region, hopes to avoid many of the problems associated with sprawl. The DNA study area residents and local organizations have embraced the "smart growth" approach through their planning efforts. A description of these planning efforts is presented below.

- **Population and Employment Growth Will Increase the Demand on the Transportation System.** According to the *2006 Metropolitan Transportation Plan*

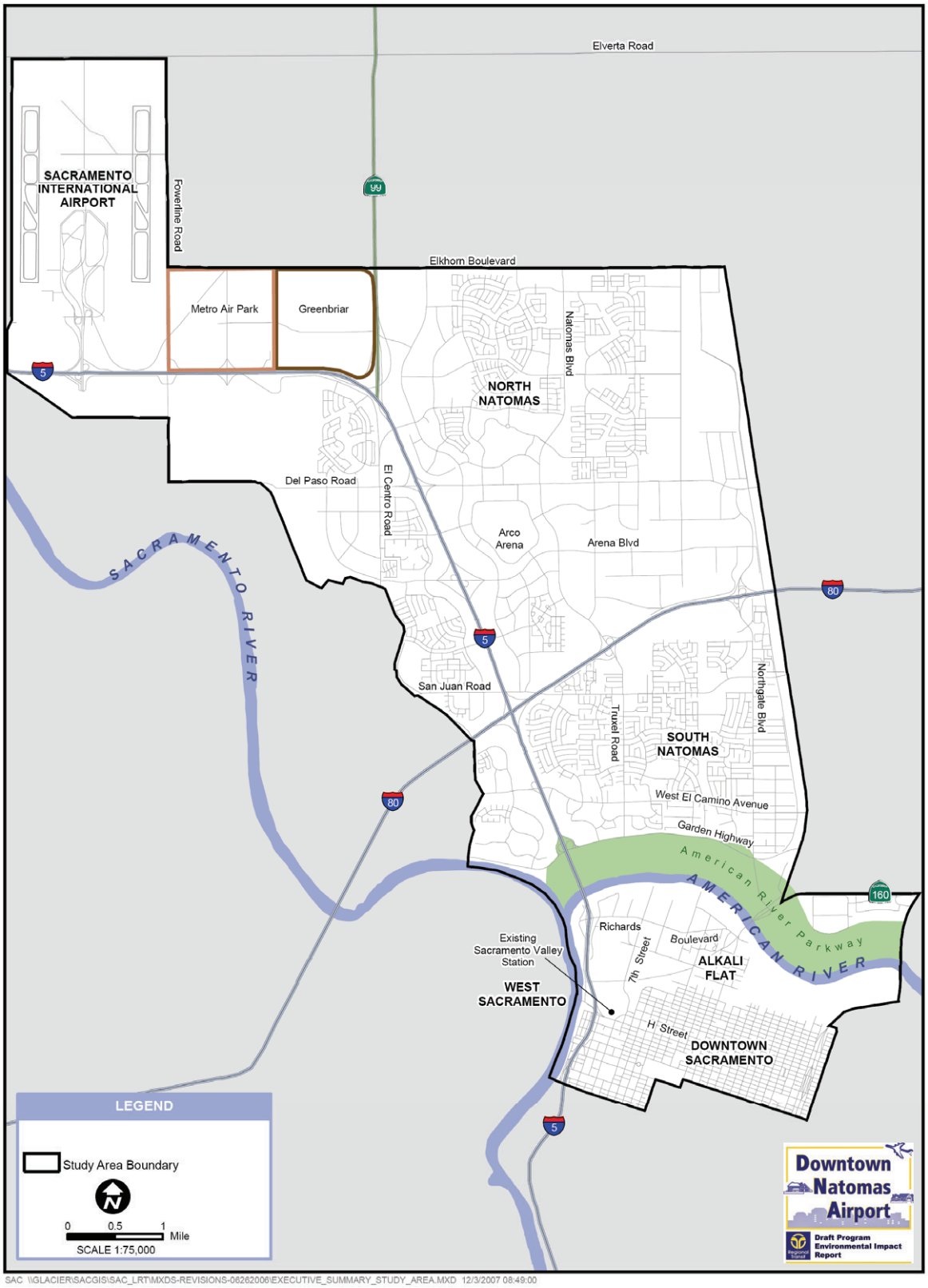

Figure 2-1
DNA Corridor Study Area

(MTP), by 2027 the number of households in the DNA study area is expected to increase by 149 percent and employment by 81 percent. These growth figures are the highest in the City of Sacramento. The rate of growth in North Natomas has exceeded City of Sacramento expectations, as evidenced by the development proposals that continue to be submitted to the City and County, indicating that growth will continue in the DNA Corridor.

- **Major New Development Projects.** New development proposals in North Natomas and around the Airport are now underway. Below are current plans that are under consideration:

  - Creation of a City/County "Natomas Joint Vision" that will guide the future development of 25,000 acres located in unincorporated Sacramento County immediately north of the Natomas area. A significant goal established by this vision is the adoption of smart growth principles that emphasize pedestrian and transit orientation by addressing density and efficient design that is interdependent on quality transit service with connections linking activity centers. Included in this project is 7,000 acres of urban reserve;

  - Greenbriar is a proposed residential and commercial development project on 577 acres between Metro Air Park and State Route 99. This project would include nearly 3,500 high-, medium-, and low-density homes; nearly 50 acres of commercial development; and a light rail station at the southern edge of the development that has been identified in this PEIR as an "optional" station to be built with developer fees;

  - The Natomas Panhandle is a project to build homes and retail on 1,465 acres between Elkhorn Blvd and I-80, east of the Corridor that will need an improved transit system to reduce increased dependence on single occupant vehicles and Interstate 5 (I-5);

  - Construction of Metro Air Park, a County-approved project just east of the Airport that will include 20 million square feet of warehouse, light manufacturing, office, retail space, and 950 hotel rooms for which developer fees will be collected for constructing a station adjacent to the development; and

  - The West Lakeside project would consist of homes built 133 acres in unincorporated Sacramento County at the northeast corner of Del Paso Road and the West Main Drain Canal, creating increased demand for improved transit.

  In addition, several Downtown development proposals in the DNA study area have been submitted to the City of Sacramento. These include the Railyards Redevelopment Plan and Township 9, as described below.

  - The Railyards Redevelopment Plan proposes development of the 240-acre Union Pacific Railroad property. The project, approved by the Sacramento City Council in December 2007, would consist of 11,000 homes, 1.3 million square feet of retail, and 2.9 million square feet of office space, hotels, restaurants, entertainment venues, and open space. Light rail stations are identified in the Plan adjacent to the proposed

Sacramento Intermodal Transportation Facility and on 7th Street south of North B Street; and

- The Township 9 Plan includes construction of approximately 2,700 homes, 69,000 square feet of retail, and 17.33 acres of open space on 65 acres along Richards Boulevard between 5th and 7th Streets. Plans for additional projects adjacent to this site include office and retail space development. The developer of this plan has dedicated land on its property for a light rail station and agreed to contribute payment of mitigation fees for station construction.

- **Continuous Planning Support.** Since 1984, there has been local and regional interest, and rising support to build light rail between Downtown and the Airport. In 1989, the Truxel Road Alignment was identified by RT, the City of Sacramento and Sacramento County as the preferred alignment. This decision was reinforced again in 1994 by the City's adoption of the North Natomas Community Plan, which identified a preferred alignment along Truxel Road, with right-of-way and station locations. As a result, the City has been requiring developers to dedicate right-of-way for the DNA alignment and contribute payment of mitigation fees for station construction.

  More recently, in polling conducted for the November 2004 campaign to extend the Measure A local transportation sales tax, over 60 percent of those surveyed indicated strong support for extending light rail to the Airport. As a result, the sales tax extension was approved and will provide $50 million for engineering and design of the DNA project.

  The SACOG Board of Directors has also shown support for transit in the DNA Corridor, evidenced by several actions:

  - In 2000, SACOG prepared the *Sacramento International Airport Transit Access Study*, which identified the need for increased transit access to the Airport using enhanced bus service or light rail;

  - In 2002, SACOG adopted the *Metropolitan Transportation Plan for 2025* that identified Truxel Road as the preferred transit alignment between Downtown, Natomas, and the Airport; and

  - In 2006, SACOG adopted the *Metropolitan Transportation Plan for 2027* that again identified Truxel Road as the preferred transit alignment between Downtown, Natomas, and the Airport.

  With broad community participation, SACOG also developed and adopted the *Blueprint: Transportation/Land Use Study for 2050* (Blueprint). This is the first comprehensive examination of the regional land use patterns in the Sacramento Region and was approved in December 2004 by the SACOG Board of Directors. The Blueprint emphasizes why good land use decisions, such as encouraging infill development and improved transit, are needed, with the following facts:

  - By 2050, the six-county region is projected to grow by 1.7 million people, 1 million jobs, and 840,000 dwellings;

- Under existing development patterns, vehicle-miles traveled (VMT) per household are 41.9 miles per day. By 2050, this is projected to increase to 47.2 miles per household per day. Under the Preferred Blueprint Scenario, VMT will decline to 34.9 miles per day;

- Existing transit mode share of regional commute trips is 3.3 percent. Under the Preferred Blueprint Scenario, mode split is to increase to 7.6 percent;

- Existing transit mode share for Downtown Sacramento is 19 percent. Under the Preferred Blueprint, this is to increase to 41 percent; and

- Existing regional transit trips per day is 93,000. Under the Preferred Blueprint, this is to increase to 903,000.

In 2004, Sacramento County included the DNA line as part of its long-range master plan update for the Airport. The light rail station is shown in that plan as being located within the new Airport terminal and providing passengers with direct access to check-in facilities. On August 29, 2006, the Board of Supervisors approved construction of the new Airport terminal that will be operational by 2011, with the dedicated light rail station area. The Airport has already contributed $1 million to RT to begin preliminary engineering on the alignment through the airport property and the end-of-line light rail station.

Also in 2004, the City of Sacramento adopted plans for construction of a new Downtown Intermodal Transportation Facility to provide connections for local and express bus and light rail services via the DNA line; intercity buses; the Capitol Corridor commuter rail; and Amtrak. The Capitol Corridor passenger train service provides 32 trains daily between Sacramento and the San Francisco Bay Area. It is currently the third busiest Amtrak-provided route in the nation with nearly 1.3 million annual riders, a figure that has tripled within the past seven years. The plan for the Intermodal Facility incorporates the future DNA light rail alignment and station.

- **Increased Demand for Transit Services.** Since the first light rail line opened for service in 1987, RT service and ridership has continued to grow. RT completed its first light rail expansion along the Highway 50 Corridor in September 1998 with the opening of the Mather Field/Mills Station. Five years later (September 2003) RT opened the first phase of the South Line, a 6.3-mile extension to South Sacramento. In June 2004, light rail was extended from the Mather Field/Mills Station to Sunrise Boulevard, and on October 15, 2005, a 7.4-mile extension from the Sunrise Station to the City of Folsom was opened. In December of 2006, the final leg of the Gold Line project opened, extending 0.5 mile to the Downtown Sacramento Valley Station, connecting light rail with Amtrak inter-city and Capitol Corridor services as well as local and commuter buses. The DNA project will be a continuation of the Gold Line, north to the Airport

- **Increased Traffic Congestion**. Due to rapid urbanization in the DNA study area, traffic congestion in the Corridor is projected to increase significantly by 2027. Traffic volumes are projected to increase from 40 to 100 percent on I-5; 57 percent on Interstate 80 (I-80); and 60 intersections would operate at failure (LOS “F”) in the DNA study area in 2027.

- **Increased Airport Passenger Demand**. According to the projections prepared for the *Draft Sacramento International Airport Master Plan Study*, passenger traffic is expected to increase at an average annual rate of 3.5 percent between 1999 and 2020, resulting in between 15 and 16 million passengers annually by 2020. On an average day for the peak month of passenger activity in 2020, the Airport will have 22,000 passenger origins and destinations, twice the current number. By 2027, origins and destinations to the Airport will have increased 69 percent over 2000 estimates, and about two-thirds of these passengers will be coming to or from the RT service area.

- **Transit Service Needs**. RT needs to expand its system for the following reasons:

  - The RT service area receives significantly less transit service than other comparably sized cities in the United States;

  - An expanded transit system, especially in the high growth DNA Corridor, will promote economic development, reduce traffic congestion, and help the region remain competitive with other regions;

  - Intermodal connections are critical to the long-term success of transportation systems. RT presently has no bus service to the Airport;

  - Many of the region's students, seniors, disabled persons, and other non-driver populations depend on public transit for access to jobs and public services. The DNA study area has a significant percentage of low-income and minority households that could benefit greatly from transit linking Downtown Sacramento, South and North Natomas, and the Airport; and

  - Because much of the DNA Corridor has only recently been developed, transit service in the area has been provided only at modest levels based on available funding. However, ongoing and past planning efforts have identified the proposed project as the preferred transportation solution to provide transit service in the Corridor.

- **Air Quality Nonattainment Area**. The project would be located in a federally designated nonattainment area for air quality and, therefore, must meet transportation conformity requirements at the regional and project levels. The DNA project would provide a small benefit to the region's air quality by reducing vehicle miles traveled by approximately 0.02 percent as compared to future conditions.

2.3 PROJECT DESCRIPTION

The DNA project would provide light rail service in the Corridor by extending the Gold Line from approximately 7th and H Streets to the Airport. The recent extension of the Gold Line to the Sacramento Valley Station connects to the southern edge of the Corridor. The DNA project would build on this extension, constructing a new transit guideway from the relocated Sacramento Valley Station (part of the proposed Intermodal Facility) to the Airport.

Light rail service would be provided along a 12.8-mile alignment through South and North Natomas to the Airport. Figure 2-2 illustrates the alignment. The project description includes trackway, station locations, power substations, a maintenance facility, and light rail vehicle storage yards

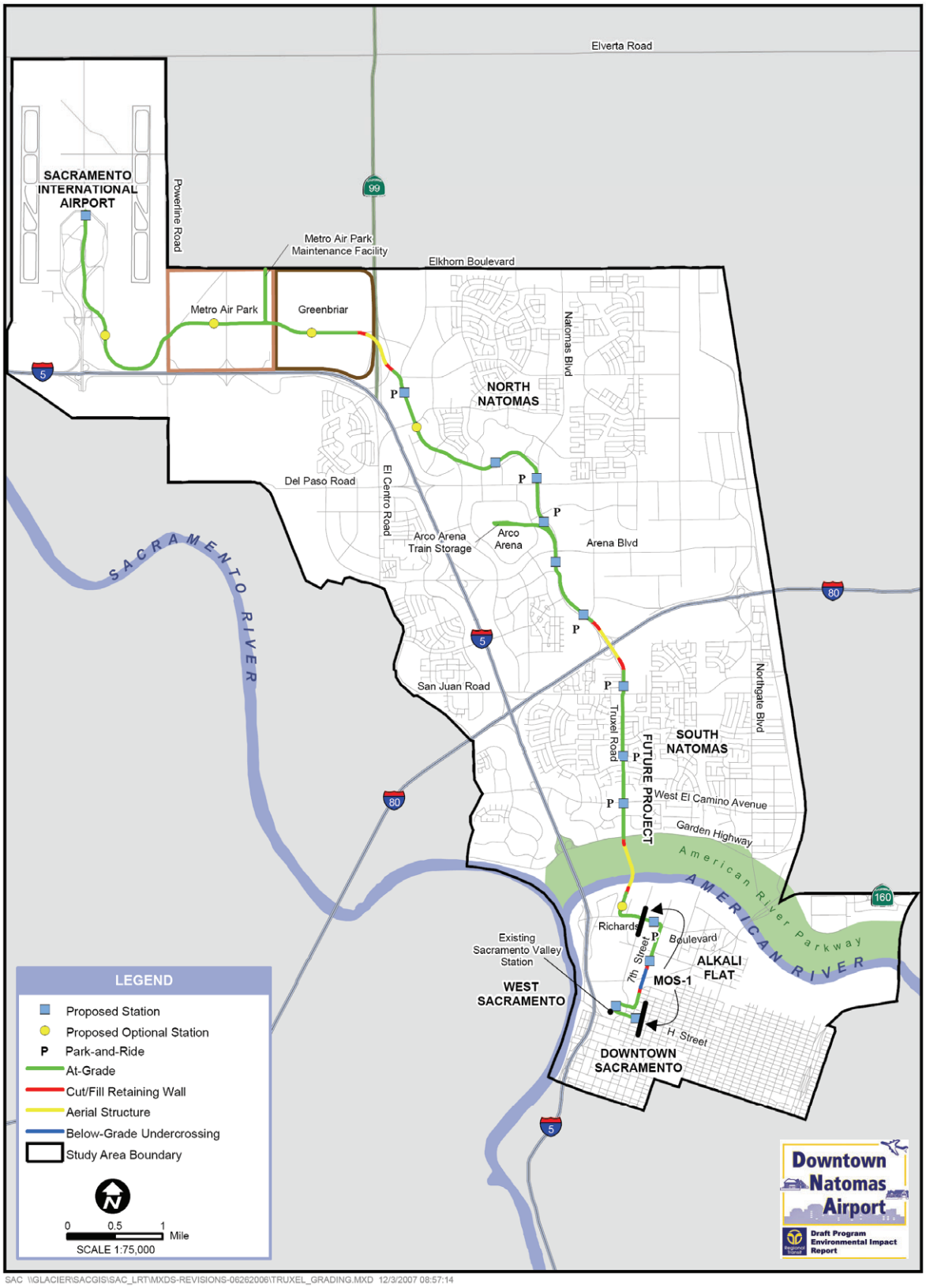

Figure 2-2
DNA Project

2.3.1 Alignment

The alignment would originate at 7th and H Streets, adding a second track parallel to the existing Gold Line. Heading west on H Street, the DNA line would then loop north on the east side of the intermodal site, west of the proposed extension of 5th Street to the relocated Sacramento Valley Station (part of the future Intermodal Facility)[1].

Continuing east, the loop would then connect to a future extension of F Street and continue north along 7th Street, operating through the existing 7th Street undercrossing of the Union Pacific Railroad. From this point north, the alignment would continue to follow North 7th Street to Richards Boulevard. At North 7th Street and Richards Boulevard, the alignment would cross Richards Boulevard and turn to the west to follow a semi-exclusive guideway on the north side of the street.

The alignment through the Railyards assumes that several improvement projects have been built. These projects are separate from the DNA project but are necessary for its viability. These projects include:

- Relocation of the Union Pacific mainline rail tracks north of their current location;
- Relocation of the Gold Line and station so that they are parallel and west of 5th Street to align near the new Sacramento Valley Station location; and
- Construction of a new light rail platform to serve the Gold Line.

The alignment would then turn north towards the American River. A new river crossing over the American River would be built approximately 1,200 feet east of the existing I-5 bridge. Bicycle and pedestrian lanes also would be provided on the river crossing, with direct access from the bridge structure to the American River Parkway trail system. By incorporating a pedestrian and bicycle facility with the American River Crossing, residents of Natomas will have a direct link to this regionally significant trail.

The alignment would continue on an elevated structure through the American River Parkway to Garden Highway, where it would touch down and enter into the median of Truxel Road and operate in a mixed flow with vehicular traffic. The alignment would continue at grade in mixed flow on Truxel Road from Garden Highway to San Juan Road. North of San Juan Road, the guideway would shift to the east side of the street into semi-exclusive right-of-way and transition to a section of retained fill, then move onto a new double-track structure over the I-80 Interchange located north of the Natomas High School playing fields.

The alignment would descend to grade just south of Gateway Park Boulevard and continue at grade in an existing semi-exclusive right-of-way. The alignment would cross to the west side of Truxel Road just south of Natomas Crossing Drive. From this location, the alignment

[1] In addition, a track would be built along 7th Street to by-pass the loop that passes by the Federal Courthouse. This “emergency” by-pass was added in response to national safety and security concerns raised by the U.S. District Court that could result in occasional, temporary closures of H Street.

would be located on an existing semi-exclusive right-of-way, adjacent to the west side of Truxel Road and continue north to Del Paso Road. At-grade crossings would be constructed where roadways cross the semi-exclusive right-of-way between Gateway Park Drive and Del Paso Road. A spur track into the ARCO Arena property could be built to provide direct arena access during special events. This optional track also could be used as a mid-line vehicle storage area.

After crossing Del Paso Road, the alignment would proceed north along Natomas Boulevard (north of Del Paso Road, Truxel Road changes name to Natomas Boulevard). At New Market Drive, the alignment would turn northwest and proceed in the median around the Natomas Town Center Education Complex toward the Natomas Town Center. West of the Town Center, the alignment would again turn north and follow East Commerce Parkway in a semi-exclusive right-of-way adjacent to the east side of the roadway. At the intersection of Club Center Drive and East Commerce Parkway, the alignment would cross East Commerce Parkway at-grade and enter an exclusive transit right-of-way to reach SR 99 at the proposed Meister Way overcrossing.

This structure would span the freeway, with the alignment returning to grade west of SR 99. The alignment would continue along the south side or in the median of the future Meister Way through Greenbriar and Metro Air Park. West of Powerline Road, the alignment would continue on an exclusive right-of-way along the north side of an extended Elkhorn Boulevard into the Airport property. The alignment would remain adjacent and to the east of Elkhorn Boulevard in exclusive right-of-way as it curves northward crossing over Crossfield Drive. North of Crossfield Drive, the alignment would continue in an exclusive right-of-way between McNair Circle and Aviation Boulevard. The alignment would cross over the northbound lanes of Aviation Boulevard on a new aerial structure, and under the existing southbound Aviation Boulevard aerial structure.

After crossing under Aviation Boulevard, the alignment would shift to line up with the central axis of the new terminal building proposed by the Airport to be built south of the existing parking lot between Terminals A and B. The end-of-line station is proposed to be incorporated into this new building.

2.3.2 Stations

The DNA project would include 14 stations; of these, seven would have Park-and-Ride lots, for a total of 2,260 spaces. Additional locations have been designated as sites for optional stations, to be built either with private funds or at a later date as additional public funds become available. Park-and-Ride spaces are provided based on parking demand derived from the DNA ridership forecasting model. The impact of optional stations on Park-and-Ride demand was not assessed. Physical constraints of available property have resulted in fewer parking spaces available than the model depicted. To mitigate the impact of not fully meeting parking demand, recommendations for parking policies were developed and are described in Chapter 7 of Regional Transit's 2007 *Final Definition of Alternatives Report* (the public can review this report at Regional Transit, 1400 29th Street, Sacramento or www.dnart.org). The City of Sacramento currently has a program for establishing Residential Permit Parking Zones. It is recommended that this program be replicated in neighborhoods around new transit stations.

Each station would have a 400-foot-long platform to accommodate a maximum four-car train and would include platforms to satisfy accessibility requirements under the Americans with

Disabilities Act. The width of the station platform would vary from 16 feet for a side platform station to 28 feet for a center platform station. All stations would be at grade**.** These criteria are consistent with the existing RT system. Other amenities would include passenger shelters, telephones, bicycle racks and lockers, information kiosks, ticket vending machines, preferential access for pedestrians, enhancements for elderly and disabled passengers, lighting, and landscaping. When RT deploys real-time tracking equipment for RT buses, a bus arrival prediction system would be added to provide passengers with real-time information on connecting feeder bus service.

Stations will incorporate design features such as lighting to deter crime and all stations and trains will be patrolled by RT Police Services. On April 14, 2003, the RT Board of Directors adopted Ordinance 03-04-01, which permits authorities to remove people not using transit from station locations. (For additional details on proposed station characteristics, refer to the *Final Definition of Alternatives Report*.)

2.3.3 Traction Electrification System

Two different traction power supply distribution systems would be used as part of the Traction Electrification System for the Corridor. In Downtown, power would be provided by direct-suspension, single-contact wire electrically supplemented by below-ground parallel feeders. The remainder of the Corridor would use an auto-tensioned simple catenary system. Steel poles located in the middle of or adjacent to the tracks would support the overhead catenary wires. Sacramento Municipal Utility District would provide electrical power to the system through 13 traction power substations constructed along the Corridor. Each substation would be located in a secured, fenced area with a vehicle access road and would consist of a self-contained building approximately 15 feet high with a 15 feet by 40 feet linear dimension, installed on a concrete pad. A grounding grid with approximate dimensions of 25 feet by 50 feet also will be installed.

2.3.4 DNA Project and Feeder Bus Operating Plan

The DNA project includes a light rail route along with feeder buses and shuttles to serve the Corridor. Light rail would operate at 15-minute headways from Downtown Sacramento to the Airport and back. Service would be reduced to 30-minute headways during early morning and evening non-peak hours. Service in the Corridor would operate from 5:00 AM to 12:00 midnight on weekdays and from 6:00 AM to 12:00 midnight on weekends, consistent with current operations. Corridor trains would continue through Downtown Sacramento to serve the Gold Line (to Folsom); passengers on other routes would need to transfer trains in Downtown Sacramento to reach the Airport. Trains operate primarily at-grade with crossings that are controlled by traffic signals. Light rail vehicles would have signal preemption at all signalized intersections.

2.3.5 Maintenance and Vehicle Storage Facilities

The DNA project would require additional facilities for bus and light rail vehicle maintenance. Additional bus vehicles required for future phases of the DNA project would be maintained at the existing bus maintenance facility at McClellan Park. As a separate capital improvement project, the McClellan facility would be designed to accommodate an expanded bus fleet and the additional bus maintenance requirements of future phases of the DNA project.

RT does not have sufficient capacity in existing or planned light rail vehicle maintenance facilities to accommodate repair activities for the DNA project. A new maintenance facility in the Corridor is proposed to provide additional maintenance capacity. This facility would require a 15.5-acre site and would include an inspection pit, a car wash, a 4,000-square-foot maintenance building, overnight vehicle storage for up to 50 light rail vehicles, locker room and break room facilities for train operators, and a small parking lot for employee and maintenance-of-way vehicles. Employee hours would be set as appropriate for service needs. It was determined that a location along the eastern portion of Metro Air Park provided an appropriate site for a maintenance facility.

A separate light rail vehicle storage facility would be required for the DNA project. An analysis of potential vehicle storage sites for the DNA project was conducted based on proximity to the end of the line, light rail vehicle and maintenance vehicle access, required acreage, adopted and planned land uses, and proximity to sensitive land uses. Two sites were identified; the site next to ARCO Arena north of the existing Arena building met the criteria and has been incorporated into the DNA project as part of the spur track option.

2.3.6 Project Phasing

RT would like to construct the DNA project as soon as possible, but recognizes that phasing the project will be necessary because of project costs and other financial considerations. For this document, it is assumed that full implementation would occur by 2027. This date is consistent with the 2006 MTP, and allows this document to describe traffic and related impacts in a manner consistent with full implementation of the MTP. If financial considerations allow, RT will fully develop the DNA project before 2027.

At this time, RT expects to begin detailed design and project-level environmental review for the first phase of the DNA project from Downtown to Richards Boulevard. This first phase is called MOS-1 because it is the initial minimum operable segment identified by RT. Where available, information specific to MOS-1 is included in the analysis. However, detailed project-level review would occur prior to this first phase of the DNA project.

For MOS-1, the alignment would begin at 7th and H Streets running north on 7th Street to F Street. This alignment is the same as the emergency courthouse by-pass described above, and would remain in service with full implementation of the DNA project for periods when use of the by-pass is requested by the U.S. District Court. North of F Street, the alignment would continue on 7th Street to just north of the Union Pacific overcrossing. At this point, the alignment would follow North 7th Street. The construction of a Railyards station under MOS-1 would be deferred to correspond with development of the Railyards project. At Richards Boulevard, the alignment would turn west on an exclusive right-of-way on the north side of Richards Boulevard, ending at a station on Richards Boulevard and North 7th Street. The MOS-1 alignment is shown on Figure 2-3.

For MOS-1, parking may be provided near the Richards Boulevard station west of the intersection of North B and North 7th Streets. The parking lot would be a temporary end-of-line facility and would be removed once the next phase of the DNA project is constructed. The end-of-line station on Richards Boulevard would be double tracked, facilitating end-of-line operations such as overnight train storage. Traction power substations would be constructed as described above for the full project. No new maintenance facility would be built under MOS-1. Vehicle maintenance would occur at existing RT facilities.

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Figure 2-3
MOS-1 Project Area

Full buildout of the DNA project in the MOS-1 project area would require additional construction, including the loop and station at the future Intermodal Facility and development of a full double-tracked guideway requiring a new crossing of the Union Pacific tracks on a dedicated alignment. The timing of these improvements is not known at this time. Development of the Railyards station also would be required at this time, unless that station can be expedited as part of the Railyards Redevelopment Project.

2.3.7 Capital and O&M Cost Summary

The assumptions and results of each set of cost estimates are presented below.

Capital Costs

Capital cost estimates were developed for the project (Table 2-1) Capital costs include all construction costs (such as construction of the transit guideway, maintenance facilities, Park-and-Ride lots, stations and associated facilities, and utility relocations); costs for new transit vehicles and initial spare parts; acquisition of right-of-way; and allowances for final engineering design, construction management, construction change orders, and an allocation for costs to RT for managing construction.

Table 2-1
Capital Costs for DNA Project
(Millions of 2006$)

Scenario	Construction Costs	Vehicles	Right-of-Way	Final Engineering, Construction Management, Project Reserve	Total Costs
DNA Project	392.9	106.9	68.2	217.3	785.3
MOS-1	20.8	0	5.8	10.8	37.4

O&M Costs

Annual O&M costs were estimated for the overall DNA project (Table 2-2), as well as for MOS-1. O&M costs include all expenditures required to provide daily transit service, including pro-rata RT system administrative costs, wages and benefits for transit vehicle operators and maintenance workers, security costs, and maintenance expenditures for the transit guideway, stations, facilities, and vehicles.

Table 2-2
Systemwide Annual O&M Cost Estimates
(Millions of 2006$)

Scenario	Annual Light Rail O&M Cost	Annual Bus O&M Cost	Total O&M Cost	Increase over Baseline Conditions
Baseline	60.3	119.0	179.3	N/A
DNA Project	74.9	120.8	195.7	16.7

O&M costs were calculated using a systemwide approach because the impacts from new service often extend beyond the route or corridor served. The DNA project relies on modifications to existing trunk routes and the establishment of new bus services that extend outside the Corridor. This interconnection with the future RT route network requires that O&M costs be examined systemwide.

Costs specific to the Corridor were calculated as the incremental change between Baseline costs (systemwide O&M costs without the DNA project) and with the DNA project. The estimated annual O&M cost for MOS-1, which includes light rail service to the Richards Boulevard Station, is approximately $0.9 million more than for the Baseline (2006). The annual O&M cost associated with the DNA project, which includes MOS-1 and future phases, is estimated to be $16.7 million more than the Baseline.

2.4 TRANSPORTATION IMPACTS

This section summarizes the transportation impacts related to implementation of the DNA project analyzed in this Draft PEIR including transit impacts; highway, local roadway, and intersection impacts; and parking impacts.

2.4.1 Transit Impacts

One measure that evaluates the extent to which a project would improve transit service is the comparison of transit travel times to the existing conditions. Table 2-3 shows the AM peak transit travel times for existing conditions (2005), future no-project conditions (2027), and the DNA project (2027).

Table 2-3
AM Peak Transit Travel Times
(Transit/Walk Access in Minutes)

	Existing Conditions (2005)	Future No-Project (2027)	DNA Project (2027)
Downtown to the North Natomas Town Center	54	64	35
Gateway Park/Natomas Crossing Area to Downtown Sacramento	41	51	34
South Natomas Near Truxel to Downtown Sacramento	34	42	29
Downtown Sacramento to the Airport	41	43	43

Transit Ridership/Patronage Impacts

As shown in Table 2-4, the DNA project is expected to lead to an increase in transit ridership within the corridor and within the region as a whole. This is a direct result of faster transit speeds that will make transit a more attractive travel option. Some trips that would be made by automobile under the no-project conditions are expected to be made on transit if the DNA project is constructed. The transit mode share (i.e., the percentage of trips made on transit) will increase, particularly for work trips from north of the American River to

Table 2-4
Average Weekday Systemwide Linked Transit Trips in the DNA Corridor

	Existing Conditions (2005)	Future No-Project (2027)	DNA Project (2027)
Daily Ridership in DNA Corridor (Linked Trips*)	4,100	8,470	15,910
Total Regional Daily Ridership (Linked Trips*)	102,080	164,870	179,040

*A "linked transit trip" means a trip that is taken from an origin to a destination using some mode of transit. Trips that involve a transfer from one transit vehicle to another, such as a transfer from bus to light rail, are counted as a single linked trip.

downtown Sacramento. In 2005, the DNA Corridor experienced 4,100 linked transit trips on an average weekday. This is anticipated to increase in 2027 to 8,470 linked transit trips under future no-project conditions, and to 15,910 linked transit trips with implementation of the DNA project.

2.4.2 Street and Highway Impacts

This section reviews the impacts to the DNA Corridor freeway, arterials, and intersections for the future no-project conditions and the DNA project.

Future No-Project

The *2006 MTP* includes significant roadway improvements in the DNA Corridor. This results in somewhat less congestion than would be anticipated by the increases expected in demand. According to the MTP, traffic volumes along segments of I-5 between the Airport and Downtown are expected to increase by 18 to 39 percent by 2027. The highest level of traffic growth on I-5 is projected to occur between the Richards Boulevard interchange and Garden Highway interchange, where 42 percent growth is anticipated.

Average daily traffic volume increases by 2027 on other roadways in the study area vary greatly. Under future no-project conditions, daily volumes on several important study area roadways increase by more than one hundred percent, including:

- Truxel Road: north of Gateway to Club Center, volumes increase from 124 to 226 percent;
- Arena Boulevard & North Market Boulevard: from Commerce Parkway to Gateway, volumes increase by 206 percent; and
- San Juan Road: from El Centro to Northgate, volumes increase from 34 to 147 percent.

DNA Project

The DNA project would have minimal effect on congestion in the DNA study area. Light rail service would slightly reduce traffic volumes on some roadways and marginally increase volumes on others compared to future no-project conditions in 2027. Traffic volumes would change between the future no-project condition and the DNA project for two reasons. First,

the construction of the DNA project would attract some additional transit riders and thereby reduce traffic volumes on some roadways. Second, some people would shift their travel routes and drive to Park-and-Ride lots at one of the new light rail stations. The traffic coming to and from these new stations would result in traffic increases on some roadways, or in some additional turn movements at some intersections.

2.4.3 Intersection Impacts

In addition to intersection impacts related to increased volumes at or near Park-and-Ride lots, some intersection impacts are related to increases in delay due to new at-grade rail crossings. The traffic analysis for the DNA project includes an estimate of the increase in delay at intersections related to a loss of the green time for autos at traffic signals when the tracks need to be cleared prior to a train arrival.

Future No-Project

Future no-project conditions impact four intersections in the Downtown area (5th and H Streets, 6th and H Streets, 7th and H Streets, and 7th and I Streets), plus the intersections of Truxel and Garden Highway, Truxel and San Juan Road, Northgate and Del Paso, and the I-5 northbound ramps at Garden Highway north of the American River.

DNA Project

Impacts to intersections resulting from the implementation of the DNA project include the following:

- **Truxel Road and Garden Highway.** Under future no-project conditions (2027), this intersection would operate at LOS "E" conditions in the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "F" conditions in the PM peak hour.

- **Truxel Road and San Juan Road.** Under future no-project conditions (2027), this intersection would operate at LOS "E" during the AM and PM peak hour. Traffic operations would degrade to LOS "F" conditions during both the AM and PM peak hours with the implementation of the DNA project.

- **Truxel Road and Gateway Park Boulevard.** Under future no-project conditions (2027), this intersection would operate at LOS "C" conditions in the AM peak hour and LOS "D" in the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" conditions in the AM and PM peak hour.

- **Truxel Road and Natomas Crossing.** Under future no-project conditions (2027), this intersection would operate at LOS "C" conditions in the AM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "D" conditions in the AM peak hour.

- **Truxel Road and Del Paso Road.** Under future no-project conditions (2027), this intersection would operate at LOS "C" conditions in the AM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "D" conditions in the AM peak hour.

- **5th Street and H Street.** Under future no-project conditions (2027), this intersection would operate at LOS "D" conditions in the AM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" conditions in the AM peak hour.

- **7th Street and Gateway Road.** Under the future no-project conditions (2027), this intersection would operate at LOS "C" conditions in the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "D" conditions in the PM peak hour.

2.4.4 Parking Impacts

In general, a growing demand for parking and a need to increase parking supply are anticipated at major activity centers in the DNA Corridor, particularly in Downtown Sacramento. The expected 22 percent increase in employment in Downtown Sacramento (from 2005 to 2027) would produce a proportional increase in parking demand in the absence of measures to decrease automobile travel to Downtown. There are currently no Park-and-Ride lots for RT transit services in the DNA Corridor.

As shown in Table 2-5, the future no-project conditions would not add Park-and-Ride spaces for transit services or displace any parking in the DNA Corridor. Transit improvements under the DNA project include Park-and-Ride lots with adequate spaces to match aggregate demand, also reducing parking demand in Downtown Sacramento. Therefore, a beneficial overall impact on parking supply is expected for the DNA project compared to future no-project conditions.

Table 2-5
2027 Parking Demand and
Parking Demand Decrease in the Central Business District

	Parking Demand in DNA Corridor	Decrease in Central Business District Parking Demand (Relative to Future No-Project)
Future No-Project	No transit improvements requiring Park-and-Ride facilities	--
DNA Project	2,260	1,186

2.5 ENVIRONMENTAL CONSEQUENCES

Table 2-6, located at the end this section summarizes the environmental consequences associated with the implementation of the DNA project. The environmental resource areas evaluated for the DNA project include:

- Land Use
- Farmlands
- Community Impacts
- Socioeconomic Impacts
- Property Acquisition and Displacement
- Environmental Justice
- Cultural Resources

- Parklands
- Public Safety and Security
- Visual and Aesthetic Resources
- Air Quality
- Noise and Vibration
- Biological Resources
- Hazardous Materials
- Utilities
- Energy Resources and Greenhouse Gas Emissions
- Water Resources
- Wetland Resources
- Summary of Construction Impacts
- Regulatory and Institutional Requirements
- Cumulative and Growth-Inducing Impacts
- Irreversible Environmental Changes

2.6 AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

The state CEQA Guidelines Section 15123(b) requires that areas of controversy known to the lead agency and issues to be resolved be included in an EIR. These issues are addressed in the following sections.

2.6.1 Areas of Controversy

A compilation of key public and agency involvement elements to obtain input in the decision process is provided in Chapter 6 of this Draft PEIR. As a result of the public scoping meetings, a number of public and agency comments identified support for, and interest in, the timely implementation of providing fast and frequent transit service from Downtown Sacramento to the Natomas and Airport areas. Other comments did not support the project and concerns expressed with respect to environmental issues typically focused on potential noise, safety, and traffic impacts, as well as on the effects of a new bridge crossing of the American River at Discovery Park.

The major areas of controversy related to the DNA project (and the section of the PEIR in which they are addressed) are:

- Property takings along the alignment (Section 4.6);
- Construction impacts – disruption of neighborhoods and businesses and traffic patterns during the construction phase (Section 4.20);
- Traffic impacts throughout alignment – impacts especially on Truxel Road and throughout South Natomas, and at station locations (Chapter 3);
- Parking spillover into communities at station locations (Chapter 3);
- Noise and vibration impacts along the rail guideway (Section 4.13);
- Visual impacts from elevated portions of the rail guideway (Section 4.11);

- Community impacts – the perceived impact of public transportation on residential neighborhoods, crime, and property values (Section 4.4);

- Biological, recreational, aesthetic, and noise impacts associated with crossing the American River (Sections 4.14, 4.9, 4.11, and 4.13, respectively); and

- Cultural resource impacts (Section 4.8).

2.6.2 Issues to be Resolved

There are a number of issues that will need to be resolved as planning and design proceed. These include the following:

- Selection of a final alignment in terms of placing the guideway in mixed-flow traffic or on a separate guideway, and in the median or along the sides of existing streets;

- All architectural details, including design of the new American River crossing;

- Integration of the project with planned developments such as the new Intermodal Terminal, Railyards, and Richards Boulevard redevelopment projects (e.g., Township 9);

- Specific operation patterns (e.g. headways);

- Specific configuration of the alignment and station location at the Airport (new Terminal B);

- Accommodation of crowds before and after events at ARCO Arena;

- Construction coordination with other transit and development projects; and

- Overall financing of future phases of the DNA project.

2.7 ALTERNATIVES CONSIDERED

The DNA Corridor Alternatives Analysis (AA) began in October 2001 with a comprehensive evaluation of transit alternatives in the study corridor. Results of this 2-year effort were documented in the *Downtown/Natomas/Airport Final Alternatives Analysis Report* (2004), which underwent continual review by RT staff, a Citizen Review Panel (CRP), a Technical Review Panel (TRP), the general public, and the RT Board of Directors. Based on consideration of all technical and public input provided, the RT Board of Directors approved the selection of the DNA project for further evaluation in the Draft PEIR on December 15, 2003.

Chapter 5, Alternatives, includes the alternatives chosen to be studied in the Draft PEIR for the DNA Corridor: the No-Project, TSM, I-5 Alignment, Hybrid Alignment, and Bus Rapid Transit Alternatives, as well as the I-5 and Urrutia River Crossing Alternatives.

- **No-Project Alternative.** The no-project condition consists of the existing transportation system and all of the transportation projects that are planned for in the 2006 MTP with the exception of the LRT project programmed for the DNA Corridor. Significant improvements to both the highway and transit network are included in the 2006 MTP.

- **TSM Alternative.** The TSM Alternative was developed as part of the AA process to satisfy an FTA requirement to obtain funding under FTA's New Starts program. The TSM Alternative was developed as a modified version of the fiscally constrained 2006 MTP adopted by SACOG. The TSM Alternative includes a set of lower-cost bus transit improvements serving the DNA Corridor. It also includes all other transit and highway improvements in the region that were identified in the 2006 MTP. Finally, the TSM Alternative utilizes the transit network that was created for the No-Project Alternative, with increased frequencies on some routes.

- **I-5 Alignment.** The I-5 Alternative would provide light rail service from Downtown Sacramento, along an 11.6-mile corridor through South and North Natomas along I-5 to the Airport. The alignment would be constructed parallel to I-5 in a separate right-of-way adjacent to the Caltrans right-of-way, avoiding the central areas where residential and commercial development occurs in the Corridor. Ten stations accessible to patrons with mobility impairments would be constructed as part of the I-5 Alternative. A total of 1,500 park-and-ride spaces would be provided at three stations. Seven feeder bus routes and shuttles would connect homes and businesses with light rail stations. A full LRV maintenance facility would be built near or at the northern end of the DNA line. Although it was dropped from further consideration in the 1991 Route Refinement Study, public interest in keeping a transit improvement adjacent to an existing transportation corridor convinced RT to retain this alternative.

- **Hybrid Alignment.** The Hybrid Alignment Alternative would extend light rail service from Downtown Sacramento along a 13.6-mile corridor through South and North Natomas to the Airport. This alignment avoids penetrating South Natomas by following I-5 from Downtown Sacramento to I-80; then continues east parallel to I-80; and finally north, following Truxel Road in North Natomas. Thirteen stations would be constructed as part of the Hybrid Alignment Alternative. Six of the 13 stations would provide a total of 1,880 parking spaces. Seven feeder bus routes and shuttles would connect homes and businesses with light rail stations. A full vehicle maintenance facility would be built at or near the northern end of the DNA line. This alternative was developed in direct response to comments from residents living along Truxel Road in South Natomas that requested RT to examine an alternative alignment that avoided any direct impacts to their neighborhood.

- **Bus Rapid Transit.** The Bus Rapid Transit (BRT) Alternative would develop frequent, medium-capacity BRT service from Downtown Sacramento, along a 12.41 route-mile corridor through South and North Natomas to the Airport. The BRT Alternative would use a guided busway with raised curbs to guide buses through most of the Corridor. Exceptions to the guided busway concept include the BRT alignment along Richards Boulevard, which is in curbside bus lanes, and west of SR 99, which is in a conventional busway. The BRT Alternative would include a total of 13 stations. Seven of the 13 stations would provide a total of 1,840 park-and-ride spaces. The BRT Alternative would include 13 bus routes. Six BRT routes would provide direct connections between residences and businesses and Downtown Sacramento using the BRT alignment. Modifications to the BRT Alternative considered fewer structures and grade separations to provide a lower-cost alternative and shorter alignment, extending from Downtown Sacramento to the Natomas Town Center. The BRT Alternative developed as a result of public interest in studying the BRT mode.

- **I-5 River Crossing.** The I-5 River Crossing design option parallels the existing I-5 bridge from Richards Boulevard to the north side of Garden Highway. This is the only crossing design option proposed to be an elevated crossing over Garden Highway, landing at grade on the north side heading east to the Garden Highway and Truxel Road intersection. The location of the I-5 River Crossing would have a direct effect on approximately 500 linear feet of the Nature Study area, removing many mature trees, and 1,500 feet of Discovery Park, which is an active recreational park. Although the bridge would parallel the existing I-5 bridge (thus consolidating bridges), it would be located approximately 100 feet from the existing I-5 bridge to accommodate the HOV lanes planned on I-5 in the 2006 MTP.

- **Urrutia River Crossing.** Under the Urrutia River Crossing design option, the alignment would continue north on North 7th Street. This crossing would require the removal of the Richards Boulevard station and the construction of a new station on North 7th Street. Once across the American River, the alignment would continue over the Urrutia private quarry and residence property, and cross to the north side of Garden Highway at grade. Approximately 60 percent of the Urrutia River Crossing would cross disturbed, abandoned, gravel-mined property. At this point, the alignment turns west to reach Truxel Road, the turning radius of which would require the acquisition of two residences and a utility substation. The approximate 2,000 feet of alignment along Garden Highway is bordered by single-family homes, condominiums, and apartments to the north, at the base of the Garden Highway levee.

2.8 COORDINATION AND CONSULTATION

From the onset, RT has taken a proactive and comprehensive approach in engaging both the local community and the region in the development process of the DNA Study. The public process has influenced the selection of the DNA project during each step of the alternatives screening process.

To coordinate with necessary state and local regulatory agency stakeholders, RT identified two key coordination approaches. The first approach included the identification of nearly 60 key community and businesses organizations that formed the basis of two stakeholder advisory groups. The first group, the Technical Review Panel (TRP), comprised nearly 40 representatives, and the Citizen Review Panel (CRP) comprised nearly 50 members. To date, the TRP has met 19 times and the CRP has met 18 times. Additionally, RT held over 110 public meetings with stakeholder groups and resource agencies to address key issues and coordination efforts related to the project.

As a result of the public involvement effort the following project issues surfaced and were incorporated into the configuration of the DNA project:

- The Alkali and Mansion Flats Historic Neighborhood Associations raised concerns about the project related to cultural, noise and vibration, traffic circulation and pedestrian access. The impacts assessment indicated that there would not be any impacts associated with their issues, which was communicated to the communities. Insofar as pedestrian access is concerned, working closely with the community during preliminary engineering will ensure that the DNA project does not impede pedestrian access.

- The Natomas Community Association, River Oaks Community Association, Discovery Village Homeowners Association, Truxel Road Preservation Association and the River

City Commons Homeowners Association raised concerns about the project and its potential impact on residents and businesses located along Truxel Road, between Garden Highway and San Juan Road. Specific issues included concerns about property values, local resident safety, traffic circulation, noise and vibration, aesthetics, property acquisition and local land use. To address the issue of property acquisition, a design option was developed that eliminated all of the residential relocations (81) for the DNA project. To address impacts on property values and safety, research was conducted and the information was provided to the concerned groups.

- Similar to the residents in South Natomas, the North Natomas Alliance and Natomas Crossing Community Association also raised concerns about the project and its potential impact on people living and working along Truxel Road and north of I-80.

2.9 IMPLEMENTATION STRATEGY

The complexity and financial investment involved in building the DNA project will require RT to strategically phase the construction of the DNA project, hence the development of MOS-1. Significant development proposals in the Railyards and Richards Boulevard area are poised to begin construction, all of which anticipate light rail stations adjacent to their developments. Ideally, these projects along with the DNA line should be implemented in the same timeframe. In addition, a statewide ballot measure was approved by voters in November 2006 that will provide RT with additional funds for continuing DNA project development, but not construction.

2.9.1 Opportunities in the Making

Due to continued and rapid population growth, coupled with expectations for a strong, real estate market in the Sacramento Region, the City of Sacramento has been presented with several major proposed development projects within the Corridor. Listed below, each of these projects could have a very positive influence on future DNA ridership and construction funding.

Short-Term (through 2007)

- The City of Sacramento recently acquired 15 acres of property and an existing office building along Richards Boulevard in close proximity to the proposed (and optional) Sequoia Pacific Station. The City will use the site for City offices and a new police station to serve the Richards Area. RT may potentially obtain some station parking on the City site.

- In November 2006, state voters passed Proposition 1A and 1B. Passage of this measure could result in RT receiving a significant increase in State Transit Assistance funds as well as other capital funding. Together, these funds could be used for system expansion, such as building a portion of the DNA project, the replacement of buses and to help cover RT's annual operating and maintenance costs.

- On December 11, 2007, the Sacramento City Council approved the *Railyards Redevelopment Plan*, based on a proposal submitted to the City in 2006 by Thomas Enterprises. This project will help transform the area into a vibrant new hub of much-needed downtown housing and economic activity that would be directly served by

light rail. Discussions continue between RT and City staff about how redevelopment could help fund a portion of the DNA extension through this area.

- In August 2007, the Sacramento City Council approved the Township 9 development proposal, located along Richards Boulevard.

- The City of Sacramento has approved the construction of an 810,000-square-foot office complex on the northeast corner of Richards Boulevard and North 7th Street, an easy two-to-three minute walking distance from the proposed Richards Boulevard Station. A six to eight level parking structure would be built that could also provide some RT station parking.

- Several hundred yards further north on North 7th Street, discussions are also occurring between the owner of Continental Plaza, an existing vacant office campus, and the State of California regarding a new judicial complex to be built on this site. This proposal will include additional parking for employees that could be made available to RT for Park-and-Ride spaces.

- In the summer of 2005, the City of Sacramento circulated a Notice of Preparation of a Draft Environmental Impact Report for the proposed Greenbriar Project. The Sacramento Local Agency Formation Commission approved Greenbriar for annexation into the City of Sacramento in April 2008. Should this project proceed and be built, it will provide RT with potential system users, dedicated property for the alignment and $2.2 million in developer funds to build a new rail station and Park-and-Ride lot.

Mid-Term (2008 and Beyond)

- The Airport is experiencing sustained rapid growth and is anticipated to handle between 15 and 16 million passengers annually by 2020, a 60 percent increase over current numbers. There is significant potential to capture many on transit with a direct connection to the new Airport terminal.

- As a separate project within the Railyards area, the City of Sacramento intends to build a new Sacramento Intermodal Transportation Facility to provide efficient transit connections. Planning for this new facility is occurring simultaneously with the City of Sacramento's review of the redevelopment plan proposed by Thomas Enterprises, and both include a light rail station.

2.9.2 Timing is Key

In a rapidly growing region such as Sacramento, community planning for the future is never static. As decisions are made in the region, RT will work with its planning partners and the local community to strategically implement rail service between Downtown, Natomas, and the Airport in the most efficient and cost-effective manner possible.

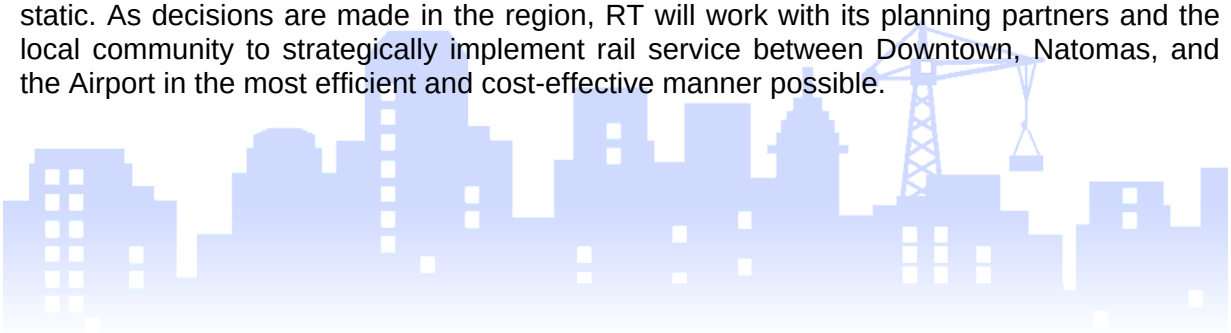


Table 2-6
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Transportation			
TRAN-1 Implementation of the DNA project south of the American River would increase total regional transit demand from the estimated levels under the 2014 future no-project condition.	Beneficial Impact	No mitigation is required.	Beneficial Impact
TRAN-2 Transit travel times for trips within the DNA Corridor and specifically to Downtown would improve under the DNA project compared to the future no-project conditions (2027) for most of the four trip interchanges analyzed.	Beneficial Impact	No mitigation is required.	Beneficial Impact
TRAN-3 Implementation of the DNA project north of the American River would increase total regional transit demand from the estimated levels under the future no-project conditions.	Beneficial Impact	No mitigation is required.	Beneficial Impact
TRAN-4 Richards Boulevard/I-5 southbound ramp intersection would operate at LOS "C" during the PM peak hour under future no-build conditions and would degrade to LOS "D" under the DNA project.	Potentially Significant Impact	**MTRAN-4**: The southbound approach to this intersection currently has two separate left turn lanes, a right turn lane, and a shared right turn lane. The impact could be mitigated by changing the shared right turn lane to a shared left turn lane for the southbound approach.	Less than Significant Impact
TRAN-5 Viewed on a regional basis, the DNA project would result in a decrease in total regionwide vehicle-miles of travel compared to future no-project conditions.	Beneficial Impact	No mitigation is required.	Beneficial Impact
TRAN-6 Under future no-project conditions, the intersection of Truxel Road and San Juan Road would operate at LOS "E" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "F" conditions during the AM peak hour.	Potentially Significant Impact	**MTRAN-6**: The addition of a second westbound right turn lane plus right turn overlap phasing on all approaches would mitigate the LOS impact at this intersection under the DNA project.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
TRAN-7 Under future no-project conditions, the intersection of Truxel Road and San Juan Road would operate at LOS "E" during the PM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "F" conditions during the PM peak hour.	Potentially Significant Impact	**MTRAN-7**: The addition of a second westbound right turn lane plus right turn overlap phasing on all approaches would mitigate the LOS impact at this intersection under the DNA project.	Less than Significant Impact
TRAN-8 Under future no-project conditions, the intersection of Garden Highway and Truxel Road would operate at LOS "E" conditions in the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "F" conditions in the PM peak hour.	Potentially Significant Impact	**MTRAN-8**: The *2006 MTP* includes widening of Garden Highway from two to four lanes. It is assumed that when the Garden Highway is widened, a second eastbound left turn lane will be added at the intersection with Truxel Road. The additional delay due to the DNA project would cause an impact that could be mitigated by adding a westbound right turn lane on Garden Highway.	Less than Significant Impact
TRAN-9 Under future no-project conditions, the intersection of Gateway Park Boulevard and Truxel Road would operate at LOS "C" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" or "E" conditions during the AM peak hour.	Potentially Significant Impact	**MTRAN-9**: Provide a "free" right turn lane for northbound traffic by widening Gateway Park Boulevard (along its southeast side, east of Truxel Road) so that northbound right turns can turn into their own lane and travel a couple hundred feet before this added "receiving" lane tapers and vehicles must merge with through traffic on Gateway Park Boulevard.	Less than Significant Impact
TRAN-10 Under future no-project conditions, the intersection of Gateway Park Boulevard and Truxel Road would operate at LOS "D" during the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" condition during the PM peak hour.	Potentially Significant Impact	**MTRAN-10**: Provide a "free" right turn lane for northbound traffic by widening Gateway Park Boulevard (along its southeast side, east of Truxel Road) so that northbound right turns can turn into their own lane and travel a couple hundred feet before this added "receiving" lane tapers and vehicles must merge with through traffic on Gateway Park Boulevard.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
TRAN-11 Under future no-project conditions, the intersection of Natomas Crossing and Truxel Road would operate at LOS "C" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the AM peak hour.	Potentially Significant Impact	**MTRAN-11**: A right turn overlap phasing on the southbound and eastbound approaches would mitigate the LOS impact at this intersection.	Less than Significant Impact
TRAN-12 Under future no-project conditions, the intersection of Del Paso Road and Truxel Road would operate at LOS "C" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the AM peak hour.	Potentially Significant Impact	**MTRAN-12**: The LOS impact could be mitigated by providing a "free" right turn lane for southbound traffic merging into Del Paso Road.	Less than Significant Impact
TRAN-13 Under future no-project conditions, the intersection of Gateway Park Boulevard and Del Paso Road would operate at LOS "D" during the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" conditions during the PM peak hour.	Potentially Significant Impact	**MTRAN-13**: A right turn overlap phasing on the northbound approach would mitigate the LOS impact at this intersection.	Less than Significant Impact
TRAN-14 Under future no-project conditions, the intersection of 5th Street and H Street would operate at LOS "D" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "E" conditions during the AM peak hour.	Potentially Significant Impact	**MTRAN-14**: The southbound approach to this intersection currently has a separate left turn lane. The LOS impact could be mitigated by changing the separate left turn lane to a shared left lane for the southbound approach.	Less than Significant Impact
TRAN-15 Under future no-project conditions, the intersection of North 7th Street and Gateway would operate at LOS "C" during the PM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the PM peak hour.	Potentially Significant Impact	**MTRAN-15**: The LOS impact of the DNA project could be mitigated by adding a westbound through lane on Gateway.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
TRAN-16 The placement of light rail tracks may impact access to local streets or driveways in some portions of the DNA Corridor by eliminating median left-turn access at some local intersections and driveways along Truxel Road in South Natomas.	Potentially Significant Impact	**MTRAN-16**: The mixed-flow design for Truxel Road in South Natomas would minimize these impacts but would still impact two or three local intersections, as well as driveways at 14 single-family residences.	Significant Impact
TRAN-17 There is the potential for transit passengers to park long-term on local streets in the vicinity of any station.	Potentially Significant Impact	**MTRAN-17**: RT will coordinate with the City and the community to develop a parking monitoring program in order to best resolve potential overflow parking due to RT facilities. The potentially significant impact of long-term parking by transit users either on-street or at commercial sites could be mitigated by monitoring parking near transit stops and if substantial parking impacts occur, work with City of Sacramento to implement a parking program. Such a program could involve parking enforcement, parking time limits and/or permit parking.	Less than Significant Impact
Land Use			
LU-1 The DNA project is reflected in all planning documents and approved transportation maps concerning the project area south of the American River. Implementation of the DNA project would support the objectives of the Railyards and Richards Boulevard redevelopment plans.	Beneficial Impact	No mitigation is required.	Beneficial Impact
LU-2 The Park-and-Ride lot in the Richards Boulevard redevelopment area would be used until the project is extended into Natomas and there is no longer a need for a Park-and-Ride in this area. This temporary parking use would be inconsistent with the *Richards Boulevard Redevelopment Plan* to encourage a low parking ratio in full build-out.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
LU-3 The DNA project could be inconsistent with the current agricultural land use designation of Greenbriar.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Farmlands			
FARM-1 The DNA project would require a 40-foot-wide, 1-mile-long section of right-of-way on the Greenbriar property. This area is almost entirely Prime Farmland; however, it is currently being considered for a large residential development. The DNA project would require a total of 7.40-acres, which includes areas for the trackway, a station, a small Park-and-Ride, and access.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Community Impacts			
COM-1 Overflow parking at the Park-and-Ride lot could cause an increased demand on already limited on-street parking in the area. The potential for illegal parking could occur if demand greatly exceeds supply.	Potentially Significant Impact	**MCOM-1**: A parking management program will address overflow and potential illegal parking issues at stations with and without Park-and-Rides. The management program will include measures such as assisting residents with their requests for obtaining residential parking permits and metered parking from the City of Sacramento to discourage Park-and-Ride users from day-long on-street parking. In addition, RT will establish a community outreach plan that will involve charrettes to gather input on the design of stations and Park-and-Rides.	Less than Significant Impact
COM-2 Construction activities would last up to three years with substantial work to the roads in the Richards neighborhood and the Alkali Flat neighborhood. This would temporarily cause a direct access disturbance to the Richards neighborhood and an indirect access disturbance to the Alkali Flat neighborhood.	Potentially Significant Impact	**MCOM-2**: Access management plans will be prepared to address access concerns during construction for neighborhood and business access, and bicyclist and pedestrian circulation. Alternative routes will be identified to maintain safe and continued access. All plans must be reviewed by affected entities such as the City, County, and Caltrans when constructing within their right-of-way. The plan will include at a minimum the following components: signage for advance notice of construction activities and detour routes, communications list, communication methods and frequency, and coordination with business and residential task forces within the Corridor.	Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
COM-3 The station at San Juan Road is expected to be located on the Natomas High School grounds or the median of Truxel Road. Either location will require property from the High School. The baseball fields at the school could be relocated by the station.	Potentially Significant Impact	**MCOM-3**: The station at San Juan Road is expected to be located on the Natomas High School grounds or the median of Truxel Road. Either position will require property from the High School. During preliminary engineering, further design refinement will investigate how to avoid the High School baseball fields. If the impact can not be avoided, the baseball fields affected by the project would be relocated to replace the existing facility.	Less than Significant Impact
Socioeconomic and Fiscal Impacts			
SOC-1 The DNA project could result in the loss from the public tax rolls of up to $138,698 per year.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
SOC-3 Implementation of the DNA project could require up to 20 business relocations. These businesses are estimated to represent up to as many as 165 relocated jobs.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
SOC-3 Construction of the DNA project would have direct effects on local businesses. With implementation of the project, RT would be required to provide access to local businesses during construction. However, the presence of construction activities would temporarily inconvenience shoppers and affect businesses along the alignments.	Potentially Significant Impact	**MSOC-3**: Mitigation for business access issues will include the following: • Develop an Access Management Plan during construction • Provide signage to direct business patrons during construction • Conduct night construction to accelerate construction in critical areas • Provide temporary access during normal business hours	Less than Significant Impact
Property Acquisition and Displacement			
PROP-1 Partial property acquisitions would be required for additional right-of-way in the Richards Boulevard area.	Less than Significant Impact	No mitigation is required beyond those listed below for full acquisitions.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
PROP-2 Full property acquisitions would be required for the additional right of way associated with the bridge crossing and the Park-and-Ride lot at West El Camino Avenue and Truxel Road. Implementation of the DNA project north of the American River could require up to 23 business relocations and up to 3 residential relocations.	Potentially Significant Impact	**MPROP-2:** In addition to compliance with federal (Uniform Relocation Act), state, and RT policies, RT will adhere to the following mitigation measures: • RT shall minimize the time between right-of-way acquisition and project construction. If right-of-way acquisition precedes project construction by more than two years, RT shall prepare and implement a vegetation management plan that prescribes a mowing schedule that minimizes fire risk and nuisance use of the property and allows for interim use of the property (e.g., for parking or community gardens) subject to specific approval by the RT Board of Directors. • RT will provide relocation assistance counseling, advertising to assist with redirecting business clientele, and assistance in redirecting employment opportunities.	Less than Significant Impact
PROP-3 Construction of a maintenance facility within the industrial zone at Metro Air Park is being considered and would require acquisition of 15.5-acres of private property.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Environmental Justice			
EJ-1 **A**ll 20 business relocations required for the DNA project north of the American River serve neighborhoods that are greater than 50 percent minority. Because 100 percent of the business relocations are within, or service, a minority community, this is considered a disproportionate direct impact.	Potentially Significant Impact	For a discussion of mitigation measures applicable to property acquisition and relocation refer to Section 4.6, Property Acquisition and Relocation.	Less than Significant Impact
Cultural Resources			
CUL-1 Indirect effects on the Sacramento Valley Station	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
CUL-2 Indirect effects on the Southern Pacific Railyards Historic District	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
CUL-3 Indirect effects on the Alkali Flat (West)	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
CUL-4 Change in setting for historic Alkali Flat properties on 7th Street	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
CUL-5 Construction of the Richards Boulevard station may require the removal of a portion of the Bercut-Richards Cannery, which is listed in the Sacramento Register of Historic Places.	Potentially Significant Impact	**MCUL-5**: Mitigation would be required for the removal of a portion of the Bercut-Richards Cannery. Mitigation shall include Historic American Buildings Survey (HABS) Level II documentation on the Cannery complex, the loft building, the original machinery used to circulate cans, as well as the other auxiliary buildings associated with the canning operation. The completed HABS documentation will be housed at Sacramento Development Services Department, Sacramento Public Library and the California State Library. Mitigation measures for demolition of the Cannery shall be coordinated with the local preservation office and the SHPO. These measures shall be carried out in accordance with a Programmatic Agreement to be adopted by all parties.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
CUL-6 Construction of the DNA project would require disturbance of soils. Because unknown Native American and historical cultural resources may be present within subsurface soils, construction activities could cause the disturbance of these resources.	Potentially Significant Impact	**MCUL-6**: RT shall require the construction contractor to adhere to the following requirement by placing this text in the project's construction specifications: "If archeological or cultural resources are discovered during the work, the contractor shall cease all construction operations in the vicinity of the discovery until a qualified archeologist can assess the value of these resources and make recommendations to the State Historic Preservation Officer." Archeological and cultural resources include artifacts; large amounts of bone, shell, or flaked stone; and other evidence of human activity. If the State Historic Preservation Officer directs that work be temporarily ceased at the location of an archeological or cultural find, the contractor shall temporarily suspend work at the location. All remedial actions recommended by the archeologist following a discovery will be followed.	Less than Significant Impact
CUL-7 Construction of the Truxel Road river crossing has the potential to impact prehistoric site CA-SAC-26; the project right-of-way would pass near the site boundary.	Potentially Significant Impact	**MCUL-7:** RT shall implement the following mitigation measures: • Monitoring by a qualified archaeologist during construction activity affecting previously undisturbed soils. • Coordination with the Native American community for construction monitoring in sensitive areas. • Installation of proper fencing, signage, and site security to prevent adverse effects or vandalism to sensitive areas.	Less than Significant Impact
CUL-8 The DNA study area lies in part within the boundaries of the RD 1000 RHLD and would cross several identified RHLD features (e.g., San Juan Road, East Drainage Canal).	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Parklands			
PARK-1 Construction of the river crossing for the DNA project would bisect the American River Parkway and directly affect Discovery Park. Construction of the American River Crossing would affect approximately 10-acres of park property. It is assumed that the contractor would access the site from the Garden Highway and through Discovery Park. Park users would be temporarily affected by construction activities, including the movement of heavy equipment on park roads, restricted access, and temporary closure of some park properties, noise, dust, and other inconveniences. The construction activities also would degrade the visual character of the park and disrupt passive activities such as bird watching, hiking, jogging, and use of the archery range. Joggers, walkers, and bicyclists would need to be rerouted safely around the construction site.	Potentially Significant Impact	**MPARK-1**: Mitigation of construction impacts on the American River Parkway and Discovery Park shall include: Design Phase Sponsor public design workshops with affected stakeholders and interested members of the public during preliminary engineering (PE) to encourage context-sensitive bridge and transit station area design that is consistent with Policy 5.7 of the 1985 American River Parkway Plan: Policy 5.7 Structures that are in the Parkway or visible from the Parkway shall be of design, color, texture and scale that minimizes adverse visual intrusion into the Parkway. 5.7.1 Structures shall be constructed of naturalistic materials which blend with the natural environment. 5.7.2 Colors shall be earth tones, or shall blend with the colors of surrounding vegetation. 5.7.3 Structures may emulate authentic historic design, but shall be unobtrusive. 5.7.4 To the extent possible, structures shall be screened from view by native landscaping or other naturally occurring features. 5.7.5 Structures shall not include any commercial advertising. 5.7.6 Structures shall be located so that neither they, nor activities associated with them, cause damage to native plants or wildlife. 5.7.7 Structures shall be located so that neither they, nor activities associated with them, disrupt the recreational use of the Parkway, and such structures shall be consistent with the	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
PARK-1 (cont'd)		goals and policies of this plan. 5.7.8 Structures shall be of fire resistant construction and designed and located in a manner such that adequate emergency services and facilities can be provided. • Define the alignment during PE with the goal of minimizing impacts on sensitive areas and limiting allowable construction easements. • Coordinate with resource agencies to identify and provide protection of important habitats. • Develop a Master Planting Plan to minimize the visual impacts of the alternative. • Consult with law enforcement staff during the design stage to help ensure that the bridge does not become an attractive nuisance for illegal activities. Temporary/Construction Phase • In coordination with Sacramento County Regional Parks personnel, prepare a plan defining public safety measures to be implemented during project construction activities within Discovery Park. The plan should include, at a minimum, the following provisions or should provide measures that would accomplish the objectives of the following provisions: – Secure project construction sites e.g., installing security fencing surrounding the staging area, jacking pit areas and open trenches) to prohibit public access at the end of each workday – Provide security personnel to prohibit public access to the construction areas within the park when the park is open to the public – Provide security lighting at staging areas, open trenches, and other excavations during non-daylight hours – Store all fuels, chemicals, solvents, or other fluids used during project construction within the secured construction areas	

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
PARK-1 (cont'd)		– Contain and properly dispose of any spilled materials; prohibit public access to areas contaminated by spilled materials that may pose a potential health hazard. – Post warning signs in suitable locations within the park, at the staging area, and at the jacking pit areas to alert park users – Install public information sign(s) at suitable locations describing the project and its purpose, upcoming project construction activities, and the expected duration of construction activities – Distribute a public information sheet that describes the project and construction activities to all park users as they enter the park from Garden Highway • In coordination with Sacramento County Regional Parks personnel, prepare a traffic and access management plan that includes the following provisions: – Provide at least one open lane for traffic passing through the construction sites or provide a posted detour route around the project construction site – Provide personnel to direct traffic along the park roadways that are used jointly by construction crews and the public, along open roadways adjacent to the jacking pit areas, and at the staging area – Implement traffic protocols and travel routes for all project construction trucks, vehicles, and equipment, including measures for ingress, egress, turning, and back-up movements – Limit construction-related travel through the park to a minimum number of designated park roadways – Maintain public access to Discovery Park from Garden Highway, consistent with current park policies – Post construction vehicle speed limit signs on roadways at suitable locations within the park – Maintain temporary access for bicycle and pedestrian trails throughout the duration of construction	

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
PARK-1 (cont'd)		• Post signs along the designated park roadways indicating their use as construction routes • Implement best management practices during construction to control erosion (refer to Section 4.18, Water Resources), protect cultural resources (refer to Section 4.8, Cultural Resources), minimize visual degradation (refer to Section 4.11, Visual and Aesthetic Resources), and assure prompt revegetation (refer to Section 4.14, Biological Resources)	
PARK-2 The operation of the DNA project would require that 1.8-acres of parkland be dedicated as permanent transit right-of-way.	Potentially Significant Impact	**MPARK-2**: The permanent parkland acquired for transit uses shall be replaced by recreation property of equal or greater value and usefulness.	Less than Significant Impact
PARK-3 The proposed station at the South Natomas Community Center may impact 0.05-acre of landscaping at the community center and 0.05-acre of landscaping from six residences along Truxel Road.	Potentially Significant Impact	**MPARK-3**: The 0.05 acres of parkland acquired for the proposed station shall be replaced by recreation property of equal or greater value and usefulness.	Less than Significant Impact
PARK-4 Construction effect (noise, dust, etc.) on the users of the future High School park site.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
PARK-5 Construction effect (noise, dust, etc) on the users of the North Natomas Regional Park site.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
PARK-6 Construction effect (noise, dust, etc) on the users of the 8A park site.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Public Safety and Security			
SS-1 Implementation of the DNA project south of the American River would require construction of four light rail stations. Passengers would congregate at station platforms and at any parking area provided near the end-of-line station at Richards Boulevard, providing an opportunity for crime	Less than Significant Impact	**MSS-1**: RT shall continue to evaluate transit police staffing needs and hire proportionate to the increase in transit service. RT will continue to include police and safety management personnel as participants in the design of the light rail stations. To increase public safety and security, RT will implement applicable guidelines from the American Public Transit Association *Rail Safety Audit Program Manual* (1990) and the federal *Public Transportation System Security and Emergency Preparedness Planning Guide* (2003).	Less than Significant Impact
SS-2 The addition of at-grade crossings increases the risk of accidents between light rail vehicles and automobiles. As configured, the DNA project includes 39 at-grade crossings, which represent an increased potential for accidents. A second potential accident risk is represented by mixed-flow operation where the LRT would operate in the same travel lane as automobiles for approximately 2 miles on Truxel Road.	Potentially Significant Impact	**MSS-2**: RT will implement traffic control measures, such as • Monitoring Traffic signal coordination • Improved sight distances • "No left turn" warning devices • Advance warning signs • Four-quadrant gate system • Adequate gate arm length	Significant Impact
SS-3 The DNA project would pass near or at Natomas High School and Inderkum High School. The design, per CPUC regulations, will include protective fencing and security personnel that would prevent children from accessing station locations near schools in an unsafe manner, or from entering maintenance facilities and construction sites. The project would not disproportionately expose children to health and safety risks	Potentially Significant Impact	**MSS-3**: RT shall implement the following: • RT will involve the Natomas Unified School District with respect to station design and pedestrian crossings anyplace that children will have to cross the rail line to get to school. • RT will participate with the Natomas Unified School District to provide school crossing guards as deemed necessary around at-grade crossings within school zones. • RT will work with the Natomas Unified School District to provide safety education for school children.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Visual and Aesthetic Resources			
VIS-1 Visual intrusion into historic areas	Potentially Significant Impact	**MVIS-1**: RT shall consult with the City of Sacramento's Historic Preservation Specialist so that light rail, which is included at the Sacramento Valley Station, reflects the historic integrity of the building and its uses.	Less than Significant Impact
VIS-2 Impacts to visual and aesthetic resources that would result from overhead catenary	Potentially Significant Impact	**MVIS-2**: Where possible, overhead catenary systems shall be designed to be compatible with the adjacent community appearance.	Significant Impact
VIS-3 Impacts to visual and aesthetic resources that would result from aerial flyovers and grade separations	Potentially Significant Impact	**MVIS-3**: Aerials located at the American River, I-80, and SR 99 shall match existing bridge profiles, employ graffiti-resistant surfaces, and incorporate plantings, where possible, to soften the structure.	Significant Impact
VIS-4 Impacts to visual and aesthetic resources that would result from street widening or sections of new right-of-way	Potentially Significant Impact	**MVIS-4**: Where the alignment results in residential or business property relocations and widening of the "street footprint," and when portions of the property acquisition allow, a tree-lined walkway shall be incorporated to provide additional visual enhancement for pedestrians accessing the station and nearby destinations. This treatment shall emphasize the replacement of any landscaping that was removed in order to soften urban structures and blend in with the local community. Design input may address the use of sound walls, tree and ground cover, and/or short shrub vegetation where appropriate.	Less than Significant Impact
VIS-5 Impacts to visual and aesthetic resources that would result from station locations and new Park-and-Ride lots	Potentially Significant Impact	**MVIS-5**: Stations and Park-and-Ride lots shall be designed to integrate into the landscape and be consistent with site-specific design guidelines. If the Park-and-Ride stations cannot be shared with other existing or planned facilities, then the parking lots shall adhere to local parking ordinances regarding shade, landscaping, lighting, and visibility. Lights at the stations and lots shall be directional and shielded to reduce offsite light scatter and glare.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
VIS-6 Impacts to visual and aesthetic resources that would result from maintenance and train storage facilities/substations	Potentially Significant Impact	**MVIS-6**: The maintenance and train storage facilities/substations shall be screened from view with architecturally appropriate fencing, depending on the adjacent land use. Lights shall be directional and shielded, and timers and sensors shall be used to minimize the time that lights are on in areas where lighting is not normally needed for safety, security, or operation. Landscaping, including fast-growing species, shall be planted for further screening. Architecture shall reflect a rural or suburban commercial style where appropriate.	Less than Significant Impact
VIS-7 Impacts to visual and aesthetic resources that would result from construction activities and staging areas	Potentially Significant Impact	**MVIS-7**: Construction material staging areas shall be fenced and screened. After project construction, the ground surfaces shall be restored to their original condition, and any vegetation that had been removed during the construction process shall be replaced with like-kind vegetation.	Less than Significant Impact
Air Quality			
AQ-1 Construction of the DNA project could be expected to result in air quality degradation due to fugitive dust and emissions from construction equipment.	Potentially Significant Impact	**MAQ-1**: The project shall provide a plan for approval by the lead agency and SMAQMD demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet average 20 percent NOX reduction and 45 percent particulate reduction compared to the most recent ARB fleet average at time of construction~~.~~; and the project representative shall submit to the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
AQ-1 (cont'd)		The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and [DERA, City of Sacramento, SMAQMD, etc] shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as site inspections to determine compliance. Nothing in this section shall supersede other SMAQMD or state rules or regulations. • The project shall ensure that active grading and parking areas are watered at least twice daily. • The project shall ensure that exposed stockpiles are enclosed, covered, watered twice daily. • The project shall ensure that all trucks hauling dirt, sand, silt, or other loose materials are covered or maintain at least two feet of freeboard. In addition to the SMAQMD recommendations, the following mitigation measures will also mitigate the short-term impacts from construction equipment exhaust: **Equipment** The project shall include the following as part of the construction	

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
AQ-1 (cont'd)		mitigation measures: • Level 3 Diesel Particulate Filters will be used on all off-road diesel equipment for which the ARB has verified specific control technology. A listing of ARB verified control technologies is available on the ARB website, http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm." • Establish idling limit (e.g., 5 minutes per hour). • The equipment will be tuned to manufacturers' specifications at the manufacturers' recommended frequency. • Any tampering with engines will be prohibited and continuing adherence to manufacturer's recommendations will be required. **Work Limitations** • No more than two pieces of equipment will be used simultaneously near or upwind from sensitive receptors. • Additional emissions limits will be established within 1,000 feet of any K-12 school, based on ARB proposals. • Notification will be provided to all schools within 1,000 feet of a construction site. Truck trips will be reduced and/or hours of driving will be restricted through residential communities. **Administrative** • The Contractor's Project Manager will conduct spot checks for compliance with committed measures.	
AQ-2 Local air quality impacts due to operation – particulates	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
AQ-3 Local air quality impacts due to operation – carbon monoxide	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Noise and Vibration			
NO-1 No residences would be affected by operational noise above threshold levels with implementation of the DNA project south of the American River.	Less than Significant Impact	**MNO-1**: Despite the finding that noise impacts would be limited to some areas within the American River Parkway, the following noise control measures will be implemented to ensure that noise levels during operation will not exceed the calculated levels: • At locations where the project would include an aerial guideway, the use of side-walls is an example of a technique that may be used to effectively mitigate the noise effects of the project. • At locations along the alignment where there are tight-turn radii in the tracks, wheel squeal may become a source of noise complaints. To avoid wheel squeals, it is recommended that the track turn radius be kept above 1,000 feet at all locations. If this is not possible, then rail lubrication on sharp turns will reduce or minimize squeals. • As rails wear, both noise levels may increase. Grind down or replace worn rail to maintain initial operating levels of noise and vibration. Also, wheel truing, the grinding down of flat spots on the rails' wheels that occur due to braking, will reduce noise and vibration effects. Overall vehicle maintenance will help reduce the likelihood of increased noise and vibration. Details of noise control measures will be evaluated during the final design stage of the project.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
NO-2 Construction would result in temporary noise impacts along developed portions of the DNA Corridor.	Potentially Significant Impact	**MNO-2**: Mitigation during construction will include the following: • Use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation and existing buildings can shield construction noise. Staging areas should be kept as far from sensitive noise receptors as possible. Construct noise barriers, such as temporary walls or piles of excavated material, between noisy activities and noise-sensitive receivers. • Avoid residential areas when planning haul truck routes. • Replace noisy equipment with quieter equipment, such as a vibratory pile driver instead of a conventional pile driver, enclosed air compressors, and mufflers on all engines. • Adjust construction timing or sequence to stage to avoid sensitive times of the day. Combine noisy operations so they occur in the same time period. The total noise level produced will not be significantly greater than the level produced if the operations were performed separately. • Prepare a Noise Control Plan that outlines allowable day and nighttime uses, projected noise levels and locations and types of noise abatement measures that may be required to meet specified noise limits. • Avoid impact pile driving where possible in noise-sensitive areas. Drilled piles or the use of a sonic or vibratory pile driver are more quiet alternatives where the geological conditions permit their use. • Select more quiet demolition methods, where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower cumulative noise levels than impact demolition by pavement breakers.	Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
VB-1 Vibration resulting from the implementation of the DNA project south of the American River would not affect sensitive land uses in Downtown or along Richards Boulevard; all predicted vibration levels are below the impact criteria.	Less than Significant Impact	No mitigation is required for any alternative.	Less than Significant Impact
VB-2 Construction of the DNA project is anticipated to result in temporary vibration impacts in developed areas along the alignment. This would affect residents along 7th Street, in South Natomas and in North Natomas. The 2,600 residents located within 100 feet of the alignment would potentially be the most affected.	Potentially Significant Impact	**MVB-2**: Construction mitigation for vibration is similar to mitigation for noise impacts. Construction vibration mitigation will be evaluated and refined during the preliminary engineering phase. The following are general approaches to mitigating vibration during construction: • Emphasis on avoiding vibration-intensive equipment such as pile driving, where possible, in vibration-sensitive areas. Drilled piles or the use of sonic or vibratory pile drivers cause lower vibration levels where the geological conditions permit their use. • Demolition methods that do not involve impacts should be selected where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower vibration levels than impact demolition by pavement breakers, and milling generates lower vibration levels than excavation using clam shell or chisel drops. Construction vibration mitigation will be better defined at preliminary engineering.	Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Biological Resources			
BIO-1 Riparian vegetation would be adversely affected by direct removal of vegetation and by inhibition of tree regeneration due to shading and obstruction by the elevated guideway.	Potentially Significant Impact	**MBIO-1**: To minimize impacts associated with the loss of riparian forest and willow-cottonwood scrub, including habitat fragmentation, RT shall implement the following measures: • Route the DNA project to avoid as much riparian forest and willow-cottonwood scrub as possible. Staging areas shall be sited in previously disturbed areas of the parkway. During construction, equipment and vehicles shall remain away from tree drip-lines and be restricted to as small an area as necessary to complete the work. As directed by the biological monitor, the construction limits shall be fenced to minimize damage to riparian vegetation. • Minimize the width of the maintenance right-of-way under the guideway. • Compensate for the permanent loss of riparian forest within the LRT right-of-way through restoration of riparian forest at a suitable site within the American River Parkway. The mitigation goal will be to restore the functional values, habitat connectivity, and density of mature, riparian forest in the Lower American River to that of current conditions. Several areas are available for this restoration effort, but a specific site has not been identified at this time. Candidate sites include: (1) the Urrutia property – 120-acres in total - which could be acquired with funding support from RT, and (2) other nearby sites designated as "Category 2" restoration sites (suitable for riparian habitat restoration) in the Lower American River Task Force's Lower American River Corridor Management Plan. • Replant riparian tree species, such as Valley Oak, Fremont Cottonwood, and Oregon Ash within the construction zone as close as feasible to the elevated guideway. • Restore willow-cottonwood habitat adjacent to the right-of-way in areas where it is disturbed by construction activities.	Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-1 (cont'd)		• All plantings and subsequent monitoring shall be designed by a riparian ecologist experienced in riparian habitat restoration as part of the management and monitoring plan.	
BIO-2 The temporary disturbance of about 2-acres of ruderal/grassland habitats along the American River Crossing would reduce the amount of foraging habitat for Swainson's hawk and other raptors during construction.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
BIO-3 Construction activities during the nesting season could disturb nesting Swainson's hawks, causing them to abandon occupied nests.	Potentially Significant Impact	**MBIO-3**: Construction near raptor nests shall be avoided during the raptor nesting season in accordance with the following guidelines or in accordance with other applicable guidelines published by CDFG. If breeding Swainson's hawks (e.g., individuals exhibiting nest building or nesting behavior) are identified, no new disturbance (e.g., heavy equipment operation associated with construction) shall occur within 0.5 mile of an active nest site between March 15 and September 15 or until a qualified biologist, with concurrence of the CDFG, has determined that the young have fledged or that the nest is no longer occupied. If construction or other project-related activities that could cause nest abandonment or forced fledging are proposed within the buffer zone, monitoring (funded by the project sponsor) by a CDFG-approved raptor biologist will be required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-4 The study area does not include designated critical habitat for the beetle, but elderberry bushes may be adversely affected by the American River Crossing. The loss of elderberry shrubs is considered a "take" of valley elderberry longhorn beetles under the federal Endangered Species Act.	Potentially Significant Impact	**MBIO-4**: The loss of elderberry shrubs is considered a "take" of the Valley Elderberry Longhorn Beetle under the Federal Endangered Species Act. RT shall implement the following mitigation measures to avoid and minimize impacts to VELB: • To the maximum extent practicable, the project shall be designed to avoid stands of elderberry shrubs and to avoid isolation of elderberry plants. • Pre-construction surveys at the construction site shall be conducted to assess the need for mitigation and compliance with the conditions of the USFWS *Conservation Guidelines for the Valley Elderberry Longhorn Beetle* (USFWS, 1999). • Compensatory habitat will be created in the American River Parkway to mitigate for take of valley elderberry longhorn beetles resulting from unavoidable loss of elderberry shrubs. A suitable site will be identified during early consultation with the USFWS.	Less than Significant Impact
BIO-5 Potentially suitable habitat for the giant garter snake is present in and along Bannon Slough. Loss or degradation of habitat used by the giant garter snake for foraging, basking, or winter burrows could result in take of the species.	Potentially Significant Impact	**MBIO-5**: To avoid and minimize the loss of potential giant garter snake habitat associated with Bannon Slough and rice fields, canals/drains and adjacent uplands associated with undeveloped land in North Natomas, RT shall implement the following mitigation measures: • To the maximum extent possible, guideway piers shall not be placed in Bannon Slough or immediately adjacent to Bannon Slough to avoid potential snake foraging, basking, and winter burrowing habitat. • To the extent appropriate, the project proponent shall petition for inclusion in the Natomas Basin HCP and Metro Air Park HCP and mitigate project impacts pursuant to the guidelines and standards established in these HCPs.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-5 (cont'd)		• For areas not included in the above-mentioned HCPs (e.g., American River Parkway and Greenbriar), the project proponent shall enter into consultation with the USFWS to develop a separate mitigation plan that will be consistent with the conservation goals established in the Natomas Basin HCP, Metro Air Park HCP, and The *Programmatic Formal Consultation for U.S. Army Corps of Engineers 404 Permitted Projects with Relatively Small Effects on the Giant Garter Snake within Butte, Colusa, Glenn, Fresno, Merced, Sacramento, San Joaquin, Solano, Stanislaus, Sutter and Yolo Counties, California* (USFWS, 1997). • Guideway piers shall be placed outside of canals. • The American River Crossing guideway shall be elevated above canals or culverts provided. • If construction of a culvert is necessary, a qualified herpetologist familiar with the habitat requirements of the giant garter snake shall assist in the culvert design. • All construction activity involving disturbance of habitat, such as site preparation and initial grading, will be restricted to the period between May 1 and September 30. This is the active period for giant garter snake and direct mortality is lessened, because snakes are expected to actively move to avoid danger. Pre-construction surveys for giant garter snake will be conducted by a qualified biologist approved by USFWS. If giant garter snake habitat is found within a specific site, the following additional measures will be implemented to minimize disturbance of habitat and harassment of giant garter snake, unless the project is specifically exempted by USFWS: – Between April 15 and September 30, all irrigation ditches, canals, or other aquatic habitat shall be completely dewatered for at least 15 consecutive days prior to the excavation or filling of the dewatered habitat.	

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-5 (cont'd)		– For sites that contain giant garter snake habitat, the project area shall be surveyed for the presence of giant garter snake no more than 24 hours prior to the start of construction activities. If construction activities stop on the site for a period of two weeks or more, a new giant garter snake survey shall be completed no more than 24 hours prior to the re-start of construction activities. – Clearing shall be confined to the minimum area necessary to facilitate construction activities. Giant garter snake habitat within or adjacent to the project shall be flagged and designated as Environmentally Sensitive Areas and avoided by all construction personnel. – Construction personnel completing site preparation and grading operations shall receive USFWS approved environmental awareness training. This training instructs workers on how to identify giant garter snakes and their habitats, and what to do if a giant garter snake is encountered during construction activities. An on-site biological monitor shall be designated during training. – If a live giant garter snake is found during construction activities, the biological monitor and USFWS shall be notified immediately and all construction in the vicinity of the snake shall stop to allow the snake to leave on its own. The snake shall be monitored for the remainder of the work day to make sure the snake is not harmed or if it leaves the site, does not return. If a giant garter snake does not leave on its own within one working day, further consultation with USFWS is required. Notification to the Service's Division of Law Enforcement or the Sacramento Fish and Wildlife Office must be made within one working day of locating dead, injured, or sick giant garter snakes. Written notification to both offices must be made within three calendar days and must include the date, time, and location of the finding of a specimen and any other pertinent information.	

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-5 (cont'd)		• Upon completion of construction activities, all temporary fill and/or construction debris shall be removed from the site. If this material is located near undisturbed giant garter snake habitat and is to be removed between October 1 and April 30, it shall be inspected by a qualified biologist to assure that giant garter snakes are not using it as winter habitat.	
BIO-6 Construction of the DNA project would require the placement of an estimated two piers in the American River. The cofferdam placement and pile driving required for pier construction could impact salmon and steelhead populations during construction.	Potentially Significant Impact	**MBIO-6**: To mitigate the impacts from cofferdam construction and dewatering on anadromous salmonids and other fishes, RT shall implement the following measures: • Cofferdams shall be constructed by the sequential placement of sheetpiles from the upstream to the downstream end of the portion of structure to be enclosed by the cofferdam. Prior to completion of the cofferdam, seining with a small-mesh seine shall be conducted within the cofferdam to remove as many fish as possible. Exclusionary nets shall be placed in the river to prevent fish from entering the cofferdam during the final stages of cofferdam placement. • A qualified biologist shall be on site to examine the cofferdams prior to dewatering, and a fish rescue/salvage program shall be conducted prior to complete dewatering of the cofferdam interior. • Only low-flow pumps with screened intakes shall be used during dewatering operations. If fish are still present after partial dewatering of the cofferdam and further seining cannot rescue all individuals of listed species, then electrofishing shall be used to capture any remaining fish. Rescued fish shall be immediately transferred to an oxygenated holding tank and transported to an appropriate downstream release site.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-6 (cont'd)		• All pumped water shall be routed to either: (1) a sedimentation pond located on a flat stable area above the ordinary high water mark that prevents silt-laden runoff from entering the river or (2) a sedimentation tank/holding facility that allows only clear water to return to the river and includes disposal of settled solids at an appropriate off-site location. • No guideway piers shall be placed in Bannon Slough. Construction of the American River Crossing will require issuance of a Streambed Alteration Agreement from CDFG. One of the conditions of the agreement is likely to be a "work window" for construction activities. There is a "default" work window of April 15 through October 15, which can "open" or "close" depending on the type of work and its proximity to the river (e.g., dependent on whether it is in the water or on the bench). Construction of the American River Crossing will be limited to the work window specified in the Streambed Alteration Agreement.	
BIO-7 Approximately 100 linear feet of riparian habitat would be disturbed along the banks of the Lower American River and Bannon Slough in association with construction of the new river crossing.	Potentially Significant Impact	**MBIO-7**: To mitigate the impact on aquatic habitat, RT shall implement the following measures: • Implement mitigation measures proposed above for the replacement of riparian forest and willow-cottonwood scrub. • The project sponsor shall enter into consultation with the National Oceanic and Atmospheric Administration to determine if additional mitigation measures may be necessary for authorization under the Endangered Species Act. • The project sponsor shall enter into consultation with CDFG to determine if additional mitigation measures may be necessary for issuance of a Streambed Alteration Agreement permit. The loss of riverbed and streamside vegetation resulting from project construction is not expected to jeopardize the survival and recovery of listed fish species or adversely modify critical habitat for these species.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
BIO-8 The loss of riverbed and streamside vegetation resulting from project construction is not expected to jeopardize the survival and recovery of listed fish species or adversely modify critical habitat for these species.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
BIO-9 The loss of approximately 7.4-acres of agricultural land within Greenbriar (associated with the DNA project right-of-way) would affect the amount of foraging habitat for special-status species that use alfalfa, grain crops, fallowed fields, or flooded fields for foraging.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
BIO-10 Impacts to giant garter snakes could result from the conversion of approximately 7.4-acres of potential habitat on undeveloped land in Greenbriar.	Potentially Significant Impact	Implement Mitigation Measure MBIO-5, above.	Less than Significant Impact
BIO-11 Construction activities adjacent to agricultural drainage or irrigation canals could disturb nesting burrowing owls or destroy potential nesting habitat for burrowing owls.	Potentially Significant Impact	**MBIO-11**: Pre-construction surveys for burrowing owls shall be conducted prior to the initiation of grading or earth-disturbing activities to determine if any burrowing owls are using the site for nesting or foraging. Surveys will be conducted by a qualified biologist. If nest sites are found, the CDFG will be contacted regarding suitable mitigation measures, which may include a 300-foot buffer around the nest site during the breeding season (February 1 through August 31) or a relocation effort for burrowing owls.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Hazardous Materials			
HM-1 The assessment performed in 2002 revealed 10 potential hazardous substances sites or conditions (e.g., residual and persistent pesticide use) that could be encountered during construction of the DNA project south of the American River. Construction of the DNA project in South Natomas could involve the same general concerns as described above. Further north, the ESA indicated the probable presence of residual pesticide-contaminated soils and groundwater that could be encountered during construction of the DNA project. Additionally, there is the potential for hazardous wastes associated with the wastewater ponds located to the immediate south of the Airport and contaminated groundwater associated with the storage of petroleum products on Airport property.	Potentially Significant Impact	**MHM-1**: As required by DTSC, RT will perform a Phase II Environmental Site Assessment to determine the presence and extent of contamination at properties to be purchased or condemned within the DNA project, at stations, and at the maintenance facility site. However, because of the potential to discover undocumented hazardous substance releases or cause spills during construction, RT also will prepare a Soil and Groundwater Management Plan prior to commencement of construction to handle site contingency planning. This plan will include the following requirements: • A registered geologist or engineer onsite or on-call to monitor construction activities, and with the authority to halt work or move work temporarily to another location if contamination is encountered during construction. • A Health and Safety Specialist onsite or on-call to monitor suspect areas during construction (e.g., near hazardous substance release sites). • An Environmental Compliance Manager onsite or on-call to supervise hazardous material use and storage during construction. • A plan to contact the applicable landowner (if the land is not owned by RT) in the event hazardous substances are encountered. • Meetings with applicable state and local agencies concerning undocumented contamination encountered. • An asbestos and lead-based paint survey of all structures to be demolished that were initially constructed during an era when these materials were commonly used in construction.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
HM-1 (cont'd)		• Coordination with Underground Service Alert prior to construction, especially in locations where pipeline markers are displayed or as-built plans indicate the possibility of a subsurface utility line(s). In addition, pipeline companies (e.g., PG&E) should be contacted to mark the location of pipelines so that they may be avoided. • A well survey completed prior to commencement of construction activities to evaluate the status (e.g., active, decommissioned, decommission in progress) of the monitoring wells along the DNA Corridor. Wells within the proposed construction zone should be decommissioned prior to the start of construction activity. • Coordination with Sacramento Municipal Utility District (SMUD) if transformers are to be moved or removed. • Coordination with the RWQCB regarding the status of the wastewater pond closure near the Airport. • Implementation of construction best management practices (BMPs) in accordance with a Stormwater Pollution Prevention Plan. BMPs may include providing secondary containment areas for refueling construction equipment, berms or ponds to control runoff, and a monitoring program to test stormwater for contaminants prior to discharge from the construction site. • Compliance with OSHA requirements for construction workers who may be exposed to hazardous materials, including preparation of health and safety and emergency response plans, air monitoring (if necessary), and provision of personal protective equipment. • Once a Phase II site assessment is completed, a Remedial Action Work Plan will be developed in coordination with the California Department of Toxic Substances Control. This plan will contain specifics on the remediation for the hazardous materials encountered during the construction of the project.	

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Utilities			
UTIL-1 Implementation of the DNA project south of the American River would involve construction on 7th Street, which would create longitudinal conflicts with several existing utilities. As a result of the American River crossing, there would be 2,100 feet of utilities that parallel the track alignment that may require relocation and 16 crossing locations that may require encasement or reinforcement on intersections along Richards Boulevard. Various utilities situated along a total length of 7,050 feet of track alignment parallel to Truxel Road would require potential relocation, and 20 crossing locations may require encasement or reinforcement. Various utilities may require encasement or reinforcement at 31 crossing locations.	Potentially Significant Impact	**MUTIL-1**: If relocation of a particular utility is necessary, as determined by the utility company or agency, the design and the actual relocation construction can proceed in a number of ways. For many of the public utilities (water, storm drainage, and sanitary sewer), the engineer for the project will design the relocation (subject to review and approval of the utility/agency) and the contractor will construct the relocation. For franchised utilities (PG&E, SBC, and so forth), the utility companies will generally design and relocate their facilities prior to construction. These relocation costs, in many cases, would be charged to the DNA project. The following mitigation measures will be implemented to minimize utility impacts: • Prior to construction, the implementing agency or contractor will identify the locations of existing utility lines and all known utility lines will be avoided during construction. • Community outreach will notify affected residents and businesses of temporary disruption of services. • Where the alignment crosses over utilities and damage to the utility is possible, the utility line will be encased in reinforced concrete.	Less than Significant Impact
Energy Resources and Greenhouse Gas Emissions			
ENG-1 Construction of the DNA project is estimated to consume 708,500 million BTUs.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Water Resources			
WR-1 Changes in local drainage patterns in the Alkali Flat/Railyards/Richards Boulevard area would be limited to the increase in impervious surfaces associated with project improvements. The guideway and parking facilities would add up to 11-acres of new impervious surface to the area. Construction of the guideway, parking lots, and a potential maintenance facility in North Natomas would add up to about 30-acres of new impervious surface to the area, but it would not change local drainage patterns. Construction of the guideway, parking lots, and a potential maintenance facility in the Sacramento County portion of the project area would add up to about 25-acres of impervious surface to the area.	Less than Significant Impact	No mitigation is required. Existing storm water ordinances require the mitigation of runoff to be consistent with historic, undeveloped levels, offsetting any impacts.	Less than Significant Impact
WR-2 The DNA project south of the American River would not affect the river's hydrology or otherwise interfere with flood management efforts in this area.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
WR-3 Construction of transit improvements north of the American River would affect the American River Parkway. The degree of impact on the American River, including water surface elevations during flood conditions, was analyzed using HEC-RAS, a hydrologic software program, showing that all bridge crossings would result in changes to the water surface elevation of less than 0.1 feet, which is the criterion recommended by SAFCA.	Less than Significant Impact	**MWR-3**: Changes in water surface elevation in the American River would be less than the criteria recommended by SAFCA. The technical report prepared in support of the analysis recommends that additional analysis take place during the PE phase using more sophisticated tools. Because of this recommendation, the following mitigation measure is recommended: • A two-dimensional hydraulic model should be run for the final bridge configuration and location to ensure a higher level of accuracy for use in calculating final water surface elevations, pier scour potential, and possible bank protection needs. • As discussed above, construction areas within the American River Parkway are subject to periodic inundation from high water conditions. CDFG maintains a standard work window of between April 1 and October 31. Work outside of this window could only occur with the authorization of the CDFG, and will be allowed only if the contractor had the ability to quickly shut down and stabilize the site.	Less than Significant Impact
WR-4 Most of the guideway area would be located in areas that are already developed or would be developed during the 2027 planning horizon, and therefore drainage patterns would remain approximately the same.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
WR-5 Substantial excavation is not expected; as such, there is likely to be no need for dewatering and disposal of potentially contaminated groundwater.	Less than Significant Impact	No mitigation is required. Erosion and runoff from the construction sites will be controlled by the City's Grading ordinance and the Central Valley Regional Water Quality Control Board NPDES construction program, which require the preparation of erosion and sediment control plans prior to construction.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
WR-6 This construction activity is not expected to contribute to water quality impacts in receiving waters because the extent of soil disturbance would be minor (e.g., relative to site grading) and limited to a narrow linear corridor.	Less than Significant Impact	No mitigation is required beyond compliance with local storm water ordinances and the City's Standard Specifications for Public Works Construction (2006) and the County's Standard C*onstruction Specifications* (2004).	Less than Significant Impact
WR-7 Long-term water quality effects of the DNA project (related to operation of light rail in perpetuity) would be associated with the release of pollutants (oil and grease, brake dust) from trains and from vehicles at parking lots.	Less than Significant Impact	No mitigation is required. Erosion and runoff from the construction sites will be controlled by the City's Grading ordinance and the Central Valley Regional Water Quality Control Board NPDES construction program, which require the preparation of erosion and sediment control plans prior to construction. In addition, standard best management practices, such as the use of control measures such as silt curtains and treatment of water pumped from cofferdams, will be implemented.	Less than Significant Impact
WR-8 With regard to the planned crossing of the American River, trains could directly contribute pollutants to the American River.	Less than Significant Impact	No mitigation is required. Erosion and runoff from the construction sites will be controlled by the City's Grading ordinance and the Central Valley Regional Water Quality Control Board NPDES construction program, which require the preparation of erosion and sediment control plans prior to construction. In addition, standard best management practices, such as the use of control measures such as silt curtains and treatment of water pumped from cofferdams, will be implemented.	Less than Significant Impact
WR-9 Construction of piers in the American River could mobilize sediment, including sediment containing mercury and other contaminants, and therefore efforts should be implemented to contain sediment mobilized by construction activity.	Less than Significant Impact	No mitigation is required beyond compliance with local storm water ordinances and the City's Standard Specifications for Public Works Construction (2006) and the County's Standard C*onstruction Specifications* (2004).	Less than Significant Impact
WR-10 Navigability is expected to be maintained at current levels because the American River crossing is expected to match or exceed the elevation of the existing I-5 Bridge, and therefore it would not present a new barrier to navigation.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Wetland Resources			
WET-1 The river crossing would involve the placement of two permanent bridge piers within the active channel of the American River and several piers in the adjacent riparian/floodplain habitat. Wetland resources in these areas could be adversely affected by alterations to wetland vegetation as a result of the new river crossing structure (e.g., by construction activities, shading, or on-going vegetation clearance requirements). Construction of the crossing would result in the long-term loss of approximately 1.75-acres of riparian habitat in the American River Parkway. Temporary and permanent wetland impacts would be 0.619 acres and 1.948 acres, respectively.	Potentially Significant Impact	**MWET-1**: Mitigation for temporary and long-term impacts to wetlands will include the following: • Minimizing the extent of disturbance to the maximum extent practicable, implementing compensatory mitigation for the loss of wetland habitat functions and values, and revegetating all temporarily disturbed areas. • For compensatory mitigation, RT will pay in-lieu fees or purchase credits at one of many nearby mitigation banks. Once a delineation has been conducted, the amount of wetland impact area will be refined. • A wetland mitigation and monitoring plan will be developed in cooperation with the USACE.	Significant Impact

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Summary of Construction Impacts			
The construction of the DNA project south of the American River would be disruptive to downtown Sacramento and Alkali Flats. These impacts would include noise, dust, and traffic congestion due to disruption of local streets, utility relocation and visual degradation for the duration of construction. Impacts from implementation of the DNA project north of the American River would be similar. Viewed in total, the construction of the DNA project would disrupt approximately 150 acres including the alignment, parking facilities and the maintenance facility. The impact of construction would be greatest to the 3,639 persons estimated to live within 300 feet of the alignment. As many as 23 businesses would be acquired for the DNA project north of the American River. Fourteen to fifteen acres of parkland would be disturbed in the American River Parkway for implementation of the DNA project. The construction duration for MOS-1 is estimated at 25-27 months and the DNA project north of the American River, including the river crossing, would take 36 months for construction.	Significance levels are presented for each environmental resource in Sections 4.2 through 4.19.	Implement the following mitigation measures: Construction mitigation measures include the use of best practices and, more importantly, avoidance of impacts to the extent possible through well-designed options. Construction mitigation measures for all environmental resources are presented individually in Sections 4.2 through 4.19. Other measures shall include: A Construction Mitigation Plan will be developed that will be a key measure for off-setting the construction impacts referenced above. This plan will be developed within the first month of receiving Notice to Proceed with construction. The plan will be developed in cooperation with the City of Sacramento, South Natomas and North Natomas. The Construction Mitigation Plan will include the following key elements: • Communications Plan • Construction Operation Agreement • Waste Management Plan (also see Section 4.15, Hazardous Materials) • Storm Water Management (also see Section 4.18, Water Resources and 4.19, Wetland Resources) • Traffic Circulation Plan • Construction Dust and Emissions Control Plan (also see Section 4.12, Air Quality) • Construction Noise Plan (also see Section 4.13, Noise and Vibration)	Significance levels after mitigation are presented for each environmental resource in Sections 4.2 through 4.19.

Table 2-6 (Cont'd)
Summary of Impacts and Proposed Mitigation for the DNA Project

Impact	Significance	Mitigation	Significance after Mitigation
Cumulative and Growth-Inducing Impacts			
The analysis of cumulative effects includes those projects evaluated in the 2006 MTP. Construction-phase mitigation measures have been included to the effects of the DNA project together with other projects in the American River area, including the construction of HOV lanes on I-5.		The following mitigation measures will be implemented: • RT shall work with Caltrans to coordinate the planning for construction improvements so that construction-related conflicts (e.g., disruption of recreation users, visual impacts, habitat and species impacts, traffic impacts) can be minimized. This will be achieved through joint project management, joint offsite habitat restoration, coordinated public information, and other means, as appropriate. • For projects in the lower reaches of the American River with the potential to substantially affect the water surface elevation in the American River (e.g., by placing new piers or berms in the floodplain), hydrologic studies shall be conducted to address potential changes in a quantitative manner. Project proponents shall conduct these studies in consultation with SAFCA, the Reclamation Board, and other appropriate flood control officials.	

CHAPTER 3.0: COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT PEIR

3.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft PEIR for the DNA project, were raised in comments on the Draft PEIR. RT, acting as lead agency, directed that responses to the comments on the Draft PEIR be prepared. Responses to comments received do not involve any new significant impacts or "significant new information" that would require recirculation of the Draft PEIR pursuant to CEQA Guidelines Section 15088.5.

3.2 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft PEIR:

Table 3-1
List of Commenters

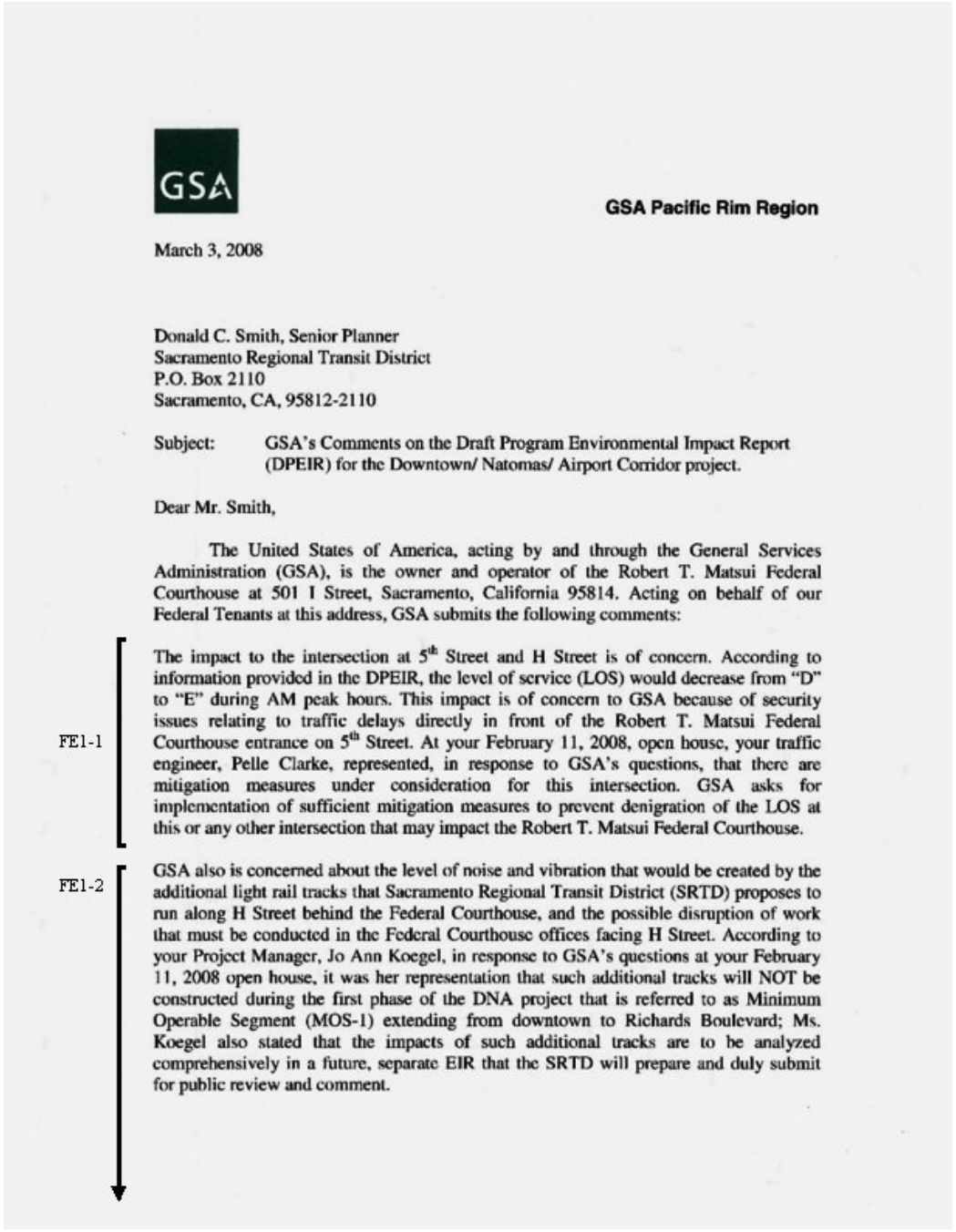
Letter	Individual or Signatory	Affiliation	Letter Dated
FE1	Morris Angell	General Services Administration, Pacific Rim Region	3/03/08
ST1	Dawn Chesar	State of California, Department of Transportation	2/26/08
ST2	Kevin Boles	State of California Public Utilities Commission	2/25/08
ST3	Zachary Miller	State of California, Department of General Services	2/25/08
ST4	Christopher Huitt	State of California, Department of Water Resources	1/10/08
CI1	Dana Allen	City of Sacramento, Department of Parks and Recreation	2/26/08
CI2	Jeanne Corcoran	City of Sacramento, Department of Transportation	2/25/08
CI3	Robert Cunningham	City of Sacramento, Planning Department	2/25/08
CO1	Matthew Darrow	Sacramento County, Department of Transportation	1/08/08
CO4	John Febbo	Sacramento County Airport System	2/05/08
CO5	Gary Kukkola	Sacramento County Regional Parks	2/21/08
CO6	Ron Maertz	Sacramento Metropolitan Air Quality Management District	2/20/08
OA1	Mike McKeever	Sacramento Area Council of Governments	2/26/08
LC1	Warren Truitt	Save the American River Association, Inc.	2/25/08

Table 3-1 (Cont'd)
List of Commenters

Letter	Individual or Signatory	Affiliation	Letter Dated
LC2	Becky Heieck	North Natomas Transportation Management Association	2/25/08
LC3	Linn Hom	Natomas Community Association	2/25/08
LC4	Michael Devereaux	Law Offices of Gregory D. Thatch	3/4/08
LC5	Graham Brownstein	Environmental Council of Sacramento	2/24/08
I1	Nico Forte	Individual	No date
I2	Ray Dale	Individual	2/01/08
I3	Chris Mazzarella	Individual	2/20/08
I4	Eve Abrahams	Individual	2/09/08
I5	Kim Tremaine	Tremaine & Associates, Inc.	2/22/08
I6	James Morgan	Individual	2/25/08
I7	James Wiley	Taylor and Wiley	2/25/08
I8	Walt Seifert	Sacramento Area Bicycle Advocates	2/26/08
I9	Reed Benet	Individual	2/26/08
I10	Ken Mayes	Individual	2/26/08
I11	Julie Nichols	Individual	2/23/08
I12	Linn Hom	Individual	2/20/08
I13	jgoralka@hotmail.com	Individual	2/25/08
I16	Richard Wilkens	Individual	2/13/08
I17	Sara Provancha	Sioukas Investments	2/22/08
I18	Roger McCardle	Individual	2/11/08
I19	Jarrod Baniqued	Individual	2/11/08
I20	Brandon Stepp	Individual	2/11/08
I21	Michael Brady	Individual	2/9/08
I22	Michael Brady	Individual	2/9/08
I23	Anastasia Small	Individual	2/9/08
I24	global1recrutr@yahoo.com	Individual	12/29/07
I25	Anthony Bibb	Individual	2/8/08
I26	Sabas Chois	Individual	2/8/08
I31	Justin Au	Individual	2/7/08

Table 3-1 (Cont'd)
List of Commenters

Letter	Individual or Signatory	Affiliation	Letter Dated
I35	Christine Paros	Individual	2/9/08
I36	Sandra Hamameh	Individual	2/9/08
I37	Ronald and Jeannie Raefs	Individual	2/9/08
I38	Bruce Roberts	Individual	2/9/08
I39	Barbara Stanton	Ridership for the Masses	2/9/08
I40	Carol Thomas	Individual	2/9/08
I41	Juanita Carranco	Individual	2/9/08
I42	Barbara Alston	Individual	2/9/08
I43	James Tastch	Individual	2/9/08
I44	Brooks Truitt	Individual	2/11/08
I45	Linda Luhman	Individual	2/11/08
I46	James Fishel	Individual	2/11/08
I47	Whitney Yamamura	American River College	2/11/08
I48	Richard Seyman	Individual	2/11/08
I49	Farrell Wheeler	Individual	2/11/08
I58	Beverly Louie	Individual	2/25/08
I59	David Von Aspern	Individual	2/26/08
I60	Leoma Lee	Individual	2/25/08
I61	Walt Seifert	Individual	2/25/08
I62	Mike Barnbaum	Individual	2/25/08
I63	William Lowell	Individual	2/25/08
I64	James Morgan	Individual	2/25/08
I65	Eve Abrahams	Individual	2/25/08
I66	Reed Benet	Individual	2/25/08
I67	Richard Seyman	Individual	2/25/08
I68	Arthur Ketterling	Individual	2/25/08
I69	Randell Hansen	Individual	2/25/08



GSA

GSA Pacific Rim Region

March 3, 2008

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

Subject: GSA's Comments on the Draft Program Environmental Impact Report (DPEIR) for the Downtown/ Natomas/ Airport Corridor project.

Dear Mr. Smith,

The United States of America, acting by and through the General Services Administration (GSA), is the owner and operator of the Robert T. Matsui Federal Courthouse at 501 I Street, Sacramento, California 95814. Acting on behalf of our Federal Tenants at this address, GSA submits the following comments:

FE1-1 The impact to the intersection at 5th Street and H Street is of concern. According to information provided in the DPEIR, the level of service (LOS) would decrease from "D" to "E" during AM peak hours. This impact is of concern to GSA because of security issues relating to traffic delays directly in front of the Robert T. Matsui Federal Courthouse entrance on 5th Street. At your February 11, 2008, open house, your traffic engineer, Pelle Clarke, represented, in response to GSA's questions, that there are mitigation measures under consideration for this intersection. GSA asks for implementation of sufficient mitigation measures to prevent denigration of the LOS at this or any other intersection that may impact the Robert T. Matsui Federal Courthouse.

FE1-2 GSA also is concerned about the level of noise and vibration that would be created by the additional light rail tracks that Sacramento Regional Transit District (SRTD) proposes to run along H Street behind the Federal Courthouse, and the possible disruption of work that must be conducted in the Federal Courthouse offices facing H Street. According to your Project Manager, Jo Ann Koegel, in response to GSA's questions at your February 11, 2008 open house, it was her representation that such additional tracks will NOT be constructed during the first phase of the DNA project that is referred to as Minimum Operable Segment (MOS-1) extending from downtown to Richards Boulevard; Ms. Koegel also stated that the impacts of such additional tracks are to be analyzed comprehensively in a future, separate EIR that the SRTD will prepare and duly submit for public review and comment.

Letter FE1. General Services Administration

Response to Comment FE1-1

Comment noted. Future project-level engineering and environmental review will provide an opportunity to further evaluate the DNA project's potential impacts on traffic and circulation, including impacts to the intersection at 5th and H Street, and to refine mitigation measures for these impacts.

Response to Comment FE1-2

The Minimum Operable Segment (MOS-1) is described in Section 2.7, page 2-12 of the Draft PEIR,

"For MOS-1, the alignment would begin at 7th and H Streets running north on 7th Street to F Street. This alignment is the same as the emergency courthouse by-pass described above, and would remain in service with full implementation of the DNA project for periods when use of the by-pass is requested by the U.S. District Court."

FE1-2

At your February 11, 2008, open house, your project manager, Jo Ann Koegel, further represented in response to GSA's questions, that the "H Street Station" that was depicted on your presentation drawings, in fact, will be constructed not as shown, but along 8th Street and farther away from the Federal Courthouse. Based on her assurances, GSA does not at this time have the same high level of apprehension as to the possible extent of adverse impact on the Federal Courthouse, its occupants and their ability to function effectively during and after the construction of your proposed new "H Street Station."

On behalf of GSA and all Federal tenants at the Robert T. Matsui Federal Courthouse, we thank you for your attention and consideration of our comments, and look forward to the release of the Final EIR.

If you have any questions, please feel free to call me at (415) 522-3473.

Sincerely,

Morris Angell, MAI, CCIM, MCR, Grad Cert NEPA
Senior Asset Manager &
Regional Environmental Quality Advisor
Portfolio Management Division
Capital Investment Branch

The proposed light rail track on H Street behind the Robert T. Matsui Federal Courthouse, which is not included as part of MOS-1, would be constructed as part of the DNA project at full build-out. The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of future stations, including the proposed "H Street Station". These assumptions will be revisited during future project-level engineering and environmental review. At that time, RT will coordinate with GSA to ensure consistency with operations at the Federal Courthouse. This coordination and resulting decisions will be summarized in future project-level CEQA documents.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 - SACRAMENTO AREA OFFICE
VENTURE OAKS MS 15
P.O. BOX 942874
SACRAMENTO, CA 94274-0001
PHONE (916) 274-0614
FAX (916) 274-0648
TTY (530) 741-4509

Flex your power!
Be energy efficient!

February 26, 2008

08SAC0003
03-SAC-05
Downtown/Natomas/Airport (DNA) Corridor
Draft Environmental Impact Report (DEIR)
SCH# 2001112093

Don Smith
Sacramento Regional Transit District (RT)
P.O. Box 2110
Sacramento, CA 95812

Dear Mr. Smith:

Thank you for the opportunity to review and comment on the DNA DEIR. Our comments are as follows:

ST1-1
- The proposed DNA LRT extension is a notable project for providing expanded travel options in the transportation corridor linking downtown Sacramento with Natomas neighborhoods and providing improved access to Sacramento International Airport. Caltrans is very supportive of this project and encourages Sacramento Regional Transit (RT) and its partners to look for opportunities to construct the project or project phases at the earliest date(s) possible.

ST1-2
- Caltrans commends RT for including the accommodation of bicycles and pedestrians on the proposed new crossing of the American River. This is an important component of the project as it will provide the only all-weather crossing of the American River for bicyclists and pedestrians traveling between Natomas and downtown.

ST1-3
- Caltrans is developing a Corridor System Management Plan for Interstate 5 (I-5) and State Route 99 and includes the DNA LRT Extension Project as one of the highest priority projects in the corridor. We look forward to continued collaboration with RT to improve multi-jurisdictional management of this corridor.

ST1-4
- Caltrans and RT will need to work together to ensure that all crossings of the State Highway System right of way, including Interstate 80 and State Route 99, are designed to accommodate future highway structural changes and enhancements. All DNA LRT project activities that take place in the State Highway right of way will

Letter ST1. Caltrans District 3, Office of Transportation Planning

Response to Comment ST1-1

Thank you for your comment. RT appreciates your support for the project.

Response to Comment ST1-2

Thank you for your comment. RT appreciates your support for the project

Response to Comment ST1-3

Thank you for your comment. RT appreciates your support for the project. RT looks forward to continued coordination with the Department of Transportation.

Response to Comment ST1-4

RT looks forward to continued cooperation with the Department of Transportation to ensure design of all crossing of the State Highway System right-of-way are designed to accommodate future highway structural change and enhancements. RT will contact the Department of Transportation to obtain the required encroachment permit well in advance of activities to be conducted within the State Highway right-of-way.

require an encroachment permit from Caltrans. Please contact us for assistance well before encroachment permits will be needed.

ST1-4

ST1-5

- In Table ES-6, Impact TRAN-4 on page ES-28, the Interstate 5 southbound Richards Boulevard off-ramp is listed under the summary of impacts. Proposed mitigation includes an additional shared left turn lane at the terminus of the ramp. The City of Sacramento is in the early stages of developing a project that will substantially modify the Richards Boulevard Interchange. Interim ramp improvements associated with that project include restriping that is similar to that proposed by the above mitigation. RT may want to reference the City's project in the FEIR rather than listing a separate mitigation for the DNA project.

ST1-6

- On page 3-48, please clarify what year is assumed for planned improvements.

ST1-7

- Table 3.7-1, states under 2014 No-Project conditions, that the I-5 Southbound off-ramp and Richards Boulevard intersection will operate at Level of Service (LOS) B in the AM Peak Hour. This is a far better service level than what we have seen in Sacramento City environmental documents for major development projects such as Township 9 and the Railyards. Presently this intersection is operating at LOS E. When the Township 9 project is built out, the LOS is forecast to fall to F conditions in 2013. Similar service levels are expected on other ramps and streets in the immediate vicinity. We found additional discrepancies in the DEIR regarding LOS for other freeway segments and interchange ramps and intersections. However, we do not find these discrepancies to be significantly linked to the DNA LRT project. We are thus not requesting that the figures be corrected in the FEIR, but are noting that we do not concur with the LOS figures used in the DEIR for state highway facilities.

If you have any questions about these comments please contact me at (916) 274-0614, or Gabriel Corley at (916) 274-0611.

Sincerely,

DAWN CHESER, Chief
Office of Transportation Planning—South

cc: State Clearinghouse

Response to Comment ST1-5

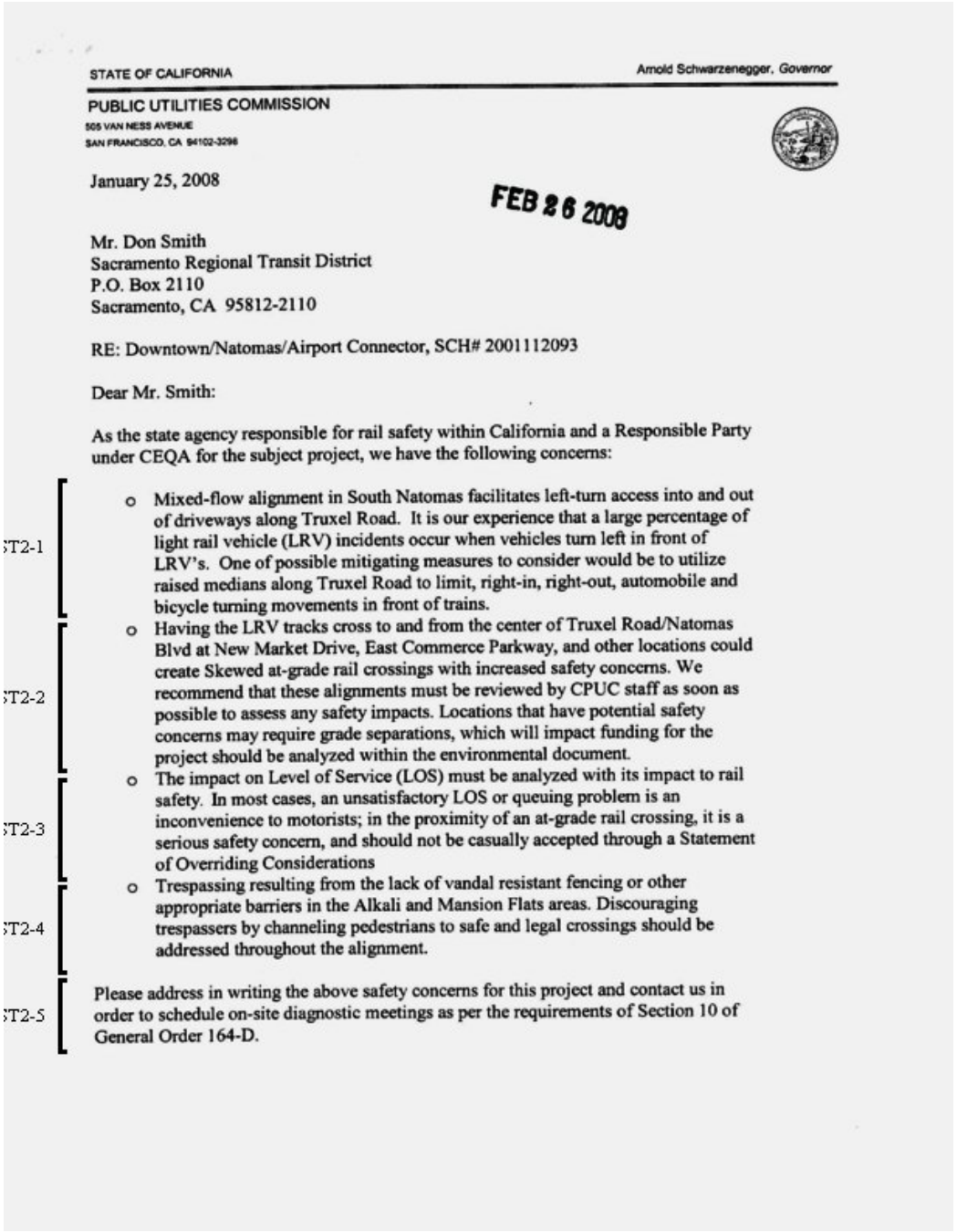
A mitigation measure proposed in the Draft PEIR is similar to one proposed by the City of Sacramento for the I-5 southbound Richards Boulevard off-ramp. The City of Sacramento is considering a range of options for improvements to the I-5 interchange at Richards Boulevard. RT will coordinate with the City of Sacramento to further consider and refine mitigations measures at this location during future project-level engineering and environmental review.

Response to Comment ST1-6

Future highway improvements are assumed to be completed by the year 2027.

Response to Comment ST1-7

The commenter notes that while they do not necessarily concur with intersection levels of service results at a few locations, they are not requesting revisions because such discrepancies are not significantly linked to the DNA project. RT will coordinate with the Department of Transportation and the City of Sacramento during future project-level engineering and environmental review of the project to refine levels of service along Richards Boulevard. At that time, consideration will be given to the latest baseline project information, including the Township 9 project and the Railyards project.



STATE OF CALIFORNIA — Arnold Schwarzenegger, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 25, 2008

FEB 26 2008

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

RE: Downtown/Natomas/Airport Connector, SCH# 2001112093

Dear Mr. Smith:

As the state agency responsible for rail safety within California and a Responsible Party under CEQA for the subject project, we have the following concerns:

ST2-1
- Mixed-flow alignment in South Natomas facilitates left-turn access into and out of driveways along Truxel Road. It is our experience that a large percentage of light rail vehicle (LRV) incidents occur when vehicles turn left in front of LRV's. One of possible mitigating measures to consider would be to utilize raised medians along Truxel Road to limit, right-in, right-out, automobile and bicycle turning movements in front of trains.

ST2-2
- Having the LRV tracks cross to and from the center of Truxel Road/Natomas Blvd at New Market Drive, East Commerce Parkway, and other locations could create Skewed at-grade rail crossings with increased safety concerns. We recommend that these alignments must be reviewed by CPUC staff as soon as possible to assess any safety impacts. Locations that have potential safety concerns may require grade separations, which will impact funding for the project should be analyzed within the environmental document.

ST2-3
- The impact on Level of Service (LOS) must be analyzed with its impact to rail safety. In most cases, an unsatisfactory LOS or queuing problem is an inconvenience to motorists; in the proximity of an at-grade rail crossing, it is a serious safety concern, and should not be casually accepted through a Statement of Overriding Considerations

ST2-4
- Trespassing resulting from the lack of vandal resistant fencing or other appropriate barriers in the Alkali and Mansion Flats areas. Discouraging trespassers by channeling pedestrians to safe and legal crossings should be addressed throughout the alignment.

ST2-5
Please address in writing the above safety concerns for this project and contact us in order to schedule on-site diagnostic meetings as per the requirements of Section 10 of General Order 164-D.

Letter ST2. Public Utilities Commission

Response to Comment ST2-1

Operational concerns regarding the alignment options considered in the Draft PEIR for Truxel Road in South Natomas will be subject to further evaluation and refinement during future project-level engineering and environmental review.

Response to Comment ST2-2

In regards to the skewed at-grade rail crossings potentially proposed at several locations, as described in the Draft PEIR, these alignments will be subject to further evaluation and refinement during future project-level engineering and environmental review. At that time, RT will coordinate review of the alignment by CPUC staff as soon as possible because locations with safety concerns requiring grade separations would impact funding for the project.

Response to Comment ST2-3

Unsatisfactory level of service in the proximity of an at-grade rail crossing may indicate a safety concern. As such, unsatisfactory levels of service should be analyzed with respect to safety. RT will coordinate with the CPUC during future project-level engineering and environmental review to assess safety issues that may occur as a result of unsatisfactory levels of service at at-grade rail crossing within the DNA project area.

If you have any questions in this matter, please call Dave Stewart, Utilities Engineer, at (916) 324-7134.

Very truly yours,

Kevin Boles
Environmental Specialist
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Terrel Anderson, Union Pacific Railroad
cc: Rufus Francis, SRTD Director of Safety

Response to Comment ST2-4

Appropriate barriers and proper channelization of pedestrian crossings will be considered during future project-level engineering and environmental review of the DNA project.

Response to Comment ST2-5

Comment noted. Responses to all comments received during the public comment period will be published in writing as part of the Final PEIR. In addition, please refer to responses to Comments ST2-1 through ST2-4. RT will coordinate with the PUC per the requirements of Section 10 of General Order 164-D during future project-level engineering and environmental review.

FEB-26-2008 11:49 ASSET PLANNING & ENHANCEM 916 3751830 P.02/03

State and Consumer Services Agency
DEPARTMENT OF GENERAL SERVICES
Real Estate Services Division - Asset Management Branch
707 Third Street, 8th Floor • West Sacramento, CA 95605 • (916) 376-1900
Fax (916) 376-1895 • www.dgs.ca.gov

February 25, 2008

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

SUBJECT: Draft Program Environmental Impact Report for the Downtown/Natomas/Airport (DNA) Corridor

Dear Mr. Smith:

Thank you for the opportunity for the California Department of General Services (DGS) to convey comments on the Draft Program Environmental Impact Report (PEIR) for the Downtown/Natomas/Airport Corridor in the City and County of Sacramento.

The DGS is interested in the PEIR because the DGS owns 17.32 acres at 344 North 7th Street, at the intersection of North 7th Street and Richards Boulevard. This site is adjacent to the anticipated first phase of the DNA project (the Project) which would run from downtown Sacramento along 7th Street to Richards Boulevard, and also across the street from one of the 14 light rail stations to be constructed as a part of the overall Project. The California Department of General Services, 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.

ST3-1 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 7th 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. Two assumptions regarding the SPP site have been used in the development of the PEIR. The first, to which the DGS has committed, includes the DGS granting a future easement to allow for North 7th Street to be widened to four lanes, an action that would result in partial demolition of the SPP. The second assumption, on which the DGS has not had any detailed discussions, includes the extension of Bannon Street through the SPP site parallel to Richards Boulevard to North 7th Street.

Letter ST3. Department of General Services

Response to Comment ST3-1

The DNA PEIR assumes that the City will widen North 7th Street consistent with SACOG's Metropolitan Transportation Plan; however, we have remained uncertain as to the actual roadway configuration that could occur. The analysis does include an extension of the existing easterly terminus of Bannon Street that connects with 7th Street. However, alignment options would be determined by the City of Sacramento and could potentially run south of the State Printing Plant. Detailed responses to the commenter's general concerns are provided below in responses to Comments ST3-2 through ST3-5.

FEB-26-2008 11:49 ASSET PLANNING & ENHANCEM 916 3761830 P.03/03

February 25, 2008

ST3-1 As a property owner adjacent to the Project site, the DGS is concerned with the effect the Project's many years of 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.

ST3-2 Construction activities on this first phase of the Project are anticipated to last up to three years, with substantial work planned to the roads in the Richards neighborhood, including utility relocation, which would be the most intensive along North 7th 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 at 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.

ST3-3 The project anticipates supplying a 400-space Park-and-Ride lot for the Richards Boulevard Station. Overflow parking at the Park-and-Ride lot could cause an increased demand on already limited on-street parking in the area, and the potential for illegal parking could occur, including those who might try to illegally park at the State Printing Plant property, if demand greatly exceeds supply.

ST3-4 The traffic coming to and from this new station 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. Additionally, by 2014, should the proposed project be in place, the Richards Boulevard / I-5 southbound ramp intersection would degrade from operating at a Level of Service LOS "C" during the PM peak hour to a LOS "D" during PM peak hour.

ST3-5 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 7th Street and the accompanying Park-and-Ride lot.

Thank you again for the opportunity to comment on the Draft Program Environmental Impact Report. The DGS has a continued commitment to the State Printing Plant site and we hope the information we have shared is useful to you. If you have any questions, about the concerns expressed by the DGS in this letter, please contact me at (916) 376-1805.

Sincerely,

Zachary Miller
Assistant Branch Chief

TOTAL P.03

Response to Comment ST3-2

The DNA PEIR describes a potential three-year construction schedule for the entire project. Figure 4.20-1 shows a two-year construction schedule for the project south of the American River, but the duration of MOS-1 construction is expected to be less than one year. Although general impacts regarding traffic and accessibility are described in the DNA PEIR (see, for example, Chapter 3.0, Transportation and Circulation, and Section 4.2, Land Use), RT encourages the commenter to participate in the upcoming MOS-1 review process. Starting in early summer of 2008, RT will begin more detailed design of the MOS-1 project and project-level environmental analysis. Specific information on access improvements and the construction schedule will be developed to a greater level of detail than described in the DNA PEIR.

Response to Comment ST3-3

At this time, RT has not committed to supplying dedicated Park-and-Ride facilities as part of MOS-1. If provided, a Park-and-Ride lot would be an interim facility to be used until the DNA line is extended across the American River. The full DNA project does not include a Park-and-Ride lot near the Richards Boulevard station. RT's decision to include Park-and-Ride facilities near this interim end-of-line station will be made as part of the next phase for the MOS-1 project, scheduled to begin in early summer, 2008.

Response to Comment ST3-4

The DNA PEIR describes anticipated traffic impacts and potential mitigation measures in Chapter 3.0, using both a near-term (2014) and long-term (2027) planning horizon. Secondary land use consequences relating to traffic impacts are described in Section 3.9 (Parking Impacts) and Section 4.2 (Land Use). These impacts are described in the context of the other (substantial) planned roadway improvements in the area, including the Richards Boulevard interchange modifications.

Response to Comment ST3-5

Safety and security impacts are described in Section 4.10, Public Safety and Security, of the PEIR. In addition, please see responses to Comments I41-4 and ST2-4.

Don Smith - Fwd: DNA Project DEIR

From: "Dana Allen" <DAllen@cityofsacramento.org>
To: <DSmith@sacrt.com>
Date: 2/27/2008 9:14 AM
Subject: Fwd: DNA Project DEIR

Here you go! Not much huh?

>>> Dana Allen 2/26/2008 2:38 PM >>>
Kim
The City of Sacramento's Parks and Recreation Dept would like to submit the following comments on the DEIR for the DNA Project. Other departments within the City have already submitted their comments. So I assume they have covered their respective department's interests.

CI1-1 Page 4.9-8. The City of Sacramento Department of Parks and Recreation operates/maintains the following facilities: South Natomas Community Center, Natomas Baseball Complex, Creekside Oaks Park Site, and the North Natomas Regional Park. Please coordinate with DPR Park Planning and Development Services during the design phase of the tracks and the park and ride stations, access to these facilities during the construction of the tracks and stations, replanting plans, and the long term replacement of recreation property.

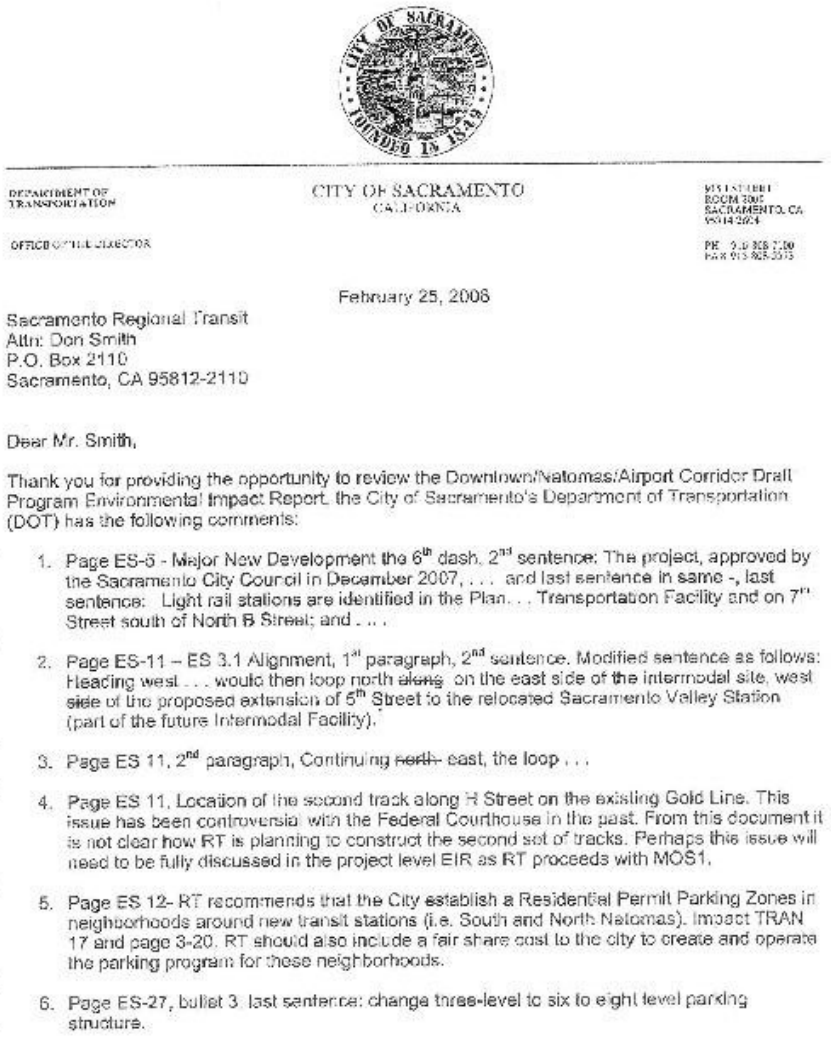
Thank you,

Dana Allen, Senior Planner
City of Sacramento
Department of Parks and Recreation
915 I Street, 5th Floor
Sacramento, CA 95814
(916) 808-2762
f (916) 808-8266

Letter CI1. City of Sacramento, Department of Parks and Recreation

Response to Comment CI1-1

The DNA PEIR describes potential effects on the listed facilities in Section 4.9, Parklands. As each stage of the DNA project (e.g., MOS-1) is advanced to the detailed design phase, RT will conduct extensive outreach with the public and affected agencies such as City Parks. Outreach, as well as the associated environmental review process, will address the issues raised by the commenter and how potential impacts can be mitigated during the design process and during construction.



DEPARTMENT OF TRANSPORTATION

CITY OF SACRAMENTO
CALIFORNIA

915 I STREET
ROOM 3000
SACRAMENTO, CA
95814-2604

OFFICE OF THE DIRECTOR

PH: 916 808 7200
FAX: 916 808 7575

February 25, 2008

Sacramento Regional Transit
Attn: Don Smith
P.O. Box 2110
Sacramento, CA 95812-2110

Dear Mr. Smith,

Thank you for providing the opportunity to review the Downtown/Natomas/Airport Corridor Draft Program Environmental Impact Report. the City of Sacramento's Department of Transportation (DOT) has the following comments:

CI2-1 1. Page ES-5 - Major New Development the 6th dash, 2nd sentence: The project, approved by the Sacramento City Council in December 2007, . . . and last sentence in same -, last sentence: Light rail stations are identified in the Plan. . . Transportation Facility and on 7th Street south of North B Street; and . . .

CI2-2 2. Page ES-11 – ES 3.1 Alignment, 1st paragraph, 2nd sentence. Modified sentence as follows: Heading west . . . would then loop north ~~along~~ on the east side of the intermodal site, west ~~side~~ of the proposed extension of 5th Street to the relocated Sacramento Valley Station (part of the future Intermodal Facility).

CI2-3 3. Page ES 11, 2nd paragraph, Continuing ~~north~~ east, the loop . . .

CI2-4 4. Page ES 11, Location of the second track along R Street on the existing Gold Line. This issue has been controversial with the Federal Courthouse in the past. From this document it is not clear how RT is planning to construct the second set of tracks. Perhaps this issue will need to be fully discussed in the project level EIR as RT proceeds with MOS1.

CI2-5 5. Page ES 12- RT recommends that the City establish a Residential Permit Parking Zones in neighborhoods around new transit stations (i.e. South and North Natomas). Impact TRAN 17 and page 3-20. RT should also include a fair share cost to the city to create and operate the parking program for these neighborhoods.

CI2-6 6. Page ES-27, bullet 3 last sentence: change three-level to six to eight level parking structure.

Letter CI2. City of Sacramento, Department of Transportation

Response to Comment CI2-1

PEIR text (p. ES-5) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-2

PEIR text (p. ES-11) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-3

PEIR text (p. ES-11) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-4

Refer to the responses to Comment letter FE1 from the Federal GSA.

Response to Comment CI2-5

The parking needs and arrangements including park-and-ride facilities, residential permit parking zones around new stations, and cost of operating those programs will be analyzed in future project-level environmental documents.

Response to Comment CI2-6

PEIR text (p. ES-27) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

DNA DEIR
February 25, 2008

CI2-7 7. Pages ES 29 & 30- Table ES6: Impacts Tran-8, 9, 10, 11, 12, 13, 14, 15 does not identify the intersections. Need to correct (pgs. ES29, & 30 and 3-54 through 3-82)

CI2-8 8. Page 1-10, 1st bullet 3rd sentence; Modify as follows: A Light rail stations is are identified . . . adjacent to the proposed Sacramento Intermodal Transportation Facility and on 7th Street adjacent to the residential development and the community facilities development.

CI2-9 9. Page 1-11, 2nd paragraph, 1st sentence: strike ~~adopted plans for construction~~ and " Also in 2004, the City . . . replace with approved a concept design for . . ."

CI2-10 10. Page 2-1, 2.2 Alignment, 1st sentence, modify as follows: The alignment. . . second track, to the north and parallel to the existing Gold Line.

CI2-11 11. Page 2-2, 1st paragraph, 1st sentence: add: and improvements after the word platform, as follows: It should be noted . . . the station platform and improvements, with the City of Sacramento to pay for the remaining construction.

CI2-12 12. Page 2-2, 2nd paragraph, Continuing ~~north~~ east, the loop . . .

CI2-13 13. Page 2-8, Table 2.3-1 #2. Under Station Location, West of 5th Street between G & H Street.

CI2-14 14. Page 2-8, Table 2.3-1, # 8 & 9 - should this not say southwest corner as opposed to southeast corner.

CI2-15 15. Page 2-12, - 2.7 Project Phasing, 3rd paragraph: Description of MOS 1 emergency by-pass is not clear ("the emergency courthouse by-pass described above"), no definition is provided and it needs to be corrected.

CI2-16 16. Page 3-46, paragraph 2, 2nd sentence, ARCO arena located in North (not South) Natomas.

General Comments:

Department of Transportation (DOT) has limited comments based on the assumption that as each phase is closer to implementation a project level EIR will be prepared.

CI2-17 DOT is under the assumption that several design options (7th Street and Truxel for example - mixed flow, median, side) are yet to be decided, subsequent evaluation (project specific EIR) would determine the preferred option. Specific information is not provided such as where the line crosses into exclusive ROW, median, mixed flow, etc. Again, DOT assumes this information will come in subsequent evaluation or covered by some separate document in the future?

CI2-18 DOT will be able to provide more meaningful comments as more details become available. Just as an FYI, Garden Highway widening is in our Transportation Programming Guide (TPG) and the Sacramento Area Council of Government (SACOG's) Metropolitan Transportation Plan (MTP), elevating Northgate is not.

Sincerely,

Jeanne Corcoran
Senior Planner

Response to Comment CI2-7

PEIR text (p. ES-29 and ES-30) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-8

PEIR text (p. 1-10) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-9

PEIR text (p. 1-11) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-10

PEIR text (p. 2-1) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-11

PEIR text (p. 2-2) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-12

PEIR text (p. 2-2) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-13

PEIR text (p. 2-8) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-14

The response is based on the assumption that the commenter meant number 10 instead of number 8 in Table 2.3-1 on page 2-8 of the Draft PEIR. As such, PEIR text (p. 2-8) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-15

The description of the emergency courthouse by-pass referenced as "described above" on page 2-12 of the Draft PEIR is provided in a footnote on a previous page (page 2-2).

> Page 2-12: "This alignment is the same as the emergency courthouse by-pass described above, and would remain in service with full implementation of the DNA project for periods when use of the by-pass is requested by the U.S. District Court."

However, in response to the comment that the definition is not clear, an additional brief description of the emergency courthouse by-pass has been added to the text on page 2-12 (see Chapter 4, Errata, of the Final PEIR).

Response to Comment CI2-16

PEIR text (p. 3-46) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CI2-17

Project-level engineering and environmental review will be conducted for each phase of the DNA project. Specific information, such as ROW, median, mixed flow, etc, will be determined at that time. The City of Sacramento, Department of Transportation is correct to assume they will have a future opportunity to comment on specific project-level engineering.

Response to Comment CI2-18

Elevating Northgate Boulevard is not listed in Appendix E, Project List, of SACOG's 2006 Metropolitan Transportation Plan (MTP) for 2027. As such, PEIR text [p. 3-51 and 5-19 (Figure 5.4-2)] has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

PLANNING DEPARTMENT

CITY OF SACRAMENTO
CALIFORNIA

NEW CITY HALL
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DIVISION OF LONG-RANGE PLANNING

916-808-8368
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February 25, 2008

Don Smith, Senior Planner
Sacramento Regional Transit District
P.O. Box 2110
Sacramento, CA 95812-2110
Fax: 916-442-2893

Subject: Draft Program Environmental Impact Report (PEIR) for the Downtown/Natomas/Airport Corridor

Dear Mr. Smith:

City of Sacramento, Planning Department, Division of Long-Range Planning has reviewed the PEIR for the Downtown/ Natomas/Airport Corridor. This letter sets forth our comments on the PEIR.

CI3-1 **1. Bridge over the American River**

The PEIR mentions a bridge crossing over the American River (pgs 2-2, 4.4-13), specifically indicating that the bridge will include bicycle, pedestrian and transit facilities. However, it makes no mention of whether the bridge will include lanes for automobile traffic. We request that the PEIR state RT's position, either for, against, or neutral, on the inclusion of automobile traffic on this bridge.

CI3-2 **2. Population and Employment Projections**

In the introduction, the PEIR partially justifies the need for the DNA Corridor by citing the high projected population growth both in the newly developing areas of North and South Natomas and throughout the City and County of Sacramento. "Because the area is being urbanized beyond projections, it provides the opportunity to incorporate transit into on-going land development plans to reduce the dependency on conventional single-occupant auto travel" (pg. 1-9).

However, the population projections used in the PEIR understate their case, as they are below the projections resulting from the 2030 General Plan. As part of the General Plan, a Preferred Land Use Diagram has been created with the goals of channelling housing and employment growth into identified "Opportunity Areas" within the city and minimizing the amount of "greenfield" growth outside the current

Letter CI3. City of Sacramento, Division of Long-Range Planning

Response to Comment CI3-1

The Locally Preferred Alternative for the DNA alignment adopted by the Regional Transit Board in December 2003, only includes a transit bridge and facilities for pedestrians and bicycles (the latter would be constructed/funded by others). Any further consideration for an automobile bridge would need to be included in other future environmental analysis.

Response to Comment CI3-2

While using the City of Sacramento General Plan development forecast could potentially strengthen the case for the DNA project, the land use forecasts used were based on SACOG's 2006 Metropolitan Transportation Plan (MTP) for 2027 for purposes of keeping the Draft PEIR analysis consistent with a separate Federal process.

city limits. By designating higher densities of housing and employment in urban infill areas, the city has projected higher rates of growth than would have been possible without the General Plan.

The population projections made in the PEIR differ from the projections of the 2030 General Plan in the following respects:

- Citywide, the PEIR projects that the total dwelling units in 2027 will be 240,034, with 418,251 jobs in the city (pg. 1-9). The 2030 General Plan projects 264,493 dwelling units and 442,697 jobs.
- In North and South Natomas, the PEIR projects that the population will rise from 70,300 in 2005 to 113,000 in 2027 (pg. 1-6). While the 2030 General Plan has a slightly lower 2005 projection of 66,332, it projects a much higher increase to 120,378 by 2027.

We believe that these population, housing, and employment projections would strengthen the case for investments in light rail in the DNA corridor and should be incorporated into the final EIR.

CI3-2

If you have any questions, please call me at your convenience at (916) 808-5894.

Sincerely,

Robert Cunningham
Assistant Planner

CC: Carol Shearly, Planning Director
Tom Pace, Long Range Planning Manager
Jim McDonald, Senior Planner
Tom Buford, Senior Planner

Letter CO1. County of Sacramento, Department of Transportation

Municipal Services Agency

Department of Transportation
Tom Zlotkowski, Director

Terry Schutten, County Executive
Paul J. Hahn, Agency Administrator

County of Sacramento

JAN 10 2008

January 8, 2008

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

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE DOWNTOWN/NATOMAS/AIRPORT CORRIDOR

Dear Mr. Smith:

The Sacramento County Department of Transportation has received the Draft Environmental Impact Report for this project and appreciates the opportunity to review this document. We have the following comments:

CO1-1 • Be sure to continue to coordinate alignment and station locations in the unincorporated County with both the Metro Air Park development and the Airport Master Plan.

CO1-2 • Table 6 in the Executive Summary Section identifies intersections impacts and mitigation measures but it is not clear which intersections are being identified. Please clarify.

CO1-3 As this project proceeds, please continue to include the Sacramento County Department of Transportation in any future technical advisory committee meetings. We appreciate the opportunity to participate in this process.

Sincerely,

Matthew Darrow
Senior Transportation Engineer
Department of Transportation

MGD:mgd

c: Dan Shoeman, DOT
Dean Blank, DOT
Jaskamal Singh, DOT

"Leading the Way to Greater Mobility"

SACDOT

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Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-5123 . Fax: 916-875-5363
www.sacdot.com

Response to Comment CO1-1

Comment noted. RT will continue to coordinate alignment and station locations in the unincorporated County with both the Metro Air Park development and Airport Master Plan.

Response to Comment CO1-2

PEIR text (Table ES-6) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO1-3

Comment noted. RT will continue to include the Sacramento County Department of Transportation in future technical advisory committee meetings.

County Executive
Terry Schutten

Sacramento County
Airport System
G. Hardy Acree, Director of Airports

County of Sacramento

Sacramento International Airport
Mather Airport
Executive Airport
Franklin Field

February 5, 2008

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

Subject: Comments on Downtown /Natomas/Airport Corridor Draft Environmental Impact Report – December 2007

Dear Mr. Smith:

This letter conveys the comments of the Sacramento County Airport System (SCAS) in response to the Draft EIR issued by your office on December 28, 2007. For ease of understanding and reference, we've noted the page number and cut and pasted the excerpt on which we are providing comment.

* On Page ES-12 and Page 2-7, the alignment is discussed from Del Paso road all the way through Metro Air Park and onto Airport Property. The final sentence notes:

"...After crossing under Aviation Boulevard, the alignment would shift to line up with the central axis of the new terminal building proposed by the Airport to be built south of the existing parking lot between Terminals A and B. The end-of-line station is proposed to be incorporated into this new building.

CO4-1

Comment: It has yet to be determined where the exact terminus of the line will be. The exact location is dependent upon the actual completion date of the DNA to Airport, future expansion of the terminal, and security limitations. Options will be presented at the end of the Preliminary Engineering study currently underway between RT and SCAS and will either include an "into building" option or possibly stations located adjacent to the building or immediately south of the building with a short connecting "breezeway" (less than 500'). SCAS is committed to having excellent light rail service at Sacramento International Airport with a seamless transition to the terminal as close as possible given security limitations and options for future expansion of the terminal.

* Page 3-17, 3-42, and 3-43 discuss Ground Access and Ridership Estimates and includes the following:

In order to develop an airport passenger ground access model, a detailed survey of airpassengers was made. In January 2002, a total of 785 departing passengers were surveyed. The sample of passengers was drawn from a representative sample of departing

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www.saccounty.net • www.sacairports.org

Letter CO4. Sacramento County Airport System

Response to Comment CO4-1

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of the terminus at the Airport. These assumptions will be revisited as the project moves into more detailed engineering and environmental studies. At that time, RT will coordinate with SCAS to ensure a seamless transition to the terminal as close as possible given security limitations and to accommodate the future expansion needs of the Airport. RT acknowledges that a greater level of effort is required because of SCAS's Terminal Modernization Project and RT appreciates the support given by SCAS to the Preliminary Engineering study currently underway between the two agencies. This coordination and the resulting decisions will be summarized in future project-level environmental documents.

flights at all commercial Airport terminals (Terminals A and B and the commuter terminal) after screening to ensure that the sampled passengers traveled to the Airport from a location in the RT service area.

CO4-2

Comment: Our Preliminary Engineering Agreement with RT includes the following two references to other Airports and discusses transit ridership:

> **Task 2.2: Assemble Airport LRT Peer Review Group**
>
> Airport LRT extensions have been built in numerous U.S. cities. The most relevant and current being in the Bay Area, Portland, St. Louis, and Baltimore. Each one has had its unique challenges and offer different lessons learned in terms of planning, design, construction, operations, and cost allocations of the transit system and related facilities. The purpose of this task is to enable RT and the County Airport System, at the start of the alignment definition stage, to draw upon the experiences from these properties and incorporate ideas into the total project development.

> **Task 2.4: Transit Ridership**
>
> LRT service to SMF will provide an alternative mode of transportation for air passengers and airport employees. In order to assess the impact that LRT service will have on transit facilities and parking demand on airport property, transit ridership data that was developed for the DNA Corridor Study will be used in the ACD effort. RT will quantify riders by trip purpose as well as identify how many projected riders are airport employees and how many will be airline passengers, using transit ridership data from the DNA Corridor Study.

In addition to the on-Airport surveys conducted in January 2002, SCAS would like RT to consider the relevant projects and the ridership being experienced on these systems at other Airports to better estimate the potential use of light rail as mode of transportation for Sacramento International Airport Passengers and Employees.

* Page 4.10-4, includes the following:

The presence of light rail is not anticipated to have safety or security impacts at the Sacramento International Airport …

…No impacts are anticipated at the terminal area because the station will be located over 300 feet from the terminal location. This is consistent with Federal Aviation Administration requirements that parked vehicles be a minimum of 300 feet away from terminal operations.

CO4-3

Comment: As noted above, it has yet to be determined where the exact terminus of the line will be. The precise location of the station is dependent upon the actual completion date of the DNA to Airport, future expansion of the terminal, and security limitations. Options will be presented at the end of the Preliminary Engineering study currently underway between RT and SCAS that will allow RT to proceed with its EIR and Airports to proceed with its Terminal Modernization Program. During Final Engineering of the light rail line, SCAS and RT will need to meet with TSA and work to determine the exact location of the

Response to Comment CO4-2

As part of the next phase of the DNA project, RT is preparing a Transition Study that will include a re-evaluation of ridership forecasts and other cost-benefit metrics relating to the full build-out of the DNA project, including an update to the 2002 Airport passenger survey. At that time, RT will consider including relevant projects and the ridership being experienced on these systems at other airports to better estimate the potential use of light rail of a mode of transportation for Sacramento International Airport passengers and employees.

Response to Comment CO4-3

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of the terminus at the Airport. These assumptions will be revisited as the project moves into more detailed engineering and environmental studies. At that time, RT will coordinate with SCAS to ensure a seamless transition to the terminal as close as possible given security limitations and to accommodate the future expansion needs of the Airport. RT acknowledges that a greater level of effort is required because of SCAS's Terminal Modernization Project and RT appreciates the support given by SCAS to the Preliminary Engineering study currently underway between the two agencies. This coordination and the resulting decisions will be summarized in future project-level environmental documents. Safety and security will be an important consideration during future project-level engineering and environmental review of subsequent stages of the project, as has been the case during the current Preliminary Engineering study associated with the Terminal Modernization Project.

station and how it and its operations can work within the Airports expansion plans and the TSA security regulations that are in place at that time.

CO4-3

Page 4.20-6 Staging Areas notes the following:

Beyond the ARCO Arena, two additional sites have been identified for staging: the Metro Air Park maintenance facility site, and the Airport, at the area south of Crossfield Drive at the location of the old detention lagoons that have now been filled. The Airport site is designated in the Proposed Airport Master Plan Improvements (Long-Term) as commercial and where a future optional station could be constructed when development occurs. These sites would be occupied for 30 months of the 36-month construction period for the DNA project in this area.

Comment: The "detention lagoons" are still in use and have not "now been filled". Further, the exact location of the staging area for construction of the Light Rail line on Airport will need to be determined a few months prior to actual construction. The Airport cannot commit to designating this site for a staging area until firm dates for construction are established and SCAS has the opportunity to review this site as a potential staging area consistent with other uses, projects, etc.

CO4-4

Page 4.22-3 notes the following:

***Sacramento International Airport**. An update to the Airport's Master Plan is currently underway. It is expected that medium-term construction projects in the vicinity of planned DNA improvements would likely include expansion of airport terminals, although several other small-scale facility improvements are also likely (Febbo, 2002).*

Comment: This statement was correct at the time. Subsequently, the Airport Master Plan project description was completed and approved by the Board of Supervisors in 2004. The Environmental Impact Report to satisfy CEQA was completed and approved by the Board of Supervisors in 2007. A federal Environmental Assessment to satisfy NEPA is anticipated to be complete in March 2008. SCAS has proceeded with a more detailed Terminal Modernization Program to replace existing Terminal B. SCAS is working closely with RT staff on Preliminary Engineering of the on-Airport portion of the light rail line so that is consistent with the design criteria of the new terminal.

CO4-5

The following pages; Appendix 5-11, 5-23 (Figure 5.4-5 Alternative 3: Truxel LRT Alignment), Appendix 5-25, Appendix 5-29, Appendix 5-31, Page 5-34, Appendix 5-36, Appendix 5-40, and Appendix 5-45 depict a preferred option that places the light rail station on the far eastern extreme of the terminal envelope (east of existing Terminal A).

Comment: The SCAS and RT have proceeded with Preliminary Engineering for the on-Airport portion of the DNA line. Attached to this comment letter are the three remaining options for the on-Airport Light Rail Alignment. These figures include an LPA, RT-2, and RT-4. SCAS requests that these exhibits be incorporated in the Final EIR and that references and exhibits that depict the station placement to the eastern extreme of the terminal envelope (east of Terminal A) be eliminated. RT's Engineering Department has CADD files and

CO4-6

Response to Comment CO4-4

Construction staging areas will be determined during future project-level engineering and environmental review, at which time the SCAS will have the opportunity to review the proposed staging area at the Airport. PEIR text (p. 4.20-6) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO4-5

Comment noted. RT appreciates SCAS cooperation on Preliminary Engineering of the on-Airport portion of the DNA project alignment. PEIR text (p. 4.22-3) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO4-6

Comment noted. The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of future stations, including the project's terminus at the Airport. These assumptions will be revisited during future project-level design and engineering. Because this is a program-level environmental review, RT believes that the conceptual alignment presented in the PEIR is sufficient to adequately characterize impacts to the environment at a level appropriate for a programmatic analysis. Therefore, it is not necessary to amend the program-level EIR to reflect the exact configuration of the DNA project terminus at the Airport, which at this time remains undetermined.

CO4-6 PDF exhibits for these three options that are being developed in the SCAS/RT on-Airport Preliminary Engineering study.

Thank you for the opportunity comment on the Draft Program EIR. Questions may be directed to me at the telephone number and e-mail address listed below.

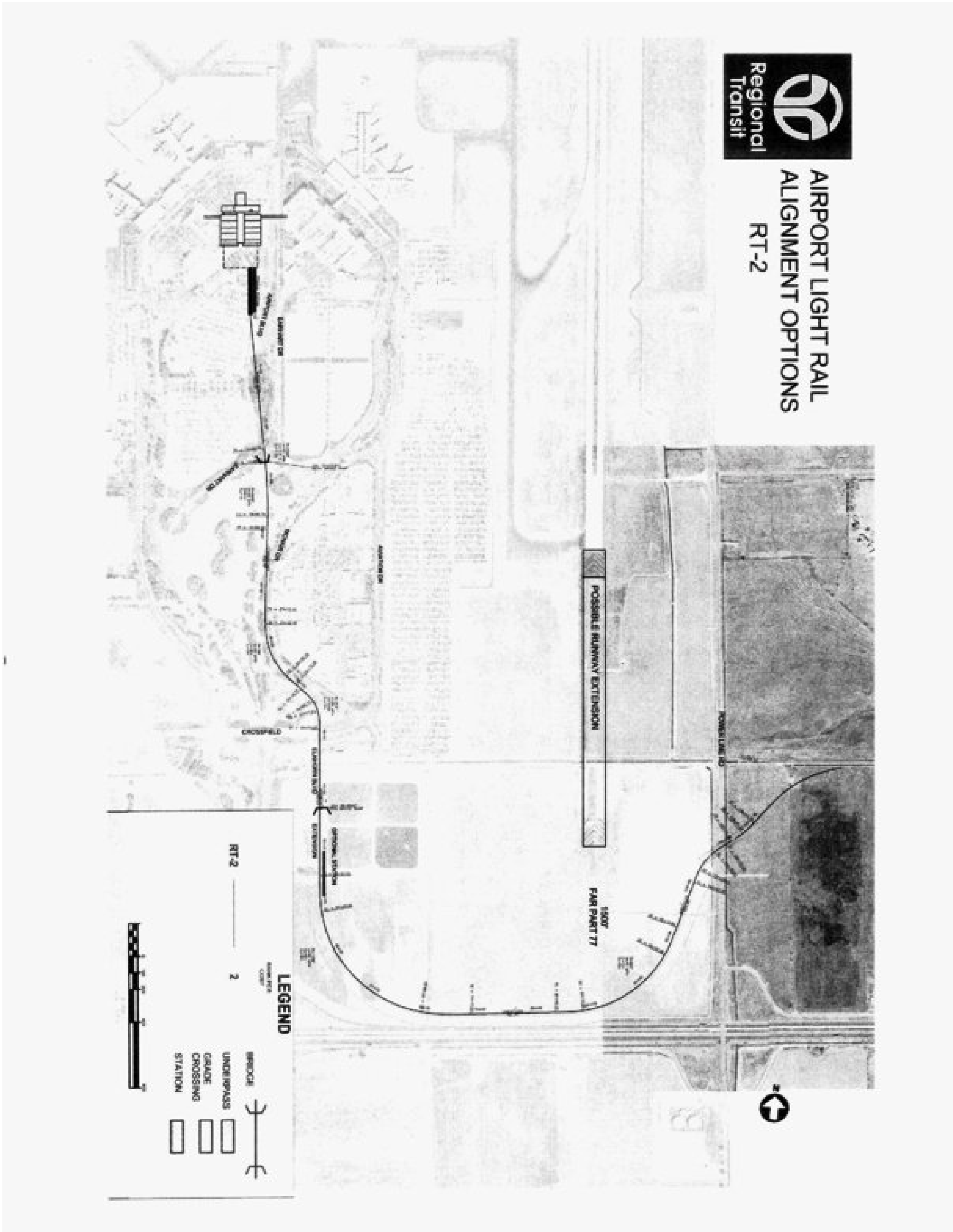
Sincerely,

John Febbo
Senior Airport Planner
916-874-0775
febboj@saccounty.net

Attachments:

1) Airport Light Rail Alignment Options LPA
2) Airport Light Rail Alignment Options RT-2
3) Airport Light Rail Alignment Options RT-4

cc: Lisa J. Stanton, Acting Airport Chief Administrative Officer
Leonard Takayama, Deputy Director of Special Projects
Glen Rickelton, Airport Manager, Planning, Environmental, and Noise
Greg Rowe, Senior Environmental Analyst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AIRPORT LIGHT RAIL
ALIGNMENT OPTIONS
RT-2
POSSIBLE RUNWAY EXTENSION
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UNDERPASS
GRADE CROSSING
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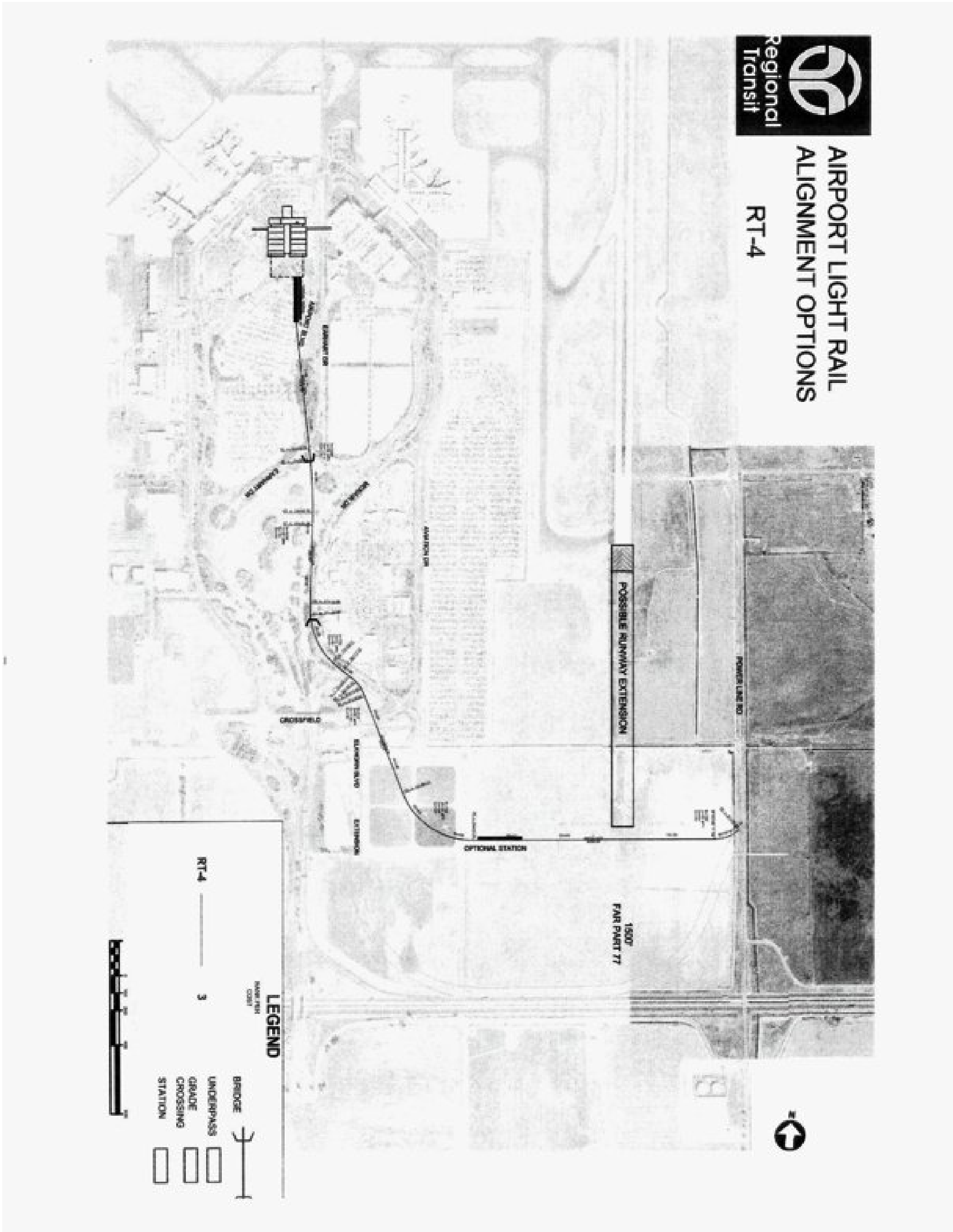
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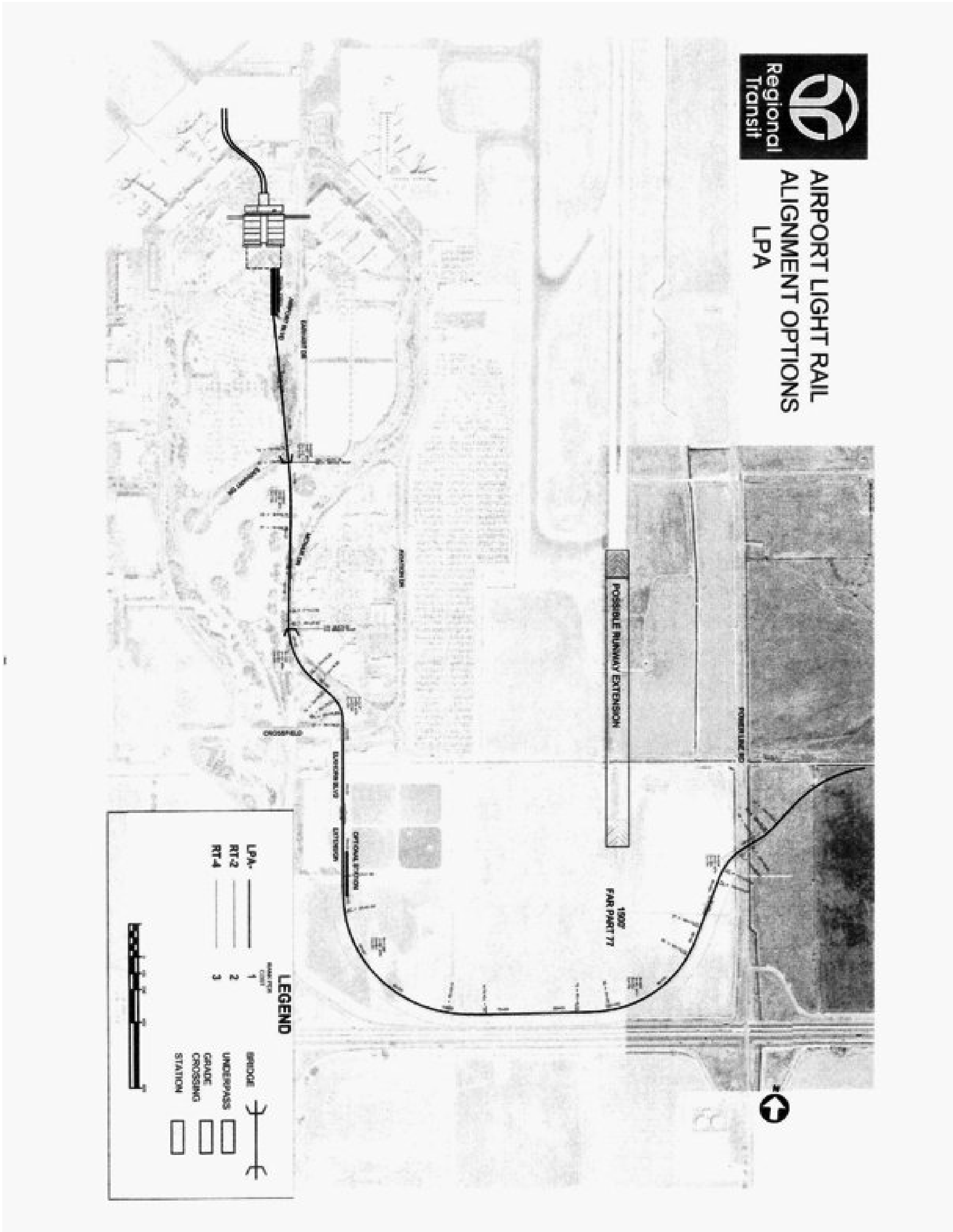
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UNDERPASS
GRADE CROSSING
STATION

Municipal Services Agency

Department of Regional Parks
Gary Kukkola, Director

Terry Schutten, County Executive
Paul J. Hahn, Agency Administrator

County of Sacramento

February 21, 2008

FEB 25 2008

Sacramento Regional Transit District
Attn. Don Smith, Senior Planner
PO Box 2110
Sacramento, California 95812-2110

Subject: Comments on RT DNA PEIR

Dear Mr. Smith:

Thank you for the opportunity to review RT's Downtown/Natomas/Airport Corridor Program Environmental Impact Report (PEIR). Regional Parks supports the extension of public transit to serve all of the County's citizens. The DNA crossing of the American River will, however, have impacts on the American River Parkway that must be avoided or mitigated to the extent possible through the EIR process and through ongoing project coordination between RT, the County, and other stakeholders.

CO5-1

Our understanding is that the Program EIR is being used to generally address the overall DNA project. The first phase to be constructed is south of Richards Boulevard. Detailed environmental analysis and subsequent California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents will be prepared for each phase as it progresses. Regional Parks is most interested in the phase that will cross the American River Parkway, which is not sufficiently well defined to be analyzed at a project level of detail at this time. The comments in this letter are focused on the program's impacts with the assumption that we will have a later opportunity to comment on a future document fully disclosing the impacts of a Parkway crossing.

Regional Parks requests that the Program EIR and subsequent environmental documents fully assess and mitigate any incompatibilities with both the adopted 1985 American River Parkway Plan (ARPP) and the proposed 2006 ARPP, as well as assessing and mitigating the physical impacts of the project on the Parkway and its users. We believe project impacts can be mitigated more fully than is proposed in the Draft PEIR. Purchasing land within the American River Parkway would be an appropriate mitigation for any residual impacts that cannot be mitigated at the site of the crossing.

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Letter CO5. County of Sacramento, Department of Regional Parks

Response to Comment CO5-1

The commenter is correct in that the PEIR is being used to generally address the overall DNA project, and that Sacramento County Regional Parks will have a later opportunity to comment on a future document fully disclosing the impacts of a Parkway crossing. Specific responses to Sacramento County Regional Parks' general comments are provided below.

Specific comments on the PEIR are listed below.

CO5-2
- Throughout the document, please refer to our department as "Sacramento County Regional Parks."

CO5-3
- Page 4.2-5 paragraph 2 lists the land uses between the levees of the American River and should include the American River Parkway.

CO5-4
- Page 4.2-15 quotes a policy from the proposed 2006 ARPP but does not specifically address the DNA program's compatibility with the currently adopted 1985 ARPP. The current ARPP policy 7.11 indicates that expanding existing bridges is preferred to building new bridges in the Parkway, but that new bridges "shall be designed and located in such a manner as to result in the least impact to the parkway environment." Policy 5.7 provides specific means to reduce the adverse visual intrusion of new structures in the Parkway. The DNA program should be prepared to demonstrate consistency with these policies until such time as the updated ARPP is adopted.

CO5-5
- Policy 3.1 in the 2006 ARPP refers to the need to minimize impacts of developing new facilities and mitigating those impacts that remain. Policy 7.22 addresses means to minimize visual impacts of structures. Policies 8.18 and 8.19 address bridge crossings specifically and acknowledge the proposed crossing location. Policy 10.4 discusses the DNA project in the context of the Discovery Park Area Plan.

CO5-6
- Page 4.9-4 Site No. 44 is 4,600 acres in total (not 426 acres). Site No. 48 is a County facility that is used for interpretive farm programs.

CO5-7
- Page 4.9-12 (1st paragraph under "DNA Project Impacts") states that no constructive use impacts will occur. However, in the immediate vicinity of the American River Parkway crossing, the project will have constructive use impacts (e.g. will reduce the usability of the park for recreation) due to noise and visual impacts. The Federal Highway Administration (FHWA) Section 4(f) guidelines (23 CFR 771.135) deferred to by the Federal Transit Administration indicate that constructive use occurs when a noise increase interferes with "enjoyment of an urban park where serenity and quiet are significant attributes."

CO5-8
- Page 4.9-13 (Operational Impacts, PARK-2)—Despite the statement that all of the area (exclusive of piers and abutments) underlying the bridge would be available for public use, constructively this area is lost to recreation as the natural values that attract visitors to the park will not be available under the bridge.

CO5-9
- Page 4.10-3 lists protection of transit patrons as a significance criterion for public safety impacts. This should be broadened to include all members of the public, including American River Parkway visitors.

CO5-10
- Page 4.11-16 notes that visual impacts of grade separations, including the bridge over the American River Parkway, will remain significant after the implementation of the proposed mitigation measures. These impacts could be further reduced by purchasing and improving nearby land to incorporate into the Parkway. Properly done, this could achieve the objectives of the Department of Transportation Act

Response to Comment CO5-2

Comment noted. PEIR text throughout the document has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-3

PEIR text (p. 4.2-5, paragraph two) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-4

The analysis of land use impacts in Section 4.2 and the analysis of parkland impacts in Section 4.9 make a specific determination of consistency with the draft 2006 American River Parkway Plan. Impact LU-1 in the DNA PEIR states that the DNA project is compatible with the Sacramento County General Plan, which incorporates the 1985 American River Parkway Plan, but the commenter is correct in that the determination of consistency with the existing ARPP is not described on a policy-by-policy basis. The analysis of consistency with the policies identified by the commenter is provided below.

With regard to Policy 7.11, RT examined the alternative of constructing a new transit crossing both upstream and downstream of the existing I-5 river crossing. The preferred option (upstream) was carried forward for detailed consideration in the PEIR. The upstream transit crossing would be physically separated from the existing bridge because of Caltrans' plans to widen I-5 to accommodate HOV lanes. Impacts of the upstream

crossing are summarized in Table 5.4-8, and include impacts to parklands, biological resources, and visual resources. RT has determined that the level of impacts between the I-5 and Truxel river crossings is generally comparable, but that the Truxel crossing has greater transit benefits (primarily because of reduced travel time). While acknowledging that Policy 7.11 prefers the use of existing transit crossings, the analysis in the PEIR effectively demonstrates that the DNA project is not inconsistent with the policy.

With regard to Policy 5.7, the specific means to reduce adverse visual effects will be addressed in the subsequent project-level design and environmental review process. RT expects that the specific requirements in Policy 5.7 (e.g., materials and colors) would be addressed during the design workshops required by Mitigation Measure MPARK-1. To enhance consistency, the specific language of Policy 5.7 has been added to MPARK-1, beginning on page 4.9-14 of the PEIR. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-5

The PEIR's general acknowledgement of ARPP consistency is based on the draft 2006 ARPP. Additional information regarding consistency with the 1985 ARPP is described in the above response. During the planning process, RT followed the development of the 2006 ARPP. RT believes that the DNA project is consistent with Policy 3.1 and Policy 7.22; minimizing and mitigating impacts will be formally considered during the detailed design and environmental review phase consistent with the feasible mitigation options described in Mitigation Measures MPARK-1 and MPARK-2. The DNA project is consistent with Policies 8.18, 8.19, and 10.4.

Response to Comment CO5-6

PEIR text (p. 4.9-4) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-7

As the commenter states, constructive use is defined in the federal regulations at 23 CRF 771.135. Subsection (p)(1)(iii) describes constructive use as occurring when "…the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify the resource for protection under section 4(f) are substantially impaired." RT believes that no constructive use will occur because the project's impacts would not result in a substantial impairment. The commenter quotes a portion of the "constructive use" definitions; however, a separate subsection states that a constructive use does not occur when the projected operational noise levels of a transit project do not exceed the applicable FTA noise criteria (Subsection (p)(5)(ii)). As described in Section 4.13 (Noise and Vibration), noise levels at the Parkway crossing are expected to be within FTA noise criteria with the implementation of Mitigation Measure MNOI-1.

Resolution of this issue is the responsibility of FTA when federal action is taken. At this time, no federal action is anticipated and therefore FTA cannot make a determination under Section 4(f). Federal action is anticipated at the time the American River bridge crossing is advanced to the detailed design and environmental review phase of that segment of the DNA project. At that time, RT expects that the greater level of design information will allow a much more accurate characterization of construction and operational impacts, including

more detailed noise analysis. It is possible that, based on that more detailed analysis, FTA could make a determination that constructive use impacts will occur, and that additional mitigation is required to meet Section 4(f) requirements. Although that determination is several years away, RT is committed to continuing its ongoing discussions with Regional Parks and other stakeholders regarding potential impacts and mitigation options.

Response to Comment CO5-8

Please refer to response to Comment CO5-7.

Response to Comment CO5-9

PEIR text (p. 4.10-3) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-10

RT agrees that purchase and enhancement of nearby land is a feasible option to mitigate visual and other indirect impacts (and direct impacts) of the DNA project. RT is in the process of examining this option with Sacramento County Regional Parks staff and other stakeholders. The specific and final determination of consistency with Section 4(f) will be made by FTA during the subsequent project-level evaluation of the river crossing (assuming federal participation in that phase of the project).

CO5-10

Section 4(f), which requires RT to "minimize harm" to the Parkway. Replacement of land of comparable value and function is an appropriate mitigation approach under 4(f) according to the 2005 FHWA Section 4(f) Policy Paper.

CO5-11

- Page 4.14-9 refers to "A permanent maintenance right-of-way under the guideway [that] would be kept free of vegetation." This description differs from that in Chapter 4.9. Pages 4.9-12 and 4.9-13 indicate that every area except the bridge piers would remain open for recreation. The third paragraph under "operational impacts" on page 4.9-13 refers to the "possible loss" of vegetation by shading. It should add that this is in addition to the certain loss of vegetation that is deliberately removed or suppressed under the guideway.

CO5-12

- Page 4.14-10 indicates that one or more cofferdams will be constructed in the American River Parkway. The general size, timing, operation, dewatering methods, and decommissioning of these structures should be more fully described, either in this section or in a construction methods section of the project description, in order to allow the reader to better understand the nature of the impacts associated with these structures.

CO5-13

- Page 4.19-2 first sentence of the last paragraph describes a floodplain terrace "outside the American River Parkway." This should be corrected to say within the Parkway.

CO5-14

- Section 4.21 should identify the 4(f) and 6(f) approval processes as they relate to construction of the American River Parkway crossing.

CO5-15

- In chapter 5 it is not clear how the impacts of the alternatives differ from those of the proposed project, nor is an overall environmentally superior alternative identified as is required by Section 15126.6(e)(2) of the CEQA Guidelines. The introduction to the EIR identifies as a project objective to "provide environmental benefits in the corridor" in the context of air quality improvements assumed to occur with improved transit availability. The alternatives analysis should compare air quality and other impacts of all alternatives to indicate to what degree they meet this objective. There is much discussion of alternatives considered and rejected, and it is assumed that the remaining alternatives provide a reasonable range as required by CEQA.

CO5-16

- Appendix B contains letters from County Parks and the County Parks Commission requesting the analysis and mitigation of the impacts of illegal encampment under the new Parkway crossing and of increased, unmonitored access and use of the Parkway. It is not clear if or where this was addressed in the PEIR.

Response to Comment CO5-11

The commenter correctly notes an inconsistency between Section 4.9 (Parklands) and Section 4.14 (Biological Resources). Section 4.9 is correct - vegetation will be reestablished under the bridge following construction. RT expects that all existing vegetation will be removed during construction, and that additional impacts from shading are likely to occur. Revegetation under the bridge will take place consistent with RT's maintenance needs, with specific procedures to be established during the design phase in consultation with Regional Parks and other stakeholders. Mitigation for vegetation impacts will occur consistent with Mitigation Measures MPARK-2 and MBIO-1. PEIR text (p. 4.14-9) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-12

The general size, timing, operation, dewatering methods, and decommissioning of the cofferdams is not known at this time, but will be described in future, project-level environmental review. Future project-level design and engineering will provide an opportunity to further evaluate and refine the mitigation measures for the cofferdams.

Response to Comment CO5-13

PEIR text (p. 4.19-2) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Thank you again for this opportunity to comment. Regional Parks will continue to work with RT to ensure that the impacts of this important project to the American River Parkway are avoided.

Sincerely,

Gary Kukkola
Director

4

Response to Comment CO5-14

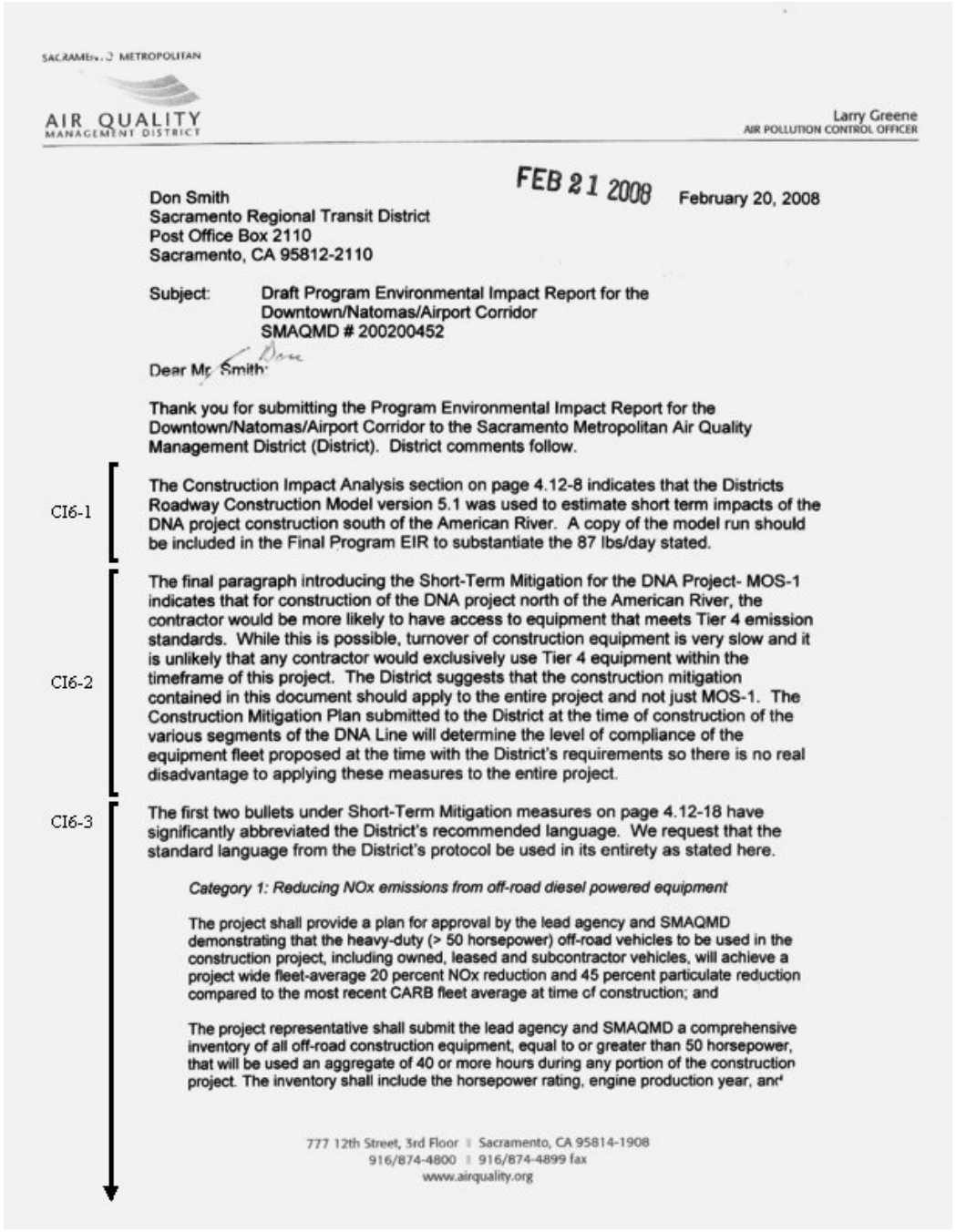
PEIR text (Table 4.21-1, p. 4.21-4) in Section 4.21 has been modified as recommended to include the 4(f) and 6(f) approval processes. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-15

The PEIR contains a statement (p. 5-34) identifying the environmentally superior alternative pursuant to Section 15126.6(e)(2). RT decided to postpone this statement until publication of the Final PEIR, which is allowed under CEQA. The PEIR contains a table that compares the alternatives to the Proposed Action (Table 5.5-1, p. 5-35). Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO5-16

The DNA PEIR includes a mitigation measure (MPARK-1) that describes a process to consider multiple issues related to bridge design, construction, and mitigation. It is RT's expectation that questions regarding illegal encampment under the proposed bridge will be addressed during implementation of MPARK-1. As a result of this comment/response process, Mitigation Measure MPARK-1 has been updated to be more specific (see Response to Comment CO5-4 above). Additional language has been added to MPARK-1, beginning on page 4.9-14 of the PEIR, to ensure that the issue of illegal encampments has been addressed. Refer to Chapter 4, Errata, of the Final PEIR.



SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

Larry Greene
AIR POLLUTION CONTROL OFFICER

FEB 21 2008

February 20, 2008

Don Smith
Sacramento Regional Transit District
Post Office Box 2110
Sacramento, CA 95812-2110

Subject: Draft Program Environmental Impact Report for the Downtown/Natomas/Airport Corridor
SMAQMD # 200200452

Dear Mr. Smith:

Thank you for submitting the Program Environmental Impact Report for the Downtown/Natomas/Airport Corridor to the Sacramento Metropolitan Air Quality Management District (District). District comments follow.

CI6-1 The Construction Impact Analysis section on page 4.12-8 indicates that the Districts Roadway Construction Model version 5.1 was used to estimate short term impacts of the DNA project construction south of the American River. A copy of the model run should be included in the Final Program EIR to substantiate the 87 lbs/day stated.

CI6-2 The final paragraph introducing the Short-Term Mitigation for the DNA Project- MOS-1 indicates that for construction of the DNA project north of the American River, the contractor would be more likely to have access to equipment that meets Tier 4 emission standards. While this is possible, turnover of construction equipment is very slow and it is unlikely that any contractor would exclusively use Tier 4 equipment within the timeframe of this project. The District suggests that the construction mitigation contained in this document should apply to the entire project and not just MOS-1. The Construction Mitigation Plan submitted to the District at the time of construction of the various segments of the DNA Line will determine the level of compliance of the equipment fleet proposed at the time with the District's requirements so there is no real disadvantage to applying these measures to the entire project.

CI6-3 The first two bullets under Short-Term Mitigation measures on page 4.12-18 have significantly abbreviated the District's recommended language. We request that the standard language from the District's protocol be used in its entirety as stated here.

Category 1: Reducing NOx emissions from off-road diesel powered equipment

The project shall provide a plan for approval by the lead agency and SMAQMD demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent CARB fleet average at time of construction; and

The project representative shall submit the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and

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www.airquality.org

Letter CO6. Sacramento Metropolitan Air Quality Management District

Response to Comment CO6-1

As recommended, a copy of the Roadway Construction Model (version 5.1) run, substantiating the maximum estimated NOX emissions (87 lbs/day) short-term construction impact presented on page 4.12-8 of the PEIR, has been included in the Final Program EIR (Appendix F). Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO6-2

PEIR text (p. 4.12-17 and 4.12-18) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO6-3

PEIR text (p. 4.12-18) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

projected hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

and:

Category 2: Controlling visible emissions from off-road diesel powered equipment

The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and [DERA, City of x, SMAQMD, etc.] shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other SMAQMD or state rules or regulations. CI6-3

Mitigation measure 1 under "Equipment" on page 4.12-19 requires the use of ultra-low sulfur fuel. Since June 2006, only ultra-low sulfur diesel fuel can be sold in California. This makes this mitigation measure, as well as a portion of mitigation measure 1 under "Administrative", superfluous and we recommend removal. CI6-4

The Special Mitigation Regarding the Use of Diesel Equipment on page 4.20-14 is not totally consistent with the Short-Term Mitigation (Construction) beginning on page 4.12-18 and continuing on page 4.12-19. The former contains a mitigation measure pertaining to particulate filters while the later does not. If there is a need to repeat these mitigation measures, they should be consistent. Additionally, the particulate filter mitigation measure should be revised to read: CI6-5

> 2. Level 3 Diesel Particulate Filters will be used on all off-road diesel equipment for which the ARB has verified specific control technology. For a listing of ARB verified control technologies, please see http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact me at 916.874.4882 or RMaertz@airquality.org .

Sincerely,

Ron Maertz
Land Use / Mobile Source Division

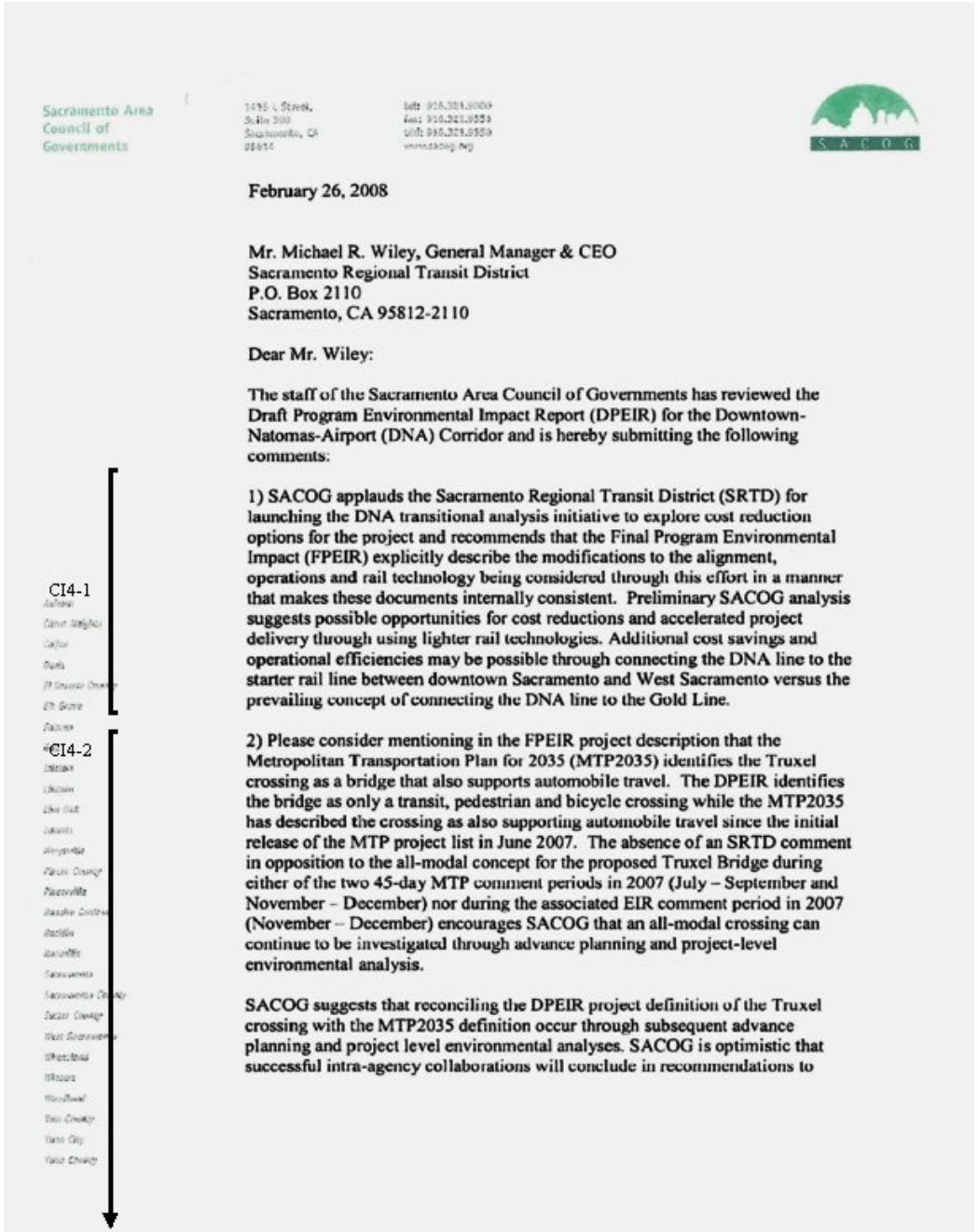
C: Larry Robinson, SMAQMD

Response to Comment CO6-4

PEIR text (p. 4.12-19) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment CO6-5

PEIR text (p. 4.12-19 and 4.20-14) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.



Sacramento Area Council of Governments

1415 L Street, Suite 300 Sacramento, CA 95814

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SACOG

February 26, 2008

Mr. Michael R. Wiley, General Manager & CEO
Sacramento Regional Transit District
P.O. Box 2110
Sacramento, CA 95812-2110

Dear Mr. Wiley:

The staff of the Sacramento Area Council of Governments has reviewed the Draft Program Environmental Impact Report (DPEIR) for the Downtown-Natomas-Airport (DNA) Corridor and is hereby submitting the following comments:

CI4-1

1) SACOG applauds the Sacramento Regional Transit District (SRTD) for launching the DNA transitional analysis initiative to explore cost reduction options for the project and recommends that the Final Program Environmental Impact (FPEIR) explicitly describe the modifications to the alignment, operations and rail technology being considered through this effort in a manner that makes these documents internally consistent. Preliminary SACOG analysis suggests possible opportunities for cost reductions and accelerated project delivery through using lighter rail technologies. Additional cost savings and operational efficiencies may be possible through connecting the DNA line to the starter rail line between downtown Sacramento and West Sacramento versus the prevailing concept of connecting the DNA line to the Gold Line.

CI4-2

2) Please consider mentioning in the FPEIR project description that the Metropolitan Transportation Plan for 2035 (MTP2035) identifies the Truxel crossing as a bridge that also supports automobile travel. The DPEIR identifies the bridge as only a transit, pedestrian and bicycle crossing while the MTP2035 has described the crossing as also supporting automobile travel since the initial release of the MTP project list in June 2007. The absence of an SRTD comment in opposition to the all-modal concept for the proposed Truxel Bridge during either of the two 45-day MTP comment periods in 2007 (July – September and November – December) nor during the associated EIR comment period in 2007 (November – December) encourages SACOG that an all-modal crossing can continue to be investigated through advance planning and project-level environmental analysis.

SACOG suggests that reconciling the DPEIR project definition of the Truxel crossing with the MTP2035 definition occur through subsequent advance planning and project level environmental analyses. SACOG is optimistic that successful intra-agency collaborations will conclude in recommendations to

Letter OA1. Sacramento Area Council of Governments

Response to Comment OA1-1

The alternative of connecting the proposed streetcar line as the first phase of the DNA line has been considered by Regional Transit staff. A streetcar connection to the Richards Boulevard area may have potential cost savings. However, streetcar service would not meet the purpose and needs for the DNA extension.

Streetcars are slower and make more stops. Streetcars may be more effective on a short run verses a 13 mile service, the goal of the DNA line to the airport. It may be possible to built the first phase of the DNA extension as a streetcar operation, however, streetcar civil and track elements are not constructed to the standards of light rail. A streetcar service might have some short term savings, but it would ultimately cost more to build, then remove as the infrastructure would need to meet light rail standards. The infrastructure might be built to light rail standards with a streetcar vehicle, but at that point the existing Gold Line extension would be cost effective without the need to purchase additional vehicles.

Response to Comment OA1-2

The Locally Preferred Alternative for the DNA alignment, adopted by the Regional Transit Board in December 2003, only includes a transit bridge and facilities for pedestrians and bicycles. Any further consideration for an automobile bridge would need to be included in other future environmental analysis.

inform potential amendments to the American River Parkway Plan and the 2012 MTP update. Furthermore, SACOG remains committed to seeing that each of the concerns identified by community stakeholders regarding the inclusion of auto traffic on the river crossing are fully considered through the advance planning and project level environmental analysis efforts.

SACOG's MTP2035 and associated EIR analyses identify significant regional benefit to a multi-modal Truxel (transit/automobile/bicycle/pedestrian) crossing of the American River. The key benefits of an all-modal crossing include:

- **Serving local trips to Blueprint opportunity areas.** The crossing provides needed auto/transit/bicycle/pedestrian connections between Downtown Sacramento and South Natomas. Based on existing development and planned growth in these areas, the new vehicle crossing would be fully utilized by local trips, i.e. trips to and from these communities. This allows these local trips to get off the already crowded I-5 freeway crossing and augments the planned Northgate/SR 160 improvements that alone cannot adequately serve the projected local trip demand between the two sides of the river.

- **Congestion relief on the freeway system.** By allowing local traffic (i.e. trips originating and ending in locations very near the new crossings) to use local streets to make their trips, the freeway system is less congested and can better serve the longer trips (eg: inter-regional goods movement).

CI4-1

- **Complement to planned transit investments.** Providing auto capacity augments and is needed in addition to the aggressive transit improvements planned for the river crossing. Transit has a significant role in handling future demands in the DNA corridor (light rail extension to the Airport, combined with more local bus service). However, even with robust transit service, a significant share of travel in the corridor will continue to be by automobile. Even for those who use transit regularly, some portions of trips are made using automobiles. Not addressing the severe auto congestion along the I-5 crossing will result in reduction of the overall market of travelers in this corridor, and will make the areas less attractive for future residents, workers, and employers anticipated in infill opportunity areas, such as the Railyards, Township 9 and Natomas. SACOG modeling suggests that including vehicle lanes to the proposed Truxel Bridge results in approximately a 1 percent decrease in total light rail boardings from a bridge that is limited to rail, bicycle and pedestrian travel. This modest reduction in total light rail boardings is countered by the benefits an all-modal bridge offers for expanded travel choices. Flexibility of travel options are critical to providing the region with a balanced transportation system that can accommodate the projected growth and increased demand by 2035 given our constrained physical infrastructure.

- **System redundancy and flexibility in responding to area-wide disasters or major incidents on roadways will be improved by having additional auto crossings.** The 2005 Hurricane Katrina flood disaster brought to light Sacramento's vulnerable levees and ranked our region as a national concern for serious flooding. Thirty five percent of our region's population, or more than 720,000 people, lived inside a 200-year floodplain in 2005. The

confluence of two rivers with significant flood risk – the American and the Sacramento - is of particular concern because these rivers surround two perimeters of Sacramento's central business district (CBD), West Sacramento and Natomas. In the context of federal guidance on transportation safety and security planning needs, SACOG conducted a comparative analysis of river crossings in peer river city CBDs and concluded that Sacramento has fewer river crossings than any of the peer river cities and the most constrained evacuation routes from Downtown Sacramento are to the north (where currently only I-5, Jibboom and SR 160 provide crossings).

CI4-2

CI4-3

3) SACOG appreciates SRTD's commitment in the DNA transitional analysis project scope (1/15/08) to incorporate data and findings from the MTP2035 in the future planning efforts for the DNA project. Updating the data used for future DNA planning efforts is important because the DPEIR references pre-Blueprint land use projections and roadway and transit networks that have been updated. As future planning and environmental analysis for the DNA corridor is prepared, SACOG welcomes the opportunity to work with SRTD to apply the most current modeling tools and land use projections along with future assumptions about roadway and transit networks in a manner that is consistent with the MTP2035.

Thank you for the opportunity to comment on the DPEIR. Please contact me if you have any questions on these comments. SACOG looks forward to working in partnership with SRTD during the subsequent DNA planning and environmental efforts on this important regional investment.

Sincerely,

Mike McKeever
Executive Director

MM:MC:ts

cc: RoseMary Covington, Sacramento Regional Transit District
Paul Marx, Sacramento Regional Transit District

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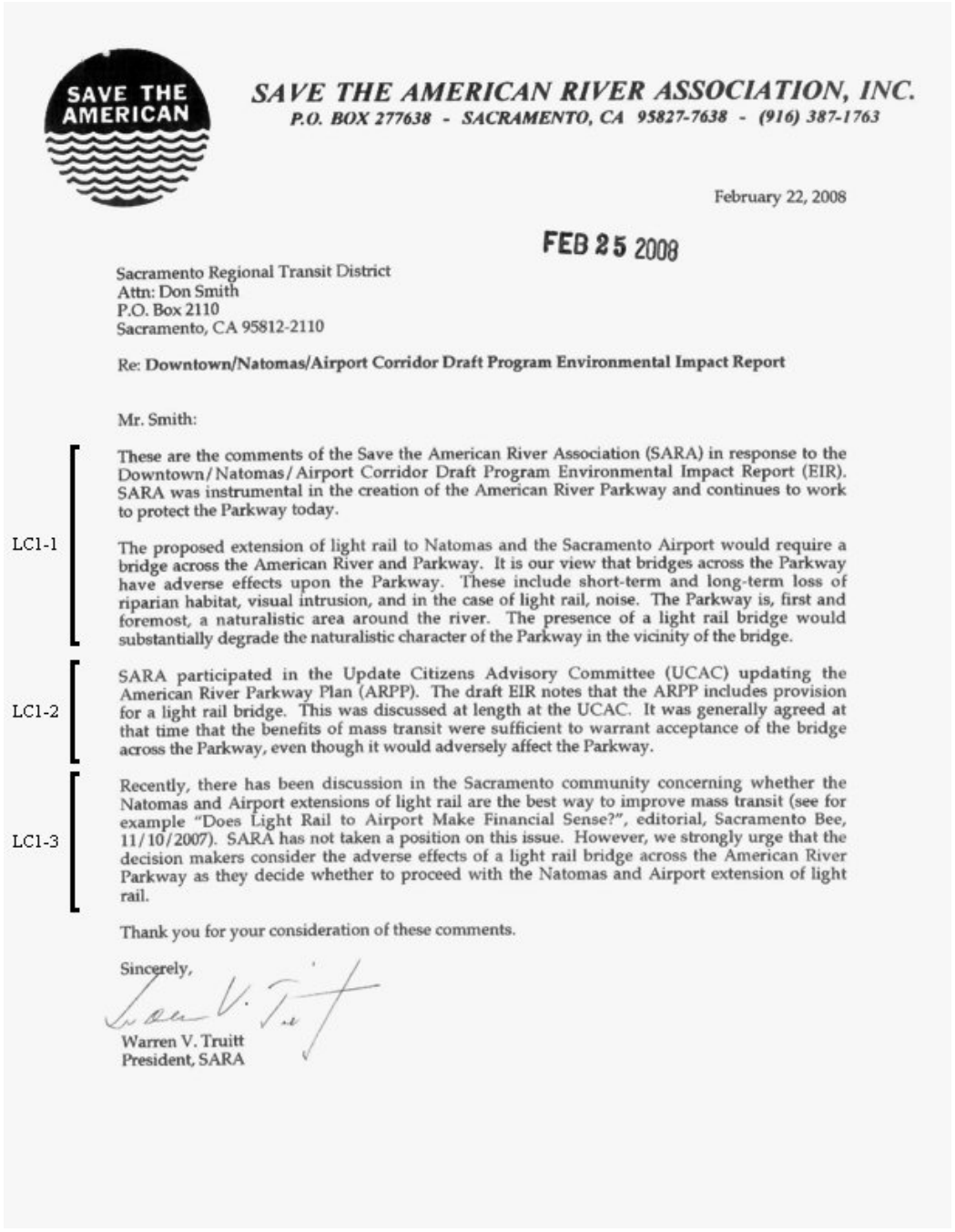
Response to Comment OA1-3

Comment noted.



SAVE THE AMERICAN RIVER ASSOCIATION, INC.
P.O. BOX 277638 - SACRAMENTO, CA 95827-7638 - (916) 387-1763

February 22, 2008

FEB 25 2008

Sacramento Regional Transit District
Attn: Don Smith
P.O. Box 2110
Sacramento, CA 95812-2110

Re: **Downtown/Natomas/Airport Corridor Draft Program Environmental Impact Report**

Mr. Smith:

These are the comments of the Save the American River Association (SARA) in response to the Downtown/Natomas/Airport Corridor Draft Program Environmental Impact Report (EIR). SARA was instrumental in the creation of the American River Parkway and continues to work to protect the Parkway today.

LC1-1 The proposed extension of light rail to Natomas and the Sacramento Airport would require a bridge across the American River and Parkway. It is our view that bridges across the Parkway have adverse effects upon the Parkway. These include short-term and long-term loss of riparian habitat, visual intrusion, and in the case of light rail, noise. The Parkway is, first and foremost, a naturalistic area around the river. The presence of a light rail bridge would substantially degrade the naturalistic character of the Parkway in the vicinity of the bridge.

LC1-2 SARA participated in the Update Citizens Advisory Committee (UCAC) updating the American River Parkway Plan (ARPP). The draft EIR notes that the ARPP includes provision for a light rail bridge. This was discussed at length at the UCAC. It was generally agreed at that time that the benefits of mass transit were sufficient to warrant acceptance of the bridge across the Parkway, even though it would adversely affect the Parkway.

LC1-3 Recently, there has been discussion in the Sacramento community concerning whether the Natomas and Airport extensions of light rail are the best way to improve mass transit (see for example "Does Light Rail to Airport Make Financial Sense?", editorial, Sacramento Bee, 11/10/2007). SARA has not taken a position on this issue. However, we strongly urge that the decision makers consider the adverse effects of a light rail bridge across the American River Parkway as they decide whether to proceed with the Natomas and Airport extension of light rail.

Thank you for your consideration of these comments.

Sincerely,

Warren V. Truitt
President, SARA

Letter LC1. Save the American River Association

Response to Comment LC1-1

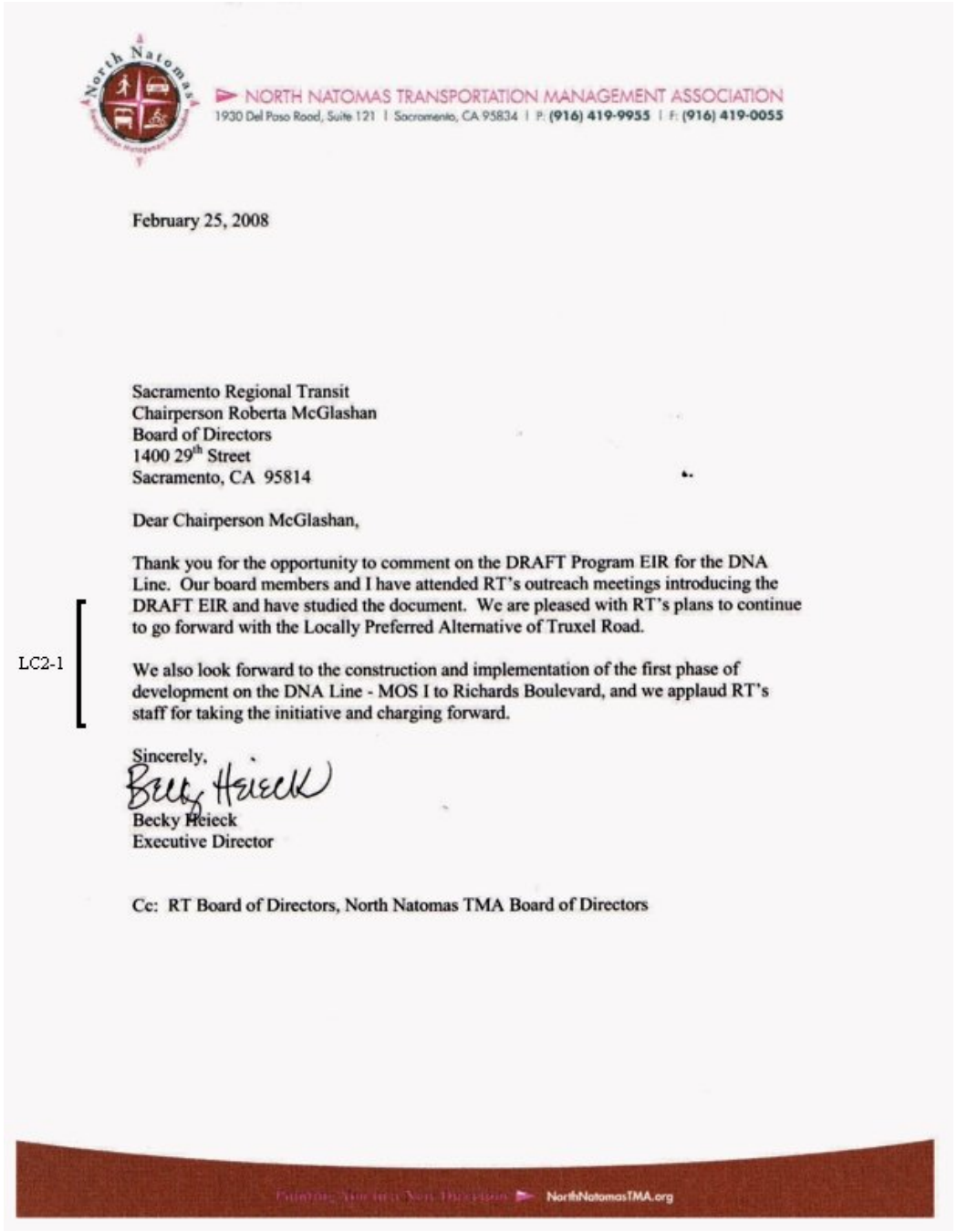
The DNA PEIR describes the effects of the project on the American River Parkway in terms of riparian habitat (see Section 4.14, Biological Resources), visual intrusion (see Section 4.11, Visual and Aesthetic Resources), and other types of impacts, and acknowledges that there will be significant adverse effects.

Response to Comment LC1-2

RT also participated in the Parkway Plan update process as an interested stakeholder, and agrees with the comment.

Response to Comment LC1-3

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.



NORTH NATOMAS TRANSPORTATION MANAGEMENT ASSOCIATION
1930 Del Paso Road, Suite 121 | Sacramento, CA 95834 | P: (916) 419-9955 | F: (916) 419-0055

February 25, 2008

Sacramento Regional Transit
Chairperson Roberta McGlashan
Board of Directors
1400 29th Street
Sacramento, CA 95814

Dear Chairperson McGlashan,

Thank you for the opportunity to comment on the DRAFT Program EIR for the DNA Line. Our board members and I have attended RT's outreach meetings introducing the DRAFT EIR and have studied the document. We are pleased with RT's plans to continue to go forward with the Locally Preferred Alternative of Truxel Road.

LC2-1

We also look forward to the construction and implementation of the first phase of development on the DNA Line - MOS I to Richards Boulevard, and we applaud RT's staff for taking the initiative and charging forward.

Sincerely,

Becky Heieck
Executive Director

Cc: RT Board of Directors, North Natomas TMA Board of Directors

NorthNatomasTMA.org

Letter LC2. North Natomas Transportation Management Association

Response to Comment LC2-1

Thank you for your comment. RT appreciates your support for the project.

Letter LC3. Natomas Community Association

NATOMAS COMMUNITY ASSOCIATION

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WWW.NATOMASCOMMUNITY.ORG

20 February 2008

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

Subject: Comments on DNA Program Environmental Impact Report

Dear Mr. Smith,

Attached please find the Natomas Community Association's comments on the subject document. If you have any questions, please contact Ken Stevenson, Board Member, at 916-201-1905, or at kenstevenson@sbcglobal.net

Sincerely,

Linn Hom
NCA President

Enclosures (1)

COMMENTS OF THE NATOMAS COMMUNITY ASSOCIATION
ON THE DOWNTOWN-NATOMAS-AIRPORT (DNA)
PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)
FEBRUARY 25, 2008

Executive Summary

LC3-1
1. Page ES-1. Is it accurate to state that the purpose of the document is "to support a determination that the appropriate means of implementing transit improvements along the DNA corridor is to construct a light rail system on the Truxel alignment?" This suggests a bias in favor of that alternative. Shouldn't the purpose of the document be to fairly present the impacts, both positive and negative, of the project alternatives?

LC3-2
2. Page ES-5. It is inaccurate to state, "development activities [in North Natomas] have not slowed down." There has, in fact, been a severe downturn in development activities over the last year or two. In fact, at least two residential projects (including the large Natomas Meadows project) have ceased sales even though model homes had been completed. A large percentage of the retail and commercial space remains vacant, and there are many empty, foreclosed homes. Activities over the next few years may come to a complete standstill as a result of restrictions imposed by FEMA due to flooding dangers.

LC3-3
3. Page ES-8 states that the DNA project would reduce vehicle-miles traveled by approximately one percent as compared to future conditions. This is inconsistent with data in Table 4.12-3, which shows a reduction (excluding RT VMT) from 73,998,203 VMT to 73,980,971 VMT. This is a reduction of 0.02 percent, which cannot accurately be described as "approximately one percent." The reduction is so miniscule that it cannot be fairly characterized as even a "small benefit." The DNA project should be characterized as having no impact on air quality, as the effects of this tiny reduction in VMT on air quality would be of no consequence.

LC3-4
4. Page ES-11 describes the alignment as including certain specific design options, whereas other sections of the report indicate that design options have not yet been chosen. See comment 2.1 for further discussion of this issue.

LC3-5
5. Section ES 4.2.2. It is inaccurate to characterize the impacts on congestion that would result from the project as "minimal." This discussion focuses on traffic volumes, but what are of more significance are travel times. The project would increase intersection delay times even if it did not increase traffic volumes. At many of the busiest intersections along Truxel, peak hour delay times would increase by 50 percent or more. While some intersections in the study area are identified that would experience decreased delay times, these tend to be the less-busy intersections, and the delay reductions would be slight. There also appear to be no offsetting reductions in traffic on I-5, as Table 3.6-1 shows, for each segment listed, the exact same AM peak hour travel times with or without the

1

Response to Comment LC3-1

The purpose of the document is clearly stated in the first paragraph on page ES-1 of the Draft PEIR:

"This document is the environmental analysis of the Downtown-Natomas-Airport (DNA) project. It is a program-level analysis of the entire project - focused documents will be prepared for each individual segment as those projects are advanced to subsequent stages of project development. As a programmatic document, this analysis addresses the general environmental impacts of the DNA project as a whole based upon the general alignment adopted by the Sacramento Regional Transit District in 2003 (i.e., the Truxel alignment). Further analysis and final decisions on the exact alignment (e.g., side of the street, separate guideway, mixed-flow traffic) and exact design (e.g., architectural elements) will be made in conjunction with the more focused environmental documents to come."

In addition, Chapter 5.0, Alternatives, of the Draft PEIR was prepared in accordance with CEQA Guidelines [Section 15126(d)], which require that an EIR identify a range of reasonable alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Chapter 5.0 describes the screening process and subsequent identification and evaluation of alternatives.

Furthermore, the text the commenter cites as the "purpose of the document" is actually presented as RT's intended use of the document in the fourth paragraph, on page ES-1,

“RT's intended use of this document is to support a determination that the appropriate means of implementing transit improvements along the DNA Corridor is to construct a light rail system on the Truxel alignment. This document also will be used to support preparation of project-level environmental documents.”

Response to Comment LC3-2

Comment noted. PEIR text (p. ES-5) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-3

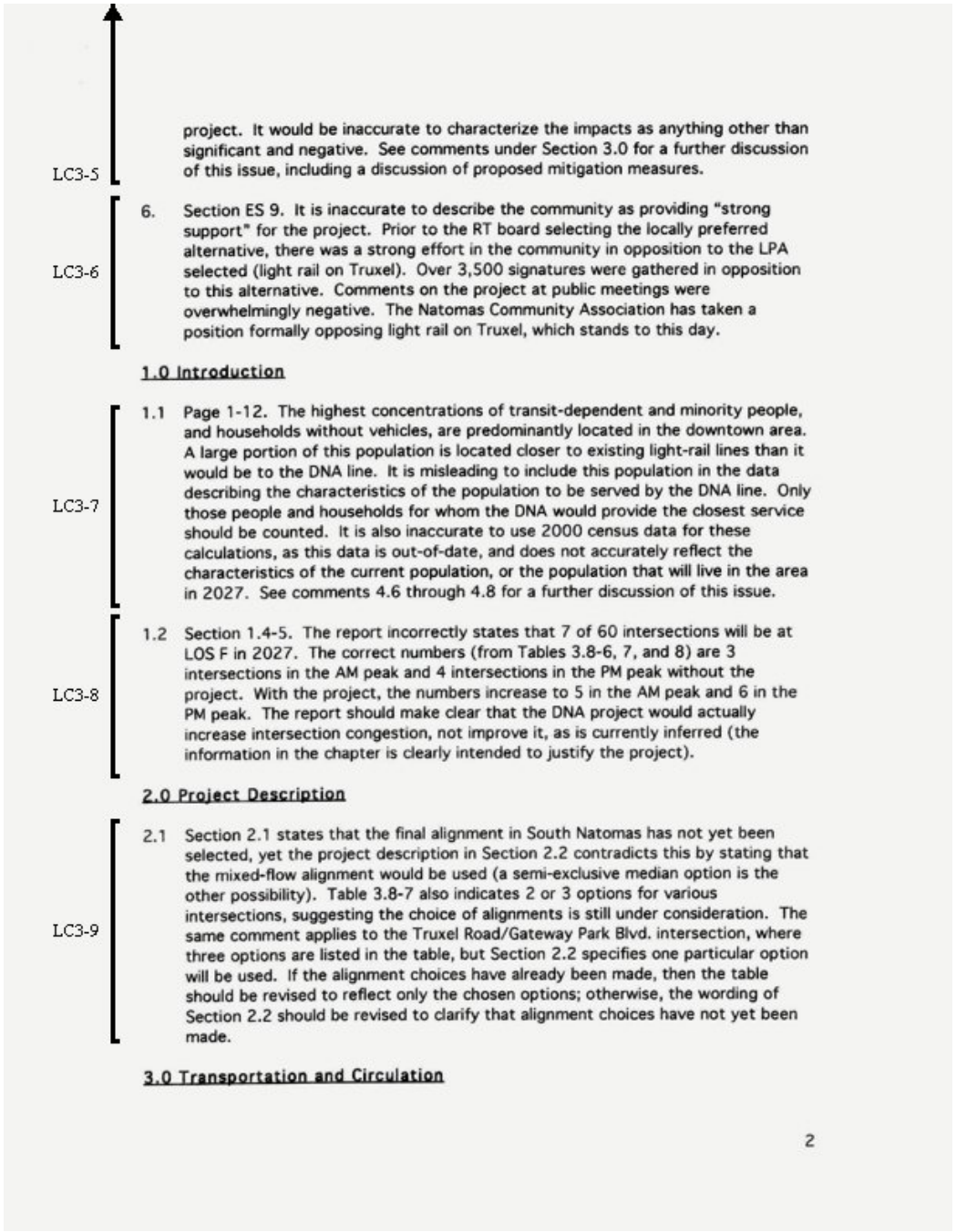
PEIR text (p. ES-8) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-4

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of future stations. These assumptions were necessary in order to assess, at a program-level, the potential impacts of the DNA project. These assumptions will be revisited during future project-level engineering and environmental review.

Response to Comment LC3-5

The transportation analysis was conducted in accordance with City of Sacramento procedures. As such, the DNA project's environmental impacts were measured by the City's standards of significance. According to the City's adopted standards of significance, a project can increase intersection delay times without triggering a significant impact if the significance criteria are not met. The transportation analysis on page 3-54 of the Draft PEIR acknowledges intersections that would have significant traffic impacts requiring mitigation.



project. It would be inaccurate to characterize the impacts as anything other than significant and negative. See comments under Section 3.0 for a further discussion of this issue, including a discussion of proposed mitigation measures.

LC3-5

6. Section ES 9. It is inaccurate to describe the community as providing "strong support" for the project. Prior to the RT board selecting the locally preferred alternative, there was a strong effort in the community in opposition to the LPA selected (light rail on Truxel). Over 3,500 signatures were gathered in opposition to this alternative. Comments on the project at public meetings were overwhelmingly negative. The Natomas Community Association has taken a position formally opposing light rail on Truxel, which stands to this day.

LC3-6

1.0 Introduction

1.1 Page 1-12. The highest concentrations of transit-dependent and minority people, and households without vehicles, are predominantly located in the downtown area. A large portion of this population is located closer to existing light-rail lines than it would be to the DNA line. It is misleading to include this population in the data describing the characteristics of the population to be served by the DNA line. Only those people and households for whom the DNA would provide the closest service should be counted. It is also inaccurate to use 2000 census data for these calculations, as this data is out-of-date, and does not accurately reflect the characteristics of the current population, or the population that will live in the area in 2027. See comments 4.6 through 4.8 for a further discussion of this issue.

LC3-7

1.2 Section 1.4-5. The report incorrectly states that 7 of 60 intersections will be at LOS F in 2027. The correct numbers (from Tables 3.8-6, 7, and 8) are 3 intersections in the AM peak and 4 intersections in the PM peak without the project. With the project, the numbers increase to 5 in the AM peak and 6 in the PM peak. The report should make clear that the DNA project would actually increase intersection congestion, not improve it, as is currently inferred (the information in the chapter is clearly intended to justify the project).

LC3-8

2.0 Project Description

2.1 Section 2.1 states that the final alignment in South Natomas has not yet been selected, yet the project description in Section 2.2 contradicts this by stating that the mixed-flow alignment would be used (a semi-exclusive median option is the other possibility). Table 3.8-7 also indicates 2 or 3 options for various intersections, suggesting the choice of alignments is still under consideration. The same comment applies to the Truxel Road/Gateway Park Blvd. intersection, where three options are listed in the table, but Section 2.2 specifies one particular option will be used. If the alignment choices have already been made, then the table should be revised to reflect only the chosen options; otherwise, the wording of Section 2.2 should be revised to clarify that alignment choices have not yet been made.

LC3-9

3.0 Transportation and Circulation

2

Response to Comment LC3-6

It is acknowledged that the Natomas Community Association and others have, over time, expressed opposition to the DNA alignment on Truxel. PEIR text (p. ES-26) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-7

Comment noted. The DNA project would be an extension of the existing Gold Line light rail service. Portions of the population that are currently served by light rail would also benefit from the expansion of light rail services and should be considered part of the population served by the DNA project. Therefore, this portion of the population should be included in the data describing the potential ridership for the DNA project. While we recognize the changing population characteristics in the Natomas area, the 2000 Census is the most current Census data available. Using Census data provides an adequate and consistent method of analyzing socioeconomic and population characteristics.

Response to Comment LC3-8

Comment noted. Some intersections in the study area would experience decreased delay times with the project, while other intersection would experience increased delay times. The transportation analysis on page 3-54 of the DPEIR acknowledges intersections that would have significant traffic impacts requiring mitigation.

Response to Comment LC3-9

The project description in the Draft Program EIR reflects certain assumptions about the light rail alignment and the location of future stations. These assumptions were necessary in order to assess, at a program-level, the potential impacts of the DNA project. These assumptions will be revisited during future project-level engineering and environmental review.

LC3-10

3.1 Section 3.6 compares Project to No Project alternatives for numerous calculations. However, the assumptions made for the No Project alternative make it an implausible alternative, and create the impression that the design of the No Project alternative was biased to favor the Project alternative.

The No Project alternative (as described in Table 5.4-2) is the same as the No Build alternative detailed in the DNA Final Alternatives Analysis (AA) Report. The AA report also studied a similar bus-based alternative called the "Baseline/TSM" (TSM) model, which the Federal Transit Administration requires to be studied as part of the AA process. According to the AA report, the TSM model is intended to demonstrate what transit improvements could be made short of building the project.

The TSM alternative as described in the AA report consists of two trunk bus routes between the airport and downtown: one direct route along the freeway, and one following roughly the DNA alignment along Truxel. Several local circulator, or feeder, bus routes were added to connect neighborhoods to the trunk routes. Existing routes connecting to areas outside the corridor were adjusted to connect to one of the trunk routes. The trunk routes would run at intervals of 30 minutes (freeway) and 15 minutes (Truxel), both peak and off-peak hours, providing headways equal to light rail. There would be 3 park-and-ride lots. As depicted in the AA report, the TSM model appears to represent a genuine attempt to design a model providing service as comparable as possible to the proposed light-rail service without constructing the line.

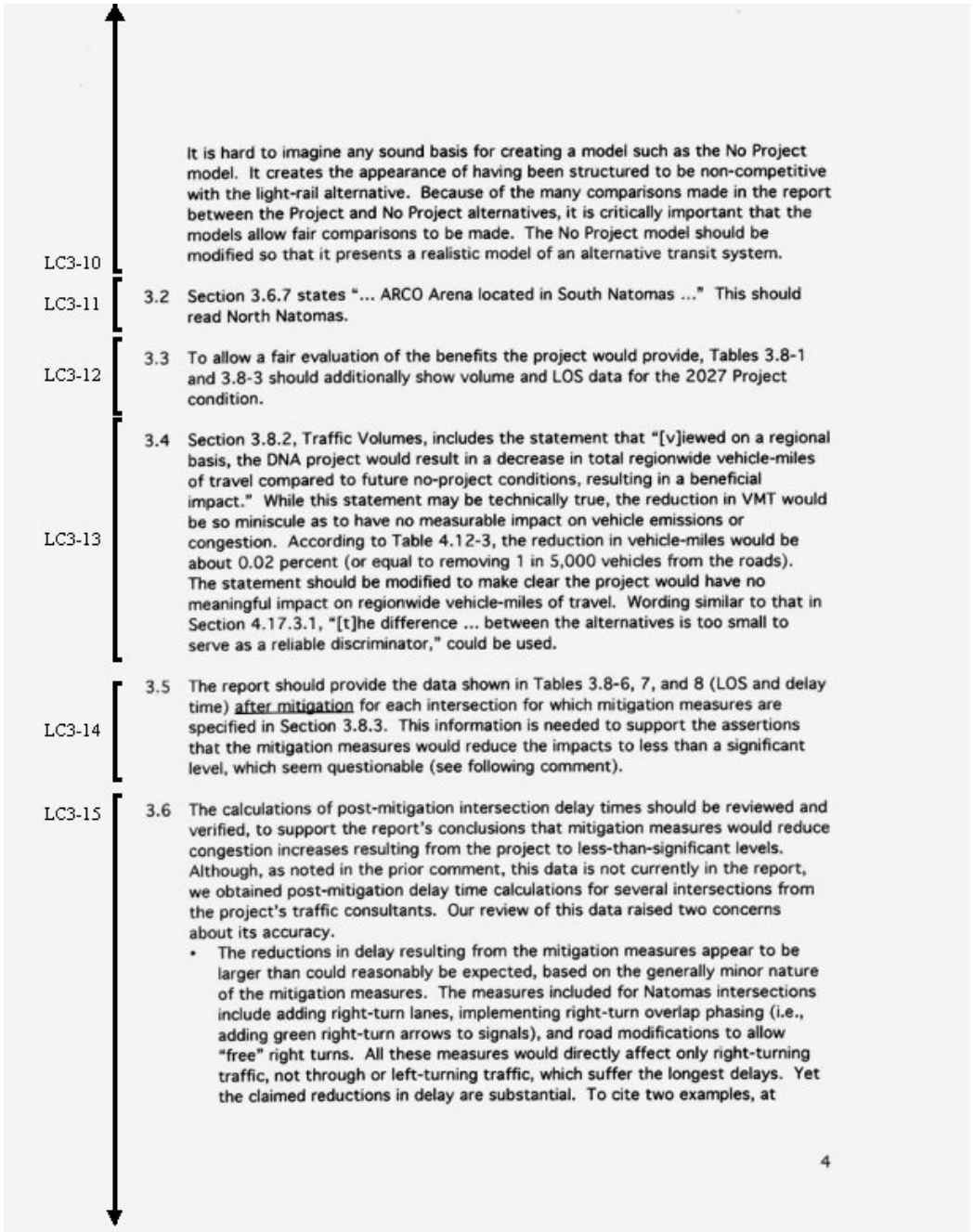
However, in the PEIR, the No Project model is used for comparative purposes instead of the TSM model. According to the AA report, the No Project (No Build) model utilizes the same bus routes as the TSM model, but includes two major differences which would severely damage its competitiveness with the Project alternative:

- There are *no* park-and-ride lots provided. This would severely harm ridership as indicated by the fact that about 40% of DNA ridership from Natomas is projected to drive to DNA (Table 3.6-10: 3,630 of 8,990 Natomas station boardings arrive by car), with the majority of those utilizing the park-and-ride lots' 2,260 spaces.
- Instead of the TSM model's 30-minute and 15-minute trunk route headways, the No Project model assumes 60-minute headways, peak and non-peak hours, on both trunk routes. Sixty-minute headways would represent a *diminishment* of the service than is currently being provided on the existing routes (RT route 11 and Yolobus route 42) serving the area, which is widely considered inadequate even under current conditions. At the same time, the headways of the feeder routes would remain the same as in the TSM model, 15 or 30 minutes. This appears to be a model (frequent feeder service to an infrequent trunk route) that would have little likelihood of ever being seriously considered for implementation. It presumes that riders would take a local bus to a transfer point, and then have to wait up to almost one hour for the "trunk route" bus to appear.

3

Response to Comment LC3-10

The No-Project Alternative presented in the Draft PEIR was based on the future transportation projects listed in SACOG's 2006 Metropolitan Transportation Plan (MTP) for 2027. The DNA LRT line was deleted from the transit network and the fixed route bus network was modified to include minimal trunkline bus service from North and South Natomas to Downtown. Downtown to Airport point-to-point bus service was added, with 30-minute headways in both directions. No new park-and-ride lots or transit centers were included in the no-project alternative. The No-Project Alternative is reasonable as a future no-build alternative used to comply with CEQA requirements for comparison purposes.



It is hard to imagine any sound basis for creating a model such as the No Project model. It creates the appearance of having been structured to be non-competitive with the light-rail alternative. Because of the many comparisons made in the report between the Project and No Project alternatives, it is critically important that the models allow fair comparisons to be made. The No Project model should be modified so that it presents a realistic model of an alternative transit system.

LC3-10

LC3-11

3.2 Section 3.6.7 states "... ARCO Arena located in South Natomas ..." This should read North Natomas.

LC3-12

3.3 To allow a fair evaluation of the benefits the project would provide, Tables 3.8-1 and 3.8-3 should additionally show volume and LOS data for the 2027 Project condition.

LC3-13

3.4 Section 3.8.2, Traffic Volumes, includes the statement that "[v]iewed on a regional basis, the DNA project would result in a decrease in total regionwide vehicle-miles of travel compared to future no-project conditions, resulting in a beneficial impact." While this statement may be technically true, the reduction in VMT would be so miniscule as to have no measurable impact on vehicle emissions or congestion. According to Table 4.12-3, the reduction in vehicle-miles would be about 0.02 percent (or equal to removing 1 in 5,000 vehicles from the roads). The statement should be modified to make clear the project would have no meaningful impact on regionwide vehicle-miles of travel. Wording similar to that in Section 4.17.3.1, "[t]he difference ... between the alternatives is too small to serve as a reliable discriminator," could be used.

LC3-14

3.5 The report should provide the data shown in Tables 3.8-6, 7, and 8 (LOS and delay time) after mitigation for each intersection for which mitigation measures are specified in Section 3.8.3. This information is needed to support the assertions that the mitigation measures would reduce the impacts to less than a significant level, which seem questionable (see following comment).

LC3-15

3.6 The calculations of post-mitigation intersection delay times should be reviewed and verified, to support the report's conclusions that mitigation measures would reduce congestion increases resulting from the project to less-than-significant levels. Although, as noted in the prior comment, this data is not currently in the report, we obtained post-mitigation delay time calculations for several intersections from the project's traffic consultants. Our review of this data raised two concerns about its accuracy.

- The reductions in delay resulting from the mitigation measures appear to be larger than could reasonably be expected, based on the generally minor nature of the mitigation measures. The measures included for Natomas intersections include adding right-turn lanes, implementing right-turn overlap phasing (i.e., adding green right-turn arrows to signals), and road modifications to allow "free" right turns. All these measures would directly affect only right-turning traffic, not through or left-turning traffic, which suffer the longest delays. Yet the claimed reductions in delay are substantial. To cite two examples, at

4

Response to Comment LC3-11

PEIR text (p. 3-46) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-12

Table 3.8-1 of the Draft PEIR shows year 2005 daily volumes and year 2027 No-Project daily volumes on I-5 and I-80 in the DNA corridor. Table 3.8-1 also shows 2005 and 2027 levels of service. Table 3.8-3 shows year 2005 daily volumes and year 2027 no-project daily volumes on surface streets in the DNA corridor. Table 3.8-3 does not show levels of service. Please refer to Table 3.8-5 for year 2027 volumes on surface streets with the project. This table also presents an evaluation of the negative or positive percent difference from year 2027 no-project conditions.

Response to Comment LC3-13

Although the 17,232 reduction in VMT is a "small benefit" on a regional scale, assuming that the resulting benefit is primarily focused on the roadways in the DNA corridor, the reduction would then be viewed as a sizable benefit to the Natomas area.

Response to Comment LC3-14

Level of service and delay after implementation of mitigation measures, while included in the technical report, was omitted from the tables and text so as to not suggest a degree of specificity inappropriate for a program-level EIR. Future project-level engineering and

environmental review will provide an opportunity to further evaluate the DNA project's potential impacts on traffic and circulation and to refine mitigation measures for these impacts.

Response to Comment LC3-15

The commenter does not provide evidence, such as technical analysis, to show that the reduction in delay shown on the calculation data worksheets with the proposed mitigation measures is implausible. Furthermore, implementation of right-turn overlap phasing and the addition of right turn lanes would not only directly affect right turning traffic, but would reduce delay and time needed to serve right turns providing additional time within the cycle length to serve other movements, thereby reducing the delay of non-right turn movements.

Study area intersections were evaluated in accordance with Highway Capacity Manual 2000 techniques and impacts were determined in accordance with City of Sacramento standards of significance utilizing appropriate data analysis tools, such as TRAFFIX software.

The calculation sheets depict the intersection configuration at the Truxel Road and Gateway Park intersection that existed at the time the peak hour volume counts were collected. The commenter correctly notes this intersection has been improved to include a triple left turn lane on the northbound approach and on the westbound approach subsequent to collection of count data. Future project-level design and engineering will provide an opportunity to further evaluate and refine mitigation measures for this intersection.

Truxel/San Juan, the report proposed adding one right-turn lane to the existing 21 approach lanes, and overlap phasing in all directions (MTRAN-6 and 7). This is claimed to result in AM peak-hour delays of 76.3 sec. (no project, Table 3.8-6) to 110.1 sec. (with non-mitigated project, Table 3.8-8) to 38.8 sec (with mitigated project). It seems implausible that the mitigation measures could reduce the average delay *with* the project to about half of what they would be *without* the project. For the Truxel/Gateway Park intersection, the data show average PM peak-hour delays of 45.4 sec. (no project, Table 3.8-7) to 76.6 sec. (with non-mitigated project, Table 3.8-8) to 40.0 sec (with mitigated project). In the case of the latter intersection, the only recommended mitigation is to modify one right-turn lane to allow "free" right turns (i.e., turns allowed without stopping or yielding). This is at an intersection with 24 approach lanes (actually 25 lanes, see following comment). It simply defies belief that this very minor change could reduce average delays by nearly half.

- Incorrect lane configurations were used for the Truxel/Gateway Park LOS calculations, so the results are most likely erroneous. The calculations assumed a northbound lane configuration of 2/4/1 (left/through/right), but it is actually 3/3/2. For westbound traffic, 2/2/1 was assumed, but it is actually 3/1/1. This also impacts the feasibility of the proposed mitigation measure, as there are currently 2 northbound right-turn lanes instead of the 1 lane assumed.

LC3-15

3.7 Comment: The Truxel Road/Gateway Park Blvd. intersection carries the highest volume of traffic of any intersection in the City of Sacramento. It is currently also one of the most congested intersections in the city, with long delays frequently occurring, and traffic backed up for long distances on each of the approaches. Table 3.8-3 shows that traffic volumes will grow by about 30 percent by 2027, which will make existing congestion levels substantially worse, even without the project. Table 3.8-8 shows that if an at-grade alignment option is chosen, average peak hour delays would increase by 51 to 110 percent over what they would be without the project.

LC3-16

This is clearly intolerable. The report describes a third option, grade separation of the tracks (for example, tracks on a bridge over Gateway Park), which would greatly reduce the increases in delay times. Grade separations have been employed along the Folsom line at Power Inn Road, Watt Ave., and Sunrise Blvd., because they were necessary to maintain acceptable traffic flow at adjacent intersections. A grade separation would be needed as much at Gateway Park as at any of these other intersections. This is the only option that should be considered at this location.

3.8 Section 3.9 does not state whether the parking that currently exists along the east side of Truxel Road in South Natomas would be eliminated. If that is the case, this impact should be listed (the semi-exclusive median right-of-way option would seem likely to have this impact).

LC3-17

3.9 Section 3.9.3 should state the total number of spaces the analysis determined were needed in both South and North Natomas, to provide a measure of the extent of the shortage of park-and-ride spaces.

LC3-18

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Response to Comment LC3-16

Grade separation at the intersection of Truxel Road and Gateway Park would reduce queuing and delay as compared to an at-grade crossing. Future project-level design and engineering will provide an opportunity to further evaluate and refine mitigation measures for this intersection.

Response to Comment LC3-17

As noted in Chapter 3.0, Section 3.9 of the Draft PEIR, two types of parking effects were considered: (1) increases in parking demand in and around transit stations and (2) reductions in parking demand, primarily in Downtown, due to enhanced transit service provided by the DNA project. The decision to eliminate parking that currently exists on Truxel Road would be made during future project-level design and engineering.

Response to Comment LC3-18

Please refer to Chapter 3.0, Table 3.9-1 in the Draft PEIR, which shows 2,250 total parking spaces would be required at the proposed park-and-ride lots in the South and North Natomas area to accommodate the parking demand generated by the DNA project.

LC3-19 3.10 Does the use of the 1.15 average vehicle occupancy factor consider the impact of the HOV lanes to be built on I-80 and I-5? It is generally assumed that higher AVO's result when HOV lanes are built, and the report's projections assume these improvements have been put in place.

4.0 Environmental Setting and Environmental Consequences

LC3-20 4.1 Figures 4.2-2, 3, and 4 do not depict existing land uses, as indicated by their titles. They appear to instead depict current land use designations (i.e., much of the land for which developed uses are indicated is currently undeveloped).

LC3-21 4.2 Section 4.4.2 states "... Natomas Association ..." Should read Natomas Community Association.

LC3-22 4.3 Section 4.4.3, DNA Project Impacts. It would be helpful if the following paragraphs included subheadings to clarify which neighborhoods the comments apply to.

LC3-23 4.4 For the area south of the river, the section states that children walking to two area schools would not have to cross rail tracks. This information should be added for other neighborhoods (how many schools are located in each area, and whether or not children walking to school would have to cross the tracks).

LC3-24 4.5 Section 4.5.2 states the DNA study area is projected to grow 3% per year between 2000 and 2027, vs. 1% for the city and 2% for the county. This conflicts with section 1.4.1, which cites figures of 2%, 1.1%, and 1.3%, respectively (although for the slightly different timeframe of 2000 to 2025).

LC3-25 4.6 Section 4.5.2 cites numerous demographic characteristics of the study area's population. However, the data used is based on 2000 Census data, and therefore excludes a substantial portion of the current population; specifically, new North Natomas residents. As a result, the population data in the report reflects no more than two-thirds of the study area's current population, and even less of the projected 2027 population.

Table 4.5-1 shows a 2000 population of 60,425 in the DNA study area, and Table 1.4-1 shows North and South Natomas to represent over two-thirds of this population (41,223). The latter table also shows that by 2005, the Natomas population had grown to 70,300, an increase of nearly 30,000 (or over 70 percent). The growth in Natomas' population alone represents an increase in study area population of nearly 50 percent by 2005, and very likely more than that today. Furthermore, it is likely that the new population, consisting mainly of new North Natomas residents, has significantly different demographic characteristics (higher income, less transit-dependence) than that of the older population.

The study should utilize more current population data as available, to provide a more accurate description of the study area population. If more current data is not available, the report should disclose this flaw. As the report states, "An

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Response to Comment LC3-19

The vehicle occupancy rate of 1.15 is a reasonable assumption for vehicle trips in a corridor containing HOV lanes on the freeway.

Response to Comment LC3-20

Figures 4.2-1, 4.2-2, 4.2-3, and 4.2-4 depict existing land use designations, rather than the actual land uses. PEIR text (p. 4.2-3, 4.2-7, 4.2-9, and 4.2-11) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-21

PEIR text (p. 4.4-9) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-22

Comment noted. The discussion of DNA project impacts on community resources, beginning on page 4.4-12, follows the alignment from south to north, which is consistent with the format of impact evaluation throughout the Draft PEIR.

Response to Comment LC3-23

Please refer to Figure 4.4-2, Community Facilities in the DNA Study Area, of the Draft PEIR, which shows all community facilities within and potentially impacted by

the DNA project. As stated on Page 4.4-13, “Two elementary schools are located in the area; however, children walking to these schools would not be required to cross the rail lines to get to school. Other community facilities identified in Figure 4.4-2 would not be impacted by implementation of the DNA project.” Furthermore, please refer to Section 4.10, Public Safety and Security, page 4.10-6, of the Draft PEIR for an evaluation of child safety at Natomas High School and Inderkum High School.

Response to Comment LC3-24

The projected growth shown in Section 4.5.2, Table 4.5-1 is correct. PEIR text (p. 1-9) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC3-25

Comment noted. While we recognize the changing population characteristics in the Natomas area, the 2000 Census is the most current Census data available. Using Census data provides an adequate and consistent method of analyzing socioeconomic and population characteristics.

understanding of the demographic characteristics of the DNA study area ... is necessary to assess potential socioeconomic and fiscal impacts of implementing the DNA project." Without accurate data, the understanding will be skewed.

LC3-25

4.7 The study area also includes, in the downtown area, a sizable area that is already served by light-rail lines (the Watt and Folsom lines). Populations residing in these areas would presumably be more likely to access the system via existing stations than any new stations built as part of the DNA project (see figures 4.7-1 and 2). It seems inappropriate to include this population in a description of the population to be served by the DNA line. The population data should be recalculated to exclude the population living in these areas.

LC3-26

4.8 Section 4.7, Environmental Justice. The comments above relating to the accuracy of demographic data also apply to this section. Data cited in Table 4.7-1 are likely to be out-of-date for the reasons cited above. Also, Table 4.7-2 shows that the population in "households without vehicles" is concentrated almost entirely in census tracts located south of the river, and as noted above, many of these tracts are located nearer to existing light-rail lines than they are to DNA, and should probably be excluded from descriptions of the population to be served by the DNA line. If the table used more accurate data, it would likely show a smaller transit-dependant population.

LC3-27

LC3-28

4.9 Section 4.10, Public Safety and Security. Comment on the safety of locating light rail within the Truxel Road right-of-way in South Natomas:

The locally preferred alternative selected by the RT board, light rail on a Truxel Road alignment in South Natomas, poses inherent dangers to public safety that could have been avoided by selecting an alternative using bus and/or an alternate alignment.

According to the report, two alignment options are being considered for this segment of the line:

- Running a single track in the median of Truxel Road (semi-exclusive alignment), or
- Running double tracks in Truxel Road's two left lanes, with both trains and vehicles sharing the lanes (mixed-flow alignment).

The second option is of particular concern. Left-turn pockets would remain between the two tracks, so drivers would have to cross both sets of tracks to make left turns. This is a very unusual arrangement. Normally, the only place light-rail trains and cars would be found sharing lanes is in downtown areas, where higher levels of congestion and slower vehicle speeds are common. They are seldom, if ever, found in suburban locations.

Mixed-flow alignments are the most dangerous of six types of light-rail alignments. The Transportation Research Board studied the alignment safety issue in TCRP Report 17, *Integration of Light Rail Transit into City Streets*, and found that "[light rail vehicle] accidents in shared rights-of-way account for the largest proportion of

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Response to Comment LC3-26

Please refer to response to Comment LC3-7.

Response to Comment LC3-27

Please refer to the responses to Natomas Community Association Comments LC3-7 and LC3-25.

Response to Comment LC3-28

While no specific design option for light rail operations on Truxel Road have been selected, a potential range of options, including mixed flow, were included for evaluation at the program-level. Future project-level design and engineering will provide an opportunity to further evaluate and refine track alignments along Truxel Road.

each surveyed system's accidents [92%], even though this type of alignment constitutes the smallest proportion of route miles [31%]." In Sacramento, the study found that 85 percent of accidents occurred on this type of right-of-way, although it represented only 26 percent of mileage. They reported the worst section of the Sacramento system is on 12th Street, a one-way street with cars and trains sharing the same travel lane (although it represented only 7% of system mileage, 57% of the system's accidents occurred on 12th St.). With vehicles turning in *both* directions on Truxel (a 2-way street), and two sets of tracks with vehicles waiting between them to turn, it's easy to imagine Truxel having a worse safety record.

To quote the report: "Thus, from a safety perspective, the amount of exclusive ... or semi-exclusive ... rights-of-way on separate alignments ... should be encouraged. These rights-of-way maximize speed, capacity, and reliability while also minimizing interferences and conflicts with motor vehicles and pedestrians. Where physical or cost considerations require operation in shared rights-of-way, the amount of physical separation from motor vehicles and pedestrians should be maximized. Safety considerations, therefore, suggest the following sequence of route alignment choices in order of desirability ...." It then ranked "operation in mixed traffic" dead last (6 of 6). Making matters worse is the fact that the types of physical separation suggested (i.e., curbs or fencing) would, for the most part, not be possible for the double-track option along Truxel.

The first option (tracks in a semi-exclusive median) is also problematical. It would allow for only a single track for a distance of nearly 2 miles, meaning northbound and southbound trains would share the same track, so one train passing an opposing train would be impossible, and running times would likely be lengthened (whenever one train had to wait for an opposing train to pass). Because 4 through lanes and turn lanes would be retained in addition to the additional space that would be required for the tracks (at intersections), either the elimination of bike and/or parking lanes, or the narrowing of vehicle lanes, would be required in order to stay within the current narrow right-of-way. While turning vehicles would still need to cross over tracks, the potential for vehicle/train conflicts would be reduced.

If light-rail is built along Truxel through South Natomas, avoidable accidents, injuries, and possibly even deaths will result, because RT's board chose not to make public safety its top concern, and rejected the safer alternatives that were available.

LC3-28

LC3-29

4.10 Section 4.10.3, Accidents subsection. The text states that local experience suggests mixed-flow rights-of-way can be expected to have an accident rate of about double that of semi-exclusive rights-of-way (0.30 accidents per crossing per year vs. 0.16), and references to Table 4.10-1. However, based on the data in the table, this is an erroneous statement. The table actually compares high-speed to low-speed (above or below 55 km/h) rights-of-way, and does not differentiate between alignment types (mixed-flow, semi-exclusive, or exclusive).

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Response to Comment LC3-29

The commenter refers to Table 4.10-1 and disagrees with the degree to which mixed flow operations accident rates are higher than for other alignment types. The commenter correctly notes that Table 4.10-1 summarizes accident experiences at LRT crossings above 55 kilometers per hour and at LRT crossings below 55 kilometers per hour, or about 34 miles per hour. As indicated in the table headings, both above 55 km/h data and below 55 km/h data include semi-exclusive ROW, however, above 55 km/h data includes "Separate ROW" while the below 55 km/h data includes "Non-Exclusive ROW including…Mixed Flow Operation." The commenter suggests that mixed flow operations have an accident rate per mile 16 times that of other alignment types, however, no analysis, such as a technical analysis is provided to support calculation of the "16 times" number.

Even though the commenter disagrees with how much mixed flow operations accident rates are higher than for other alignment types, the conclusions of the analysis do not change. The Draft PEIR states there is potential accident risk represented by mixed-flow operations where trains operate in the same travel lanes as automobiles, including the approximately 2 miles on Truxel Road (Impact SS-2). The section states this is a potentially significant impact because RT has experienced higher accident rates where the light rail operations are in mixed flow conditions (please refer to page 4.10-4 of the Draft PEIR). The section concludes that when operated as a mixed-flow system, as in the case for the DNA project, the potential for accidents is considered an unavoidable impact (please refer to page 4.10-6).

Regional Transit, and other cities such as Los Angeles, Houston and others, have been operating light rail in two-way traffic for years without issue. However, the more detailed environmental analysis to be conducted with the next phases of development will identify any potential significant environmental impact that may occur with a light rail operation in a two-way street.

In fact, data in the report cited above (TCRP Report 17) suggest an accident rate much higher for mixed-flow operations in Sacramento compared to exclusive or semi-exclusive rights-of-way. As previously noted, the report states that mixed-flow operations accounted for 85 percent of accidents but represented only 26 percent of system miles. This suggests that mixed-flow operations have an accident rate per-mile 16 times that of other alignment types. This ratio would be more consistent with the nationwide data cited in the TCRP report.

It is useful to include data comparing accident rates for the different alignment types in the report, but this data should be reviewed and revised to ensure its accuracy.

LC3-29

4.11 Section 4.10.3, Mitigation Measures subsection. It would be useful to specify which intersections, or types of intersection, would be equipped with crossing gates, based on the various alignment options described (semi-exclusive side, semi-exclusive median, mixed-flow, etc.), as opposed to signals without crossing gates.

LC3-30

4.12 Section 4.13, Noise and Vibration, does not but should address the impact of train horns or station announcements on adjacent residents.

LC3-31

4.13 Table 4.20-1 cites the number of people currently living within 300 feet of the alignment. This number is not relevant, and the table should instead cite the number of people projected to be living within 300 feet of the alignment at the time construction occurs.

LC3-32

5.0 Alternatives

5.1 Table 5.4-1 cites a project travel time from downtown to the airport of 29 minutes. This is misleading, as it appears to be the best time possible. Table 3.6-1 shows a travel time of 43 minutes during the AM peak, significantly longer. It would be more accurate to provide the full range of projected travel times.

LC3-33

9

Response to Comment LC3-30

Specific details regarding crossing gate design, including a list of which intersections will include crossing gates, will be determined during future project-level design and engineering.

Response to Comment LC3-31

As described on page 4.13-2 of the Draft PEIR, the noise and vibration impact evaluation was conducted in accordance with the general assessment methods for both noise and vibration (FTA, 1995). RT's Resolution No.97-03-2805 establishes the policy for rail transit noise mitigation based on the Federal Transit Administration noise impact criteria. This policy requires that calculated noise levels be increased by 1 dBA to ensure that noise levels projected to be very near the criteria for "impact" will be subject to mitigation. Furthermore, as stated on page 4.13-8, these criteria apply to all rail projects as well as fixed facilities, such as storage and maintenance yards, passenger stations and terminals, parking facilities and substations. As such, the evaluation of noise and vibration impacts resulting from the operation of the DNA project includes potential impacts associated with operations at station locations.

Response to Comment LC3-32

Describing specific points in time to analyze impacts has been a challenge for this multi-stage project. As stated in Section 4.1, impacts are generally evaluated relative to "existing conditions" except for some resources in which a more time-specific analysis is used (e.g., 2014 and 2027 analysis of transportation impacts). The accuracy

of the analysis relative to existing conditions is expected to be very high for developed areas such as South Natomas and areas of near-term construction (i.e., MOS-1), but lower in developing areas such as portions of North Natomas. The analysis, however, will be updated during future project-level environmental review.

Response to Comment LC3-33

The commenter is correct that Table 5.4-1 and Table 3.6-1 in the Draft PEIR are different. Table 5.4-1 is a comparison of transit in-vehicle time to make a trip from the Sacramento Valley Station to the Sacramento International Airport using the Truxel route. Table 3.6-1 is a comparison between modes of average total trip travel time, including walk time, wait time, transfer time, etc. Times in Table 3.6-1 include not just the in-vehicle time to make the trip included in Table 5.4-1, but also the time spent walking to transit, transferring, and waiting. As a result, Table 5.4-1 and Table 3.6-1 cannot be compared directly for analysis because Table 3.6-1 does not specify mode of transit travel, route choice, or trip distance between the transit alternatives. For example in Table 3.6-1, under the no-project alternative, a transit trip from the Sacramento Valley Station to the Sacramento International Airport is by bus via Interstate 5. In contrast, in Table 5.4-1 the same transit trip between the Sacramento Valley Station and the Sacramento International Airport is made using the Truxel route.

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March 4, 2008

Mr. Don Smith
Sacramento Regional Transit District
P.O. Box 2110
Sacramento, California 95812-2110

MAR 0 6 2008

Re: Draft EIR for
Downtown-Natomas-Airport Light Rail Line

Dear Mr. Smith:

This office represents Commerce Station LLC and Natomas Towne Center LLC, who are the developers of the Commerce Station Project in the North Natomas area of the City of Sacramento.

The Commerce Station Project is a high quality office, retail, hospitality and residential development on an approximately 180.5 acre site situated east of Interstate 5/Highway 99, north of Del Paso Road, and west of East Commerce Way in the North Natomas Community Plan area of the City. It will include a 20.6 acre regional shopping center and 155.8 acres of mixed uses such as office, retail, support retail, hospitality and high density residential uses.

LC4-1 Development of the Commerce Station Project was based upon the preferred alignment for the new Downtown-Natomas-Airport light rail line project (the "DNA Line") examined in the Draft EIR. The mixed uses and high residential densities proposed for the Commerce Station Project were designed to take advantage of the benefits created by the DNA Line and the future light rail station at Club Center Drive and East Commerce Way. Consequently, our clients strongly support the DNA Line in its proposed location, and do not want the alignment moved to any of the alternative locations examined in the Draft EIR. As we are certain you know, the preferred alignment for the DNA Line was incorporated into the North Natomas Community Plan many years ago and has been one of the foundations upon which all development in the North Natomas Area was based. The mixed uses and high densities in the Commerce Station Project were based upon the expectation that the DNA Line would be constructed in the preferred alignment, and the Commerce Station Project has been oriented to best accommodate that alignment.

Based upon the foregoing, please be advised that our clients do not support the Alternative described in the Draft EIR as the "I-5 Alignment". The I-5 Alignment would

Letter LC4. Law Offices of Gregory D. Thatch

Response to Comment LC4-1

Thank you for your comment. RT appreciates your support for the DNA project and the LPA.

provide little benefit to the North Natomas community, as it would be in a location immediately adjacent to the freeway that was rejected by the North Natomas Community Plan many years ago. Such a location would not provide easy access to shopping, offices or residences situated in North Natomas. The North Natomas Community Plan was created to integrate the light rail line into the very fabric of the community and the land uses found in the area. Those land uses were designed to both benefit the DNA Line and to be served by it. Building the DNA Line along the freeway for its entire length through both South and North Natomas would render those efforts useless.

LC4-1

Thank you for the opportunity to comment on the Draft EIR and the alternative alignments examined for the DNA Line. We urge Regional Transit to approve the DNA Line in the preferred alignment examined in the Draft EIR.

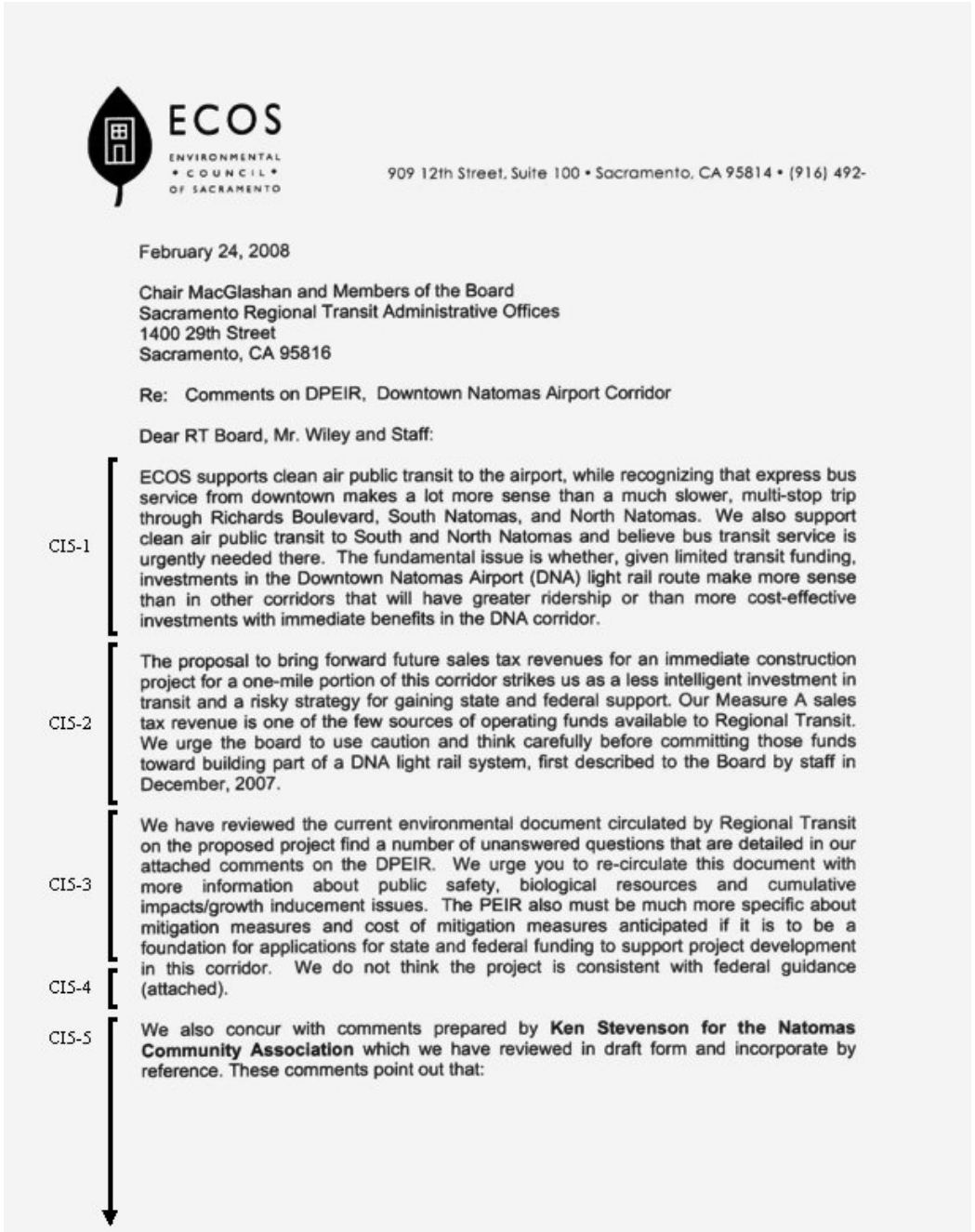
Very truly yours,

LAW OFFICES OF
GREGORY D. THATCH

MICHAEL DEVEREAUX

MD/kr
D6824.doc

cc: Brad Ross, Commerce Station LLC



ECOS
ENVIRONMENTAL • COUNCIL • OF SACRAMENTO

909 12th Street, Suite 100 • Sacramento, CA 95814 • (916) 492-

February 24, 2008

Chair MacGlashan and Members of the Board
Sacramento Regional Transit Administrative Offices
1400 29th Street
Sacramento, CA 95816

Re: Comments on DPEIR, Downtown Natomas Airport Corridor

Dear RT Board, Mr. Wiley and Staff:

CIS-1 ECOS supports clean air public transit to the airport, while recognizing that express bus service from downtown makes a lot more sense than a much slower, multi-stop trip through Richards Boulevard, South Natomas, and North Natomas. We also support clean air public transit to South and North Natomas and believe bus transit service is urgently needed there. The fundamental issue is whether, given limited transit funding, investments in the Downtown Natomas Airport (DNA) light rail route make more sense than in other corridors that will have greater ridership or than more cost-effective investments with immediate benefits in the DNA corridor.

CIS-2 The proposal to bring forward future sales tax revenues for an immediate construction project for a one-mile portion of this corridor strikes us as a less intelligent investment in transit and a risky strategy for gaining state and federal support. Our Measure A sales tax revenue is one of the few sources of operating funds available to Regional Transit. We urge the board to use caution and think carefully before committing those funds toward building part of a DNA light rail system, first described to the Board by staff in December, 2007.

CIS-3 We have reviewed the current environmental document circulated by Regional Transit on the proposed project find a number of unanswered questions that are detailed in our attached comments on the DPEIR. We urge you to re-circulate this document with more information about public safety, biological resources and cumulative impacts/growth inducement issues. The PEIR also must be much more specific about mitigation measures and cost of mitigation measures anticipated if it is to be a foundation for applications for state and federal funding to support project development in this corridor.

CIS-4 We do not think the project is consistent with federal guidance (attached).

CIS-5 We also concur with comments prepared by **Ken Stevenson for the Natomas Community Association** which we have reviewed in draft form and incorporate by reference. These comments point out that:

Letter LC5. Environmental Council of Sacramento

Response to Comment LC5-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. RT is committed to providing transit service to the airport and, as a result of an extensive Alternatives Analysis process, selected light rail along the Truxel corridor as its Locally Preferred Alternative. During the Alternatives Analysis, express bus service from the Airport to downtown, that excluded North and South Natomas population and employment areas, was not considered as an option.

Regional Transit is aware of the need to provide more transit service for the North Natomas area in general. However, funding constraints caused by a reduction of federal and state funds resulted in a reduction in bus service in 2008. The Transit Master Plan update work program that is underway will seek ways to improve service throughout the region. One task requires the

consultant team to review overall service to see if efficiencies can be found that can be used to provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions.

Response to Comment LC5-2

The New Measure A (2009-2039) identifies the Downtown-Natomas-Airport light rail project as one of five transit capital improvements eligible for funding. Funding for the transit capital improvement projects represent 3.75 percent of Measure A and 20 percent of developer fees. These funds cannot be used for transit operations.

Response to Comment LC5-3

Safety and security, biological, and cumulative impacts are described in Section 4.10, Public Safety and Security, Section 4.14, Biological Resources, and Section 4.22, Cumulative and Growth-Inducing Impacts, respectively. Because this is a program-level environmental review, RT believes that the analysis presented in the PEIR is sufficient to adequately characterize impacts to the environment at a level appropriate for a programmatic analysis. The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the resulting environmental impacts. These assumptions will be refined during future project-level engineering and environmental review. In addition, please refer to response to Comment CI5-4.

Response to Comment LC5-4

The guidance transmitted by this commenter lays out the Federal Transit Administration's approach to evaluating projects for Section 5309 New Starts and Small Starts funding in FY2009. FTA also uses the evaluation criteria in this guidance when evaluating projects for approval into the Preliminary Engineering phase of project development. RT is not seeking FTA approval of the DNA project at this time, and does not intend to seek New Starts or Small Starts funding for MOS-1. In the event that RT decides to seek New Starts funding for future phases of the DNA project, it will make every effort to comply with the rules and guidance in place at the time.

Response to Comment LC5-5

Please refer to the responses to the Natomas Community Association comment letter LC3.

CIS-5 · DNA provides no discernible air quality (or greenhouse gas emissions) benefits because it only reduces vehicle miles driven by 0.02 percent.

CIS-6 · DNA does not reduce I-5 peak hour drive times at all.

CIS-7 · DNA increases intersection delay times substantially all along Truxel. For example Truxel/Gateway Park delay times increase by 51 to 110 percent (in 2027) over what they'd be without the project.

CIS-8 · It creates totally unnecessary safety hazards in South Natomas by using the most dangerous type of alignment: having trains and cars share the same lanes. This alignment type has an accident rate 16x greater than other alignment types, based on Sacramento experience. This could have been avoided with the selection of one of the other alternatives.

CIS-9 · The project is unlikely to succeed because it will not qualify for essential federal funding (due to high costs/low ridership, and no local funds to operate it). Yet RT continues to waste time and money pursuing it.

CIS-10 · There are bus-based alternatives that could be get funded, would cost much less to build and operate, and could begin to provide an adequate level of service in a relatively short timeframe. The DNA alternatives analysis report (also on the DNA website) included one such system (called TSM) that would cost 15% of light rail's cost to put in place, and half as much to operate, yet would still provide frequent service (15 minute intervals, peak and off peak), which is equal to light rail's. As long as RT pursues light rail, they are not making progress on putting something achievable like this in place serving Natomas residents. North Natomas currently has only one bus line that goes directly to downtown, and it is woefully inadequate (route 11; infrequent service weekday daytimes, and no service evenings or weekends). FTA is placing a great emphasis now on cost-effectiveness and is supportive of effective, low-cost projects." (Stevenson letter to RT, February, 2007)

CIS-11 In reviewing the DPEIR, we examined Appendix E, which lists the consulting costs for the preparation of the document. We have inquired about the comparable cost of other public agency environmental review, including the Airport Master Plan Update and the SAFCA North Natomas Levee Improvement Project. Our brief inquiry suggests that the Regional Transit Board should ask the same question and examine in depth what has been spent on DNA planning and environmental review, as well as what has been learned. In reviewing this document, we have identified some very big missing pieces. Hopefully, the work has been done on these pieces, but they just didn't make it into the document.

Thank you for this opportunity to comment.

Sincerely,

Graham Brownstein, Executive Director

Response to Comment LC5-6 through LC5-10

Please refer to the responses to the Natomas Community Association comment letter LC3.

Response to Comment LC5-11

The consultant contracts and fees listed in the Appendix E of the Draft PEIR cover planning and environmental work conducted between 2002 and 2008. They include the Alternatives Analysis phase, conducted under Federal Transit Administration (FTA) regulations and guidelines, which evaluated a full range of transit mode and alignment alternatives and led to the Locally Preferred Alternative decision in 2003. They also include efforts to prepare a Draft Environmental Impact Statement with FTA, later suspended, as well as the preparation of this Program-level EIR. The Draft PEIR is, of necessity, a summary of the work performed to date and focuses on the impacts of the Locally Preferred Alternative at a programmatic level. As the project advances through more detailed project-level studies, more focused engineering and design will be performed along with more detailed environmental and traffic analyses, leading to project refinements and specific mitigation commitments.

Comments of the Environmental Council of Sacramento

ECOS DNA DPEIR COMMENTS

RT's intended use of this document is to support a determination that the appropriate means of implementing transit improvements along the DNA Corridor is to construct a light rail system on the Truxel alignment. This document also will be used to support preparation of project-level environmental documents. As described in the CEQA Guidelines (Section 15168), a program-level document can be incorporated into future project-level documents to:

- Provide a basis for determining whether subsequent phases may have significant environmental effects;
- Help address regional influences, secondary effects, cumulative impacts, broad alternatives, and other elements that apply to the program as a whole; and
- Focus the subsequent evaluation on new effects that had not been considered before

During future, project-level analysis of each phase, there is likely to be substantial participation by federal agencies. RT assumes that one or more future phases may be subject to the National Environmental Policy Act, with the Federal Transit Administration as the federal lead agency and with additional participation by other federal agencies with regulatory authority over the DNA project. At this time, there is no federal action on the project, and the PEIR is intended only to meet RT's obligations under CEQA." **(PEIR, 1-1)**

CIS-12

1) Chapter 1. Population and Employment Growth. The PEIR relies on population estimates from SACOG, which has been using inflated population estimates **not** based on current California Department of Finance projections.

Assembly Bill 1259 (2007), has been chaptered and states that the Department of Finance population projections released in July 2007 show that its previous population projection for the SACOG area was overstated by 30%. The relevant part of AB 1259 reads as follows:

"SECTION 1. Section 65584.7 is added to the Government Code, to read:"

"65584.7. (a) The Legislature finds and declares all of the following:
(1) Accurate and current data to estimate housing needs is necessary to ensure that state, regional, and local agencies plan effectively.
(2) The Department of Finance, which is charged with providing demographic data to aid effective state and local planning and policymaking, released updated population projections for the state on July 9, 2007.
(3) The updated projections released by the Department of Finance represent a decline of over 30 percent from the prior projection in the near-term population growth for the area within the regional jurisdiction of the Sacramento Area Council of Governments."

The bill goes on to authorize the Department of Finance to adjust its housing need projections for SACOG.

In light of this new information, it appears that RTs projections of population and housing needs which it relies on to justify the DNA project are overstated and outdated.

February 24, 2008 1

Response to Comment LC5-12

The commenter states that Regional Transit's projections of population and housing needs are overstated and outdated. Section 1.4.1, Population and Employment Growth, in Chapter 1 of the Draft PEIR uses population estimates from SACOG's 2006 MTP for 2027. At the time of preparing the DPEIR this was the most current approved land use forecast. The final draft of the updated Metropolitan Transportation Plan for 2035 and the accompanying EIR will go to the SACOG Board of Directors in March 2008 for their approval. Until this date, the MTP for 2027 is still the currently adopted plan.

Assembly Bill (AB) 1259, passed into law on October 19, 2007, provides a one-time re-issuance of the Regional Housing Needs Determination for the SACOG region. AB 1259 only notes the near-term (2013) projections are high. The Assembly Bill does not imply that the long-term (2027) projections used to analyze the future DNA project are high. Chapter 3.0, Section 3.2 of the Draft PEIR states near-term travel demand forecasts were developed by running a Year 2014 model only for the analysis of MOS-1. The purpose of the 2014 model is to provide a more meaningful analysis of near-term impacts associated with the operation of the likely first phase of the DNA project (Downtown to Richards Boulevard). The Year 2014 land use database was based on linear interpolation between existing land use and Year 2027 long-range land use forecasts for the SACMET region outside of the DNA study area. Within the DNA study area, the land use for some zones was modified to reflect known large projects near the proposed DNA alignment. This methodology is a reasonable method for a near-term transit and traffic analysis. The project-level environmental review required for future phases of the DNA project will allow for further analysis utilizing current population estimates at that time.

and must be revised downward to reflect the updated Department of Finance data released July 9, 2007. ***The DPEIR for DNA should not be certified until the RT revises its population and housing need projections based on the July 9, 2007, Department of Finance projections for the SACOG area.***

CIS-12

2) Chapter 4-22 Cumulative and Growth Inducing Impacts

CIS-13

a. The DPEIR is out of date with respect to the Airport Master Plan (refers to personal communication, 2002), which was adopted in 2007.

CIS-14

b. Mischaracterizes growth inducement in the corridor between the City and the Airport, claiming that there are no growth inducing impacts. A section specifically on Greenbriar, a Greenfield development proposed to be annexed to the City of Sacramento, argues that since the station would be dependent on developer funding and the approval of the development, it is not proposed for the project and the growth inducing impacts of the station do not occur within the DNA project.

To wit: "Growth-inducing impacts would result from stations being constructed on the Greenbriar site. If the Greenbriar development project is approved, then the optional, developer-funded station could be built to serve the development. For the discussion of growth-inducing effects, it is important to note that RT would not construct a station on the Greenbriar site and that developer funding is based on authorization to develop the property, which currently does not exist. No station is proposed for the farmland at this time, and therefore no growth-inducing impacts would occur. If the City and County choose to allow development in the area currently under consideration in the Joint Vision process and the Greenbriar proposal, then the environmental impacts of development to the farmland would be evaluated as part of that decision-making process." (p. 8, Chapter 4-22)

This is not a credible argument. Both the General Management at Regional Transit and the Executive Director of SACOG have actively promoted and advocated publicly for the City of Sacramento and the Sacramento Local Agency Formation Commission to allow development of the Greenbriar project. They have gone so far as to say that hundreds of millions of dollars of federal transportation capital funding (that is the federal approval of capital assistance to the construction of the DNA line) are dependent on the land use project being approved. They have said that the density of land use in the project is essential to make the DNA light rail line feasible. Please review the attached letters.

The City of Sacramento, in its application to LAFCo to annex the Greenbriar area outside its City limits, clearly identified the DNA line as a primary reason why the Greenbriar project should be accelerated and annexed to the City prior to the Joint Vision Planning process (the local process for considering future development in the North Natomas area of the County) and the General Plan update. The City of Sacramento Resolution adopting the final EIR for annexation of Greenbriar states in numerous locations that one of the project's primary objectives is the success of the DNA light rail line. (Resolution 2008-053, January 29, 2008)

Response to Comment LC5-13

Please refer to response to Comment CO4-5. In addition, PEIR text (p. 4.20-6) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC5-14

With regard to the Greenbriar project, the analysis in the Draft PEIR focuses on an optional station - there is no potential to induce growth if no station is present. The station is developer-funded, and therefore the DNA project itself is only growth-inducing to the extent the Greenbriar project is approved and built. RT believes this analysis to be correct.

RT acknowledges, however, that it has been a strong advocate for the Greenbriar project. In particular, RT has supported increased densities within walking distance of the optional station. Any increase in ridership enhances the DNA project's feasibility, and demonstrating feasibility is critical to securing the federal funds that will enable the construction of the full DNA project. In this manner, development of the Greenbriar project can help induce the construction of the DNA project especially if the developer provides high densities near the station.

Although RT hopes that its advocacy has helped secure Greenbriar's approval by the City and LAFCO, it doubts that this will substantially influence the actual construction of the Greenbriar project. Market forces - the demand for new housing and the availability (and relative price) of other housing options in the Sacramento region - will be the primary driver inducing the construction of the Greenbriar project. The DNA

project, with its developer-funded station, may be perceived as an amenity that influences the decision to construct the Greenbriar project, but that influence is likely to be small relative to broader market forces and other regulatory barriers. To the extent that DNA helps to induce the construction of the Greenbriar project, the environmental effects of the induced growth are described in the Greenbriar EIR, certified by the City of Sacramento on January 29, 2008.

Finally, federal approval will have to be obtained for any facility that is part a federal transportation project. The developer-funded light rail station cannot be exempt from this federal approval. The PEIR must include assessment of the growth inducing impacts associated with the Greenbriar station since it is unlikely the third segment of the DNA line would be built without the development, according to RT and SACOG., Also, because it cannot be utilized without federal design and construction approval (even though no direct federal funding would be involved in the construction of the station itself), it will have to conform to all federal guidelines and requirements.

CIS-14

c. Public safety impacts not addressed and not mitigated.

The Federal Transit Administration requires a safety and security plan. This DPEIR fails to identify and mitigate public safety impacts consistent with these requirements. ["Number C 5200.1A 12-05-02 U.S. Department of Transportation, Federal Transit Administration SAFETY AND SECURITY MANAGEMENT PLAN.] There are a number of safety and security issues that the DPEIR does not address and that are corridor level issues. The DPEIR should fully address public safety issues and also the impact on RT's insurance or self-insurance requirements to offset added liability.

CIS-15

Specifically we are concerned with the fact that the DPEIR ignores the significant flood hazard in the MOS segment and the Natomas Basin, the safety issues involved in crossing a half mile of river floodplain near the confluence of the Sacramento and American Rivers, and the impact of the airport overflight zone on two proposed light rail stations. The DPEIR should also consider the impact of the growth induced by the rail line on the flood levels in the basin (from increased surface runoff), as well as the access and time required for emergency evacuation. The DPEIR should be re-circulated to fully address these issues.

CIS-16
CIS-17
CIS-18

We are attaching documents related to these safety issues.
Flood Risk. (California Department of Water Resources, A California Challenge — Flooding in the Central Valley, October 15, 2007; Army Corp of Engineers, MEMORANDUM FOR RECORD, SUBJECT: Summary of the Natomas Basin 3% Event Screening Level Levee Certification Analysis, January 11, 2008)

CIS-19

Airport Overflight Zone. Attached letters from Mr. Pachl and Mr. Ross to City of Sacramento regarding light rail station in overflight zone, CLUP and CLUP override. The DPEIR is silent on the Metro Airpark light rail station. The Metro Airpark project was approved with a light rail station in the overflight zone. No override of the Comprehensive Land Use Plan was done at that time (that we are aware of). The Metro Airpark project document refers to construction of the light rail station by Regional Transit in accordance with its Master Plan. The DPEIR does not address the safety issues of the location within the overflight zone for this light rail station.

CIS-20

With regard to the Greenbriar LRT station, as noted above, the PDEIR erroneously dismisses the safety concerns as a land use decision to be addressed by the City in the

Response to Comment LC5-15

A discussion of the flood risk in Sacramento is provided on Pages 4.18-5 and 4.18-6 in Section 4.18, Water Resources, of the Draft PEIR. As stated in the Draft PEIR, the DNA project area in downtown Sacramento is designated by the Federal Emergency Management Agency (FEMA) as Zone X, an area protected from the base flood by the construction of a levee, dike, or other structural measure. Therefore, the area is not considered at risk for significant flood hazard as designated by FEMA.

In the Natomas Basin, the US Army Corps of Engineers (USACE) is moving forward with a Zone AR designation. As defined by FEMA, Zone AR designates a Special Flood Hazard Area formerly protected from the one percent annual chance of flood by a flood control system that was subsequently decertified and indicates that the former control system is being restored to provide protection from the one percent annual chance or greater flood. On September 27, 2007, FEMA denied an application from the City of Sacramento to designate the Natomas Basin Zone A-99, which denotes an area to be protected from one percent annual chance of flood by a Federal flood protection system under construction. The Sacramento Area Flood Control Agency is working with the City of Sacramento and the USACE to expedite work on the Natomas levee system. SAFCA has numerous projects under construction and in-planning in the Natomas area. The Draft PEIR acknowledges the USACE's recent decertification of the Natomas levee system on page 4.18-6:

"Recent local and federal studies; however, revealed that much more of the Natomas levee system is in need of repair, including erosion protection, seepage

protection, and increased levee height. As a result of these studies, the USACE recently withdrew its endorsement of the Natomas levee system. SAFCA is prioritizing work efforts for areas and levees that are at higher risk to the 100-year flood event, but all levee improvement projects are being designed to the 200-year protection specifications."

The Draft PEIR is the first-tier of environmental review for the DNA project. The second phase of the DNA project, which includes the planned river crossing into South Natomas, is tentatively scheduled to commence planning in late 2010. The project-level environmental review required at that time will provide an opportunity to reassess the level of flood risk in the Natomas Basin and incorporate the conditions into project design.

Pages 4.18-8 and 4.18-9 of the Draft PEIR acknowledge the DNA project's potential impacts to American River hydrology and flood management:

> "Because of the importance of conveying flood flows through the American River system with minimum obstructions, scoping comments indicated the need to carefully consider how the proposed transit improvements on the DNA Corridor would affect American River hydrology or would otherwise interfere with flood management efforts. In response to this concern, several meetings were convened by SAFCA with local flood management specialists to advise the DNA study team of design objectives."

As a result of coordination with local flood management specialists, SAFCA provided recommendations to RT in a letter dated November 8, 2002. SAFCA's recommendations were incorporated into the program-level environmental review as described on page 4.18-9 of the Draft PEIR and included the consideration of the following hydrologic impacts:

- Change in floodway capacity (e.g., the ability of the river to safely convey major flood flows within the levee system) caused by placement of piers, abutments, or rock-covered banks (riprap), or by project-related changes in vegetation types;
- The ability of flood control structures and other infrastructure to safely withstand the impacts of a flood event;
- The ability of local, state, and federal flood management entities to safely and thoroughly inspect, maintain and operate the flood control infrastructure at all times of the year and under all weather conditions, including flood events; and

Specifically with regard to floodway capacity, SAFCA recommended the ability to bypass flows of up to 210,000 cubic feet per second (cfs) with negligible impairment. Subsequent to these recommendations, the conceptual bridge design options were evaluated using HEC-RAS, a hydrologic software application, for their impact on water surface elevation to the extent predictable at the current level of project development.

Response to Comment LC5-16

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of future stations. These assumptions will be revisited as the project moves into more detailed engineering and environmental studies. At that time, RT will coordinate with local governments to ensure consistency with local comprehensive plans, and with the Sacramento County Airports System and the Federal Aviation Administration to ensure compatibility with flight safety rules and regulations. This coordination and resulting decisions will be summarized in future project-level CEQA documents.

Response to Comment LC5-17

Growth-inducing impacts are described in 4.22.4 of the Draft PEIR. The analysis focuses on the potential contribution of the DNA project to urban development in several areas (e.g., Railyards and Richards Boulevard) in the context of planned future land uses. Because the presence of transit stations may make nearby areas more accessible and this more attractive for development, the DNA line may help to shape the future land use patterns, but it is unlikely to stimulate more development in the Sacramento region. As described in Section 4.22.4 of the DNA PEIR, the general effects of growth that might be stimulated by the DNA project are those described in the EIRs for existing and planned developments. Therefore, additional analysis of the potential impacts of the DNA project on flood levels in the basin, as a result of increased surface runoff, is not necessary because the project does not induce growth beyond that which is analyzed in the Draft PEIR and the EIRs for existing and planned developments.

Response to Comment LC5-18

Safety and security impacts are described in Section 4.10, Public Safety and Security, of the Draft PEIR. Growth-inducing impacts are described in 4.22.4. The analysis focuses on the potential contribution of the DNA project to urban development in several areas (e.g., Railyards and Richards Boulevard) in the context of planned future land uses. Because the presence of transit stations may make nearby areas more accessible and this more attractive for development, the DNA line may help to shape the future land use patterns, but it is unlikely to stimulate more development in the Sacramento region. As described in Section 4.22.4 of the Draft PEIR, the general effects of growth that might be stimulated by the DNA project are those described in the EIRs for existing and planned developments, including public safety.

Response to Comment LC5-19

A discussion of the flood risk in Sacramento is provided on Pages 4.18-5 and 4.18-6 in Section 4.18, Water Resources, of the Draft PEIR. As stated in the Draft PEIR, the DNA project area in downtown Sacramento is designated by the Federal Emergency Management Agency (FEMA) as Zone X, an area protected from the base flood by the construction of a levee, dike, or other structural measure. Therefore, the area is not considered at risk for significant flood hazard as designated by FEMA.

In the Natomas Basin, the US Army Corps of Engineers (USACE) is moving forward with a Zone AR designation. As defined by FEMA, Zone AR designates a Special Flood Hazard Area formerly protected from the one percent annual chance of flood by a flood control system that was subsequently decertified and indicates that the former control system is being restored to provide protection from the one percent annual chance or greater flood. On September 27, 2007, FEMA denied an application from the City of Sacramento to designate the Natomas Basin Zone A-99, which denotes an area to be protected from one percent annual chance of flood by a Federal flood protection system under construction. The Sacramento Area Flood Control Agency is working with the City of Sacramento and the USACE to expedite work on the Natomas levee system. SAFCA has numerous projects under construction and in-planning in the Natomas area.

The Draft PEIR acknowledges the USACE's recent decertification of the Natomas levee system on page 4.18-6:

> "Recent local and federal studies; however, revealed that much more of the Natomas levee system is in need of repair, including erosion protection, seepage protection, and increased levee height. As a result of these studies, the USACE recently withdrew its endorsement of the Natomas levee system. SAFCA is prioritizing work efforts for areas and levees that are at higher risk to the 100-year flood event, but all levee improvement projects are being designed to the 200-year protection specifications."

The Draft PEIR is the first-tier of environmental review for the DNA project. The second phase of the DNA project, which includes the planned river crossing into South Natomas, is tentatively scheduled to commence planning in late 2010. The project-level environmental review required at that time will provide an opportunity to reassess the level of flood risk in the Natomas Basin and incorporate the conditions into project design.

Pages 4.18-8 and 4.18-9 of the Draft PEIR acknowledge the DNA project's potential impacts to American River hydrology and flood management:

> "Because of the importance of conveying flood flows through the American River system with minimum obstructions, scoping comments indicated the need to carefully consider how the proposed transit improvements on the DNA Corridor would affect American River hydrology or would otherwise interfere with flood management efforts. In response to this concern, several meetings were convened by SAFCA with local flood management specialists to advise the DNA study team of design objectives."

As a result of coordination with local flood management specialists, SAFCA provided recommendations to RT in a letter dated November 8, 2002. SAFCA's recommendations were incorporated into the program-level environmental review as described on page 4.18-9 of the Draft PEIR and included the consideration of the following hydrologic impacts:

- Change in floodway capacity (e.g., the ability of the river to safely convey major flood flows within the levee system) caused by placement of piers, abutments, or rock-covered banks (riprap), or by project-related changes in vegetation types;
- The ability of flood control structures and other infrastructure to safely withstand the impacts of a flood event;
- The ability of local, state, and federal flood management entities to safely and thoroughly inspect, maintain and operate the flood control infrastructure at all times of the year and under all weather conditions, including flood events; and

Specifically with regard to floodway capacity, SAFCA recommended the ability to bypass flows of up to 210,000 cubic feet per second (cfs) with negligible impairment. Subsequent to these recommendations, the conceptual bridge design options were evaluated using HEC-RAS, a hydrologic software application, for their impact on water surface elevation to the extent predictable at the current level of project development.

Response to Comment LC5-20

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of future stations. These assumptions will be revisited as the project moves into more detailed engineering and environmental studies. At that time, RT will coordinate with local governments to ensure consistency with local comprehensive plans, and with the Sacramento County Airports System and the Federal Aviation Administration to ensure compatibility with flight safety rules and regulations. This coordination and resulting decisions will be summarized in future project-level CEQA documents.

CI5-20

approval of the Greenbriar project. Attached are letters to the City on that project approval addressing the failure of the City to adequately assess and mitigate, and challenging the CLUP override. In addition, we do not believe that RT can avoid CEQA review and mitigation for a transit stop in the overflight zone.

CI5-21

Mixed Flow Lane Safety Impacts. Both Truxel Road and 7th Street present safety challenges that are not adequately addressed in the DPEIR. Mixed flow in the middle of a two way street poses major challenges for passenger safety as well as vehicle conflicts. The PEIR simply ignores these issues. Opponents have claimed that the segment on Truxel in South Natomas is not feasible due to these conflicts. The PEIR does not make the case that these impacts are fully assessed and mitigated.

CI5-22

It is also not clear what the flood risk is to the 7th Street alignment, particularly where it passes under the underpass.

CI5-23

Hydrologic impacts. The impact assessment and mitigation are deferred for impacts on the American River water surface elevation. The PEIR at 4-22.5 states:

> • For projects in the lower reaches of the American River with the potential to substantially affect the water surface elevation in the American River (e.g., by placing new piers or berms in the floodplain), hydrologic studies shall be conducted to address potential changes in a quantitative manner. Project proponents shall conduct these studies in consultation with SAFCA, the Reclamation Board, and other appropriate flood control officials. (page 8 of chapter 4-22)

We do not think it is appropriate to defer this analysis to a later project stage. Impacts should be known and mitigation understood before the program EIR is certified.

CI5-24

Biological Impacts

In general the DPEIR lacks specificity on both the impacts and the mitigation to be required.

We are particularly concerned that the direct and cumulative impacts of this project on the Natomas Basin Habitat Conservation Plan (NBHCP) and the operating program and conservation strategy of the Natomas Basin Conservancy. These impacts are not analyzed and not mitigated. As stated earlier, growth inducement at Greenbriar, and potentially growth inducement at other nearby sites that are not part of the NBHCP permit area, is a significant impact. While the DPEIR refers to this as yet unauthorized urbanization as "identified for future conversion to urban uses" (4.14.2) the fact is that the City has a binding agreement with state and federal wildlife regulatory agencies limiting that conversion. As noted above, RT is inducing this development with the promise of a light rail line to the site.

The effectiveness of the NBHCP Operating Conservation program is explicitly premised on the City's commitment to limit development to 17,500 acres (8,050 acres within the City's Permit Area, 7,464 acres in Sutter County, and 1,986 acres in Metro Air Park. The

Response to Comment LC5-21

Regional Transit, and other cities such as Los Angeles, Houston and others, have been operating light rail in two-way traffic for years without issue. However, the more detailed environmental analysis to be conducted with the next phases of development will identify any potential significant environmental impact that may occur with a light rail operation in a two-way street.

Response to Comment LC5-22

The description of potential flooding in the Downtown (MOS-1) project area is described in Section 4.18.2 of the Draft PEIR. The area has been determined to be protected from flood impacts by the presence of regional flood control facilities. Also see additional information in Response CI5-15, which describes continuing efforts to protect the Sacramento area from catastrophic flooding. Specific engineering details regarding drainage in the 7th Street undercrossing area will be addressed during the detailed project-level design phase for MOS-1.

Response to Comment LC5-23

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the resulting environmental impacts. These assumptions will be refined during future project-level engineering and environmental review. Because this is a program-level environmental review, RT believes that the analysis presented in the PEIR is sufficient to adequately characterize impacts to the environment at a level appropriate for a programmatic analysis. Detailed assessment of the hydrologic impacts to the American River water surface elevation will be conducted during future project-level environmental review of that phase of the DNA project.

Response to Comment LC5-24

The DNA PEIR discusses the Natomas Basin HCP in Section 4.14.1 and acknowledges potential effects on 7.4 acres of habitat in the Greenbriar area that is - as the commenter correctly notes - outside of the HCP boundary for covered activities (Impacts BIO-9, BIO-10, and BIO-11). The conclusion that the impacts would be less than significant (with Mitigation Measures consistent with the HCP) is based on the small amount of the impacted area relative to the remaining about of agricultural habitat in the Natomas Basin and the ability to use compensatory mitigation, such as habitat acquisition (either through the HCP or independently).

At this time, RT believes that this analysis is adequate and that no additional analysis is necessary to determine potential conflicts with the Natomas Basin HCP. In addition, RT believes that it is unlikely that additional analysis will be necessary during future, project-level design and environmental review, and it is possible that specific implementation of the mitigation measures may be unnecessary. Even if the Greenbriar project is not developed (which would obviate the need for the mitigation measures), further improvements to Metro Air Park are likely to include the extension of Meister Way across the Greenbriar property to connect to the new SR-99 overcrossing into North Natomas (MTP Project SAC23810).

With regard to growth inducement, please refer to the response to Comment CI5-14.

NBHCP, EIR/EIS, and other decisive documents rely upon the assumption that the rest of the Basin will remain in agriculture and continue to provide habitat values for threatened Giant Garter Snake (GGS) and Swainson's Hawk (SWH), without conservation and/or agriculture easements in place. The Federal District Court, in an opinion by Judge David Levi, construed the effect of these provisions in its decision upholding the 2003 NBHCP, September 8, 2005, as follows:

"...the Service and those seeking an ITP (Incidental Take Permit) in the future will face an uphill battle if they attempt to argue that additional development in the Basin beyond 17,500 acres will not result in jeopardy," pointing out that the HCP, Biological Opinion, Findings, and EIR/EIS are predicated on the assumption that development will be limited to 17,500 acres and the most of the remaining lands will remain in agriculture during the 50-year Permit Term. (pg. 30, ftnt 13, of the Opinion),

At pg. 22 ftnt 10, of the Opinion, the Court states that:
"...while plaintiffs contend that future development will vitiate the NBHCP, it is more likely that, if future development in the [Sacramento] County will have this effect, the Secretary will decline to issue ITP's for development in [Sacramento] County or will insist on mitigation that may be considerably greater than required by the NBHCP."

The City in the Natomas Basin Habitat Conservation Plan and in the Implementation Agreement that it signed with the wildlife regulatory agencies agreed to do an effects analysis and fully mitigate for all impacts on the NBHCP and the operating program of the Natomas Basin Conservancy for any future development in the Basin. The City has not achieved agreement with the wildlife regulatory agencies about those effects and mitigations for the Greenbriar project. To quote from the wildlife agencies' letter:

"The Effects Analysis and proposed conservation strategy in the DEIR were created with little input from the Wildlife Agencies and have not been evaluated by the Wildlife Agencies to determine their consistency with Federal and State Endangered Species Act requirements or their effects on the efficacy of the NBHCP." and

"Future development in the basin will require a new conservation strategy that is developed with input and review from the Wildlife Agencies, to address these impacts."

[US FWS and CDFG September 5, 2006 letter entitled "Comments on the City of Sacramento's July 2006, Draft Environmental Impact Report for the Proposed Greenbriar Development Project, Sacramento County, California"]

DNA would have a significant impact on biological resources if it "conflicts with the adopted long-term wildlife or habitat conservation goals of affected parks, wildlife refuges, or approved habitat conservation plans." (4.14.3) The DPEIR lacks substantial evidence that it would not conflict with the NBHCP.

CI5-24

CI5-25

American River Parkway. ECOS continues to be very concerned about the destruction of scarce remaining riparian habitat and wetlands in the American River Parkway as a consequence of this project, and specifically the bridge structure.

The DPEIR claims that disturbance of 2 acres of Swainson's Hawk foraging habitat during construction would be less than significant. We think this is a significant impact. In addition to the nesting pair identified in the DPEIR on the Sacramento River west bank at the confluence, there is at least one known nesting site just east of the project site. The DPEIR relies on data gathered in August 2002 but the Department of Fish and Game has up to date nesting site maps. The DPEIR fails to identify nesting sites within one mile that would be affected by construction activity and loss of foraging.

CI5-26

Nor do we accept the DPEIR conclusion that "the loss of riverbed and streamside vegetation resulting from project construction is not expected to jeopardize the survival and recovery of listed fish species or adversely modify critical habitat for these species (Impact BIO 8). As a result, this impact would be less than significant." The critical location of this project and the fragile condition of threatened and endangered aquatic life in the Sacramento and American Rivers suggest that the impacts would be significant. There is no evidence that the regulatory agencies consider the project impacts to be less than significant.

CI5-27

Likewise, the DPEIR is deficient in not consulting with and disclosing what Fish and Wildlife and Fish and Game assessment of the impacts of the crossing of Lone Tree Canal on Giant Garter Snake will be. Again, this is not just an issue of "take" but also an issue of the interference or conflict with an existing habitat plan and the connectivity between habitat preserves that are mitigating for impacts of prior development in the Basin.

CI5-28

Mitigation. The Mitigation program is replete with vague and "deferred mitigation," contrary to the California Environmental Quality Act. The mitigation program must be of sufficient detail to permit full identification of the costs of mitigation to be included in the project funding. This DPEIR does not provide the information necessary to understand what mitigation measures will be needed and what the costs will be.

Additional unspecified mitigation measures. The DPEIR refers in numerous places to additional mitigation as required by various regulatory agencies. It does not disclose to the public what impacts and what mitigation will be.

Tree planting (MBIO7). One kind of deferred mitigation is any use of fees to mitigate. For example in the case of the tree mitigation, payment of a fee to the County is not adequate mitigation since the county program cannot be relied upon to complete the mitigation. One of the barriers to effective mitigation for tree loss is that land suitable for planting replacement trees is very difficult to acquire. RT's mitigation for tree loss should occur as part of its project and be conducted to ensure replacement trees survive. The site for mitigation should be secured prior to the initiation of the project.

Response to Comment LC5-25

Table 4.14-1 in the Draft PEIR identifies 1.949 acres of ruderal/grassland habitat within a 100-foot construction corridor in the American River Parkway, and the accompanying text identifies this as an impact to Swainson's hawk foraging habitat (Impact BIO-2). Although this acreage would be lost during construction, most of it would become available again following the completion of construction activities and restoration of the disturbed areas. Other nearby foraging areas are available nearby (see ruderal/grassland areas in Figure 4.14-3). For these reasons, RT believes that the impacts to foraging habitat within the American River Parkway would be less-than-significant.

In addition to foraging habitat within the American River Parkway, the Draft PEIR discusses the loss of 7.4 acres of agricultural land on the Greenbriar property - also Swainson's hawk foraging habitat. See Response to Comment CI5-24 with regard to habitat impacts on the Greenbriar property.

Nesting impacts also are discussed in Section 4.14, Biological Resources, of the Draft PEIR. Although Impact BIO-3 discusses potential impacts to nesting hawks in the American River Parkway, the corresponding mitigation measure (MBIO-3) was intended to apply to all portions of the DNA project. RT agrees with the commenter that there are many other Swainson's hawk nests in the general project area, including several that are likely to occur within a mile of the construction area - 45 active Swainson's hawk nesting territories were identified in the Natomas Basin Conservancy's 2006 Annual Survey Results. PEIR text (p. 4.14-15) has been modified as recommended to make MBIO-3 more inclusive. Refer to Chapter 4, Errata, of the Final PEIR.

Response to Comment LC5-26

Impacts to aquatic habitat and species are described as Impacts BIO-6 (direct mortality of special-status fish), BIO-7 (loss of shaded riverine aquatic habitat), and BIO-8 (loss of critical habitat). The conclusion of Impact BIO-8 is based on the conclusions of Impacts BIO-6 and BIO-7 - direct mortality can be avoided and minimized by the specific construction processes described in MBIO-6, and loss of shaded riverine aquatic habitat can be compensated by the avoidance, minimization, and mitigation measures described in MBIO-7 (and MBIO-1). RT believes that the impacts and feasible mitigation measures are appropriately described. Because of the programmatic nature of the analysis, regulatory permit applications are premature. Additional agency consultation will occur at the time the river crossing is carried forward for detailed project-level design and construction.

Response to Comment LC5-27

As described above, detailed agency consultation will occur during the project-level design phase. RT agrees that restricting giant garter snake movement along a critical migration corridor would be a significant impact (please refer to Impact BIO-10 on page 4.14-14 of the Draft PEIR), and has proposed mitigation measures to ensure that project design will maintain the corridor (please refer to MBIO-10 on page 4.14-16). RT believes that this is an adequate characterization of potential impacts, including feasible mitigation. In addition, please refer to response to Comment CI5-24 regarding the Natomas Basin HCP.

Response to Comment LC5-28

RT does not believe that the Draft PEIR contains vague and deferred mitigation. The document effectively analyzes potential impacts to the degree possible given that only conceptual design information is available (appropriate for a Programmatic EIR) and proposes specific mitigation measures to avoid, minimize, or otherwise mitigate the impacts (if possible) to a less-than-significant level. The commenter specifically refers to Mitigation Measure MBIO-7. With regard to tree planting, MBIO-7 refers back to MBIO-1. Neither MBIO-1 nor MBIO-7 discusses paying tree mitigation fees to the County. MBIO-1 states that RT must compensate for the permanent loss of riparian forest by restoring the equivalent functional habitat value (to be determined during project-level evaluation following detailed design) within the American River Parkway. MBIO-1 further states that mitigation should occur on the Urrutia property (if available) or on other nearby sites that are suitable for restoration (“Category 2” sites). In addition, these requirements are only to be followed after the detailed design effort “route[s] the DNA project to avoid as much riparian forest and willow-cottonwood scrub as possible (page 4.14-14).”

At this time, RT is actively working with the County of Sacramento, the City of Sacramento, and the Sacramento Area Flood Control Agency to explore options to participate in the Urrutia property acquisition. This is well in advance of when this activity would typically occur - the final calculation of the affected area and habitat value cannot occur until detailed project-level design information is available - because RT desires to be proactive in confirming its mitigation program in order to facilitate the implementation of the DNA project.

Downtown Natomas Airport

Draft Program Environmental Impact Report

Downtown/Natomas/Airport Corridor Project
Draft Program Environmental Impact Report

Comment Card

Please provide your comments on the Downtown/Natomas/Airport Corridor Draft Program Environmental Impact Report (PEIR) below for inclusion and consideration in the Final PEIR. *All comments must be submitted no later than Tuesday, February 26, 2008 by 5:00 p.m.* Include additional pages as needed.

Dear SACRT:

Having read over the corridor Draft Program Impact Report, I fully support the expansion of the light rail service..

Though this program will cause some inconveniences I1-1 the short term, I believe it is vital for the long the quantity of travel that this area will need to support as well as the quality of life that it will have on residents, workers and visitors.

Thank you for allowing the opportunity to comment.

Submitted By:

Name: Nico Forte

Address: 1431 Q St., #312

Sacramento CA 95811

Phone Number: 9581

E-mail: NicoForte@gmail.com.

DUE: Tuesday, February 26, 2008 by 5:00 p.m.

You may submit written comments to the comment table this evening or to the address below by mail, fax or e-mail:

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

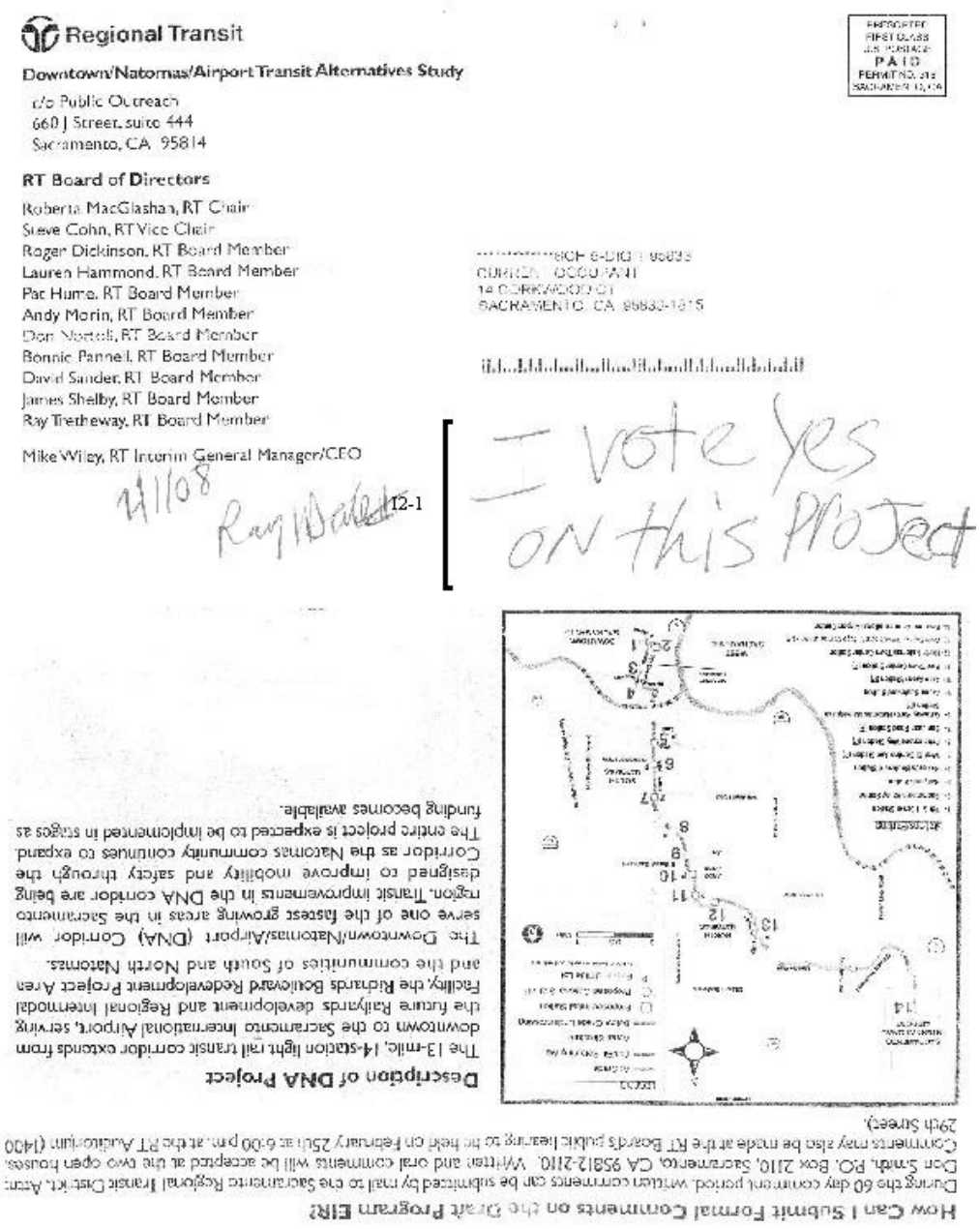
Phone:916-556-0506 | Fax: 916-444-2156
dsmith@sacrt.com

Letter I1. Nico Forte

Response to Comment I1-1

Thank you for your comment. RT appreciates your support for the project.

Letter I2. Ray Dale



Regional Transit

Downtown/Natomas/Airport Transit Alternatives Study

c/o Public Outreach
660 J Street, suite 444
Sacramento, CA 95814

RT Board of Directors

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I vote yes on this Project

11/08 Ray Dale I2-1

Description of DNA Project

The 13-mile, 14-station light rail transit corridor extends from downtown to the Sacramento International Airport, serving the future Railyards development and Regional Intermodal Facility, the Richards Boulevard Redevelopment Project Area and the communities of South and North Natomas.

The Downtown/Natomas/Airport (DNA) Corridor will serve one of the fastest growing areas in the Sacramento region. Transit improvements in the DNA corridor are being designed to improve mobility and safety through the Corridor as the Natomas community continues to expand. The entire project is expected to be implemented in stages as funding becomes available.

How Can I Submit Formal Comments on the Draft Program EIR?

During the 60 day comment period, written comments can be submitted by mail to the Sacramento Regional Transit District, Attn: Don Smith, P.O. Box 2110, Sacramento, CA 95812-2110. Written and oral comments will be accepted at the two open houses. Comments may also be made at the RT Board's public hearing to be held on February 25th at 6:00 pm, at the RT Auditorium (1400 29th Street).

Response to Comment I2-1

Thank you for your comment. RT appreciates your support for the project.

Don Smith - Re: Comments on DNA

From: Don Smith
To: cmazz@surewest.net
Subject: Re: Comments on DNA

Thank you for your comments on the DNA PEIR.

>>> <cmazz@surewest.net> 2/20/2008 8:18 PM >>>
Dear Mr. Smith,

I3-1 The DNA Corridor Project is a bad idea for the Natomas Community. Before RT destroys the community, it would better serve by improving existing service.

I3-2 The DNA line would only increase congestion along Truxel Road.

Regards,
Chris Mazzarella
1565 Danica Way
Sacramento, CA 95833
(916) 923-3613

Letter I3. Chris Mazzarella

Response to Comment I3-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

The Transit Master Plan update work program that is underway will seek ways to improve service throughout the region. One task requires the consultant team to review overall service to see if efficiencies can be found that can be used o provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions.

Response to Comment I3-2

Some intersections in the study area would experience decreased delay times with the project, while other intersection would experience increased delay times. The transportation analysis on page 3-54 of the Draft PEIR acknowledges intersections that would have significant traffic impacts requiring mitigation.

Sacramento Regional Transit District
Attn: Don Smith, P.O. Box 2110
Sacramento, CA 95812-2110

Dear Don Smith & Board of Directors,

Thank you for sending out the flyer inviting the residents of Natomas to voice our opinions.

I live two blocks from Truxel in South Natomas and as both a resident and an experienced Realtor I have very strong opinions about how light rail will affect the home values in this area.

I4-1 Running light rail across the park and up Truxel in South Natomas will destroy our community. This is an established residential community with homes that have two and three car garages. We are five minutes to downtown and those who need or prefer to take public transportation can take the bus.

I4-2 Adding another bridge across the park will also have a negative impact on the park where we go to have picnics, ride bikes and enjoy the river.

I4-3 It is not difficult to see the negative impact that light rail has had on Arden Way by Del Paso Blvd., or how light rail has effected the home values along Folsom Blvd. It is loud and dirty and would bring people into our neighborhood that don't live here and have no reason to be here.

I understand that having a light rail system run from downtown out to the airport is a necessary improvement and giving downtown residents a quick and easy way to get to North Natomas and take advantage of the shopping centers in this area is also important to the local economy.

I4-4 My recommendation is to run light rail up Northgate Blvd. from downtown. Light rail already crosses the river there and meets Northgate before it hits Del Paso. There would be no need for an additional bridge over the park since Northgate runs over the American River Parkway. Northgate needs revitalization, there are commercial properties all along it that are in need of more business and have space in front of them that could be used for the light rail system with a choice of vacant lots that could be purchased for parking. The residential properties along Northgate are for the most part older homes many of whom have one car garages and whose owners and tenants would be more likely to use light rail to get to work and go shopping. These homes do not sit directly in the path of the train so they would not need to be moved. By running the train up Northgate it would actually increase the value of the homes in that area, making them more desirable to those people who are thinking of purchasing older homes downtown. These people normally are happy to buy a smaller older home in a more convenient spot in order to have downtown access and will usually remodel their homes, thus improving an area that has fallen into disrepair and developed a poor reputation.

From Northgate it would be easy to run across 80 to N. Market or N Freeway Blvd. over to Truxel and along the proposed route. I believe this would be a much more cost effective and useful route.

I hope you will consider the points I have addressed and change your route.

Sincerely, Eve Abrahams

Letter I4. Eve Abrahams

Response to Comment I4-1

Regarding concerns that the light rail will destroy the community of South Natomas, Supervisor Dickenson, who was on the Regional Transit Board when the initial light rail line was constructed in 1987, told a story at our February 11, 2008 Open House meeting about how some of the neighbors in the vicinity of the light rail line and 39th street were concerned about the station being located near their homes. Regional Transit responded by removing the station from the system plans. A couple of years after light rail service began, the same people who opposed the station were asking RT to reconsider and build a station. The station was eventually built and there have been no complaints.

With regard to property values, the factor that has the most direct effect on this is proximity to light rail. Work undertaken by David Boyce and Arthur Nelson, or Professors Robert Cervero and John Landis, as reported at the Transportation Research Board in 1995 or as published in the "Urban Land" magazine in 2002, indicates that residential property values increase by over 25 percent with proximity to light rail transit when compared with residences further away from transit. This is a significant and proven economic development effect of light rail that was borne out in RT's own study of property values near transit. This study was performed by Booz-Allen Hamilton.

Response to Comment I4-2

As described in Section 4.9, page 4.9-12, of the Draft PEIR, park users would be temporarily affected by construction activities, including the movement of heavy equipment on park roads, restricted access, and temporary closure of some park properties, noise, dust, and other inconveniences associated with the construction of the American River crossing. Construction activities also would degrade the visual character of the park and disrupt passive activities such as bird watching, hiking, jogging, and use of the archery range. Joggers, walkers, and bicyclists would need to be rerouted safely around the construction site. These temporary disruptions would impair enjoyment of the American River Parkway on a temporary basis. However, implementation of Mitigation Measure MPARK-1 (as proposed in Section 4.9, page 4.9-14) would reduce temporary construction impacts in the American River Parkway and Discovery Park to a less-than-significant level.

Operational impacts of the DNA project are presented in Section 4.9, page 4.9-13, of the Draft PEIR. Operation of the DNA project would require that 1.8-acres of the American River Parkway be dedicated as permanent transit right-of-way. However, all of the underlying area would be available for public use with the exception of the space required for the bridge piers. Additionally, the bridge would not present a barrier to pedestrians, hikers, bicyclists, or boaters. Park users would be permanently and directly affected by a visual impact and a new source of noise related to the operation of the trains passing over the American River Parkway. While a bridge would result in a high visual intrusion into the natural aesthetics of the park, these effects would be limited to a small portion of the park (135 feet on either side of the bridge alignment) where park users would be exposed to noise levels exceeding the threshold limit of 57 dBA for a potential noise impact.

However, noise control measures would be implemented to ensure that noise levels during operation would not exceed the calculated levels. These noise control measures are described in detail in Section 4.13, page 4.13-11, and include project design of the aerial guideway, track turn radius, and track and wheel maintenance.

Response to Comment I4-3

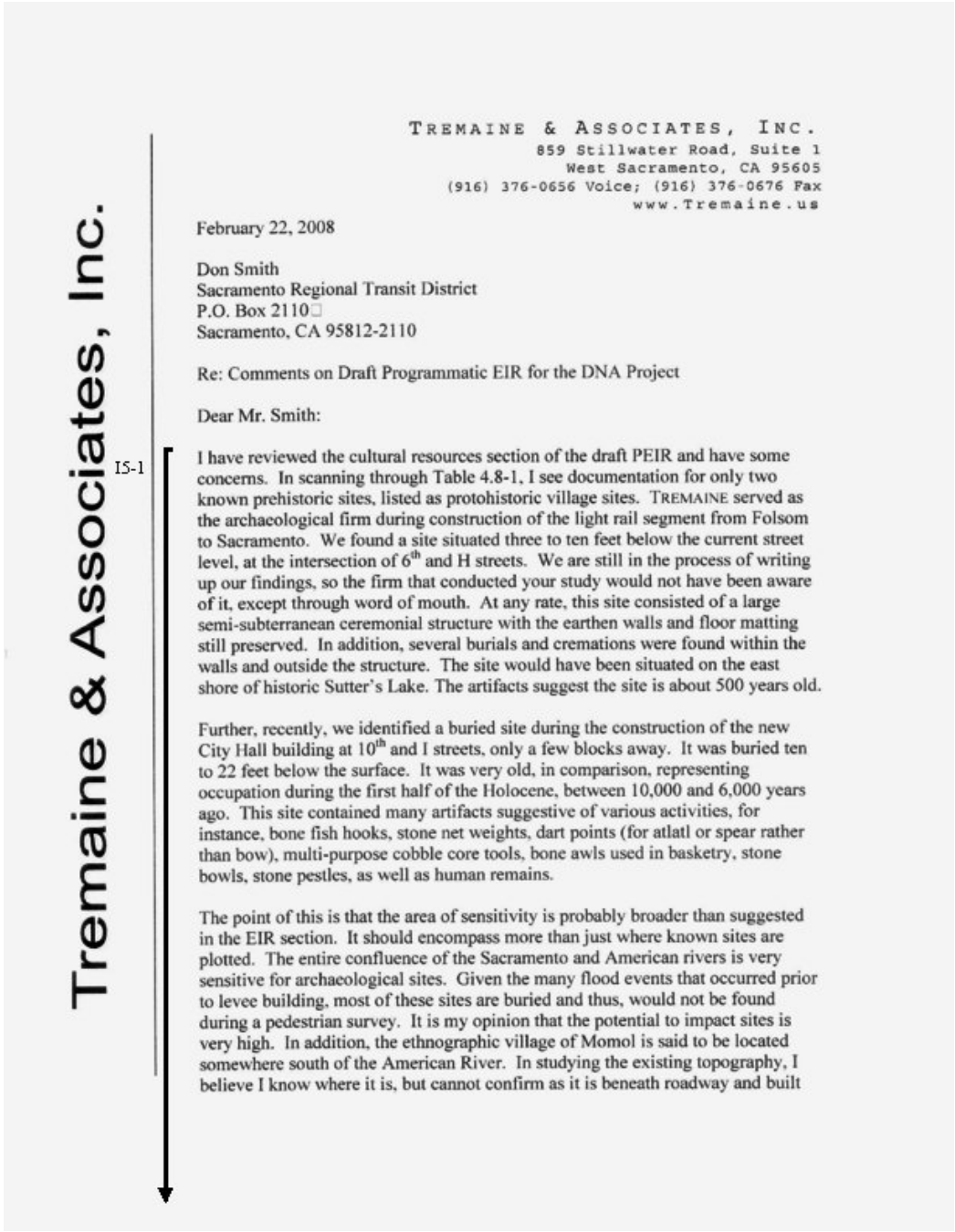
The conditions of the Arden-Del Paso area are not due to the light rail, but rather to prior non-investment in the area. Since the inception of the light rail, the City has undertaken significant investment in the streets to make it easier for the residents there to take advantage of the light rail service and more investment is following. Without light rail the street improvements may well have been made elsewhere. Light rail is far from being loud and dirty, in fact, the light rail system has been accused of being too quiet - posing a risk to pedestrians and bicyclists who cannot hear the trains approaching until they are too close. RT has worked very hard to develop safety strategies to protect pedestrians and others along the right-of-way. The light rail also uses electric power, which avoids all of the pollutants out into the air by cars and trucks.

Response to Comment I4-4

This comment regarding the potential alignment of the DNA project along Northgate Blvd was forwarded to RT by Supervisor Dickenson. This alignment was studied in 2001, in the original Alternatives Analysis that produced the current LPA along Truxel Rd (included as Appendix A in the PEIR). In the AA, the Northgate alignment was shown to reduce the construction costs only fractionally because the river crossing would have to be rebuilt. The operating costs of the Northgate alignment would have been higher, the distance to the airport would have been longer, and the line would have served far fewer business and apartment residences. Thus, the line's cost-effectiveness would have been much reduced. As it is, the Truxel Road alignment will serve many businesses, schools, the public library, and several apartment developments that would no be served by keeping the light rail in industrial areas.

As far as potential taking of property is concerned, RT is operating under the direction of their Board of Directors, including the instruction not to take any residential property to facilitate this project. The alignment along Truxel Road is therefore specifically designed to avoid the taking of residential properties.

Letter I5. Kim Tremaine



Tremaine & Associates, Inc.

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February 22, 2008

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

Re: Comments on Draft Programmatic EIR for the DNA Project

Dear Mr. Smith:

I5-1

I have reviewed the cultural resources section of the draft PEIR and have some concerns. In scanning through Table 4.8-1, I see documentation for only two known prehistoric sites, listed as protohistoric village sites. TREMAINE served as the archaeological firm during construction of the light rail segment from Folsom to Sacramento. We found a site situated three to ten feet below the current street level, at the intersection of 6th and H streets. We are still in the process of writing up our findings, so the firm that conducted your study would not have been aware of it, except through word of mouth. At any rate, this site consisted of a large semi-subterranean ceremonial structure with the earthen walls and floor matting still preserved. In addition, several burials and cremations were found within the walls and outside the structure. The site would have been situated on the east shore of historic Sutter's Lake. The artifacts suggest the site is about 500 years old.

Further, recently, we identified a buried site during the construction of the new City Hall building at 10th and I streets, only a few blocks away. It was buried ten to 22 feet below the surface. It was very old, in comparison, representing occupation during the first half of the Holocene, between 10,000 and 6,000 years ago. This site contained many artifacts suggestive of various activities, for instance, bone fish hooks, stone net weights, dart points (for atlatl or spear rather than bow), multi-purpose cobble core tools, bone awls used in basketry, stone bowls, stone pestles, as well as human remains.

The point of this is that the area of sensitivity is probably broader than suggested in the EIR section. It should encompass more than just where known sites are plotted. The entire confluence of the Sacramento and American rivers is very sensitive for archaeological sites. Given the many flood events that occurred prior to levee building, most of these sites are buried and thus, would not be found during a pedestrian survey. It is my opinion that the potential to impact sites is very high. In addition, the ethnographic village of Momol is said to be located somewhere south of the American River. In studying the existing topography, I believe I know where it is, but cannot confirm as it is beneath roadway and built

Response to Comment I5-1

Thank you for your comment. This information will be very useful during project-level engineering and environmental review of MOS-1 to evaluate potential cultural impacts and refine mitigation measures. In addition, based on this information and RT's recent experience with the Amtrak-Folsom extension in the Downtown area, Mitigation Measure MCUL-7 has been revised to include mandatory construction monitoring in sensitive areas by trained professionals (PEIR text (p. 4.8-12) has been modified. Refer to Chapter 4, Errata, of the Final PEIR). Based on the analysis in the PEIR and the information provided by the commenter, RT believes these sensitive areas to include all areas south of the American River and the river crossing itself. With regard to other areas, however, the revised mitigation measure is not specific about which areas require monitoring. Focused, project-level analyses will be performed for each stage of the DNA project. Each project-level CEQA document will update the analysis and recommend mitigation measures that apply Mitigation Measure MCUL-7 to other project areas.

areas. The preferred alternative would bisect this location. Further, the ethnographic village of Pusune is located on the north side of the American River near its confluence with the Sacramento River. Its exact location is not known. The sensitivity, especially on adjacent both sides of the American River is very strong.

With this in mind, I believe the mitigation measure specified in the Draft PEIR is inadequate. It is not sufficient to require the construction contractor to contact an archaeologist should resources be discovered. Construction crew do not have skilled eyes for spotting site constituents. Furthermore, while some "training" may be provided them, construction folks are engaged in conducting their own work. If there isn't someone fully devoted to examining spoils and trench profiles, a site could easily be cut through and damaged without their noticing. Thus, to ensure protection of these potential resources, archaeological monitoring should be required in sensitive zones. In other places, where sensitivity for resources is probably much lower, for instance, where the preferred alternative crosses historic Fisherman's Lake in the Natomas area, archaeological spot-checking might be more appropriate rather then full time monitoring.

I5-1

Best Regards,

Kim Tremaine

Kim Tremaine, Ph.C., RPA
Principal

Letter I6. James Morgan

James Morgan
9459 Alcosta Way
Sacramento, CA 95827
February 24, 2008

Sacramento Regional Transit District
Attn: Don Smith
P.O. Box 2110
Sacramento, CA 95812-2110

Re: Downtown/Natomas/Airport Corridor Draft Program Environmental Impact Report

Mr. Smith:

These are my comments in response to the Downtown/Natomas/Airport Corridor Draft Program Environmental Impact Report (EIR).

I6-1 The proposed extension of light rail to Natomas and the Sacramento Airport would require a bridge across the American River and Parkway that would have adverse effects upon the Parkway. These include short term and long term loss of riparian habitat and recreational areas as noted in the draft EIR. In addition, adverse effects of visual intrusion and noise would occur that are NOT noted in the draft EIR. The Parkway is first and foremost a naturalistic open space area around the river. The presence of a light rail bridge would significantly degrade the naturalistic character of the Parkway in the vicinity of the bridge. Noise from passing trains will carry a substantial distance, and further degrade the naturalistic character of the Parkway.

I6-2 The draft EIR is particularly deficient in failing to identify growth-inducing impacts of the proposed light rail extension. Besides passive impacts of improved transportation, Regional Transit and the local governments have policies fostering "transit oriented development." This includes very high-density housing, generally of 20 or 30 dwelling units per acre and up, and high density mixed use. As an example, at the Butterfield station, there are efforts underway to convert the existing park-and-ride lot to high-density housing. These changes would have significant impacts upon the existing communities in Natomas. In addition, the Natomas area is a deep flood plain. In a moderately large storm, a levee break along the American or Sacramento Rivers could result in flooding up to 20 feet deep. Inducing more growth in Natomas would put more people at risk of catastrophic flooding.

I6-3

Thank you for your consideration of these comments.

Sincerely,

James Morgan

James Morgan

Response to Comment I6-1

The DNA project's adverse effects of visual intrusion and noise in the American River Parkway are acknowledged in the Draft PEIR in Sections 4.11 and 4.13. As stated on page 4.9-13 of the Draft PEIR, "Additionally, park users would be permanently and directly affected by a visual impact and a new source of noise related to the operation of the trains passing over the American River Parkway (refer to Section 4.13, Noise and Vibration, and Section 4.11, Visual and Aesthetic Resources)."

While a bridge would result in a high visual intrusion into the natural aesthetics of the park, these effects would be limited to a small portion of the park (135 feet on either side of the bridge alignment) where park users would be exposed to noise levels exceeding the threshold limit of 57 dBA for a potential noise impact. However, noise control measures would be implemented to ensure that noise levels during operation would not exceed the calculated levels. These noise control measures are described in detail in the Draft PEIR, Section 4.13, page 4.13-11, and include project design of the aerial guideway, track turn radius, and track and wheel maintenance.

Response to Comment I6-2

Growth-inducing impacts are described in 4.22.4. The analysis focuses on the potential contribution of the DNA project to urban development in several areas (e.g., Railyards and Richards Boulevard) in the context of

planned future land uses. The commenter correctly notes that the analysis does not specifically include a discussion of transit-oriented development (TOD), which is provided in this response.

Regional Transit generally supports the concept of transit-oriented development, which includes increased housing densities and mixed use in the vicinity of transit stations. More people living within walking distance of a transit station can increase ridership, and reduce parking requirements, which may enhance the cost-effectiveness of the transit project. Through its Transit for Livable Communities (TLC) program, RT has participated in several redevelopment projects that have incorporated TOD principles. These have included the 65th Street Station area revitalization project (together with CSU Sacramento), and efforts are underway to participate in TOD projects near the Butterfield and Meadowview stations. In the DNA corridor to date, RT has participated in the planning of the Township 9 project on Richards Boulevard, and has commented extensively on various development proposals in North Natomas (e.g., Promenade) to encourage the maintenance of residential densities and other transit-supportive land uses. In addition, RT has supported the approval of the Greenbriar project (please refer to response to Comment CI5-14). It should be noted, however, that land use planning and regulation falls under the purview of local jurisdictions and that RT's role is strictly advisory.

RT will continue to support TOD in the DNA corridor. Opportunities to encourage more concentrated development where there is substantial redevelopment (e.g., Railyards and Richards Boulevard) or on undeveloped land (e.g., Greenbriar and limited areas of North Natomas). South Natomas is less likely to be affected because of its mature, developed character.

Because the presence of transit stations may make nearby areas more accessible and thus more attractive for development, the DNA line may help to shape the future land use patterns, but it is unlikely to stimulate more development in the Sacramento region. As described in Section 4.22.4 of the DNA PEIR, the general effects of growth that might be stimulated by the DNA project are those described in the EIRs for existing and planned developments. The encouragement of transit-oriented development might alter the previously described impacts because densities could be higher than expected at the time the EIRs were certified. At this time, specific effects of higher-than-expected housing densities cannot be determined because no specific TOD projects are underway. Specific effects would be examined on a case-by-case basis as the City considers individual development projects.

Response to Comment I6-3

In the Natomas Basin, the US Army Corps of Engineers (USACE) is moving forward with a Zone AR designation. As defined by FEMA, Zone AR designates a Special Flood Hazard Area formerly protected from the one percent annual chance of flood by a flood control system that was subsequently decertified and indicates that the former control system is being restored to provide protection from the one percent annual chance or greater flood. The Sacramento Area Flood Control Agency is working with the City of Sacramento and the USACE to expedite work on the Natomas levee system. SAFCA has numerous projects under construction and in-planning in the Natomas area. The Draft PEIR acknowledges the USACE's recent decertification of the Natomas levee system on page 4.18-6:

> "Recent local and federal studies; however, revealed that much more of the Natomas levee system is in need of repair, including erosion protection, seepage protection, and increased levee height. As a result of these studies, the USACE recently withdrew its endorsement of the Natomas levee system. SAFCA is prioritizing work efforts for areas and levees that are at higher risk to the 100-year flood event, but all levee improvement projects are being designed to the 200-year protection specifications."

The Draft PEIR is the first-tier of environmental review for the DNA project. The future project-level environmental review required for the individual phases of the DNA project will provide an opportunity to reassess the level of flood risk in the Natomas Basin and incorporate the conditions into project design.

In addition, please see response to Comment I6-2.

Letter I7. James B. Wiley

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February 25, 2008

Sacramento Regional Transit District
Attention: Don Smith
P.O. Box 2110
Sacramento, CA 95812-2110

Re: Draft Project EIR for Downtown/Natomas/Airport Corridor

Dear Mr. Smith:

Taylor & Wiley represents Opus West Corporation with respect to their property known as The Promenade, located at the corner of Truxel Road and Gateway Park Boulevard. The purpose of this letter is to provide comments on the Draft Program Environmental Impact Report (DPEIR) for the Downtown/Natomas/Airport Corridor ("Project"). Specifically, as discussed in more detail below, our concern relates to the lack of MOS-1 incorporating a Park-and-Ride facility in North Natomas near I-80.

I7-1

Page ES-12 of the DPEIR notes that the Project has fewer Park-and-Ride parking spaces than described in the DNA ridership forecasting model. The DPEIR also notes that despite a projected increase in parking demand within Sacramento, "physical constraints" of available property have limited the number of feasible parking spaces. The DPEIR identifies two potentially significant impacts associated with inadequate Park-and-Ride facilities: Impact Tran-17 (p. ES-31) and Impact Com-1 (p. ES-32). Both indicate potentially significant impacts to surrounding neighborhoods due to parking overflow.

Additionally, the DPEIR states on page 3-26, "Limitations on the number of parking spaces [has] a direct relationship on transit ridership due to the actual Park-and-Ride demand exceeding available space in the Richards [Boulevard] area." The DPEIR further notes on page 3-43 that the Project's lower Park-and-Ride availability in the South Natomas area will not adversely affect overall transit ridership where the parking "spill-over" demand is satisfied in North Natomas next to I-80.

Response to Comment I7-1

MOS-1 does not include park-and-ride spaces north of the end of the line station at Richards. Financial constraints currently preclude RT from adding such parking and operating a shuttle service as part of the MOS-1 project.

However, despite a stated need for parking, current plans for MOS-1 do not include any Park-and-Ride facilities in North Natomas next to I-80. Rather, parking is limited to a lot "near the Richards Boulevard station west of the intersection of North B and North 7th Streets." (p. ES-14.) This limited parking certainly will not relieve any "spill-over" and would result in increased costs in implementing the mitigation of carrying out parking enforcement programs in the area. Furthermore, based on the district's analysis, such limited parking may result in decreased ridership in the MOS-1 segment, thereby inhibiting revenue generation.

For these reasons, the Sacramento Regional Transit District should incorporate into MOS-1 the development of the Park-and-Ride lot at the corner of Truxel Road and Gateway Park Boulevard (350 spaces already designated on the Opus Site) and provide shuttle service from that lot to the Richards Boulevard light rail stop, thereby relieving the parking shortage, diminishing the impacts of overflow parking, establishing transit commute patterns for the future and maintaining the maximum ridership forecasted for the MOS-1 segment. Benefit would also derive from the fact that the lot would not be temporary, but a long-term purchase incorporated into the eventual expansion of the corridor into the North Natomas area. Lastly, the Park-and-Ride facility proposed for this corner has already undergone CEQA review as part of The Promenade project and is therefore easily incorporated into the current MOS-1 segment.

I7-1

Thank you for the opportunity to provide our comments on the DPEIR. Please feel free to call if you have any questions or need further information regarding our comments.

Very Truly Yours,

James B. Wiley

Cc: Mike Wiley
Fred Arnold
Tom Schaal

SABA

February 26, 2008

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

Subject: Draft Program Environmental Impact Report for the Downtown/Natomas Airport Corridor

Dear Mr. Smith

Thanks for the opportunity to make comments.

We have reviewed the EIR, and find that it could be strengthened by additional discussion of the environmental impacts related to bicycling and bicyclists. We provide several recommendations to mitigate the impacts to bicyclists of the proposed development, and to capitalize on opportunities that are presented by the new light rail line. We also note there is missing information regarding bikeways.

I8-1

There are a number of issues that are not addressed in the Draft Program Environmental Impact Report. These issues represent both opportunities to improve bicycle and pedestrian circulation and increase bicycle use as well as negative impacts affecting bicycle use. Improvements in bicycle pedestrian circulation will result in air quality benefits and reductions in greenhouse gas emissions.

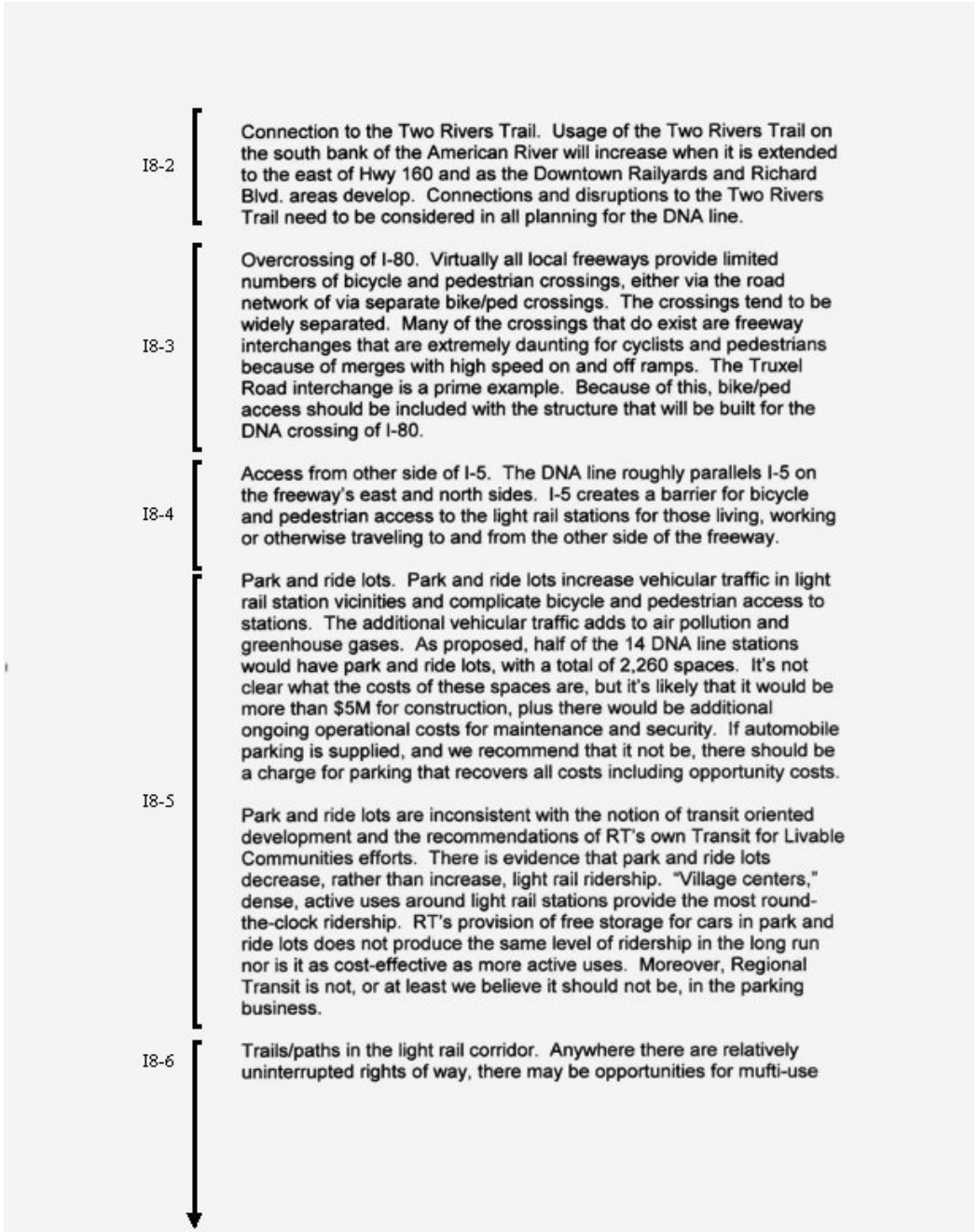
We recommend updating the Bike and Trail Facility map shown in Figure 3.2.1. The map does not show the following:

the Two Rivers Trail on the south bank of the American River
the bike path on the west side of the I-5 corridor between Del Paso Road and San Juan Road
the bike path on the west edge of the Natomas Crossing development
the Ueda Parkway trail (though this trail may be just outside the study area)

Letter I8. Walt Seifert

Response to Comment I8-1

The purpose of the Draft PEIR is to disclose environmental impacts in accordance with CEQA law. While RT and the project are supportive of bicycle and pedestrian transportation, the document is not intended as a mechanism to identify and explore means to improve bicycle and pedestrian circulation in general. Rather, it measures the effects of the project, as proposed, on bicycle and pedestrian circulation, among many other issues. Impacts are determined based upon the standards of significance described in the document (please refer to the bicycle circulation standards of significance on pages 3-88 and 3-89 of the Draft PEIR). While other effects, both negative and positive, may occur, they are not the focus of this analysis. PEIR text (p. 3-3, Figure 3.2-1) has been modified as recommended. Refer to Chapter 4, Errata, of the Final PEIR.



Response to Comment I8-2

The proposed bridge over the American River would accommodate light rail vehicles, pedestrians, and bicyclists, as discussed in Chapter 2.0, Project Description, of the Draft PEIR. Connections would be provided to pedestrian and bicycle facilities along the American River in South Natomas and in the Richards Blvd. Area. Details of such connections will be determined during future project-level design and engineering.

Response to Comment I8-3

As evaluated in the PEIR, the DNA project does not include bicycle and pedestrian facilities on the proposed I-80 overcrossing. On-street bicycle lanes and sidewalks are provided on the adjacent Truxel Road overcrossing. The inclusion of bicycle and pedestrian facilities on the new overcrossing would add significant cost to implementation of the DNA project. However, details of the I-80 overcrossing will be determined during future-project level design and engineering.

Response to Comment I8-4

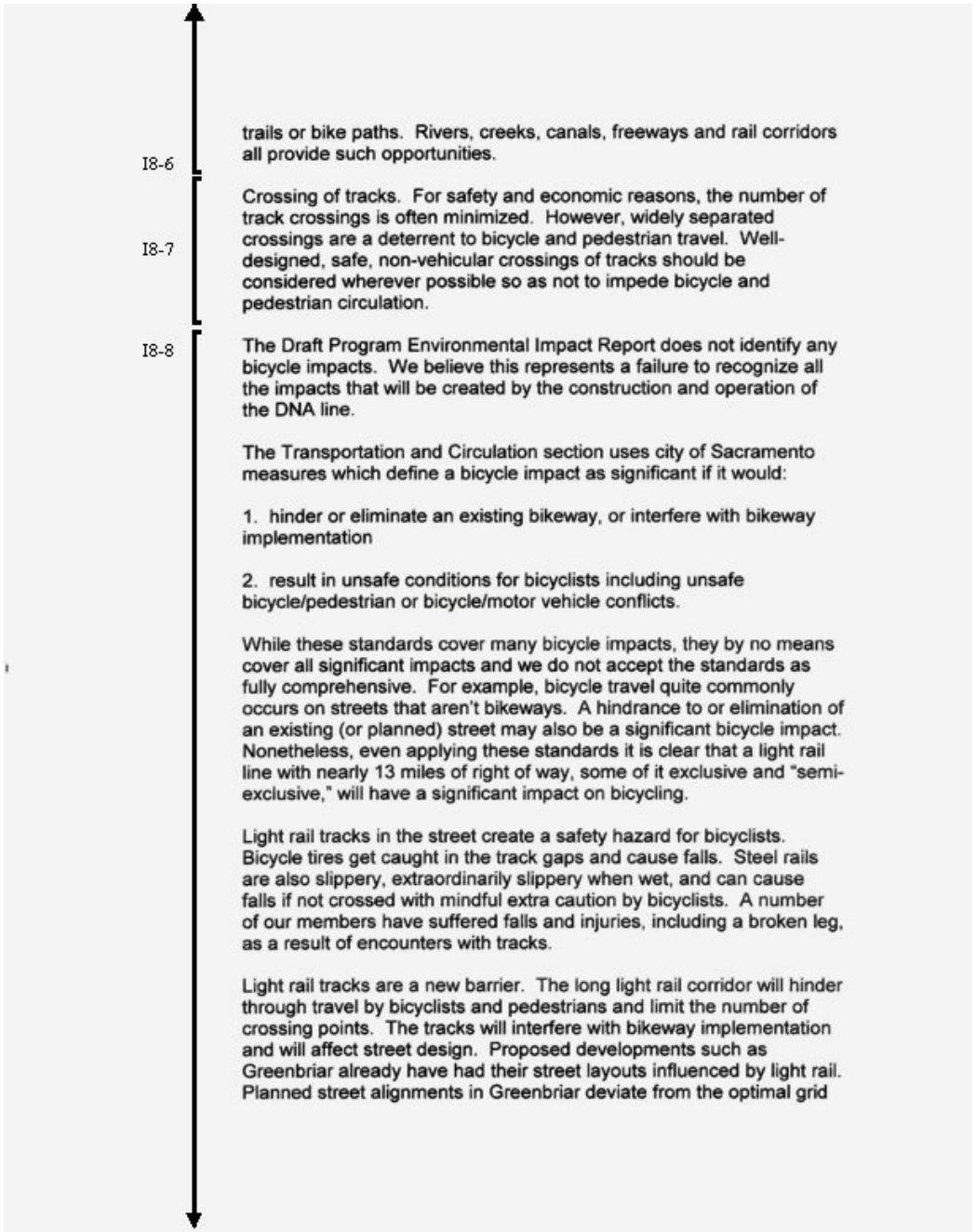
The DNA project does not affect bicycle and pedestrian access routes across I-5. Within the City of Sacramento, all new and reconstructed street overcrossings of I-5 will include both bicycle and pedestrian facilities.

Response to Comment I8-5

Park-and-ride lots are a critical element of the DNA project. RT is supportive of transit-oriented development adjacent to stations; however, many people who travel in the Sacramento area do not live in areas with pedestrian, bicycle, or transit access to the DNA project. As a result, without park-and-ride access, it is estimated that the majority of these potential transit riders would choose not to ride transit. As shown in Table 3.6-10 of the Draft PEIR, it is estimated that about 25.8 percent of weekday boardings will drive to use transit. At this time, RT does not charge for parking at its stations. A parking charge would decrease transit ridership and could result in unwanted commuter parking in adjacent residential, commercial, and industrial areas.

Response to Comment I8-6

Most of the right-of-way for the project is in or adjacent to City streets, where pedestrian facilities and bikeways are often provided. Exclusive right-of-way for the project is limited. As noted in the response to Comment I8-2, the proposed bridge over the American River would accommodate light rail vehicles, pedestrians, and bicyclists. The short section of exclusive right-of-way between East Commerce Way and SR 99 is close to proposed City streets with pedestrian and bicycle facilities. Future project-level design and engineering will provide an opportunity for further consideration of additional pedestrian and bicycle facilities.



I8-6

trails or bike paths. Rivers, creeks, canals, freeways and rail corridors all provide such opportunities.

I8-7

Crossing of tracks. For safety and economic reasons, the number of track crossings is often minimized. However, widely separated crossings are a deterrent to bicycle and pedestrian travel. Well-designed, safe, non-vehicular crossings of tracks should be considered wherever possible so as not to impede bicycle and pedestrian circulation.

I8-8

The Draft Program Environmental Impact Report does not identify any bicycle impacts. We believe this represents a failure to recognize all the impacts that will be created by the construction and operation of the DNA line.

The Transportation and Circulation section uses city of Sacramento measures which define a bicycle impact as significant if it would:

1. hinder or eliminate an existing bikeway, or interfere with bikeway implementation

2. result in unsafe conditions for bicyclists including unsafe bicycle/pedestrian or bicycle/motor vehicle conflicts.

While these standards cover many bicycle impacts, they by no means cover all significant impacts and we do not accept the standards as fully comprehensive. For example, bicycle travel quite commonly occurs on streets that aren't bikeways. A hindrance to or elimination of an existing (or planned) street may also be a significant bicycle impact. Nonetheless, even applying these standards it is clear that a light rail line with nearly 13 miles of right of way, some of it exclusive and "semi-exclusive," will have a significant impact on bicycling.

Light rail tracks in the street create a safety hazard for bicyclists. Bicycle tires get caught in the track gaps and cause falls. Steel rails are also slippery, extraordinarily slippery when wet, and can cause falls if not crossed with mindful extra caution by bicyclists. A number of our members have suffered falls and injuries, including a broken leg, as a result of encounters with tracks.

Light rail tracks are a new barrier. The long light rail corridor will hinder through travel by bicyclists and pedestrians and limit the number of crossing points. The tracks will interfere with bikeway implementation and will affect street design. Proposed developments such as Greenbriar already have had their street layouts influenced by light rail. Planned street alignments in Greenbriar deviate from the optimal grid

Response to Comment I8-7

The closure of any major streets or access points in order to minimize at-grade crossings is not anticipated as a result of the DNA project. Similarly, the DNA project provides adequate and safe pedestrian and bicycle circulation. Specific details regarding crossings will be determined during future project-level design and engineering.

Response to Comment I8-8

As noted in the response to Comment I8-1, the analysis in the Draft PEIR is based on the standards of significance, adopted by the Sacramento City Council. While the project may have other effects on bicycle and pedestrian circulation, significant impacts for CEQA purposes are based solely on the significance criteria.

Because the DNA project will operate in or adjacent to City streets through much of its length, it is not anticipated to substantially hinder bicycle travel. In other words, the light rail line will not result in extensive "barriers." The project does not propose to close any major streets or access points. The North Natomas Community Plan was developed with an extensive bikeway and pedestrian plan that incorporates the light rail corridor. The grid pattern of streets within the Greenbriar project was planned independently of the DNA project. These effects on bicycle and pedestrian travel do not constitute a significant CEQA impact when evaluated in accordance with the significance criteria.

Light rail tracks in public streets are a common occurrence in Sacramento, and are one of many things bicyclists must be aware of, including buses, automobiles, trucks, parked cars, debris, and potholes.

Regarding the commenter's recommendations:

- Bikeways in light rail right-of-way - please refer to response to Comment I8-6

- Bikeway / pedestrian access on crossings - please refer to responses to comments I8-2 and I8-3. The crossing of SR 99 is adjacent to the planned Meister Way crossing, which will include both pedestrian and bicycle facilities.

- Access to light rail stations - specific details regarding station design will be determined during future project-level design and engineering.

- Provide track flange fillers - Flangeway fillers to meet bicycle and ADA requirements will be used where paved track is located throughout the DNA extension. This technology that is available, reduces, but does not eliminate the possibility of tires being caught next to rails. Signs are provided throughout the system to warn bicycle and motorcycle riders of potential hazards when crossing tracks.

- Eliminate park-and-ride lots - please refer to response to Comment I8-5

- Improve access across I-5 - please refer to response to Comment I8-4

pattern, at least in part, because of the DNA line right of way and efforts to minimize track crossings.

The light rail vehicles themselves are a new source of conflict and potential collision with cyclists and pedestrians.

As mentioned, park and ride lots at light rail stations increase vehicular traffic in station vicinities and complicate bicycle and pedestrian access to stations.

As mitigation for these impacts, and in order to capitalize on the opportunities mentioned above, we recommend the following:

include bikeways in the light rail right of way where possible
include bike/pedestrian access with all bridges and overcrossings, such as the crossings of I-80 and Hwy 99 and the American River bridge.
optimize bicycle access to light rails stations, including short-cuts and connections to Class I bike paths
provide track flange fillers where bicyclists will be crossing the tracks
eliminate park and ride lots, or minimize the number and size of the lots and always institute a charge for parking
improve bicycle and pedestrian access across I-5

I8-8

SABA is an award winning nonprofit organization with more than 1.400 members. We represent bicyclists. Our aim is more and safer trips by bike. We're working for a future in which bicycling for everyday transportation is common because it is safe, convenient and desirable. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient and least congesting form of transportation.

Yours truly,

Walt Seifert
Executive Director

Don Smith - Program Comments on the Project DEIR

From: "Reed Benet" <reedmbenet@worldnet.att.net>
To: <dsmith@sacrt.com>
Date: 2/26/2008 12:10 PM
Subject: Program Comments on the Project DEIR

Hello Mr. Smith:

Thank you for giving me the opportunity to submit my comments on the Project DEIR via email, given that the mailing deadline for comments is today. **Please confirm your receipt of this email.**

As for my comments:

Dear RT Board:

I9-1 Thank you for the opportunity to comment last night at the public hearing regarding the proposed Downtown-Natomas-Airport (DNA) light rail line. I recognize that such was not an allowed time for me to ask questions, but given Director Cohn's subsequent comments to mine, it became clear to me that there has been NO consideration made by RT staff, let alone the Board, to the Yolo County Short Line right-of-way (YCSL ROW) as potentially providing a faster to fruition, quicker travel time, more environmentally friendly, and perhaps significantly cheaper alternative route from downtown to the airport. As further confirmation of this, I do know for a fact that no one has made even preliminary contact with YCSL in this regard.

This is worrisome for a number of reasons:

I9-2 1. I know that YCSL would be amenable to discussions.
2. While a YCSL ROW route wouldn't serve the vision of providing rail to intermediate stops in Natomas, it
I9-3 isn't very clear, particularly given DNA's estimated significant cost, that even DNA provides Natomas the best transportation options intra-Natomas/North Sacramento or from these locations to downtown or the airport,
3. Note that Yolo County Board of Supervisors is considering a commercial and industrial center in Elkhorn,
I9-4 so an YCSL ROW could have a significant intermediate destination/point of trip origination purpose that could also potentially have a significant effect on transit use and utility.
4. SacRT's failure to look just across the river suggests a certain border myopia. I encourage the
I9-5 consideration and adherence to the "Regional" part of SacRT's title. Furthermore, I suggest SacRT contact SACOG, although I know from having talked to some people there that the YCSL ROW is also not on their radar screen.
5. Looking at YCSL on the map, where it seems potentially easily connectible to downtown via rail and where
I9-6 it runs today within two miles of the airport, and comparing this potential route to the proposed DNA route, makes an YCSL ROW seem like a common sense and obvious alternative. And while there may be other disqualifying issues, my point isn't that there won't be such issues. But rather my point is that, particularly given DNA's estimated significant cost, the lack of a process to see if there are disqualifying issues is disturbing.
6. Since there is general dissatisfaction with Natomas sprawl, this sprawl being in significant government and
I9-7 private funds absorbing flood plain, the not perhaps entirely invalid points being made that DNA might be a solution looking for a problem, and that DNA might be either growth inducing or growth "green-washing," a failure to consider YCSL could be considered by at least the conspiracy theorists as troublesome, let alone public expenditure budget hawks like myself that might look upon this all as a failure perhaps in staff competence and a direct or indirect failure of the Board's fidicuiary responsibility, or at the least probably an unwelcome late surprise,
I9-8 7. Director Cohn may be right, or he may be wrong, that an YCSL ROW will require two bridges. But not knowing definitively in any case is exactly the problem. Furthermore, the point of an YCSL ROW is that as a heavy-rail alternative, it may be able to utilize the Amtrak bridge, thus making an Elkhorn located bridge

Letter I9. Reed M. Benet

Response to Comment I9-1

Comment noted. Please see response to Comment I9-10.

Response to Comment I9-2

Comment noted. Please see response to Comment I9-10.

Response to Comment I9-3

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

to cross the Sacramento River near the airport comparable in costs to the proposed American River bridge for DNA. And as a grade separated bus rapid transit route, it could utilize the Elkhorn I-5 bridge, thus potentially eliminating all bridge costs and significant environmental considerations. Still, though, the bigger issues, I think, is what's the comparable cost of the entire DNA project (proposed at $750+M, although I can't imagine that such an estimate ever proves right) versus the costs, with all it already-knowns, of a YCSL ROW based solution. Assuming no major disqualifications for the YCSL ROW approach, and with relative costs and timing known, then and perhaps only then is it an appropriate time to make decisions on the magnitude of expenditures and environmental effect of the proposed DNA effort.

I9-8

8. Thus, I suggest that until YCSL ROW's implications are known and comparable, it is premature to consider a Project DEIR, because the Project DEIR perhaps has a fundamental and perhaps quite presumptuous weakness that it is questionable whether the proposed DNA solution, whatever is its East side of the Sacramento River right-of-way, is the best.

I9-9
I9-1

As for my official questions, which I believe are required to be answered in the Project DEIR process:

I9-10

1. Was the YCSL ROW considered as an alternative route?
2. If so, what disqualified it?
3. If not, why wasn't YCSL considered?

I9-11

4. Does a Project DEIR require a consideration of all reasonable alternatives?
5. If the YCSL ROW is a reasonable alternative, what are the implications for the DNA and the Project DEIR of the process having missed it?

I9-12

6. Could the failure of such consideration lead to expensive, delaying, and eminently avoidable lawsuits?

Thank you for your consideration. I am certainly available for questions or further clarification to the above.

Sincerely,

Reed M. Benet (Signed electronically)
February 26, 2008
1874 Imperial Avenue
Davis, California 95616
Cell: 415 342 3634

Response to Comment I9-10

The Alternatives Analysis conducted in 2001 for the DNA line did not fully examine using the Yolo County Short Line right of way and tracks, but this was in part because of the way the analysis was conducted. All reasonable alternatives were collected, and a "fatal flaw" assessment was conducted, including conversation with the public, on the various alternatives. Due to the generally lower cost of some commuter rail alternatives, commuter rail was considered among the 27 basic options in the alternatives analysis. However, given the basic vision and mission behind the Alternatives Analysis, including supporting the formation of transit-oriented communities and service to the region as a whole, the actual YCSL alignment had too many fatal flaws to be considered viable by comparison with the "No build" or the "Transportation System Management" alternatives.

The issues with using the YCSL alignment and tracks are many, beginning with the beauty of the countryside along the alignment. Except for a few neighborhoods in Yolo County, the majority of the alignment runs through countryside. As such, there would be no stops between West Sacramento and the airport from which to pick up any passengers, which would result in lower ridership numbers than the DNA project.

There is an existing crossing over the river, but it would have to be modified to accommodate any additional traffic. A modified bridge would face all of the objections of the bridge proposed for the DNA project. There are plans to re-align the freight tracks in the Railyards, but this will make the tracks more usable for daily freight operations. While commuter rail operations do take place on freight track in other parts of the country, it is usually

at the cost of ceding precedence to the freight operation. Thus, if the freight train is within its agreed upon "operating window", even if it is ten minutes late or running slow, the passenger train must wait for the tracks to clear. This would eliminate the possibility of an airport service adhering to schedule with any regularity. Adding tracks to allow for joint operation would require rebuilding the bridge over the river or building a new bridge which would incur all of the costs and environmental concerns as the proposed DNA bridge.

The YCSL right-of-way runs through sensitive ecology along a significant stretch of the alignment, making reconstruction of the track, which is a necessity for efficient operation, very expensive. The YCSL right-of-way has only one track for a considerable distance toward the airport, so a second track would be required to accommodate rail service to the airport. Finally, the track is a functioning freight track. This puts it under the oversight of the Federal Railroad Administration, which sets standards for such things as rail car strength, safety, operation and other parameters. RT would have to become an operating railroad, in addition to a public transportation agency, with railroad as well as light rail infrastructure. The ongoing operational and capital costs of such an evolution make the ridership to and from the airport uneconomical, potentially jeopardizing competitiveness for eventual Federal grant funds.

Response to Comment I9-11

CEQA Guidelines Section 15126.6(a), Consideration and Discussion of Alternatives to the Proposed Project, states:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."

As described in response to Comment I9-10, the 2001 Alternatives Analysis included all reasonable alternatives and a "fatal flaw" assessment was conducted, including conversation with the public, on the various alternatives. Given the basic vision and mission behind the Alternatives Analysis, including supporting the formation of transit-oriented communities and service to the region as a whole, the actual YCSL alignment had too many fatal flaws to be considered viable by comparison with the "No build" or the "Transportation System Management" alternatives. These fatal flaws are described in response to Comment I9-10.

Response to Comment I9-12

As explained in the responses to Comments I9-10 and I9-11, because the YCSL is not a reasonable alternative to the DNA project, there are no implications for the DNA project or the Program EIR as a result of the YCSL's omission from the 2001 Alternatives Analysis.

Letter I10. Ken Mayes

Letter	Date	Name	Agency Type	Format	Comment #	Category	Comment
64	02/26/08	kenmayes@comcast.net	Individual	Website	64-1		

I10-1

The DNA PEIR does not address the life cycle GHG emissions that come directly from materials to be used in construction, operation or maintenance of the facilities. Practically every purchase that is to be made requires importation of GHG rich materials to CA since the State has chosen to limit production of same. It also dismisses the release of more that 50,000 met tons of CO2 in the construction process. Further, there is no reference to the need to provide additional power to the project at a time when SMUD is required to eliminate essentialy all of its fossil fuel generating capacity (thus DNA has power only between 10:00AM to 2:00PM or when the wind blows unless it is over 50 mph.) Further, there is no mention of having to retrofit all of the buses or purchase new ones to eliminate the use of CNG. Further, it is incomprehensible that the energy from reduction in public VMT balances the energy needed by the project even thought we recognize that the PEIR omitted any reference to system requirements for fuel and power. This is clearly a situation that where the numbers were forced to eliminate the need for an AG review. Further, it is clear that the carbon balace that is produced by the early segments of the project will never be offset in the lifetime of the project. Further, there was no mention of eliminating the purchase of any vehicle or material that contained any derivative from fossil fuels or required any fossil fuel derivates in the future like petroleum based plastics,fabrics,lubricants, fuels, water proofing agents or asphaltic material. AB32 forbids the export of CO2 emissions outside of CA so the projects must offset the entire CO2 cycle cost for everything that is purchased outside of the State such as vehicles, cement, metals for construction or heavy machinery and/or equipment. The AG requires that all transportation projects use less energy after completion that before they are built and all construction emissions are required to be offset. The PEIR indicates that this is not the case. DNA must comment on the fact that it is being used as an enabler to build thousands of new structures that will emit million of tons of addional GHGs in the near term while burdening the taxpayer with billions of dollars in bond payments when the project revenues won't even pay for the projected operating and maintenace expenses.

Response to Comment I10-1

Comment noted. The Draft PEIR was prepared to meet CEQA requirements for analysis of a project at the program-level. Currently, CEQA does not require life cycle assessments of greenhouse gas emissions nor does it specifically require mitigation of greenhouse gas emissions. Senate Bill (SB) 97 requires the Office of Planning and Research to prepare, develop, and submit guidelines for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions by July 1, 2009. Therefore, these guidelines are not yet applicable to the DNA project. It is possible that GHG mitigation measures developed under SB 97 may apply to future project-level analyses. Therefore, GHG emissions and GHG mitigation measures may be addressed at the time the project-level analyses are prepared.

1555 Danica Way
Sacramento, CA 95833
February 23, 2008

FEB 25 2008

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

Subject: Comments on the Downtown-Natomas-Airport Draft PEIR

Dear Mr. Smith:

As a 12+ year resident of South Natomas, I recently reviewed the draft PEIR for the DNA project. I have several comments and questions about various aspects of the analysis.

11-1

1. The document is not written in a manner that facilitates public understanding of the project's impacts or that encourages the public to comment on them.

I must express my dismay about the format and organization of the EIR analysis itself. I am employed as a senior editor for an environmental consulting firm in Sacramento. (Please note that I am writing this comment letter as an individual South Natomas resident, and not on behalf of my employer.) For the past 8 years I have served as a technical editor on EIRs, joint CEQA/NEPA analyses, and other large planning documents, such as county general plans. As a result, I am perhaps more accustomed to planning lingo and the format of CEQA documents than the average private citizen. That said, I found the presentation of the analysis in the DNA PEIR (particularly in the impacts sections in Chapters 3 and 4) difficult to follow. As a result, I have to question the adequacy of this document under CEQA.

My specific objections and suggestions are described below.

Poor EIR Organization

In Chapter 3 the discussion of impacts jumped back and forth between MOS-1 and the full DNA project by topic area. Furthermore, in Chapters 3 and 4 it was difficult for me to determine exactly what each impact and mitigation measure would be: The PEIR buries the impact and mitigation measure numbers, identifying them only incidentally (in parentheses) at the end of each discussion. All in all, it was a challenge to determine the actual effects of the project, both before and after implementation of mitigation.

Section 15121(a) of the State CEQA Guidelines states, "An EIR is an informational document which will inform public agency decision-makers *and the public generally* of the significant environmental effect of a project,..." [emphasis added]. If an EIR is written and organized in

Letter I11. Julie Nichols

Response to Comment I11-1

RT agrees that an EIR must be prepared in a manner that facilitates public understanding of a project and its impacts, and this need is reinforced by the CEQA Guidelines. RT disagrees, however, that the DNA PEIR is difficult to understand. Other than general guidance about the contents of an EIR, the CEQA Guidelines do not mandate any particular format in which the information is presented. Although the commenter states that she is used to seeing information presented in a particular systematic manner (e.g., numbering of impacts at the beginning of each impact discussion), the use of other formats, such as the more narrative format used in the DNA PEIR, does not imply that the document is inadequate. With regard to the traffic analysis (Chapter 3.0), RT chose to group the analysis by subtopic (i.e., transit, traffic, and parking) rather than by segment because it believed that format to be more reader-friendly.

11-1 such a way that a professional who edits EIRs for a living is having trouble understanding it, it seems reasonable to conclude that the general public would have even more difficulty.

Insufficient Information about Opportunities for Public Comment

11-2 I could find no description in the draft PEIR of how members of the public could comment on the document. Although it is theoretically possible that this was an honest oversight on the part of RT's consultants (and the project newsletter I received in the mail did include this information), this strikes me as too important a piece of information to be left out of the EIR. I have often seen such information presented in Chapter 1 of an EIR. Why was it not presented there in the DNA PEIR?

How the EIR Should Have Been Presented

11-3 Based on my experience editing EIRs, I know that it is possible to present this analysis in a format that would be easier to read. For example, to ensure that members of the public could discern the impacts of the project, Chapters 3 and 4 should have presented impact and mitigation measure numbers at the beginning (not the end) of each discussion, in a format that would make them easy to locate (e.g., boldface). A brief summary of the impact should have accompanied each impact number. Chapter 3 also might have been easier to understand if all MOS-1 impacts (regardless of topic area) had been discussed first, then all impacts of the full DNA project.

2. The traffic analysis, in particular, needs better explanation of the numbers cited and assertions made.

Insufficient Explanations

11-4 The Transportation and Circulation chapter presents a set of tables designed, I suppose, to convince readers that traffic levels are expected to be so bad by 2027 that the light rail line—even through South Natomas on Truxel—could do nothing but improve conditions. However, there is little to no explanation of concepts that seem to make no sense; again, this merely serves to confuse the reader. For example, Table 3.8-3 states, without attribution, that average daily (Future No-Project) traffic levels along four roadway segments between Garden Highway and I-80 are forecast to increase by 20–100% between 2005 and 2027. South Natomas in this area is already built out. I have the following questions about this table:

(a) How did RT determine that traffic between Garden Highway and West El Camino Avenue will increase by 100% by 2027? This seems like a very large increase for an area that is not a new-development area.

Response to Comment I11-2

Information about the agency and public comment processes and deadlines were provided extensively in the Notice of Availability, Newsletter, and in other forums. Although this information is sometimes provided in the body of an EIR itself, it is not required by CEQA.

Response to Comment I11-3

RT agrees that an EIR must be prepared in a manner that facilitates public understanding of a project and its impacts, and this need is reinforced by the CEQA Guidelines. RT disagrees, however, that the DNA PEIR is difficult to understand. Other than general guidance about the contents of an EIR, the CEQA Guidelines do not mandate any particular format in which the information is presented. Although the commenter states that she is used to seeing information presented in a particular systematic manner (e.g., numbering of impacts at the beginning of each impact discussion), the use of other formats, such as the more narrative format used in the DNA PEIR, does not imply that the document is inadequate. With regard to the traffic analysis (Chapter 3.0), RT chose to group the analysis by subtopic (i.e., transit, traffic, and parking) rather than by segment because it believed that format to be more reader-friendly.

Response to Comment I11-4

As described in Chapter 3.0, of the Draft PEIR, traffic volumes in existing developed areas were determined using the travel forecasting methodology. Future traffic conditions were determined using the Sacramento Metropolitan Travel Demand Model (SACMET).

11-5

(b) A footnote explains that the "2005" ADT for West El Camino–Pebblewood (18,000 ADT) is actually *2000* ADT. The same approach was taken in several segments of Truxel in North Natomas. Why was a different year used for ADT in these roadway segments than in the others?

Poor Attribution

11-6

The attribution of statements made in the Transportation and Circulation chapter is poor. Although the beginning of the chapter very generally cites the *DNA Corridor Travel Forecasting Analysis Technical Report* and the *DNA Corridor Traffic and Transportation Technical Report*, there are very few citations within the rest of the chapter, requiring the reader to pore through each report in its entirety to find the attribution for blanket statements.

For example, the first full paragraph of page 3-40 states: "For the DNA project, 35.6 percent of all work trips to Downtown Sacramento from the DNA Corridor were forecasted to use transit (Table 3.6-4). In the DNA Corridor, the proportion of commuters that would choose transit is 5.2 percent for the DNA project." Please provide some clarification as follows:

(a) I was unable to find attribution for these statements; please indicate their precise location in the document(s) of origin.

11-7

(b) The juxtaposition of the two sentences quoted (which identify 35.6 percent of work trips and 5.2 percent of commuters, respectively, as using transit) is confusing. Please explain how these numbers were derived and why they are so different.

11-8

3. Traffic impacts on South Natomas would be unacceptable, and not all of the identified mitigation may be feasible as identified in the draft PEIR.

Despite the fact that the project would no longer involve acquisition of residences on the east side of Truxel Road, it still would affect residents who live there, as well as others who live near Truxel. I cite in particular Impact TRAN-16 (elimination of median left-turn access at some local streets and driveways in South Natomas), identified as significant and unavoidable; and Impact TRAN-17 (potential for transit users parking in neighborhoods or on commercial sites). Also, as described below, the EIR's traffic mitigation is inadequate, and other traffic-related impacts could result.

Impact TRAN-16/Mitigation Measure MTRAN-16

(a) The EIR states that the mixed-flow design "would still impact two or three local intersections, as well as driveways at 14 single-family residences." Based on the format of

Response to Comment I11-5

The footnote in the table indicates segments for which only year 2000 data was available. Locations without the footnote used 2005 data.

Response to Comment I11-6

Please refer to Chapter 3.0, page 40, of the Draft PEIR, where the first paragraph contains the following statement:

"For the DNA project, 35.6 percent of all work trips to Downtown Sacramento from the DNA Corridor were forecasted to use transit (Table 3.6-4). In the DNA Corridor, the proportion of commuters that would choose transit is 5.2 percent for the DNA project."

The commenter is correct that attribution of the origin statements is not always identified. However, for the given example, Table 3.6-4 is referenced and identifies 35.6 percent of all work trips with an origin in the DNA corridor and a destination in the Downtown corridor use public transit for the project scenario (see figure 3.5-2 for boundaries of regional transit corridors). Table 3.6-4 also identifies 5.2 percent of all work trips originating in the DNA corridor use public transit for the project scenario. The 35.6 percent applies only to work trips from DNA corridor to the Downtown corridor. The 5.2 percent applies to work trips from the DNA corridor to any destination in the region (Downtown corridor, DNA/I-5 corridor, Watt/I-80 corridor, Folsom/US50 corridor, South Line corridor, and West Sacramento corridor). The values presented in Table 3.6-4 were produced using the Sacramento Metropolitan Travel Demand Model (SACMET).

Response to Comment I11-7

Please refer to Chapter 3.0, page 40, of the Draft PEIR, where the first paragraph contains the following statement:

> "For the DNA project, 35.6 percent of all work trips to Downtown Sacramento from the DNA Corridor were forecasted to use transit (Table 3.6-4). In the DNA Corridor, the proportion of commuters that would choose transit is 5.2 percent for the DNA project."

The commenter is correct that attribution of the origin statements is not always identified. However, for the given example, Table 3.6-4 is referenced and identifies 35.6 percent of all work trips with an origin in the DNA corridor and a destination in the Downtown corridor use public transit for the project scenario (see figure 3.5-2 for boundaries of regional transit corridors). Table 3.6-4 also identifies 5.2 percent of all work trips originating in the DNA corridor use public transit for the project scenario. The 35.6 percent applies only to work trips from DNA corridor to the Downtown corridor. The 5.2 percent applies to work trips from the DNA corridor to any destination in the region (Downtown corridor, DNA/I-5 corridor, Watt/I-80 corridor, Folsom/US50 corridor, South Line corridor, and West Sacramento corridor). The values presented in Table 3.6-4 were produced using the Sacramento Metropolitan Travel Demand Model (SACMET).

Response to Comment I11-8

Due to the programmatic nature of the document, the text was written so as to not suggest a degree of specificity that does not exist. Depending on the design option and details regarding alignment developed in subsequent design phases of the project, there could be a range of impacts.

11-8 the EIR, it appears that RT regards the mixed-flow design as a mitigation measure (as it is identified as Mitigation MTRAN-16); how is this "mitigation"?

11-9 (b) The EIR fails to identify *which* two or three local intersections and *which* 14 single-family residences would lose median left-turn access. I understand that this is a program level EIR; however, it appears that RT is already far enough along with its design to be able to identify "two or three" intersections and "14" residences that would lose median left-turn access, so why does RT not identify precisely *where* such an impact would occur? Is it, perhaps, because RT knows, based on experience with South Natomas residents who have opposed light rail on Truxel in the past, that identifying these locations would do nothing but arouse these residents' ire yet again?

Impact TRAN-17/Mitigation Measure MTRAN-17

1-10 The EIR states that the implementation of Mitigation Measure MTRAN-17 would reduce the impact of spillover parking to a less-than-significant level. I beg to differ. RT assumes that establishing Residential Permit Parking Zones and developing a parking monitoring program on streets around new transit stations would cause the problem of overflow parking to simply go away. RT cannot control how diligent the City of Sacramento would be in actually enforcing the terms of the monitoring program. Currently the City is in a fiscal crisis and is having to lay off staff. While the City may not be in such dire straits in the future, the question of funding must be addressed: Unless RT is specifically willing to provide all funds needed by the City to fully implement parking enforcement and other terms of the monitoring program, it cannot be assumed that the City will actually be able to go through with the program. As a result, it is speculative at best—and more likely simply incorrect—to assume that transit users will not opt to park on neighboring streets, given the insufficient number of park-and-ride spaces for projected demand.

Mitigation Measure MTRAN-8

1-11 In addition to the problems associated with Impacts TRANS-16 and TRANS-17, Mitigation Measure MTRAN-8 (page 3-84) is speculative and potentially infeasible. The EIR claims that implementation of this mitigation (adding a second eastbound left-turn lane at the Garden Highway/Truxel Road intersection) would reduce Impact TRAN-8 to a less-than-significant level. This mitigation is unduly speculative because it simply assumes the widening of Garden Highway from two to four lanes. The *2006 Metropolitan Transportation Plan* may include the widening of Garden Highway as one of its projects, but is this project actually funded? Unless and until funding is available and Garden Highway is *actually* widened, Mitigation Measure MTRAN-8 is infeasible and thus cannot reduce the impact on the Garden Highway/Truxel Road intersection.

Response to Comment I11-9

Due to the programmatic nature of the document, the text was written so as to not suggest a degree of specificity that does not exist. Depending on the design option and details regarding alignment developed in subsequent design phases of the project, there could be a range of impacts.

Response to Comment I11-10

The Draft PEIR notes that the City of Sacramento currently has a program for establishing Residential Permit Parking Zones and that the City recommended that it be replicated in neighborhoods around new transit stations. The program is initiated by residents in the neighborhood by submitting a letter to the City indicating an interest in residential permit parking and involves several steps including drawing tentative boundaries, conducting parking occupancy surveys, and hearings and action by the City Council.

The Draft PEIR additionally notes that, to expedite the process, RT could conduct on-street parking occupancy surveys for an area within a quarter mile around each station both before and after the startup of DNA transit service. As such, the City would be prepared to assist residents in expediting the residential parking permit process. Specific details regarding parking mitigation would be developed in subsequent project-level phases of the project.

Response to Comment I11-11

The commenter asserts Mitigation Measure MTRAN-8 is

infeasible because it relies on the completion of an MTP project (widening Garden Highway) that might not be implemented. RT disagrees with this assertion. The MTP - a regionally adopted program of transportation improvements - provides a reasonably foreseeable future condition by which to evaluate the DNA project's traffic impacts. MTP projects are not speculative; even if specific funding is not confirmed and detailed design efforts are not underway (the Garden Highway project has an anticipated completion year of 2025). Because the DNA project will continue to be subject to detailed project-level environmental review as each phase is implemented, new information regarding the future setting for traffic conditions (such as changes in the list of MTP projects) will continue to be considered.

Other Potential Traffic-Related Impacts

1-12 Among the stated objectives of the project is to "provide environmental benefits in the Corridor." I fail to see how extending light rail down Truxel Road within South Natomas will provide net environmental *benefits to*, rather than simply *impacts on*, the neighborhood. Besides the impacts already identified in the Traffic and Transportation chapter, traffic on Truxel will back up behind idling trains operating in mixed flow, and motorists on signalized side streets (e.g., Pebblewood Drive) will wait longer periods as signal lights are preempted by passing trains. Also, what about traffic impacts associated with the motorists who would park at the park-and-ride lots at Truxel near San Juan Road, at Truxel and Pebblestone Way, and in the large parking structure at Truxel and West El Camino Avenue? These impacts should be quantified as well.

1-13 With the resulting increase in the number of motorists on Truxel Road, and increased idling for longer periods as motorists wait behind trains, air quality could be locally degraded and traffic delays could result both on Truxel and on side streets. Does the analysis of air quality impacts in Section 4.12 include the emissions generated as a result of this increase in idling? (It should.)

4. The RT board should reject the Truxel alignment and instead affirm the Hybrid Alignment Alternative.

1-14 Despite the criticisms expressed in my preceding comments, I do support the overall *concept* of extending light rail to Sacramento International Airport, as I know how much Natomas has grown in the years I have lived in this area. I also support the implementation of the MOS-1 segment of the line. However, the project as proposed is unacceptable once the line ventures past Richards Boulevard, across the American River and into South Natomas via Truxel Road. I support the adoption of the Hybrid Alignment Alternative instead of the proposed project. Therefore, I must pose two related questions, discussed further below:

(a) Why did RT have a change of heart about the hybrid alignment?

1-15 (b) Why not provide benefits to the *entire* RT corridor through adoption of the Hybrid Alignment Alternative?

1-16 Why Did RT Have a Change of Heart about the Hybrid Alignment?

One of the display boards presented at the February 9, 2008, public open house for the PEIR indicated that the hybrid alignment was initially regarded as RT's preferred alternative in the 1980s, *before* the Truxel alignment. Development in the vicinity of Truxel in South Natomas had already proceeded by that time (indeed, my house, on a cul-de-sac that backs up to the east side of Truxel, was built in 1984). Yet in December 2003, when the RT board selected the locally preferred alternative, the hybrid (i.e., I-5/Truxel) alignment was officially rejected in favor of the

Response to Comment I11-12

Please refer to Chapter 3.0, Table 3.6-8 of the Draft PEIR, which shows there is a high demand for an improved transit system in the DNA corridor. By providing light rail alternative, residents and employees in the DNA corridor will benefit from use of a transit service with competitive travel times (please refer to Chapter 3.0, Table 3.6-1 of the Draft PEIR). Because of the demand for transit service, RT expects regional environmental benefits in terms of reduced traffic congestion and improved air quality. RT recognizes, however, that providing this regional benefit will result in some localized adverse impacts. For example, please refer to the discussion of adverse traffic impacts in Section 3.8.2, adverse parking impacts in Section 3.9.3, adverse community impacts in Section 4.4.3, and adverse air quality impacts in Section 4.12.3. The Draft PEIR fully discloses potential adverse effects and provides a determination as to whether the effects can be mitigated (or not) to a less-than-significant level.

Response to Comment I11-13

Yes, the analysis of air quality impacts in Section 4.12.3 evaluates the effects of increased idling. Specifically, the analysis describes how changes in traffic congestion would result in changes in the concentration of carbon monoxide at the study intersections. These results are shown in Table 4.12-5 (1-hour concentrations) and Table 4.12-6 (8-hour concentrations) of the Draft PEIR.

Response to Comment I11-14

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. RT is committed to providing transit service to the airport and, as a result of an extensive Alternatives Analysis process, selected light rail along the Truxel corridor as its Locally Preferred Alternative.

Response to Comment I11-15

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. RT is committed to providing transit service to the airport and, as a result of an extensive Alternatives Analysis process, selected light rail along the Truxel corridor as its Locally Preferred Alternative.

Response to Comment I11-16

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. RT is committed to providing transit service to the airport and, as a result of an extensive Alternatives Analysis process, selected light rail along the Truxel corridor as its Locally Preferred Alternative.

Truxel alignment, and no amount of argument by South Natomas residents could sway the board members, whose minds appeared to have been made up long before that time.

It seems to me that, as a policy matter, routing preference should be given to avoiding already developed areas (such as Truxel in South Natomas) at the outset of a project; the RT board has had that opportunity for many years with the hybrid alignment, but rejected it anyway. Even if RT is unwilling to resurrect the hybrid alignment, I believe that this PEIR should at least explain why RT is so wedded to the Truxel alignment despite the obvious land use problems. Please clarify for the record: What were RT's reasons for changing its mind about the hybrid alignment back in 1991 and thereafter supporting the Truxel alignment instead? 1-16

Why Not Provide Benefits to the *Entire* DNA Corridor through adoption of the Hybrid Alignment Alternative?

If, as expressed in its objectives for the DNA project, RT truly seeks to provide environmental benefits in the Corridor, it should seek to provide such benefits in the *entire* Corridor—not just areas of new development. The businesses on the west side of I-5 in South Natomas would benefit from adding light rail under the Hybrid Alignment Alternative; however, the residents along Truxel would *not* benefit from light rail under the proposed project—or, if they would benefit, any such benefit would be negated by the traffic and potential air quality impacts with which they would have to deal every day.

Given that there is precedent for the hybrid alignment, why not support it now, when doing so will avoid significant impacts on the one part of the project area that was developed *without* light rail factored in? It may be that the hybrid alignment would cost RT a bit more, but South Natomas residents shouldn't have to pay the nonmonetary price just to save RT some money—particularly considering how expensive the line is already projected to be. 1-17

Unlike Truxel Road in South Natomas, Truxel in *North* Natomas is wide enough to accommodate transit (given that areas of right-of-way have already been set aside), and it would be appropriate for light rail to serve the Natomas Marketplace, Arco Arena, and the many other shopping areas and businesses along Truxel in North Natomas. This goal could still be met if the Hybrid Alignment Alternative were implemented, without resulting in the adverse impacts on South Natomas residents that would result under the proposed project. Therefore, I urge you to reject the proposed project and instead adopt the Hybrid Alignment Alternative. Thank you.

Sincerely yours,

Julie Nichols

Response to Comment I11-17

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. RT is committed to providing transit service to the airport and, as a result of an extensive Alternatives Analysis process, selected light rail along the Truxel corridor as its Locally Preferred Alternative.

Page 1 of 1

Don Smith - Re: Comments on DNA

From: Don Smith
To: linnhom@winfirst.com
Date: 2/21/2008 7:07 AM
Subject: Re: Comments on DNA

Thank you for your comments on the DNA PEIR.

>>> <linnhom@winfirst.com> 2/20/2008 8:14 PM >>>

I12-1 The DNA line going up Truxel Road is a bad idea. The alignment would be better serve the community going along I-5.

Thank you,
Linn Hom
1565 Danica Way
Sacramento, Ca 95833
(916) 923-3613

file://C:\Temp\XPGrpWise\47BD233CRTAdmin100169616211CABD1\GW}00001.... 2/21/2008

Letter I12. Linn Hom

Response to Comment I12-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

Letter I13. jgoralka@hotmail.com

Letter	Date	Name	Agency Type	Format	Comment #	Category	Comment
57	02/25/08	jgoralka@hotmail.com	Individual	Website	57-1		They want to be added to the mailing list = yes Their address is = Their city is = Their state is = Their zip is =Their comments are = I support a light rail transit to the airport. I have lived in Boston and never had a car. I could easily get to and from work and the airport whenever I needed. I also saw many elderly people that could not drive have the freedom to travel throughout boston and its suburbs and the airport. This is a huge window of opportunity since there does not seem to be a lot of construction in the way of the proposed transit line. Once construction occurs the window of opportunity for convenient public transportation goes away. I do not support a bus system at all. Once the traffic grows it will be very inconvenient and less people will use it. I lived in NJ and took buses to NYC. It would take 2+ hours to get only a few miles because of traffic. Especially around the holidays. I also believe the opportunity to utilize public transportation is good for the environment as less gas using cars will be on the road. Thanks for letting the public comment

I13-1

Response to Comment I13-1

Thank you for your comment. RT appreciates your support for the project.

Letter I16. Richard Wilkens.

Letter	Date	Name	Agency Type	Format	Comment #	Category	Comment
37	02/13/08	Richard Wilkens 3901 191 PL SW Lynnwood, WA 98036 railsnw@att.net	Individual	Website	37-1		As a visitor to the California State Railroad Museum (and member) on a regular basis, I have to say a light rail connection from the airport to the Amtrak station would be a very good plan.

I16-1

Response to Comment I16-1

Thank you for your comment. RT appreciates your support for the project.

Letter I17. Sara Provancha

Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment
36	02/12/08	Sara Provancha Project Manager Sioukas Investments 2277 Fair Oaks Boulevard, Suite 295 Sacramento, CA 95825 P: 916-648-1100 F: 916-648-1123 sara@sioukas.com	Oganization	Hotline	36-1		I work with a local property owner who has property in Metro Air Park. They are very interested in any additional and more up to date information you might have on the Downtown-Natomas-Airport project, other than what is available on the website. Last night's local news showed a community outreach meeting that took place and mentioned a 2017 completion date. We noticed in the draft EIR, a 2027 estimated completion date. If there is any documentation available that shows the 2017 estimated completion date, we would love to have access to it. This information is helpful as we discuss the development of our property in Metro Air Park with users and developers.

I17-1

Response to Comment I17-1

The Draft PEIR assumes a 2027 completion date for the DNA project. However, the actual completion date may vary depending on funding and the planning process. RT is committed to completing the DNA project as quickly as possible, however, at this time there is no set completion date.

Letter	Date	Name	Agency Type	Format	Comment #	Category	Comment
35	02/11/08	Roger McCardle 800 Cobble Cove Lane Sacramento, CA 95831 916-421-8005 rogersrcly@aol.com	Individual	Website	35-1		There is a light rail system in place, what are the economies of that operation? What does it cost to operate in addition to first cost? Without an accurate financial assessment it would be a huge mistake to blindly expand a system unless the numbers work. I suspect the reason it is never discussed in a public form is that it does not pencil out.

I18-1

Letter I18. Roger McCardle

Response to Comment I18-1

The Draft PEIR provides a section on Capital and Operation and Maintenance Costs (Table 2.8-2), and on Passenger Trips (Section 3.6.2 and 3.6.3). Regarding the operational costs: the report indicates that without the DNA investment, overall system costs would be $60.3 million per year for light rail, $119 million for bus, for a total of $179.3 million. With the DNA project, overall system costs would be: $74.9 million for light rail, $120.8 million for bus, for a total of $195.6 million. The benefit that can be attributed to the cost may be defined in boardings. The Draft PEIR, Section 3.6.3 states: "Transit ridership is often measured by the number of weekday passenger boardings on standard buses and trains. Looking at the year 2027, the total average weekday light rail boardings (without the DNA project) are projected to increase from 44,000 in 2005 to 91,970 under the no-project condition. This is due to expected growth in population and employment in the service area. With the DNA project, total average weekday transit boardings in 2027 are estimated at 111,850, an increase of nearly 20,000 boardings per weekday. This equates to 100,000 boardings per week, 400,000 boardings per month and over 5,000,000 boardings per year. RT and the Federal Transit Administration (the agency that oversees a significant part of the funding for the project) have stringent criteria that must to be met in order to qualify and be awarded funding. The DNA project is, and will be, competing with other similar project in the nation for funding. Each project is required to rate well in cost-effectiveness to be considered. In addition, RT will only build the service if it can be operated and maintained with the rest of the system.

Letter I19. Jarrod Baniqued

Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment
34	02/11/08	Jarrod Baniqued 37696 Highway 16, #1 Woodland, CA 95776 530-669-5925 Debora h.baniqued@sbcg	Individual	Website	34-1		How about if we extend the line into Woodland?

I19-1

Response to Comment I19-1

How to expand transit service to Elk Grove and other areas is a focal point of the Transit Master Plan update. Woodland and West Sacramento are not within Regional Transit's service area and would require joint planning with the agencies involved. Providing an aggressive transit system to accommodate project growth in the Sacramento region will require the development of new financial resources to construct and operate the system. Federal and state funding has been reduced in recent years. At this time, Regional Transit receives 1/6th of a cent from local sales taxes to fund the operation of the existing system. Existing funding will not allow RT to expand the system beyond the construction of the South Line Phase 2 project.

We are working on the second phase of the South Line from the existing Meadowview Station to Cosumnes River College. This project is planned to open for service in 2010 - 2011. The third phase of that project would extend light rail further south into the City of Elk Grove. RT in conjunction with The Cities of West Sacramento and Sacramento, and Yolo County Transportation District have completed a feasibility study for a streetcar extension between the two cities. Construction and operation of the streetcar service is contingent on identifying funding as well.

Letter I20. Brandon Stepp

Letter	Date	Name	Agency Type	Format	Comment #	Category	Comment
33	02/11/08	Brandonstepp6@hotmail.com	Individual	Website	33-1		I think that your initiative to speed up planned rail expansions is outstanding. I wish rail projects such as this would be expanded as quickly as possible all over the country.

I20-1

Response to Comment I20-1

Thank you for your comment. RT appreciates your support for the project.

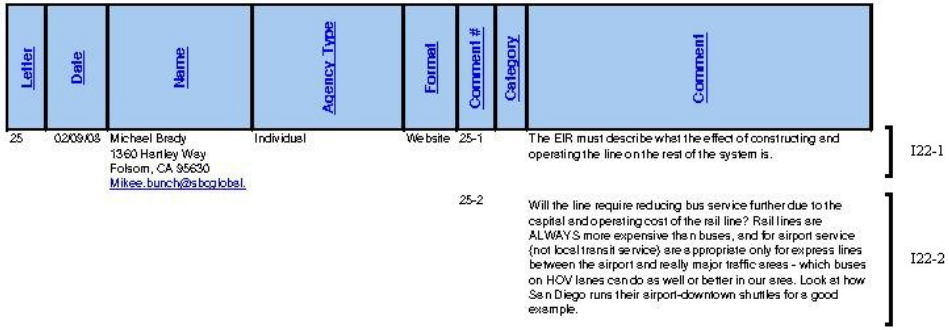
Letter I21. Michael Brady

Letter	Date	Name	Agency Type	Format	Comment #	Category	Comment
26	02/09/08	Michael Brady 1360 Hartley Way Folsom, CA 95630 Mikee.bunch@sbcglobal.net	Individual	Website	26-1		It's unrealistic to expect travelers to use LR to/from the airport. It stops too often and is too slow, feels if not is unsafe with many unsavory characters, and has no space for luggage. If airport access for travelers is necessary to justify the line, then you are overstating your case; if access is mainly for employees then you might have a better pitch. In my case, it would require more than 2 hours to get to the airport on LR (from Folsom), while drive time even in traffic is less than an hour - definitely not competitive.

I21-1

Response to Comment I21-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. Regional Transit is very sensitive to the issue of crime and, in response, security personnel and equipment are provided at stations, on vehicles and are on call if needed. In addition, security lighting is designed into stations, and active land uses are promoted near stops and stations. Regional Transit contracts with the City of Sacramento and Sacramento County for policing. The District employs Transit Officers as well as private security for station areas and on-board surveillance. In addition, please refer to Section 4.10, Public Safety and Security, for a discussion of the potential safety impacts of the DNA project.



Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment	
25	02/09/08	Michael Brady 1360 Hartley Way Folsom, CA 95630 Mikee.bunch@sbcglobal.	Individual	Website	25-1		The EIR must describe what the effect of constructing and operating the line on the rest of the system is.	I22-1
					25-2		Will the line require reducing bus service further due to the capital and operating cost of the rail line? Rail lines are ALWAYS more expensive than buses, and for airport service (not local transit service) are appropriate only for express lines between the airport and really major traffic areas - which buses on HOV lanes can do as well or better in our area. Look at how San Diego runs their airport-downtown shuttles for a good example.	I22-2

Letter I22. Michael Brady

Response to Comment I22-1

The Draft PEIR provides a section on Capital and Operation and Maintenance Costs (Table 2.8-2), and on Passenger Trips (Section 3.6.2 and 3.6.3). Regarding the operational costs: The report indicates that without the DNA investment, overall system costs would be $60.3 million per year for light rail, $119 million for bus, for a total of $179.3 million. With the DNA project, overall system costs would be: $74.9 million for light rail, $120.8 million for bus, for a total of $195.6 million. The benefit that can be attributed to the cost may be defined in boardings. The DNA PEIR, Section 3.6.3 states: "Transit ridership is often measured by the number of weekday passenger boardings on standard buses and trains. Looking at the year 2027, the total average weekday light rail boardings (without the DNA project) are projected to increase from 44,000 in 2005 to 91,970 under the no-project condition. This is due to expected growth in population and employment in the service area. With the DNA project, total average weekday transit boardings in 2027 are estimated at 111,850, an increase of nearly 20,000 boardings per weekday. This equates to 100,000 boardings per week, 400,000 boardings per month and over 5,000,000 boardings per year. RT and the Federal Transit Administration (the agency that oversees a significant part of the funding for the project) have stringent criteria that must to be met in order to qualify and be awarded funding. The DNA project is, and will be, competing with other similar project in the nation for funding. Each project is required to rate well in cost-effectiveness to be considered. In addition, RT will only build the service if it can be operated and maintained with the rest of the system.

Response to Comment I22-2

The Draft PEIR provides a section on Capital and Operation and Maintenance Costs (Table 2.8-2), and on Passenger Trips (Section 3.6.2 and 3.6.3). Regarding the operational costs: The report indicates that without the DNA investment (Baseline), overall system costs would be $60.3 million per year for light rail, $119 million for bus, for a total of $179.3 million (2006$). With the DNA project, overall system costs would be: $74.9 million for light rail, $120.8 million for bus, for a total of $195.6 million (2006$). The benefit that can be attributed to the cost may be defined in boardings. The Draft PEIR, Section 3.6.3 (page 3-40) states: "Transit ridership is often measured by the number of weekday passenger boardings on standard buses and trains. Looking at the year 2027, the total average weekday light rail boardings (without the DNA project) are projected to increase from 44,000 in 2005 to 91,970 [we are already over 50,000 in 2008] under the no-project condition. This is due to expected growth in population and employment in the service area. With the DNA project, total average weekday transit boardings in 2027 are estimated at 111,850, an increase of nearly 20,000 boardings per weekday. This equates to 100,000 boardings per week, 400,000 boardings per month and over 5,000,000 boardings per year. Regional Transit and the Federal Transit Administration (the agency that oversees a significant part of the funding for the project) have stringent criteria that must to be met in order to qualify and be awarded funding. The DNA project is, and will be, competing with other similar project in the nation for funding. Each project is required to rate well in cost-effectiveness to be considered. In addition, Regional Transit will only build the service if it can be operated and maintained with the rest of the system.

Letter I23. Anastasia Small.

Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment
24	02/09/08	Anastasia Small 12633 Fair Oaks Boulevard Citrus Heights, CA 95610 916-745-3487	Individual	Website	24-1		I am highly in favor of the RT light rail service being extended to the Sacramento International Airport.

I23-1

Response to Comment I23-1

Thank you for your comment. RT appreciates your support for the project.

Letter - I24. global1recrutr@yahoo.com

Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment	
2	12/29/07	info@bikers-outpost.com	Individual	Email	2-1		To Whom It May Concern: I would like to be placed on your DNA mailing list but for email only. You can email me at global1recrutr@yahoo.com	I24-1
					2-2		I would also like to express my opinion on the current route. I think that your plan shows an extreme lack of judgment. It is guaranteed to overload an already traffic snarled situation on Truxel and Del Paso Rd. Where you guys smoking crack when you came up with this or what????	I24-2
					2-3		Every single resident in this area that I have talked to does not want the transit here. And yet, you continue to slam it down our throats. We already have access to the airport via cab or shuttle. I can take a semi-private shuttle ride for $11. WHY WOULD I WANT TO GET ON PUBLIC TRANSIT WITH GOD KNOWS WHO AND SMELL THE STENCH OF THE RANCID BODY ODOR????	I24-3

Response to Comment I24-1

Information added to database.

Response to Comment I24-2

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

Response to Comment I24-3

The DNA Alternatives Analysis has had many public workshops, open houses and public meetings where people have had opportunity to speak and share input on the project. The Draft EIR was scoped through such a public meeting process as well. When the Project EIR is initiated on the DNA MOS-1 project from 7th Street to Richards Boulevard, a public meeting will help to establish the parameters of that study as well. In addition, please see response to Comment I24-2.

Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment	
					2-4		If you feel you must provide it for low income, think again. Persons needing subsidized housing would not be able to afford air travel. If they can, then maybe their income should be revisited. I will be watching this very closely. I personally plan to fight you all the way. I will also get as many people involved as possible to fight it. I will begin with my group, the RPNA and branch out. I will look into legal channels to stop this also.	I24-4
					2-5		Why don't you just run it past the I5 instead of right through our neighborhoods? Are you being paid off by the retail establishments en route?? There is absolutely no doubt that the transit will lower property values. Go ahead, try to argue with me on this one. Just look at the blight in all the areas that the transit currently goes. There is absolutely nothing that the transit can offer that would make me want to trade my neighborhood in it's current condition for the condition it would be in after transit was installed.	I24-5

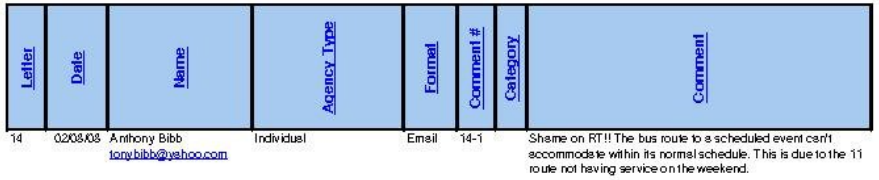
Response to Comment I24-4

Comment noted. Please see responses to Comments I24-2 and I24-3.

Response to Comment I24-5

Comment noted. Please see responses to Comments I24-2, I24-3, and I4-1.

Letter I25. Anthony Bibb.



Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment
14	02/08/08	Anthony Bibb tonybibb@yahoo.com	Individual	Email	14-1		Shame on RT!! The bus route to a scheduled event can't accommodate within its normal schedule. This is due to the 11 route not having service on the weekend.

I25-1

Response to Comment I25-1

Comment noted. Regional Transit is aware of the need to provide more transit service for the North Natomas area in general. However, funding constraints caused by a reduction of federal and state funds resulted in a reduction in bus service in 2008. The Transit Master Plan update work program that is underway will seek ways to improve service throughout the region. One task requires the consultant team to review overall service to see if efficiencies can be found that can be used o provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions. The Transit Master Plan update will examine transit development scenarios that will include expanded service, including bus, BRT, streetcar, light rail and other options.

Letter I26. Sabas Chois

Letter	Date	Name	Agency Type	Formal	Comment #	Category	Comment
13	02/08/08	Sabas Chois 5424 Miriam Court Carmichael, CA 95608 slcspsm@yahoo.com	Individual	Hotline	13-1		I think you should consider in the design the potential of extending the line all the way into Woodland. The airport would be a stop along the way to Woodland. So the egress into the airport should be such that it will lend itself to be used as a stop rather than the final destination.

I26-1

Response to Comment I26-1

How to expand transit service to Elk Grove and other areas is a focal point of the Transit Master Plan update. Woodland and West Sacramento are not within Regional Transit's service area and would require joint planning with the agencies involved. Providing an aggressive transit system to accommodate project growth in the Sacramento region will require the development of new financial resources to construct and operate the system. Federal and state funding has been reduced in recent years. At this time, Regional Transit receives 1/6th of a cent from local sales taxes to fund the operation of the existing system. Existing funding will not allow RT to expand the system beyond the construction of the South Line Phase 2 project.

We are working on the second phase of the South Line from the existing Meadowview Station to Cosumnes River College. This project is planned to open for service in 2010 - 2011. The third phase of that project would extend light rail further south into the City of Elk Grove. RT in conjunction with The Cities of West Sacramento and Sacramento, and Yolo County Transportation District have completed a feasibility study for a streetcar extension between the two cities. Construction and operation of the streetcar service is contingent on identifying funding as well.

Letter I58. Beverley Louie

Letter	Date	Name	Agency Type	Format	Comment #	Comment	
55	02/25/08	Beverley Louie 1590 Brewerton Drive Sacramento, CA 95833 (916) 641-8852 blouie@edd.ca.gov	Individual	Website	55-1	In the long run, it would be worth it to spend a little more to have the DNA light rail built along I-5 which will alleviate traffic congestion. San Diego (next to freeway) and San Francisco (underground) does not experience congestion like the light rail system in Sacramento.	I58-1
					55-2	Truxel Road is a quiet, narrow street building a lightrail there would make it a traffic nightmare! There is going to be more noise for for the homes, especially since I live right on the corner of Truxel Road. Are there any plans for sound barriers?	I58-2
					55-3	I also ride my bike to Discovery Park on Truxel. It would be totally unsafe to have the lightrail going down Truxel Road there every 10-15 minutes.	I58-3
					55-4	Besides, who's going to lug their luggages on the light rail to the airport? Will here be bell hops? If I were flying into Sacramento, I want to get to my hotel or meeting downtown asap, not stopping through the neighborhoods in Natomas.	I58-4

Response to Comment I58-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

Response to Comment I58-2

As stated on page 4.13-10 and 4.13-11 of the Draft PEIR,

"In South Natomas, noise levels at first-row residences would increase by approximately 1 dBA over existing noise levels due to the operation of the DNA project. At receivers along Truxel Road, project noise levels would be lower than the impact criteria."

The operation of the DNA project along Truxel Road does not result in a significant noise impact based on the FTA noise impact criteria used as the significance criteria in the PEIR. Please refer Section 4.13, Noise and Vibration for a discussion of all potential noise impacts of

the DNA project (Figure 4.13-4 through 4.13-7 show existing and post-project noise levels at noise-sensitive areas along the alignment in South Natomas). In addition, future project-level engineering and environmental review will provide an opportunity to further evaluate, and mitigate if necessary, potential noise impacts along Truxel Road.

Response to Comment I58-3

Most of the right-of-way for the project is in or adjacent to City streets, where pedestrian facilities and bikeways are often provided. Light rail tracks in public streets are a common occurrence in Sacramento, and are one of many things bicyclists must be aware of, including buses, automobiles, trucks, parked cars, debris, and potholes. Please refer to Section 4.10, Public Safety and Security, of the Draft PEIR for a discussion of all potential safety impacts of the DNA project.

Response to Comment I58-4

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding. Details regarding service and operation of the DNA project will be determined during future project-level engineering and environmental review.

Don Smith - promo & DNA

From: "Von Aspern. David" <VonAspernD@saccounty.net>
To: <mwiley@sacrt.com>
Date: 2/26/2008 12:11 PM
Subject: promo & DNA

CONGRATULATIONS!!, Mr. General Manager.

This turned out exactly as I hoped it would.

While I have your attention:

CO2-1 Although on the following topic I am in the minority on the Board of the Natomas Community Association: please know that I fully support the DNA line. The sooner it's built, the better. The only thing that I would implore RT to do is to build a grade separation at Truxel/Natomas Marketplace/Gateway Park Blvd.

If it's not too late to do any good, please forward this memo of support of DNA to the appropriate RT staff.

Residence, if you need it for DNA tracking purposes: 3009 Funston Dr. Sacto, CA 95833 cell # 591-2679.

David L. Von Aspern
Senior Environmental Specialist
Sacramento County Env. Mngt. Dept.,
Water Protection Division
8475 Jackson Road, Suite 230
Sacramento, CA 95826
direct ph. 916-875-8467; fax 875-8513
email: VonAspernD@saccounty.net

Letter I59. David Von Aspern

Response to Comment I59-1

Thank you for your comment. RT appreciates your support for the project. Details of the DNA project alignment will be determined during project-level engineering and design, including potential grade separation at Truxel/Natomas Marketplace/Gateway Park Blvd.

ORIGINAL

DOWNTOWN NATOMAS AIRPORT PROJECT

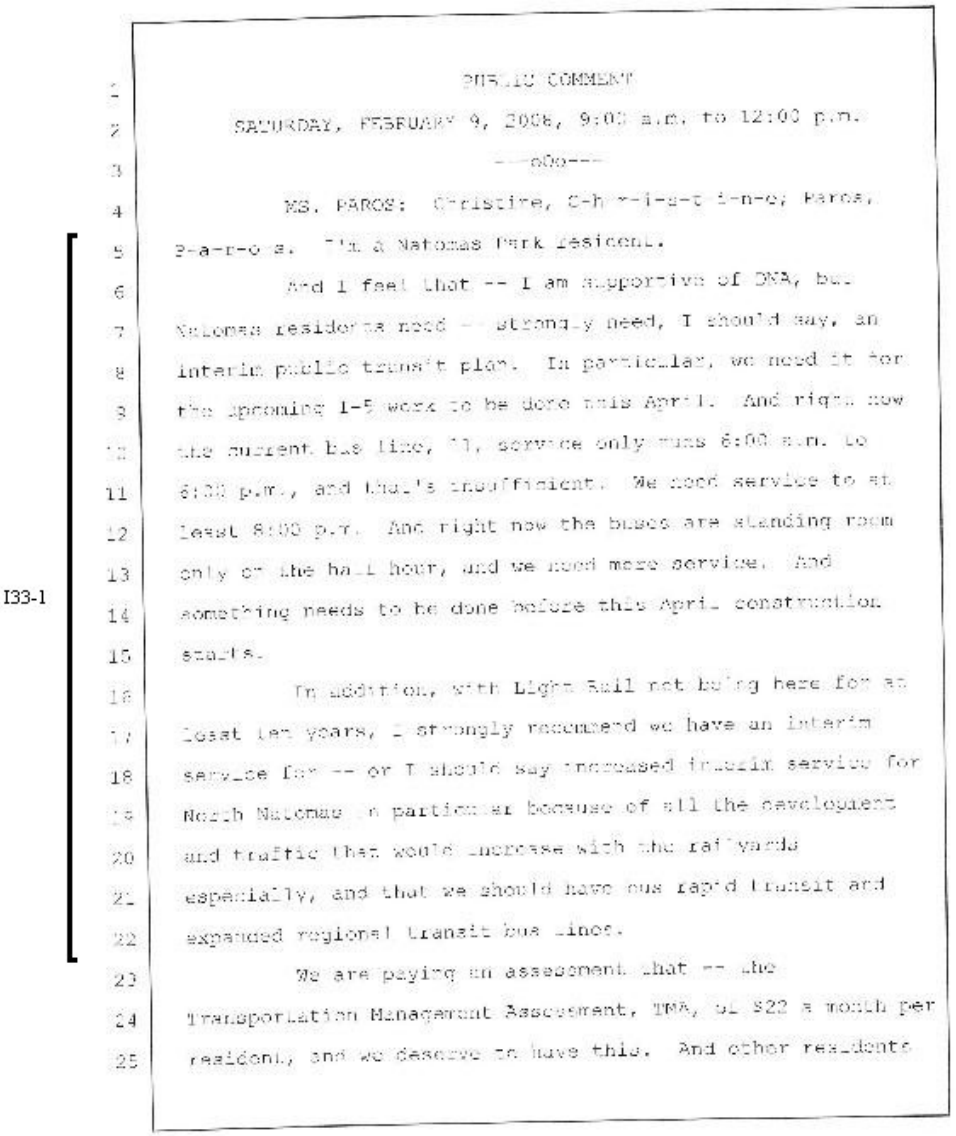
PUBLIC COMMENT

Location: Inderkum High School
2500 New Market Drive
Sacramento, California

Date: Saturday, February 9, 2008

Reported By: SANDRA L. KOPPER, CSR 7110

Public Hearing – February 9, 2008



DNS.IO COMMENT

SATURDAY, FEBRUARY 9, 2008, 9:00 a.m. to 12:00 p.m.

---oOo---

MS. PAROS: Christine, C-h-r-i-s-t-i-n-e; Paros, P-a-r-o-s. I'm a Natomas Park resident.

And I feel that -- I am supportive of DNA, but Natomas residents need -- strongly need, I should say, an interim public transit plan. In particular, we need it for the upcoming I-5 work to be done this April. And right now the current bus line, 11, service only runs 6:00 a.m. to 6:30 p.m., and that's insufficient. We need service to at least 8:00 p.m. And right now the buses are standing room only on the half hour, and we need more service. And something needs to be done before this April construction starts.

In addition, with Light Rail not being here for at least ten years, I strongly recommend we have an interim service for -- or I should say increased transit service for North Natomas in particular because of all the development and traffic that would increase with the railyards especially, and that we should have bus rapid transit and expanded regional transit bus lines.

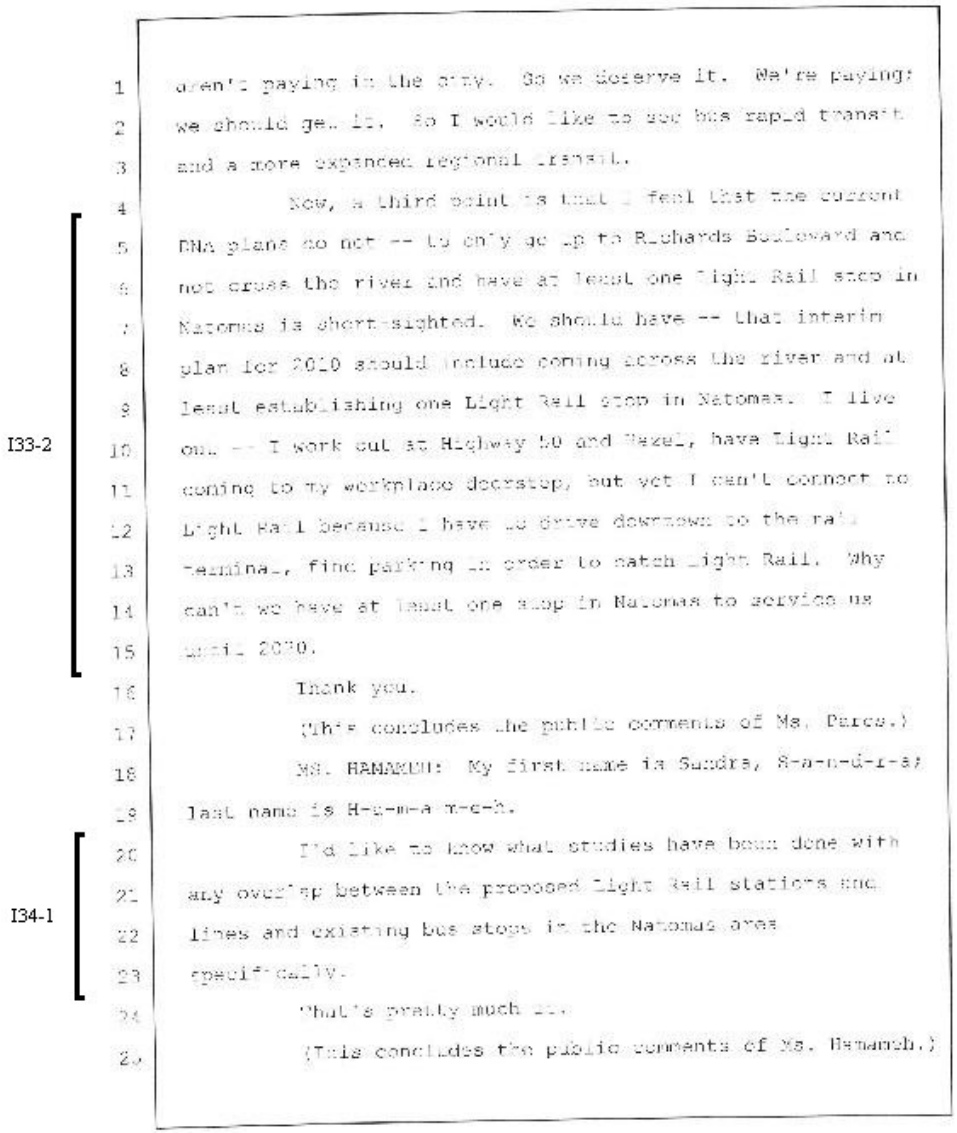
We are paying an assessment that -- the Transportation Management Assessment, TMA, of $22 a month per resident, and we deserve to have this. And other residents

I33-1

Response to Comment I33-1

Regional Transit is working with Caltrans to identify resources to provide additional interim bus service for the routes affected by the I-5 rehabilitation project. Additional service may include extended hours and more frequency of service. At this time no additional resources have been identified.

Regional Transit is aware of the need to provide more transit service for the North Natomas area in general. However, funding constraints caused by a reduction of federal and state funds resulted in a reduction in bus service in 2008. The Transit Master Plan update work program that is underway will seek ways to improve service throughout the region. One task requires the consultant team to review overall service to see if efficiencies can be found that can be used to provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions. The Transit Master Plan update will examine transit development scenarios that will include expanded service, including bus, BRT, streetcar, light rail and other options.



aren't paying in the city. So we deserve it. We're paying; we should get it. So I would like to see bus rapid transit and a more expanded regional transit.

Now, a third point is that I feel that the current DNA plans do not -- to only go up to Richards Boulevard and not cross the river and have at least one Light Rail stop in Natomas is short-sighted. We should have -- that interim plan for 2010 should include coming across the river and at least establishing one Light Rail stop in Natomas. I live one -- I work out at Highway 50 and Hazel, have Light Rail coming to my workplace doorstep, but yet I can't connect to Light Rail because I have to drive downtown to the rail terminal, find parking in order to catch Light Rail. Why can't we have at least one stop in Natomas to service us until 2030.

I33-2

Thank you.

(This concludes the public comments of Ms. Parra.)

MS. HAMAMOTO: My first name is Sandra, S-a-n-d-r-a; last name is H-a-m-a-m-o-t-o.

I'd like to know what studies have been done with any overlap between the proposed Light Rail stations and lines and existing bus stops in the Natomas area specifically.

I34-1

That's pretty much it.

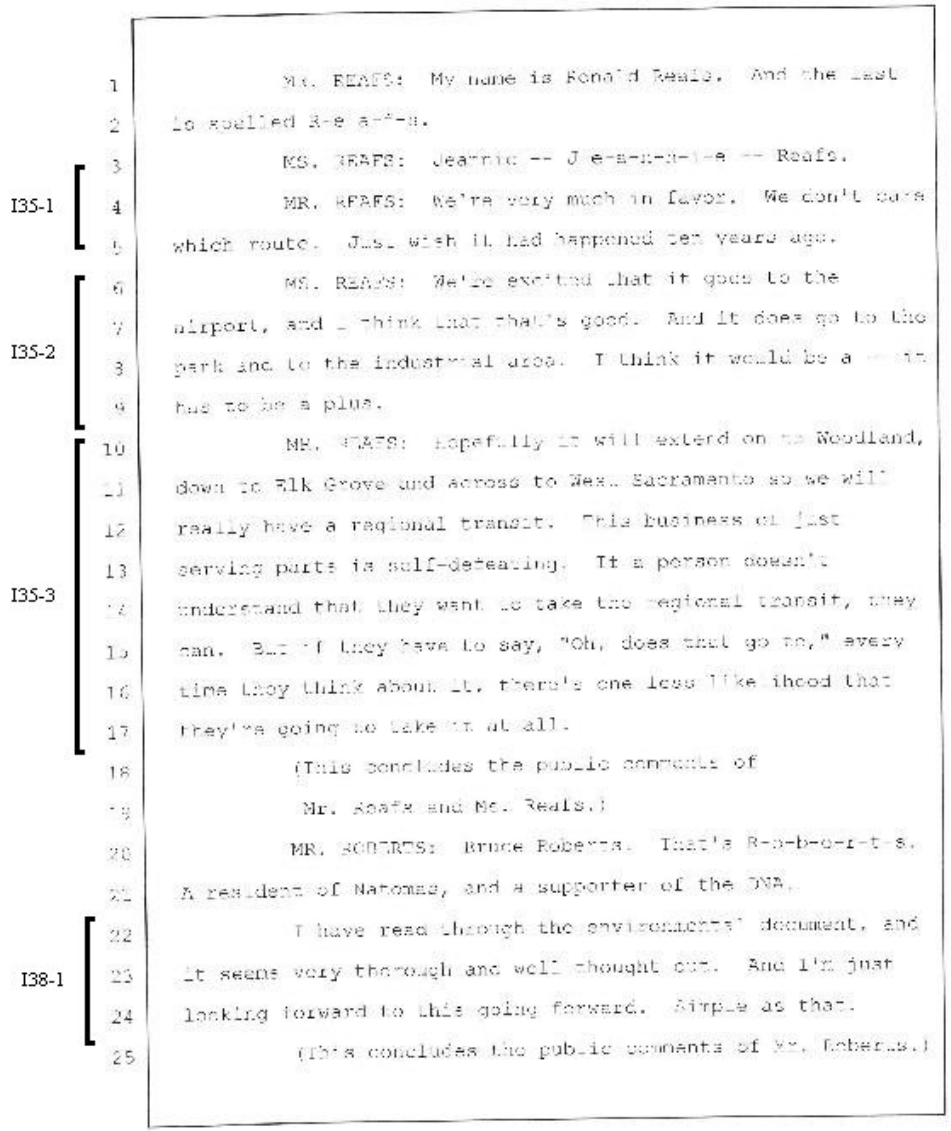
(This concludes the public comments of Ms. Hamamoto.)

Response to Comment I33-2

Financial constraints preclude RT from crossing the river as part of MOS-1.

Response to Comment I34-1

In the Alternatives Analysis phase, RT considered potential changes to bus service and bus stop locations in Natomas and the entire the DNA corridor. Bus and LRT service will complement each other, offering an integrated system



Ms. REAFS: My name is Ronald Reals. And the last is spelled R-e a-^-s.

MS. REAFS: Jeanric -- J-e-a-n-n-i-e -- Reafs.

MR. REAFS: We're very much in favor. We don't care which route. Just wish it had happened ten years ago.

MS. REALS: We're excited that it goes to the airport, and I think that that's good. And it does go to the park and to the industrial area. I think it would be a -- it has to be a plus.

MR. REALS: Hopefully it will extend on to Woodland, down to Elk Grove and across to West Sacramento so we will really have a regional transit. This business of just serving parts is self-defeating. If a person doesn't understand that they want to take the regional transit, they can. But if they have to say, "Oh, does that go to," every time they think about it, there's one less likelihood that they're going to take it at all.

(This concludes the public comments of Mr. Reafs and Ms. Reals.)

MR. ROBERTS: Bruce Roberts. That's R-o-b-e-r-t-s. A resident of Natomas, and a supporter of the DNA.

I have read through the environmental document, and it seems very thorough and well thought out. And I'm just looking forward to this going forward. Simple as that.

(This concludes the public comments of Mr. Roberts.)

I35-1

I35-2

I35-3

I38-1

Response to Comment I35-1

Thank you for your comment. RT appreciates your support for the project.

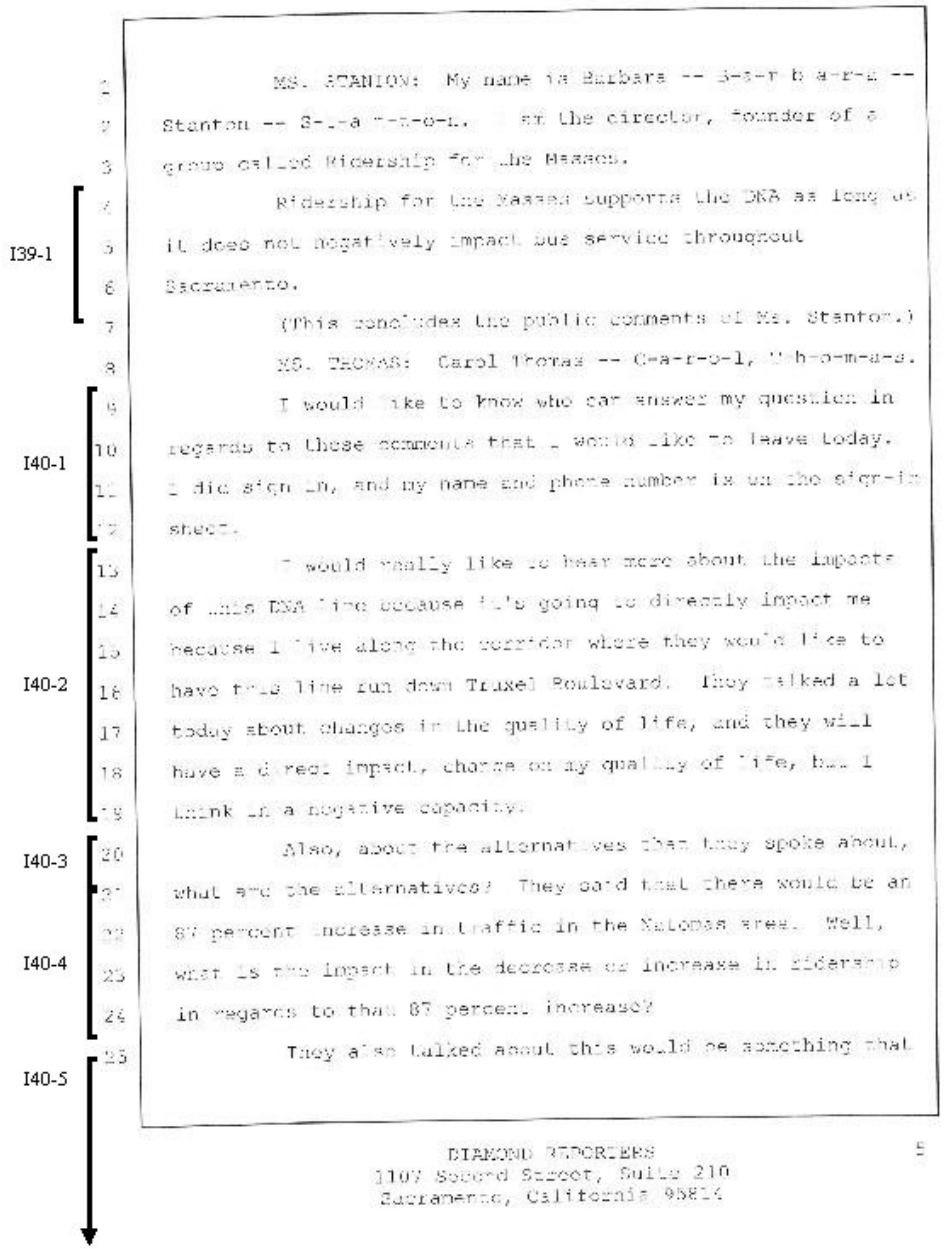
Response to Comment I35-2

Thank you for your comment. RT appreciates your support for the project.

Response to Comment I35-3

How to expand transit service to Elk Grove and other areas is a focal point of the Transit Master Plan update. Woodland and West Sacramento are not within Regional Transit's service area and would require joint planning with the agencies involved. Providing an aggressive transit system to accommodate project growth in the Sacramento region will require the development of new financial resources to construct and operate the system. Federal and state funding has been reduced in recent years. At this time, Regional Transit receives 1/6th of a cent from local sales taxes to fund the operation of the existing system. Existing funding will not allow RT to expand the system beyond the construction of the South Line Phase 2 project.

We are working on the second phase of the South Line from the existing Meadowview Station to Cosumnes River College. This project is planned to open for service in 2010 - 2011. The third phase of that project would extend light rail further south into the City of Elk Grove. RT in conjunction with The Cities of West Sacramento and Sacramento, and Yolo County Transportation District has completed a feasibility study for a streetcar extension between the two cities. Construction and operation of the streetcar service is contingent on identifying funding as well.



MS. STANION: My name is Barbara -- S-t-a-r b a-r-a -- Stanton -- S-t-a n-t-o-n. I am the director, founder of a group called Ridership for the Masses.

Ridership for the Masses supports the DNA as long as it does not negatively impact bus service throughout Sacramento.

(This concludes the public comments of Ms. Stanton.)

MS. THOMAS: Carol Thomas -- C-a-r-o-l, T-h-o-m-a-s.

I would like to know who can answer my question in regards to these comments that I would like to leave today. I did sign in, and my name and phone number is on the sign-in sheet.

I would really like to hear more about the impacts of this DNA line because it's going to directly impact me because I live along the corridor where they would like to have this line run down Truxel Boulevard. They talked a lot today about changes in the quality of life, and they will have a direct impact, change on my quality of life, but I think in a negative capacity.

Also, about the alternatives that they spoke about, what are the alternatives? They said that there would be an 87 percent increase in traffic in the Natomas area. Well, what is the impact in the decrease or increase in ridership in regards to that 87 percent increase?

They also talked about this would be something that

I39-1

I40-1

I40-2

I40-3

I40-4

I40-5

Response to Comment I38-1

Thank you for your comment. RT appreciates your support for the project

Response to Comment I39-1

Thank you for your comment. RT appreciates your support for the project. In addition, please refer to response to Comment I33-1.

Response to Comment I40-1

Comment noted. All comments submitted to RT during the public comment period will be responded to in the Final PEIR by RT's DNA project team.

Response to Comment I40-2

Comment noted. Please refer to the PEIR for a discussion of all potential impacts associated with the DNA project.

Response to Comment I40-3

For a full description of all project alternatives considered, please refer to the Alternatives Analysis included as Appendix A in the PEIR.

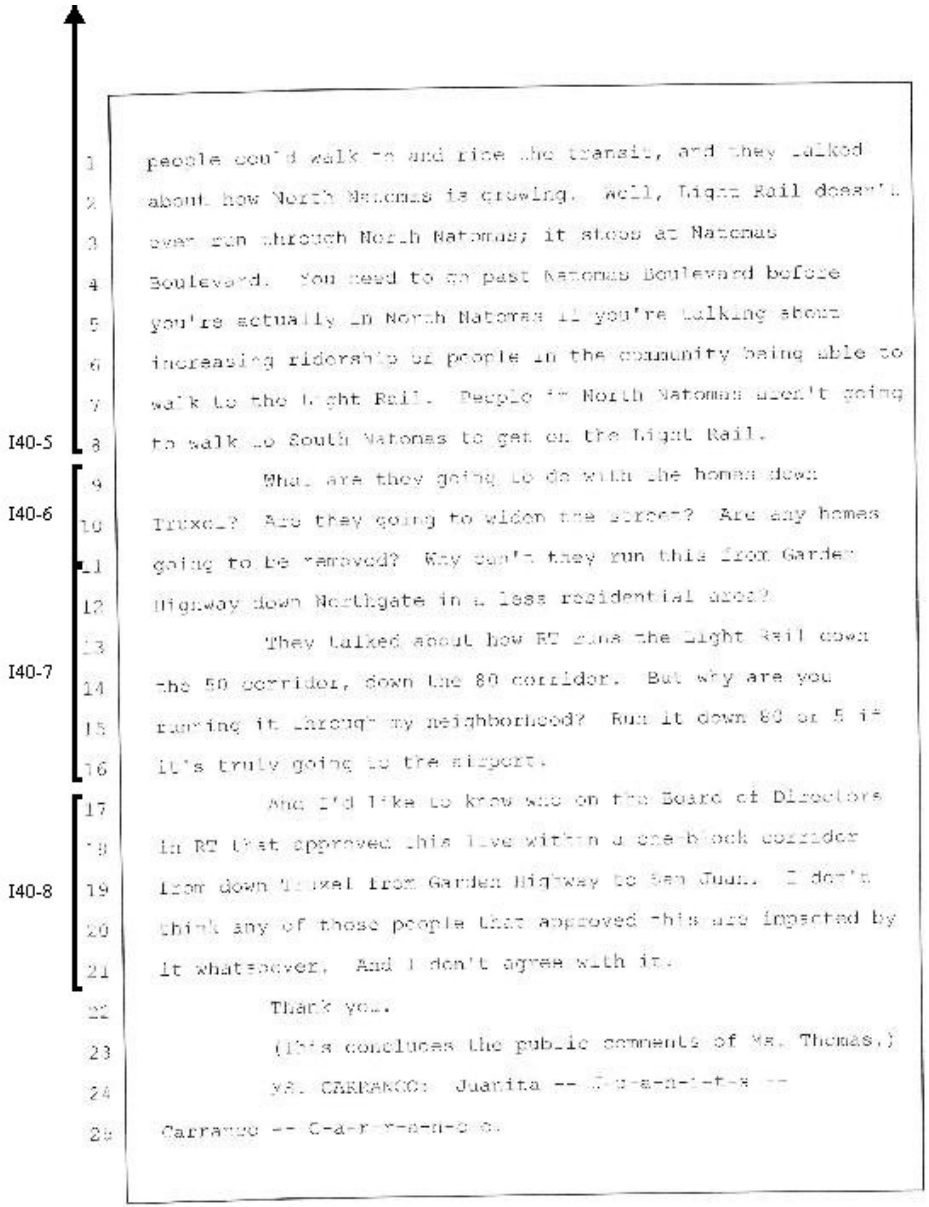
Response to Comment I40-4

The commenter reports hearing that there will be an increase in traffic in the Natomas area. As the population in the region grows, traffic levels can be expected to increase. Transit ridership will also increase. Table 3.6-8 of Chapter 3.0 in the Draft PEIR shows average weekday transit boardings are forecasted to increase from 139,740 in 2005 to more than 258,900 by 2027 under the future no-project condition. This significant increase in transit ridership is attributed to the expected population and employment growth in the service area as well as the availability of new lines. With implementation of the DNA project, average weekday transit boardings are expected to increase by more than 19,700 compared to the future no-project condition. This significant increase in transit ridership is attributed directly to improvements to the transit system included in the DNA project.

Response to Comment I40-5

As described in Chapter 2, Project Description, page 2-7, of the PEIR, the DNA project alignment does serve the residents of North Natomas:

> "After crossing Del Paso Road, the alignment would proceed north along Natomas Boulevard (north of Del Paso Road, Truxel Road changes name to Natomas Boulevard). At New Market Drive, the alignment would turn northwest and proceed in the median around the Natomas Town Center Education Complex toward the Natomas Town Center. West of the Town Center, the alignment would again turn north and follow East Commerce Parkway in a semi-exclusive right-of-way adjacent to the east side of the roadway. At the intersection of Club Center Drive and East Commerce Parkway, the alignment would cross East Commerce Parkway at-grade and enter an exclusive transit right-of-way to reach SR 99 at the proposed Meister Way overcrossing."



people could walk to and ride the transit, and they talked about how North Natomas is growing. Well, Light Rail doesn't even run through North Natomas; it stops at Natomas Boulevard. You need to go past Natomas Boulevard before you're actually in North Natomas if you're talking about increasing ridership by people in the community being able to walk to the Light Rail. People in North Natomas aren't going to walk to South Natomas to get on the Light Rail.

I40-5

What are they going to do with the homes down Truxel? Are they going to widen the street? Are any homes going to be removed? Why can't they run this from Garden Highway down Northgate in a less residential area?

I40-6

They talked about how RT runs the Light Rail down the 50 corridor, down the 80 corridor. But why are you running it through my neighborhood? Run it down 80 or 5 if it's truly going to the airport.

I40-7

And I'd like to know who on the Board of Directors in RT that approved this live within a one-block corridor from down Truxel from Garden Highway to San Juan. I don't think any of those people that approved this are impacted by it whatsoever. And I don't agree with it.

I40-8

Thank you.

(This concludes the public comments of Ms. Thomas.)

MS. CARRANCO: Juanita -- J-u-a-n-i-t-a --

Carranco -- C-a-r-r-a-n-c-o.

Response to Comment I40-6

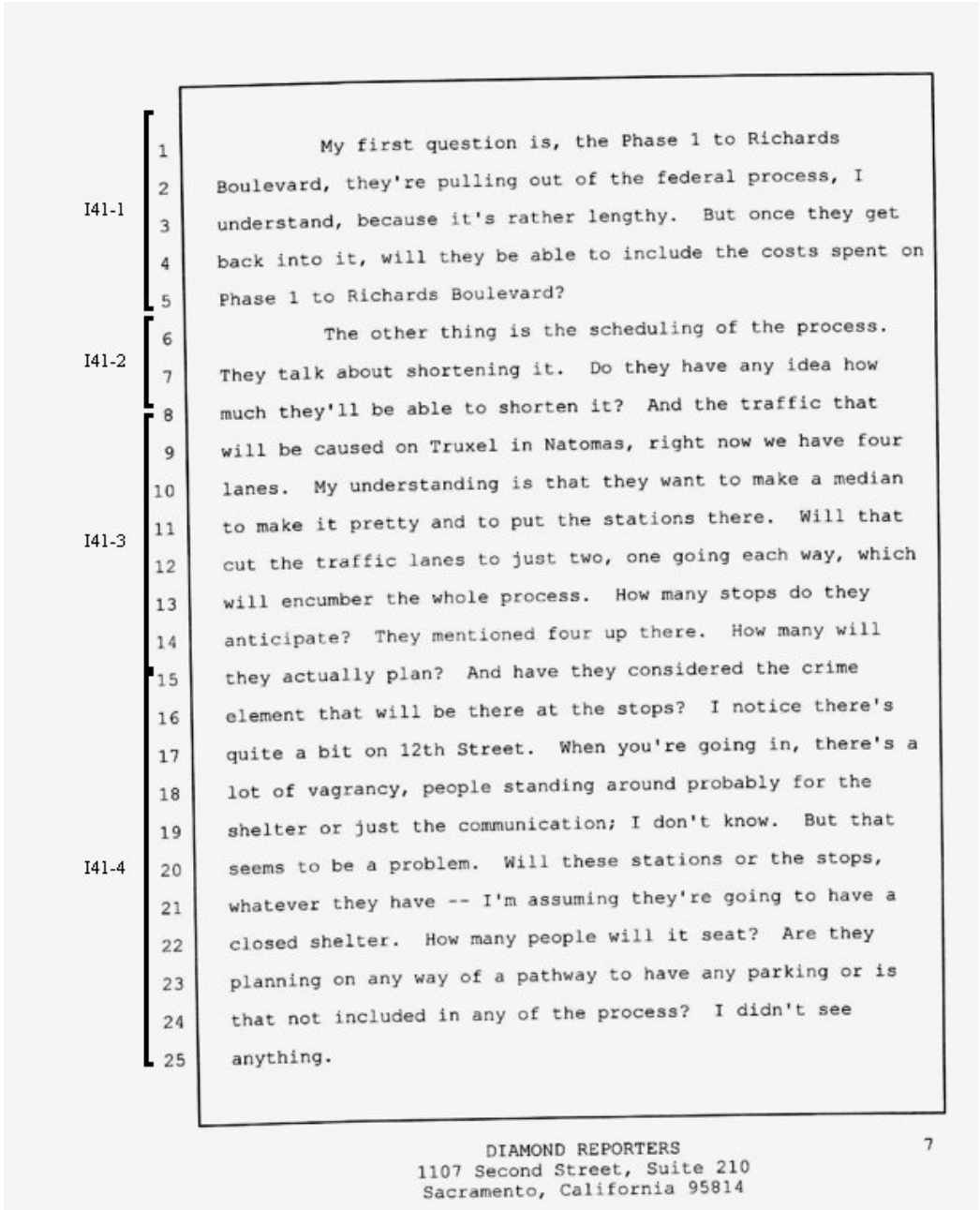
As far as potential taking of property is concerned, RT is operating under the direction of their Board of Directors, including the instruction not to take any residential property to facilitate this project. The alignment along Truxel Road is therefore specifically designed to avoid the taking of residential properties. Please refer to Chapter 3.0, Transportation and Circulation, and Section 4.6, Property Acquisition and Displacement, of the Draft PEIR for a complete discussion of DNA project impacts.

Response to Comment I40-7

The Northgate alignment was studied in 2001, in the original Alternatives Analysis (included as Appendix A of the PEIR) that produced the current LPA along Truxel Rd. In the AA, the Northgate alignment was shown to reduce the construction costs only fractionally because the river crossing would have to be rebuilt. The operating costs of the Northgate alignment would have been higher, the distance to the airport would have been longer, and the line would have served far fewer business and apartment residences. Thus, the line's cost-effectiveness would have been much reduced. As it is, the Truxel Road alignment will serve many businesses, schools, the public library, and several apartment developments that would no be served by keeping the light rail in industrial areas.

Response to Comment I40-8

Comment noted. The next phases of the project, including the alignment along Truxel, will require additional environmental review and engineering. Each of the phases will be subject to additional public review and comment. More detailed information on these phases will be provided as it becomes available.



I41-1

My first question is, the Phase 1 to Richards Boulevard, they're pulling out of the federal process, I understand, because it's rather lengthy. But once they get back into it, will they be able to include the costs spent on Phase 1 to Richards Boulevard?

I41-2

The other thing is the scheduling of the process. They talk about shortening it. Do they have any idea how much they'll be able to shorten it? And the traffic that will be caused on Truxel in Natomas, right now we have four lanes. My understanding is that they want to make a median to make it pretty and to put the stations there. Will that

I41-3

cut the traffic lanes to just two, one going each way, which will encumber the whole process. How many stops do they anticipate? They mentioned four up there. How many will they actually plan? And have they considered the crime element that will be there at the stops? I notice there's quite a bit on 12th Street. When you're going in, there's a lot of vagrancy, people standing around probably for the shelter or just the communication; I don't know. But that

I41-4

seems to be a problem. Will these stations or the stops, whatever they have -- I'm assuming they're going to have a closed shelter. How many people will it seat? Are they planning on any way of a pathway to have any parking or is that not included in any of the process? I didn't see anything.

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Response to Comment I41-1

RT hopes that its investment in MOS-1 will count as local match toward a Federal grant for subsequent phases, but this is not assured.

Response to Comment I41-2

RT expects to be ready to start construction on MOS-1 in 2009. If RT had pursued Federal New Starts funding, it is unlikely that construction could have started for another three or four years, and possibly longer.

Response to Comment I41-3

The project description in the Draft PEIR reflects certain assumptions about the light rail alignment and the location of future stations. While no specific design option for light rail operations on Truxel Road have been selected, a potential range of options, including mixed flow, were included for evaluation at the program-level (please refer to Chapter 3.0, Transportation and Circulation, of the Draft PEIR). Future project-level engineering and environmental review will provide an opportunity to further evaluate and refine track alignments along Truxel Road.

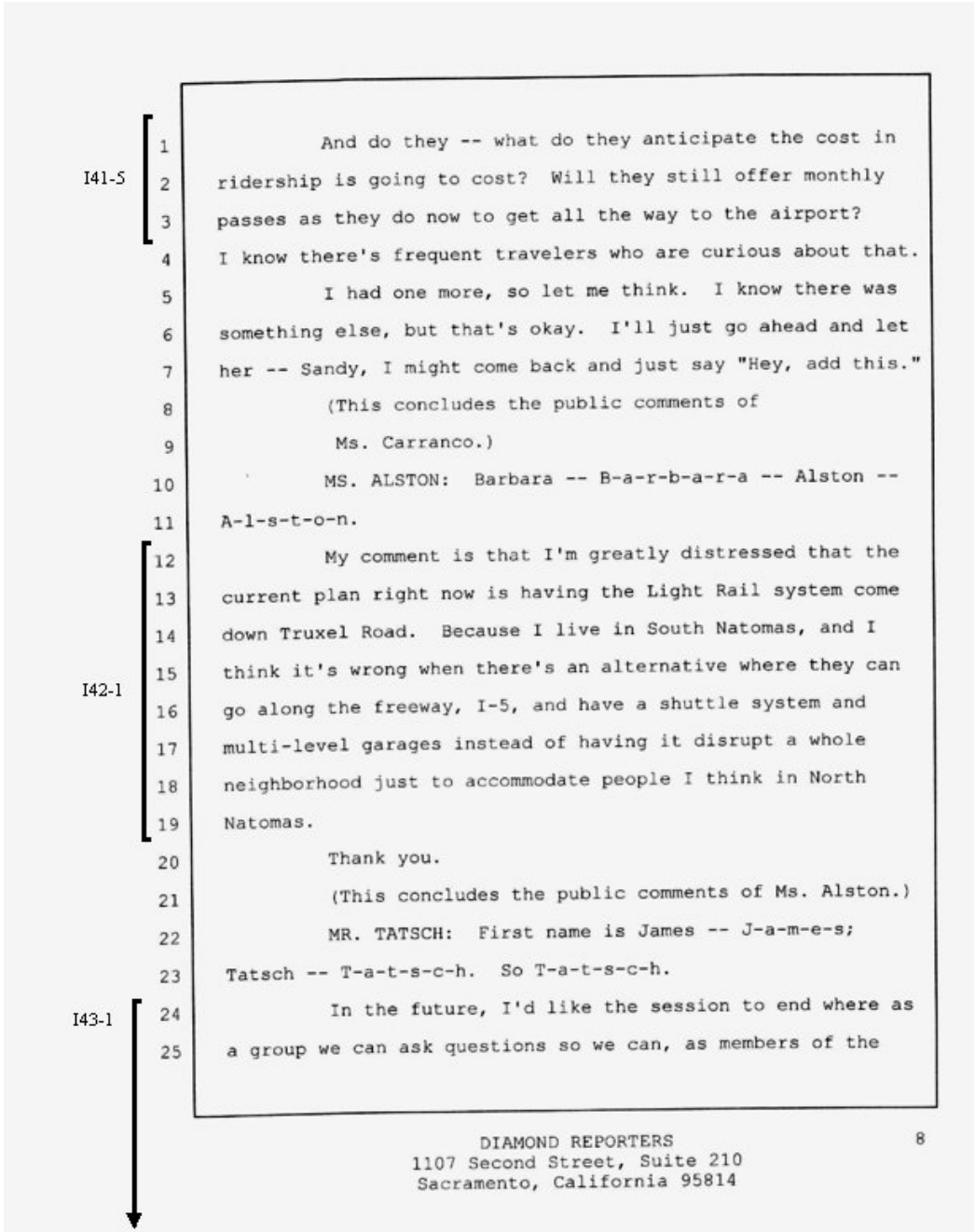
Response to Comment I41-4

Increased crime has been raised as an issue during open house meetings on the project. The perception of crime has been a concern in Sacramento, and in other cities with light rail systems. There are several studies that document the impact rail stations have on

neighborhood crime. Plano (1993) investigated crime rates before and after the opening of light rail stations on the Baltimore Metro. Of these stations investigated, none were linked to an increase in crime. In a similar study, Poister (1996) examined the increase of crime before and after the opening of two stations in the Metropolitan Atlanta Rapid Transit Authority (MARTA). As with Plano (1993), no significant relationship linking crime and rail transit was identified. (Sources: Plano, S.L. 1993, “Transit Generated Crime: Perception vs. Reality…” Public Transit: Current Research in Planning, Marketing, Operations and Technology.; poister. T.H. 1996, “Transit Related Crimes in Suburban Areas”, Journal of Urban Affairs.)

Those studies have found that crime at light rail stations generally reflects or parallels the level crime in the surrounding neighborhood. An example where light rail and RT Police have had a positive impact is (in 2007), a County Sheriff, assigned to Regional Transit stopped and searched a young man on the way to a nearby high school. The officer found a gun in the boy's backpack. He was on his way to the school with the intent to use it. A tragedy was averted by the additional policing of the area. Regional Transit is very sensitive to the issue of crime and, in response, security personnel and equipment are provided at stations, on vehicles and are on call if needed. In addition, security lighting is designed into stations, and active land uses are promoted near stops and stations. Regional Transit contracts with the City of Sacramento and Sacramento County for policing. The District employs Transit Officers as well as private security for station areas and on-board surveillance.

They will be modern transit stations which typically have lighting, seating, landscaping, fare vending machines, security cameras, information kiosk, and bicycle parking. Seating areas are typically open. The amount of seating varies at each station. Newer stations may be viewed along the existing system. Pathways will likely be city sidewalks and bicycle lanes. Some of the stations may have park and ride facilities. The first leg, MOS-1 is envisioned to have parking in the North 7th Street/Richards Boulevard area. Details on these facilities will be clarified in the next phase of study.



And do they -- what do they anticipate the cost in ridership is going to cost? Will they still offer monthly passes as they do now to get all the way to the airport? I know there's frequent travelers who are curious about that.

I had one more, so let me think. I know there was something else, but that's okay. I'll just go ahead and let her -- Sandy, I might come back and just say "Hey, add this."

(This concludes the public comments of Ms. Carranco.)

MS. ALSTON: Barbara -- B-a-r-b-a-r-a -- Alston -- A-l-s-t-o-n.

My comment is that I'm greatly distressed that the current plan right now is having the Light Rail system come down Truxel Road. Because I live in South Natomas, and I think it's wrong when there's an alternative where they can go along the freeway, I-5, and have a shuttle system and multi-level garages instead of having it disrupt a whole neighborhood just to accommodate people I think in North Natomas.

Thank you.

(This concludes the public comments of Ms. Alston.)

MR. TATSCH: First name is James -- J-a-m-e-s; Tatsch -- T-a-t-s-c-h. So T-a-t-s-c-h.

In the future, I'd like the session to end where as a group we can ask questions so we can, as members of the

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I41-5

I42-1

I43-1

Response to Comment I41-5

RT's travel demand forecasts assume that existing fare policies (including passes) will apply to the DNA project. Although it is assumed that fare levels will be adjusted for inflation, the average fixed route fare does not change in real terms.

Response to Comment I42-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

Response to Comment I43-1

The DNA Alternatives Analysis has had many public workshops, open houses and public meetings where people have had opportunity to speak and share input on the project. There have been approximately 300 meetings including: 128 Public Meetings (scoping, briefings, Technical Review Panel, Community Review Panel, presentations to neighborhood associations, etc.); 122 Agency Meetings; and 49 Stakeholder Meetings.

I43-1

audience, hear what issues are concerning others rather than breaking up into small groups and not being able to hear everything.

(This concludes the public comments of Mr. Tatsch.)

(The public comment period was concluded at 12:00 p.m.)

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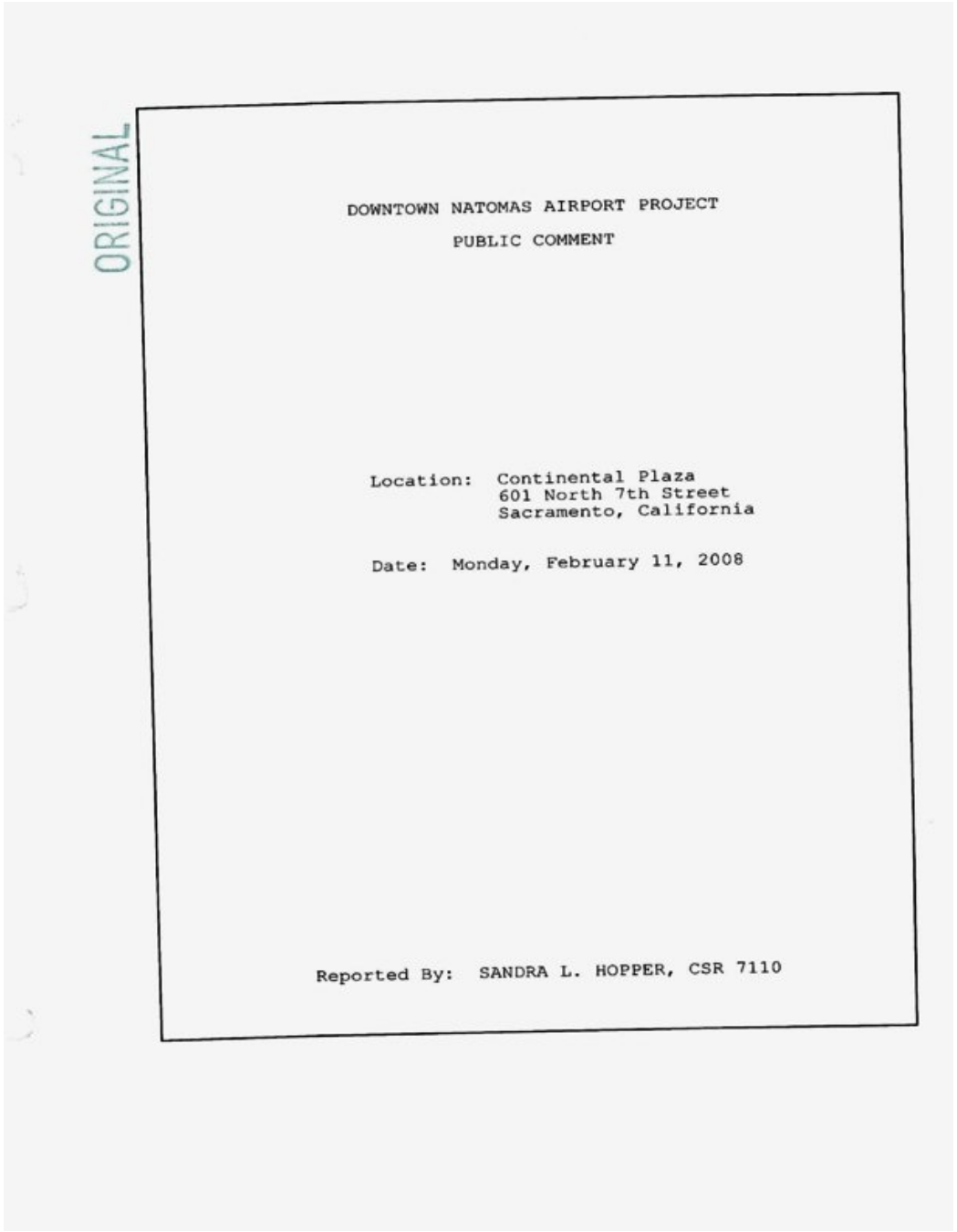

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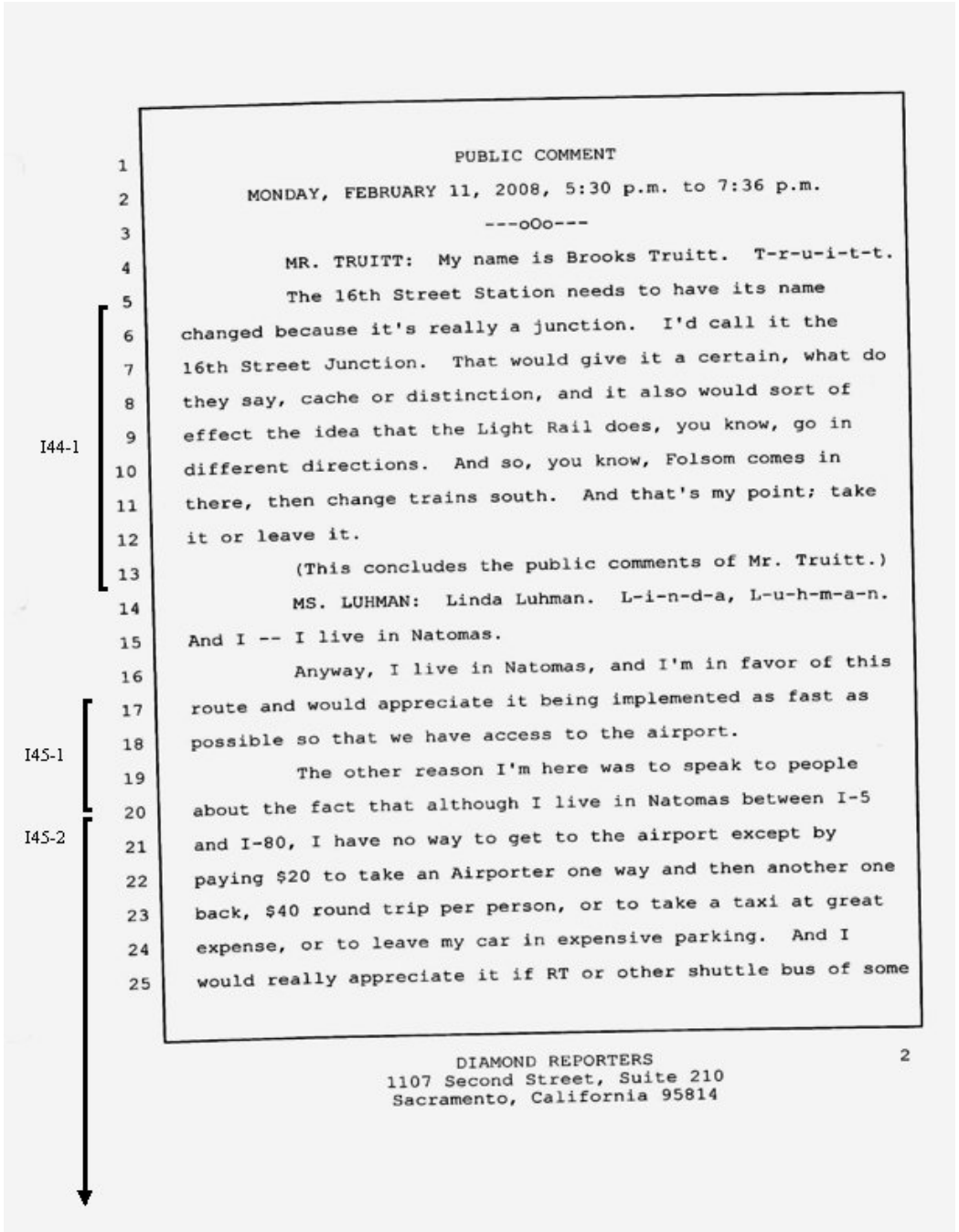
February 11, 2008



PUBLIC COMMENT

MONDAY, FEBRUARY 11, 2008, 5:30 p.m. to 7:36 p.m.

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MR. TRUITT: My name is Brooks Truitt. T-r-u-i-t-t. The 16th Street Station needs to have its name changed because it's really a junction. I'd call it the 16th Street Junction. That would give it a certain, what do they say, cache or distinction, and it also would sort of effect the idea that the Light Rail does, you know, go in different directions. And so, you know, Folsom comes in there, then change trains south. And that's my point; take it or leave it.

(This concludes the public comments of Mr. Truitt.)

MS. LUHMAN: Linda Luhman. L-i-n-d-a, L-u-h-m-a-n. And I -- I live in Natomas.

Anyway, I live in Natomas, and I'm in favor of this route and would appreciate it being implemented as fast as possible so that we have access to the airport.

The other reason I'm here was to speak to people about the fact that although I live in Natomas between I-5 and I-80, I have no way to get to the airport except by paying $20 to take an Airporter one way and then another one back, $40 round trip per person, or to take a taxi at great expense, or to leave my car in expensive parking. And I would really appreciate it if RT or other shuttle bus of some

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I44-1

I45-1

I45-2

Response to Comment I44-1

Consultation with the RT Engineering Department finds that it may not be appropriate to call the station a “junction”. The term "junction" in rail parlance refers to the place where the tracks meet (i.e. the switches), much in the way freeways meet ("Junction I-5 1 mile ahead"). It does not refer to the station itself. Other rail transit systems use the term "transfer station" for the place at which passengers can transfer from one line to another. See for example both "MacArthur BART Station" and "Grand Central Station" are called transfer stations. RT follows that convention. However, we could better highlight the transfer station term in our signage and graphics, both at the station and in printed materials.

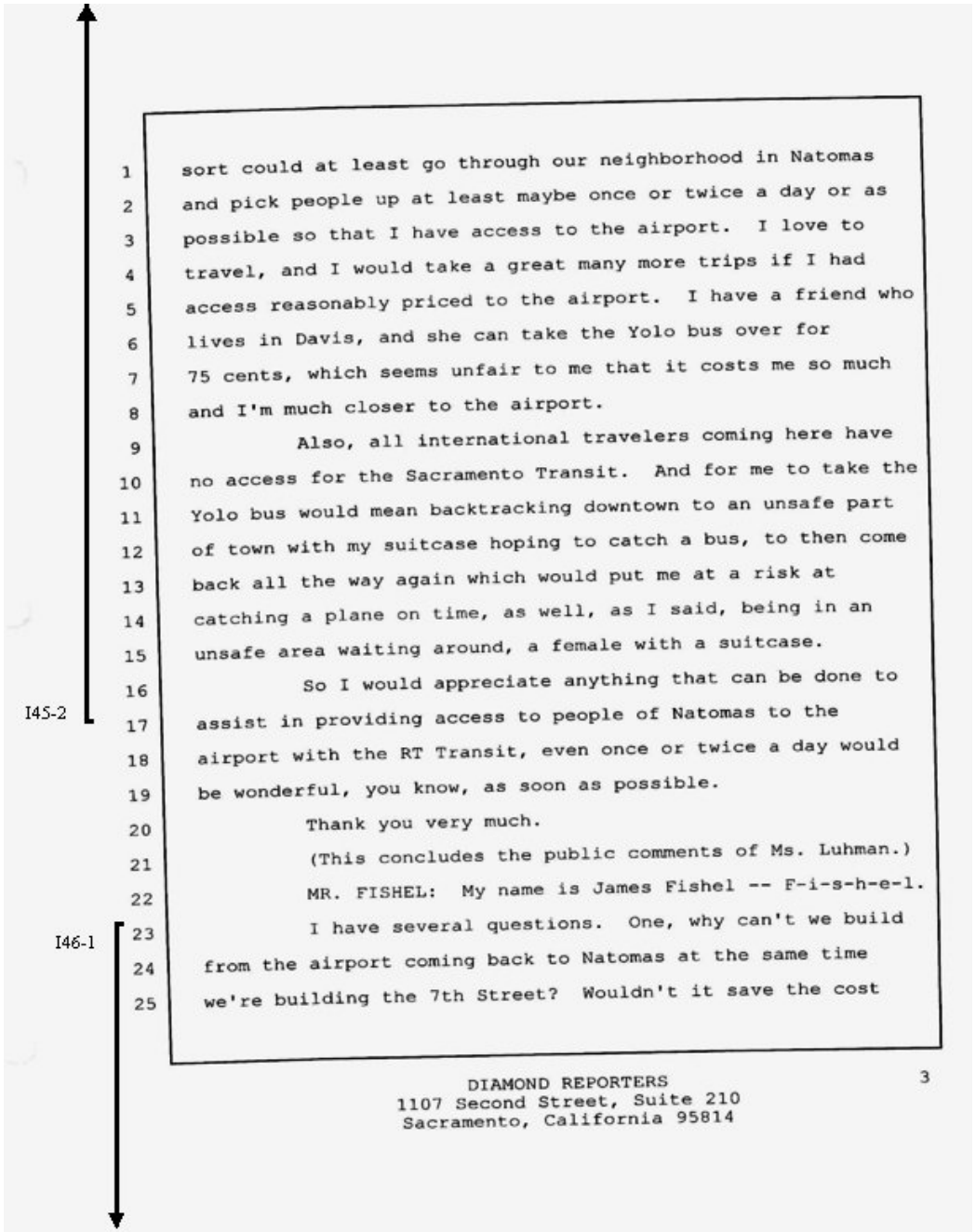
Response to Comment I45-1

Thank you for your comment. RT appreciates your support for the project.

Response to Comment I45-2

Regional Transit is aware of the need to provide more transit service for the North Natomas area in general and from Natomas to the airport. However, funding constraints caused by a reduction of federal and state funds resulted in a reduction in bus service in 2008. The Transit Master Plan update work program that is underway will seek ways to improve service throughout the region. One task requires the consultant team to review overall service to see if efficiencies can be found that can be used o provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions. The

Transit Master Plan update will examine transit development scenarios that will include expanded service, including bus, BRT, streetcar, light rail and other options. Implementation of the DNA project would provide Natomas residents with a convenient, inexpensive, and reliable mode of transportation to the airport.



sort could at least go through our neighborhood in Natomas and pick people up at least maybe once or twice a day or as possible so that I have access to the airport. I love to travel, and I would take a great many more trips if I had access reasonably priced to the airport. I have a friend who lives in Davis, and she can take the Yolo bus over for 75 cents, which seems unfair to me that it costs me so much and I'm much closer to the airport.

Also, all international travelers coming here have no access for the Sacramento Transit. And for me to take the Yolo bus would mean backtracking downtown to an unsafe part of town with my suitcase hoping to catch a bus, to then come back all the way again which would put me at a risk at catching a plane on time, as well, as I said, being in an unsafe area waiting around, a female with a suitcase.

So I would appreciate anything that can be done to assist in providing access to people of Natomas to the airport with the RT Transit, even once or twice a day would be wonderful, you know, as soon as possible.

Thank you very much.

(This concludes the public comments of Ms. Luhman.)

MR. FISHEL: My name is James Fishel -- F-i-s-h-e-l. I have several questions. One, why can't we build from the airport coming back to Natomas at the same time we're building the 7th Street? Wouldn't it save the cost

I45-2

I46-1

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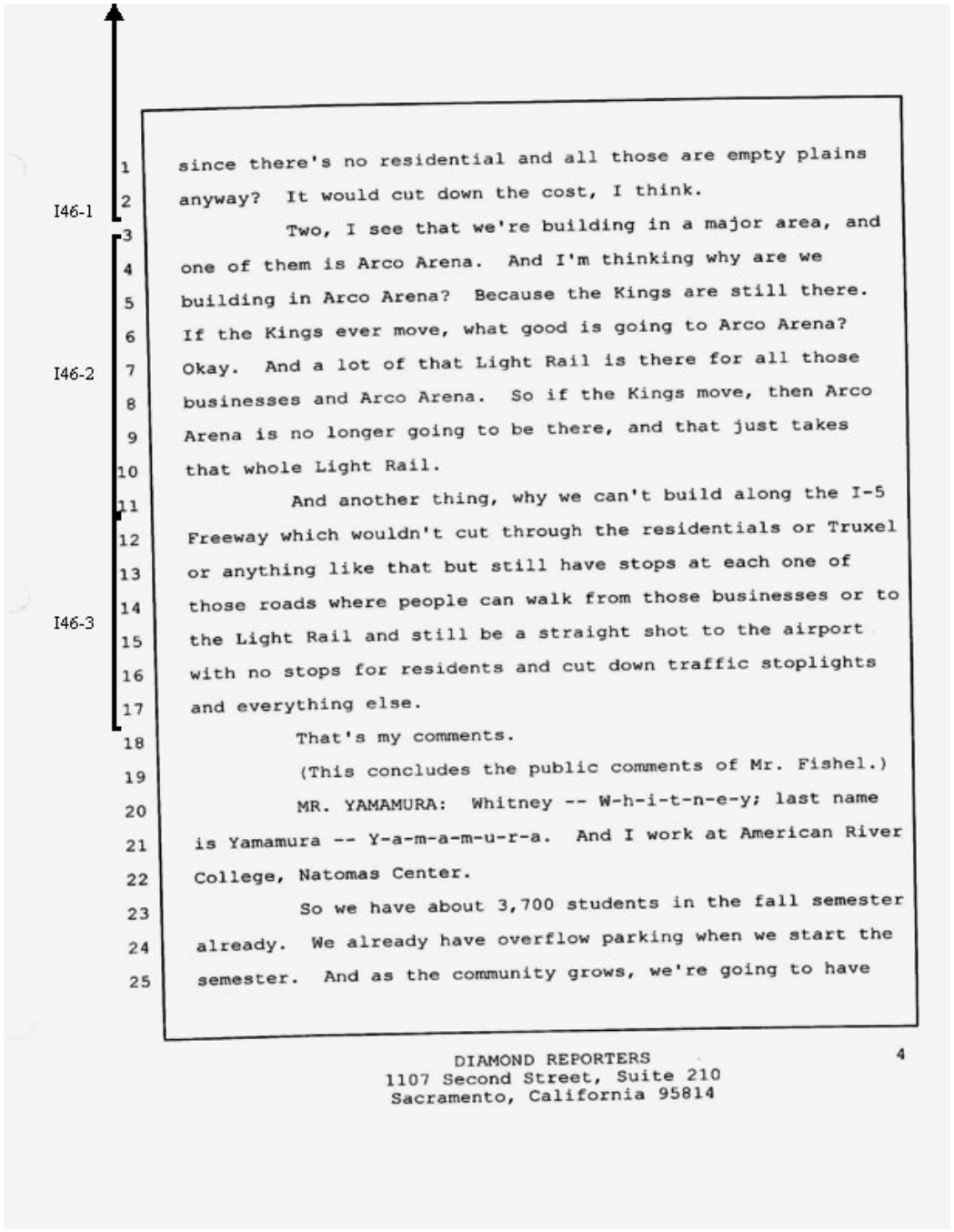
Response to Comment I46-1

Financial constraints preclude RT from building light rail north of Richards until additional local funding is identified. RT also hopes to secure Federal funding for subsequent phases. The Federal funding process is complicated and will require additional time to complete.



since there's no residential and all those are empty plains anyway? It would cut down the cost, I think.

I46-1

Two, I see that we're building in a major area, and one of them is Arco Arena. And I'm thinking why are we building in Arco Arena? Because the Kings are still there. If the Kings ever move, what good is going to Arco Arena? Okay. And a lot of that Light Rail is there for all those businesses and Arco Arena. So if the Kings move, then Arco Arena is no longer going to be there, and that just takes that whole Light Rail.

I46-2

And another thing, why we can't build along the I-5 Freeway which wouldn't cut through the residentials or Truxel or anything like that but still have stops at each one of those roads where people can walk from those businesses or to the Light Rail and still be a straight shot to the airport with no stops for residents and cut down traffic stoplights and everything else.

I46-3

That's my comments.

(This concludes the public comments of Mr. Fishel.)

MR. YAMAMURA: Whitney -- W-h-i-t-n-e-y; last name is Yamamura -- Y-a-m-a-m-u-r-a. And I work at American River College, Natomas Center.

So we have about 3,700 students in the fall semester already. We already have overflow parking when we start the semester. And as the community grows, we're going to have

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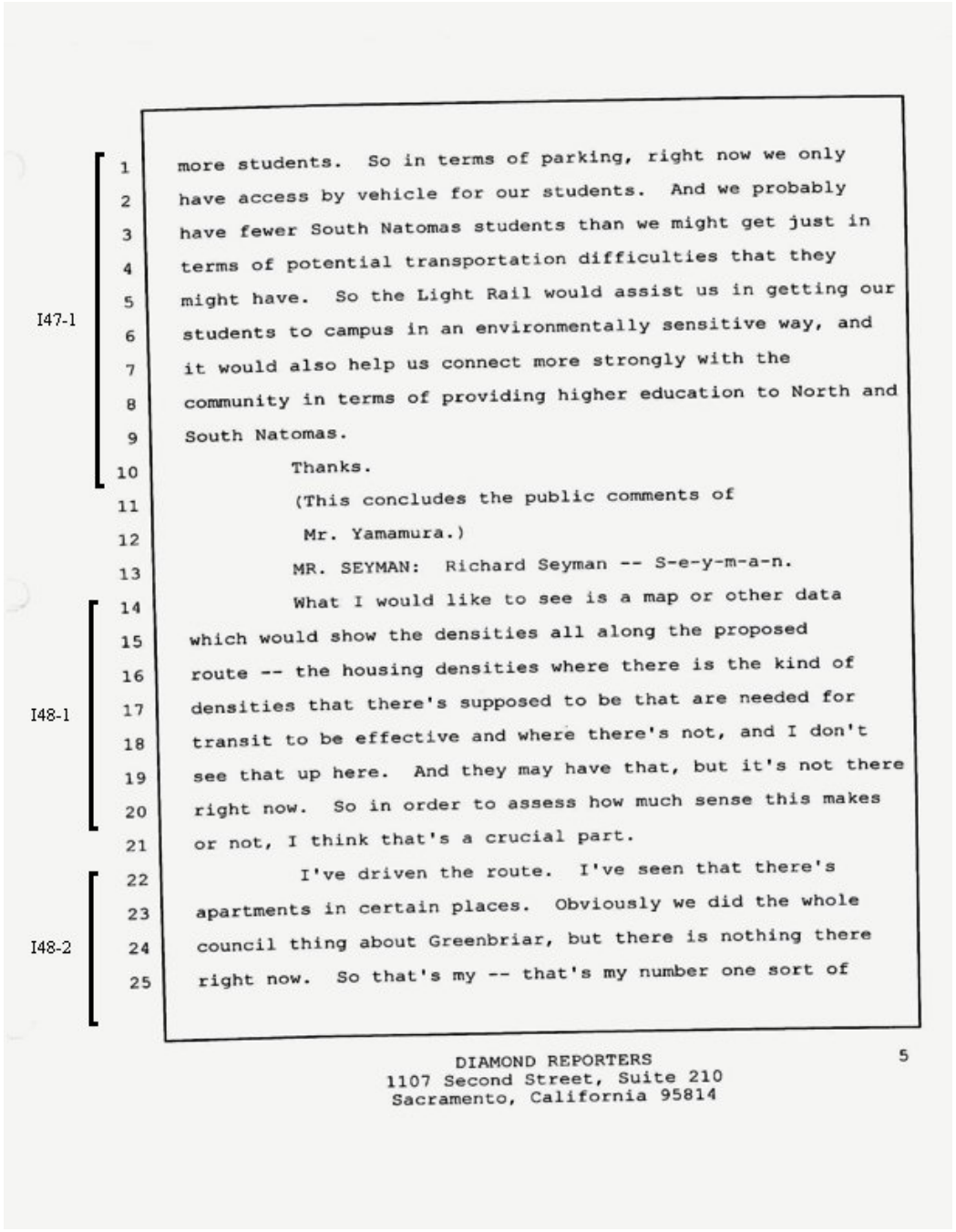
Response to Comment I46-2

At this time, there are no definite plans for the Sacramento Kings to move from their current location at ARCO Arena. The residential and commercial/office development in the area around ARCO Arena and in North Natomas is not dependent upon the Sacramento Kings remaining at ARCO Arena. Furthermore, the exact alignment of this phase of the DNA project will be determined during future project-level design, engineering, and environmental review, which will provide an opportunity to adjust the alignment at ARCO Arena, if necessary.

Response to Comment I46-3

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.



more students. So in terms of parking, right now we only have access by vehicle for our students. And we probably have fewer South Natomas students than we might get just in terms of potential transportation difficulties that they might have. So the Light Rail would assist us in getting our students to campus in an environmentally sensitive way, and it would also help us connect more strongly with the community in terms of providing higher education to North and South Natomas.

Thanks.

(This concludes the public comments of Mr. Yamamura.)

MR. SEYMAN: Richard Seyman -- S-e-y-m-a-n.

What I would like to see is a map or other data which would show the densities all along the proposed route -- the housing densities where there is the kind of densities that there's supposed to be that are needed for transit to be effective and where there's not, and I don't see that up here. And they may have that, but it's not there right now. So in order to assess how much sense this makes or not, I think that's a crucial part.

I've driven the route. I've seen that there's apartments in certain places. Obviously we did the whole council thing about Greenbriar, but there is nothing there right now. So that's my -- that's my number one sort of

I47-1

I48-1

I48-2

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Response to Comment I47-1

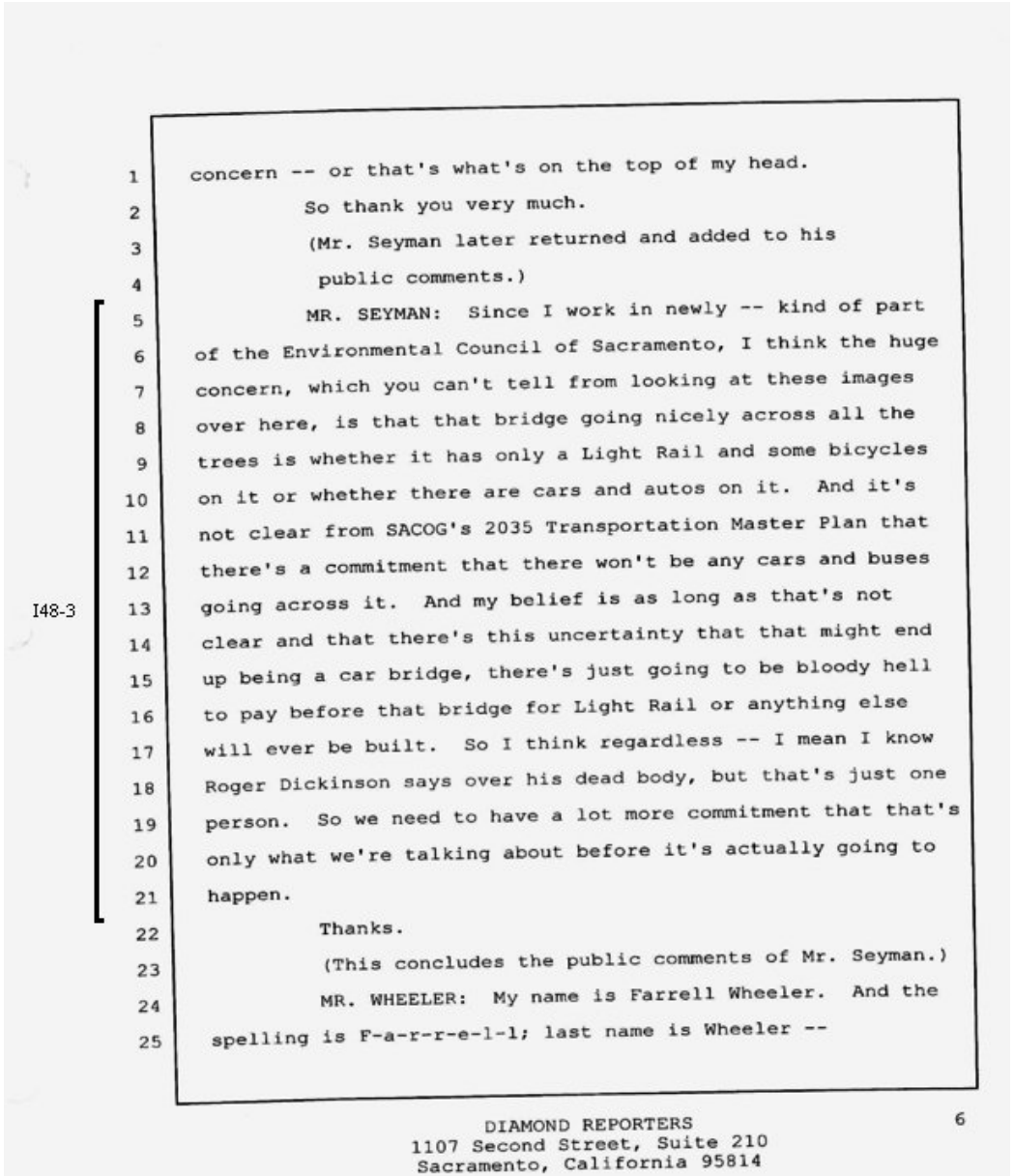
Thank you for your comment. RT appreciates your support for the project.

Response to Comment I48-1

Section 3.3, Methodology, beginning on page 3-16 of the Draft PEIR, describes the methodology used to generate the data to evaluate the DNA project, including ridership. The available database for population, households, employment, and other social/economic information are defined at a traffic analysis zone (TAZ) level based on SACOG's 2006 MTP projections. Housing densities are not defined nor used as an input to the SACMET travel forecast model; rather, the SACMET model uses a cross-classification scheme relating persons, workers, income, and auto ownership for determining travel behavior. Because the geographic area represented by each TAZ may include open space such as parks, golf courses and undeveloped areas; a map reflecting housing densities could misrepresent the land use data in the travel mode. As such, no geographic density graphics were created for the DNA modeling efforts.

Response to Comment I48-2

The analysis in the DNA project PEIR is based on the 2006 MTP, which did not include development in Greenbriar area. Furthermore, because a station is not proposed in the Greenbriar area in the PEIR, for the purposes of the PEIR, the DNA project is independent of the Greenbriar project.



concern -- or that's what's on the top of my head.
So thank you very much.
(Mr. Seyman later returned and added to his public comments.)
MR. SEYMAN: Since I work in newly -- kind of part of the Environmental Council of Sacramento, I think the huge concern, which you can't tell from looking at these images over here, is that that bridge going nicely across all the trees is whether it has only a Light Rail and some bicycles on it or whether there are cars and autos on it. And it's not clear from SACOG's 2035 Transportation Master Plan that there's a commitment that there won't be any cars and buses going across it. And my belief is as long as that's not clear and that there's this uncertainty that that might end up being a car bridge, there's just going to be bloody hell to pay before that bridge for Light Rail or anything else will ever be built. So I think regardless -- I mean I know Roger Dickinson says over his dead body, but that's just one person. So we need to have a lot more commitment that that's only what we're talking about before it's actually going to happen.
Thanks.
(This concludes the public comments of Mr. Seyman.)
MR. WHEELER: My name is Farrell Wheeler. And the spelling is F-a-r-r-e-l-l; last name is Wheeler --

I48-3

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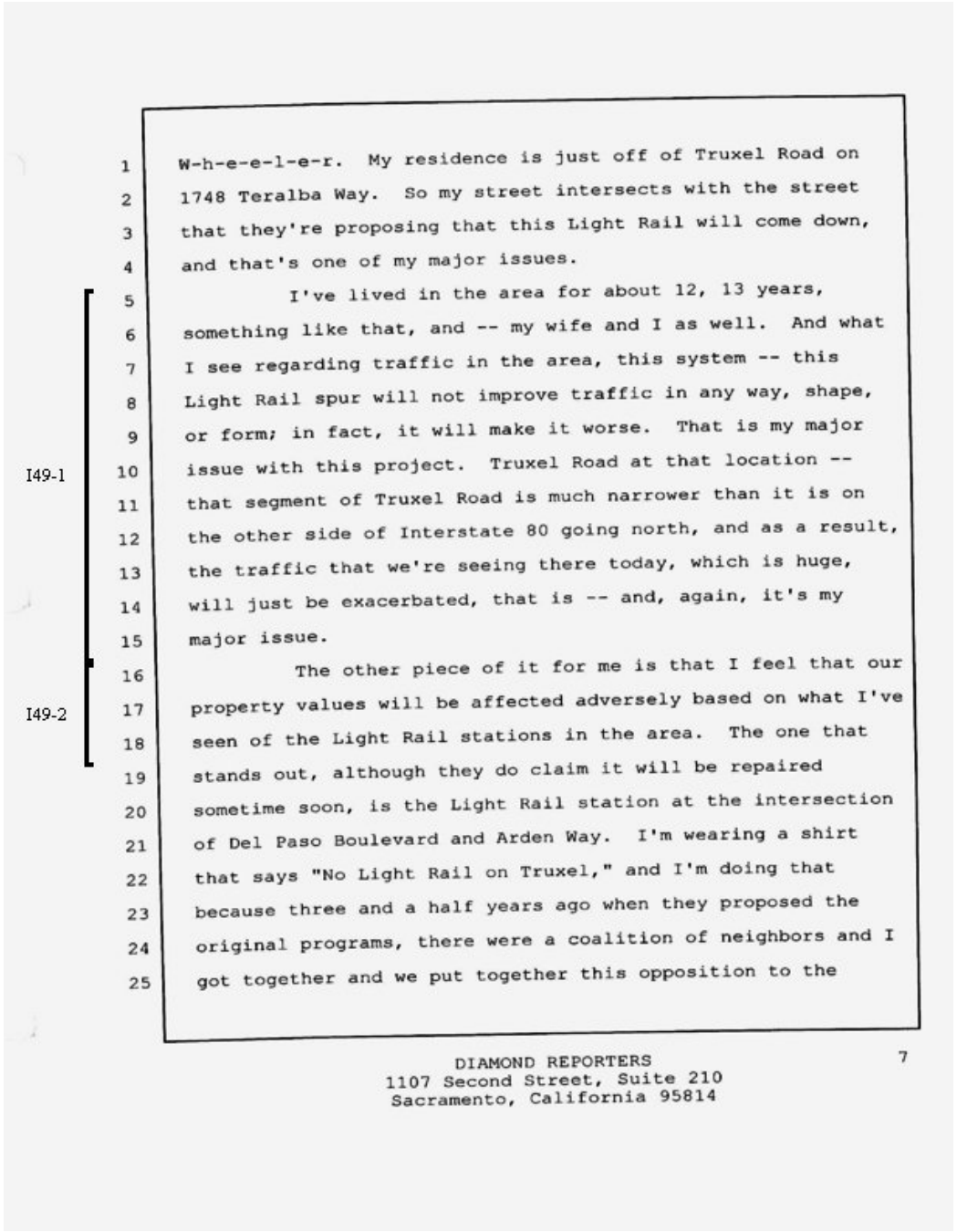
Response to Comment I48-3

The Locally Preferred Alternative for the DNA alignment, adopted by the Regional Transit Board in December 2003, only includes a transit bridge and facilities for pedestrians and bicycles. Any further consideration for an automobile bridge would need to be included in other future environmental analysis.



W-h-e-e-l-e-r. My residence is just off of Truxel Road on 1748 Teralba Way. So my street intersects with the street that they're proposing that this Light Rail will come down, and that's one of my major issues.

I've lived in the area for about 12, 13 years, something like that, and -- my wife and I as well. And what I see regarding traffic in the area, this system -- this Light Rail spur will not improve traffic in any way, shape, or form; in fact, it will make it worse. That is my major issue with this project. Truxel Road at that location -- that segment of Truxel Road is much narrower than it is on the other side of Interstate 80 going north, and as a result, the traffic that we're seeing there today, which is huge, will just be exacerbated, that is -- and, again, it's my major issue.

The other piece of it for me is that I feel that our property values will be affected adversely based on what I've seen of the Light Rail stations in the area. The one that stands out, although they do claim it will be repaired sometime soon, is the Light Rail station at the intersection of Del Paso Boulevard and Arden Way. I'm wearing a shirt that says "No Light Rail on Truxel," and I'm doing that because three and a half years ago when they proposed the original programs, there were a coalition of neighbors and I got together and we put together this opposition to the

I49-1

I49-2

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Response to Comment I49-1

Comment noted. Some intersections in the study area would experience decreased delay times with the project, while other intersection would experience increased delay times. The transportation analysis on page 3-54 of the Draft PEIR acknowledges intersections that would have significant traffic impacts requiring mitigation.

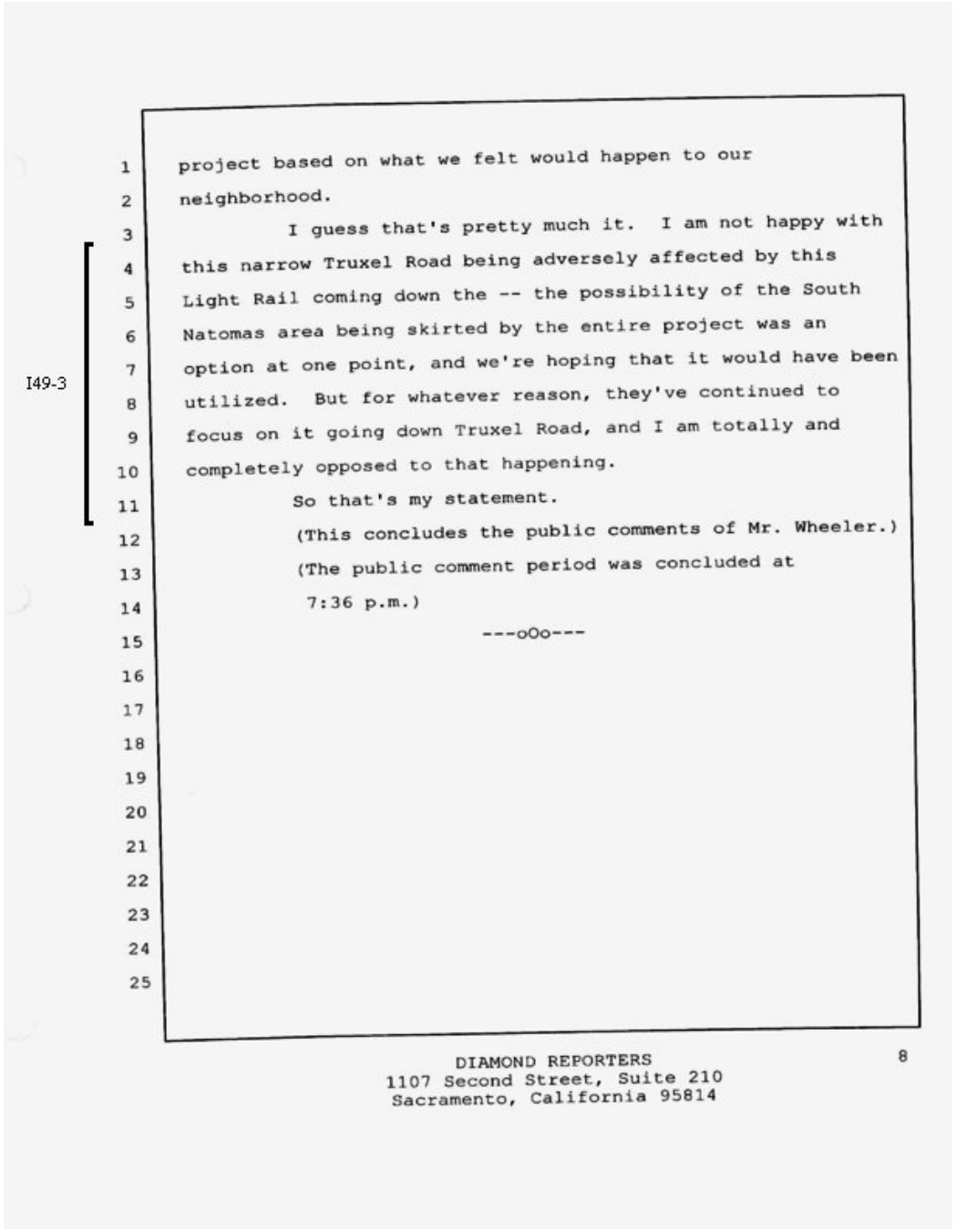
While no specific design option for light rail operations on Truxel Road have been selected, a potential range of options, including mixed flow, were included for evaluation at the program-level. Future project-level design and engineering will provide an opportunity to further evaluate and refine track alignments along Truxel Road.

Response to Comment I49-2

With regard to property values, the factor that has the most direct effect on this is proximity to light rail. Work undertaken by David Boyce and Arthur Nelson, or Professors Robert Cervero and John Landis, as reported at the Transportation Research Board in 1995 or as published in the "Urban Land" magazine in 2002, indicates that residential property values increase by over 25 percent with proximity to light rail transit when compared with residences further away from transit. This is a significant and proven economic development effect of light rail that was borne out in RT's own study of property values near transit. This study was performed by Booz-Allen Hamilton.

In addition, the conditions of the Arden-Del Paso area are not due to the light rail, but rather to prior non-

investment in the area. Since the inception of the light rail, the City has undertaken significant investment in the streets to make it easier for the residents there to take advantage of the light rail service and more investment is following. Without light rail the street improvements may well have been made elsewhere.



project based on what we felt would happen to our neighborhood.

I guess that's pretty much it. I am not happy with this narrow Truxel Road being adversely affected by this Light Rail coming down the -- the possibility of the South Natomas area being skirted by the entire project was an option at one point, and we're hoping that it would have been utilized. But for whatever reason, they've continued to focus on it going down Truxel Road, and I am totally and completely opposed to that happening.

So that's my statement.

(This concludes the public comments of Mr. Wheeler.)

(The public comment period was concluded at 7:36 p.m.)

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I49-3

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Response to Comment I49-3

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) SS.
COUNTY OF SACRAMENTO)

I, SANDRA L. HOPPER, a certified shorthand reporter, do hereby certify that the foregoing 8 pages comprise a full, true and correct transcription of the public comments taken in the hereinbefore-entitled matter.

Dated this 13th day of February, 2008, at Sacramento, California.

SANDRA L. HOPPER, CSR NO. 7110

SACRAMENTO REGIONAL TRANSIT DISTRICT

BOARD MEETING

DRAFT EIR FOR DNA PROJECT

1400 29th Street

Sacramento, CA 95814

Monday, February 25, 2008

6:00 P.M.

LC4-1

Reported by: JILL R. MCLEOD, CSR #10071
DIAMOND COURT REPORTERS
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RT Board Meeting
February 25, 2008

LC4-1

MS. BROOKS: Public Hearing Item Number 15. Draft programmatic environmental impact report for the Downtown-Natomas-Airport project presented by Rose Mary Covington.

MS. MACGLASHAN: I might add, while this is setting up, I have seven requests to speak on this item. If anyone else wishes to speak on this item, who isn't signed up, I encourage you to fill out the form now and turn it into the clerk, please.

MS. COVINGTON: Okay. Thank you, Madam Chairwoman, Members of the Board. You recall that on December the 28th, we released the draft Environmental Impact Report to the general public to begin garnering comments.

We approached you on January 14th and we then proceeded to have meetings with the Technical Advisory Committee and the Citizens Advisory Committee. Both of those meetings were very successful, although not as well attended as we would have liked.

We went from there to having two open houses. One at the high school in Natomas and the other at Continental Plaza, along the route of MOS-1.

Both of those meetings were very well attended. We had about 110 people at the meeting and we had an open format, which allowed them to give us their comments while they were talking to some of the people who actually worked on the

document, where they were able to answer their questions.

We took comments through a court reporter and in writing at the public meetings and those comments will become part of the public record for the process.

We also received a lot of media coverage as a result of those meetings. I think we were covered by all of the television stations and we got coverage in the newspaper.

Tonight we are having a formal public hearing on the project. The formal comments close on February 26th, which gives us over two months of comments, more than is required by the public hearing regulations.

After the public hearing is over and all the comments are received tomorrow, we will be spending time responding to the comments and beginning to give those comments back to you for your approval of the draft Environmental Impact Report, which we expect to bring to you at your April 21st meeting, I'm sorry, April 28th meeting.

A couple things you should know is that we have done this in compliance with CEQA, and we will be giving you comments so you can give your formal review and approval of the EIR and the EIR reflects the independent judgment of this project.

In going to the next slide, it reaffirms your choice for the preferred alternative, and it, in the formal process, completes the first tier of the environmental review. You

will recall that we will do the final Environmental Impact Report on MOS-1, when we go through the transitional analysis, which we also expect to begin in April.

That is all I have to say to get us started and I think now we are ready to accept comments. Thank you.

MS. MACGLASHAN: Before we take public comments, are there any questions by Board members? We did have an overview of the draft EIR at our last meeting. Any comments of staff at this time? Then I will start with the public comments. The first person signed up to speak is Leoma Lee, followed by Walt Seifert. Leoma Lee?

MS. LEE: Just trying to get a little closer, so you guys can see me and I can see you. I have a few questions regarding the trip from Downtown out to the airport.

Are there going to be more buses going to be cut in order to pay for the price of the rail going out there for the RT, for the Light Rail station? I37-1

MS. MACGLASHAN: Just go ahead and ask your questions.

MS. LEE: Then do we have an approximate date that the system would be up and running going out to the airport and out to Arco Arena? And are the cutoffs already covered or will it affect drivers or bus lines or the RT continuance as far as getting the south side set up as well as the trip out to the airport? I37-2

And my last question is, if they are not going to cut I37-3

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Response to Comment I37-1

Regarding the comment about cuts to bus service, RT is looking at several phases to build the DNA project all the way to the airport. The first phase is called MOS-1. It will be developed and under construction and operational by 2010. That service would not involve any bus cuts to build and operate. Beyond the MOS-1, to cross the river and build as far as we can to the airport, will in fact require additional local support and local funding to accomplish that. It's our expectation that we will pursue capital dollars, the cost of building from the federal government, following the federal regulations to qualify for federal funding to construct it. One of the requirements to qualify for federal funding is that the overall level of bus service cannot be reduced to pay the operating costs. As a result of this requirement, RT would not be looking at any reduction in bus service because it is prohibited under federal regulations.

Response to Comment I37-2

RT is planning to have the MOS-1 operational in 2010. Beyond the timeline for MOS-1, it is conceivable that operation, possibly as far as to the airport, could begin as early as 2017.

Regarding the costs covered, please refer to response to Comment 58-1. Because the costs beyond MOS-1 are not covered, In order to get beyond the MOS-1, or from Richards, it will require an additional level of local support. RT has sufficient funding and capital dollars to extend MOS-1, and has incorporated the expected operating costs, which are very minor, for MOS-1 into future financial projections. Beyond MOS-1, the majority of the DNA project cost, is currently not covered and will

in fact require additional local support to accomplish that. Additional funding could potentially come from a sales tax or some other local support or other local source; as well as, from state and federal funding.

Response to Comment I37-3

In the Alternatives Analysis phase, RT considered potential changes to bus service and bus stop locations in Natomas and the entire the DNA corridor. Bus and LRT service will complement each other, offering an integrated system.

I37-3

lines, will more lines be put out there in order to make the connections for those trips?

MS. MACGLASHAN: Does that conclude your questions?

MS. LEE: Those are my questions.

MS. MACGLASHAN: Okay. Normally we don't respond to EIR comments in the hearing itself, but I think your questions seem to be not related so much to the environmental document as to the operations, and I think those are questions that maybe Mr. Wiley might be prepared to answer.

MR. WILEY: Regarding the first question, having to do with bus cuts, ultimately -- well, we are looking at several phases to build a Light Rail line all the way to the airport. The first phase we call MOS-1. It will be developed and under construction and operational by 2010. That service would not involve any bus cuts to build and operate.

Beyond the MOS-1, to cross the river and build as far as we can to the airport will in fact require additional local support and local funding to accomplish that. It's our expectation that we will pursue capital dollars, the cost of building from the federal government, in pursuing under the federal regulations to qualify for federal funding to construct it.

One of the requirements that will have to be met in accomplishing that is actually you cannot reduce your overall level of bus service to pay the operating costs and still

qualify for federal funding to build an extension to the airport, so ultimately, no, we would not be looking at any reduction in bus service because in fact you're prohibited from doing that under federal regulations.

MS. LEE: Okay.

MR. WILEY: The dates regarding service. As I indicated, MOS-1, we are looking at an operational date in 2010.

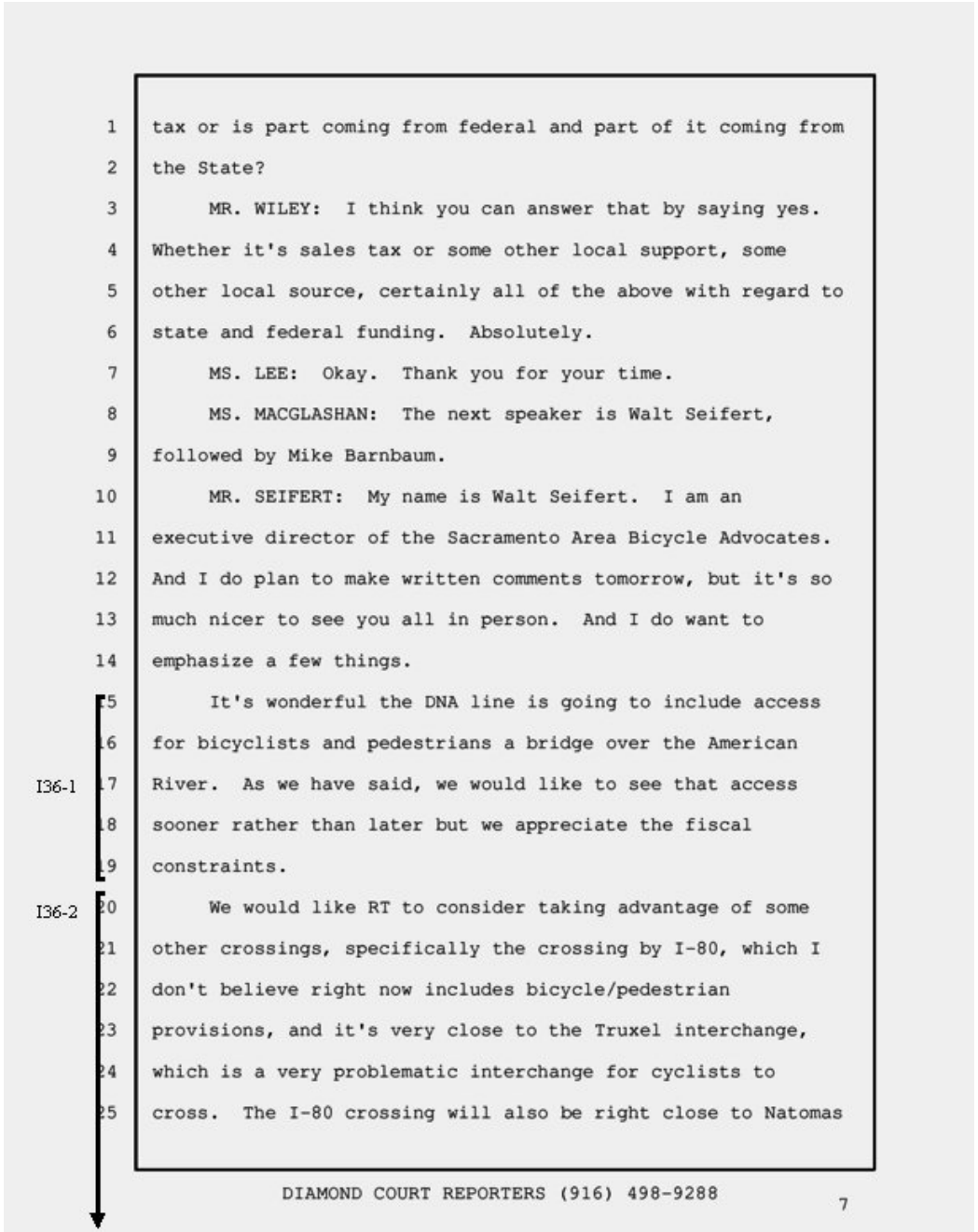
MS. LEE: Okay.

MR. WILEY: Beyond that strategy, that we have presented to the Board, would allow us to be operational, conceivably as far as to the airport, as early as 2017.

MS. LEE: Okay.

MR. WILEY: Regarding the costs covered, I already indicated that in order to get beyond the MOS-1, or from Richards, it will require an additional level of local support, so no, the costs beyond that are not covered. The costs to extend MOS-1, we have sufficient funding and capital dollars to build that and we have incorporated the expected operating costs, which is very, very minor for that minimal extension in our future financial projections, but beyond that, which is the lion share of the cost, is currently not covered and will in fact require additional local support to accomplish that.

MS. LEE: So we are talking sales tax or state income



tax or is part coming from federal and part of it coming from the State?

MR. WILEY: I think you can answer that by saying yes. Whether it's sales tax or some other local support, some other local source, certainly all of the above with regard to state and federal funding. Absolutely.

MS. LEE: Okay. Thank you for your time.

MS. MACGLASHAN: The next speaker is Walt Seifert, followed by Mike Barnbaum.

MR. SEIFERT: My name is Walt Seifert. I am an executive director of the Sacramento Area Bicycle Advocates. And I do plan to make written comments tomorrow, but it's so much nicer to see you all in person. And I do want to emphasize a few things.

It's wonderful the DNA line is going to include access for bicyclists and pedestrians a bridge over the American River. As we have said, we would like to see that access sooner rather than later but we appreciate the fiscal constraints.

We would like RT to consider taking advantage of some other crossings, specifically the crossing by I-80, which I don't believe right now includes bicycle/pedestrian provisions, and it's very close to the Truxel interchange, which is a very problematic interchange for cyclists to cross. The I-80 crossing will also be right close to Natomas

I36-1

I36-2

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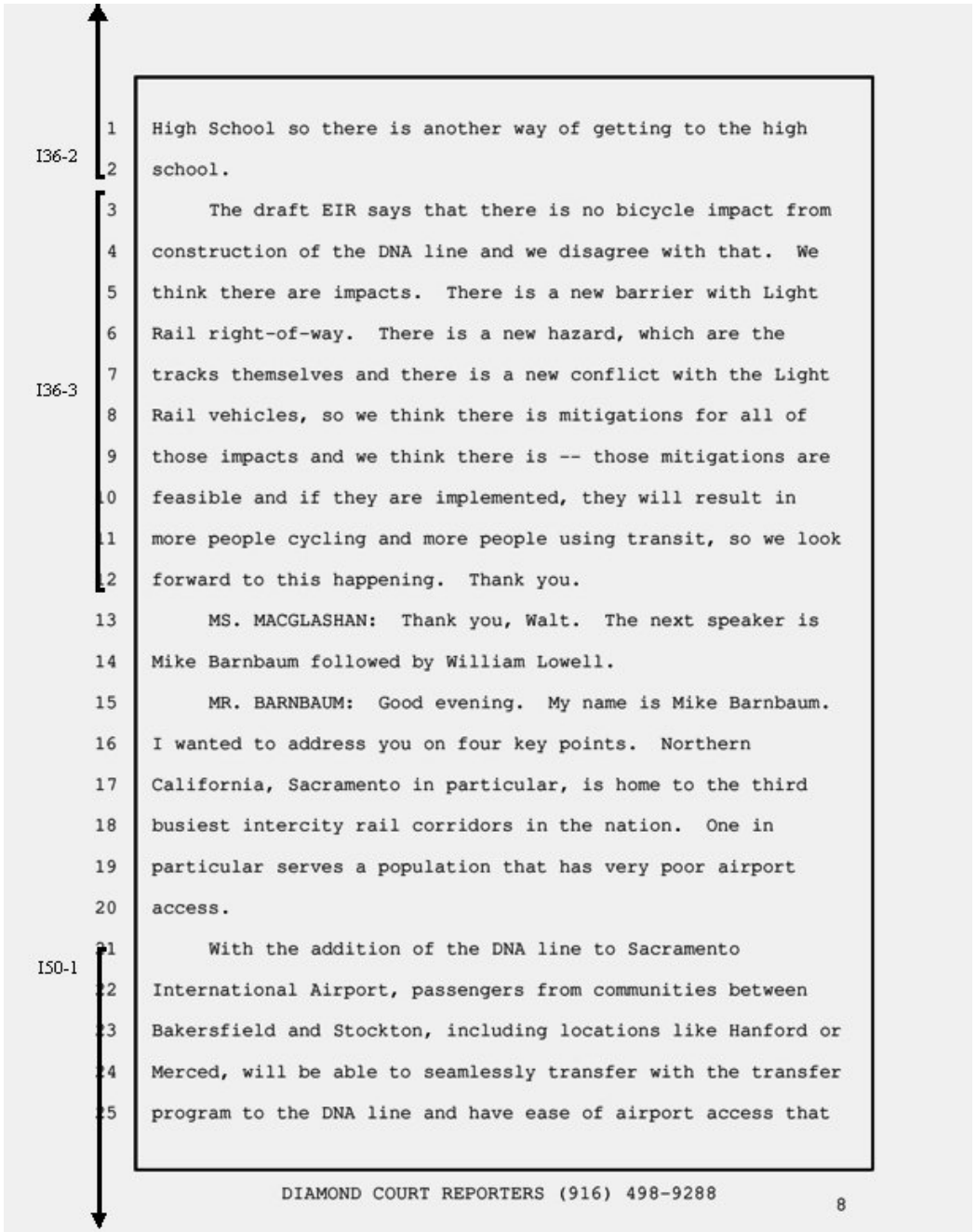
Response to Comment I36-1

Thank you for your comment. RT appreciates your support for the project.

Response to Comment I36-2

Please refer to response to SABA Comment I8-3.



I36-2

High School so there is another way of getting to the high school.

I36-3

The draft EIR says that there is no bicycle impact from construction of the DNA line and we disagree with that. We think there are impacts. There is a new barrier with Light Rail right-of-way. There is a new hazard, which are the tracks themselves and there is a new conflict with the Light Rail vehicles, so we think there is mitigations for all of those impacts and we think there is -- those mitigations are feasible and if they are implemented, they will result in more people cycling and more people using transit, so we look forward to this happening. Thank you.

MS. MACGLASHAN: Thank you, Walt. The next speaker is Mike Barnbaum followed by William Lowell.

MR. BARNBAUM: Good evening. My name is Mike Barnbaum. I wanted to address you on four key points. Northern California, Sacramento in particular, is home to the third busiest intercity rail corridors in the nation. One in particular serves a population that has very poor airport access.

I50-1

With the addition of the DNA line to Sacramento International Airport, passengers from communities between Bakersfield and Stockton, including locations like Hanford or Merced, will be able to seamlessly transfer with the transfer program to the DNA line and have ease of airport access that

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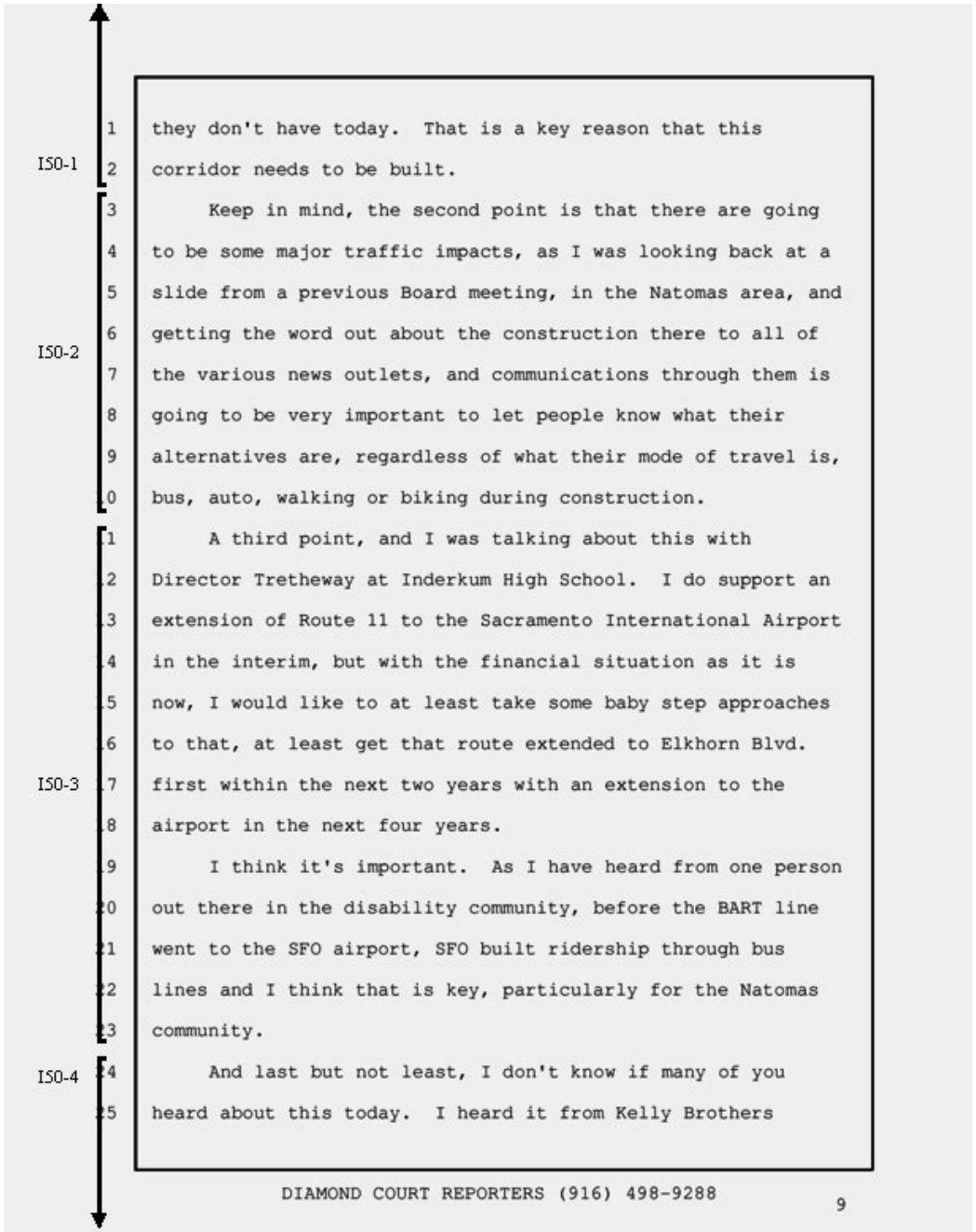
Response to Comment I36-3

Please refer to response to SABA Comment I8-8.

Response to Comment I50-1

Thank you for your comment. RT appreciates your support for the project.



they don't have today. That is a key reason that this corridor needs to be built.

Keep in mind, the second point is that there are going to be some major traffic impacts, as I was looking back at a slide from a previous Board meeting, in the Natomas area, and getting the word out about the construction there to all of the various news outlets, and communications through them is going to be very important to let people know what their alternatives are, regardless of what their mode of travel is, bus, auto, walking or biking during construction.

A third point, and I was talking about this with Director Tretheway at Inderkum High School. I do support an extension of Route 11 to the Sacramento International Airport in the interim, but with the financial situation as it is now, I would like to at least take some baby step approaches to that, at least get that route extended to Elkhorn Blvd. first within the next two years with an extension to the airport in the next four years.

I think it's important. As I have heard from one person out there in the disability community, before the BART line went to the SFO airport, SFO built ridership through bus lines and I think that is key, particularly for the Natomas community.

And last but not least, I don't know if many of you heard about this today. I heard it from Kelly Brothers

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I50-1 I50-2 I50-3 I50-4

Response to Comment I50-2

Comment noted. Some intersections in the study area would experience decreased delay times with the project, while other intersection would experience increased delay times. The transportation analysis on page 3-54 of the Draft PEIR acknowledges intersections that would have significant traffic impacts requiring mitigation.

Construction impacts would be mitigated by the use of best practices and, more importantly, avoidance of impacts to the extent possible through well-designed options. In addition, a Construction Mitigation Plan will be developed that would be a key measure for off-setting the construction impacts of the DNA project. As part of the Construction Mitigation Plan, a Communications Plan, including a public information element, will be developed and implemented by a public information manager with responsibility for maintaining communication with affected residents and the local government. The contractor will be responsible for staffing the public information personnel and ensuring implementation of all public involvement activities. Please refer to Section 4.20, Construction Impacts, of the Draft PEIR for a complete description of construction impacts of the DNA project.

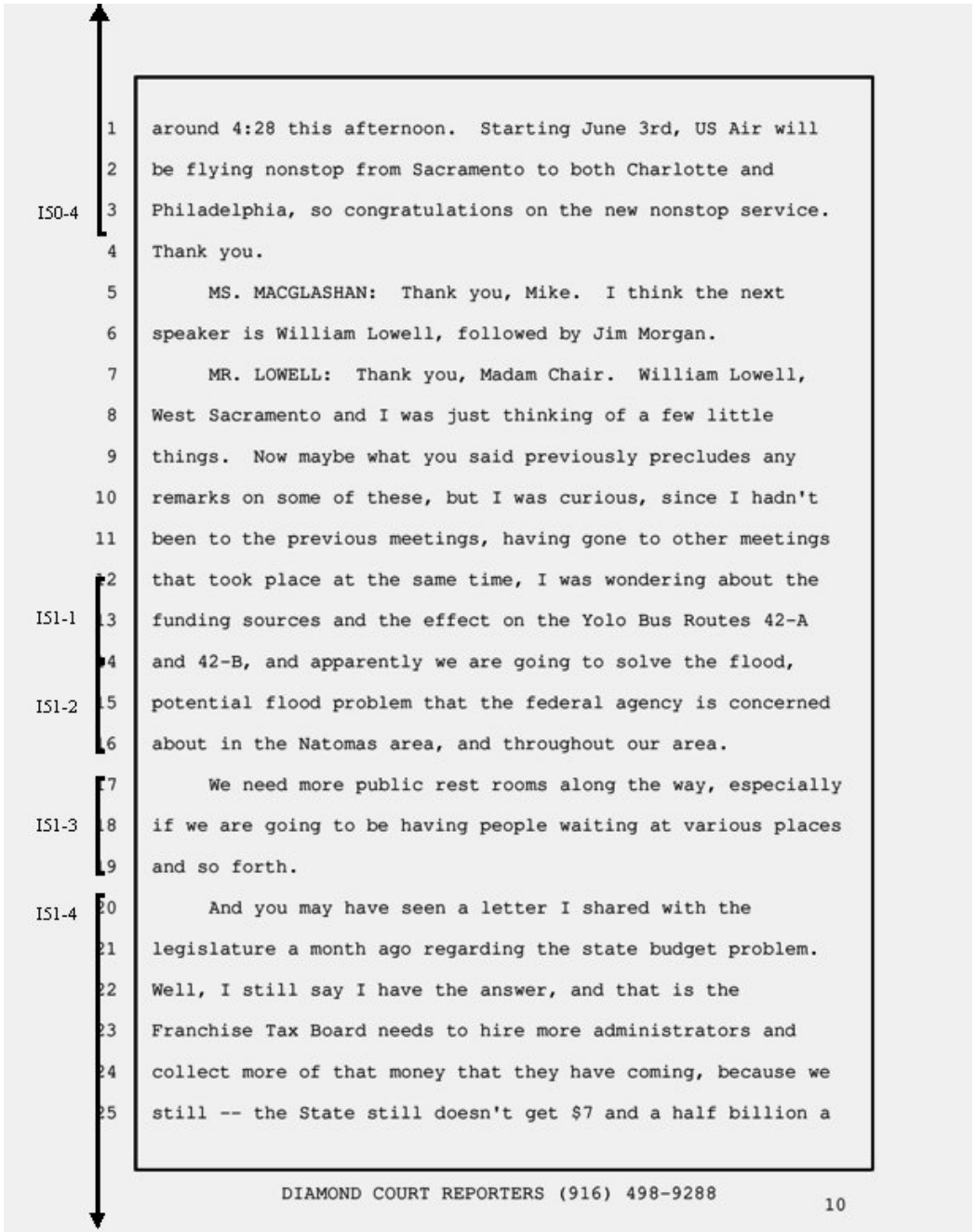
Response to Comment I50-3

Regional Transit is aware of the need to provide more transit service for the North Natomas area in general and from Natomas to the airport. However, funding constraints caused by a reduction of federal and state funds resulted in a reduction in bus service in 2008. The Transit Master Plan update work program that is

underway will seek ways to improve service throughout the region. One task requires the consultant team to review overall service to see if efficiencies can be found that can be used to provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions. The Transit Master Plan update will examine transit development scenarios that will include expanded service, including bus, BRT, streetcar, light rail and other options. Implementation of the DNA project would provide Natomas residents with a convenient, inexpensive, and reliable mode of transportation to the airport.

Response to Comment I50-4

Thank you for your comment.



around 4:28 this afternoon. Starting June 3rd, US Air will be flying nonstop from Sacramento to both Charlotte and Philadelphia, so congratulations on the new nonstop service. Thank you.

MS. MACGLASHAN: Thank you, Mike. I think the next speaker is William Lowell, followed by Jim Morgan.

MR. LOWELL: Thank you, Madam Chair. William Lowell, West Sacramento and I was just thinking of a few little things. Now maybe what you said previously precludes any remarks on some of these, but I was curious, since I hadn't been to the previous meetings, having gone to other meetings that took place at the same time, I was wondering about the funding sources and the effect on the Yolo Bus Routes 42-A and 42-B, and apparently we are going to solve the flood, potential flood problem that the federal agency is concerned about in the Natomas area, and throughout our area.

We need more public rest rooms along the way, especially if we are going to be having people waiting at various places and so forth.

And you may have seen a letter I shared with the legislature a month ago regarding the state budget problem. Well, I still say I have the answer, and that is the Franchise Tax Board needs to hire more administrators and collect more of that money that they have coming, because we still -- the State still doesn't get $7 and a half billion a

Response to Comment I51-1

RT is planning to build the DNA project in several phases all the way to the airport. The first phase is called MOS-1. It will be developed and under construction and operational by 2010. MOS-1 would not involve any bus cuts to build and operate. Beyond MOS-1, to cross the river and build as far as we can to the airport, will in fact require additional local support and local funding to accomplish that. It's our expectation that we will pursue capital dollars, the cost of building from the federal government, following the federal regulations to qualify for federal funding to construct it. One of the requirements to qualify for federal funding is that the overall level of bus service cannot be reduced to pay the operating costs. As a result of this requirement, RT would not be looking at any reduction in bus service because it is prohibited under federal regulations. Yolo County Transit District provides Yolobus service for West Sacramento, Davis, Woodland, and other communities in Yolo County. RT does not operate the Yolo Bus routes 42-A and 42-B.

Response to Comment I51-2

A discussion of the flood risk in Sacramento is provided on Pages 4.18-5 and 4.18-6 in Section 4.18, Water Resources, of the Draft PEIR. As stated in the Draft PEIR, the DNA project area in downtown Sacramento is designated by the Federal Emergency Management Agency (FEMA) as Zone X, an area protected from the base flood by the construction of a levee, dike, or other structural measure. Therefore, the area is not considered at risk for significant flood hazard as designated by FEMA.

In the Natomas Basin, the US Army Corps of Engineers (USACE) is moving forward with a Zone AR designation. As defined by FEMA, Zone AR designates a Special Flood Hazard Area formerly protected from the one percent annual chance of flood by a flood control system that was subsequently decertified and indicates that the former control system is being restored to provide protection from the one percent annual chance or greater flood. On September 27, 2007, FEMA denied an application from the City of Sacramento to designate the Natomas Basin Zone A-99, which denotes an area to be protected from one percent annual chance of flood by a Federal flood protection system under construction. The Sacramento Area Flood Control Agency is working with the City of Sacramento and the USACE to expedite work on the Natomas levee system. SAFCA has numerous projects under construction and in-planning in the Natomas area. The Draft PEIR acknowledges the USACE's recent decertification of the Natomas levee system on page 4.18-6:

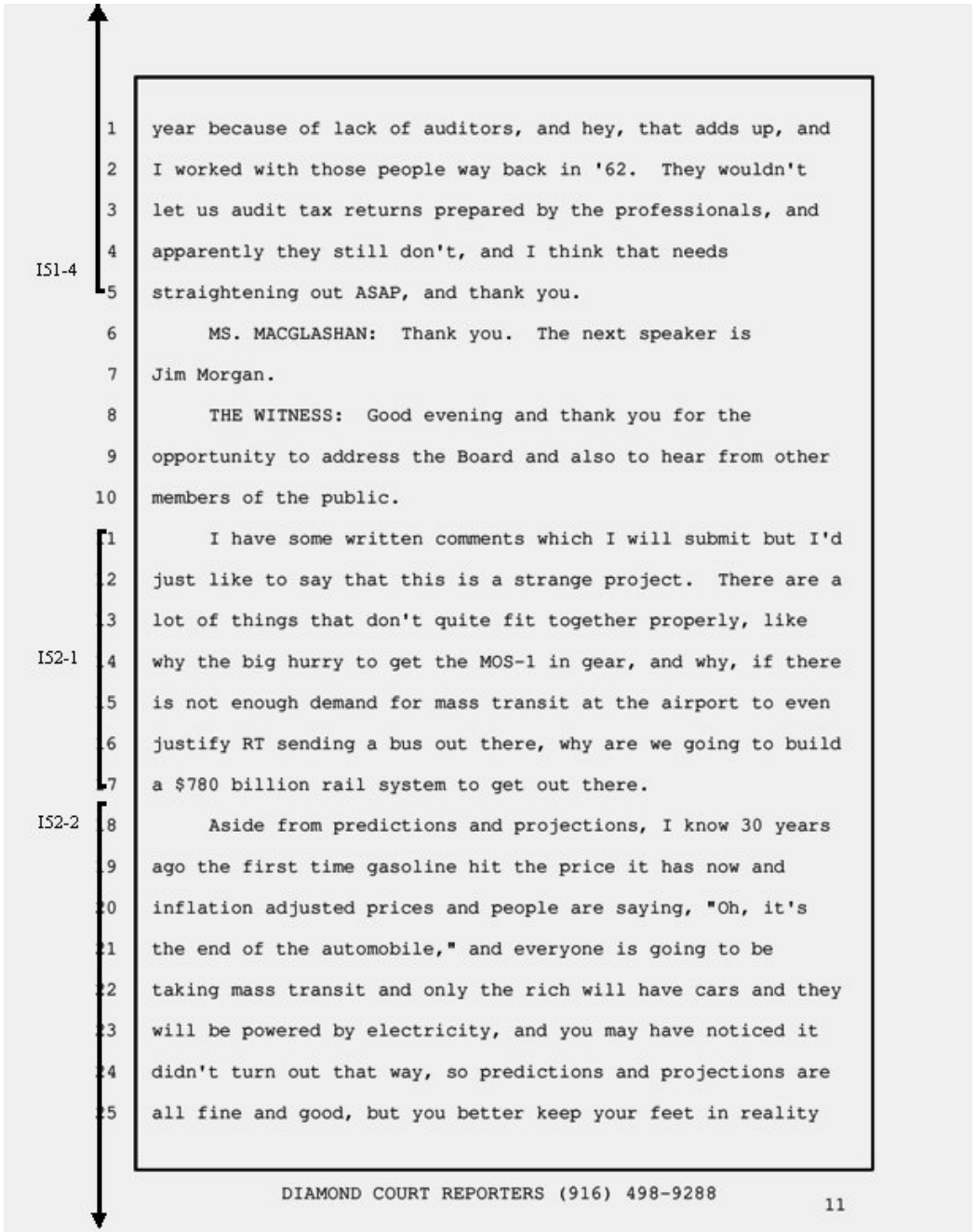
> "Recent local and federal studies; however, revealed that much more of the Natomas levee system is in need of repair, including erosion protection, seepage protection, and increased levee height. As a result of these studies, the USACE recently withdrew its endorsement of the Natomas levee system. SAFCA is prioritizing work efforts for areas and levees that are at higher risk to the 100-year flood event, but all levee improvement projects are being designed to the 200-year protection specifications."

Response to Comment I51-3

Comment noted. Transit stations typically have lighting, seating, landscaping, fare vending machines, security cameras, information kiosk, and bicycle parking. Seating areas are typically open. The amount of seating varies at each station. Some of the stations may have park and ride facilities. However, details regarding these facilities, including the potential inclusion of public restrooms, will be clarified in the next phase of study.

Response to Comment I51-4

Thank you for your comment. No response from RT is required because the comment is not relevant to the environmental analysis of the DNA project.



year because of lack of auditors, and hey, that adds up, and I worked with those people way back in '62. They wouldn't let us audit tax returns prepared by the professionals, and apparently they still don't, and I think that needs straightening out ASAP, and thank you.

MS. MACGLASHAN: Thank you. The next speaker is Jim Morgan.

THE WITNESS: Good evening and thank you for the opportunity to address the Board and also to hear from other members of the public.

I have some written comments which I will submit but I'd just like to say that this is a strange project. There are a lot of things that don't quite fit together properly, like why the big hurry to get the MOS-1 in gear, and why, if there is not enough demand for mass transit at the airport to even justify RT sending a bus out there, why are we going to build a $780 billion rail system to get out there.

Aside from predictions and projections, I know 30 years ago the first time gasoline hit the price it has now and inflation adjusted prices and people are saying, "Oh, it's the end of the automobile," and everyone is going to be taking mass transit and only the rich will have cars and they will be powered by electricity, and you may have noticed it didn't turn out that way, so predictions and projections are all fine and good, but you better keep your feet in reality

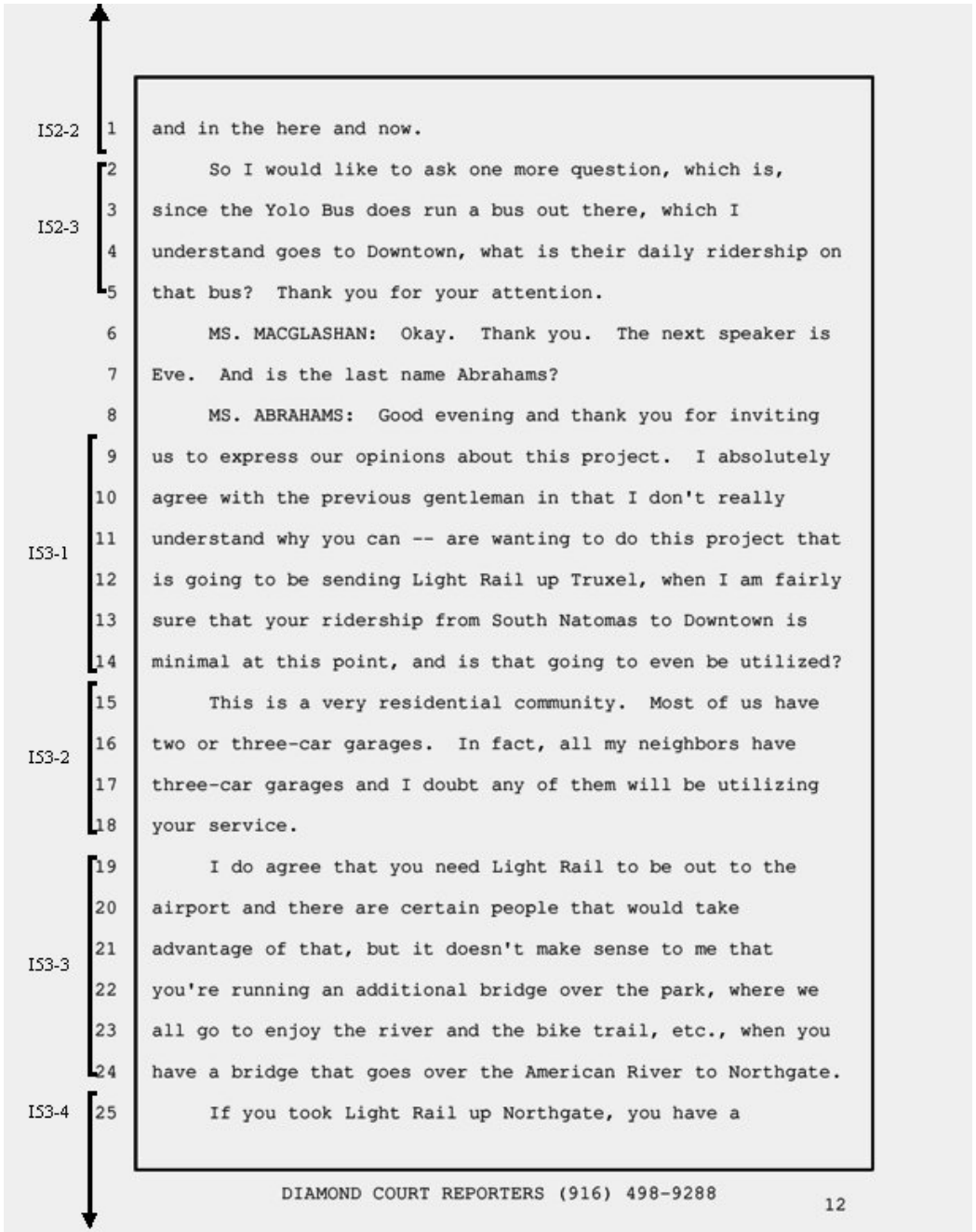
Response to Comment I52-1

Comment noted. RT has sufficient funding and capital dollars to extend MOS-1, and has incorporated the expected operating costs, which are very minor, for MOS-1 into future financial projections. RT is planning to have the MOS-1 operational in 2010. Beyond the timeline for MOS-1, it is conceivable that operation, possibly as far as to the airport, could begin as early as 2017.

Regional Transit is aware of the need to provide more transit service for the North Natomas area in general and from Natomas to the airport. However, funding constraints caused by a reduction of federal and state funds resulted in a reduction in bus service in 2008. The Transit Master Plan update work program that is underway will seek ways to improve service throughout the region. One task requires the consultant team to review overall service to see if efficiencies can be found that can be used to provide additional service for areas that are under served. Another task will seek new funding sources for short and long term solutions. The Transit Master Plan update will examine transit development scenarios that will include expanded service, including bus, BRT, streetcar, light rail and other options. Implementation of the DNA project would provide Natomas residents with a convenient, inexpensive, and reliable mode of transportation to the airport.

Response to Comment I52-2

Thank you for your comment.



I52-2

and in the here and now.

So I would like to ask one more question, which is, since the Yolo Bus does run a bus out there, which I understand goes to Downtown, what is their daily ridership on that bus? Thank you for your attention.

I52-3

MS. MACGLASHAN: Okay. Thank you. The next speaker is Eve. And is the last name Abrahams?

MS. ABRAHAMS: Good evening and thank you for inviting us to express our opinions about this project. I absolutely agree with the previous gentleman in that I don't really understand why you can -- are wanting to do this project that is going to be sending Light Rail up Truxel, when I am fairly sure that your ridership from South Natomas to Downtown is minimal at this point, and is that going to even be utilized?

I53-1

This is a very residential community. Most of us have two or three-car garages. In fact, all my neighbors have three-car garages and I doubt any of them will be utilizing your service.

I53-2

I do agree that you need Light Rail to be out to the airport and there are certain people that would take advantage of that, but it doesn't make sense to me that you're running an additional bridge over the park, where we all go to enjoy the river and the bike trail, etc., when you have a bridge that goes over the American River to Northgate.

I53-3

If you took Light Rail up Northgate, you have a

I53-4

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Response to Comment I52-3

Yolo County Transit District provides Yolobus service for West Sacramento, Davis, Woodland, and other communities in Yolo County. As stated on page 3-14 of the Draft PEIR, daily ridership on the Yolobus system is about 3,000 trips. Please contact the Yolo County Transit District for more information regarding ridership on the Yolobus system.

Response to Comment I53-1

On December 15, 2003, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project. This decision was based on an Alternatives Analysis process - the AA Report is provided as Appendix A of the Draft PEIR. Compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.

RT routes operating within the study area are listed in Table 3.2-2 of the Draft PEIR. RT bus routes with stops in the study area are the 11 Truxel Road, 13 Northgate, 14 Norwood, 86 San Juan/Silver Eagle, 87 Howe, and 88 West El Camino. These services connect from some locations in North or South Natomas to Downtown Sacramento or to the Arden/Del Paso Station. As shown in Table 3.6-2 of the Draft PEIR, the DNA project is expected to generate 15,910 weekday transit trips in the

DNA Corridor when it is completed in 2027. Regionally, the DNA project would contribute to approximately 179,000 weekday linked trips and 53 million annual linked trips on the RT system (Table 3.6-2 and Table 3.6-3). For the DNA project, 35.6 percent of all work trips to Downtown Sacramento from the DNA Corridor were forecasted to use transit (Table 3.6-4).

Response to Comment I53-2

Comment noted. People who use our light rail system pay as much as $4 per day for single-trip tickets, but as little as $2 per day for weekly or monthly passes. By comparison, driving their cars costs them over 50 cents per mile, not including the cost of parking. So, for the price of $2 per day, commuters can either go four miles by car, or they can get to and from work, and possibly even do some shopping or visit the doctor over lunch. RT's goal in building the DNA project is to fulfill a long-standing promise to the people of Sacramento, and particularly to the residents and businesses in Natomas, by providing a cost-effective, clean, and convenient transportation alternative for trips to downtown and trips to the airport.

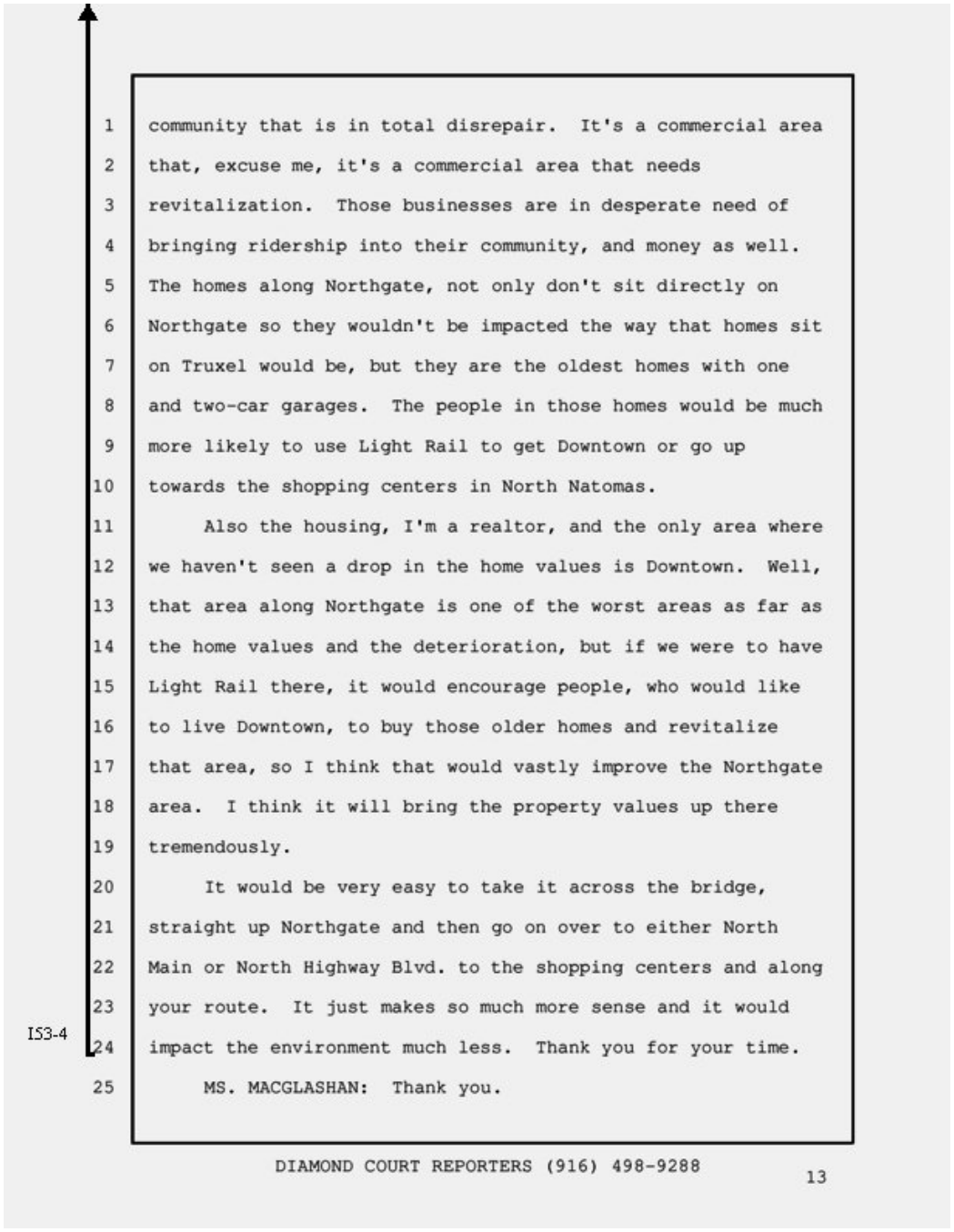
Response to Comment I53-3

Please refer to response to SABA Comment I8-3.

Response to Comment I53-4

The Northgate alignment was studied in 2001, in the original Alternatives Analysis that produced the current LPA along Truxel Rd (included as Appendix A in the PEIR). In the AA, the Northgate alignment was shown to reduce the construction costs only fractionally because the river crossing would have to be rebuilt. The operating costs of the Northgate alignment would have been higher, the distance to the airport would have been longer, and the line would have served far fewer business and apartment residences. Thus, the line's cost-effectiveness would have been much reduced. As it is, the Truxel Road alignment will serve many businesses, schools, the public library, and several apartment developments that would no be served by keeping the light rail in industrial areas.

As described in Section 4.9, page 4.9-12, of the Draft PEIR, park users would be temporarily affected by construction activities, including the movement of heavy equipment on park roads, restricted access, and temporary closure of some park properties, noise, dust, and other inconveniences associated with the construction of the American River crossing. These temporary disruptions would impair enjoyment of the American River Parkway on a temporary basis. However, implementation of Mitigation Measure MPARK-1 (as proposed in Section 4.9, page 4.9-14) would reduce temporary construction impacts in the American River Parkway and Discovery Park to a less-than-significant level. Operational impacts of the DNA project are presented in Section 4.9, page 4.9-13, of the Draft PEIR. Operation of the DNA project would require that 1.8-acres of the American River Parkway be dedicated as permanent transit right-of-way. However, all of the underlying area would be available for public use with the exception of the space required for the bridge piers. Additionally, the bridge would not present a barrier to pedestrians, hikers, bicyclists, or boaters.



community that is in total disrepair. It's a commercial area that, excuse me, it's a commercial area that needs revitalization. Those businesses are in desperate need of bringing ridership into their community, and money as well. The homes along Northgate, not only don't sit directly on Northgate so they wouldn't be impacted the way that homes sit on Truxel would be, but they are the oldest homes with one and two-car garages. The people in those homes would be much more likely to use Light Rail to get Downtown or go up towards the shopping centers in North Natomas.

Also the housing, I'm a realtor, and the only area where we haven't seen a drop in the home values is Downtown. Well, that area along Northgate is one of the worst areas as far as the home values and the deterioration, but if we were to have Light Rail there, it would encourage people, who would like to live Downtown, to buy those older homes and revitalize that area, so I think that would vastly improve the Northgate area. I think it will bring the property values up there tremendously.

It would be very easy to take it across the bridge, straight up Northgate and then go on over to either North Main or North Highway Blvd. to the shopping centers and along your route. It just makes so much more sense and it would impact the environment much less. Thank you for your time.

MS. MACGLASHAN: Thank you.

IS3-4

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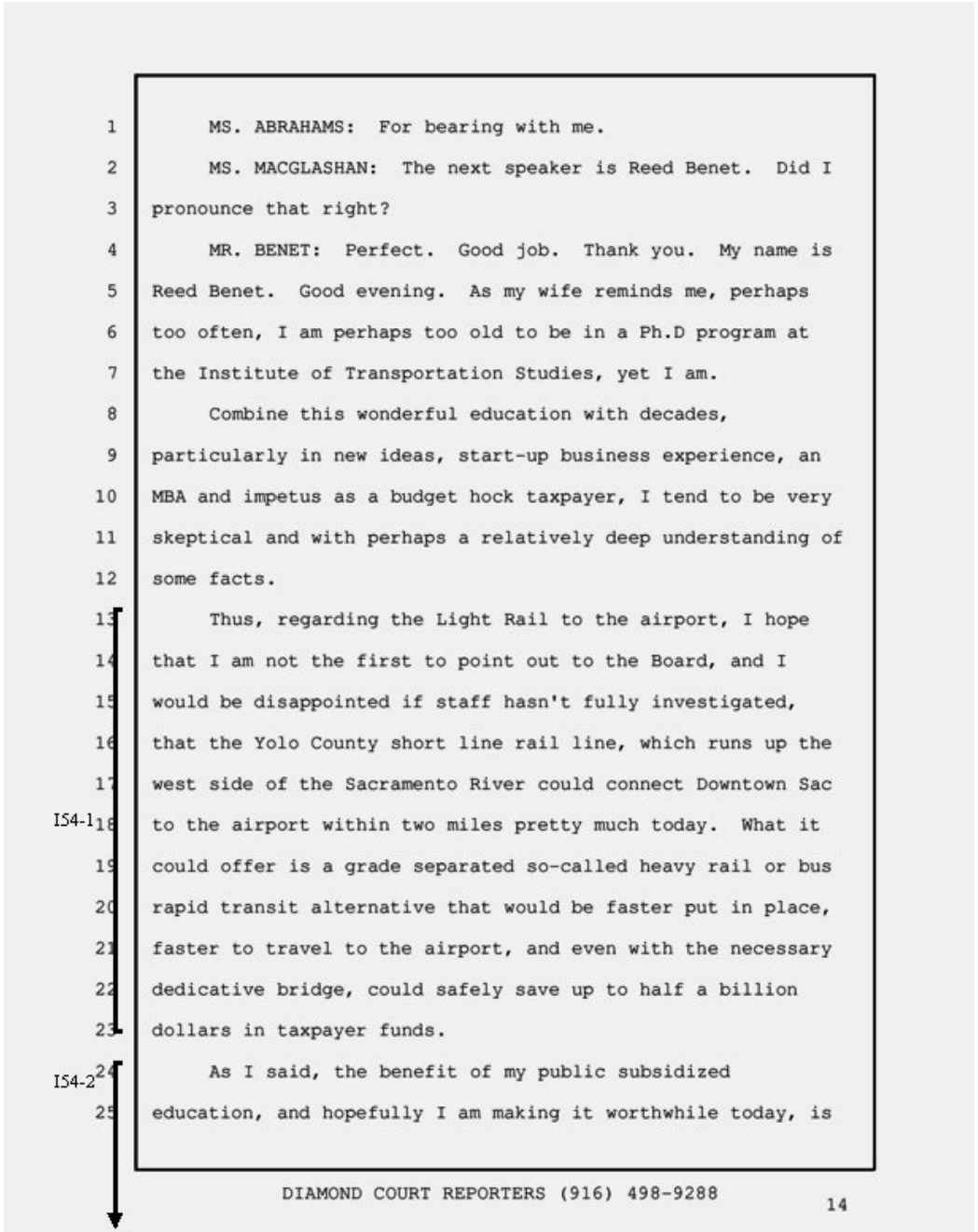
In addition, the RT Board of Directors selected the Truxel Road corridor as its Locally Preferred Alternative (LPA) for the DNA project because compared to the other alternatives, the Truxel Road corridor was determined to provide the greatest transportation benefit to transit users in the corridor and in the region. In summary, these benefits include: (1) higher ridership, (2) greater connectivity, (3) supportive of Transit-Oriented Development, (4) consistency with land use plans, (5) improved corridor mobility, (6) greater transit accessibility, (7) greater cost effectiveness, and (8) increased chance of attracting federal funding.



MS. ABRAHAMS: For bearing with me.

MS. MACGLASHAN: The next speaker is Reed Benet. Did I pronounce that right?

MR. BENET: Perfect. Good job. Thank you. My name is Reed Benet. Good evening. As my wife reminds me, perhaps too often, I am perhaps too old to be in a Ph.D program at the Institute of Transportation Studies, yet I am.

Combine this wonderful education with decades, particularly in new ideas, start-up business experience, an MBA and impetus as a budget hock taxpayer, I tend to be very skeptical and with perhaps a relatively deep understanding of some facts.

Thus, regarding the Light Rail to the airport, I hope that I am not the first to point out to the Board, and I would be disappointed if staff hasn't fully investigated, that the Yolo County short line rail line, which runs up the west side of the Sacramento River could connect Downtown Sac to the airport within two miles pretty much today. What it could offer is a grade separated so-called heavy rail or bus rapid transit alternative that would be faster put in place, faster to travel to the airport, and even with the necessary dedicative bridge, could safely save up to half a billion dollars in taxpayer funds.

I54-1

As I said, the benefit of my public subsidized education, and hopefully I am making it worthwhile today, is

I54-2

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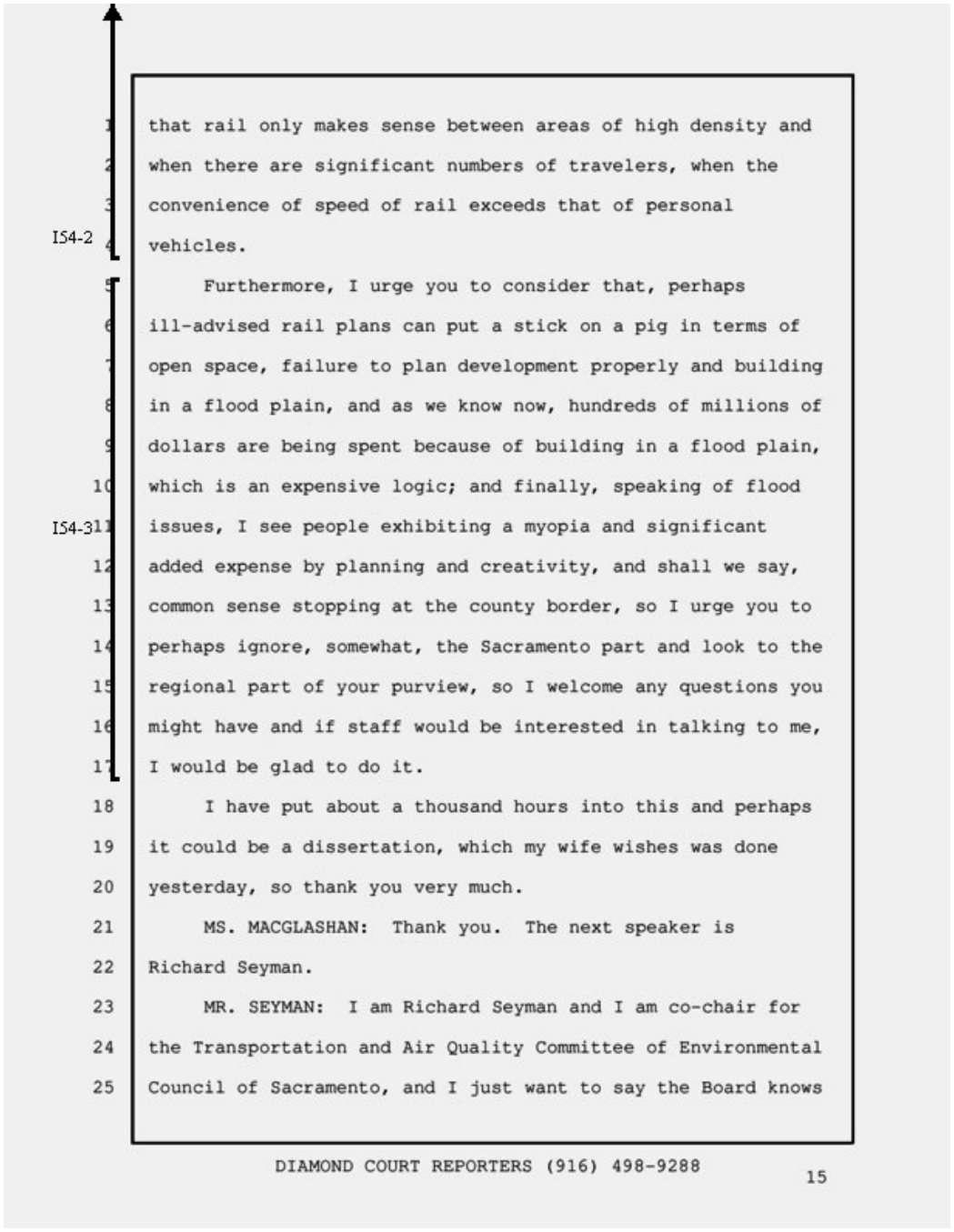
Response to Comment I54-1

Comment noted. Please see response to Comment I9-10.

Response to Comment I54-2

As shown in Table 3.6-2 of the Draft PEIR, the DNA project is expected to generate 15,910 weekday transit trips in the DNA Corridor when it is completed in 2027. Regionally, the DNA project would contribute to approximately 179,000 weekday linked trips and 53 million annual linked trips on the RT system (Table 3.6-2 and Table 3.6-3). For the DNA project, 35.6 percent of all work trips to Downtown Sacramento from the DNA Corridor were forecasted to use transit (Table 3.6-4).

People who use our light rail system pay as much as $4 per day for single-trip tickets, but as little as $2 per day for weekly or monthly passes. By comparison, driving their cars costs them over 50 cents per mile, not including the cost of parking. So, for the price of $2 per day, commuters can either go four miles by car, or they can get to and from work, and possibly even do some shopping or visit the doctor over lunch. RT's goal in building the Downtown-Natomas-Airport line is to fulfill a long-standing promise to the people of Sacramento, and particularly to the residents and businesses in Natomas, by providing a cost-effective, clean, and convenient transportation alternative for trips to downtown and trips to the airport.



that rail only makes sense between areas of high density and when there are significant numbers of travelers, when the convenience of speed of rail exceeds that of personal vehicles.

I54-2

Furthermore, I urge you to consider that, perhaps ill-advised rail plans can put a stick on a pig in terms of open space, failure to plan development properly and building in a flood plain, and as we know now, hundreds of millions of dollars are being spent because of building in a flood plain, which is an expensive logic; and finally, speaking of flood issues, I see people exhibiting a myopia and significant added expense by planning and creativity, and shall we say, common sense stopping at the county border, so I urge you to perhaps ignore, somewhat, the Sacramento part and look to the regional part of your purview, so I welcome any questions you might have and if staff would be interested in talking to me, I would be glad to do it.

I54-3

I have put about a thousand hours into this and perhaps it could be a dissertation, which my wife wishes was done yesterday, so thank you very much.

MS. MACGLASHAN: Thank you. The next speaker is Richard Seyman.

MR. SEYMAN: I am Richard Seyman and I am co-chair for the Transportation and Air Quality Committee of Environmental Council of Sacramento, and I just want to say the Board knows

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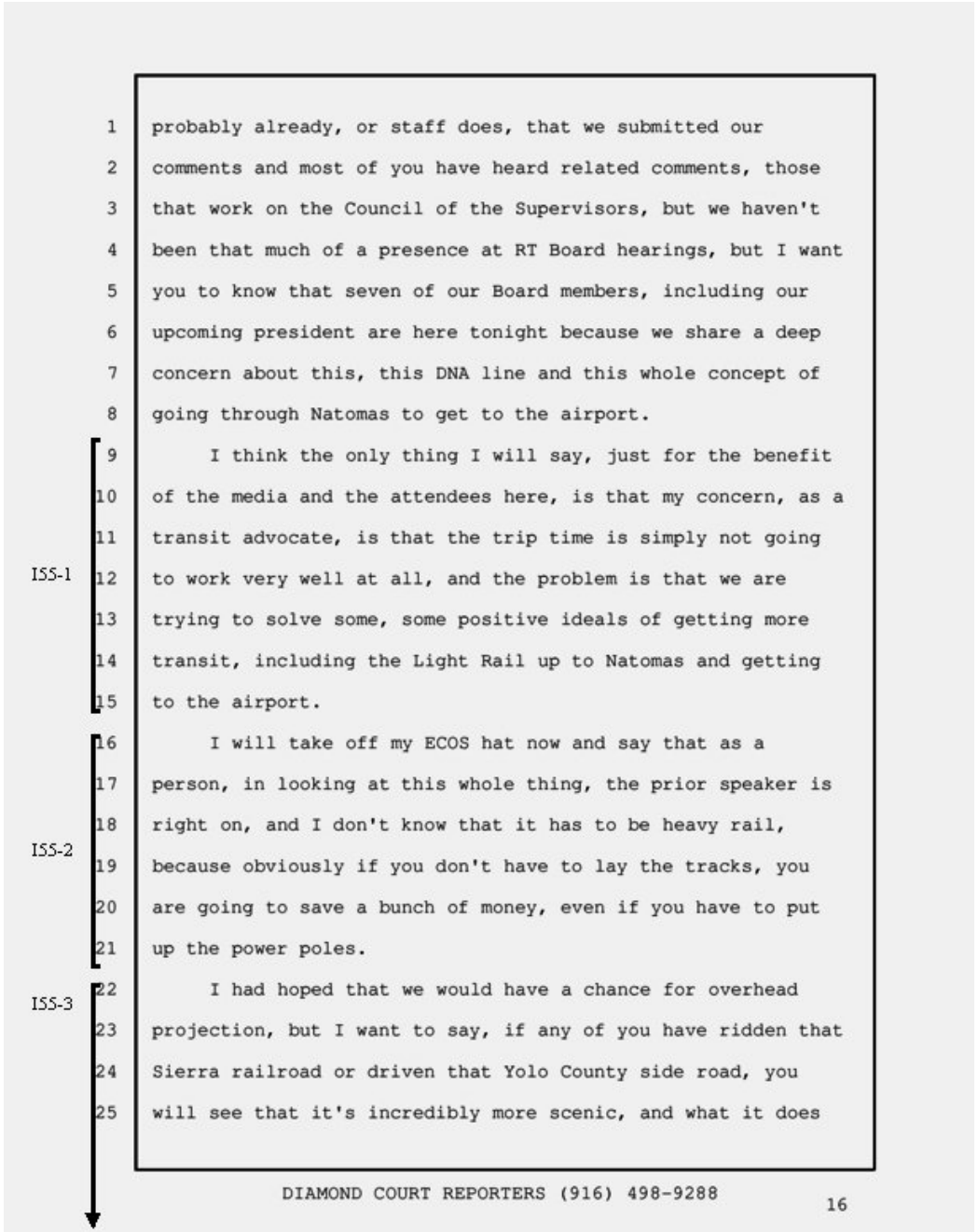
Response to Comment I54-3

Thank you for your comment.



probably already, or staff does, that we submitted our comments and most of you have heard related comments, those that work on the Council of the Supervisors, but we haven't been that much of a presence at RT Board hearings, but I want you to know that seven of our Board members, including our upcoming president are here tonight because we share a deep concern about this, this DNA line and this whole concept of going through Natomas to get to the airport.

I think the only thing I will say, just for the benefit of the media and the attendees here, is that my concern, as a transit advocate, is that the trip time is simply not going to work very well at all, and the problem is that we are trying to solve some, some positive ideals of getting more transit, including the Light Rail up to Natomas and getting to the airport.

I will take off my ECOS hat now and say that as a person, in looking at this whole thing, the prior speaker is right on, and I don't know that it has to be heavy rail, because obviously if you don't have to lay the tracks, you are going to save a bunch of money, even if you have to put up the power poles.

I had hoped that we would have a chance for overhead projection, but I want to say, if any of you have ridden that Sierra railroad or driven that Yolo County side road, you will see that it's incredibly more scenic, and what it does

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I55-1

I55-2

I55-3

Response to Comment I55-1

As stated on page 3-35 of the Draft PEIR, transit travel times for trips within the DNA Corridor and specifically to Downtown would improve under the DNA project compared to the future no-project conditions (2027) for most of the four trip interchanges analyzed (Impact TRAN-2). Please refer to Section 3.6, Transit Impacts - Full DNA Project (2027), beginning on page 3-34 of the Draft PEIR, for a description of the impacts of the DNA project on drive and transit travel times.

Response to Comment I55-2

Assuming the commenter is referring to the use of the Yolo County short line rail, please refer to response to Comment I9-9.

Response to Comment I55-3

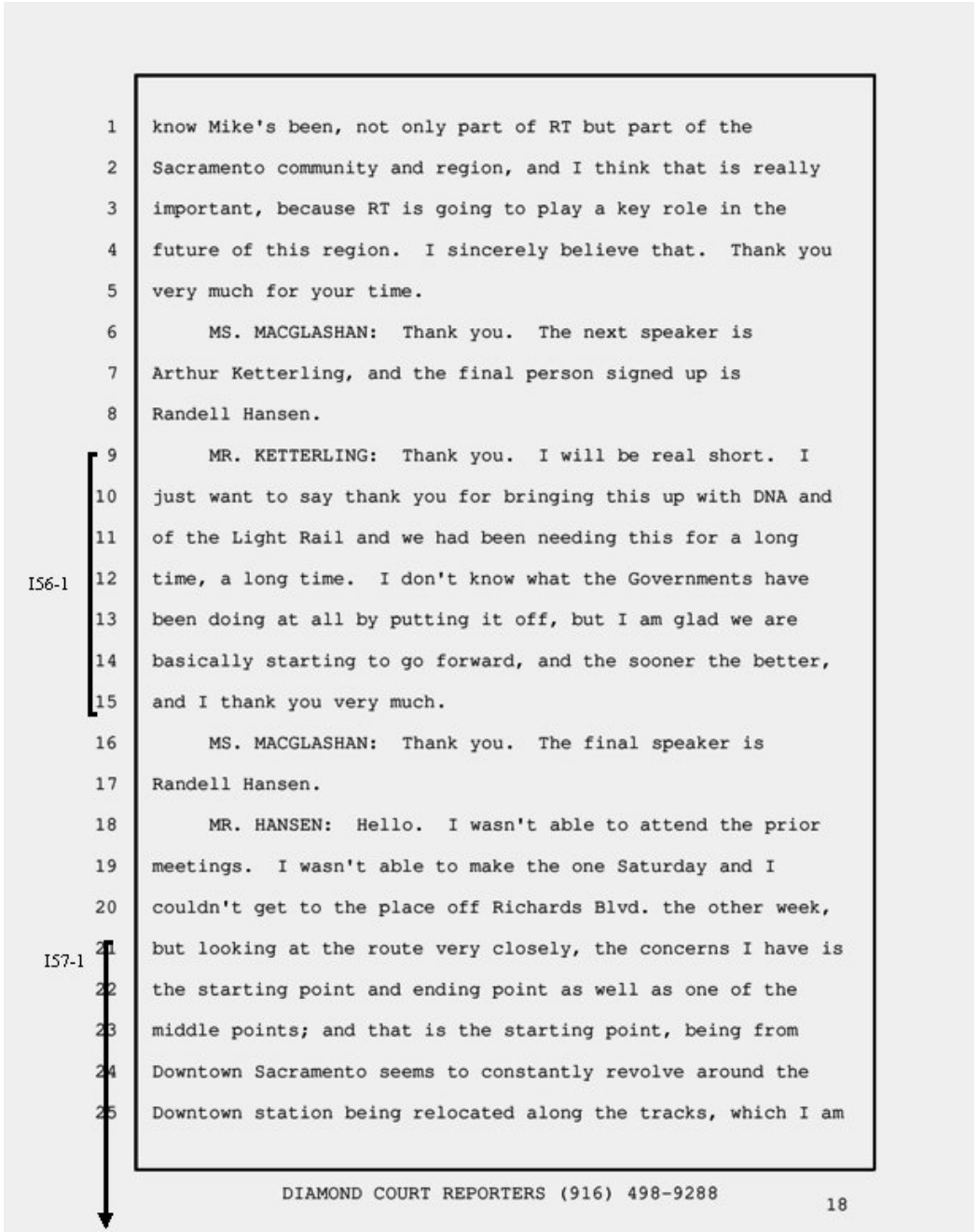
Comment noted. Please see response to Comment I9-10.

is it brings you right up next to the river, some of the nicest area of the river, if our project is simply to make a stellar way to come into town for our visitors, and I continue to say that would be the way to go, and as you pointed out, almost all the tracks are already laid.

On top of that, it would foster development in an area that is much more currently, the regular residents are more transit dependent, also an area that needs revitalization and an area, West Sacramento, Broderick that are very, very close to the Downtown, so that is just -- it's a wild idea. I realize there has been so many that has gone before me on this. I55-3

The one thing I want to do before I sit down is extend my congratulations, and I think I can extend ECOS's as well. We talked, we met with Mike a number of times. We worked with him really well in my former work with Para Transit. I have to say, in large part or in substantial part, why I got hired were concerns about RT and relations and I think that Mike played a key role in making that work much more feasible, to work out some difficult problems.

I was constantly impressed by his great professionalism, his ability, with the greatest of decorum, to deal with situations and circumstances where people came to the table with good reasons to feel there was some conflict, and so I think it just bodes very well; and the final thing is just I



know Mike's been, not only part of RT but part of the Sacramento community and region, and I think that is really important, because RT is going to play a key role in the future of this region. I sincerely believe that. Thank you very much for your time.

MS. MACGLASHAN: Thank you. The next speaker is Arthur Ketterling, and the final person signed up is Randell Hansen.

MR. KETTERLING: Thank you. I will be real short. I just want to say thank you for bringing this up with DNA and of the Light Rail and we had been needing this for a long time, a long time. I don't know what the Governments have been doing at all by putting it off, but I am glad we are basically starting to go forward, and the sooner the better, and I thank you very much.

I56-1

MS. MACGLASHAN: Thank you. The final speaker is Randell Hansen.

MR. HANSEN: Hello. I wasn't able to attend the prior meetings. I wasn't able to make the one Saturday and I couldn't get to the place off Richards Blvd. the other week, but looking at the route very closely, the concerns I have is the starting point and ending point as well as one of the middle points; and that is the starting point, being from Downtown Sacramento seems to constantly revolve around the Downtown station being relocated along the tracks, which I am

I57-1

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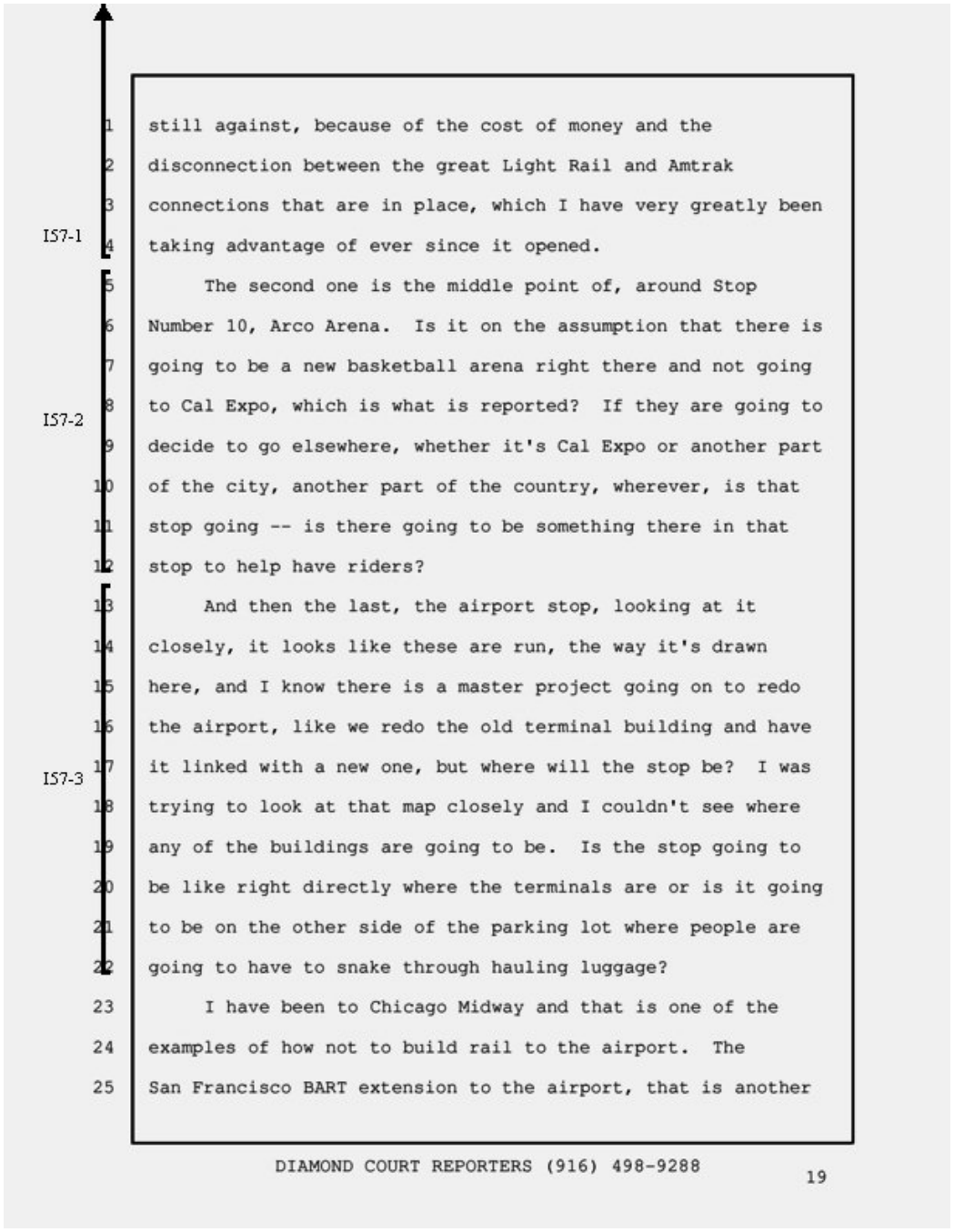
Response to Comment I56-1

Thank you for your comment. RT appreciates your support for the project.

Response to Comment I57-1

Comment noted. Whether the existing Downtown rail station is moved a few hundred feet or so, will not have a significant effect on the DNA project. Furthermore, the decision to move the station is independent of the DNA project and is not included in MOS-1.



still against, because of the cost of money and the disconnection between the great Light Rail and Amtrak connections that are in place, which I have very greatly been taking advantage of ever since it opened.

I57-1

The second one is the middle point of, around Stop Number 10, Arco Arena. Is it on the assumption that there is going to be a new basketball arena right there and not going to Cal Expo, which is what is reported? If they are going to decide to go elsewhere, whether it's Cal Expo or another part of the city, another part of the country, wherever, is that stop going -- is there going to be something there in that stop to help have riders?

I57-2

And then the last, the airport stop, looking at it closely, it looks like these are run, the way it's drawn here, and I know there is a master project going on to redo the airport, like we redo the old terminal building and have it linked with a new one, but where will the stop be? I was trying to look at that map closely and I couldn't see where any of the buildings are going to be. Is the stop going to be like right directly where the terminals are or is it going to be on the other side of the parking lot where people are going to have to snake through hauling luggage?

I57-3

I have been to Chicago Midway and that is one of the examples of how not to build rail to the airport. The San Francisco BART extension to the airport, that is another

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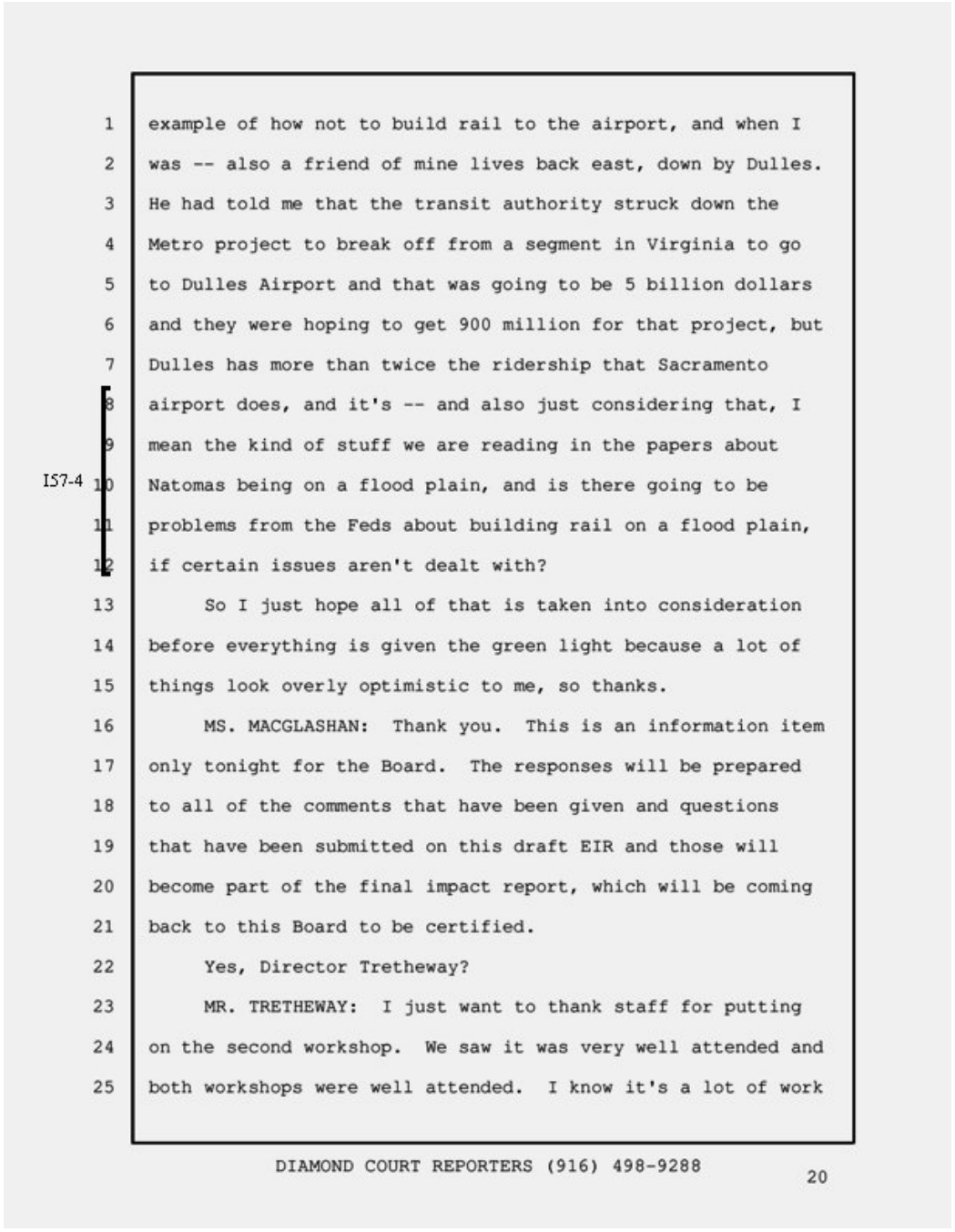
Response to Comment I57-2

At this time, there are no definite plans for the Sacramento Kings to move from their current location at ARCO Arena. The residential and commercial/office development in the area around ARCO Arena and in North Natomas is not dependent upon the Sacramento Kings remaining at ARCO Arena. Furthermore, the exact alignment of this phase of the DNA project will be determined during future project-level design, engineering, and environmental review, which will provide an opportunity to adjust the alignment at ARCO Arena, if necessary.

Response to Comment I57-3

Please refer to the responses to the Comment Letter CO4 from the Sacramento County Airport System (SCAS).



example of how not to build rail to the airport, and when I was -- also a friend of mine lives back east, down by Dulles. He had told me that the transit authority struck down the Metro project to break off from a segment in Virginia to go to Dulles Airport and that was going to be 5 billion dollars and they were hoping to get 900 million for that project, but Dulles has more than twice the ridership that Sacramento airport does, and it's -- and also just considering that, I mean the kind of stuff we are reading in the papers about Natomas being on a flood plain, and is there going to be problems from the Feds about building rail on a flood plain, if certain issues aren't dealt with?

I57-4

So I just hope all of that is taken into consideration before everything is given the green light because a lot of things look overly optimistic to me, so thanks.

MS. MACGLASHAN: Thank you. This is an information item only tonight for the Board. The responses will be prepared to all of the comments that have been given and questions that have been submitted on this draft EIR and those will become part of the final impact report, which will be coming back to this Board to be certified.

Yes, Director Tretheway?

MR. TRETHEWAY: I just want to thank staff for putting on the second workshop. We saw it was very well attended and both workshops were well attended. I know it's a lot of work

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Response to Comment I57-4

A discussion of the flood risk in Sacramento is provided on Pages 4.18-5 and 4.18-6 in Section 4.18, Water Resources, of the Draft PEIR. As stated in the Draft PEIR, the DNA project area in downtown Sacramento is designated by the Federal Emergency Management Agency (FEMA) as Zone X, an area protected from the base flood by the construction of a levee, dike, or other structural measure. Therefore, the area is not considered at risk for significant flood hazard as designated by FEMA.

In the Natomas Basin, the US Army Corps of Engineers (USACE) is moving forward with a Zone AR designation. As defined by FEMA, Zone AR designates a Special Flood Hazard Area formerly protected from the one percent annual chance of flood by a flood control system that was subsequently decertified and indicates that the former control system is being restored to provide protection from the one percent annual chance or greater flood. On September 27, 2007, FEMA denied an application from the City of Sacramento to designate the Natomas Basin Zone A-99, which denotes an area to be protected from one percent annual chance of flood by a Federal flood protection system under construction. The Sacramento Area Flood Control Agency is working with the City of Sacramento and the USACE to expedite work on the Natomas levee system. SAFCA has numerous projects under construction and in-planning in the Natomas area. The Draft PEIR acknowledges the USACE's recent decertification of the Natomas levee system on page 4.18-6:

“Recent local and federal studies; however, revealed that much more of the Natomas levee system is in need of repair, including erosion protection, seepage protection,

and increased levee height. As a result of these studies, the USACE recently withdrew its endorsement of the Natomas levee system. SAFCA is prioritizing work efforts for areas and levees that are at higher risk to the 100-year flood event, but all levee improvement projects are being designed to the 200-year protection specifications."

The Draft PEIR is the first-tier of environmental review for the DNA project. The second phase of the DNA project, which includes the planned river crossing into South Natomas, is tentatively scheduled to commence planning in late 2010. The project-level environmental review required at that time will provide an opportunity to reassess the level of flood risk in the Natomas Basin and incorporate the conditions into project design.

for each project. Thank you very much.

MS. MACGLASHAN: Director Cohn?

MR. COHN: The next step is certification?

MS. MACGLASHAN: First preparation of the final EIR and then certification.

MR. COHN: I just want to say a couple comments in response to some of the comments I heard tonight.

The future of whether the existing Downtown rail station is moved a few hundred feet or not is not going to have a significant effect on this line. I mean, you're only talking about whether it should move a few hundred feet and that is an independent decision about this line.

And if Arco Arena is moved, there will be something else there and the proposed line goes right through the town center of Natomas, and of course, the details of where this will go at the airport are for the future. This is a program --

MS. MACGLASHAN: I believe it's -- actually it's shown at the county. The airport is a county airport and there is, there are diagrams that show where the station --

MR. DICKINSON: The station would come right up next to the terminal.

MR. COHN: The other thing I find hard to understand is how building two bridges across the Sacramento River would be cheaper than one across the American River, which I heard

proposed, that we go into Yolo County and then come back into Sacramento County, and you would be serving very little population on the way to the airport, as opposed to the proposed line, which would serve one the fastest growing areas in the city.

Now, I understand there are people that don't think we should be going in Natomas, and that is a legitimate argument to make, but the fact that we are -- there is already a sizable population, and the airport is growing.

I thank folks for their comments, but I think there is going to come a time, by the time this thing is built, that the ridership is going to be there, so I appreciate the comments though. Thank you.

MS. MACGLASHAN: Okay. Thank you. That concludes this item and we are ready for the next item.

(The record concluded at 8:05 p.m.)

STATE OF CALIFORNIA)
) ss.
COUNTY OF SACRAMENTO)

I, JILL R. MCLEOD, Certified Shorthand Reporter of the State of California, do hereby certify that the foregoing pages comprise a full, true and correct transcription of my stenographic notes in the aforementioned case of the proceedings held on February 25, 2008.

Dated this 17th day of March, 2008.

JILL R. MCLEOD, CSR 10071

CHAPTER 4.0: ERRATA

4.1 INTRODUCTION

This section includes edits to the Draft PEIR. These modifications are a result of response to comments received during the public review period, as well as those changes initiated by the Lead Agency and/or consultants based on their on-going review.

Revisions herein do not result in new significant environmental impacts, do not represent significant new information, nor do they amend the conclusions of the environmental analysis. Therefore, recirculation of Draft PEIR pursuant to State CEQA Guidelines Section 15088.5 is not warranted.

Changes are provided in revision marks with underline for new text and ~~strike-through~~ for deleted text. Text changes are presented in the page order in which they appear in the Draft PEIR.

4.2 CHANGES AND EDITS TO THE DRAFT PEIR

4.2.1 Table of Contents - Tables

Table 3.9-1 Estimated Parking Demand at Park-and-Ride Lots

Table 4.7-3 Disproportionately High and Adverse Impacts to Low-Income and Minority Populations

Table 4.14-1 Direct Construction Impacts on Wildlife Habitat in the American River Parkway (acres) (100-foot-wide swath)

4.2.2 Executive Summary

Draft PEIR page ES-2, Section 2.1, is revised as follows:

> "The DNA study area, shown on Figure ES-1, extends 12.8 miles from 7th and H Streets in Downtown Sacramento to the Sacramento International Airport and includes the communities of Alkali Flat, South Natomas, North Natomas, and Metro Air Park. Between State Route (SR) 99 and Powerline Road, the study area traverses the Greenbriar property, which ~~is under consideration for a large residential development~~ the Sacramento Local Agency Formation Commission approved for annexation into the City of Sacramento in April 2008. The study area was developed in 2002 to be sufficiently broad to encompass the entire range of alternatives under consideration at that time. See Chapter 5, Alternatives, for more information. This study area is also referred to as the "DNA Corridor.""

Draft PEIR page ES-5, top of page, is revised as follows:

> "The rate of growth in North Natomas has exceeded City of Sacramento expectations ~~and development activities have not slowed down~~, as evidenced by the development

proposals that continue to be submitted to the City and County, indicating that growth will continue in the DNA Corridor."

Draft PEIR page ES-5, sixth tick, is revised as follows:

- The Railyards Redevelopment Plan proposes development of the 240-acre Union Pacific Railroad property. The project, approved by the Sacramento City Council in December 2007, would consist of 11,000 homes, 1.3 million square feet of retail, and 2.9 million square feet of office space, hotels, restaurants, entertainment venues, and open space. A ~~l~~Light rail stations ~~are~~ is identified in the Plan adjacent to the proposed Sacramento Intermodal Transportation Facility and on 7th Street south of North B Street; and"

Draft PEIR page ES-8, second bullet, is revised as follows:

"Air Quality Nonattainment Area. The project would be located in a federally designated nonattainment area for air quality and, therefore, must meet transportation conformity requirements at the regional and project levels. The DNA project would provide a small benefit to the region's air quality by reducing vehicle miles traveled by approximately ~~one~~ 0.02 percent as compared to future conditions."

Draft PEIR page ES-11, Section ES 3.1, first paragraph is revised as follows:

"The alignment would originate at 7th and H Streets, adding a second track parallel to the existing Gold Line. Heading west on H Street, the DNA line would then loop north ~~along~~ on the ~~west~~ east side of the intermodal site, west of the proposed extension of 5th Street to the relocated Sacramento Valley Station (part of the future Intermodal Facility)[1]."

Draft PEIR page ES-11, Section ES 3.1, second paragraph is revised as follows:

"Continuing ~~north~~ east, the loop would then connect to a future extension of F Street and continue north along 7th Street, operating through the existing 7th Street undercrossing of the Union Pacific Railroad. From this point north, the alignment would continue to follow North 7th Street to Richards Boulevard. At North 7th Street and Richards Boulevard, the alignment would cross Richards Boulevard and turn to the west to follow a semi-exclusive guideway on the north side of the street."

Draft PEIR page ES-17, Table ES 1 is revised as follows:

Table ES 1
Capital Costs for DNA Project
(Millions of 2006$)

Scenario	Construction Costs	Vehicles	Right-of-Way	Final Engineering, Construction Management, Project Reserve	Total Costs
DNA Project	392.9	106.9	68.2	217.3	785.3
MOS-1	20.8	0	5.8	10.8	37.4

Draft PEIR, page ES-26, Section ES 9, is revised as follows:

> "~~Despite strong community support for the project, t~~The complexity and financial investment involved in building ~~it~~ the DNA project will require RT to strategically phase the construction of the DNA project, hence the development of MOS-1. Significant development proposals in the Railyards and Richards Boulevard area are poised to begin construction, all of which anticipate light rail stations adjacent to their developments. Ideally, these projects along with the DNA line should be implemented in the same timeframe. In addition, a statewide ballot measure was approved by voters in November 2006 that will provide RT with additional funds for continuing DNA project development, but not construction."

Draft PEIR page ES-27, third bullet, is revised as follows:

> "The City of Sacramento has approved the construction of an 810,000-square-foot office complex on the northeast corner of Richards Boulevard and North 7th Street, an easy two-to-three minute walking distance from the proposed Richards Boulevard Station. A ~~three~~ six to eight level parking structure would be built that could also provide some RT station parking."

Draft PEIR page ES-27, fifth bullet, is revised as follows:

> "In the summer of 2005, the City of Sacramento circulated a Notice of Preparation of a Draft Environmental Impact Report for the proposed Greenbriar Project. The Sacramento Local Agency Formation Commission approved Greenbriar for annexation into the City of Sacramento in April 2008. Should this project proceed and be built, it will provide RT with potential system users, dedicated property for the LRT alignment and $2.2 million in developer funds to build a new rail station and Park-and-Ride lot."

Draft PEIR, Table ES-6 is revised as follows:

> Refer to page ES-28 of the Executive Summary of the Attachment for revised Table ES-6

4.2.3 Chapter 1

Draft PEIR page 1-2, Section 1.2, is revised as follows:

> "The DNA study area, shown on Figure 1.2-1, extends 12.8 miles from 7th and H Streets in Downtown Sacramento to the Sacramento International Airport and includes the communities of Alkali Flat, South Natomas, North Natomas, and Metro Air Park. Between State Route (SR) 99 and Powerline Road, the study area traverses the Greenbriar property, which is under consideration for a large residential development the Sacramento Local Agency Formation Commission approved for annexation into the City of Sacramento in April 2008. The study area was developed in 2002 to be sufficiently broad to encompass the entire range of alternatives under consideration at that time. See Chapter 5, Alternatives, for more information. This study area is also referred to as the "DNA Corridor.""

Draft PEIR page 1-9, first bullet, is revised as follows:

> "Population estimates completed for the Corridor indicate that the study area population will increase at an annual compounded growth rate of ~~2~~ 3 percent from 2000 to 202~~5~~7, compared to ~~1.1~~ percent for the City of Sacramento, and ~~1.3~~ 2 percent for the County of Sacramento."

Draft PEIR page 1-10, first bullet, is revised as follows:

> "The *Railyards Redevelopment Plan* proposes development of the 240-acre Union Pacific Railroad property. As proposed, the project would consist of 11,000 homes, 1.3 million square feet of retail, and 2.9 million square feet of office space, hotels, restaurants, entertainment venues, and open space. ~~A l~~Light rail stations are ~~is~~ identified in the Plan adjacent to the proposed Sacramento Intermodal Transportation Facility and on 7th Street adjacent to the residential development and the community facilities development. The Railyards Redevelopment Plan was approved by the City Council in December 2007."

Draft PEIR page 1-10, fourth bullet, is revised as follows:

> "Greenbriar is a proposal to build a new residential and commercial development project on 577 acres between Metro Air Park and SR 99. The Sacramento Local Agency Formation Commission approved Greenbriar for annexation into the City of Sacramento in April 2008. This project would include 3,500 high-, medium-, and low-density homes; 50 acres of commercial development; and a light rail station at the southern edge of the development."

Draft PEIR page 1-11, second paragraph, is revised as follows:

> "Also in 2004, the City of Sacramento ~~adopted plans for construction~~ approved a concept design for ~~of~~ the new Intermodal Facility within the Railyards to provide connections for local and express bus and light rail services, intercity buses, the Capitol Corridor commuter rail, and Amtrak. Currently, the Capitol Corridor passenger train service provides 32 trains daily between Sacramento and the San Francisco Bay Area. It is the third busiest Amtrak-provided route in the nation with nearly 1.3 million annual riders, a figure that has tripled within the past seven years. The Intermodal Facility incorporates the future DNA light rail alignment and station."

4.2.4 Chapter 2

Draft PEIR page 2-1, Section 2.2, first paragraph, is revised as follows:

> "The alignment would originate at 7th and H Streets, adding a second track to the north and parallel to the existing Gold Line. Heading west on H Street, the DNA line would then loop north along the west side of the proposed extension of 5th Street to the relocated Sacramento Valley Station (part of the future Intermodal Facility)[1]. It should be noted that as part of the relocation of the Sacramento Valley Station, RT would be responsible for funding construction of one-half of the station platform and improvements, with the City of Sacramento to pay for the remaining construction."

Draft PEIR page 2-2, second paragraph is revised as follows:

> "Continuing ~~north~~ east, the loop would then connect to a future extension of F Street and continue north along 7th Street, operating through the existing 7th Street undercrossing of the Union Pacific Railroad. From this point north, the alignment would continue to follow North 7th Street to Richards Boulevard. At North 7th Street and Richards Boulevard, the alignment would cross Richards Boulevard and turn to the west to follow a semi-exclusive guideway on the north side of the street."

Draft PEIR page 2-8, Table 2.3-1, #2, #9, and #10, are revised as follows:

Table 2.3-1
Stations Proposed for the DNA Project

Stations	Station Location (Park-and-Ride Lot Location)	Park-and-Ride Spaces
1. 7th and H Streets	North side of H Street between 7th and 8th Streets	0
2. Sacramento Valley Station (Amtrak)	West of ~~On~~ 5th Street between G and H Streets	0
3. Railyards	Along North 7th Street south of North B Street	0
4. Richards Boulevard at North 7th Street	Northwest corner of North 7th Street and Richards Boulevard	0
5. West El Camino Avenue	Intersection of West El Camino Avenue and Truxel Road, platform located south of the intersection (A parking structure would be built on the southwest corner of West El Camino Avenue and Truxel Road and assumes acquisition of the existing shopping center property. Options include either a parking structure south of the shopping center at Mill Creek Drive or surface parking lots provided at both locations.)	410
6. Pebblestone Way	Intersection of Pebblestone Way and Truxel Road (Existing shared parking at Natomas Community Center parking lot)	140
7. San Juan Road	Northeast corner of San Juan Road and Truxel Road (Parking on west side of Truxel Road, north of Vallarta Circle)	200[a]
8. Gateway Park/Natomas Marketplace	Northeast corner of Gateway Park Boulevard and Truxel Road (Parking would be provided at two sites: at-grade parking at Natomas Marketplace west of Truxel Road, and at a structured parking facility at the Promenade at Natomas east of Truxel Road)	1,130[b]
9. Arena Boulevard	South~~east~~ west corner of Arena Boulevard and Truxel Road	0
10. ARCO Arena (just south of the Arena entrance)	South~~east~~ west corner of Arena East Entrance Road and Truxel Road, with an optional spur track to serve special events. (Shared parking at Arena parking lot)	250
11. East Town Center	Northwest corner of Natomas Boulevard and Del Paso Road (Shared parking at Park Place Shopping Center)	90

Table 2.3-1
Stations Proposed for the DNA Project

Stations	Station Location (Park-and-Ride Lot Location)	Park-and-Ride Spaces
12. North Natomas Town Center	New Market Drive east of Town Center Drive	0
13. Club Center Drive/ North Village Center	East Commerce Parkway and Club Center Drive (Parking at new commercial center, obtained through Irrevocable Offers of Dedication [IODs])	40
14. Airport	New terminal building proposed by the Airport to be built south of the existing parking lot between Terminals A and B	0
Optional Stations		
15. Sequoia Pacific Boulevard at Richards Boulevard	North of Richards Boulevard along the railroad spur west of Sequoia Pacific Boulevard	0
16. Commerce Parkway	Along Commerce Parkway at North Park Drive	0
17. Greenbriar	Along Meister Way in the Greenbriar development (Parking at Meister Way adjacent to station)	50[c]
18. Metro Air Park	At the intersection of Metro Air Parkway and Meister Way (Parking at Meister Way adjacent to station)	250[c]
19. Airport-South Station	Just south of Crossfield Drive	0

Source: Based on 2006 modeling output.

Notes:

[a] Two acres of the Sonora Springs development project have been dedicated for a future Park-and-Ride facility

[b] A Condition of Approval for the Promenade at Natomas requires that acreage for surface parking be made available to RT for 350 Park-and-Ride spaces. A parking structure would need to be built to accommodate additional parking.

[c] Park-and-Ride spaces for optional stations were not included in the total Park-and-Ride requirements for each alternative.

Draft PEIR page 2-12, third paragraph is revised as follows:

> "For MOS-1, the alignment would begin at 7th and H Streets running north on 7th Street to F Street. This alignment is the same as the emergency courthouse by-pass ~~described above~~ <u>that would be built along 7th Street to by-pass the loop that passes by the Federal Courthouse</u>, and would remain in service with full implementation of the DNA project for periods when use of the by-pass is requested by the U.S. District Court. North of F Street, the alignment would continue on 7th Street to just north of the Union Pacific overcrossing. At this point, the alignment would follow North 7th Street. The construction of a Railyards station under MOS-1 would be deferred to correspond with development of the Railyards project. At Richards Boulevard, the alignment would turn west on an exclusive right-of-way on the north side of Richards Boulevard, ending at a station on Richards Boulevard and North 7th Street. The MOS-1 alignment is shown on Figure 2.7-1."

Draft PEIR page 2-17, Table 2.8-1 is revised as follows:

Table 2.8-1
Capital Costs for DNA Project
(Millions of 2006$)

Scenario	Construction Costs	Vehicles	Right-of-Way	Final Engineering, Construction Management, Project Reserve	Total Costs
DNA Project	392.9	106.9	68.2	217.3	785.3
MOS-1	20.8	0	5.8	10.8	37.4

4.2.5 Chapter 3

Draft PEIR page 3-3, Figure 3.2-1 is revised.

Refer to page 3-3 of Chapter 3.0 of the Attachment for revised Figure 3.2-1

Draft PEIR page 3-46, second paragraph is revised as follows:

"In terms of future ridership potential, a change in arena location to the Downtown area would most likely cause a net difference and a separate study would need to be conducted. However, for the purpose of this document, transit ridership was forecasted with the assumption of ARCO Arena located in ~~South~~ North Natomas."

Draft PEIR page 3-51, second bullet is revised as follows:

"~~Construction of an elevated Northgate Boulevard and w~~Widening of Northgate Boulevard ~~the roadway~~ between Garden Highway and SR 160;"

"~~Elevating Northgate Boulevard and w~~Widening to four lanes Northgate Boulevard ~~the roadway~~ between Garden Highway and SR 160;"

Draft PEIR page 3-54 is revised as follows:

"**Garden Highway/Truxel Road Intersection During PM Peak Hour**

Under future no-project conditions, ~~this~~ the intersection of Garden Highway and Truxel Road would operate at LOS "E" conditions in the PM peak hour (Table 3.8-8). The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "F" conditions in the PM peak hour (Table 3.8-8), causing a worsening of level of service resulting in a potentially significant impact (Impact TRAN-8)."

Draft PEIR page 3-81 is revised as follows:

"**Gateway Park Boulevard/Truxel Road Intersection During AM Peak Hour**

Under future no-project conditions, ~~this~~ the intersection of Gateway Park Boulevard and Truxel Road would operate at LOS "C" during the AM peak hour (Table 3.8-6). The DNA project would increase delay and degrade traffic operations to LOS "D" or "E" conditions during the AM peak hour (Table 3.8-8), causing a worsening of level of service (Impact TRAN-9). This would result in a potentially significant impact.

Gateway Park Boulevard/Truxel Road Intersection During PM Peak Hour

Under future no-project conditions, ~~this~~ the intersection of Gateway Park Boulevard and Truxel Road would operate at LOS "D" during the PM peak hour (Table 3.8-7). The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" condition during the PM peak hour (Table 3.8-8), causing a worsening of level of service (Impact TRAN-10). This would be a potentially significant impact.

Natomas Crossing/Truxel Road Intersection During AM Peak Hour

Under future no-project conditions, ~~this~~ the intersection of Natomas Crossing and Truxel Road would operate at LOS "C" during the AM peak hour (Table 3.8-6). The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the AM peak hour (Table 3.8-6), causing a worsening of level of service (Impact TRAN-11). This would be a potentially significant impact.

Del Paso/Truxel Road Intersection During AM Peak Hour

Under future no-project conditions, ~~this~~ the intersection of Del Paso Road and Truxel Road would operate at LOS "C" during the AM peak hour (Table 3.8-6). The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the AM peak hour (Table 3.8-6), causing a worsening of level of service (Impact TRAN-12). This would be a potentially significant impact.

Gateway Park/Del Paso Intersection During PM Peak Hour

Under future no-project conditions, ~~this~~ the intersection of Gateway Park Boulevard and Del Paso Road would operate at LOS "D" during the PM peak hour (Table 3.8-7). The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" conditions during the PM peak hour (Table 3.8-7), causing a worsening of level of service (Impact TRAN-13). This would be a potentially significant impact.

5th/H Intersection During AM Peak Hour

Under future no-project conditions, ~~this~~ the intersection of 5th Street and H Street would operate at LOS "D" during the AM peak hour (Table 3.8-6). The DNA project would increase delay and degrade traffic operations to LOS "E" conditions during the AM peak hour (Table 3.8-6), causing a worsening of level of service (Impact TRAN-14). This would be a potentially significant impact."

Draft PEIR page 3-82 is revised as follows:

"North 7th/Gateway Intersection During PM Peak Hour

Under future no-project conditions, ~~this~~ the intersection of North 7th Street and Gateway would operate at LOS "C" during the PM peak hour (Table 3.8-7). The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the PM peak hour (Table 3.8-7), causing a worsening of level of service (Impact TRAN-15). This would be a potentially significant impact.

Draft PEIR page 3-83, Section 3.8.3, is revised as follows:

"Potentially feasible mitigation measures were identified at intersections where changes in LOS were noted. These mitigation measures typically involve widening of one or more approaches to an intersection to accommodate additional turning lanes. In all cases, the proposed mitigation would need to be coordinated with and authorized by the City of Sacramento. RT will be responsible for implementation of the mitigation measures pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento."

Draft PEIR page 3-83 is revised as follows:

"Richards Boulevard/I-5 Southbound Ramp During PM Peak Hour (TRAN-4)

Under future (2014) no-project conditions, the Richards Boulevard/I-5 southbound ramp intersection would operate at LOS "C" during the PM peak hour but would degrade to LOS "D" with implementation of MOS-1 (Impact TRAN-4). The southbound approach to this intersection currently has two separate left turn lanes, a right turn lane, and a shared right turn lane. The impact could be mitigated by changing the shared right turn lane to a shared left turn lane for the southbound approach (Mitigation Measure MTRAN-4). RT will be responsible for implementation of Mitigation Measure MTRAN-4 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-4 would improve the flow of traffic through the intersection and maintain the intersection at LOS C, thus reducing the impact to a less-than-significant level."

Draft PEIR page 3-84 is revised as follows:

"**San Juan Road/Truxel Road Intersection During AM Peak Hour (TRAN-6)**

Under future (2027) no-project conditions, the intersection of Truxel Road and San Juan Road would operate at LOS "E" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "F" conditions during the AM peak hour. The addition of a second westbound right turn lane plus right turn overlap phasing on all approaches would mitigate the LOS impact at this intersection under the DNA project by improving the flow of traffic (Mitigation Measure MTRAN-6 and MTRAN-7). RT will be responsible for implementation of Mitigation Measure MTRAN-6 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-6 would reduce Impact TRAN-6 to a less-than-significant level.

San Juan Road/Truxel Road Intersection During PM Peak Hour (TRAN-7)

Under future no-project conditions, the intersection of Truxel Road and San Juan Road would operate at LOS "E" during the PM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "F" conditions during the PM peak hour. Mitigation would be the same as described above for the AM peak hour. RT will be responsible for implementation of Mitigation Measure MTRAN-7 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-7 would reduce Impact TRAN-7 to a less-than-significant level.

Garden Highway/Truxel Road Intersection During PM Peak Hour (TRAN-8)

Under future no-project conditions, this intersection would operate at LOS "E" conditions in the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "F" conditions in the PM peak hour. The *2006 MTP* includes widening of Garden Highway from two to four lanes. It is assumed that when the Garden Highway is widened, a second eastbound left turn lane would be added at the intersection with Truxel Road. The additional delay due to the DNA project would cause an impact that could be mitigated by adding a westbound right turn lane on Garden Highway, which would improve the flow of traffic through the intersection (Mitigation Measure MTRAN-8). RT will be responsible for implementation of Mitigation Measure MTRAN-8 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-8 would reduce Impact TRAN-8 to a less-than-significant level.

Gateway Park Boulevard/Truxel Road Intersection During AM Peak Hour (TRAN-9)

Under future no-project conditions, this intersection would operate at LOS "C" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" or "E" conditions during the AM peak hour. To mitigate this impact, a "free" right turn lane for northbound traffic should be provided by widening Gateway Park Boulevard (along its southeast side, east of Truxel Road) so that northbound right turns can turn into their own lane and travel a couple hundred feet before this added "receiving" lane tapers and vehicles must merge with through traffic on Gateway Park Boulevard (Mitigation Measures MTRAN-9 and MTRAN-10). RT will be responsible for implementation of Mitigation Measure MTRAN-9 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-9 would reduce Impact TRAN-9 to a less-than-significant level."

Draft PEIR page 3-85 is revised as follows:

"Gateway Park Boulevard/Truxel Road Intersection During PM Peak Hour (TRAN-10)

Under future no-project conditions, this intersection would operate at LOS "D" during the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" condition during the PM peak hour.

Mitigation would be the same as described above for the AM peak hour. RT will be responsible for implementation of Mitigation Measure MTRAN-10 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-10 would reduce Impact TRAN-10 to a less-than-significant level.

Natomas Crossing/Truxel Road Intersection During AM Peak Hour (TRAN-11)

Under future no-project conditions, this intersection would operate at LOS "C" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the AM peak hour. A right turn overlap phasing on the southbound and eastbound approaches would mitigate the impact at this intersection (Mitigation Measure MTRAN-11). RT will be responsible for implementation of Mitigation Measure MTRAN-11 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-11 would reduce Impact TRAN-11 to a less-than-significant level.

Del Paso/Truxel Road Intersection During AM Peak Hour (TRAN-12)

Under future no-project conditions, this intersection would operate at LOS "C" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the AM peak hour. The LOS impact could be mitigated by providing a "free" right turn lane for southbound traffic merging into Del Paso Road (Mitigation Measure MTRAN-12). RT will be responsible for implementation of Mitigation Measure MTRAN-12 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-12 would reduce Impact TRAN-12 to a less-than-significant level.

Gateway Park/Del Paso Intersection During PM Peak Hour (TRAN-13)

Under future no-project conditions, this intersection would operate at LOS "D" during the PM peak hour. The DNA project would increase the average vehicle delay by more than 5 seconds and result in LOS "E" conditions during the PM peak hour. A right turn overlap phasing on the northbound approach would mitigate the LOS impact at this intersection (Mitigation Measure MTRAN-13). RT will be responsible for implementation of Mitigation Measure MTRAN-13 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-13 would reduce Impact TRAN-13 to a less-than-significant level."

Draft PEIR page 3-86 is revised as follows:

"5th/H Intersection During AM Peak Hour (TRAN-14)

Under future no-project conditions, this intersection would operate at LOS "D" during the AM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "E" conditions during the AM peak hour. The southbound approach to this intersection currently has a separate left turn lane. The LOS impact could be mitigated by changing the separate left turn lane to a shared left lane for the

southbound approach (Mitigation Measure MTRAN-14). RT will be responsible for implementation of Mitigation Measure MTRAN-14 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-14 would reduce Impact TRAN-14 to a less-than-significant level.

North 7th/Gateway Intersection During PM Peak Hour (TRAN-15)

Under future no-project conditions, this intersection would operate at LOS "C" during the PM peak hour. The DNA project would increase delay and degrade traffic operations to LOS "D" conditions during the PM peak hour. The LOS impact of the DNA project could be mitigated by adding a westbound through lane on Gateway (Mitigation Measure MTRAN-15). RT will be responsible for implementation of Mitigation Measure MTRAN-15 pursuant to the terms, conditions, and provisions of a Project Agreement between RT and the City of Sacramento. Implementation of Mitigation Measure MTRAN-15 would reduce Impact TRAN-15 to a less-than-significant level."

4.2.6 Chapter 4

Section 4.2

Draft PEIR, Figures 4.2-1, 4.2-2, 4.2-3, and 4.2-4, pages 4.2-3, 4.2-7, 4.2-9, and 4.2-11, respectively, are revised.

Refer to pages 4.2-3, 4.2-7, 4.2-9, and 4.2-11 of Section 4.2 of the Attachment for revised Figures 4.2-1, 4.2-2, 4.2-3, and 4.2-4, respectively

Draft PEIR page 4.2-5, second paragraph, is revised as follows:

"The American River travels through the southern part of the DNA project study area. It is bordered on both sides by levees that prevent high flows from flooding the Downtown area (to the south) and South Natomas (to the north). Contained within the levees is the waterway; and flood channel; American River Parkway, which that includes Discovery Park, bicycle and nature trails, natural areas of riparian vegetation,; and the adjacent Bannon Slough (which parallels the American River adjacent to Garden Highway). The south side levee is planned by the County for use as a multipurpose trail for vehicle maintenance access and non-vehicular park users. The Sacramento County Department of Regional Parks, Recreation, and Open Space is responsible for managing and maintaining the majority of this area. Parks are discussed in more detail in Section 4.9, Parklands."

Section 4.4

Draft PEIR page 4.4-9, fifth paragraph, is revised as follows:

"The neighborhoods of North Natomas have undergone considerable growth since the late 1990s. These neighborhoods are generally characterized by new suburban development, regional commercial centers, suburban office parks, and ARCO Arena. Much of the new residential development in the Sacramento area has occurred in

North Natomas. Multiple active neighborhood associations exist in the area, including the Natomas Community Association serving both North and South Natomas."

Section 4.8

Draft PEIR page 4.8-12, mitigation measure MCUL-7, is revised as follows:

"In addition, because of the relative proximity of the DNA Corridor to the prehistoric and protohistoric village site CA-SAC-26, and the high probability of encountering archeological resources during construction south of the American River, construction of the Truxel Road river crossing and the MOS-1 phase of the project has the potential to affect CA-SAC-26 sensitive resources. For these areas, RT shall implement the following mitigation measures (MCUL-7).

- Monitoring by a qualified archeologist during construction activity affecting previously undisturbed soils.
- Coordination with the Native American community for construction monitoring in sensitive areas.
- Installation of proper fencing, signage, and site security to prevent adverse effects or vandalism to sensitive areas.

Other phases of the DNA project also might warrant a higher level of mitigation than provided by MCUL-6. RT will consider the application of MCUL-7 to other project areas during future project-level analyses."

Section 4.9

Draft PEIR page 4.9-4, Table 4.9-1, is revised as follows:

44	American River Parkway*	Along the American River	County/ Parkway	120 (in study area)	23 mile (~~426~~ 4,600-acres total) greenbelt/park nature activities and numerous recreational uses and facilities that support these uses

48	Witter Ranch	North of San Juan e/o Witter Canal	Non City/ Existing	26	~~Unknown~~ County facility used for interpretative farm programs

Draft PEIR page 4.9-14, first bullet, is revised as follows:

- "Sponsor public design workshops with affected stakeholders and interested members of the public during Preliminary Engineering to encourage context-sensitive bridge and transit station area design that is consistent with Policy 5.7 of the 1985 American River Parkway Plan:

Policy 5.7 Structures that are in the Parkway or visible from the Parkway shall be of design, color, texture and scale that minimizes adverse visual intrusion into the Parkway.

5.7.1 Structures shall be constructed of naturalistic materials which blend with the natural environment.

5.7.2 Colors shall be earth tones, or shall blend with the colors of surrounding vegetation.

5.7.3 Structures may emulate authentic historic design, but shall be unobtrusive.

5.7.4 To the extent possible, structures shall be screened from view by native landscaping or other naturally occurring features.

5.7.5 Structures shall not include any commercial advertising.

5.7.6 Structures shall be located so that neither they, nor activities associated with them, cause damage to native plants or wildlife.

5.7.7 Structures shall be located so that neither they, nor activities associated with them, disrupt the recreational use of the Parkway, and such structures shall be consistent with the goals and policies of this plan.

5.7.8 Structures shall be of fire resistant construction and designed and located in a manner such that adequate emergency services and facilities can be provided."

Draft PEIR page 4.9-19, after third bullet, is revised as follows:

- "Consult with law enforcement staff during the design stage to help ensure that the bridge does not become an attractive nuisance for illegal activities."

Draft PEIR page 4.9-19, fourth bullet, is revised as follows:

"In coordination with Sacramento County ~~Department of~~ Regional Parks~~, Recreation, and Open Space~~ personnel, prepare a plan defining public safety measures to be implemented during project construction activities within Discovery Park."

Draft PEIR page 4.9-19, fifth bullet, is revised as follows:

"In coordination with Sacramento County ~~Department of~~ Regional Parks~~, Recreation, and Open Space~~ personnel, prepare a traffic and access management plan that includes the following provisions:…"

Section 4.10

Draft PEIR page 4.10-3, first bullet, is revised as follows:

"Has a greater negative impact on the safety and security of all members of the public, including transit patrons and American River Parkway visitors, than they would otherwise experience in public space;"

Section 4.12

Draft PEIR page 4.12-8, second paragraph, is revised as follows:

> "The SMAQMD Roadway Construction Model version 5.1 (screening model) was used to estimate short-term impacts of DNA project construction south of the American River (Appendix F). The screening model only allows input for construction years 2000 through 2010, so it is not applicable to the entire project. Although the construction phases in the screening model do not exactly match the construction phasing described in Section 4.20, it was assumed that the default equipment types, number, and duration contained in the model would be representative of the project. Emissions were calculated using the following model inputs:
>
> - 25 months of construction
> - Construction start year 2010
> - Project length of 3 miles
> - Maximum 10-acres disturbed per day
> - 1,000 ft^3/day of soil imported
> - Operation of water trucks for dust control"

Draft PEIR pages 4.12-17 and 4.12-18 are revised as follows:

> **"Mitigation Measures**
>
> Mitigation measures are summarized below for construction and operation of the DNA project. ~~The Tier 4 emissions standards for offroad engines (model Year 2012) used in construction equipment will become effective during construction of the DNA project south of the American River (MOS-1). Therefore, it is not likely that construction equipment used by the contractor for the DNA project in this area would meet the Tier 4 emission standards.~~
>
> ~~However, for construction of the DNA project north of the American River, the contractor would be more likely to have access to construction equipment meeting the Tier 4 emission standards. Therefore, the construction equipment mitigation measures presented below only would apply to MOS-1. For the remainder of the DNA project, it was assumed the contractor would operate equipment with engines meeting the Tier 4 emission standards, and would implement the other relevant mitigation measures listed below for control of opacity and fugitive dust.~~"

Draft PEIR page 4.12-18, first and second bullets, are revised as follows:

> "The following mitigation measures, recommended by the SMAQMD, would mitigate the short-term construction impacts of the DNA project to a less-than-significant level (Mitigation MAQ-1):
>
> - The project shall provide a plan for approval by the lead agency and ~~to the~~ SMAQMD demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet average 20 percent NOX reduction and 45 percent particulate reduction compared to the most recent ARB fleet average at time of construction~~.~~; and the project representative shall submit

to the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

- The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and [DERA, City of Sacramento, SMAQMD, etc] shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as site inspections to determine compliance. Nothing in this section shall supersede other SMAQMD or state rules or regulations."

Draft PEIR page 4.12-19, number one under "Equipment" is revised as follows:

"~~Use ultra-low sulfur fuel (≤ 15 ppm) at an incremental cost of $0.20 to $0.50 per gallon. Locations where ultra-low sulfur fuel is available in California are available at: http://ecdiesel.com/business/locator.~~"

Draft PEIR page 4.12-19, number five under "Equipment" is revised as follows:

"Level 3 Diesel Particulate Filters will be used on all off-road diesel equipment for which the ARB has verified specific control technology. A listing of ARB verified control technologies is available on the ARB website, http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm."

Draft PEIR page 4.12-19, number one under "Administrative", is revised as follows:

~~"Receipts of ultra-low sulfur fuel purchase and equipment tuning/repair will be kept and made available upon request."~~

Section 4.14

Draft PEIR page 4.14-9, first paragraph, is revised as follows:

"Riparian vegetation would be adversely affected by direct removal of vegetation and by inhibition of tree regeneration due to shading and obstruction by the elevated guideway resulting in a potentially significant impact (Impact BIO-1). ~~A permanent maintenance right-of-way under the guideway would be kept free of vegetation,~~

~~resulting in permanent disturbance of riparian forest and willow-cottonwood scrub habitats.~~"

Draft PEIR page 4.14-15, second paragraph, is revised as follows:

"As described above, suitable nesting habitat is present within the American River Parkway, and there is a recorded Swainson's hawk nest site on the west bank of the Sacramento River near the mouth of the American River. In addition, there are numerous Swainson's hawk nesting territories within the Natomas Basin. To minimize impacts on Swainson's hawk nesting associated with construction disturbance to a less-than-significant level, the following mitigation measure will be implemented during all phases of project construction (Mitigation MBIO-3):"

Section 4.19

Draft PEIR page 4.19-2, last paragraph, is revised as follows:

"A broad floodplain terrace is located on the north side of the American River, ~~outside~~ within the American River Parkway. As shown on Figure 4.19-2, habitats in this area include dense mature riparian forest, riparian scrub, and ruderal/non-native grassland habitat. A habitat mitigation area on the north side of the American River has been established as mitigation for impacts to federally listed valley elderberry longhorn beetle habitat associated with the USACE levee improvement work along the Sacramento River. This site contains native trees and shrubs."

Section 4.20

Draft PEIR page 4.20-6, second paragraph, is revised as follows:

"Staging areas would be required for storing construction materials and staging contractor operations. The construction staging areas selected are located in areas that are primarily commercial. For the DNA project area north of the American River, it is envisioned that the areas designated as parking facilities at stations would be used for staging areas. These include the West El Camino Avenue Station, San Juan Road Station, and the ARCO Arena Station. The San Juan Road Station area is located adjacent to residential development that would need to be screened and protected from visual and lighting impacts. Beyond the ARCO Arena, two additional sites have been identified for staging: the Metro Air Park maintenance facility site, and the Airport, at the area south of Crossfield Drive ~~at the location of the old detention lagoons that have now been filled~~. The Airport site is designated in the Proposed Airport Master Plan Improvements (Long-Term) as commercial and where a future optional station could be constructed when development occurs. These sites would be occupied for 30 months of the 36-month construction period for the DNA project in this area."

Draft PEIR page 4.20-14, number one under "Equipment" is revised as follows:

"~~Ultra-low sulfur fuel (<15 ppm) will be used in diesel equipment, at an incremental cost of $0.5 to $0.20 per gallon. Locations where ultra-low sulfur fuel is available in California are available at http://ecdiesel.com/business/locator.~~"

Draft PEIR page 4.20-14, number two under "Equipment" is revised as follows:

> "Level 3 Diesel Particulate Filters will be used on all off-road diesel equipment for which the ARB has verified specific control technology. A listing of ARB verified control technologies is available on the ARB website, http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm."

Draft PEIR page 4.20-14, number one under "Administrative", is revised as follows:

> ~~"Receipts of ultra-low sulfur fuel purchase and equipment tuning/repair will be kept and made available upon request."~~

Section 4.21

Draft PEIR page 4.21-4, Table 4.21-1, is revised as follows:

Parkland Resources			
Section 4(f) of the U.S. Department of Transportation Act of 1966	Construction of the new bridge would bisect the American River Parkway and directly affect Discovery Park.	Federal Transit Administration	Submit Section 4(f) evaluation to Department of the Interior and agencies with jurisdiction over Section 4(f) property. *Timeframe: TBD based on negotiations with parks interests regarding satisfactory mitigation*
Section 6(f) of the Land and Water Conservation Act of 1965	Construction of the new bridge would bisect the American River Parkway and directly affect Discovery Park.	National Park Service; California State Department of Parks and Recreation	Secretary of Interior must approve any conversion of property acquired or developed with assistance under this act. *Timeframe: TBD based on negotiations with parks interests regarding satisfactory mitigation*

Section 4.22

Draft PEIR page 4.22-3, first bullet, is revised as follows:

> **"Sacramento International Airport**. ~~An update to t~~The Airport's Master Plan ~~is currently underway~~ was completed and approved by the Board of Supervisors in 2004. The accompanying EIR was certified by the Board of Supervisors in 2007. In addition, a more detailed Terminal Modernization Program to replace existing Terminal B, including working with RT on the Preliminary Engineering of the on-Airport portion of the light rail alignment. ~~It is expected that medium-term construction projects in the vicinity of planned DNA improvements would likely include expansion of airport terminals, although several other small-scale facility improvements are also likely (Febbo, 2002).~~"

4.2.7 Chapter 5

Draft PEIR page 5-19, Figure 5.4-2, is revised.

Refer to page 5-19 of Chapter5.0 of the Attachment for revised Figure 5.4-2

Draft PEIR page 5-35, is revised as follows:

"5.5 COMPARISON OF DNA PROJECT AND ALTERNATIVES

Table 5.5-1 compares the environmental consequences associated with the DNA project and the No-Project, TSM, I-5, Hybrid, and BRT alternatives."

Refer to page 5-36 of Chapter 5.0 of the Attachment for Table 5.5-1

Draft PEIR page 5-35, is revised as follows:

"5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of a proposed project and the project alternatives, Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such selection be disclosed. In general, the environmentally superior alternative is the one that would be expected to cause the fewest adverse impacts. However, Section 15126.6(e)(2) of the State CEQA Guidelines states that in the case the No-Project Alternative is the environmentally superior alternative, an environmentally superior development alternative must be identified.

The determination of an environmentally superior alternative is based on the consideration of how the alternative fulfills the project objectives and how the alternative either reduces significant, unavoidable impacts or substantially reduces the impacts to the surrounding environment. In consideration of these factors, the I-5 Alternative is selected as the environmentally superior alternative. The I-5 Alternative avoids many of the adverse environmental effects that result from construction and operation of a light rail system in a residential area. Construction and operational impacts such as increases in traffic, noise, and dust would still occur, but would occur farther away from sensitive receptors when compared to the proposed DNA project. All of these impacts would be avoided by adopting the No-Action Alternative. RT is not proposing to select the environmentally superior alternative because avoiding residential areas makes the project less feasible. Projections in Chapter 3.0 indicate that a substantial number of transit patrons will walk to the planned stations along the Truxel alignment, and access to these potential customers is necessary for project success."

4.2.8 Chapter 9

Draft PEIR page 9-3 is revised as follows:

> ~~"Febbo, John. 2002. Personal communication between John Febbo, Senior Planner, Sacramento County Department of Airports, and Matt Franck, CH2M HILL, September 24."~~

Draft PEIR page 9-6 is revised as follows:

> "Sacramento County. 2003b. Personal communication between George Quinday, Park Maintenance Supervisor, American River Parkway, Sacramento County ~~Department of~~ Regional Parks~~, Recreation, and Open Space,~~ and Matt Franck, CH2M HILL. January 24."

4.2.9 Appendices

Appendix F

Appendix F: Roadway Construction Model (version 5.1) Run