

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



Established in 1938

JENNIFER LUCCHESI, *Executive Officer*
(916) 574-1800 Fax (916) 574-1810
California Relay Service TDD Phone 1-800-735-2929
from Voice Phone 1-800-735-2922

Governor's Office of Planning & Research

August 23 2021

Contact Phone: (916) 574-1890

STATE CLEARINGHOUSE

August 23, 2021

File Ref: SCH # 2017072019

City of West Sacramento
Jason McCoy, Supervising Transportation Planner
Capital Projects and Transportation Department
1110 West Capitol Avenue, 1st Floor
West Sacramento, CA 95691

VIA ELECTRONIC MAIL ONLY (mccoyj@cityofwestsacramento.org)

Subject: Draft Environmental Impact Report/Environmental Assessment (EIR) for the Broadway Bridge, Yolo and Sacramento Counties

Dear Jason McCoy:

The California State Lands Commission (Commission) staff has reviewed EIR for the Broadway Bridge (Project), which is being prepared by the City of West Sacramento (City) and the California Department of Transportation (Caltrans). The City, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.), and Caltrans is the lead agency under the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.). The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land, the Commission will act as a responsible agency.

For description of Commission jurisdiction and Public Trust lands, please see the attached August 10, 2017, staff comment letter on the Notice of Preparation.

Environmental Review

We appreciate you addressing many of our comments from the August 10, 2017, letter in the EIR (attached; page 4-1 of EIR). Staff requests that the City also consider the following outstanding comments to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the EIR when considering a future lease application for the Project.

General Comments

1. Project Description: Please provide the following details for staff to better analyze possible environmental impacts from the Project for lands under the Commission's jurisdiction in the Sacramento River (River):
 - A. Add more illustrations showing all proposed work within the Commission's jurisdiction (EIR page 2.2.2-10), including any land acquisitions and easements adjacent to the River that could affect public access.
 - B. Add more details such as the number and size of bridge support structures in the River (page 3-72), the frequency and volume of dredging, and the number and duration of barges that would be used for construction work.

Aesthetics

2. Scenic Impacts: The EIR on page 2.1.8-3 states "Views of the [P]roject from Business I-80/US 50 [Pioneer Bridge], within this VAU [visual assessment unit], are not readily available except on close approach to the border of the River VAU." Even though the EIR analysis suggests that the bridge would not be visible to drivers on the Pioneer Bridge, it would be visible as see in Figure 2.1.8-3. Page 1-11 states that the new bridge would be at the same elevation as the Pioneer Bridge. Therefore, the new bridge would be visible to drivers on Pioneer Bridge. Please see the attached letter explaining why views from the Pioneer Bridge are important.

Biological Resources

3. Underwater Noise: The analysis on page 2.3.3-14 should also explain the following for pile driving, installing the coffer dam, dredging, welding, and installing support tower foundations:
 - A. How underwater noise levels would be measured and kept within the recommended thresholds?
 - B. How noise and vibration from in-water construction would impact fish and birds?

Climate Change

4. Sea-Level Rise: The EIR should discuss the effects of sea-level rise on all resource categories potentially affected by the Project. Because of their nature and location, these lands and resources are already vulnerable to a range of natural events, such as storms and extreme high tides. Please see attached letter for more details.

Cultural Resources

5. Title to Resources Within Commission Jurisdiction: Even though it is stated on page 2.1.9-3 that the Commission shipwreck database was searched and mitigation measure CUL-2 (page 2.1.9-10) was set in place to avoid cultural resources, the EIR should also include the following statement in mitigation measure CUL-2 (Please see attached letter for more details):

“The final disposition of archaeological, historical, and paleontological resources recovered on State land under the jurisdiction of the California State Lands Commission must be approved by the Commission.”

Hydrology/Water Quality

6. Mercury/Methylmercury: The EIR analysis on page 2.2.2-9 should further discuss measures of how mercury would be avoided and minimized. Please see the attached letter for more details.
7. Floodplain Encroachment: Please see the attached letter for why considering floodplain encroachment is important for this Project. Staff recommends that additional analysis be added to page 2.2.1-3 of the local and regional significance of this impact and the potential impact on existing flood management systems and facilities. The City is encouraged to work with the Central Valley Flood Control Board and other flood management entities on appropriate design, construction, and siting of bridge support structures within the floodplain of the River, including construction activities affecting existing levees. (Please see the “Navigation” section below for related discussion.)

Navigation

8. Navigation Impediments: Please see the attached letter for why navigation impediments are expected. The Project has the potential to contribute to these types of navigation impacts on the River. A mitigation approach to offset the navigation impacts of the Project could include removal of other existing derelict structures (abandoned pilings, outfall pipelines, piers, floating docks, abandoned vessels, artificial debris, etc.) and navigation hazards in the surrounding Project vicinity of the River. To the extent feasible, the footings and support towers for the bridge should be designed to minimize navigation impacts, and the bridge deck should be elevated to avoid disruption of navigation by smaller vessels during high flood stage events, when the River is at or near full capacity.

Noise

9. Operational Noise: The long-term operation of the Project will introduce a range of new noise sources to the Sacramento River. Although the Project will be relatively close to the Pioneer Bridge, the Broadway Bridge will likely have a bridge deck of lower elevation to the River, like the Tower and I Street Bridges, which connect surface streets on both sides of the River. The EIR should evaluate the impacts of these noise sources on River recreation and uses, and if potentially significant, provide mitigation measures to offset impacts. New noise impact considerations include, but are not limited to:
 - A. Use of a siren or other amplified noise to operate the moveable span of the bridge for vessel navigation
 - B. Noise associated with operation of a public transit streetcar
 - C. Noise from automobiles and emergency service vehicles

Recreation

10. Public Access: Even though page 2.1.3-3 states that “in-water work would not interfere with recreational or commercial boaters using the Sacramento Marina,” please provide a detailed description of any proposed closures or restricted areas in the River that could impact kayakers, boaters, and emergency response service providers passing through the River. Potential mitigation measures could include public notices and posting of signs (at local launching sites) and email notifications to local recreating groups, so they are informed of any temporary access restrictions.

Thank you for the opportunity to comment on the EIR for the Project. As a responsible and trustee agency, the Commission will need to rely on the certified EIR for issuing any amended/new lease as specified in the attached letter. We request that you consider our comments before certifying the Final EIR. Commission staff also requests that you consult with us on the Project and keep us advised of changes to the Project Description and all other important developments.

Please send electronic copies of the Certified EIR, Mitigation and Monitoring Program, Notice of Determination, approving resolution, CEQA Findings, and, if applicable, Statement of Overriding Considerations when they become available. Refer questions concerning environmental review to Afifa Awan, Senior Environmental Scientist, at Afifa.Awan@slc.ca.gov or (916) 574-1891. For questions concerning archaeological or historic resources under Commission jurisdiction, please contact Jamie Garrett, Staff Counsel, at Jamie.Garrett@slc.ca.gov or (916) 574-0398. For questions concerning Commission leasing jurisdiction, please contact Mary Jo Columbus, Public Land Management Specialist, at MaryJo.Columbus@slc.ca.gov or (916) 574-0204.

Sincerely,



Nicole Dobroski, Chief
Division of Environmental Planning
and Management

cc: Office of Planning and Research
M.J. Columbus, Commission
J. Fabel, Commission
J. Garrett, Commission

Attachment:

State Lands Commission August 10, 2017, Comment Letter Submitted for the
Notice of Preparation

CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



Established in 1938

JENNIFER LUCCHESI, Executive Officer
(916) 574-1800 Fax (916) 574-1810
California Relay Service TDD Phone 1-800-735-2929
from Voice Phone 1-800-735-2922

Contact Phone: (916) 574-1890

Contact FAX: (916) 574-1885

August 10, 2017

File Ref: SCH # 2017072019

Jason McCoy
City of West Sacramento
Public Works Department
1110 West Capitol Avenue
West Sacramento, CA 95691

**Subject: Notice of Preparation (NOP) for an Environmental Impact
Statement/Environmental Impact Report (EIS/EIR) for the Broadway
Bridge (Project), Yolo and Sacramento Counties**

Dear Mr. McCoy:

The California State Lands Commission (Commission) staff has reviewed the subject NOP for the EIS/EIR for the Broadway Bridge (Project), which is being prepared by the City of West Sacramento (City) and the California Department of Transportation (Caltrans). The City, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.), and Caltrans is the lead agency under the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.). The Commission is a trustee agency for projects that could directly or indirectly affect sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on sovereign land, the Commission will act as a responsible agency. Commission staff requests that the City consult with us on preparation of the Draft EIR as required by CEQA section 21153, subdivision (a), and the State CEQA Guidelines section 15086, subdivisions (a)(1) and (a)(2).

Commission Jurisdiction and Public Trust Lands

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged land legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The state holds these lands for the benefit of all people of the state for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line (MHTL), except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court of proper jurisdiction. On navigable non-tidal waterways, including lakes, the state holds fee ownership of the bed of the waterway landward to the ordinary low-water mark and a Public Trust easement landward to the ordinary high-water mark, except where the boundary has been fixed by agreement or a court of proper jurisdiction. Such boundaries may not be readily apparent from present day site inspections.

Based upon the information provided and a preliminary review of our records, the portion of the proposed Project crossing the Sacramento River will be located on State sovereign land under the jurisdiction of the Commission. A lease for the use of sovereign land will be required from the Commission for any portion of the Project encroaching on State sovereign land. In 2000, the Commission authorized Telephone Right-of-Way Permit No. PRC 8156.9 and an amendment of the permit to Level 3 Communications, LLC. The permit authorizes operation and maintenance of a fiber optic cable crossing the Sacramento River at the subject site.

Promotion of public access to and use of California's navigable waters is a mandate of the California Constitution (art. X, § 4), a condition of statehood in the Act of Admission (9 Stat. 452), and a responsibility of public agencies pursuant to the Public Trust Doctrine. In this case, the Legislature has provided for a process to be followed to facilitate and maintain public access to navigable rivers at bridge sites pursuant to California Streets and Highways Code section 1809. During the design hearing process, and prior to Commission consideration of approval of a bridge project, the City is required to fully consider, and prepare a report on, the feasibility of providing public access to the Sacramento River for recreational purposes, and determine if such public access will be provided.

Project Description

The City, in cooperation with Caltrans and the City of Sacramento (as a responsible agency), proposes to construct a new bridge over the Sacramento River downstream of the U.S. 50 Pioneer Bridge, connecting South River Road and 15th Street to the Broadway corridor. Several bridge alignment alternatives are being considered as part of the Project. The new bridge will be moveable to allow boat passage and will carry vehicular, bicycle, and pedestrian traffic, and accommodate future transit options, including a future streetcar alignment within the bridge itself. The Project also includes installation of a bridge interconnect fiber optic line to allow the new bridge, and I Street and Tower Bridges, to be operated by one system.

Environmental Review

Commission staff requests that the City consider the following comments when preparing the EIS/EIR.

General Comments

1. Project Description: A thorough and complete Project Description should be included in the EIS/EIR in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all allowable activities (e.g., types of equipment or methods that may be used, maximum area of impact or volume of sediment removed or disturbed, seasonal work windows, locations for material disposal, etc.), as well as the details of the timing and duration of activities. Thorough descriptions will facilitate Commission staff's determination of the extent and locations of its leasing jurisdiction, make for a more robust analysis of the work that may be performed, and minimize the potential that subsequent environmental analysis will be required. For example, the Project Description should:
 - explain with illustrations all proposed work below the MHTL of the river, including any land acquisitions and easements adjacent to the river that could affect public access
 - describe full construction details for all bridge support structures located in the river, including any dredging operations, pile driving, use of cofferdams, and use of barges
 - provide a detailed description of any proposed closures or restricted areas during construction operations for watercraft navigation on, and public access to, the river

Aesthetics

2. Scenic Impacts: The Broadway Bridge will have a substantial new visual presence within the river channel and to adjacent Sacramento and West Sacramento land uses. As such, the architectural style of the bridge is critically important and should attempt to serve as a future landmark of identity for both cities. Architectural elements, such as visual design, color, scale, orientation, and glare will need to be carefully selected to minimize scenic impacts. The EIS/EIR should include a visual simulation of the new bridge to illustrate the architectural style and how the bridge will fit in with the surrounding scenic character and corridor of the river.

The U.S. 50 Bridge provides prominent gateway views to the Sacramento River and the cities of Sacramento and West Sacramento, and serves the greatest capacity of automobiles as a U.S. highway in comparison to the other nearby bridges. The Broadway Bridge has potential to block views of the Sacramento River from the south side of the U.S. 50 Bridge. The EIS/EIR should analyze the location and elevation of the new bridge as viewed from the south side of the Highway 50 Bridge, to minimize impacts on views of the river corridor as an important scenic vista.

Biological Resources

3. Special-Status Species and Habitats: The EIS/EIR should disclose and analyze all potentially significant effects on sensitive species and habitats in and around the Project area, including special-status wildlife, fish, and plants, and if appropriate, identify feasible mitigation measures to reduce those impacts. The City should conduct queries of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) and U.S. Fish and Wildlife Service's (USFWS) Special Status Species Database to identify any special-status plant or wildlife species that may occur in the Project area. The EIS/EIR should also include a discussion on consultation with CDFW, USFWS, and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS), including any recommended mitigation measures, construction work windows, and potentially required permits identified by these agencies.
4. Invasive Species: One of the major stressors in California waterways is introduced species. Therefore, the EIS/EIR should consider the Project's potential to encourage the establishment or proliferation of aquatic invasive species (AIS) such as the quagga mussel, or other nonindigenous, invasive species including aquatic and terrestrial plants. For example, construction boats and barges brought in from long stays at distant projects may transport new species to the Project area via hull biofouling, wherein marine and aquatic organisms attach to and accumulate on the hull and other submerged parts of a vessel. If the analysis in the EIS/EIR finds potentially significant AIS impacts, possible mitigation could include contracting vessels and barges from nearby, or requiring contractors to perform a certain degree of hull-cleaning. The CDFW's Invasive Species Program could assist with this analysis as well as with the development of appropriate mitigation (information at www.dfg.ca.gov/invasives/).

In addition, in light of the recent decline of native pelagic organisms and in order to protect at-risk fish species, the EIS/EIR should examine if any elements of the Project (e.g., changes in bankside vegetative cover) would favor non-native fisheries within the Sacramento River and adjacent waterways.

5. Construction Noise: The EIS/EIR should also evaluate noise and vibration impacts on fish and birds from in-water construction and dredging activities. Activities of concern include, but are not limited to, pile driving, installation of a coffer dam, dredging, welding, installation of support tower foundations, etc. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and NMFS. Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

Climate Change

6. Greenhouse Gases: A greenhouse gas (GHG) emissions analysis consistent with the California Global Warming Solutions Act (Assembly Bill [AB] 32) and required by the State CEQA Guidelines should be included in the EIS/EIR. This analysis should identify a threshold for significance for GHG emissions, calculate the level of GHGs

that will be emitted as a result of construction and ultimate build-out of the Project, determine the significance of the impacts of those emissions, and, if impacts are significant, identify mitigation measures that would reduce them to the extent feasible. Please include a full evaluation of all the equipment that could be used for any aspect of the dredging activities. Please contact all the Air Quality Management Districts (AQMDs) with regulatory oversight and jurisdiction. Air basins will have different impacts and criteria for analysis based on attainment status. Air impact analysis models for identifying the impacts of the proposed Project should be discussed with the AQMDs.

7. Sea-Level Rise: A tremendous amount of state-owned lands and resources under the Commission's jurisdiction will be impacted by rising sea levels. With this in mind, the EIS/EIR should discuss the effects of sea-level rise on all resource categories potentially affected by the proposed Project. Because of their nature and location, these lands and resources are already vulnerable to a range of natural events, such as storms and extreme high tides. Note that the State of California released the final "Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy" (Safeguarding Plan) on July 31, 2014, to provide policy guidance for state decision-makers as part of continuing efforts to prepare for climate risks. The Safeguarding Plan sets forth "actions needed" to safeguard ocean and coastal ecosystems and resources as part of its policy recommendations for state decision-makers.

In addition, Governor Brown issued Executive Order B-30-15 in April 2015, which directs state government to fully implement the Safeguarding Plan and factor in climate change preparedness in planning and decision making. Please note that when considering lease applications, Commission staff will: (1) request information from applicants concerning the potential effects of sea-level rise on their proposed projects; (2) if applicable, require applicants to indicate how they plan to address sea-level rise and what adaptation strategies are planned during the projected life of their projects; and (3) where appropriate, recommend project modifications that would eliminate or reduce potentially adverse impacts from sea-level rise, including adverse impacts on public access. As the Project EIS/EIR is being developed, please consider Commission policy for the proposed Project and potential impacts on State sovereign land.

Cultural Resources

8. Submerged Resources: The EIS/EIR should evaluate potential impacts to submerged cultural resources in the Project area. The Commission maintains a shipwrecks database that can assist with this analysis. Commission staff requests that the City contact Staff Counsel Jamie Garrett (see contact information below) to obtain shipwrecks data from the database and Commission records for the Project site. The database includes known and potential vessels located on the State's tide and submerged lands; however, the locations of many shipwrecks remain unknown. Please note that any submerged archaeological site or submerged historic resource that has remained in state waters for more than 50 years is presumed to be significant. Because of this possibility, please add a mitigation measure requiring

that in the event cultural resources are discovered during any construction activities, Project personnel shall halt all activities in the immediate area and notify a qualified archaeologist to determine the appropriate course of action.

9. Title to Resources: The EIS/EIR should also mention that the title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the state and under the jurisdiction of the Commission (Pub. Resources Code, § 6313). Commission staff requests that the City consult with Staff Counsel Jamie Garrett, should any cultural resources on state lands be discovered during construction of the proposed Project.

Hydrology/Water Quality

10. Mercury/Methylmercury: The EIS/EIR study area includes the Sacramento River and adjacent lands within the cities of Sacramento and West Sacramento. Staff requests that the EIS/EIR include avoidance and minimization measures to reduce potential release from Project activities of mercury and other toxins into waterways and onto state lands underlying those waterways.

On April 22, 2010, the Central Valley Regional Water Quality Control Board (CVRWQCB) identified the Commission as both a state agency that manages open water areas in the Sacramento-San Joaquin Delta Estuary, and an agency that affects the transport of mercury and the production and transport of methylmercury (Resolution No. R5-2010-0043), because subsurface lands under the Commission's jurisdiction are impacted by mercury from legacy mining activities dating back to California's Gold Rush. Pursuant to a CVRWQCB Total Maximum Daily Load (TMDL), the CVRWQCB is requiring the Commission to fund studies to identify potential methylmercury control methods in the Delta and to participate in an Exposure Reduction Program. The goal of the studies are to evaluate existing control methods and evaluate options to reduce methylmercury in open waters under jurisdiction with the Commission. Any action taken that may result in mercury or methylmercury suspension within the Sacramento-San Joaquin Delta Estuary may affect the Commission's efforts to comply with the CVRWQCB TMDL.

11. Floodplain Encroachment: The construction of any new bridge support towers, armoring or debris protective structures, and footings within the river bed and waterward of levees will reduce floodplain volume for conveyance of floodwater. The EIS/EIR should analyze the local and regional significance of this impact, and the potential impact on existing flood management systems and facilities. The City is encouraged to work with the Central Valley Flood Control Board and other flood management entities on appropriate design, construction, and siting of bridge support structures within the floodplain of the river, including construction activities affecting existing levees. (Please see the Navigation section for related discussion.)

Navigation

12. Navigation Impediments: The Project involves construction of a new bridge within approximately 1 mile of three other existing bridges across the river (U.S. 50 Bridge,

Tower Bridge, and I Street Bridge). The Tower and I Street Bridges include moveable mid-section spans for passage of larger vessels, and these bridges can become an obstacle for navigation of smaller vessels during high flood stage events when the river is at or near full capacity. When heavy watercraft traffic is present on the river (i.e., summer weekends, holidays, prime fishing seasons, etc.), the in-water support towers for these bridges can pose navigation obstacles, resulting in constrained navigation. The support towers for these bridges also accumulate large woody debris and sedimentation (and everything else that can get caught in the debris piles), which can be a hazard for navigation and snag vessel anchors on the river bottom. Periodic maintenance is required to remove accumulated debris and maintain protective structures for the bridge towers (i.e., Tower Bridge Fender Replacement Project).

The Broadway Bridge has the potential to contribute to these types of navigation impacts on the river. A mitigation approach to offset the navigation impacts of the Project, could include removal of other existing derelict structures and navigation hazards in the surrounding project vicinity of the river. Derelict structures in the Project vicinity could include abandoned pilings, outfall pipelines, piers, floating docks, abandoned vessels, artificial debris, etc.

To the extent feasible, the footings and support towers for the bridge should be designed to minimize navigation impacts, and the bridge deck should be elevated to avoid disruption of navigation by smaller vessels during high flood stage events, when the river is at or near full capacity. The City is encouraged to provide this analysis in the EIS/EIR.

Noise

13. Operational Noise: The long-term operations of the Project will introduce a range of new noise sources to the Sacramento River. Although the Project will be relatively close to the U.S. 50 Bridge, the Broadway Bridge will likely have a bridge deck of lower elevation to the river, similar to the Tower and I Street Bridges, which connect surface streets on both sides of the river. The EIS/EIR should evaluate the impacts of these noise sources on river recreation and uses, and if potentially significant, provide mitigation measures to offset impacts. New noise impact considerations include, but are not limited to:

- Use of a siren or other amplified noise to operate the moveable span of the bridge for vessel navigation
- Noise associated with operation of a public transit streetcar
- Noise from automobiles and emergency service vehicles

Recreation

14. Public Access: For all construction phases of the Project, the EIS/EIR should provide a detailed description of any temporary restrictions on public access from the land side of the river, and for navigation within the river, including for emergency response service providers. Potential mitigation measures could include public notices and posting of signs to inform the public of temporary access restrictions.

Cumulative Impacts

15. Cumulative Impacts: The EIS/EIR should consider the cumulative impacts of other past, present, and probable future projects that could contribute to impacts generated by the Project. Such projects may include the Tower Bridge Fender Replacement project and the Southport Sacramento River Early Implementation Project.

Mitigation and Alternatives

16. Deferred Mitigation: In order to avoid the improper deferral of mitigation, mitigation measures should either be presented as specific, feasible, enforceable obligations, or should be presented as formulas containing "performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way" (State CEQA Guidelines, §15126.4, subd. (a)).

17. Alternatives: In addition to describing mitigation measures that would avoid or reduce the potentially significant impacts of the Project, the City should identify and analyze a range of reasonable alternatives to the proposed Project that would attain most of the Project objectives, while avoiding or reducing one or more of the potentially significant impacts (see State CEQA Guidelines, § 15126.6).

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and responsible agency, Commission staff requests that you consult with us on this Project and keep us advised of changes to the Project Description and all other important developments. Please send additional information on the Project to the Commission staff listed below as the EIS/EIR is being prepared.

Please refer questions concerning environmental review to Jason Ramos, Senior Environmental Scientist, at (916) 574-1814 or via e-mail at Jason.Ramos@slc.ca.gov. For questions concerning archaeological or historic resources under Commission jurisdiction, please contact Staff Counsel Jamie Garrett at (916) 574-0398 or via e-mail at Jamie.Garrett@slc.ca.gov. For questions concerning Commission leasing jurisdiction, please contact Mary Jo Columbus, Public Land Management Specialist, at (916) 574-0204 or via e-mail at MaryJo.Columbus@slc.ca.gov.

Sincerely,



Cy R. Oggins, Chief
Division of Environmental Planning
and Management

cc: Office of Planning and Research
J. Ramos, Commission
M. Columbus, Commission
J. Garrett, Commission