



February 2, 2018

Tim Hawkins, Environmental Coordinator
Sacramento County, Office of Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814

Subject: COMMENTS ON THE REVISED NOTICE OF PREPARATION FOR THE PREPARATION OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE NATOMAS NORTH PRECINCT SPECIFIC PLAN (PLNP2014-00172).

Dear Mr. Hawkins,

On December 27, 2017, the City of Sacramento Community Development Department received the Revised Notice of Preparation (NOP) for the Natomas North Precinct Specific Plan (NNPSP). The Revised NOP reflects changes and refinements to the project plan that have occurred since the County previously released an NOP for the project on April 28, 2016.

The proposed NNPSP would include development of approximately 5,675.6 acres north of Elkhorn Blvd. and east of Hwy 99 – adding 23,515 dwelling units (58,671 population) and 14,347 jobs into the unincorporated Natomas area immediately proximate to the City's North Natomas Community Plan Area. The project plan includes development consisting of residential, neighborhood mixed-use, neighborhood commercial, community mixed-use, office mixed-use and health & hospitality mixed-use. The plan includes 2,288.1 acres of parks and open space.

The City of Sacramento previously provided comments regarding the proposed development the Natomas North Precinct area (December 11, 2014 and May 31, 2016). The following comments presented herein are intended to supplement and update those previous comments:

Memorandum of Understanding between City & County

On December 10, 2002, the City & County entered into a Memorandum of Understanding (MOU) (City Resolution 2002-830 and County Resolution 2002-1566) regarding Principles of Land Use and Revenue Sharing for the Natomas Area. Does the County agree the MOU remains in effect, and, if so, how will the County address the seeming inconsistencies between the parties' agreements in the MOU and the proposal for development embodied in the North precinct proposal?

Economic

Locating commercial, hospital/hospitality near City boundary may cause secondary physical and economic impacts within the City. The City requests that the County address these issues.

Growth Inducement

The proposed North precinct project would bring development to an area that has not been included in the long-range plans approved by the County or the City. In addition to analyzing the effects of the project itself, the EIR should carefully evaluate its potential growth inducing effects. For example, the project would require at least the extension of urban utilities to the site, which lacks sufficient water, wastewater, storm water and energy infrastructure. California Environmental Quality Act (CEQA) recognizes that the extension of urban infrastructure to a site or area may lead to future development in nearby areas that, as a result of the infrastructure extension, may now feasibly extend and connect, thus leading to additional new development. This should be analyzed in the Environmental Impact Report (EIR).

Development of the North Precinct as proposed would involve not just extension of infrastructure, but expansion of existing facilities, and the impacts of such expansion efforts must also be evaluated. As with extension of infrastructure, the expansion may also lead to additional downstream development, and should be analyzed as growth inducing effects.

The Draft EIR should address growth inducement and premature development associated with the NNPSF project and any conflicts with growth consistency of the project with the Sacramento Area Council of Governments (SACOG) 2016 Metropolitan Transportation/Sustainable Communities Strategy (MTP/SCS).

Habitat Conservation Plan

1. While the County is not a party to the Natomas Basin Habitat Conservation Plan (NBHCP), activities that could affect the success of the conservation strategy established in the NBHCP should be considered in the EIR. In the Natomas Basin, any future development not covered by an existing Habitat Conservation Plan (HCP) must obtain take authorization under the Endangered Species Act (ESA). The HCP's purpose is to promote biological conservation in conjunction with economic and urban development within the permit area. How and when does the County intend to meet this requirement? The City of Sacramento requests that the EIR include an analysis of:
 - a. Location and quality of proposed mitigation sites (including those within the Natomas Basin), including an analysis of the effect of market competition and

price increases resulting from the North precinct project and its effect on the HCP conservation strategy;

- b. Effect of the North Precinct project on existing and future water supplies that would affect the reliability of water supply and price of water used for maintenance of Giant Garter Snake (and other aquatic species) habitat;
- c. Hydrological connectivity to existing preserves in the Basin;
- d. Effects of a reduction in the inventory (supply) of land available for mitigation, while also increasing the demand for mitigation land, drive up the price of mitigation for the existing permit holders.; and
- e. Appropriate mitigation ratio assuming development of the plan, which would appear to substantially change the assumptions that supported a 0.5:1 ration for the Metro Air Park HCP and the NBHCP.

Agricultural, Prime Farmland and Open Space

The Sacramento County General Plan land use designation for the project area is Agricultural Cropland. This designation represents agricultural lands most suitable for intensive agricultural activities, including row crops, tree crops, irrigated grains, and dairies. One single-family dwelling unit per 40 acres is also considered suitable in this area. The NNPSF does not appear to include any preservation of the +5,675.6-acres as Agricultural Cropland. As such, the NNPSF appears inconsistent with local, regional and state goals that facilitate and encourage in-fill development as an alternative to the development of agricultural lands.

Transportation

1. As discussed with County staff regarding the study scenarios for the City's Panhandle project, we request that the Natomas North Precinct traffic analysis provide analysis for a super cumulative scenario (Post 2036). The Post 2036 Cumulative scenario shall include all major projects approved/ anticipated such as Metro Air Park, Placer Vineyards, Regional University, Sierra Vista, Sutter Pointe, Greenbriar, etc. The City would like to see analysis for roadway (LOS and ADT) in addition to intersection analysis for the intersections along Elkhorn Boulevard.
2. For the Study Area, the City requests that the traffic study assess impacts to City of Sacramento roadways and intersections. At a minimum, impacts to City streets shall include the following locations:

Intersections:

- Elkhorn Blvd/SR 99 Interchange (including on/off-ramp intersections)

- Elkhorn Boulevard/E Commerce Way
- Elkhorn Boulevard/Northborough Drive
- Elkhorn Boulevard/Natomas Boulevard
- Elkhorn Boulevard/Sageview Drive
- Elkhorn Boulevard/ National Drive
- Elkhorn Boulevard/various intersections proposed with Natomas North Precinct Specific Plan, and with the approved Greenbriar project
- E Commerce Way/ Meister Way

Roadways:

- Elkhorn Blvd sections (SR 99 – eastern City limits (E. Levee Road))
 - Natomas Blvd (Elkhorn Blvd – Del Paso Blvd)
 - E. Commerce Way (Elkhorn Blvd – Del Paso Blvd)
 - Del Paso Road (SR 99 – Natomas Blvd)
 - Natomas Boulevard (Elkhorn – Del Paso)
3. If roadways and intersections are impacted, widening of roadways and intersections may not be feasible since the City’s roadways are not designed to carry this volume of traffic and widening of roadways is in most cases not consistent with the City of Sacramento 2035 General Plan. We anticipate seeing mitigation measures other than roadway widening being implemented to reduce traffic affecting the City roadway system.
 4. Since the NNPS project site is extensive, phasing should be considered. Roadway improvements and infrastructure should be defined according to each phase.
 5. The SR 99/Elkhorn Boulevard interchange reconstruction shall be required as part of the proposed project. Please refer to the 1995 Caltrans Cooperative Agreement with the City and County of Sacramento for more details about this requirement.
 6. It will be very important that development of the project would be implemented in such a way that the jobs-housing balance would remain constant throughout the development of this project. The jobs-housing balance is a very important factor that will be affecting the amount of additional traffic generated from this project on City roadways.
 7. As previously discussed, it is the City’s understanding that the County will include a VMT analysis as part of the traffic analysis.
 8. Any proposed roadway or intersection improvements within the City of Sacramento jurisdiction should be reviewed and agreed upon with the City of Sacramento Department of Public Works.

9. The City requests that the scope of work for the traffic study be shared with the City of Sacramento for review and comment. Additionally, the City requests to be included in the project development team to discuss the impact of the project on City of Sacramento streets and proposed mitigation measures and improvements

Sewer System

The City of Sacramento believes the impacts from additional sewer flows to the Sacramento Regional County Sewer Interceptor needs to be analyzed to ensure there is adequate sewer capacity in the interceptor to accommodate the build-out of the existing Natomas area and the Natomas Vision area (including the NNPSF pending development plans).

Drainage - Long term maintenance & funding:

1. The Project should ensure that long term maintenance mechanisms and associated funding are established for the drainage facilities including flood control basins, water quality treatment, hydro-modification basins, and low impact development measures.

Flood Control and Flood Plain Management

1. How will flood control and flood plain management be addressed on and off-site? Remaining Levee improvements & phased development? This development may put people and infrastructure at risk of flooding. Will the County have any milestones for allowing development as the remaining levee work (by the Corps) is completed?

Storm Drainage

1. What is the plan for-storm drainage on and off-site? There is no capacity in the current North Natomas Drainage System for storm drainage from this or other developments.

Water Supply

1. The County's NOP identifies that water service to the NNPSF area may come from one or more service providers. How would the NNPSF development area be provided with water service without SCWA relying upon purchases from Natomas Central Mutual Water Co. and/or City of Sacramento?
2. Backup water supply for the Plan Area is identified per the County's NOP as water from the City and/or Sac Suburban Water District Water source. What is the availability of this

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is backup supply presumption based on? The City's Utilities Department has informed the County that the City is not able to provide water to this area. In compliance with State law, new development projects must show the existence of water supply that is sufficient for near-term and long-term water needs.

3. If groundwater is used, would it lower groundwater levels in City wells? How would it work within the existing groundwater management plan and the water accounting framework?

Fire Protection

1. New development will result in an increase in service demand for Fire and Emergency Medical Services (EMS). Currently the City provides 100% of the fire protection and EMS demand to the unincorporated portion of Natomas. How will Metro Fire mitigate the service demand impacts and the City's ability to maintain current levels of service?
2. If LAFCo approves a shift in fire service sphere of influence in the unincorporated portion of Natomas, how does Sacramento Metropolitan Fire District (Metro Fire) intend to serve the area – including station locations, timing of stations coming on line, etc.
3. Has Metro Fire considered, as per LAFCo requirements, the fiscal impacts on the City? How does Metro Fire propose to mitigate the fiscal impacts?

Parks & Recreation

1. How will development comply with the County's Rio Linda/Elverta Recreation and Park District's (RLRPD) neighborhood/community service level goals?
2. When will parks be constructed?
3. What types of parks are anticipated (neighborhood / community / regional / open space areas) and amenities will be included?
4. What funding mechanisms will be in place to finance ongoing maintenance?

Schools

The NOP identifies that the NNPSF area is located within two school districts, the Twin Rivers Unified School District (RUSD) and the Elverta Joint Elementary School District (EJESD). EJESD provides elementary and middle school facilities only. The development plan would include various Public/Quasi-Public (P/QP) uses such as schools, civic uses, and public utility use to serve the needs of residents (projected population of 58,671). The NOP notes that potentially six K through 8 schools are sited in the Plan Area within the designated P/QP areas. What high school would serve the NNPSF area? What schools would serve the residents that

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may be located outside of the NNPS development plan area including those that may serve the area while the six K through 8 schools are built?

Library Services

1. What is the infrastructure staging for library facilities?
2. Until library facilities are constructed and operational in the Vision Area, what service impacts will be carried by the City and how will these services be funded?

Thank you for the opportunity to comment. If you have follow-up questions or seek clarifications on any of the above issues, please contact Cheryle Hodge at chodge@cityofsacramento.org or 808-5971.

Sincerely,



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