



ECOS

ENVIRONMENTAL
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OF SACRAMENTO

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SUBJECT: Comments on Innovation Park and CNU Medical Center Project DEIR

Thank you for the opportunity to comment on this major project in North Natomas. We are pleased to see the reuse of the Arco Arena site. A hospital would address a long standing problem of having no hospital and few medical services north of the river in the City limits. All 24-hour emergency rooms are over 25 minutes away from residents of Natomas and North Sacramento. The land use designations are acceptable but more detail will be needed to fully understand the impacts given the wide range of densities that are allowed by the city. Impacts could vary significantly in terms of traffic, schools, parks and others. Further, it is still unclear what kind of “innovation” is anticipated in the area identified as Innovation Park.

The following suggestions relate to the Summary of the Project.

1) Objectives 7 and 11 need to be expanded:

7 - Add staff housing for those employees who will be in entry level and low paying jobs (such as housekeeping, nurses aides, maintenance, etc.) who will need “affordable” housing or face long commutes.

#11 - Add “including parks and recreation, and dedicated habitat areas.” (This also refers to Parks and Open Space on 2.4.5)

2) The discussion regarding parks must be adjusted to reflect the reality of the situation, in order to meet park land obligations and must be reviewed by City Parks staff to assure compliance with city policies. Also the charts on S 9-10 and 2.4.5 refer to 24 acres of parks, which is unrealistic for the following reasons.

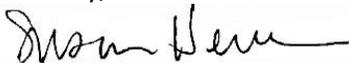
- .8 acre plaza - This can only be considered “park” if the design meets the criteria and approval of city parks. There are many plazas in the office parks in South Natomas, and some are just concrete with maybe a few benches or planters and are really intended for the employees to use. Parks should be open to everyone, and serve a more recreational use, not just for employees’ breaks. The city’s criteria for parks is to serve residents not employees.
- 4 acre nature park is existing habitat, and can’t be considered a park since description says the public will have access from all sides, clearly impacting the viability of the area supporting wildlife. Plus the chart on 4.3.1 shows the riparian/wetland area as 6.38 acres. Therefore, 6.38 acres is the minimum nature area, and additional acreage will be needed to allow residents to use the exterior area as a park.

- 5.7 acres adjacent to bikeway is landscaping, not a park, and can't be counted unless park areas are established along the route for recreation uses.
 - 4.4 acres of sports fields at school cannot be counted as parks since neither access nor joint use is allowed by NUSD after schools are closed
 - 9.1 areas of public access /open space are outdoor amenities but not parkland, unless the design, access and use are deemed recreational by staff
- 3) In S-14 please consider adding the following projects to the proposal:
- A clinic on Northgate Blvd in South Natomas to serve the adjacent underserved communities of Northgate and Gardenland
 - A convalescent hospital or rehab facility to meet undeserved demand in the area
 - Affordable housing for staff to reduce traffic congestion and air quality impacts of lengthy commutes, in addition, housing for students and faculty; dormitories, studios, etc.
 - The feasibility of basement uses should be carefully considered given high ground water and flood risk
 - For landscaping, we request that you save as many mature trees as possible and add native oaks where possible to support the highest potential carbon sequestration and habitat; use native plants and shrubs that do not need shearing or regular trimming, to reduce air quality impacts.
- 4) S-41 It's not clear how the loss of 41.83 areas of habitat and 6.3 acres of wetlands be mitigated? One suggestion is to enlarge the 4 acre "nature park" to include all 6.83 acres that exist, and buffer that with additional acreage to allow for human visitors.
- 5) 4.3 - 42 - NBHCP - Why was the site exempted from Natomas Basin Conservancy (NBC) fees and not asked to pay their fair share? Since approval is needed from the USFWS and CDFW, additional mitigation would be required to make up the loss, working with the NBC.
- 6) 4.9.4-10 Parks and habitat - please see comments above.
- 7) 4.10 - Transportation and Circulation. Traffic in South Natomas will be impacted by this use, as it was from the Arena. The internal intersections of Truxel and San Juan, San Juan and Northgate, and San Juan and Azevedo need to be studied for impacts and mitigation measures. As the closest hospital and major employer, many residents of South Natomas will travel on these streets to reach the site for services or jobs.

If the Medical Center goes forward it will be a major transit hub, perhaps more important than the Airport. We suggest either it be located closer to Truxel (swapped with the housing) or the light rail alignment be diverted from Truxel to run on the new road between the Medical Center and the housing.

Thank you for considering our comments.

Sincerely,



Susan Herre
President of the ECOS Board