

# **Appendix A**

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Notice of Preparation and  
Scoping Comments

# Notice of Preparation

## NOTICE OF PREPARATION

**Date:** December 2, 2019

**To:** Responsible Agencies, Interested Parties, and Organizations

**Subject:** Notice of Preparation of an Environmental Impact Report for the Resources Building Renovation Project, Sacramento, California

**Lead Agency:** State of California Department of General Services

**Contact:** Stephanie Coleman, Senior Environmental Planner  
Department of General Services, Environmental Services Section  
Mailing Address: P.O. Box 989052, West Sacramento, CA 95798  
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**Comment Period:** December 2, 2019 to December 31, 2019

## PURPOSE OF NOTICE

The California Department of General Services (DGS) is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the proposed Resources Building Renovation Project (proposed project), located in downtown Sacramento.

Pursuant to provisions of the California Environmental Quality Act (CEQA), DGS has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

## PROJECT LOCATION

The Resources Building, a 17-story building within the downtown/Capitol area, is located at 1416 9th Street, in downtown Sacramento. The Resources Building is located southwest of the California State Capitol and south of the Capitol Mall corridor. As shown on Figure 1, the project site encompasses approximately three quarters of the block bounded by N Street on the north, 9th Street on the east, O Street on the south, and 8th Street on the west. The building covers most of the southern half of the block, south of Neighbors Alley. The northeastern portion of the block, which is occupied by trees and bicycle lockers, is included in the project site as is Neighbors Alley; however, the northwestern portion, which supports the Leland Stanford Mansion State Historic Park, is not part of the project and are not included in the project site.

## PROJECT DESCRIPTION

The Resources Building was constructed in 1964 and has been continuously occupied for nearly 50 years. The building serves as the headquarters for the California Natural Resources Agency and includes staff from the departments of Fish and Wildlife, Water Resources, Parks and Recreation, and Forestry and Fire Protection. The Resources Building is necessary to fulfill office space needs in the Sacramento Region. DGS has identified it as an important functioning government building because of its gross square footage, occupant density, centralized location, and access to transit. However, the building, which is considered a "high rise" by the building code, has received minimal repair and updating since its construction. In 2015, DGS prepared facility condition assessments

(FCAs) for the DGS-controlled state-owned office buildings in Sacramento. The results of the FCAs, and subsequent ranking of the buildings, became the basis of a Ten-Year Sequencing Plan for building renovation. The Resources Building was ranked first for buildings in Sacramento with the highest need for replacement or renovation.

Employee capacity of the Resources Building is approximately 2,400. Renovation would not substantially modify the number of employees housed there, but efficiencies gained through renovation could conservatively accommodate an additional 100 employees (an increase of 4 percent), or a total of 2,500. The current occupants would be moved to the new Resources Building (the P Street Office Building, which is under construction on the block bounded by 7th and 8th Streets and O and P Streets) along with additional California Natural Resources Agency departments. After renovation, the building would be occupied by employees from the Employment Development Division (EDD). The project supports DGS' strategic mission to provide the highest level of customer service in fulfilling state agencies' facility and real property needs by ultimately providing new or renovated office space to replace existing deficient office space. The project would also be consistent with statutory directives and requirements used to guide state office space planning and development (including water conservation and energy reduction measures) as referenced in DGS's 2016 Five-Year Infrastructure Plan.

As identified in DGS' *2014 Resources Building Renovation Study Update* (updating a 2001 study), there are serious seismic deficiencies and absence of modern high-rise fire, life, and safety elements. The goal of this project is to protect the health and safety of the Resources Building occupants and to extend the useful life and viability of the building by correcting the fire/life safety deficiencies and completely upgrading all infrastructure systems.

The compulsory code-required improvements include: seismic upgrade, installation of a building-wide fire sprinkler system, reconstruction of three 17-story exit stair towers, and replacement of asbestos-containing fireproofing. Extensive demolition is required to replace the antiquated mechanical, plumbing, electrical, security, and telecommunication systems. The project would include removal of architectural barriers in accordance with the Americans with Disabilities Act (ADA) and the California Building Code (CBC). Replacement of the building envelope (roof, windows, and exterior pre-cast concrete panels) is necessary to correct seismic deficiencies, alleviate water intrusion, and to increase energy efficiency. Lead- and asbestos-containing materials are present throughout the existing building and require abatement.

To complete these improvements, the project would involve a comprehensive tear-down, leaving the building's steel frame, and then reinforcement/rebuild. The reconstruction would address the necessary improvements while matching the building's current mass and height. The project would make the building safe while honoring the building's historic qualities. The project goal is to achieve Zero Net Energy and Leadership in Energy and Environmental Design (LEED) Silver certification.

## RESPONSIBLE AGENCIES

For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency that have discretionary approval power over the project (CEQA Guidelines Section 15381). Discretionary approval power may include such actions as issuance of a permit, authorization, or easement needed to complete some aspect of the proposed project. It is anticipated that approval from various City of Sacramento departments will be required to complete the project. Where city approval may constitute a discretionary decision, such as potential approvals related to utility connections, it is expected that the City will use the EIR for the Resources Building Renovation Project to support these decisions. Other agencies whose approval may be required for the project include, but may not be limited to: State Historic Preservation Officer, Sacramento Metropolitan Air Quality Management District, and Sacramento Municipal Utility District.

## POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will describe the direct and indirect environmental impacts of construction and operation of the Resources Building Renovation Project. It is anticipated that the EIR will address potential impacts associated with the proposed

project in the following issue areas. In addition, the EIR will evaluate alternatives, growth-inducing impacts, and cumulative impacts.

## **Land Use**

The Resources Building is located in downtown Sacramento; renovations and subsequent operation of the existing building would not alter land use and would not develop any physical impediments that could physically divide this community. Although the project site is located in the City of Sacramento, the site is owned by and under the jurisdiction of the State; therefore, the project is not subject to City land use plans or zoning. Nonetheless, in addition to evaluating consistency with the State's Capitol Area Plan, the EIR will discuss the project's consistency with relevant City of Sacramento planning policies.

## **Population, Employment, and Housing**

The Resources Building, which is approximately 657,000 gross square feet, is included in the DGS Ten-Year Sequencing Plan, and is necessary to fulfill office space needs in the Sacramento Region. The project involves renovation of the building, through which space efficiencies to accommodate approximately 100 additional employees may be realized. This four percent increase in employees would not substantially affect local/regional population, employment, or housing opportunities. Further information/analysis will be provided as part of the EIR.

## **Transportation and Circulation**

The project would result in a minor increase in the total amount of office space and employees (approximately 100 additional employees) in downtown Sacramento, which could cause a commensurate increase in traffic on local roadways and demand for transit and other modes of travel. The EIR will evaluate the project's construction-period and operational AM and PM peak hour trip generation and how the project may affect delays and level of service (LOS) at key intersections. Vehicle miles traveled (VMT) and access to the project site will be assessed, and the project's construction and operational impacts on the roadway, bicycle, pedestrian, and transit systems will be evaluated.

## **Utilities and Infrastructure**

Although the proposed increase of 100 building occupants represents only a four percent increase, the EIR will evaluate the project-related impacts to infrastructure and capacity of water supply and treatment, sewer and wastewater treatment, drainage and stormwater, electricity, and natural gas. Wastewater treatment and disposal for the proposed project would be provided by the Sacramento Regional County Sanitation District's (SRCSD's) Sacramento Regional Wastewater Treatment Plant (SRWTP). Wastewater generated in the project area is conveyed to the SRWTP by the City's combined stormwater runoff and sanitary sewer system (CSS); the potential change in wastewater flows to the CSS and the SRWTP will be evaluated. The City of Sacramento is the water supplier for the project site; any project-related increase in water demand will be evaluated in the EIR to determine if there is sufficient water supply. Cooling for the renovated building would continue to be supplied by chilled water delivered via underground pipes from the State's Central Plant at 7th and P Streets. However, the building would have on-site electric heating and would no longer be served steam from the Central Plant. If the project requires any new or modified utility infrastructure, the environmental effects of that utility work will be evaluated in the EIR.

## **Air Quality**

The project site is located within the Sacramento Valley Air Basin (SVAB), within the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD), which administers local, state, and federal air quality management programs for Sacramento County. Construction equipment would emit exhaust, including ozone precursors, particulate matter, and air toxics. Due to the planned energy efficiency, the availability of transit access, the urban location, and based on SMAQMD air quality screening criteria, the project would comply with SMAQMD operational emissions levels; therefore, the preparation of an Air Quality Mitigation Plan would not be required. However, total regional operational emissions of criteria pollutants and precursors will be assessed based on project-specific information (i.e., traffic study, energy usage, building location) and compared to applicable SMAQMD significance thresholds for operational emissions.

## Greenhouse Gas Emissions and Climate Change

As noted above with respect to air quality, although the project is proposed to be highly energy efficient, construction activities and subsequent operation of the project would result in the generation of greenhouse gas (GHG) emissions. Therefore, the EIR will quantify GHG emissions from construction and operational (i.e., building energy, vehicle trips) activities and evaluate the change in GHG emissions in comparison to existing project site conditions.

## Energy

This section will evaluate whether implementation of the project would result in the inefficient, wasteful, or unnecessary consumption of energy during construction or operation of the project. The building runs on electricity and would continue to do so after renovation. No natural gas would be used for operation of the renovated building, only cooling would be provided by the State's Central Plant, and DGS has a contract with SMUD for renewable energy. Emissions associated with electricity use for the building, and for cooling provided by the Central Plant chillers, would be offset by 100-percent renewable energy purchase through the State's contract with SMUD.

## Noise

Implementing the proposed project may result in short-term and long-term increases in ambient noise levels through demolition, renovation, and construction activities. The EIR will include a description of the existing noise environment, including noise sources and sensitive receptors in the project area. The EIR will then assess potential short-term (i.e., construction) and long-term (i.e., operational) noise impacts to sensitive receptors. Operational noise changes may be generated by proposed stationary sources such as emergency backup generators, parking, and vehicle trips.

## Geology and Soils

No known faults or Alquist-Priolo special studies zones are located in or adjacent to the City of Sacramento; therefore, the proposed project site would not be subject to fault rupture. The project design will be required to comply with applicable seismic and other building codes. The proposed project would involve a demolition of much of the building, maintaining the steel frame, and then reconstructing the building. The project would involve limited ground disturbance, as limited work is proposed to the building's foundation. Because the project would adhere to current building codes, and because the seismic risk in Sacramento is low, significant impacts related to geologic and soils hazards are not anticipated.

## Hydrology and Water Quality

The project site is currently developed with impervious surfaces (e.g., the building and sidewalks); therefore, the project would not result in a substantial increase in ground coverage such that interference with groundwater recharge would occur. Because the project would reconstruct an existing building, would involve limited ground disturbance, and would continue to connect to the City's stormwater system, significant impacts related to hydrology and water quality are not anticipated.

## Hazardous Materials and Public Health

The EIR will identify known hazardous materials or sources of potential hazards (e.g., asbestos, lead, or underground storage tanks) at the project site, which could be released during building renovation. The project would not involve activities such as industrial or manufacturing uses that could generate hazardous emissions. However, the office building would continue to use and store small quantities of hazardous materials, such as cleaning materials, commonly used at office and commercial locations. The routine transport, use, and disposal of such materials would be limited. Federal, state, and local laws regulate every aspect of hazardous materials transport, use, and storage. These regulations are designed to avoid significant hazards to the public and environment; however, potential hazardous materials and public health impacts will be analyzed further in the EIR. The project site is not within a wildfire hazard zone or an urban-wildland interface, as the building is located in downtown Sacramento.

## Cultural and Tribal Cultural Resources

Construction of the Resources Building was completed in 1964. The building is eligible for the National Register of Historic Places and the California Register of Historic Resources for its association with the Capitol Master Plan and within the context of Modern architecture and the International Style in Sacramento. The elements of the building that contribute to its historical significance will be described and the potential for the proposed project to impact the historic features will be assessed. Consultation will be conducted with the State Historic Preservation Officer per Public Resources Code Section 5024/5024.5. In addition, outreach to the Native American community and local historical groups will be conducted to solicit information on tribal cultural resources and any additional known cultural resources concerns or issues. There is the potential for buried prehistoric and historic-era resources within the project area, as there is in much of downtown Sacramento. Due to project-related ground disturbance, potential impacts to these resources during project construction will be considered in the EIR.

## Biological Resources

Sensitive biological resources are those protected by federal, state, or local resource conservation agencies and organizations. The project site is developed and is unlikely to support sensitive habitats or habitat for any special-status species. The EIR will disclose the common biological resources in the area, including vegetation and wildlife and, if identified, the EIR will evaluate the project's potential to impact common and sensitive biological resources.

## Public Services

The potential for an increase in office space and associated employees downtown will be considered in evaluating the project's potential impacts to fire protection services, law enforcement services, and parks and recreation facilities. Because the project does not propose removal or construction of housing, it is not anticipated to have an impact on schools. The Sacramento City Fire Department (SCFD) provides fire protection and emergency medical services to the project area, including State-owned office buildings. Police protection to the project site is provided by the California Highway Patrol (CHP) Office of Capitol Protection (OCP). The project would be designed in compliance with current building codes and fire protection regulations, and it is anticipated that existing police services would continue to be adequate to continue to serve the building. Because the project involves an existing building that would be retained/renovated, potentially significant impacts to public services are not anticipated.

## Aesthetics/Light and Glare

Although the project would involve almost a complete tear down and rebuild of the Resources Building, the project would maintain the building framing, the building massing, and the building height. However, the project will involve visual changes during construction, including changes to the building and the presence of construction equipment, crew, and activities. The renovated building would have new building exteriors, windows, landscaping, and lighting. Therefore, additional information will be provided on aesthetics, light, and glare, project effects related to these issues will be evaluated in the EIR.

## Cumulative Impacts

Implementation of the project could result in significant impacts; when taken together with the effects of past projects, other current projects, and probable future projects, the project's contribution to the overall cumulative effect of all these activities could be considerable. Cumulative impacts and the project's contribution to those impacts will be evaluated in the EIR.

## Alternatives

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the project's objectives, and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative.

## PUBLIC REVIEW PERIOD

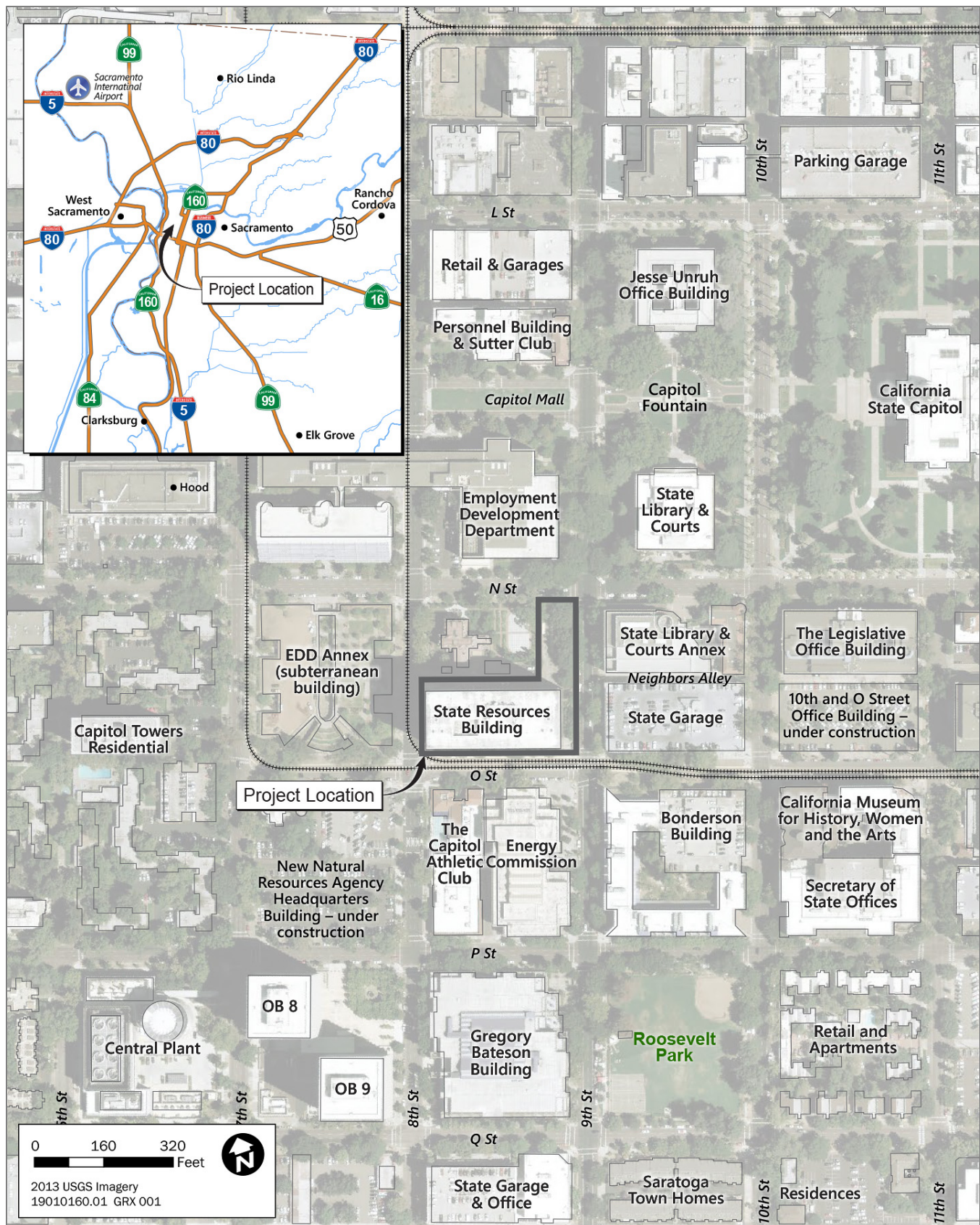
This Notice of Preparation is being circulated for public review and comment for a period of 30 days beginning December 2, 2019. An open house format scoping meeting will be held from 4:30 PM to 6:30 PM on Tuesday, December 17, 2019 at the Tsakopoulos Library Galleria, located at 828 I Street Sacramento, CA 95814, in the East Room. Agencies and individuals may attend the scoping meeting at any time to obtain information on the project, ask questions of project team members, and provide comments. A brief presentation on the proposed project and the CEQA process will be given. Written comments will be accepted by DGS through 5:00 PM on December 31, 2019. Comments must be delivered or mailed to Ms. Stephanie Coleman, at the address listed above.

Copies of the Notice of Preparation may be reviewed at the following locations:

- ▶ Sacramento Central Library at 828 I Street during library hours;
- ▶ Department of General Services, Environmental Services Section between 8:00 AM and 4:30 PM; or
- ▶ Request a copy by email at [environmental@dgs.ca.gov](mailto:environmental@dgs.ca.gov).
- ▶ <http://bit.ly/DGSCEQA>

Your views and comments on how the project may affect the environment are welcomed. Please contact Ms. Stephanie Coleman if you have any questions about the environmental review process for the Resources Building Renovation Project.





Source: Sacramento County 2006. Adapted by Ascent Environmental in 2019.

**Figure 1** Project Location

# Scoping Comments



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**Lead Agency:** State of California Department of General Services

**Contact:** Stephanie Coleman, Senior Environmental Planner  
Department of General Services, Environmental Services Section  
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## PROJECT DESCRIPTION

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project in the following issue areas. In addition, the EIR will evaluate alternatives, growth-inducing impacts, and cumulative impacts.

## Land Use

The Resources Building is located in downtown Sacramento; renovations and subsequent operation of the existing building would not alter land use and would not develop any physical impediments that could physically divide this community. Although the project site is located in the City of Sacramento, the site is owned by and under the jurisdiction of the State; therefore, the project is not subject to City land use plans or zoning. Nonetheless, in addition to evaluating consistency with the State's Capitol Area Plan, the EIR will discuss the project's consistency with relevant City of Sacramento planning policies.

## Population, Employment, and Housing

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## Transportation and Circulation

The project would result in a minor increase in the total amount of office space and employees (approximately 100 additional employees) in downtown Sacramento, which could cause a commensurate increase in traffic on local roadways and demand for transit and other modes of travel. The EIR will evaluate the project's construction-period and operational AM and PM peak hour trip generation and how the project may affect delays and level of service (LOS) at key intersections. Vehicle miles traveled (VMT) and access to the project site will be assessed, and the project's construction and operational impacts on the roadway, bicycle, pedestrian, and transit systems will be evaluated.

## Utilities and Infrastructure

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## Air Quality

The project is located within the Sacramento Valley Air Basin (SVAB), within the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD), which administers local, state, and federal air quality management in Sacramento County. Construction equipment would emit exhaust, including ozone precursors, and air toxics. Due to the planned energy efficiency, the availability of transit access, and the project's compliance with SMAQMD air quality screening criteria, the project would comply with SMAQMD operational emissions levels; therefore, the preparation of an Air Quality Mitigation Plan would not be required. However, total regional operational emissions of criteria pollutants and precursors will be assessed based on project-specific information (i.e., traffic study, energy usage, building location) and compared to applicable SMAQMD significance thresholds for operational emissions.

Combined Sewer Development Fees shall apply for any increase in use of existing building areas.



## Greenhouse Gas Emissions and Climate Change

As noted above with respect to air quality, although the project is proposed to be highly energy efficient, construction activities and subsequent operation of the project would result in the generation of greenhouse gas (GHG) emissions. Therefore, the EIR will quantify GHG emissions from construction and operational (i.e., building energy, vehicle trips) activities and evaluate the change in GHG emissions in comparison to existing project site conditions.

## Energy

This section will evaluate whether implementation of the project would result in the inefficient, wasteful, or unnecessary consumption of energy during construction or operation of the project. The building runs on electricity and would continue to do so after renovation. No natural gas would be used for operation of the renovated building, only cooling would be provided by the State's Central Plant, and DGS has a contract with SMUD for renewable energy. Emissions associated with electricity use for the building, and for cooling provided by the Central Plant chillers, would be offset by 100-percent renewable energy purchase through the State's contract with SMUD.

## Noise

Implementing the proposed project may result in short-term and long-term increases in ambient noise levels through demolition, renovation, and construction activities. The EIR will include a description of the existing noise environment, including noise sources and sensitive receptors in the project area. The EIR will then assess potential short-term (i.e., construction) and long-term (i.e., operational) noise impacts to sensitive receptors. Operational noise changes may be generated by proposed stationary sources such as emergency backup generators, parking, and vehicle trips.

## Geology and Soils

No known faults or Alquist-Priolo special studies zones are located in or adjacent to the City of Sacramento; therefore, the proposed project site would not be subject to fault rupture. The project design will be required to comply with applicable seismic and other building codes. The proposed project would involve a demolition of much of the building, maintaining the steel frame, and then reconstructing the building. The project would involve limited ground disturbance, as limited work is proposed to the building's foundation. Because the project would adhere to current building codes, and because the seismic risk in Sacramento is low, significant impacts related to geologic and soils hazards are not anticipated.

## Hydrology and Water Quality

The project site is currently developed with impervious surfaces (e.g., the building and sidewalks); therefore, the project would not result in a substantial increase in ground coverage such that interference with groundwater recharge would occur. Because the project would reconstruct an existing building, would involve limited ground disturbance, and would continue to connect to the City's stormwater system, significant impacts related to hydrology and water quality are not anticipated.

## Hazardous Materials and Public Health

The EIR will identify known hazardous materials or sources of potential hazards (e.g., asbestos, lead, or underground storage tanks) at the project site, which could be released during building renovation. The project would not involve activities such as industrial or manufacturing uses that could generate hazardous emissions. However, the office building would continue to use and store small quantities of hazardous materials, such as cleaning materials, commonly used at office and commercial locations. The routine transport, use, and disposal of such materials would be limited. Federal, state, and local laws regulate every aspect of hazardous materials transport, use, and storage. These regulations are designed to avoid significant hazards to the public and environment; however, potential hazardous materials and public health impacts will be analyzed further in the EIR. The project site is not within a wildfire hazard zone or an urban-wildland interface, as the building is located in downtown Sacramento.



## Cultural and Tribal Cultural Resources

Construction of the Resources Building was completed in 1964. The building is eligible for the National Register of Historic Places and the California Register of Historic Resources for its association with the Capitol Master Plan and within the context of Modern architecture and the International Style in Sacramento. The elements of the building that contribute to its historical significance will be described and the potential for the proposed project to impact the historic features will be assessed. Consultation will be conducted with the State Historic Preservation Officer per Public Resources Code Section 5024/5024.5. In addition, outreach to the Native American community and local historical groups will be conducted to solicit information on tribal cultural resources and any additional known cultural resources concerns or issues. There is the potential for buried prehistoric and historic-era resources within the project area, as there is in much of downtown Sacramento. Due to project-related ground disturbance, potential impacts to these resources during project construction will be considered in the EIR.

## Biological Resources

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## Public Services

The potential for an increase in office space and associated employees downtown will be considered in evaluating the project's potential impacts to fire protection services, law enforcement services, and parks and recreation facilities. Because the project does not propose removal or construction of housing, it is not anticipated to have an impact on schools. The Sacramento City Fire Department (SCFD) provides fire protection and emergency medical services to the project area, including State-owned office buildings. Police protection to the project site is provided by the California Highway Patrol (CHP) Office of Capitol Protection (OCP). The project would be designed in compliance with current building codes and fire protection regulations, and it is anticipated that existing police services would continue to be adequate to continue to serve the building. Because the project involves an existing building that would be retained/renovated, potentially significant impacts to public services are not anticipated.

## Aesthetics/Light and Glare

Although the project would involve almost a complete tear down and rebuild of the Resources Building, the project would maintain the building framing, the building massing, and the building height. However, the project will involve visual changes during construction, including changes to the building and the presence of construction equipment, crew, and activities. The renovated building would have new building exteriors, windows, landscaping, and lighting. Therefore, additional information will be provided on aesthetics, light, and glare, project effects related to these issues will be evaluated in the EIR.

## Cumulative Impacts

Implementation of the project could result in significant impacts; when taken together with the effects of past projects, other current projects, and probable future projects, the project's contribution to the overall cumulative effect of all these activities could be considerable. Cumulative impacts and the project's contribution to those impacts will be evaluated in the EIR.

## Alternatives

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the project's objectives, and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative.

## PUBLIC REVIEW PERIOD

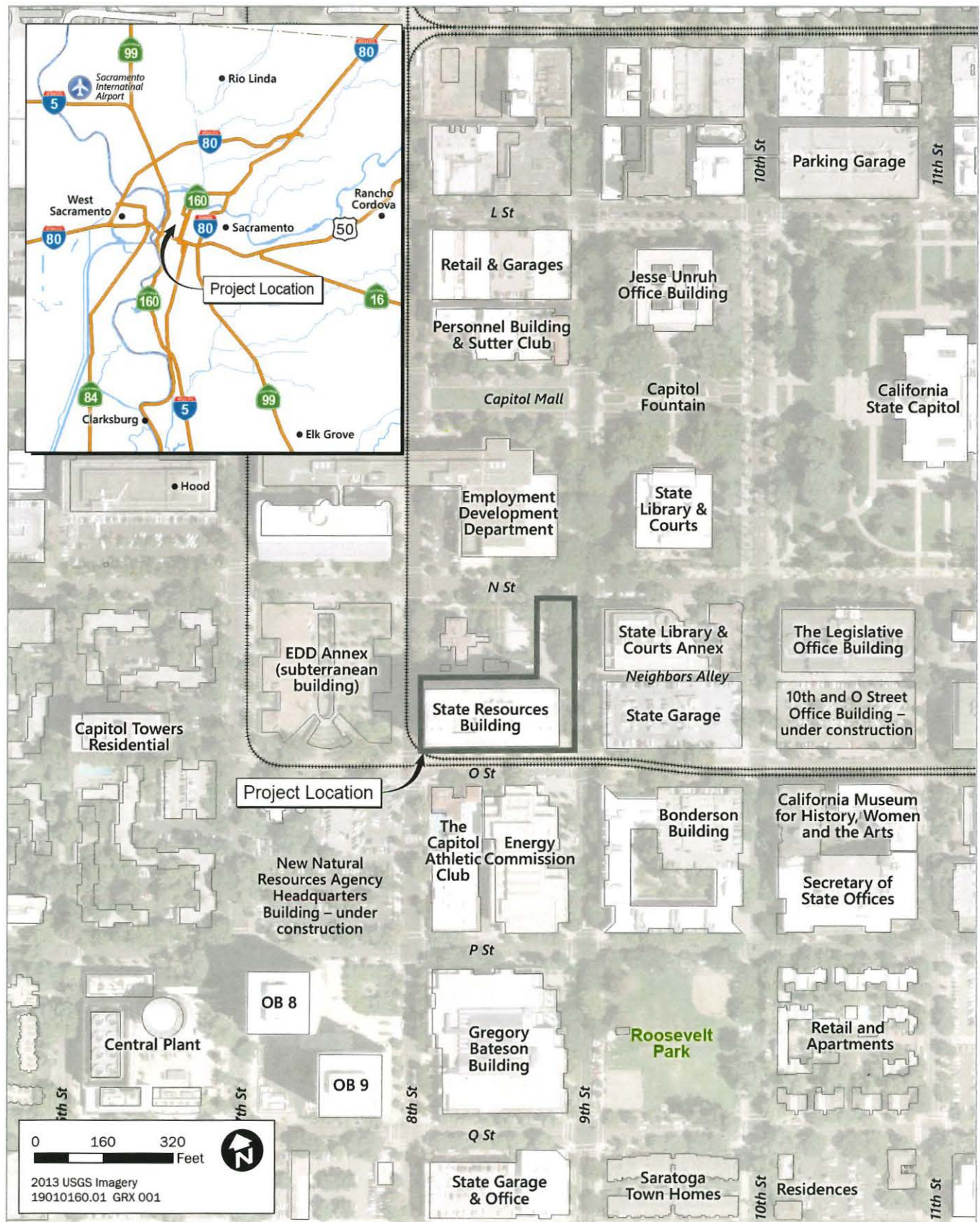
This Notice of Preparation is being circulated for public review and comment for a period of 30 days beginning December 2, 2019. An open house format scoping meeting will be held from 4:30 PM to 6:30 PM on Tuesday, December 17, 2019 at the Tsakopoulos Library Galleria, located at 828 I Street Sacramento, CA 95814, in the East Room. Agencies and individuals may attend the scoping meeting at any time to obtain information on the project, ask questions of project team members, and provide comments. A brief presentation on the proposed project and the CEQA process will be given. Written comments will be accepted by DGS through 5:00 PM on December 31, 2019. Comments must be delivered or mailed to Ms. Stephanie Coleman, at the address listed above.

Copies of the Notice of Preparation may be reviewed at the following locations:

- ▶ Sacramento Central Library at 828 I Street during library hours;
- ▶ Department of General Services, Environmental Services Section between 8:00 AM and 4:30 PM; or
- ▶ Request a copy by email at [environmental@dgs.ca.gov](mailto:environmental@dgs.ca.gov).
- ▶ <http://bit.ly/DGSCEQA>

Your views and comments on how the project may affect the environment are welcomed. Please contact Ms. Stephanie Coleman if you have any questions about the environmental review process for the Resources Building Renovation Project.





Source: Sacramento County 2006. Adapted by Ascent Environmental in 2019.

Figure 1 Project Location

**From:** Brianna Moland <BMoland@cityofsacramento.org>  
**Sent:** Friday, December 06, 2019 3:16 PM  
**To:** Environmental@DGS <Environmental@dgs.ca.gov>; Scott Johnson <SRJohnson@cityofsacramento.org>  
**Cc:** Dana Lynn Repan <DRepan@cityofsacramento.org>  
**Subject:** RE: CA DGS - Resource Building (1416 9th St) Renovation Project CEQA NOP of EIR

**CAUTION:** This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

Hi All,

The Department of Youth, Parks, and Community Enrichment will be reviewing this EIR for impacts to the closest City park – Roosevelt Park. Since this project is adding additional office space and 100 new employees, traffic control measures near the park may be needed.

Thanks,

Brianna Moland  
Assistant Planner, Park Planning and Development Services  
Department of Youth, Parks, and Community Enrichment  
**City of Sacramento**  
**915 I Street,**  
**Sacramento, CA 95814**  
[bmoland@cityofsacramento.org](mailto:bmoland@cityofsacramento.org)  
(916) 808-6188

---

**From:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>  
**Sent:** Friday, December 6, 2019 8:31 AM  
**To:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>  
**Cc:** Tom Buford <[TBuford@cityofsacramento.org](mailto:TBuford@cityofsacramento.org)>; Karlo Felix <[KFelix@cityofsacramento.org](mailto:KFelix@cityofsacramento.org)>  
**Subject:** CA DGS - Resource Building (1416 9th St) Renovation Project CEQA NOP of EIR

Attached is the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Resources Building Renovation Project issued by the State of California Department of General Services. The Resources Building is located at 1426 Ninth Street, Sacramento, CA.

The City is identified as a potential Responsible Agency for potential discretionary actions that may occur as part of any permit approvals.

The period for submitting comments to CA DGS ([environmental@dgs.ca.gov](mailto:environmental@dgs.ca.gov)) on the scope and content of information to be included in the EIR is December 2, 2019 and ends December 31, 2019.

An open house format scoping meeting will be held from 4:30 PM to 6:30 PM on Tuesday, December 17, 2019 at the Tsakopoulos Library Galleria, located at 828 I Street in the East Room.

Thank you,

Scott Johnson  
City of Sacramento  
Community Development Department  
Environmental Planning Services  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
(916) 808-5842  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

**From:** Rick Leonard <rleonard@Capitalac.com>  
**Sent:** Monday, December 09, 2019 2:28 PM  
**To:** Environmental@DGS <Environmental@dgs.ca.gov>  
**Subject:** notice of preparation EIR for the Resources Building

**CAUTION:** This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

Good afternoon:

In reading the report I noticed that it is stated under population & transportation that it is only taking into account the increase of potential growth of 100 additional employees. I believe the New Resource building in its calculation only accounted for an additional 1,000 employees because 2,400 employees would transfer from the current resource building.

If this is correct the renovation would need to address the entire 2,400 employees that it would accommodate.

Regards

*Rick Leonard*  
*Executive Director*  
*The Capital Athletic Club*  
*1515 8<sup>th</sup> St.*  
*Sacramento Ca. 95814*  
*Phone 916 442 3927*  
*Fax 916 442 3826*  
*e-mail: [rleonard@capitalac.com](mailto:rleonard@capitalac.com)*



**From:** King Tunson <ktunson@sfd.cityofsacramento.org>

**Sent:** Tuesday, December 10, 2019 3:01 PM

**To:** Environmental@DGS <Environmental@dgs.ca.gov>

**Subject:** CA DGS - Resource Building (1416 9th St) Renovation Project CEQA NOP of EIR

**CAUTION:** This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

To whom it may concern,

Please provide a Traffic Management Plan (TMP) if construction will cause road closures. Document should be sent to Deputy Chief Chad Augustin.

King Tunson  
Entitlement Plan Review Supervisor  
Sacramento Fire Department  
5770 Freeport Blvd, Ste 200  
Sacramento, CA 95822  
Office (916) 808-1358  
Fax (916) 808-1677  
[ktunson@sfd.cityofsacramento.org](mailto:ktunson@sfd.cityofsacramento.org)



## Central Valley Regional Water Quality Control Board

17 December 2019

Stephanie Coleman  
State of California Department of General Services  
P.O. Box 989052  
West Sacramento, CA 95798

CERTIFIED MAIL  
7019 0700 0002 0111 6173

2019 DEC 23 P 2:22  
REAL ESTATE SERVICES  
PROPERTY & DEVELOPMENT

### COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, RESOURCES BUILDING RENOVATION PROJECT, SCH#2019120011, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 2 December 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Resources Building Renovation Project, located in Yolo County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

#### I. Regulatory Setting

##### Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office



of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

#### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

#### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

#### **Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

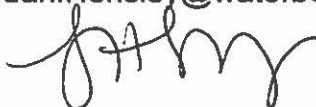
For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

If you have questions regarding these comments, please contact me at (916) 464-4812 or [Jordan.Hensley@waterboards.ca.gov](mailto:Jordan.Hensley@waterboards.ca.gov).



Jordan Hensley  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento (via email)



REAL ESTATE SERVICES  
PROJECT & DEVELOPMENT

2019 DEC 26 P 3:47

December 20, 2019

Stephanie Coleman, Senior Project Manager  
Department of General Services, Environmental Services Section  
Mailing Address: P.O. Box 989052, West Sacramento, CA 95798  
Street Address: 707 3<sup>rd</sup> Street, MS-509, West Sacramento, CA 95605  
Phone: 916-376-1602

**RE: Sac Metro Air District comments on the Notice of Preparation of an Environmental Impact Report for the Resources Building Renovation Project, Sacramento, California**

Dear Ms. Coleman:

Thank you for providing the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Resources Building Renovation Project, (project) to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. This project consists of a comprehensive tear-down, reinforcement and rebuild of the State Resources Building, a 17-story building at 1416 9th Street in downtown Sacramento. Sac Metro Air District staff (District Staff) comments on the project NOP and design recommendations follow.

*California Environmental Quality Act (CEQA) Comments:*

**Construction (Short-term) Emissions:** If the EIR concludes that the project is likely to exceed the Sac Metro Air District mass emission threshold for construction of 85 lbs/day of NOX; District staff recommends the project comply with the Construction-Generated Criteria Air Pollutant and Precursor Emissions policies from the *Guide to Air Quality Assessment in Sacramento County*<sup>1</sup>.

**Operational Emissions:** District staff note that the project is not anticipated to exceed the Sac Metro Air District threshold of significance for operational emissions. However, the Sac Metro Air District Operational Screening Table<sup>2</sup> recommends a project level analysis for Government Office Buildings of 106,000 square feet or more in size based on CalEEMod Land Use analysis. The EIR should include an analysis of operation emissions based upon the project-specific traffic study. If the analysis of the project's operational emissions show a probability to exceed the Sac Metro Air District's operational threshold<sup>3</sup> of 65 lbs/day of NOX or ROG emissions, District staff recommend that the EIR include an Air Quality Mitigation Plan (AQMP) that includes measures to reduce operational emissions by 15% or more.

<sup>1</sup> The Sac Metro Air District's *Guide to Air Quality Assessment in Sacramento County* provides methods to analyze air quality impacts from plans and projects. Chapter three of the guide covers Construction-Generated Criteria Air Pollutant and Precursor Emissions and is available at:

<http://www.airquality.org/LandUseTransportation/Documents/Ch3ConstructionFINAL5-2017.pdf>

<sup>2</sup> The Sac Metro Air District Operational Screening table is available at:

<http://www.airquality.org/LandUseTransportation/Documents/Ch4+Ch6OperationalScreening4-2018.pdf>

<sup>3</sup> The Sac Metro Air District Threshold of Significance Table is available at:

<http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf>



Should the project develop an AQMP, District staff request consultation to review the document for technical adequacy prior to inclusion in the final EIR.

**Greenhouse Gas Emissions and Climate Change:** In addition to a quantification of the anticipated construction and operational emissions associated with the project, the EIR should include a threshold of significance supported by substantial evidence. If the project is determined to be significant for Greenhouse Gas Emissions and Climate Change the EIR should include all feasible mitigation.

The Sac Metro Air District recommends that the discussion of the causes of global climate change reflect the strong scientific consensus on climate change. The background is that starting in the 19<sup>th</sup> century humans began changing the composition of the atmosphere. Global temperatures did not start rising immediately with the release of greenhouse gas emissions from coal combustion in the 19<sup>th</sup> century, because early on the concentrations were still too low to be the dominating factor in global temperature trends. During this time, changes in global averages fluctuated from year to year, due to random, natural and regional variability in climate trends, but the Industrial Revolution is generally recognized as the critical tipping point at which humans began to alter our atmosphere. In the last several decades, the elevated concentrations of GHG emissions in the atmosphere have been the dominant signal in the atmosphere, leading to the rapid warming in global average temperatures.

*Design Recommendations:*

**Bicycle Parking:** District staff recommends the inclusion of short-term bicycle parking for visitors and long-term bicycle storage for staff. Short-term bicycle parking should be adjacent to public entrances to the building and feature racks that allow for the storage of personal bicycles and BikeShare bicycles such as JUMP bikes. Long-term bicycle parking should be in a secure, ground-level, multi-bicycle room with racks that can accommodate a variety of bicycle shapes and sizes, and provides electrical service to allow for the charging of e-bicycles. Short-term & long term parking facilities should be of sufficient quantity to ensure that bicycle parking related to the project does not overflow onto existing facilities or informal bicycle parking locations (street furniture, street signs, etc.).

**Tree Shading:** District staff encourages DGS to work with the City of Sacramento and Regional transit to identify feasible locations for new shade trees and install new trees as replacement for tree canopy lost due to the project's construction.

All projects are subject to SMAQMD rules at the time of construction. Specific rules that may relate to construction activities are attached. A complete listing of current rules is available at [www.airquality.org](http://www.airquality.org) or by calling 916-874-4800.

Please contact me at 916-874-2694 or [jhurley@airquality.org](mailto:jhurley@airquality.org) if you have any questions regarding these comments and recommendations.

Sincerely,



Joseph James Hurley  
Associate Air Quality Planner/Analyst  
Land Use & CEQA section-Communication, Land Use & Mobile Sources Division

[ihurley@airquality.org](mailto:ihurley@airquality.org)  
916.874.2694

Cc: Paul Philley, SMAQMD

## ATTACHMENT

### **SMAQMD Rules & Regulations Statement (revised 1/2017)**

*The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at [www.airquality.org](http://www.airquality.org) or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

**Rule 201: General Permit Requirements.** Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a SMAQMD permit or a California Air Resources Board portable equipment registration (PERP) (see Other Regulations below).

**Rule 402: Nuisance.** The developer or contractor is required to prevent dust or any emissions from onsite activities from causing injury, nuisance, or annoyance to the public.

**Rule 403: Fugitive Dust.** The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

**Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour.** The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

**Rule 417: Wood Burning Appliances.** This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

**Rule 442: Architectural Coatings.** The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

**Rule 453: Cutback and Emulsified Asphalt Paving Materials.** This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

**Rule 460: Adhesives and Sealants.** The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

**Rule 902: Asbestos.** The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

**Other Regulations (California Code of Regulations (CCR))**

**17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos:** The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas "Moderately Likely to Contain Asbestos" within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

**13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program:** The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

**13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling:** Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.

*Transportation Division*

*City Hall  
915 I Street, 2<sup>nd</sup> Floor  
Sacramento, CA 95814-2604  
916-808-5307*

December 30, 2019

Stephanie Coleman  
Senior Project Manager  
Department of General Services  
Environmental Services Section  
P.O. Box 989052  
West Sacramento, CA 95605  
Phone: 916-376-1602  
Email: [environmental@dgs.ca.gov](mailto:environmental@dgs.ca.gov)

**SUBJECT: Notice of Preparation (NOP) of an Environmental Impact Report for the  
Resources Building Renovation Project, Sacramento, California**

Dear Mrs. Coleman:

Thank you for including the City of Sacramento in the environmental review process for the project referenced above. The proposed project would involve the renovation of the existing 17-story Resources Building located at 1416 9<sup>th</sup> Street, in downtown Sacramento. The project site is bounded by N Street on the north, 9<sup>th</sup> Street on the east, O Street on the south, and 8<sup>th</sup> Street on the west. Neighbors Alley and the northeastern portion of the block is included in the project, although the northwestern portion of the block is not part of this project. The renovation does not substantially increase the workable space for employees; however, renovation would lead to employee housing efficiencies that would allow the building to accommodate an additional 100 employees. This would yield a 4% increase in employees from 2,400 to 2,500 employees.

The City of Sacramento has the following comments which we would like to be addressed in the Draft EIR for this project:

1. The City of Sacramento's Central City Specific Plan integrates a number of planned transportation improvements and programs to further enhance the downtown grid. In the vicinity of the proposed project, the future infrastructure improvements include but are not limited to:

- 8<sup>th</sup> Street lane reduction from 3 lanes to 2 lanes adjacent to the project site;
- N Street conversion from an eastbound 1-Way vehicle travel to 2-Way vehicle travel;
- Pedestrian network improvements within the vicinity of the project site;
- 9<sup>th</sup> Street protected bike lane adjacent to the project site as part of the Downtown Mobility Project;
- Class II Enhanced Buffered Bike Lane along 10 Street and 15<sup>th</sup> Street, Class II Bike Lane along N Street adjacent to the project site, the existing Class II Bike Lane bisecting Capitol Park;
- Transit investments along 8<sup>th</sup> and 9<sup>th</sup> Street within the vicinity of the project site.

All this planning effort needs to be taken into consideration with the development of the Resources Building Renovation Project.

2. The City of Sacramento 2035 General Plan Mobility Element, Policy M 1.2.2, allows LOS F within the Core Area provided that provisions are made to improve the overall system, promote non-vehicular transportation, and/or implement vehicle trip reduction measures as part of a development project (see page 2-168 2035 City of Sacramento General Plan). Therefore, an evaluation of the project impacts to the transportation system should not focus only on LOS at intersections, it should address the overall impacts on the circulation system within the project vicinity to improve the overall system.
3. According to SB743, VMT analysis shall be required for all development projects, please follow the latest guidelines provided for this effort and plan on methods to address reducing the VMT of this project if found higher than the threshold
4. In addition to intersection level of service analysis please include a detailed analysis of pedestrian, bicycle, and transit system impacts and identify appropriate mitigation measures that includes but is not limited to pedestrian sidewalks, crossings, adequate bicycle parking and access, transit stop enhancements, sufficient driveway throat depth length, and other appropriate transportation system improvements. In the analysis, incorporate the planned transportation improvements and programs referenced in comment #1.
5. The proposed project is required to comply with Sacramento City Code Section 12.20.020 to prepare a traffic control plan for any construction activities that may obstruct vehicular or pedestrian traffic on city streets. The plan is subject to review and approval of the City of Sacramento director of Department of Public Works. The City Code Section 12.20.030 outlines the minimum requirements for information that must be provided in the traffic control plan. The project site is adjacent to a light rail station which is a pedestrian generating use; thus, the City recommends the project divert



shared-use traffic in lieu of closing sidewalks and bike lanes during construction activities. The City recommends maintaining shared-use facilities during construction to accommodate multiple modes of transportation and include these facilities in the required traffic control plan. The traffic control plan is subject to review and approval of the City of Sacramento director of Department of Public Works.

6. Pursuant to City Code Section 17.700.060, a Transportation System Management Plan is required. The Transportation System Management Plan shall be subject to review and approval by the City, Department of Public Works.
7. The City of Sacramento will be looking forward to see what improvements to the pedestrian, bicycle and transit system would be provided to improve all modes of transportation within the project vicinity given the close proximity to the light rail system along O Street.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development and we would like to be included on early review of the proposed project site plan.

If you have any questions regarding these comments, please contact Alex Switzgable at (916)-808-7808 or by email at [JSwitzgable@cityofsacramento.org](mailto:JSwitzgable@cityofsacramento.org).

Sincerely,

Pelle Clarke, Senior Engineer  
City of Sacramento  
Department of Public Works, Traffic Engineering