

CITY OF CITRUS HEIGHTS

CITY COUNCIL STAFF REPORT MEMORANDUM

SUBJECT:	Electric Greenway Trail Project Adoption of Initial Study/Mitigated Negative Declaration
	Leslie Blomquist, Senior Civil/Traffic Engineer
	Stuart Hodgkins, City Engineer
	Casey Kempenaar, Senior Planner
	Colleen McDuffee, Planning Manager
FROM:	Rhonda Sherman, Community Services Director
	Christopher W. Boyd, City Manager
10.	
TO:	Mayor and City Council Members
DATE:	June 27, 2019

Summary and Recommendation

Staff has prepared the Electric Greenway Trail Project (Project) Initial Study and Mitigated Negative Declaration to identify and assess anticipated environmental impacts of the proposed Project. The Project proposes to construct a nearly 3-mile multi-use trail that will provide bicycle and pedestrian facilities largely following an existing Sacramento Municipal Utility District (SMUD) overhead transmission corridor between Arcade Creek Park Preserve and Wachtel Way in both Citrus Heights and unincorporated Orangevale (see Attachment 2). The Project includes a direct connection to another proposed multi-use trail approved as part of Mitchell Farms and to Woodside K-8 School.

In addition to a ten-foot wide paved trail with two-foot-wide shoulders on either side, the project includes two bicycle/pedestrian bridges, minor retaining walls and ramps, lighting, and associated improvements.

Staff recommends the City Council adopt the attached resolution adopting the Mitigated Negative Declaration and Mitigation Monitoring Plan for the Electric Greenway Trail Project.

Motion: Move to approve Resolution No. 2019-____, as shown in Attachment 1, a Resolution of the City Council of the City of Citrus Heights, adopting the Citrus Heights Electric Greenway Trail Initial Study/Mitigated Negative Declaration and Mitigation Monitoring Plan.

Fiscal Impact

There will be no fiscal impact to the 2018/2019 Fiscal Year General Fund Budget to adopt the Initial Study/Mitigated Negative Declaration. There is a one-time cost of \$2,394.75 to file the CEQA-required Notice of Determination with the County Clerk, if the Council approves the project. Although not programmed in the 2018-2019 Capital Improvement Program (CIP), there are sufficient Measure A Capital (Pedestrian Safety) (Fund 310-31-684) funds available to supplement the project funding and cover this cost.

Previously, the city secured \$6.2 Million in grant funds. These grant funds have specific deadlines in which they must be obligated. Currently \$350,000 of the grant funds have been obligated (Fund 390-31-738) for the preliminary engineering and environmental document phase of the project. Adoption of the Initial Study/Mitigated Negative Declaration is required before any remaining grant funding can be obligated to this project.

Background

As early as the 1970s, Sacramento County identified the SMUD corridor as a location for a pedestrian, bicycle, and equestrian trail. As property was subdivided along the SMUD corridor, pedestrian, bike, and equestrian easements were dedicated benefitting Sacramento County to allow for future trail installation. The City of Citrus Heights' General Plan and Zoning Map identify this corridor as Open Space.

In 2014, the City Council approved the Creek Corridor Trail Project, a feasibility project that evaluated the potential for multi-use trails along the SMUD corridor and creek corridors. City Council directed staff to proceed with funding, design, environmental review and construction for the Priority 1 Trail Segments (including the Electric Greenway).

In 2015, the city adopted a Bikeway Master Plan and General Plan Update which included the Electric Greenway as a priority project. The area known as the Electric Greenway is identified and shown in the Sacramento County Bikeway Master Plan providing connectivity to the east of Wachtel Way and through Citrus Heights.

In 2016, the city adopted a Pedestrian Master Plan which identified the Electric Greenway as a priority project for the city.

In 2017, the city applied for, and subsequently received, grant funding from the state Active Transportation Program for the design, environmental documentation and construction of the Electric Greenway Trail Project. The grant application for the Project is a partnership between the city, Sunrise Recreation and Park District (SRPD), Orangevale Recreation and Park District (ORPD), San Juan Unified School District (SJUSD), Sacramento Municipal Utility District (SMUD), and Sacramento County (County).

In late 2018, Project partners began work on the Preliminary Design and Environmental Documentation of the project and hired GHD, Inc. as the prime consultant to assist on this phase of the Project. Since that time, preliminary engineering has been completed and the Project has

Subject: Electric Greenway Trail Project – Adoption of Initial Study/Mitigated Negative Declaration Date: June 27, 2019 Page 3 of 15

been evaluated for potential environmental impacts under the California Environmental Quality Act (CEQA).

Attachment 1 includes the revised Initial Study/Mitigated Negative Declaration, which evaluates the potential environmental impacts and includes mitigation measures to reduce potential impacts to less than significant levels.

Project Description

The Electric Greenway Trail Project is a nearly 3-mile multi-use trail connecting between Arcade Creek Park Preserve (ACPP) and Watchel Way. The proposed ten-foot wide, paved trail will have 2-foot wide decomposed granite shoulders on either side for a total width of 14 feet. Please refer to Attachment 2 for the overall trail map.



Figure 1 - Example of Typical Trail Section

The Project provides connectivity between numerous neighborhoods, the Sunrise MarketPlace, seven public parks, Woodside K-8 School, and will directly connect to a new trail to be constructed as part of the upcoming Mitchell Farms development.

On the western limits, the Project begins at ACPP connecting to an existing trail network within the established park. The Project includes roadway improvements along Sunrise Boulevard utilizing the existing signalized crossing at Sayonara Drive.

From Sunrise Boulevard the Project travels along the south side of an existing SMUD access road providing connection to Mitchell Farms and enters Tempo Community Park adjacent to the existing SMUD substation. The Project will upgrade existing sidewalks in Tempo Community Park and provide a new connection to Fair Oaks Boulevard.

The Project will install a new pedestrian activated signalized crossing of Fair Oaks Boulevard between Tempo Community Park and Sundance Natural Area (owned and maintained by ORPD). At this location, the trail temporarily leaves the city and enters unincorporated Orangevale. The Project will travel through Sundance Natural Area, replace an existing bridge across Arcade Creek and provide improved connectivity to Highwood Way (Sacramento County). The project will then travel along the existing roadway connecting to Woodmore Oaks Drive where it again intersects with the SMUD corridor. An enhanced crosswalk will provide a safe crossing of Woodmore Oaks Drive.

From Woodmore Oaks Drive, the trail will continue northeast passing through Streng Avenue Open Space (owned and maintained by ORPD), ultimately providing a connection to Streng Avenue where another enhanced crossing will be provided. At Streng Avenue, the project reenters the city and enters Northwoods Park. The project includes a loop connecting to the existing improved areas of Northwoods Park.

At Oak Avenue, the trail will provide roadway improvements connecting to the existing traffic signal at the entrance to C-Bar-C Park. The Project includes the construction of a new sidewalk along the north side of Oak Avenue, connecting C-Bar-C Park to Bearded Iris Drive. The main stem of the trail will meander through C-Bar-C Park. A trail spur will provide connectivity to Villa Oak Drive through Woodside K-8 School.

Near the northeast corner of C-Bar-C Park, the trail will continue to the northeast within existing hiking/equestrian/bikeway easements and along the SMUD corridor. An enhanced crossing will be provided to cross Villa Oak Drive.

After crossing Villa Oak Drive the project will utilize an existing bike/pedestrian/equestrian easements between homes on Claypool Way and Olivine Avenue, connecting to Woodside Oaks Park/Olivine Drive Open Space. Within Woodside Oaks Park, a new bridge over Cripple Creek will be constructed providing connectivity to the trails terminus at Wachtel Way.

Environmental Determination

In 2015, the city adopted an updated Bikeway Master Plan (BMP) and General Plan Bikeway Map. These documents serve as the programmatic policy documents which set forth the city's objectives related to bicycle infrastructure, including the Electric Greenway Trail Project. In accordance with the requirements of CEQA, the city adopted an Initial Study/Mitigated Negative

Declaration (IS/MND) which identified several measures to mitigate the potential impacts of the projects identified in the BMP to less than significant levels.

Specific details on trail alignments were unknown at the time, so many of the mitigation measures require site specific environmental review once design details of specific projects are known. Since completion of the BMP the preliminary design of the Electric Greenway Trail Project has been completed and site specific surveys have been conducted to evaluate the potential impacts of the Project.

The Electric Greenway Trail Project Initial Study built on the work completed for the BMP and General Plan Bikeway map IS/MND and the more specific site surveys along the proposed trail route. The Electric Greenway Trail Project Initial Study thoroughly analyzed the potential for environmental impacts in numerous areas, such as aesthetics, air quality, biological resources, hydrology and water quality, noise, and traffic.

As a result of the environmental analysis described in the Initial Study, it was determined that with the incorporation of several mitigation measures, the project will not have a significant effect on the environment. The Initial Study determined that an Environmental Impact Report (EIR) is not required for the project and that a IS/MND is the appropriate level of review under CEQA because it is feasible to mitigate all potentially significant impacts to a less than significant level.

The Electric Greenway Trail Project Initial Study/Mitigated Negative Declaration is attached for review as part of Attachment 1. The mitigation measures included within the IS/MND are summarized below (see the IS/MND for full description of each mitigation measure):

- Basic emission control measures shall be followed during construction, such as watering surfaces two times daily, utilizing street sweepers, limiting on-site vehicle speeds, completing paving as soon as possible, and requiring haul trucks to meet certain criteria.
- Numerous biological-resource-related mitigations, avoidance measures, and preconstruction surveys.
- Regulatory permitting requirements through Department of Fish and Wildlife, Army Corps of Engineers and Regional Water Quality Control Board.
- Compliance with Citrus Heights and Sacramento County Tree Preservation requirements.
- Tribal observation of ground disturbance activity.
- Cultural training for Contractors.
- Cessation of all work if cultural or human remains are encountered.
- Preparation of a hazardous materials management plan for any discovered hazardous materials or materials associated with construction equipment.
- Minimization of floodplain impacts and coordination with State, Federal, and Local flood control agencies.
- Development of a construction traffic management plan to minimize impacts to public streets and maintain a high level of safety.

CEQA requires mitigation measures be incorporated into a Mitigation Monitoring Program (MMP). The purpose of the MMP is to ensure compliance with the mitigation measures during

implementation of the Project. The MMP for the Project is attached as part of Attachment 1. The attached Resolution incorporates adoption of the MMP.

Comments on the Mitigated Negative Declaration

The IS/MND was released for public review on May 1, 2019; the public comment period on the IS/MND ended on May 31, 2019. Numerous comment letters were received on the IS/MND and are provided as Attachment 8.

The following letters were received:

Agency Comments

- SMUD
- Central Valley Regional Water Quality Control Board (RWQCB)
- California Department of Transportation (Caltrans)
- California Department of Fish and Wildlife (CDFW)
- Office of Planning and Research (OPR)

Other Comments

- Wesley and Marianne Alcorn
- Anonymous
- Patrice Ubil
- Florentine Stefanescu
- Glynn and Dennis Wright
- Peg Pinard
- Melinda Rickett
- Garry and Ginny Leipzig
- Sacramento Walking Sticks Club
- Anonymous

Agency Comments

Five agencies provided comments on the Electric Greenway Trail Project Draft IS/MND. The letter from Caltrans simply mentions they have no comments. The SMUD letter provides additional information related to their infrastructure and asks for clarifying information about the potential impact on the SMUD equipment along the trail alignment. Minor edits have been made to the IS/MND project description to address SMUD's comments.

The letter from RWQCB provides additional information about the responsibility of the RWQCB and the regulations that are applicable to the project. The Project anticipates the need to obtain a regulatory permit from RWQCB in conjunction with a permit from the Army Corps of Engineers. No changes are necessary to the IS/MND as a result of the letter from RWQCB. The OPR letter acknowledges receipt of the IS/MND for distribution to other agencies and no update to the IS/MND is necessary due to this letter.

The letter from CDFW provides additional direction and suggested clarification on four biological mitigations within the IS/MND. In response to these comments the city has edited the mitigation measures presented in the biological section of the IS/MND. These modifications strengthen the bat survey and tree mitigation measures.

Other Comments

The city received several comment letters from residents or other interested parties. These letters raise a wide variety of concerns related to the Project. Some of the comments focus on topics that are unrelated to the adequacy of the IS/MND and irrelevant to CEQA compliance, such as homelessness, drug use, law enforcement, and overall concern with the Project proximity to commenters' properties. Two commenters expressed support for the project.

Many of the comments were also pertinent to CEQA issues covered in the IS/MND. Some of the topics that were emphasized in the comments are summarized below, and, while not required under CEQA before adoption of an IS/MND, the city's responses related to the Sundance Natural Area, trail visitor vehicle trips, drainage, paving material, clarification of hydrology measures, and tree removal and mitigation are provided below.

Sundance Natural Area

Comment Summary: Comments identified a concern that the Sundance Natural Area was being developed with a trail, and assert that the area was meant to be preserved with little to no human intrusion.

Response: The Sundance Natural Area is a designated recreational area located within unincorporated Sacramento County. The term "natural area" is used to describe the wooded and generally undeveloped nature of the facility. The "natural area" label is not associated with a specific zoning or land use designation of the park facility. Additionally, the term is not synonymous with the term "nature preserve", which is an area meant to be preserved in its natural state. Further, the amenities within the Sundance Natural Area currently include a lighted walking path that is approximately eight feet wide. The proposed Project would generally follow the existing informal and formal trail network and extend and/or widen the existing trail as necessary to meet current trail design standards. No conflict associated with construction of the trail is anticipated to occur with a zoning and/or general plan designation or conflicting use.

No changes to the IS/MND are necessary as a result of this comment.

Vehicle Trips:

Comment Summary: Comments assert that implementation of the trail project would significantly increase vehicle trips in the region, thereby resulting in an increase in congestion and vehicle miles traveled.

Response: Comments included assertions that there would be an increase of "thousands and thousands of visitors" that would travel from a distance to utilize the proposed trail. However, the comments do not provide any substantial evidence supporting the commenters' assertion of the number or magnitude of visitors expected to drive to the project area. CEQA does not require evaluation of impacts that are speculative or unlikely to occur.

As stated in Section 1.17 Transportation of the IS/MND:

"The project would increase on-street and off-street recreational bicycling, walking, jogging, rollerblading and other non-cycling recreational trail use. Most recreational users would be Citrus Heights residents, with some non-residents. The city expects that a majority of bikeway users would begin and end their recreational trips at their home or worksite. However, some recreational users, including both residents and non-residents, would drive to the starting point of their recreational trip. The number of new recreational trips is not expected to be substantial. Further, the new recreational trips would typically take place on weekends and before or after work, outside peak commute hours. As a result, there would be little or no impact to traffic and no impact to levels of service resulting from increased recreational use of bikeway facilities. The potential impact is less than significant."

The trail is proposed to span 2.9 miles, largely following an existing, informal trail, and will serve the residents in the immediate vicinity of the project. The small length of trail is not anticipated to increase tourism or generate a large increase in visitors to walk, bike, or rollerblade the proposed trail alignment. Rather, the intended purpose of the trail is to increase the number of residents utilizing alternative, active modes of transportation when commuting or seeking recreational opportunities throughout the project area.

The project would provide six to eight parking spaces within the city right-of-way adjacent to the proposed Wachtel Way trailhead. The project would also eliminate ten existing parking spaces at the northeast parking lot of Woodside Elementary School on Villa Oak Drive to accommodate the pathway. Therefore, the project would not result in an increase in parking that would accommodate or induce increased on-road vehicle trips to the project site.

The project would provide trail and sidewalk connections to residences, schools, commercial centers, community parks, and open space areas along the corridor. While it possible that some residents may drive to one of the trailheads, many of which are located within other park facilities (C-Bar-C Park, Tempo Community Park, or ACPP), it is more likely that the vast majority of users would be within walking or biking distance of the trail. Therefore, the new vehicle miles traveled that may be generated by trail visitors are not anticipated to be substantial. Over the long term, the Project may decrease the vehicle miles traveled to other places in the vicinity of the trail alignment. However, it cannot be known or estimated with any certainty what that exact reduction would be. A discussion on the potential impact of vehicle miles traveled, a newly adopted traffic metric under CEQA, due to implementation of the Project was included in Section 1.17 Transportation of the Draft IS/MND.

In terms of potential congestion due to the presence of the trail, the timing of the greatest trail use would not occur during the peak hours of traffic. Trails tend to experience peak use during weekends.¹ Roadways and intersections, on the other hand, tend to experience peak congestion during morning and evening rush hours on weekdays. Therefore, the peak trail use periods would

¹ California State Parks. 2012 (October). *Draft Program Environmental Impact Report for the Road and Trail Change-in-Use Evaluation Process SCH No. 2010092023*. Prepared by California State Parks with help from Ascent Environmental, Inc.

occur outside the peak traffic periods and are not expected to alter existing level of service (LOS). Peak traffic hours typically provide the basis for the LOS standards.

No changes to the IS/MND are proposed as a result of the comments received on this issue.

Drainage/Hydrology:

Comment Summary: Comments identify concerns regarding the potential for the Project to cause drainage pattern changes, and question whether there are sufficient drainage facilities included in the design to offset impacts related to increased runoff within the Project area. Additionally, comments mention the potential for the trail to degrade water quality in the adjacent creeks, and express concern or confusion over the use of the term "engineered water quality features" in the hydrology discussion.

Response: The Draft IS/MND evaluated the potential for the Project to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site in Section 1.10 in the Draft IS/MND. As noted, the Project has the potential to cause on- or off-site flooding if it were to increase fill, or increase base flood elevations. However, the proposed mitigation measures requiring cut and fill volumes to be balanced to prevent any increase in the 100-year flood elevation would avoid this impact. In addition, the mitigation, if adopted by the Council, requires coordination with the local, state, and federal water resources and floodplain management agencies to further reduce the impact to a less than significant level. With implementation of these measures as proposed, the Project is not anticipated to exacerbate flooding risks.

During construction and post construction of the Project, compliance with the National Pollutant Discharge Elimination System (NPDES) area-wide municipal separate storm sewer system (MS4) permit is required. The preliminary design of the Project includes design features such as drainage swales and other stormwater Best Management Practices (BMPs) in order to satisfy these NPDES permit requirements. The method of compliance will be further refined through the final engineering design of the Project and will include stormwater BMPs and Low Impact Development (LID) features to satisfy these requirements. Pervious asphalt placed in key locations may be one engineering approach to comply with the NPDES requirements, among numerous other LID approaches.

Additionally, as stated in Section 1.19 of the IS/MND:

"The proposed Class I trail would result in the need for new and in some cases modified drainage facilities. These would primarily be drainage swales with underground pipes spaced at intervals to convey surface water. The impervious surfaces resulting from the new Class I bike trail would have the potential to increase the amount of water entering the city's creek system. However, the project would install water quality features consistent with proven Best Management Practices and Low Impact Development to detain, retain and otherwise infiltrate or treat the water prior to entering the creek system."

The proposed drainage swales and other drainage facilities would adequately convey runoff from the proposed pathway and would be placed appropriately based on engineering design principals in accordance with industry standards including the city's Stormwater Program and the guidelines established by the California Stormwater Quality Association (CASQA). Per CEQA Guidelines Section 15063, an initial study is neither intended nor required to include the level of detail included in an EIR and shall contain in brief form a description of the project including the location of the project. The exact locations of the drainage facilities along the proposed trail alignment are not known at this time, but they would comply with all relevant regulations and proven Best Management Practices required by the NPDES Permit, the city's MS4 Permit, city standard plans, and the city's Stormwater Program.

Additionally, it should be noted that there was some confusion regarding the term "engineered water quality features" mentioned in Section 1.10 Hydrology of the Draft IS/MND. This is in reference to the vegetated swales and other potential LID features previously mentioned to be installed along the trail alignment to capture and then treat the runoff from the trail.

Regarding water quality concerns, as stated in Section 1.10 of the Draft IS/MND, the city is required to obtain coverage under the NPDES General Permit for Storm Water Discharges associated with Construction and Land Disturbance Activities as well as develop and implement a project specific Storm Water Pollution Prevention Plan (SWPPP). The city's Construction Standards also require implementation of best management practices for sediment and erosion control, therefore impacts to water quality from construction would be minimal, as all of the required practices would be implemented.

The Draft IS/MND evaluated the Project's potential to adversely affect riparian habitats in Section 1.4.1(b). The Draft IS/MND evaluated the Project's potential to violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality in Section 1.10.1(a).

As provided in the IS/MND, Mitigation Measure BIO–4 (Clean Water Act Permitting) requires that the city obtain the mandatory Clean Water Act permits needed to implement the proposed Project. These are a Clean Water Act Section 404 permit from United States Army Corps of Engineers (USACE) and Section 401 Water Quality Certification from the RWQCB. Similarly, Mitigation Measure BIO–5 (CDFW Streambed Alteration Agreement) would require that the city obtain permission from CDFW pursuant to Fish and Game Code §1602 to work in and around drainage features. Implementation of Mitigation Measures BIO-4 and BIO-5 would reduce the potential impact of the project on wetlands and other waters and riparian woodland to a less-than-significant level by ensuring that no net loss in wetlands occurs, that disturbed areas be restored, and riparian areas reestablished. With implementation of these mitigation measures, impacts to sensitive habitats would be reduced to a less-than-significant level.

Minor edits to the IS/MND, specifically to the Biology and Drainage Mitigation Measures and the Project Description, have been made to clarify language used in the document and to clarify and strengthen the mitigation measures. The modifications to Mitigation Measures for Biology and Hydrology will further ensure the Project impacts are reduced to a less than significant level. The changes to the mitigation measure will avoid or reduce the impact to at least the same degree

Subject: Electric Greenway Trail Project – Adoption of Initial Study/Mitigated Negative Declaration Date: June 27, 2019 Page 11 of 15

as, or to a greater degree than, the original measures and will create no more adverse effect of its own than would have the original measure.

Tree Removal:

Comment Summary: Comments identified concerns related to potential impacts associated with tree removal and mitigation to compensate for the trees removed along the trail alignment.

Response: The estimated number of trees to be removed included trees that directly overlap with the proposed alignment, as well as trees whose driplines were located within the pathway alignment. As disclosed in the arborist survey, and the IS/MND and in Table 1.4.2, those totaled approximately 315 trees. Of the trees that may be removed, 302 trees qualify as protected per the city's Tree Preservation Ordinance and 13 trees do not.

Additional analysis and reduction of tree impacts will be conducted as the Project moves forward towards construction. The Project will minimize the impact to existing trees to the extent feasible in consultation with the Project arborist and engineering design; however, numerous trees will still require removal.

The IS/MND has been updated as follows (see underlined text) to include additional information about how mitigation for tree removal will occur and the criteria for success:

Mitigation Measure BIO-6: Tree Ordinance Compliance

Prior to issuance of a Building or Grading Permit for the project, the city shall submit a final Tree Impact Assessment for impacts to trees along segments located within the City of Citrus Heights and County of Sacramento. The Tree Impact Assessment report shall include all preservation measures, including details for modified construction or paving that the applicant shall undertake during construction to ensure the long-term health and safety of the trees. The impact assessment report shall take into account improvement plans that show any encroachment into the drip-lines of any protected trees including utility trenching, retaining walls, etc. If avoiding construction within the dripline of protected trees is not feasible, other mitigation measures offered by a certified arborist and accepted by the Planning Division must be made. The proposed Project will abide by the Standard Policies and Procedures for Approved Work listed in Section 106.39.050 of the city's Tree Preservation and Protection Ordinance, and the county's required measures in Sections 19.12.130, 19.12.140, 19.12.150, and 19.12.160. If required by the city or county upon approval of the Tree Permits, replacement tree plantings or in-lieu mitigation fees will be completed or paid in accordance with city and county requirements.

Tree Replacement Program: The City shall submit a Tree Replacement and Revegetation Program that identifies all of the following:

- <u>the number of protected trees to be removed from the project site and the total</u> <u>diameter inches of those trees;</u>
- the number, size, and location of trees to be planted;

- a maintenance and monitoring program for replacement trees; and
- the anticipated amount, if any, to be paid to the city's in-lieu fee for protected tree removal.

Replacement Tree Monitoring: <u>Replacement trees planted by the city shall be monitored</u> for a period of 3 years. The city shall retain a qualified arborist or biologist to complete annual monitoring reports. The monitoring reports shall provide information regarding the use of irrigation for the replacement trees, any repairs needed for the irrigation system, any vegetation management that has been completed or is recommended, and the survival rate of all replacement trees. If any trees fail within the first 3 years after planting, the city shall replace those trees on site and monitor the newly planted trees for a total of 3 years from the date of planting, unless other success criteria is established in a replanting plan that meets the requirements of Section 106.39.060.C of the City of Citrus Heights Municipal Code and the County's required measures in Sections 19.12.130, 19.12.140, 19.12.150, and 19.12.160.

The changes to the mitigation measure will avoid or reduce the impact to at least the same degree as, or to a greater degree than, the original measures and will create no more adverse effect of its own than would have the original measure

Impacts to Eco Systems and Non-Protected Species:

Comment Summary: Concerns regarding the Project's potential impacts on species that are not protected by state or federal regulations and the potential for the trail to impact a broader ecosystem.

Response: CEQA requires the city to evaluate the potential impacts of a project on species protected by either the CDFW or the US Fish and Wildlife Service.

The IS/MND evaluates the potential for these protected species to exist within the trail area. Several of these protected species have the potential to exist near the trail and a few were identified to exist within the trail area.

The IS/MND includes five mitigation measures to reduce the impact to these species to less than significant levels. These mitigation measures require preconstruction surveys to determine if the sensitive species are located within the vicinity of the trail. If species are present, protocols would be in place to either delay construction (in the case of nesting birds), establish a buffer, or follow best practices for the relocation or avoidance options based on consultation with the regulatory agencies. CDFW commented on several of these mitigation measures and the measures have been revised to reflect their recommendations to further mitigate any potential impacts to protected plant or wildlife species.

The proposed trail alignment generally follows an existing informal trail network. The proposed trail alignment is located entirely within an urban environment developed with roadway systems, residential and commercial uses, as well as existing recreational facilities. The existing ecosystem currently intact is one that can exist within a generally urbanized environment

Subject: Electric Greenway Trail Project – Adoption of Initial Study/Mitigated Negative Declaration Date: June 27, 2019 Page 13 of 15

characterized by the available landscaped habitats, on-going maintenance activities, and traffic volumes.

Although the presence of a few natural communities exists within the confines of the Project area, the proposed trail alignment minimizes disturbance of identified natural communities to the extent feasible and will replace trees that provide habitat as required by the city and county tree ordinances. Further, the trail would remove several fences currently impeding the trail corridor and fences will not otherwise be constructed where they would obstruct the movement of any wildlife species in the vicinity. It is not anticipated that implementation of the Project will have a permanent adverse impact on the existing ecosystem. No changes to the IS/MND are necessary as a result of this comment.

General Public Outreach/Comments

Implementing the city's vision for trails within Citrus Heights has been a multi-year effort including numerous interrelated projects and affiliated outreach efforts. Significant feedback has been incorporated into each prior project which ultimately led up to the prioritization and implementation of the Electric Greenway Trail Project.

Prior Outreach

In 2013-2014, as part of the Creek Corridor Trail Feasibility Study, significant public outreach was conducted to solicit feedback. Over 40 public meetings and workshops were conducted over the course of a year focused on determining which trail segments were feasible, soliciting community feedback, and prioritizing trail segments.

This process culminated with City Council adoption of the Creek Corridor Trail Feasibility Report in 2014. At that time, City Council directed staff to incorporate the Priority 1 trail segments (highest priority) into the city's regulatory documents (General Plan, Bikeway Master Plan, and Pedestrian Master Plan). In 2015 the City Council adopted the Bikeway Master Plan and General Plan Bikeway Map (including the Electric Greenway Trail alignment) as well as the associated IS/MND.

In 2016, after a significant community outreach and engagement process, the city adopted the Pedestrian Master Plan and associated IS/MND including the Electric Greenway Trail alignment.

Electric Greenway Trail Project Specific Outreach and Engagement

Public outreach and engagement for the Project has taken several forms. All residents who live within 1000' of either a park through which the trail is proposed, or from the trail itself (whichever is greater) have been notified of all of community meetings and workshops; residents outside this area who attended meetings or contacted the city with Project questions or comments, were also added to the project mailing list and e-mail list.

The Project's website has been continuously updated to include information about the Project including the development plans and handouts from the community meetings. In addition, a

robust Frequently Asked Question list has been continuously updated on the Project website. The Project has been the subject of articles in the both the *Citrus Heights Sentinel* and *Citrus Heights Messenger*. The project was also discussed at SRPD Board meetings, City Council meetings, neighborhood meetings, and on multiple public social media platforms.

The following meetings/workshops have been held on this project:

September 20, 2018:	SRPD Board Meeting. A presentation was given by SRPD staff at the Board meeting regarding the Project.
December 13, 2018:	City staff presented an update on the Electric Greenway Trail Project at the regularly scheduled City Council Meeting. Information on the upcoming Open House was included.
January 8, 2019:	The project partners hosted an Open House to inform the community and solicit feedback and comments regarding the Project. The summary for this meeting is provided as Attachment 4.
February 19, 2019:	Neighborhood Area (NA) 7/8 Meeting. City staff presented the project, answered questions and solicited feedback during the NA 7/8 meeting.
March 25, 2019:	NA 10 Meeting. City staff presented an update on the project and was available to answer questions and receive comment at the NA 10 meeting.
April 2, 2019:	Claypool/Olivine Neighbor Meeting. The city hosted a meeting with the residents living along Olivine Avenue and Claypool Way between Oak Avenue and Wachtel Way. This meeting was to address specific concerns and answer questions regarding this portion of the trail. Owners and residents of 13 properties attended the meeting. The primary items discussed at the meeting included fencing responsibility, backyard access, trail width and use, and trail liability.
April 10, 2019:	Individual letters were mailed to all property owners on Claypool Way and Olivine Avenue adjacent to the trail, offering to meet and discuss the Project as it specifically related to their properties. Engineering, Planning and Police Department Staff were available to answer and address any questions. One property owner set up a meeting and met with staff.
May 8, 2019:	NA9 Meeting. City staff presented the project, answered questions and solicited feedback during the NA 9 meeting. At the end of the meeting, NA9 stated it is in support of the Project.
May 21, 2019:	The Project partners hosted a second Open House to inform the community and solicit feedback and comments regarding the Project. In addition, copies of the draft IS/MND were available for review

Subject: Electric Greenway Trail Project – Adoption of Initial Study/Mitigated Negative Declaration Date: June 27, 2019 Page 15 of 15

	and the Project environmental team was present to answer questions. The summary for this meeting is provided as Attachment 5.
May 21 - June 4, 2019:	The Project partners hosted a Virtual Community Workshop (VCW). The VCW provided community members an opportunity to learn about and provide input on various Project specifics including design aesthetics, potential locations and type of trail lighting, etc. Laptops and paper copies were available at the May 21 st Open House for those who wanted to participate at the meeting. The summary for the VCW is included in Attachment 6.

Many of the attached summaries also provide comments from attendees, either made orally during the meeting or provided on "comment cards" that were available at several of the meetings. Other letters regarding the project have been included as Attachment 9.

Next Steps

Following adoption of the IS/MND, staff will continue the detailed engineering necessary to move the project to construction. This will include continued outreach and communication with property owners adjacent to the Electric Greenway as well as the broader community.

Attachments

- 1. Resolution No. 2019-_____ a Resolution of the City Council of the City of Citrus Heights, adopting the Citrus Heights Electric Greenway Trail Initial Study/Mitigated Negative Declaration and Mitigation Monitoring Plan.
 - a. Electric Greenway Trail Project Initial Study/Mitigated Negative Declaration
 - b. Electric Greenway Trail Project Mitigation Monitoring Plan
- 2. Electric Greenway Overview Map
- 3. Bikeway Master Plan and General Plan Bikeway Map IS/MND
- 4. January 8, 2019 Open House Summary
- 5. May 21, 2019 Open House Summary
- 6. Virtual Public Workshop Summary
- 7. Regional Bikeway Map
- 8. Comments on IS/MND
- 9. Other Letters