

**California State University, Sacramento**  
**South Campus Student Housing Mitigated Negative Declaration & Initial Study**  
**Response to Comments**

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**COMMENTS AND RESPONSES TO COMMENTS**

The California State University, Sacramento (CSU Sacramento) campus circulated an Initial Study/Proposed Mitigated Negative Declaration (IS/Proposed MND) for public review on August 24, 2018. The IS/Proposed MND provided review for the South Campus Student Housing Project ("Project"). Per Section 15073 of the California Environmental Quality Act Guidelines, comments were accepted on the circulated document for a 30-day period ending September 25, 2018. CSU Sacramento received a total of seven responses, one of which served as an addendum to an original response. Per Section 15074(b) of CEQA Guidelines, the comments received must be considered prior to project approval. While CEQA does not require responses to comments, responses may be provided at the discretion of the lead agency and CSU Sacramento has prepared responses to comments received.

Comments during the public review period were received from:

Letter A: Richard Scherer

Letter B (and amendment): Dan Kopp

Letter C: Central Valley Regional Water Quality Board, Stephanie Tadlock

Letter D: City of Sacramento Department of Utilities, Dalia Fadl

Letter E: Sacramento Metropolitan Utilities Department, Nicole Goi

Letter F: City of Sacramento Department of Public Works, Pelle Clarke

Letter G: State of California Governor's Office of Planning and Research, Scott Morgan

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## Comment Letter A

**From:** Scherer, Richard@DGS [<mailto:Richard.Scherer@dgs.ca.gov>]

**Sent:** Thursday, September 13, 2018 12:04 PM

**To:** Takahashi, Victor K <[vtakahas@csus.edu](mailto:vtakahas@csus.edu)>

**Subject:** Dan McAuliffe Memorial Ball Parks

Victor –

- A-1 [ Too many times the needs of the few are put before the needs of the many. The destruction of the ball fields that have served many generations of local Sacramento residents, for the needs of non-residents who have a short 4 year residence – is a prime example of this action.
- A-2 [ Building apartment complexes on vacant ground or a former golf driving range is one thing, but to destroy history is another.
- A-3 [ Let me remind you and the committee of the following description when CBS television reviewed the BEST facilities in the Sacramento area:
- A-4 [ Built in the late '90s as local officials saw a need to provide a couple of quality fields for Sacramento's burgeoning population, the Dan McAuliffe Memorial Ball Parks were built. With lights that surpass AAA minor league standards, the lights stretch a good 320 feet down both left and right field lines and 410 feet to center field. More than one generation of Sacramento's own residents have played ball there, and many of their kids now do too. In total, there are three
- A-5 [ fields for you to choose from.

How do you plan to replace the fields and the memories from the past and yet to be made.

It is an embarrassment to know CSUS is planning this action.

Thank you

**Richard Scherer**

*Associate Real Estate Officer - Southern California Unit*

**Real Estate Services Division**

Department of General Services

707 Third Street, 5<sup>th</sup> Floor, MS-5050

West Sacramento, CA 95605

**Phone** 916.375.4145 **Cell** 916.204.3654

**Email** [Richard.Scherer@dgs.ca.gov](mailto:Richard.Scherer@dgs.ca.gov)

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## Comment Letter B

South Campus Student Housing MND-IS Comments:

- B-1 **Aesthetics: c)** As a long-time resident, I have enjoyed the visual character of the ballfields and quality of habitat it provides for resident breeding birds such as Black Phoebes and American Robins and as foraging habitat for Canada Geese. The removal of this installation will substantially degrade the visual character of an open park-like facility and replace it with asphalt and concrete and a constant, instead of intermediate (game time), occupation during the school year. This should be at least checked as Less Than Significant Impact with Mitigation Incorporated or Potentially Significant Impact.
- B-2 **Population and Housing: a)** The first sentence in the reply is doublespeak. How can constructing an in-fill project that would create new residence halls for up to 1,100 students not be inducing substantial population growth in that area, when that parcel has never contained housing, save maybe prior to construction of HWY 50 in the late 1960's? I prefer students seek housing in the city than be concentrated in one giant mess of an instant mini city. I have been considering moving from my nearby residence of 17 years due to the plague of homelessness, but the University is beginning to weigh in heavily on the right time to leave. The recent Crossings population induction, which demanded a new intersection on Folsom that will have me avoiding that corridor and the businesses it houses, and now this proposal combine as definite factors for Mandatory Findings of Significance b).
- B-3
- B-4 **Transportation/Traffic: a,b)** There is no way to guarantee additional student housing would reduce commuter vehicular trips to campus. Am I to believe the proposed residents of this project would be forced to walk, ride a bike or ride a campus bus to the university? This prediction of reduced commuter vehicular trips is bogus at best and misleading at the worst; with additional student housing it can only be certain it will increase by 1,100 the number of vehicles accessing that parcel for months at a time compared to the 50 or so that do so intermittently for ball games at the current facility. How is the second sentence backed up, with any real numbers? And what does it even mean? The IS does nothing but admit traffic congestion will be exacerbated by the proposed project, namely at Howe Avenue and College Town where there are already accidents waiting to happen with unmetered cross traffic. The portion of East University Dr where the current vehicle access to the ballfields is located would become an unruly entrance and exit back-up, forcing folks to alter their many year's long routes just to accommodate transitory citizens. That is near completion with the Crossings intersection on Folsom and adds another combining negative impact for Mandatory Findings of Significance b).
- B-5
- B-6

Dan Kopp

8295 La Riviera Dr.

Sacramento, CA 95826

## Comment Letter B Amendment

**From:** Dan Kopp [[mailto:rey\\_ality@hotmail.com](mailto:rey_ality@hotmail.com)]

**Sent:** Tuesday, September 18, 2018 3:57 PM

**To:** Takahashi, Victor K <[vtakahas@csus.edu](mailto:vtakahas@csus.edu)>

**Subject:** Re: South Campus Student Housing MND-IS comments

Victor,

B-7 [ Please let me know if need to submit an additional comment, or if I have a comment file that can describe what a "smooth mile away" is.

Thank you,

Dan Kopp  
8295 La Riviera Dr.

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**From:** Dan Kopp <[rey\\_ality@hotmail.com](mailto:rey_ality@hotmail.com)>

**Sent:** Saturday, September 15, 2018 3:40 PM

**To:** Takahashi, Victor K

**Subject:** Re: South Campus Student Housing MND-IS comments

B-8 [ Yes, and please add this article: <https://www.kcra.com/article/parking-shortage-frustrates-sacramento-renters-at-new-complex/23189940>  
in my comment file, showcasing the increase in vehicle traffic with not only residents but visitors. This is testimony to the University's knowing misinterpretation of the deleterious effects of a misguided master plan that doesn't care much for negative effects on long-term neighbors, but instead favors the University and its transitory student population.

Please let me know Victor is this doesn't suffice, much like the analysis for these projects, and I will gladly write another comment for the IS-MND

Thanks,

Dan Kopp  
8295 La Riviera Dr.

## Comment Letter C



### Central Valley Regional Water Quality Control Board

17 September 2018

Victor Takahashi  
The Trustees of the California State University and  
California State University, Sacramento  
6000 J Street  
Sacramento, CA 95819-6002

CERTIFIED MAIL  
7014 3490 0001 3008 3807

#### COMMENTS TO REQUEST FOR REVIEW FOR THE NEGATIVE DECLARATION, STUDENT HOUSING EAST PROJECT, SCH# 2018082052, SACRAMENTO COUNTY

C-1

Pursuant to the State Clearinghouse's 24 August 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Negative Declaration* for the Student Housing East Project, located in Sacramento 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

C-2

##### 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,

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)



C-2

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 Policy is available on page IV-15.01 at:

[http://www.waterboards.ca.gov/centralvalleywater\\_issues/basin\\_plans/sacsjr.pdf](http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf)

In part it states:

C-3

*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**

C-4

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan



C-4

(SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

C-5

**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.

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).

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water

<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.

drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.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:

C-5

C-5

[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)

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

C-6

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/for\\_growers/apply\\_coalition\\_group/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growers/apply_coalition_group/index.shtml) or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

C-7

**Low or Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

C-7

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf)

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf)

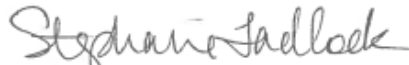
C-8

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit3.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml)

If you have questions regarding these comments, please contact me at (916) 464-4644 or [Stephanie.Tadlock@waterboards.ca.gov](mailto:Stephanie.Tadlock@waterboards.ca.gov).



Stephanie Tadlock  
Senior Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

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## Comment Letter D

**From:** Dalia Fadl [<mailto:DFadl@cityofsacramento.org>]

**Sent:** Monday, September 17, 2018 1:26 PM

**To:** Takahashi, Victor K <[vtakahas@csus.edu](mailto:vtakahas@csus.edu)>

**Cc:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>

**Subject:** FW: CEQA Notice: CSUS - South Campus Student Housing (Student Housing East)

**Importance:** High

Good Afternoon Victor,

I reviewed the **Initial Study** for the South Campus Student Housing dated August 2018 and have the following comments:

- D-1 {
- The **Hydrology and Water Quality** discussion does not mention the incorporation of post construction stormwater quality measures. The City of Sacramento post construction stormwater quality requirements include:
    - Source Control Measures (waste management area design, vehicle wash area design, other measures as applicable)
    - Treatment Control Measures (bioretention planters, vegetated swales, infiltration measures)
    - Low Impact Development Measures (bioretention planters, infiltration measures, pervious pavement)
- Please ensure that the project design incorporates all of these required post construction measures. Please refer to the **2018 Stormwater Quality Design Manual for the Sacramento Area** (<http://www.beriverfriendly.net/newdevelopment/stormwaterqualitydesignmanual/>) for more information on the selection and design of these measures.
- D-2 {
- The City of Sacramento requires a maintenance agreement to be executed for all proposed onsite post construction stormwater quality measures. The maintenance agreement shall be signed and submitted to the City of Sacramento upon approval of the improvement plans. Please refer to the attached maintenance agreement template for more information.

Feel free to contact me if you have any questions or comments. Thanks for the opportunity to review.

Thanks-

Dalia Fadl, P.E.

Senior Engineer

City of Sacramento

Department of Utilities

916-808-1449

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## Comment Letter E

Powering forward. Together.



### *Sent Via E-Mail*

September 20, 2018

Victor Takahashi  
California State University, Sacramento  
6000 J Street  
Sacramento, CA 95819  
[takahashiv@csus.edu](mailto:takahashiv@csus.edu)

Subject: Student Housing East / 2018082052 / Negative Declaration

Dear Mr. Takahashi:

E-1

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Mitigated Negative Declaration (MND) for the Student Housing East Project (Project, SCH 2018082052). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project MND will acknowledge any Project impacts related to the following:

E-2

- Overhead and or underground transmission and distribution line easements. Please view the following links on [smud.org](http://smud.org) for more information regarding transmission encroachment:
- <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
- <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>

E-3

- Utility line routing
- Relocation or removal of existing SMUD facilities on or adjacent to the project area.
- Existing easements on or adjacent to the subject property for SMUD infrastructure.

E-4

- Electrical load needs/requirements

E-5

- Energy Efficiency
- Climate Change

E-6

- Cumulative impacts related to the need for increased electrical delivery

SMUD CSC | 6301 S Street | P.O. Box 15830 | Sacramento, CA 95852-0830 | 1.888.742.7683 | [smud.org](http://smud.org)



SMUD would like to offer the following project specific comments:

- E-7 {
- The MND does not acknowledge the need for electrical infrastructure. This project would require a pad mounted transformer that will service this project; therefore, there are existing SMUD distribution (12kV) and sub-transmission (69kV) facilities within the Student Housing East project area that will need to be maintained if areas are developed/redeveloped
- E-8 {
- Additional distribution facilities will be required in vacant areas when developed potentially along the Folsom Blvd corridor or College Town Drive and State University Drive corridors. These areas would need to be evaluated for potential biological impacts.
- E-9 {
- No additional distribution substations are anticipated
  - No additional sub-transmission routes are anticipated
- E-10 {
- More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:
- SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.
- E-11 {
- Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NEG. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera, at [rob.ferrera@smud.org](mailto:rob.ferrera@smud.org) or 916.732.6676.

Sincerely,



Nicole Goi  
Regional & Local Government Affairs  
Sacramento Municipal Utility District  
6301 S Street, Mail Stop A313  
Sacramento, CA 95817  
[Nicole.goi@smud.org](mailto:Nicole.goi@smud.org)

Cc: Rob Ferrera

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## Comment Letter F



Transportation Division

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

September 25, 2018

Victor Takahashi  
Director  
Facilities Planning and Construction Services  
6000 J Street  
Sacramento, CA 95819-6002  
Email: [evironmental@dgs.ca.gov](mailto:evironmental@dgs.ca.gov)

**SUBJECT: California State University Sacramento (CSUS) – Mitigated Negative Declaration for the South Campus Student Housing at CSUS**

Dear Mr. Takahashi:

F-1

The City of Sacramento appreciates the opportunity to review and comment on the Mitigated Negative Declaration for the South Campus Student Housing at CSUS (August 2018). The new student housing facilities would provide up to 1,100 beds in a mix of 4-bedroom, 2-bedroom, and studio apartment units as well as support spaces such as lounges, multipurpose rooms etc.

As CSUS may be aware, the parcel immediately to the east of the South Campus Housing project, currently occupied with a parking lot and low-rise office building, may be the site of a second student housing project. Please note that the proposed northbound project driveway at this signal should be designed to allow future access to future redevelopment of this parcel.

F-2

The City of Sacramento Department of Public Works provided comments on CSUS Campus Master Plan 2015 Draft Environmental Impact Report (SCH# 2014102021) on March 12, 2015. Many concerns expressed in the above referenced comment letter are still valid, particularly, the comments listed in the bullet points #3 and #6 of the letter:

3. The City has extensive experience dealing with traffic and traffic signals in and around CSUS campus. The City has made many field observations and has regularly monitored these locations through CCTV count stations, and traffic signal controllers from the City's Traffic Operation Center. The traffic study provided in the DEIR for the Campus Master Plan indicates LOS higher (better) than what the City has observed. Vehicular queuing commonly occurs from State University Drive / College Town, west on Folsom Blvd and then south to 65th / Hwy 50.

F-2  
Cont'd

In addition, queuing occurs from State University Drive / College Town east on College Town to Hornet Drive to Folsom Blvd / Bicentennial Way. In addition, there are significant queues that occur at the Hwy 50 to Hornet off-ramp. The City believes the LOS reported in the traffic study does not reflect the actual LOS at these intersections.

The City has observed that a significant amount of the queuing occurs on City streets due to poor operation and inadequate lane capacity at State University Drive/ College Town. It is possible that the LOS reported by the traffic modeling software is better due to the traffic signals being starved. This condition occurs when queue is so significant that vehicles arriving at the back of the queue do not reach the intersection in one cycle

As a result of the existing conditions and knowing that the outcome of the traffic model used in the Campus Master Plan DEIR does not reflect the existing conditions, we are requesting that the traffic analysis revised to better represent the existing conditions. For example traffic simulation at congested intersection provide more accurate outcome of the traffic model and could be utilized in these analysis

6. Adding more student housing on the Campus will increase the pedestrian and bicycle activity on City facilities and will require improvements to the intersections adjacent to the project site. The City is willing to work with Sacramento State University to identify the necessary improvements to the transportation facilities nearby University Campus. Some potential improvements may include widening northbound approach of State University Drive at College Town intersection, relocation of bus stops to change pedestrian crossings, westbound approach right turn channelization, installation of ITS elements, and others. An agreement between the City and CSUS regarding the operation and maintenance of this signal would ensure efficiency of the transportation system operation in the proximity to CSUS.

The response to comments section of the FEIR to comment 3 (2-3 in FEIR) included the statement "...the queuing problem is short-lived; 15 to 20 minutes during the peak of the peak hour and much of the queuing occurs on campus streets rather than City Streets...." The response to comment 6 (2-6 in FEIR) noted how on campus student housing is consistent with many City, County and Campus Master Plan Goals.

The City continues to monitor intersections around CSUS' campus from its Traffic Operations Center. Monitoring indicates that significant vehicular queuing continues to occur at several adjacent intersections due to poor operation and inadequate lane capacity. One of them, as noted in comments on the Campus Master Plan in 2015, is State University Drive and College Town Drive intersection. Adding the project vehicular trips generated by the proposed student housing and increased number of pedestrians will cause more delay and queuing.

Our observations show the queuing problem is not short lived and routinely occurs throughout the entire morning peak hour. Furthermore, the intent of comment 6 was to highlight some of the infrastructure improvements that would be required from increased pedestrian and bicycle activity, such as widening the northbound approach of State University Drive at College Town Drive.

F-2  
Cont'd

The northbound direction on State University Drive routinely queues back from the State University Drive and College Town intersection back to Folsom Boulevard. Furthermore, even providing 60 seconds of continuous northbound green at the State University Drive and College Town intersection is not enough time to clear the morning queue. The continuing design issue at this intersection is that the one northbound lane from which lefts, throughs, and right turns movements are allowed is not adequate.

F-3

Accordingly, City of Sacramento does not consider the proposed mitigation measure TRA-1 as sufficient to address the increased vehicular volumes and pedestrian activity at State University Drive and College Town Drive intersection. Widening of the northbound approach at this intersection to two lanes and installing ITS elements are imperative to improve the operation of this intersection. Two continuous northbound travel lanes are needed on State University Drive between Folsom Boulevard and College Town Drive.

City requests the mitigation measure TRA-1 to be modified as follows:

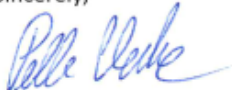
Widen the northbound approach at the State University Drive and College Town Drive intersection to two lanes and install ITS elements to improve the operation of this intersection. Install two continuous northbound travel lanes on State University Drive between Folsom Boulevard and College Town Drive.

F-4

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 me at (916) 808-8930 or by email at [pclarke@cityofsacramento.org](mailto:pclarke@cityofsacramento.org)

Sincerely,



Pelle Clarke  
Senior Engineer  
City of Sacramento

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## Comment Letter G



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

September 25, 2018

Victor Takahashi  
California State University, Sacramento  
6000 J Street  
Sacramento, CA 95819

Subject: Student Housing East  
SCH#: 2018082052

Dear Victor Takahashi:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 24, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

G-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
1-916-322-2318 FAX 1-916-558-3184 [www.opr.ca.gov](http://www.opr.ca.gov)

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**California State University, Sacramento**  
**South Campus Student Housing Mitigated Negative Declaration & Initial Study, Dated August 24, 2018**  
**Response to Comments**

<b>Letter</b>	<b>Commentator</b>	<b>Comment</b>	<b>Response</b>
A	Richard Scherer	A-1 Too many times the needs of the few are put before the needs of the many. The destruction of the ball fields that have served many generations of local Sacramento residents, for the needs of non-residents who have a short 4 year residence – is a prime example of this action.	As referenced on page 5 of the MND, the City of Sacramento has arranged for a replacement facility to be provided. Additional information regarding the replacement is available in the City Council Report ID: 2014-00895, which memorializes the motion by the City of Sacramento to sell the property on which the existing facility is currently sited and the obligation to construct two new ball fields meeting AAA Minor League standards.
		A-2 Building apartment complexes on vacant ground or a former golf driving range is one thing, but to destroy history is another.	The existing facility was not identified as a previously listed historical resource on the California Historical Resources Information System and has not been officially evaluated for listing or considered an historical resource due within the MND due to its relatively young age. Further, it does not generally appear to meet any of the four criteria for designation under CEQA Section 15064.5 as referenced on page 22 of the MND. <a href="http://ohp.parks.ca.gov/?page_id=21238">http://ohp.parks.ca.gov/?page_id=21238</a>

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A	Richard Scherer	A-3 Let me remind you and the committee of the following description when CBS television reviewed the BEST facilities in the Sacramento area...	This comment refers to an opinion of the local media regarding the existing facility; however, it does not address the adequacy of the MND, therefore no further response is required.
A	Richard Scherer	A-4 Built in the late '90s as local officials saw a need to provide a couple of quality fields for <u>Sacramento's burgeoning population</u> , the Dan McAuliffe Memorial Ball Parks were built. With lights that surpass AAA minor league standards, the lights stretch a good 320 feet down both left and right field lines and 410 feet to center field.	This comment references the quality of design related to the existing facility; however, it does not address the adequacy of the MND, therefore no further response is required.
A	Richard Scherer	A-5 <u>More than one generation of Sacramento's own residents have played ball there, and many of their kids now do too.</u> In total, there are three fields for you to choose from.	See response to Comment A-2.

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B	Dan Kopp	B-1: <b>Aesthetics: c)</b> As a long-time resident, I have enjoyed the visual character of the ballfields and quality of habitat it provides for resident breeding birds such as Black Phoebes and American Robins and as foraging habitat for Canada Geese. The removal of this installation will substantially degrade the visual character of an open park-like facility and replace it with asphalt and concrete and a constant, instead of intermediate (game time), occupation during the school year. This should be at least checked as Less Than Significant Impact with Mitigation Incorporated or Potentially Significant Impact.	<p>This comment describes the existing facility as habitat for various species of birds as an aesthetic value. Impacts to wildlife habitat are evaluated per the CEQA Guidelines in the Biological Resources section of the Initial Study (pages 19-21). The existing facility does not qualify as a protected habitat.</p> <p>Impacts to aesthetics are evaluated in the Initial study (page 12). The project site/ballfields do not provide scenic vistas. The project proposes to provide a vibrant and visually attractive urban environment that would complement and enhance the adjoining campus' distinct visual identity. Therefore, the project would not result in significant impacts relative to aesthetics.</p>
B	Dan Kopp	B-2 <b>Population and Housing: a)</b> The first sentence in the reply is doublespeak. How can constructing an in-fill project that would create new residence halls for up to 1,100 students not be inducing substantial population growth in that area, when that parcel has never contained housing, save maybe prior to construction of HWY 50 in the late 1960's? I prefer students seek housing in the city than be concentrated in one giant mess of an instant mini city. I have been considering moving from my nearby residence of 17 years due to the plague of homelessness, but the University is beginning to weigh in heavily on the right time to leave.	The project would not result in an increase in the number of full time enrolled students at the campus, but would provide housing for the existing campus population size. The additional housing is expected to alleviate existing demand as discussed on Page 45 of the MND. The regional population would not be impacted by completion of the project.

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B	Dan Kopp	B-3 The recent Crossings population induction, which demanded a new intersection on Folsom that will have me avoiding that corridor and the businesses it houses, and now this proposal combine as definite factors for Mandatory Findings of Significance b).	By, "Crossings population induction" the commenter appears to be referring to The Crossings, a 225-unit student housing project located on Ramona Avenue on the south side of the US-50 freeway. This City of Sacramento project was the subject of an MND dated June 2016. By "new intersection," the commenter appears to be referring to the intersection of Folsom Boulevard with Ramona Avenue. This new intersection, which is currently under construction, is part of the Folsom Boulevard Widening/Ramona Avenue Extension Project, which was the subject of an EIR in 2011. Whatever objections the commenter may have to those projects have no bearing on the current, unrelated project. The current project would decrease eastbound traffic (i.e. improve operations) on Folsom Boulevard during the AM peak hour, which is the worst hour of the day for that section of road (see Exhibit 27 in the Traffic Impact Study).
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B	Dan Kopp	B-4 There is no way to guarantee additional student housing would reduce commuter vehicular trips to campus. Am I to believe the proposed residents of this project would be forced to walk, ride a bike or ride a campus bus to the university? This prediction of reduced commuter vehicular trips is bogus at best and misleading at the worst; with additional student housing it can only be certain it will increase by 1,100 the number of vehicles accessing that parcel for months at a time compared to the 50 or so that do so intermittently for ball games at the current facility.	As mentioned throughout the MND, providing additional on-campus housing would not change the number of students enrolled at CSUS (pages 16, 55). Providing additional on-campus housing would eliminate the need for 1,100 students to commute to the campus, thereby reducing vehicle commuter trips. Per the Transportation Impact Study (Appendix IX), because the trip-generation rate for students is lower when they live on campus, the proposed residence halls would result in a net reduction in vehicle trips to campus (refer to TIS Exhibit 25.)
B	Dan Kopp	B-5 How is the second sentence backed up, with any real numbers? And what does it even mean? The IS does nothing but admit traffic congestion will be exacerbated by the proposed project, namely at Howe Avenue and College Town where there are already accidents waiting to happen with unmetered cross traffic.	<p>The “second sentence” that the commenter is referring to is on page 50 of the IS and reads, <i>“Combining the reduction in commuter vehicular trips with the increase in vehicular trips generated by the project, would result in an overall net reduction in trip generation.”</i></p> <p>As explained in Section 6.A. of the Traffic Impact Study (Appendix IX of the IS/MND), the number of vehicle trips generated by students residing on Sacramento State’s campus was calculated using driveway counts at the parking lots of existing residence halls on campus (see TIS Exhibit 20). Similarly, the vehicle trip generation rate for off-</p>

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			<p>campus students was calculated using driveway counts at their parking lots. (see TIS Exhibit 24). Because the trip-generation rate for students is lower when they live on campus, the proposed residence halls would result in a net reduction in vehicle trips to campus (see TIS Exhibit 25).</p> <p>The Howe Avenue/College Town Drive intersection is fully signalized; i.e. every approach is subject to control by traffic signals. Therefore, it cannot be determined to what “unmetered cross traffic” the commenter is referring. In any case, if the commenter feels that there is some imperfection in the design of this intersection then it is an existing deficiency and not an impact of the proposed project. The existing level of service, while poor, is again an existing deficiency not attributable to the proposed project. The LOS at that intersection in 2020 is expected to be D in the AM peak hour and E in the PM peak hour whether the residence halls are constructed or not. As can be seen in Exhibit 29 of the Traffic Impact Study, the traffic operations analysis shows that the proposed residence halls would have no significant impact on the Howe Avenue/College Town Drive intersection.</p>
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B	Dan Kopp	B-6 The portion of East University Dr. where the current vehicle access to the ballfields is located would become an unruly entrance and exit back-up, forcing folks to alter their many year's long routes just to accommodate transitory citizens. That is near completion with the Crossings intersection on Folsom and adds another combining negative impact for Mandatory Findings of Significance b).	It is assumed the commenter is referring to State University Drive. The proposed driveway on State University Drive would be right-in-right-out with a raised median as reflected in Exhibit 27 of the Traffic Impact Study (Appendix IX of the MND), to prevent left turns which would avoid queuing on State University Drive both for entering or exiting vehicles. Analysis of Plus Project traffic operations shows that the driveway would have acceptable A and B levels of service and have no effect on intersections on Folsom Boulevard as referenced in Exhibit 29 of the Traffic Impact Study.
B	Dan Kopp	B-7 Please let me know if need to submit an additional comment, or if I have a comment file that can describe what a "smooth mile away" is.	Neither the initial study nor the MND references a "smooth mile away." It is unclear what this comment references in terms of the document under review.

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B	Dan Kopp	B-8 Yes, and please add this article: <a href="https://www.kcra.com/article/parking-shortage-frustrates-sacramento-renters-at-new-complex/23189940">https://www.kcra.com/article/parking-shortage-frustrates-sacramento-renters-at-new-complex/23189940</a> in my comment file, showcasing the increase in vehicle traffic with not only residents but visitors. This is testimony to the University's knowing misinterpretation of the deleterious effects of a misguided master plan that doesn't care much for negative effects on long-term neighbors, but instead favors the University and its transitory student population.	This comment alludes to parking concerns within the vicinity of the project site. As referenced in the MND (pages 1 and 55), the project would provide surface parking. Parking provided by the project would be in addition to existing parking provided by the campus and evaluated under the approved campus plan, which actually expands student parking facilities.
C	Central Valley Regional Water Quality Control Board	C-1 Pursuant to the State Clearinghouse's 24 August 2018 requests, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the <i>Request for the Negative Declaration</i> for the Student Housing East Project, located in Sacramento County.	This serves as an introduction to the Water Quality Board's letter and acknowledges CVRWQB's review of the Mitigated Negative Declaration and briefly summarizes the agency's delegation of responsibility for protecting the quality of surface and groundwater. This comment does not address the adequacy of the MND, therefore no further response is required.
C	Central Valley Regional Water Quality Control Board	C-2 <b>Basin Plan</b> The Central Valley Water Board is required to formulated 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	This comment provides the regulatory setting establishing the responsibility of CVRWQCB with establishing a basin plan requiring all discharges to be compliant with the Antidegradation Policy. The establishment of responsibility to CVRWQCB does not relate to the project and no further response is required.



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		<p>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 1975m 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 <i>Water Quality Control Plan for the Sacramento and San Joaquin River Basins</i>, please visit our website.</p>	
C	Central Valley Regional Water Quality Control Board	<p>C-3 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 Policy is available on page IV-15.01 at:  <a href="http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf">http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf</a>  In part it states:</p>	<p>This comment references the requirement to evaluate potential impacts to waste discharge. As referenced on pages 39-40 of the MND, project design would account for all necessary drainage facilities to accommodate storm water and discharges. The MND calls for mitigation</p>

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		<p><i>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.</i></p> <p><i>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.</i></p> <p>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.</p>	<p>requiring the preparation of a storm water pollution prevention plan, which, as a standard, will provide for appropriate National Pollutant Discharge Elimination System measures.</p>
		<p>C-4 Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity <u>Construction General Permit Order 2009-0009-DWQ</u>. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.</p> <p>The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP).</p> <p>For more information on the Construction General Permit, visit the State Water Resources Control Board website at: <a href="http://www.waterboards.ca.gov/water_issues/programs/stormwater/constrpermits.shtml">http://www.waterboards.ca.gov/water_issues/programs/stormwater/constrpermits.shtml</a></p>	<p>This comment refers to the requirement that a Construction General Permit be obtained for construction and that the a SWPPP be developed as part of that permit. The MND calls for the development of a SWPPP per mitigation measure WQ-1 (page 39) to comply with this requirement.</p>

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C	Central Valley Regional Water Quality Control Board	<p>C-5 <b><u>Phase I and II Municipal Separate Storm Sewer System (MS4) Permits</u></b> 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.</p> <p>For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at: <a href="http://www.waterboards.ca.gov">http://www.waterboards.ca.gov</a></p>	This comment does not address the adequacy of the MND, therefore no further response is required.

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		<p><a href="#">/centralvalley</a>  <a href="#">/water_issues/storm_water/municipal_permits/</a>.  For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:  <a href="http://waterboards.ca.gov">http://waterboards.ca.gov</a>  <a href="#">/water_issues</a>  <a href="#">/programs/stormwater/phase_ii_municipal.shtml</a>  <b><u>Clean Water Act Section 404 Permit</u></b>  If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.  If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.0  <b><u>Clean Water Act Section 401 Permit – Water Quality Certification</u></b> If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to</p>	
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		<p>initiation of project activities. There are no waivers for 401 Water Quality Certifications.</p> <p><b><u>Waste Discharge Requirement – Discharge to Waters of the State</u></b> If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.</p> <p>For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at: <a href="http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml">http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml</a>.</p> <p><b><u>Dewatering Permit</u></b> 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.</p> <p>For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water</p>	
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		<p>Board website at:  <a href="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</a>.  For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at: <a href="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</a></p>	
C	Central Valley Regional Water Quality Control Board	<p>C-6 <b><u>Regulatory Compliance for Commercially Irrigated Agriculture</u></b> If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:</p> <p><b>1. Obtain Coverage Under a Coalition Group.</b> Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: <a href="http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growers/apply_coalition_group/index.shtml">http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growers/apply_coalition_group/index.shtml</a> or contact water board staff at (916) 464-4611 or via email at <a href="mailto:IrrLands@waterboards.ca.gov">IrrLands@waterboards.ca.gov</a>.</p> <p><b>2. Obtain Coverage Under the General Waste Discharge Requirement for Individual Growers, General Order R5-2013-0100.</b> Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and</p>	<p>State land is not currently used for commercially irrigated agriculture. This comment does not address the adequacy of the MND, therefore no further response is required.</p>

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		submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084+\$6.70/Acre); the cost to prepare annual monitoring reports and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at <a href="mailto:IrrLands@waterboards.ca.gov">IrrLands@waterboards.ca.gov</a> .	
C	Central Valley Regional Water Quality Control Board	<p>C-7 If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (SPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for <i>Dewatering and Other Low Threat Discharges to Surface Waters</i> (Low Threat General Order) or the General Order for <i>Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water</i> (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.</p> <p>For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  <a href="http://waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf">http://waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf</a>.</p>	If construction dewatering of the site is required, the project will seek coverage under a National Pollutant Discharge Elimination System as standard under the General Permit. This comment does not address the adequacy of the MND, therefore no further response is required.

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		<p>C-8 <b>NPDES Permit</b> If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:  <a href="http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml">http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml</a>.</p>	<p>The proposed project will not discharge waste that could affect the quality of surface waters of the State. No further response is required.</p>
D	City of Sacramento Department of Utilities	<p>D-1 The <b>Hydrology and Water Quality</b> discussion does not mention the incorporation of post construction stormwater quality measures. The City of Sacramento post construction stormwater quality requirements include:</p> <ul style="list-style-type: none"> <li>○ Source Control Measures (waste management area design, vehicle wash area design, other measures as applicable)</li> <li>○ Treatment Control Measures (bioretention planters, vegetated swales, infiltration measures)</li> <li>○ Low Impact Development Measures (bioretention planters, infiltration measures, pervious pavement)</li> </ul> <p>Please ensure that the project design incorporates all of these required post construction measures. Please refer to the <b>2018 Stormwater Quality Design Manual for the Sacramento Area</b>  <a href="http://www.beriverfriendly.net/newdevelopment/stormwat">http://www.beriverfriendly.net/newdevelopment/stormwat</a></p>	<p>The MND proposes stormwater mitigation measure WQ-1 (Pages 39-40) for stormwater mitigation during construction. The SWPPP will be developed in accordance with the SWRCB General Permit 99-08-DWQ for Construction Activities, which requires post construction stormwater quality best management practices and a maintenance schedule as a standard for all SWPPPs (State Water Resources Control Board Construction General Permit Fact Sheet, Section L, Page 37).</p>



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		<a href="#"><u>erqualitydesignmanual/</u></a> ) for more information on the selection and design of these measures.	
D	City of Sacramento Department of Utilities (cont'd)	D-2 The City of Sacramento requires a maintenance agreement to be executed for all proposed onsite post construction stormwater quality measures. The maintenance agreement shall be signed and submitted to the City of Sacramento upon approval of the improvement plans. Please refer to the attached maintenance agreement template for more information.	The MND proposes stormwater mitigation measure WQ-1 (Pages 39-40) for stormwater mitigation during construction. The SWPPP will be developed in accordance with the SWRCB General Permit 99-08-DWQ for Construction Activities, which requires post construction stormwater quality best management practices and a maintenance schedule as a standard for all SWPPPs (State Water Resources Control Board Construction General Permit Fact Sheet, Section L, Page 37).
E	Sacramento Municipal Utilities Department	E-1 The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Mitigated Negative Declaration (MND) for the Student Housing East Project (Project, SCH 2018082052). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.	This serves as an introduction to the Sacramento Municipal Utilities Department letter and acknowledges SMUD's review of the Mitigated Negative Declaration and briefly summarizes the agency's vision and responsibility to its customers. This comment does not address the adequacy of the MND, therefore no further response is required.

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E	Sacramento Municipal Utilities Department	<p>E-2 It is our desire that the Project MND will acknowledge any Project impacts related to the following:</p> <ul style="list-style-type: none"> <li>• Overhead and or underground transmission and distribution line easements.</li> </ul> <p>Please view the following links on smud.org for more information regarding transmission encroachment:</p> <ul style="list-style-type: none"> <li>• <a href="https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services">https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services</a></li> <li>• <a href="https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way">https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way</a></li> </ul>	The project has been coordinating with SMUD regarding the electrical infrastructure needs of the housing project. All new or re-aligned transmission and distribution facilities and associated easements would be located within the project footprint, as analyzed in the MND or the adjacent right-of-way.
E	Sacramento Municipal Utilities Department	<p>E-3 (It is our desire that the Project MND will acknowledge any Project impacts related to the following:)</p> <ul style="list-style-type: none"> <li>• Utility line routing</li> <li>• Relocation or removal of existing SMUD facilities on or adjacent to the project area.</li> <li>• Existing easements on or adjacent to the subject property for SMUD infrastructure.</li> </ul>	All re-routing of utility lines and relocation and/or removal of existing SMUD facilities would occur within the project footprint as analyzed in the MND (or the adjacent right-of-way). No facilities would be placed outside of the project study area, and therefore, all impacts associated with the placement of such facilities have been adequately described within the MND.
E	Sacramento Municipal Utilities Department	<p>E-4 (It is our desire that the Project MND will acknowledge any Project impacts related to the following:)</p> <ul style="list-style-type: none"> <li>• Electrical load needs/requirements</li> </ul>	The project has been coordinating with SMUD regarding electrical infrastructure. All onsite electrical infrastructure will be constructed compliant with code.
E	Sacramento Municipal Utilities Department	<p>E-5 (It is our desire that the Project MND will acknowledge any Project impacts related to the following:)</p> <ul style="list-style-type: none"> <li>• Energy Efficiency</li> </ul>	As discussed on page 34 of the MND, the proposed student housing facilities would be designed to comply with 2016 energy efficiency requirements prescribed by Title 24 of the California Building Code with project design meeting Calgreen criteria. These measures would ensure

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			the energy efficiency of the project during operations.
E	Sacramento Municipal Utilities Department	E-6 (It is our desire that the Project MND will acknowledge any Project impacts related to the following:) <ul style="list-style-type: none"> <li>• Climate Change</li> </ul>	As discussed on page 34 of the MND and in response to comment E-5, the proposed student housing facilities would be designed for energy efficiency, which, in turn would reduce reliance on energy resources. In addition, the proposed project connects student residences to the campus and reduces automobile commuter trips as stated on page 35 of the MND. Reduction of commuter trips (reduced trip length) also would contribute to emissions reductions.
E	Sacramento Municipal Utilities Department	E-7 (It is our desire that the Project MND will acknowledge any Project impacts related to the following:) <ul style="list-style-type: none"> <li>• Cumulative impacts related to the need for increased electrical delivery</li> </ul>	Refer to the response to E-2. The project is a student housing project and would not place substantial new demands on the energy transmission system; therefore, the project would not result in a cumulatively considerable contribution to the energy transmission and distribution system in the project area.
E	Sacramento Municipal Utilities Department	E-8 SMUD would like to offer the following project specific comments: <ul style="list-style-type: none"> <li>• The MND does not acknowledge the need for electrical infrastructure. This project would require a pad mounted transformer that will service this project; therefore, there are existing SMUD distribution (12kV) and sub-transmission (69kV) facilities within the Student Housing East project area that will need to be maintained if areas are developed /redeveloped</li> </ul>	See response to comments E-2 and E-3.

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E	Sacramento Municipal Utilities Department	<p>E-9 SMUD would like to offer the following project specific comments:</p> <ul style="list-style-type: none"> <li>• Additional distribution facilities will be required in vacant areas when developed potentially along the Folsom Blvd corridor or College Town Drive and State University Drive corridors. These areas would need to be evaluated for potential biological impacts.</li> </ul>	See response to comment E-3. All project distribution lines and associated infrastructure would be located within the project site analyzed in the MND. The vacant areas referenced in the comment do not support sensitive biological resources. The MND acknowledges the presence of mature trees (see page 20), and mitigation for nesting birds is provided (MM-BIO-1)
E	Sacramento Municipal Utilities Department	<p>E-10 SMUD would like to offer the following project specific comments:</p> <ul style="list-style-type: none"> <li>• No additional distribution substations are anticipated</li> <li>• No additional sub-transmission routes are anticipated</li> </ul>	This comment does not address the adequacy of the MND, therefore no further response is required.
E	Sacramento Municipal Utilities Department	<p>E-11 More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:</p> <p>SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.</p>	This comment requests collaboration as project design is advanced. The project proponent accepts the benefit for both parties to collaborate going forward.
E	Sacramento Municipal Utilities Department	<p>E-12 Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NEG.</p> <p>If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera, at rob.ferrera@smud.org or 916.732.6676.</p>	This serves as a conclusion to the Sacramento Municipal Utilities Department letter and identifies a key staff contact at SMUD for follow up. This comment does not address the adequacy of the MND, therefore no further response is required.

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F	City of Sacramento Department of Public Works	F-1 The City of Sacramento appreciates the opportunity to review and comment on the Mitigated Negative Declaration for the South Campus Student Housing at CSUS (August 2018). The new student housing facilities would provide up to 1,100 beds in a mix of 4-bedroom, 2 bedroom, and studio apartment units as well as support spaces such as lounges, multipurpose rooms etc.	This serves as an introduction to the City of Sacramento Department of Public Work's letter and acknowledges the department's review of the Mitigated Negative Declaration. This comment does not address the adequacy of the MND, therefore no further response is required.
F	City of Sacramento Department of Public Works	F-2 As CSUS may be aware, the parcel immediately to the east of the South Campus Housing project, currently occupied with a parking lot and low-rise office building, may be the site of a second student housing project. Please note that the proposed northbound project driveway at this signal should be designed to allow future access to future redevelopment of this parcel.	The project has been in discussions with the owners of the adjacent property, who have mentioned several possible uses for the site, including student housing or office uses. The proposed design for the driveway and signal modifications for the College Town Drive/Fairbairn Road intersection would allow for joint use of the driveway with either of those uses, upon negotiations between the parties.
F	City of Sacramento Department of Public Works	F-3 The City of Sacramento Department of Public Works provided comments on CSUS Campus Master Plan 2015 Draft Environmental Impact Report (SCH# 2014102021) on March 12, 2015. Many concerns expressed in the above referenced comment letter are still valid, particularly, the comments listed in the bullet points #3 and #6 of the letter.  3. The City has extensive experience dealing with traffic and traffic signals in and around CSUS campus. The City has made many field observations and has regularly monitored these locations through CCTV count stations, and traffic signal controllers from the City's Traffic Operation Center. The traffic study provided in the DEIR for	The City's reference to discussions dating back to 2015 show that the problems described are existing deficiencies unrelated to the current project, which was not contemplated at that time. By state law, a new project cannot be required to rectify existing deficiencies (See California General Code Section 66001(g)). The proposed project <i>reduces</i>

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		<p>the Campus Master Plan indicates LOS higher (better) than what the City has observed. Vehicular queuing commonly occurs from State University Drive / College Town, west on Folsom Blvd and then south the 65<sup>th</sup> / Hwy 50.</p> <p>In addition, queuing occurs from State University Drive/College Town east on College Town to Hornet Drive to Folsom Blvd / Bicentennial Way. In addition, there are significant queues that occur at the Hwy 50 to Hornet off-ramp. The City believes the LOS reported in the traffic study does not reflect the actual LOS at these intersections.</p> <p><u>The City has observed that a significant amount of the queuing occurs on City streets due to poor operation and inadequate lane capacity at State University Drive / College Town.</u> It is possible that the LOS reported by the traffic modeling software is better due to the traffic signals being starved. <u>This condition occurs when queue is so significant that vehicles arriving at the back of the queue do not reach the intersection in one cycle.</u></p> <p>As a result of the existing conditions and knowing that the outcome of the traffic model used in the Campus Master Plan DEIR does not reflect the existing conditions, we are requesting that the traffic analysis revised to better represent the existing conditions. For example traffic simulation at congested intersection provide more accurate outcome of the traffic model and could be utilized in these analysis.</p> <p>6. Adding more student housing on the Campus will increase the pedestrian and bicycle activity on City facilities <u>and will require improvements to the intersections adjacent to the project site.</u> The City is willing to work with Sacramento State University to identify the necessary improvements to the transportation facilities nearby University Campus. <u>Some potential improvements may include widening northbound approach of State University Drive at College Town intersection,</u> relocation of bus stops to change pedestrian crossings, westbound approach right turn channelization, installation of ITS elements, and other. <u>An agreement between the City and CSUS regarding the operation and maintenance of this signal would ensure efficiency of the transportation system operation in the proximity to CSUS.</u></p>	<p>vehicular traffic through the intersection (see Exhibit 27 in the TIS).</p>
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		<p>The response to comments section of the FEIR to comment 3 (2-3 in FEIR) included the statement " ... the queuing problem is short-lived; 15 to 20 minutes during the peak of the peak hour and much of the queuing occurs on campus streets rather than City streets ..."</p> <p>The response to comment 6 (2-6 in FEIR) noted how on campus student housing is consistent with many City, County and Campus Master Plan Goals.</p> <p>The City continues to monitor intersections around CSUS' campus from its Traffic Operations Center. Monitoring indicates that significant vehicular queuing continues to occur at several adjacent intersections due to poor operation and inadequate lane capacity. One of them, as noted in comments on the Campus Master Plan in 2015, is State University Drive and College Town Drive intersection. Adding the project vehicular trips generated by the proposed student housing and increased number of pedestrians will cause more delay and queuing.</p> <p>Our observations show the queuing problem is not short lived and routinely occurs throughout the entire morning peak hour. Furthermore, the intent of comment 6 was to highlight some of the infrastructure improvements that would be required from increased pedestrian and bicycle activity, such as widening the northbound approach of State University Drive at College Town Drive.</p> <p>The northbound direction on State University Drive routinely queues back from the State University Drive and College Town intersection back to Folsom Boulevard. Furthermore, even providing 60 seconds of continuous northbound green at the State University Drive and College Town intersection is not enough time to clear the morning queue. The continuing design issue at this intersection is that the one northbound lane from which lefts, throughs, and right turns movements are allowed is not adequate.</p>	
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F	City of Sacramento Department of Public Works	<p>F-3 Accordingly, City of Sacramento does not consider the proposed mitigation measure TRA-1 as sufficient to address the increased vehicular volumes and pedestrian activity at State University Drive and College Town Drive intersection. Widening of the northbound approach at this intersection to two lanes and installing ITS elements are imperative to improve the operation of this intersection. Two continuous northbound travel lanes are needed on State University Drive between Folsom Boulevard and College Town Drive. City requests the mitigation measure TRA-1 to be modified as follows:</p> <p style="padding-left: 40px;">Widen the northbound approach at the State University Drive and College Town Drive intersection to two lanes and install ITS elements to improve the operation of this intersection. Install two continuous northbound travel lanes on State University Drive between Folsom Boulevard and College Town Drive.</p>	<p>As indicated in the TIA, the current project would, in fact, <u>reduce</u> vehicular traffic at this intersection, not increase it (see Exhibit 27 in the Traffic Impact Study).</p> <p>The current project's only impact on this intersection is to increase pedestrian traffic. The mitigation measure suggested in the City's letter would arguably worsen conditions for pedestrians by increasing the width of road they must cross and increasing the vehicle flow opposing their movement. Therefore, the measure requested by the City would be an inappropriate response to increased pedestrian activity. In contrast, the University's proposed mitigation measure, which would increase the capacity of the intersection to safely accommodate increased pedestrian traffic, is a more appropriate response.</p> <p>It should be noted that the City of Sacramento General Plan Policy M 1.2.2.B. states that LOS "F" is allowed in Priority Investment Areas (see page 2-166 in <a href="http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/Mobility.pdf?la=en">http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/Mobility.pdf?la=en</a>). Figure M1 in this document shows that the project site is in a Tier 1 Priority Investment Area. This</p>
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			<p>is discussed in Section 3.B of the TIS. The University's proposed treatment of this intersection is therefore consistent with the City General Plan.</p> <p>The University is not averse to further discussions with the City regarding ways to improve traffic flow in the project vicinity. However, such discussions would need to be outside the context of the environmental review of the current project.</p>
F	City of Sacramento Department of Public Works	F-4 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 me at (916) 808-8930 or by email at pclarke@cityofsacramento.org	<p>This comment requests continued communication as the proposed project advances. California State University acknowledges and will abide the request. This comment does not address the adequacy of the MND in analyzing the current project therefore no further response is required.</p>
G	State of California Governor's Office of Planning and Research	<p>The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 24, 2018, and the comments from the responding agency(ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.</p> <p>Please note that Section 21104(c) of the California Public Resources Code states that:</p>	<p>This comment acknowledges compliance with the State Clearinghouse review requirements. The enclosed letter is a copy of the Central Valley Water Resources Control Board (Letter C, above). This comment does not address the adequacy of the content of the MND in analyzing the current project therefore no further response is required.</p>

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		<p>“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”</p> <p>These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.</p> <p>This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.</p>	
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