Station E
Substation Project

Final Initial Study and Mitigated Negative Declaration • March 2014
Station E Substation Project

Final
Initial Study and Mitigated Negative Declaration

Lead Agency:
Sacramento Municipal Utility District
6201 S Street, MS B203
Sacramento, CA 95817-1899
or
P.O. Box 15830 MS B203
Sacramento, CA 95852-1830
Attn: Jose Bodipo-Memba, Environmental Management Specialist
(916) 732-6493 or Jose.Bodipo-Memba@SMUD.org

SCH# 2014012007
Introduction

Sacramento Municipal Utility District (SMUD) proposes the Station E Substation Project (also referred to as “the Proposed Project”) to replace the existing North City Substation. This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to evaluate the environmental effects of SMUD’s Proposed Project for compliance under the California Environmental Quality Act (CEQA). SMUD is the lead agency responsible for CEQA compliance.

Project Description

SMUD proposes to develop the Station E Substation Project (Proposed Project), located in the City of Sacramento (Assessor Parcel Numbers 003-0032-027-0000 and 003-0032-028-0000) in Sacramento County, California. The Proposed Project consists of installing a new substation with overhead and underground utility lines, steel structures, and electrical equipment to replace an existing substation. The Proposed Project would replace the existing North City Substation, which was constructed in the 1950s and has reached its planned operational end of life.

SMUD is proposing to replace the existing North City Substation with the new Station E Substation to improve operational reliability. Replacing the substation at an adjacent site allows construction of the new Station E Substation to occur while maintaining electrical service from the existing North City Substation. The Proposed Project would meet SMUD’s performance objectives by locating the substation near the load center of the existing service area.

Findings

As the CEQA lead agency, SMUD finds that the construction and operation of the Proposed Project would not cause a significant adverse impact on the environment with implementation of identified mitigation measures for potentially significant impacts to air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, and hydrology and water quality. A Mitigation Monitoring and Reporting Plan is provided in Appendix A in the IS/MND that summarizes the identified mitigation measures.

Cumulative Impacts

CEQA requires that SMUD assess whether its Proposed Project’s incremental effects are significant when viewed in connection with the effects of other projects. Based on the analysis presented in this IS/MND, the Proposed Project would not contribute significantly to considerable environmental changes when considered in combination with other past, present, or planned projects in the vicinity. The environmental effects of the Proposed Project were determined to be less than significant or would be less than significant with mitigation incorporated. The Proposed Project is also located in a developed area with few other planned, proposed, or recently completed projects in the vicinity with effects that, with the Proposed Project, would contribute to cumulatively considerable impacts.
Growth-Inducing Impacts

A project is defined as growth inducing when its development directly or indirectly triggers population growth within a region. SMUD’s Strategic Directive Four requires that the ability to meet its customer’s energy requirements in a reliable and safe manner remains a core value. SMUD exists as a public agency to supply electrical energy to customers in the Sacramento area in response to regional growth projections. It has an obligation to serve existing and new development approved by the local agencies and jurisdictions within its service area, which includes most of Sacramento County. SMUD does not designate where and what new development may occur. Consequently, when SMUD plans or proposes additional service capacity, it is to accommodate development or growth that has been previously reviewed and approved by cities or counties in its service territory. Therefore, development of the Station E Substation would be considered growth accommodating rather than growth inducing.

Determination

On the basis of this evaluation, SMUD concludes:

a. The Proposed Project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered species, or eliminate important examples of the major periods of California history or prehistory.

b. The Proposed Project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.

c. The Proposed Project would not have impacts that are individually limited, but cumulatively considerable.

d. The Proposed Project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

e. No substantial evidence exists to demonstrate that the Proposed Project would have a substantive negative effect on the environment.
This IS/MND has been prepared to provide the opportunity for interested agencies and the public to provide comment. The public comment period was open from January 3, 2014 through February 3, 2014. One public meeting was held in the SMUD Headquarters Building on January 27, 2014. Six comment letters were received during the comment period. Pending SMUD Board approval, this IS/MND will be filed with the Sacramento County Clerk and the Office of Planning and Research pursuant to CEQA Guidelines §15075.
# TABLE OF CONTENTS

**1.0 INTRODUCTION**

- 1.1 Review of the Draft IS/MND .................................................... 1-1
- 1.2 Preparation of the Final IS/MND .............................................. 1-1
- 1.3 CEQA Guidelines ..................................................................... 1-2
- 1.4 Analysis .................................................................................. 1-2

**2.0 COMMENTS AND RESPONSES**

- 2.1 Letter 1, Amy Kennedy, California Department of Fish & Wildlife (CDFW), January 24, 2014 ........................................... 2-2
  - 2.1.1 Comment 1-1 .................................................................... 2-3
  - 2.1.2 Response 1-1 ................................................................... 2-3
  - 2.1.3 Comment 1-2 ................................................................... 2-4
  - 2.1.4 Response 1-2 ................................................................... 2-4
  - 2.1.5 Comment 1-3 ................................................................... 2-4
  - 2.1.6 Response 1-3 ................................................................... 2-4
  - 2.1.7 Comment 1-4 ................................................................... 2-6
  - 2.1.8 Response 1-4 ................................................................... 2-6
  - 2.1.9 Comment 1-5 ................................................................... 2-7
  - 2.1.10 Response 1-5 .................................................................. 2-7
  - 2.1.11 Comment 1-6 ................................................................... 2-7
  - 2.1.12 Response 1-6 ................................................................... 2-7

- 2.2 Letter 2, Tracey Frost, California Department of Transportation, (Caltrans), February 3, 2014 ........................................ 2-8
  - 2.2.1 Comment 2-1 .................................................................... 2-11
  - 2.2.2 Response 2-1 ................................................................... 2-11
  - 2.2.3 Comment 2-2 ................................................................... 2-11
  - 2.2.4 Response 2-2 ................................................................... 2-11
  - 2.2.5 Comment 2-3 ................................................................... 2-11
  - 2.2.6 Response 2-3 ................................................................... 2-11
  - 2.2.7 Comment 2-4 ................................................................... 2-12
  - 2.2.8 Response 2-4 ................................................................... 2-12
  - 2.2.9 Comment 2-5 ................................................................... 2-12
  - 2.2.10 Response 2-5 ................................................................... 2-12

- 2.3 Letter 3, Scott Morgan, Governor’s Office of Planning and Research, State Clearinghouse February 4, 2014 ...................... 2-13
  - 2.3.1 Comment 3-1 .................................................................... 2-14
  - 2.3.2 Response 3-1 ................................................................... 2-14

- 2.4 Letter 4, Trevor Cleak, Central Valley Regional Water Quality Control Board (CVRWQCB), January 31, 2014 ...................... 2-15
  - 2.4.1 Comment 4-1 .................................................................... 2-18
  - 2.4.2 Response 4-1 .................................................................... 2-18
2.4.3 Comment 4-2 ................................................................. 2-18
2.4.4 Response 4-2 .............................................................. 2-18
2.4.5 Comment 4-3 .............................................................. 2-19
2.4.6 Response 4-3 .............................................................. 2-19
2.4.7 Comment 4-4 .............................................................. 2-19
2.4.8 Response 4-4 .............................................................. 2-19
2.4.9 Comment 4-5 .............................................................. 2-19
2.4.10 Response 4-5 ............................................................. 2-19
2.4.11 Comment 4-6 ............................................................ 2-20
2.4.12 Response 4-6 ............................................................ 2-20
2.4.13 Comment 4-7 ............................................................ 2-20
2.4.14 Response 4-7 ............................................................ 2-20

2.5 Letter 5, King Tunson, Sacramento Fire Department
(CVRWQCB), February 2, 2014 .................................................. 2-20
2.5.1 Comment 5-1 ............................................................... 2-21
2.5.2 Response 5-1 ............................................................... 2-21

2.6 Letter 6, Mr. and Mrs. Robert Sewell, Residents, January 7,
2014 ...................................................................................... 2-21
2.6.1 Comment 6-1 ............................................................... 2-21
2.6.2 Response 6-1 ............................................................... 2-21

2.7 References ........................................................................ 2-22

Appending Information

Appendix A Mitigation Monitoring and Reporting Program (MMRP)
Appendix B Station E Substation Project Final
Initial Study and Mitigated Negative Declaration (with Text Edits)
(on CD-ROM)
1.0 INTRODUCTION

1.1 Review of the Draft IS/MND

Copies of the Draft IS/MND were distributed to the Governor’s Office of Planning and Research, State Clearinghouse, local libraries, the County of Sacramento, and the appropriate resource agencies. A Notice of Intent (NOI) was distributed to property owners and occupants of record identified by the Sacramento County Assessor’s office within 500 feet of the project boundaries. The 30-day public review period began on January 3, 2014 and ended on February 3, 2014. Six comment letters were received. These letters are presented in Section 2.0, below. The comments did not change the conclusions presented in the Draft IS/MND.

1.2 Preparation of the Final IS/MND

Comment letters were reviewed and the responses were prepared (see Section 2.0). Based on the comments and recommendations received, minor changes and edits have been made to the text of the IS/MND. These section and page number of the revisions are noted in the responses to comments. Text changes are shown in underline and strikeout mode in the IS/MND, which is provided in Appendix B (in PDF format on CD in the envelope at the back of this document).

Text changes include Section 2.6, Permits and Approvals (page 2-19), the requirement to obtain a Conditional Use Permit from the City of Sacramento, and Section 3.4, Biological Resources, in the Regulatory Setting and Impacts and Mitigation Measures, discussions to describe the quality of the Proposed Project site’s natural habitat and the limited potential effects on Swainson’s hawk foraging habitat (see pages 3-35 to 3-37). A revision was made to Mitigation Measure BIO-2 on page 3-40 to clarify that preconstruction nesting bird surveys would also include surveys for burrowing owl. In Section 3.16, Transportation and Traffic, Tables 3-15 and 3-16 (pages 3-122 and 3-127, respectively) have been revised to include Caltrans’ State Route (SR) 160 average daily traffic (ADT) and peak hour traffic volumes and SR 160’s existing level of service (LOS) operation levels.

These minor changes and edits to the Draft IS/MND do not identify any new environmental effects or provide substantial project changes needed to reduce effects to below the level of significance, and therefore do not require recirculation per CEQA Guidelines §15073.5.

In addition, although the Project would have a less-than-significant impact on Swainson’s hawk foraging habitat and no impact on nesting sites, SMUD is proposing to extend its ongoing relationship with the California Raptor Center at University of California (UC) Davis and provide an additional $5,000 dollars per year for the next three years to aid in the assistance and rehabilitation of injured raptors, including Swainson’s hawk. This good faith act is consistent with SMUD’s environmental leadership policy. No new mitigation or impacts would be triggered as a result of this donation. As a result, no substantial changes to the Draft IS/MND would be required. Because this measure is not being adopted as a requirement of CEQA or to mitigate an avoidable significant effect, it does not require recirculation of this IS/MND under CEQA Guidelines §15073.5(c)(3).
1.3 **CEQA Guidelines**

CEQA Guidelines §15073.5 provides for recirculation of a negative declaration prior to adoption. §15073.5(a) states:

“A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given pursuant to §15072, but prior to adoption.”

According to §15073.5(b) a substantial revision is defined as:

“(1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or

(2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.”

Circumstances under which recirculation is not required include:

“(1) Mitigation measures are replaced with equal or more effective measures pursuant to §15074.1.

(2) New project revisions are added in response to written or verbal comments on the project’s effects identified in the proposed negative declaration which are not new avoidable significant effects.

(3) Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.

(4) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.” §15073.5(c).

Staff has determined that none of the aforementioned conditions have been met, and as a result, recirculation of the Draft IS/MND is not required. Therefore, SMUD as the Lead Agency may approve the Final IS/MND with the incorporated revisions.

1.4 **Analysis**

The Final IS/MND does not include changes to the Proposed Project description. The minor edits to the text in the IS/MND do not contain changes and/or additional details that warrant the recirculation of the Draft IS/MND because the changes do not result in any new impact not previously described and analyzed. These revisions do not meet the criteria for recirculation under CEQA Guidelines §15073.5.
SMUD has made the determination that the minor changes to the text of the IS/MND do not constitute a substantial revision as defined by §15073.5(b).

None of the provisions of §15073.5 apply to the proposed changes; therefore, recirculation of the Draft is not required. The changes to the biological resources and traffic sections are not considered ‘substantial revisions’ because these changes would not result in new, avoidable significant effects; and mitigation measures or project revisions are not required to reduce any effect to less than significant. Therefore, none of the situations described in CEQA Guidelines §15073.5 applies and the Draft IS/MND will not be recirculated.
## 2.0 COMMENTS AND RESPONSES

### Table 1. List of Commenters.

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Letter Number</th>
<th>Comment Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amy Kennedy</td>
<td>1</td>
<td>1-1 through 1-6</td>
</tr>
<tr>
<td>California Department of Fish &amp; Wildlife</td>
<td></td>
<td></td>
</tr>
<tr>
<td>January 24, 2014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tracey Frost, Interim Chief</td>
<td>2</td>
<td>2-1 through 2-5</td>
</tr>
<tr>
<td>California Department of Transportation (Caltrans)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>February 3, 2014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scott Morgan, Director</td>
<td>3</td>
<td>3-1</td>
</tr>
<tr>
<td>State Clearinghouse, Office of Planning and Research</td>
<td></td>
<td></td>
</tr>
<tr>
<td>February 4, 2014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trevor Cleak</td>
<td>4</td>
<td>4-1 through 4-7</td>
</tr>
<tr>
<td>Central Valley Regional Water Quality Control Board</td>
<td></td>
<td></td>
</tr>
<tr>
<td>January 31, 2014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>King Tunson</td>
<td>5</td>
<td>5-1</td>
</tr>
<tr>
<td>Supervisor, Plan Review, Fire Prevention</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sacramento Fire Department</td>
<td></td>
<td></td>
</tr>
<tr>
<td>February 2, 2014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr. and Mrs. Robert Sewell</td>
<td>6</td>
<td>6-1</td>
</tr>
<tr>
<td>Residents</td>
<td></td>
<td></td>
</tr>
<tr>
<td>January 7, 2014</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2.1 Letter 1, Amy Kennedy, California Department of Fish & Wildlife (CDFW), January 24, 2014

-----Original Message-----
From: Jose Bodipo-Memba [mailto:Jose.Bodipo-Memba@smud.org]
Sent: Friday, January 24, 2014 12:01 PM
To: Burwell, Trevor; Patrick Durham; Mike Deis; Amandeep Singh; Joyce Hribar
Subject: Fwd: MND Comments -Station E Substation Project

Trevor,

Attached are comments from the CDFG regarding Station E. Please review and let’s discuss the validity of their concerns on Monday. This is a bit of a surprise given URS’s findings in the MND. Please let me know your availability for a conference call on Monday morning.

Thanks,

Jose

Sent via the Samsung Galaxy S™ III, an AT&T 4G LTE smartphone

----- Original message ----- 
From: "Kennedy, Amy@Wildlife" <Amy.Kennedy@wildlife.ca.gov>
Date: 01/24/2014 10:14 AM (GMT-07:00)
To: Jose Bodipo-Memba <Jose.Bodipo-Memba@smud.org>
Cc: "Cashdollar, Shaundra@Wildlife" <Shaundra.Cashdollar@wildlife.ca.gov>
Subject: MND Comments -Station E Substation Project

January 24, 2014

Sacramento Municipal Utility District
Environmental Management
ATTN: Jose Bodipo-Memba
6201 S Street, MS 8203
Sacramento, CA 95817-1899

Dear Mr. Bodipo-Memba;

The California Department of Fish and Wildlife (Department) has reviewed the Sacramento Municipal Utility District’s (SMUD) Mitigated Negative Declaration (MND) for the State E Substation Project (Project) (SCH # 201412007), located north-east of downtown Sacramento at the north end of 20th
Street, south of the American River. The Project consists of the installation of a new substation with overhead and underground utility lines, steel structures, and electrical equipment to replace an existing substation. The proposed project areas will occur in a vacant 15.42 acre industrial parcel. The western portion of the site is developed with asphaltic concrete, building pads, and a steel storage shed. The eastern portion contains non-native grassland.

As trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection and management of fish, wildlife, native plants, and habitat. As a responsible agency, the Department administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that conserve the State's fish and wildlife public trust resources. These comments are submitted under the Department's authority as Trustee Agency with regard to the fish and wildlife of the State of California, designated rare or endangered native plants, game refuges, ecological reserves, and other areas administered by the Department (CEQA Guidelines § 15386, subd. (a)). The Department appreciates the opportunity to provide comments.

The Department is concerned with the projects potential to impact State-listed species. The MND states that the non-native grassland onsite provides foraging habitat for hawks and other birds. The California Natural Diversity Database (CNDDB) shows over 10 records of the State listed Swainson’s hawk (Buteo swainsoni) within a 5 mile radius, and one record within 0.5 miles. The Department recommends the replacement of foraging habitat for the non-native grassland portion of the project at a 1:1 ratio replacement in the form of easements on off-site land(s) or compensatory habitat mitigation at a mitigation bank.

The CNDDB shows several records of Western burrowing owl (Athene cunicularia) (BO) within 5 miles of the project site. The Department recommends incorporating mitigation measures into the MND to avoid potential impacts to BOs. A Department Staff Report on Burrowing owls was released in March of 2012. The Staff Report has current avoidance and minimization measures recommended by the Department, as well as the steps necessary if a burrowing owl is found on the project site during proposed construction. The Department recommends incorporating these measures into the MND. The preparer should also include a biological report as an Appendix to the document.

This Project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency. Pursuant to Public Resources Code Sections 21092 and 21092.2, the Department requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

Thank you for the opportunity to review this project. If the Department can be of further assistance, please contact me at (916) 358-2842, or by e-mail at amy.kennedy@wildlife.ca.gov.

Sincerely,

Amy Kennedy
California Dept. of Fish and Wildlife
1701 Nimbus Road
Rancho Cordova, CA 95670
916-358-2842

This e-mail and any attachments contain URS Corporation confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.

2.1.1 Comment 1-1

CDFW state that they have reviewed the CEQA document and clarify their understanding of the Proposed Project.

2.1.2 Response 1-1

SMUD thanks the CDFW for its review of the Proposed Project. It should be noted that the entire project site is zoned industrial and the non-native grassland to the east is of very poor quality. Using the Sacramento County and CDFW Swainson’s Hawk Foraging Habitat Value
Methodology, the portion of the property having non-native grasslands would have a habitat value of 0 percent (County of Sacramento, June 2013). The comment is noted.

2.1.3 Comment 1-2

The CDFW is clarifying its role as a trustee for the State’s fish and wildlife resources, a responsible agency, and enforcer of the California Department of Fish and Game Code.

2.1.4 Response 1-2

SMUD thanks the CDFW for its review of the Proposed Project. The comment is noted.

2.1.5 Comment 1-3

The CDFW recommends mitigation for the loss of Swainson’s hawk foraging habitat.

2.1.6 Response 1-3

SMUD thanks the CDFW for its comment regarding the Proposed Project site’s potential as Swainson’s hawk foraging habitat. The comment warrants providing a more detailed explanation for the conclusion that the Proposed Project will have a less-than-significant impact on Swainson’s hawk foraging habitat. As a result, SMUD has revised the Regulatory Setting in Biological Resources Section 3.4 (pages 3-35 through 3-36) to include a discussion of the California Endangered Species Act and State Fish and Game Code §3511 fully protected species, as follows:

California Endangered Species Act

Under the California’s Endangered Species Act (CESA), §2080 of the State Fish and Game Code prohibits “take” of any species that the State Fish and Game Commission determines to be endangered or threatened. Take is defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” However, state “law does not prohibit indirect harm to a state-listed endangered or threatened species by way of habitat modification.” (78 Op. Atty. Gen. Cal. 137, 139, May 15, 1995). CESA emphasizes early consultation to avoid potential impacts to rare, endangered, and threatened species and to develop appropriate mitigation planning to offset project caused losses of listed species populations and their essential habitats.

California State Fish and Game Code

California State Fish and Game Code §3511 lists the white-tailed kite as a “fully protected” species. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.
SMUD has also revised the impact discussion in Biological Resources, Section 3.4(a) (page 3-36) as follows:

Raptor Foraging Habitat

Swainson’s hawks (listed as threatened under CESA) and other raptors such as white-tailed kite (fully protected under State Fish and Game Code §3511) and red-tailed hawk have been reported nesting within 5 miles of the Proposed Project site. No nest sites have been reported or detected in the Proposed Project area or vicinity that could be affected by project activities. The Proposed Project would result in the permanent loss of approximately 6 acres of ruderal, non-native annual grassland. However, this ruderal grassland habitat provides poor quality foraging habitat for the Swainson’s hawk and other raptors.

In the Sacramento region, Swainson’s hawks forage preferentially in agricultural fields or grassland habitats with low-growing vegetation and higher densities of small mammals (Estep 1989, Woodbridge 1998). The Proposed Project area is characterized as a vacant industrial parcel with approximately 6 acres of ruderal, non-native annual grassland. Dominant vegetation includes non-native weeds such as yellow star thistle, ripgut brome, bull thistle, Italian thistle, and winter vetch (Appendix F). The dense cover and tall stature (averaging 2 feet in height) of this ruderal habitat reduces prey availability for the Swainson’s hawk (Estep 1989, Woodbridge 1998). The site has a history of industrial land uses (Tetra Tech 2009) that would have substantially reduced the potential for an abundant prey base. Moreover, the site is near industrial uses, an active rail line, and adjacent to SMUD’s existing North City Substation, which is routinely accessed by vehicles and crews for operation and maintenance. These factors minimize the site’s potential for prey abundance. Due to the low abundance and low availability of prey in the area of ground disturbance, the Proposed Project would result in a less-than-significant loss in Swainson’s hawk foraging habitat, and no mitigation is required.

As previously mentioned, the IS/MND found that the Proposed Project would result in a less-than-significant loss of annual grassland or foraging habitat for Swainson’s hawk and no mitigation is required due to the poor quality of the approximately 6 acres of ruderal grassland habitat. The methodology for determining foraging habitat impacts developed by CDFW and Sacramento County recognizes that Swainson’s hawk foraging habitat value is greater in large expansive open spaces and agricultural areas than in areas which have been fragmented by residential or urban development (County of Sacramento, 2013). Although prepared for unincorporated portions of Sacramento County, the underlying concepts and methods are applicable to evaluating foraging habitat at the Proposed Project site in the City of Sacramento. In implementing that methodology, the County Planning and Environmental Review Division assumes that parcels zoned industrial have no habitat value, compared with agricultural
parcels, which have a habitat value of 25 to 100 percent. The Proposed Project site is zoned Heavy Industrial (M2), is in an urban setting, and contains very low quality grassland habitat based on multiple site visits by our project biologist. As a result, using the aforementioned CDFW and Sacramento County methodology, the grassland on the Proposed Project site would have a foraging habitat value of 0 percent. Therefore, the methodology supports the determination that the development of the Proposed Project would not result in the loss of significant Swainson’s hawk foraging habitat.

SMUD acknowledges CDFW’s comment that the California Natural Diversity Database (CNDDB) includes multiple reports of Swainson’s hawks occurring within 0.5 to 5 miles from the Proposed Project area. The comment misstates that the IS/MND stated hawks were observed foraging on the site; rather the IS/MND stated that passerine bird species were seen foraging onsite and one hawk species (red-tailed hawk) had been seen flying over the site. SMUD is aware of no documentation that Swainson’s hawks have in fact foraged on the site. CDFW’s comment recommends replacing foraging habitat removed by the Proposed Project. Because removal of this low-quality habitat would not constitute a significant effect on the Swainson’s hawk for the reasons stated above and in the IS/MND, SMUD is not proposing mitigation.

SMUD values its role as an environmental steward and recognizes that impacts to Swainson’s hawk habitat have been a concern in Sacramento County. Accordingly SMUD would implement its policies in environmental stewardship by including, as a condition of project approval, the contribution of $5,000 dollars per year over the next three years to the California Raptor Center at UC Davis. This contribution would fund the recovery and rehabilitation of injured hawks and other raptors in the region.

2.1.7 Comment 1-4

CDFW requests incorporation of avoidance and minimization measures from the CDFW’s 2012 Staff Report on Burrowing Owls into the IS/MND and inclusion of a biological report as an appendix to the IS/MND.

2.1.8 Response 1-4

SMUD appreciates the CDFW’s concern about potential burrowing owl habitat in the Proposed Project area. As described on page 3-33, qualified biologists from URS performed two site visits in 2013 (July 2013 and November 2013) and found no evidence of burrowing owls or suitable burrow habitat for the owls in the Proposed Project area and vicinity. Therefore, the Proposed Project will not affect individuals or populations of burrowing owl. However, should new individuals or a population of burrowing owl occupy the Proposed Project area or its vicinity prior to or during construction, SMUD shall comply with the appropriate standard avoidance and minimization measures prescribed in the CDFW 2012 Department Staff Report on Burrowing Owl Mitigation. Compliance with existing Best Management Practices is standard and consistent with SMUD Policy. Therefore, SMUD is proposing to revise Mitigation Measure BIO-2 to clarify that preconstruction nesting bird surveys would include compliance with Staff Report on Burrowing Owl Mitigation, Appendix D, Breeding and Non-Breeding Season Surveys (CDFG, 2012).
Please refer to Section 3.4 (d), page 3-39 through 3-41 for the revised text of impact discussion 3.4(d) and Mitigation Measure BIO-3.

2.1.9 Comment 1-5

CDFW requests payment of filing fees upon filing of the Proposed Project’s Notice of Determination (NOD).

2.1.10 Response 1-5

SMUD appreciates the CDFW’s review of the Proposed Project. Upon filing the NOD, SMUD will pay the appropriate CDFW filing fee to the Sacramento County Clerk. The current applicable fee as of January 1, 2014 for a Mitigated Negative Declaration is $2,181.25 (Fish and Game Code §711.4, http://www.dfg.ca.gov/habcon/ceqa/ceqa_changes.html).

2.1.11 Comment 1-6

CDFW requests written notification of proposed actions and pending decisions regarding this Proposed Project.

2.1.12 Response 1-6

SMUD appreciates the CDFW’s continued involvement in the Proposed Project. Consistent with Public Resources Code §21092 and §21092.2, SMUD will notify the CDFW about decisions regarding this Proposed Project. The notifications and Final IS/MND and Mitigation Monitoring and Reporting Program (MMRP) will be provided to:

Amy Kennedy
California Department of Fish & Wildlife
1701 Nimbus Road
Rancho Cordova, CA 95670
2.2 Letter 2, Tracey Frost, California Department of Transportation, (Caltrans), February 3, 2014

February 3, 2014

Mr. Jose Bodipo-Menuba
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

Sacramento Municipal Utility District (SMUD) Station E Substation Project—Draft Initial Study (IS)/Mitigated Negative Declaration (MND)

Dear Mr. Bodipo-Menuba,

Thank you for including the California Department of Transportation (Caltrans) in the review and comment process for the SMUD Station E Substation Project Draft IS/MND (Project). The proposed project will install a new substation with overhead and underground utility lines, steel structures, and electrical equipment to replace an existing substation. The proposed project is located northeast of downtown Sacramento at the north end of 20th Street, south of the American River, west of Sutter’s Landing Regional Park and the 28th Street Landfill, and east of the Blue Diamond almond processing facility. The anticipated primary access and exit routes to the Project’s construction site would be 20th Street; C, E, H, J, and L Streets; and State Route (SR) 160. The second phase of construction of this 80-week project (grading, drainage, and access road construction) would involve the most intensive construction traffic generated by worker vehicles and material delivery and hauling. This phase would generate up to a maximum of 264 vehicle trips per day, with up to 27 trips occurring during peak hours. Caltrans’ comments are as follows.

Transportation Management Plan (TMP)

Caltrans concurs that this project will have little to no permanent trip generation upon completion. However, the IS/MND states: “The estimated 72 peak hour construction trips added to the surrounding roadway network would result in a V/C ratio increases of less than 0.02, or less than a 2 percent increase, during the peak hour for roadway segments shown in Table 3-16 and the routes potentially used during construction. Thus, the addition of the Proposed Project’s construction traffic to the existing roadway network would not significantly increase vehicle traffic. The addition of the Proposed Project’s construction traffic would not change the peak-period LOS for any of the studied roadways and the City’s significance thresholds would not be exceeded. Construction traffic would therefore not conflict with applicable plans, ordinances or policies establishing measures of effectiveness for the performance of the...”

*Caltrans improves mobility across California*
Mr. Jose Badiola-Modea/SMUD  
February 3, 2014  
Page 2

circulation system. This impact would be considered less than significant, and no mitigation is required."

This is not consistent with the State Route (SR) 160 Transportation Concept Report (TCR) data and LOS calculations. According to the SR 160 TCR, Segment 4 has a Level of Service of E. Therefore, a TMP for construction may be required. Caltrans would like to discuss the discrepancies between the SR 160 TCR data and SMUD data to determine whether a TMP is required for this project.

TMPs are required when it is determined that traffic restrictions and detours are needed on, or will affect, State highways. Caltrans must approve the TMP prior to construction. A TMP must be prepared in accordance with Caltrans’ Manual on Uniform Traffic Control Devices. Further information is available for download at the following web address:


The SR 160 TCR can be found at the following link:


In addition, we recommend that truck and heavy equipment traffic be avoided on the State Highway System, including SR 160, during commute hours (Monday-Friday 7:00 a.m. to 9:00 a.m., and 4:00 p.m. to 6:00 p.m.).

**Transportation Permit**

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply for a permit, a completed application with the determined specific route(s) for the shipment to follow from origin to destination must be submitted to:

Caltrans Transportation Permits Office  
1823 14th Street  
Sacramento, CA 95811-7119

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.

"Caltrans supports mobility across California"
If you have any questions regarding these comments or require additional information, please contact Melody L. Frilberg, Intergovernmental Review Coordinator, at (916) 263-1625 or by email at: melody.frilberg@dot.ca.gov

Sincerely,

TRACEY FROST, Interim Chief
Office of Transportation Planning – South

c: Scott Morgan, State Clearinghouse
2.2.1 Comment 2-1

The California Department of Transportation (Caltrans) state that they have reviewed the CEQA document and clarify their understanding of the Proposed Project.

2.2.2 Response 2-1

SMUD thanks Caltrans for its review of the CEQA document. The comment is noted.

2.2.3 Comment 2-2

Caltrans states that they concur with SMUD’s CEQA conclusion that the project will have little to no permanent trip generation. The comment also restates the IS/MND’s discussion about the Proposed Project’s construction trips.

2.2.4 Response 2-2

SMUD thanks Caltrans for its review of the CEQA document. The comment is noted.

2.2.5 Comment 2-3

The data and Level of Service (LOS) calculations for State Route (SR) 160 in the IS/MND are not consistent with the Transportation Concept Report (TCR). Caltrans indicates a Transportation Management Plan (TMP) may be required for the Proposed Project due to potential discrepancies between Caltrans traffic data and the project’s data, and the project’s potential to result in traffic restrictions or detours that affect State highways. Caltrans requests a discussion with SMUD staff regarding these topics.

2.2.6 Response 2-3

SMUD appreciates Caltrans concerns about the IS/MND’s evaluation of traffic-related impacts during construction. The Draft IS/MND used the City of Sacramento’s General Plan data for traffic volumes to determine construction related traffic because it provided an overview of traffic information for the City. Given that the City’s General Plan (2009) and the Caltrans data both included traffic data collected in March 2007, we erroneously assumed that the Caltrans data incorporated the General Plan data. In Section 3.16, Transportation and Traffic, Tables 3-15 and 3-16 (pages 3-122 and 3-127, respectively) have been revised to include Caltrans’ SR 160 ADT and peak hour traffic volumes and SR 160’s existing LOS operation levels.

Upon further evaluation, the Caltrans data for SR 160 collected in 2007 and reflects a lower ADT volume (38,160 vehicles per day) on SR 160 than the City’s ADT volume (44,500 vehicles per day). Therefore, any estimated transportation related impacts assumed in the IS/MND would be lessened using the Caltrans ADT data. Using the worst case scenario, the Proposed Project would not contribute significant degradation to daily LOS.

For peak hour traffic volumes, the Caltrans data were greater than the City’s (5,190 compared to 3,300 vehicles per hour). Despite this increase in estimated volumes, the additional construction trips would not result in significant increases of traffic or measurable
impacts on existing peak hour LOS. By using a combination of the Caltrans and City data for daily and peak hour volumes, SMUD captured the worst-case scenario conditions and ensured that the most conservative approach to analyzing impacts to traffic was incorporated in the IS/MND. The Proposed Project will generate less than 1 percent of the new trips on SR 160 during construction and will trigger no significant change in existing or forecasted LOS. As a result, no lane closures, road detours, and/or flagging crews would be required and ultimately no TMP would be necessary for the Proposed Project. SMUD staff will continue to coordinate with the City and Caltrans to ensure that road operations remain effective during construction and operation. The anticipated level of impact will remain less than significant and no TMP would be required.

2.2.7 Comment 2-4

Caltrans recommends that project-related traffic be avoided on State highways, including SR 160, during peak morning or afternoon hours.

2.2.8 Response 2-4

As described in Response 2-3, the Proposed Project will have minimal effects on traffic on State highways. To the degree feasible, the Proposed Project will try to limit or avoid truck trips on State highways during peak hours. SMUD’s staff will continue to discuss the Project’s circulation approach with Caltrans throughout construction and operation.

2.2.9 Comment 2-5

Caltrans requires and issues transportation permits for oversized or excessive load vehicles on State roadways.

2.2.10 Response 2-5

SMUD appreciates Caltrans concerns about the effects of oversized or excessive load vehicles on State roadways. SMUD and its contractor will identify the Proposed Project’s need for any oversized or excessive load vehicles. If these vehicle types would be required for construction of the Proposed Project on State highways, SMUD will ensure a transportation permit from Caltrans is obtained prior to Proposed Project implementation, and that all contractors comply with any provisions in the permit.
2.3 Letter 3, Scott Morgan, Governor’s Office of Planning and Research, State Clearinghouse February 4, 2014

February 4, 2014

Jose Bodipo-Membra
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

Subject: Station E Substation Project Draft IS/MND
SCH#: 2014012007

Dear Jose Bodipo-Membra:

The State Clearinghouse submitted the above named Mitigated 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 February 3, 2014, 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.”

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 TENTH STREET  P.O. BOX 3044  SACRAMENTO, CALIFORNIA  95812-3044
TEL (916) 445-0613  FAX (916) 323-3018  www.opcr.ca.gov
2.3.1 Comment 3-1

The Governor’s Office of Planning and Research State Clearinghouse and Planning Unit’s letter states that they have reviewed the CEQA document and clarifies their role in the review.

2.3.2 Response 3-1

SMUD thanks Governor’s Office of Planning and Research State Clearinghouse and Planning Unit’s for its review and distribution of the CEQA document. The comment is noted.
2.4 Letter 4, Trevor Cleak, Central Valley Regional Water Quality Control Board (CVRWQCB), January 31, 2014

Central Valley Regional Water Quality Control Board

31 January 2014

Jose Bocippo-Memba
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

CERTIFIED MAIL
7013 1710 0002 3644 0588

Pursuant to the State Clearinghouse's 3 January 2014 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 Station E Substation 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.

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 (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
Phase I and II Municipal Separate Storm Sewer System (MS4) Permits

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:

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

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. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

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 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.

---

1 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.
SECTION 2.0
COMMENTS AND RESPONSES

Station E Substation Project
Sacramento County

31 January 2014

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit, or any other federal permit, 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
If USACE 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 will 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:

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.

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

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
2.4.1 Comment 4-1

A Construction Storm Water General Permit is required for projects that disturb one or more acres of soil.

2.4.2 Response 4-1

SMUD thanks the CVRWQCB for its comments. The Proposed Project will disturb greater than 1 acre of soil. As indicated in Section 2.6, Permits and Approvals (page 2-19) and Mitigation Measure GEO-2 (in Section 3.6, Geology and Soils, page 3-61) of the IS/MND, SMUD will obtain and comply with a Construction Storm Water General Permit, and prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). SMUD will ensure its staff and contractors comply with the requirements in the Construction Storm Water General Permit obtained for the Proposed Project.

2.4.3 Comment 4-2

Phase I and II Municipal Separate Storm Sewer System (MS4) permits have specific design concepts and development standards for permittees.

2.4.4 Response 4-2

SMUD appreciates the CVRWQCB’s concern about MS4 permit standards. As indicated in the Proposed Project’s IS/MND in Section 2.6, Permits and Approvals (page 2-19), in Mitigation Measure GEO-2 found in Section 3.6, Geology and Soils (page 3-61), and in Section 3.9, Hydrology and Water Quality (page 3-89), the Proposed Project will comply with the City of Sacramento’s storm water ordinances and the City’s MS4 National Pollutant Discharge Elimination System (NPDES) permit. Specifically, Mitigation Measure GEO-2, in the IS/MND’s Section 3.6, Geology and Soils (page 3-6), requires compliance with the City’s MS4 Permit, which would include complying with the MS4 permit’s specific design concepts.
and development standards. SMUD will ensure its staff and contractors comply with the requirements in the Phase I and II MS4 permits obtained for the Proposed Project.

2.4.5 Comment 4-3

Storm water discharges associated with industrial sites must comply with the Industrial Storm Water General Permit.

2.4.6 Response 4-3

SMUD appreciates the CVRWQCB’s concern about Industrial Storm Water General Permit compliance. The Industrial Storm Water General Permit requires that manufacturing facilities obtain coverage under this permit where industrial materials, equipment, or activities are exposed to storm water. The Station E Substation’s would not discharge stormwater from the project site. Stormwater runoff from the site will be collected onsite in a graded retention basin as shown on Figure 2-3 (page 2-11). Therefore the Industrial Storm Water General Permit would not apply to the Proposed Project.

2.4.7 Comment 4-4

Projects that involve the discharge of dredged or fill material in navigable waters or wetlands require a permit pursuant to Section 404 of the Clean Water Act.

2.4.8 Response 4-4

SMUD appreciates the CVRWQCB’s concern about Section 404 permit compliance. As discussed in Section 3.4(c), Biological Resources (page 3-39), there are no potentially jurisdictional streams, wetlands or other waters of the U.S. or waters of the State that occur in the Proposed Project area of that may be affected. Stormwater runoff from the site will be collected onsite in a graded retention basin, and no runoff is expected to streams or wetlands. Therefore, the Proposed Project would not be required to obtain coverage under a Section 404 permit.

2.4.9 Comment 4-5

Projects that disturb waters of the U.S., including streams or wetlands, would be required to obtain a Section 401 Water Quality Certification from the Central Valley Regional Water Quality Control Board.

2.4.10 Response 4-5

SMUD appreciates the CVRWQCB’s concern about Clean Water Act Section 401 compliance. As discussed in Section 3.4(c), Biological Resources (page 3-39), the Proposed Project would not disturb any wetlands or other waters of the U.S. Therefore, a Section 401 Water Quality Certification would not be required for the Proposed Project.
2.4.11 Comment 4-6

Projects that affect waters of the State ("non-federal" waters of the State) would require a Waste Discharge Requirement permit from the Central Valley Regional Water Quality Control Board.

2.4.12 Response 4-6

SMUD appreciates the CVRWQCB’s concern about impacts to waters of the State. As discussed in Section 3.4(c), Biological Resources (page 3-39), the Proposed Project would not require a Waste Discharge Requirement permit because it would not affect any wetlands or waters of the State.

2.4.13 Comment 4-7

Projects that include construction dewatering and the subsequent discharge of groundwater to waters of the United States require coverage under the Low or Limited Threat General NPDES Permit.

2.4.14 Response 4-7

SMUD appreciates the CVRWQCB’s concern about NPDES permit compliance. As discussed Section 3.9, Hydrology and Water Quality, in the Environmental Setting section (page 3-87), the depth to groundwater ranges between 21.5 feet below the ground surface in the center of the site to 32.1 feet below the ground surface directly west of the site entrance. It is not anticipated that construction-related groundwater dewatering will be required. Therefore, a Low or Limited Threat General NPDES Permit would not be required for the Proposed Project.

2.5 Letter 5, King Tunson, Sacramento Fire Department (CVRWQCB), February 2, 2014

From: Tunson, King <ktunson@sfd.cityofsacramento.org>
Sent: Sunday, February 02, 2014 9:10 PM
To: Jose Bodipo-Memba
Subject: Station E Substation Mitigated negative Declaration

Jose,

I’ve reviewed the above-reference document and have no comment.

King Tunson
Plan Review- Fire Prevention
Supervisor, Fire Prevention Administration Sacramento Fire Department
300 Richards Blvd, 2nd Floor
Sacramento, CA 95811
Office (916) 808-1358
Fax (916) 808-4776
2.5.1 Comment 5-1

The City of Sacramento Fire Department has reviewed the CEQA document and has no comments.

2.5.2 Response 5-1

SMUD thanks the City of Sacramento Fire Department for its review of the CEQA document. The comment is noted.

2.6 Letter 6, Mr. and Mrs. Robert Sewell, Residents, January 7, 2014

From: Robert Sewell <rsewell222@gmail.com>
Sent: Tuesday, January 07, 2014 7:13 PM
To: Jose Bodipo-Memba
Subject: Q. on the proposed new substation in Midtown Ca.

Hi Jose,

We live on C. St between 22 & 23rd St. We'd like to know what the proposed new substations physical layout is, it's height and width. Will there be power lines with towers in the new station as they are in the old station? Most importantly, what effects will it have on people who live in the community of Midtown, especially families who live adjacent to the station?

Mr. & Mrs Robert Sewell

2.6.1 Comment 6-1

Mr. and Mrs. Sewell wanted to clarify the layout of the proposed substation and clarify the anticipated effects of the station on nearby residents.

2.6.2 Response 6-1

SMUD thanks Mr. and Mrs. Sewell for their comments and their concern for their community. It is our hope that our email to you on January 8, 2014 addressed your questions. However, if it did not, we have included specific information below.

This Station E IS/MND document contained both verbal and visual descriptions of the Proposed Project layout in Chapter 2, Project Description. Figures 2-2 and 2-3 (pages 2-10 and 2-11, respectively) provide a visual layout of the Proposed Project site under existing and proposed conditions. Specific information about the height and dimensions of the structures can be found on page 2-13. Specifically, the Proposed Project would contain the following:

The Proposed Project would consist of: electrical equipment including power transformers; circuit breakers; capacitors; instrument transformers; control and relay equipment; remote monitoring equipment; telecommunications equipment; batteries; steel structures;
transmission towers, switches; overhead and underground conductor and cable; electrical bus; and, a control building (approximately 24 by 90 feet).

Steel structures that would support equipment, electrical buses, and conductors would vary in height from 15 feet to 40 feet. Steel structures that support overhead conductors entering the substation from the transmission and distribution lines would be up to 70 feet tall. Incoming transmission line conductors would be supported by steel poles up to 170 feet tall. Power transformers and circuit breakers inside the substation would be approximately 40 feet tall. To maintain site security and public safety, the Proposed Project’s substation would have a 9-foot fence around the perimeter of the substation. The fence would be chain link with barbed wire and razor ribbon at the top.

The Station E IS/MND contains visual simulations of what the Proposed Project will most likely look like upon completion (Figures 3-9 through 3-11) (pages 3-11 and 3-12, respectively), which is generally consistent with the existing North City Substation. Regarding the Proposed Project’s impact on nearby residents, Chapter 3 of the IS/MND provides detailed analysis of the potential environmental impacts on nearby residents and the community at large. The IS/MND determined that no significant environmental impacts, with incorporation of identified mitigation measures, would be generated during the Proposed Project’s construction and operation. SMUD staff will make itself available should you have additional questions or concerns. Thanks again for taking the time to record your comment.

2.7 References

The following new references have been added to Section 5.0 References, page 5-1:


APPENDIX A
MITIGATION MONITORING
AND REPORTING PROGRAM (MMRP)
INTRODUCTION

This mitigation monitoring and reporting plan summarizes identified mitigation measures, implementation schedule, and responsible parties for the Proposed Project. SMUD will use this mitigation monitoring and reporting plan to ensure that identified mitigation measures, adopted as a condition of project approval, are implemented appropriately. This monitoring plan meets the requirements of CEQA Guidelines Section 14074(d), which mandates preparation of monitoring provisions for the implementation of mitigation assigned as part of project approval or adoption.

Mitigation Implementation and Monitoring

SMUD will be responsible for monitoring the implementation of mitigation measures designed to minimize impacts associated with the Proposed Project. While SMUD has ultimate responsibility for ensuring implementation, others may be assigned the responsibility of actually implementing the mitigation. SMUD will retain the primary responsibility for ensuring that the Proposed Project meets the requirements of this mitigation plan and other permit conditions imposed by participating regulatory agencies.

SMUD will designate specific personnel who will be responsible for monitoring implementation of the mitigation that will occur during project construction. The designated personnel will be responsible for submitting documentation and reports to SMUD on a schedule consistent with the mitigation measure and in a manner necessary for demonstrating compliance with mitigation requirements. SMUD will ensure that the designated personnel have authority to require implementation of mitigation requirements and will be capable of terminating project construction activities found to be inconsistent with mitigation objectives or project approval conditions.

SMUD will be responsible for demonstrating compliance with any agency permit conditions to the appropriate regulatory agency. SMUD will also be responsible for ensuring that its construction personnel understand their responsibilities for adhering to the performance requirements of the mitigation plan and other contractual requirements related to the implementation of mitigation as part of project construction.

In addition to the prescribed mitigation measures, Table A-1 lists each identified environmental resource being affected, the corresponding monitoring and reporting requirement, and the party responsible for ensuring implementation of the mitigation measure and monitoring effort.

Mitigation Enforcement

SMUD will be responsible for enforcing mitigation measures. If alternative measures are identified that would be equally effective in mitigating the identified impacts, implementation of these alternative measures will not occur until agreed upon by SMUD.
<table>
<thead>
<tr>
<th>Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>a.) Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation? — Less than Significant with Mitigation</td>
<td><strong>Mitigation Measure AIR-1</strong>&lt;br&gt;SMUD shall use SMAQMD’s Construction Mitigation Calculator to implement a combination of the following measures to reduce construction NOx emissions to below 85 pounds per day. Mitigation would include one or more of the following:&lt;br&gt;SUMID shall provide a plan for approval by the SMAQMD demonstrating that onsite heavy-duty (50 hp or more) off-road vehicles will achieve a project wide fleet-average of 20 percent NOx reduction or greater compared to the most recent CARB fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The SMAQMD’s Construction Mitigation Calculator would be used to identify an equipment fleet that achieves this reduction.&lt;br&gt;Contractor shall be required, through contracting language, to ensure that heavy-duty trucks accessing the site shall be equipped with model year 2010 or newer engines, or have equivalent emission reductions using after-market control devices.&lt;br&gt;SMUD shall pay a fee into the SMAQMD’s Off-Site Mitigation Fee Program to offset Proposed Project NOx emissions prior to obtaining a grading permit. The SMAQMD uses these fees to purchase emission reductions in the Sacramento region. The SMAQMD’s mitigation fee calculator would be used to determine the total amount of the mitigation fee.&lt;br&gt;If, at the time of construction, the SMAQMD has adopted a regulation applicable to construction emissions, compliance with the regulation may completely or partially replace this mitigation. Consultation with the SMAQMD prior to construction will be necessary to make this determination.&lt;br&gt;<strong>Implementation of Mitigation Measure Air-1</strong> will be verified as follows:&lt;br&gt;1. SMUD shall submit to the SMAQMD an inventory of off-road construction equipment, equal to or greater than 50 hp, that will</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
</tr>
</tbody>
</table>
Table A-1: Mitigation Measures

<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility Implementation</th>
<th>Responsibility Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>be used an aggregate of 40 or more hours during construction. The inventory shall include the horsepower rating, engine model year, and projected hours of use. The inventory shall be updated and submitted monthly during construction. No inventory shall be required for any 30-day period in which no construction activity occurs.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>At least 48 hours prior to the use of heavy-duty off-road equipment, SMUD shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman. The SMAQMD’s Model Equipment List can be used to submit this information.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>SMUD shall ensure that emissions from off-road diesel powered equipment used on the Proposed Project site do not exceed 40 percent opacity for more than 3 minutes in any 1 hour based on a visual survey conducted at least weekly. The inspections shall occur 1 hour per week by a CARB certified inspector. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately. Non-compliant equipment will be documented and a summary provided to the SMAQMD monthly. A monthly summary of the visual survey results shall be submitted during construction. No monthly summary shall be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles and the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this verification section shall supersede other SMAQMD, state, or federal rules or regulations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>With implementation of Mitigation Measure AIR-1, NOx emissions from construction vehicle operations would be reduced through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. If NOx emissions still exceed the 85 pounds per day threshold, the fee under SMAQMD’s Off-Site Mitigation Fee Program would be used by SMAQMD to purchase emission reductions in the Sacramento region sufficient to achieve the</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table A-1: Mitigation Measures

<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility Implementation</th>
<th>Responsibility Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biological Resources a)</td>
<td>Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS? — Less Than Significant with Mitigation</td>
<td><strong>Mitigation Measure BIO-1</strong></td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
<td>SMUD</td>
</tr>
</tbody>
</table>

identified threshold. Therefore, with implementation of these measures, the Proposed Project’s NOx emissions would be reduced to below SMAQMD’s significance threshold and would be considered a **less than significant** impact. No additional mitigation measures are required.

SMUD shall implement the following measures to avoid incidental take of VELB habitat during construction.

1. No grading would occur within 20 feet of the dripline of the remaining shrubs.

SMUD shall implement the following impact avoidance measures for activities conducted between 20 and 100 feet of elderberry shrubs to avoid incidental take during construction:

1. The presence of elderberry shrubs in the construction area and vicinity will be documented on work orders and the SMUD Project Manager will be informed.

2. Construction personnel will receive instruction regarding the presence of elderberry shrubs, VELB, the importance of avoiding impacts to VELB and its habitat, and the possible penalties for not complying with these requirements.

3. A 20-foot exclusion boundary around elderberry shrubs will be clearly flagged or fenced in the field and marked on construction plans, and signs will be posted with the following information: "This area is habitat of the valley elderberry longhorn beetle, a threatened species, and must not be disturbed. This species is protected by the Endangered Species Act of 1973, as amended. Violators are subject to prosecution, fines, and imprisonment." The signs shall be clearly readable and must be maintained for the duration of construction.

4. A biological monitor will be required to supervise construction activities falling between 20 and 100-feet of elderberry shrubs and stop work should personnel be out of compliance with the VELB avoidance measures, or if there is a risk that incidental
### Table A-1: Mitigation Measures

<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility Implementation</th>
<th>Responsibility Monitoring</th>
</tr>
</thead>
</table>
| Biological Resources | d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? — Less Than Significant with Mitigation | **Mitigation Measure BIO-2**  
*Burrowing owls.* SMUD would conduct pre-construction nesting bird surveys consistent with the Staff Report on Burrowing Owl Mitigation, Appendix D. Breeding and Non-breeding Season Surveys (CDFG 2012). These surveys would consist of two qualified biologists surveying up to four times prior to construction the Proposed Project area and a buffer area of up to 150 meters from areas of ground disturbance such that the entire ground surface is visually inspected. If occupied burrowing owl burrows are identified, SMUD would consult with the CDFW to develop project specific impact avoidance measures. Specific measures would be based on the context and setting of the burrow in relation to construction activities. Typical measures include:  
  - Avoid disturbing occupied burrows during the nesting period, from 1 February through 31 August  
  - Establishing non-disturbance buffers around occupied burrows  
  - Providing an onsite biological monitor with stop work authority  
  - Passively re-locating owls to approved sites a safe distance from construction  
  - Develop and implement a worker awareness program to increase the on-site worker’s recognition of and commitment to burrowing owl protection.  
*Other nesting birds.* SMUD would avoid project construction in areas where actively nesting birds are present. If ground disturbance is initiated during the nesting season, a qualified biologist will conduct a focused survey of the Proposed Project area and out 250 feet from the Proposed Project site to determine if | Construction | Construction | SMUD | SMUD |
<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>active nests occur within 14 days prior to ground disturbance. If no active nests are identified, no further mitigation is required. If active nests are identified, work within 250 feet of the active nest will be postponed until a qualified biologist determines that nesting is complete, such as if the young have fledged from the nest or the nest is abandoned. If it is not feasible to delay construction, then SMUD will consult with the CDFW and/or USFWS as appropriate to identify additional impact avoidance measures. Typical measures may include establishing visual screening between the construction area and the nest, modifying work activities adjacent to the nest, and/or providing an onsite biological monitor to observe bird behavior with authority to stop work if it is determined that construction is adversely affecting nest behavior. Implementation of Mitigation Measure BIO-2 is expected to avoid impacts to actively nesting birds, including burrowing owls, and would therefore reduce this impact to less than significant.</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? — Less Than Significant with Mitigation</td>
<td>Mitigation Measure BIO-3 Prior to tree removal, SMUD will obtain a permit from the City of Sacramento to remove a heritage-sized tree. Payment of the appropriate permit application fee would go to the City's urban forestry programs to plant and maintain other trees within the City of Sacramento. Obtaining the tree removal permit and payment of the appropriate impact fee, with the funds supporting the City's tree program, would mitigate the impact of tree removal to a less-than-significant level, and no other mitigation is required.</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? — Less Than Significant with Mitigation</td>
<td>Mitigation Measure CUL-1 If cultural resources are discovered during the Proposed Project's construction activities, they shall be evaluated for eligibility for inclusion in the CRHR. Resource evaluations shall be conducted by individuals who meet the United States Secretary of Interior's professional standards in archaeology and architectural history. If any of the resources meet the eligibility criteria identified in Public Resources Code Section 5024.1, or CEQA Section 21083.2(g), SMUD will develop and implement mitigation measures according to CEQA Guidelines Section 15126.4(b) before construction begins</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
</tr>
</tbody>
</table>
For resources eligible for listing in the CRHR that would be rendered ineligible by the effects of project construction, mitigation measures will be implemented. Mitigation measures for archaeological resources shall be selected from the following: avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties such as Native American tribes. Mitigation measures for historic architectural resources shall consist of treating these resources according to the U.S. Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Implementation of the approved mitigation would be required before beginning/resuming any construction activities with potential to affect identified eligible resources at the site.

Implementation of the Mitigation Measure CUL-1 would ensure impacts on historical resources discovered during the Proposed Project’s construction are reduced to a less-than-significant level by avoiding, protecting, or appropriately excavating the resources.

<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility Implementation</th>
<th>Responsibility Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural Resources</td>
<td>c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? — Less Than Significant with Mitigation</td>
<td>Mitigation Measure CUL-2</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
<td>SMUD</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>d) Disturb any human remains, including those interred outside of formal cemeteries? — Less than Significant with Mitigation</td>
<td>Mitigation Measure CUL-3</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
<td>SMUD</td>
</tr>
</tbody>
</table>
Table A-1: Mitigation Measures

<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility Implementation</th>
<th>Responsibility Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geology and Soils</td>
<td>a)</td>
<td>Minimum radius of 50 feet, and the local County Coroner shall be notified. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the Coroner determines that the remains are those of a Native American, he or she must contact NAHC by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). Pursuant to the provisions of California Public Resources Code Section 5097.98, the NAHC shall identify a Most Likely Descendant (MLD). The MLD designated by the NAHC shall have at least 48 hours to inspect the site and propose treatment and disposition of the remains and any associated grave goods.</td>
<td>Mitigation Measure GEO-1</td>
<td>Prior to and During Construction</td>
<td>Prior to and During Construction</td>
<td>SMUD</td>
</tr>
<tr>
<td></td>
<td>ii)</td>
<td>Seismic-related ground failure, including liquefaction? — Less Than Significant with Mitigation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Mitigation Measure GEO-1

To mitigate potential liquefaction hazards, the Proposed Project shall implement one or more of the geotechnical recommendations, as applicable, in the Geotechnical Engineering Study (Youngdahl, 2011) or as further recommended by Youngdahl. Applicable recommendations are summarized below.

1. **Surficial Improvements such as pavement and drive areas:**

   Surficial improvements such as pavement and drive areas shall be supported by native soils, and/or engineered fills, when composed of like materials and processed and compacted.

2. **Shallow Foundations:**

   To provide a uniform support condition for shallow foundations for the west, middle, and east one-thirds of the site, the Proposed Project shall overexcavate and recompact undocumented fills.

3. **Structural Improvements:**

   Structural improvements shall be supported by cast-in drilled holes (CIDH) piles, as an alternative to soil over-excavation and shallow foundation construction.

4. **Site Design:**

   The site design shall be performed by a structural engineer and shall be reviewed by a geotechnical consultant to ensure consistency with the design recommendations included in the Geotechnical Engineering Study for North City Substation Relocation, Sacramento, California (Youngdahl, 2011).

Implementation of Mitigation Measure GEO-1 would reduce...
<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geology and Soils</td>
<td>b) Result in substantial soil erosion or the loss of topsoil? — Less Than Significant with Mitigation</td>
<td><strong>Mitigation Measure GEO-2</strong>&lt;br&gt;The Proposed Project shall comply with the City of Sacramento’s stormwater ordinances (13.16 and 15.88), and the City’s NPDES Permit (i.e., SQIP). In addition, the project shall comply with the NPDES General Construction Permit because the Proposed Project’s construction activities would disturb more than 1 acre. Compliance with these regulations and permits would require preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP), including spill prevention and control measures, an erosion control plan, a grading plan, and a storm water management plan for the Proposed Project. These plans would collectively require the project to implement best management practices (BMPs) during the construction period to prevent and control the transport of pollutants, including sediments, trash, pathogens, and hazardous materials.&lt;br&gt;&lt;br&gt;Typical SWPPP BMPs include:&lt;br&gt;• Implementing practices to minimize the contact of construction materials, equipment, and maintenance supplies with storm water.&lt;br&gt;• Limiting fueling and other activities using hazardous materials to designated areas, providing drip pans under equipment, and daily checks for vehicle condition.&lt;br&gt;• Implementing practices to reduce erosion of exposed soil, including stabilization for soil stockpiles, watering for dust control, installing perimeter silt fences, and/or placement of fiber rolls.&lt;br&gt;• Implementing practices to maintain water quality including silt fences, stabilized construction entrances, and storm drain inlet protection.&lt;br&gt;• Developing spill prevention and emergency response plans to handle potential fuel or other spills.</td>
<td>During Project Construction and Operations</td>
<td>During Project Construction and Operations</td>
<td>SMUD</td>
</tr>
</tbody>
</table>

 liquefaction potential on the Proposed Project site to a **less-than-significant** level by reducing the exposure of site structures to liquefiable soils and ensuring the facility’s foundations are suitable for the site conditions.
<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greenhouse Gas Emissions</td>
<td>a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? — Less than Significant with Mitigation</td>
<td><strong>Mitigation Measure GHG-1</strong>&lt;br&gt;SMUD shall implement applicable and feasible BPSs to reduce greenhouse gas emissions from construction activities to meet SMAQMD practices as described below.&lt;br&gt;• Improve fuel efficiency from construction equipment by implementing the following:&lt;br&gt;  — Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 3 minutes (5 minute limit is required by the state airborne toxics control measure [Title13, sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site.&lt;br&gt;  — Train equipment operators in proper use of equipment.&lt;br&gt;  — Maintain construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.&lt;br&gt;  — Use the proper size of equipment for the job.&lt;br&gt;  — Use equipment with new technologies (repowered engines, electric drive trains) to the extent feasible.&lt;br&gt;  — Perform on-site material hauling with trucks equipped with on-road engines (if determined to be less emissive than the off-road engines).</td>
<td>Construction</td>
<td>Construction</td>
<td>SMUD</td>
</tr>
<tr>
<td>Checklist Section</td>
<td>Environmental Criteria</td>
<td>Mitigation Measure</td>
<td>Implementation Duration</td>
<td>Monitoring Duration</td>
<td>Responsibility Implementation</td>
</tr>
<tr>
<td>-------------------</td>
<td>------------------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
<td>-------------------------</td>
<td>---------------------</td>
<td>-----------------------------</td>
</tr>
</tbody>
</table>
| Hazards and Hazardous Materials | a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? — Less than Significant with Mitigation. | **Mitigation Measure HAZ-1**  
A hazardous materials transportation and handling safety plan shall be developed that identifies specific protocols for the transport of hazardous materials to and from the project site, and the handling of these materials once they arrive on the project site. These protocols shall include the identification of appropriate transportation routes that avoid sensitive land uses such as the Courtyard Elementary School. These protocols shall also identify how materials will be used and stored on the project site during both construction and operations. The transport and handling of hazardous materials shall be consistent with the requirements of State law. The identified protocols shall be implemented by SMUD and its contractors during project construction and operations. | Prior to and During Construction | Prior to and During Construction | SMUD | SMUD |
| Hydrology and Water Quality | a) Violate any water quality standards or waste discharge requirements? — Less Than Significant with Mitigation | **Mitigation Measure HYD-1**  
Implement Mitigation Measure GEO-2. | Operation | Operation | SMUD | SMUD |