Sacramento Municipal Utility District

Headquarters Campus Master Plan

Final Environmental Impact Report

State Clearinghouse #2017092050

July 2018

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: Rob Ferrera
(916) 732-6676 or rob.ferrera@smud.org

Prepared by:
Ascent Environmental
455 Capitol Mall, Suite 300
Sacramento, CA 95814
Contact: Chris Mundhenk
Chris.Mundhenk@ascentenvironmental.com
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<td>6-1</td>
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<th>Description</th>
<th>Page</th>
</tr>
</thead>
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<td>List of Commenters</td>
<td>2-1</td>
</tr>
<tr>
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<td>4-5</td>
</tr>
</tbody>
</table>

Attachments

Attachment A  Headquarters Campus Master Plan Draft EIR (as amended through Final EIR) – provided on CD and at https://www.smud.org/en/Corporate/About-us/Company-Information/Reports-and-Statements/CEQA-Reports
Acronyms and Abbreviations

Draft EIR  Draft Environmental Impact Report
EIR       Environmental Impact Report
Final EIR Final Environmental Impact Report
GHG       greenhouse gas
HQCMP or project Headquarters Campus Master Plan
LIR       Landscape Inventory Report
MMRP      mitigation monitoring and reporting program
mph       miles per hour
PG&E      Pacific Gas & Electric
RWQCB     Regional Water Quality Control Board
SacRT     Sacramento Regional Transit
SMAQMD    Sacramento Metropolitan Air Quality Management District
SMUD      Sacramento Municipal Utility District
Board     SMUD’s Board of Directors
1 Introduction

On April 25, 2018, the Sacramento Municipal Utility District (SMUD) released for public review the draft environmental impact report (Draft EIR) for the proposed Headquarters Campus Master Plan (HQCMP or project). The EIR describes the existing conditions of the SMUD Headquarters Campus, analyzes the potential environmental impacts of the development that may occur under the proposed campus master plan, and identifies mitigation measures where necessary and available to avoid or reduce the magnitude of potentially significant impacts of the proposed plan. This EIR is characterized as a Program EIR prepared pursuant to Section 15168 of the State CEQA Guidelines. It is intended to be an analytical superstructure for subsequent analyses associated with individual project proposals that implement the HQCMP. The EIR also considers implementation of Phase 1 of the HQCMP at a more detailed level (i.e., project level).

1.1 Public Review and Response to Comments

In accordance with Sections 15087 and 15105 of the State CEQA Guidelines, the Draft EIR was circulated for public review and comment to lead and responsible agencies, as well as members of the public, for 45 days (April 25, 2018 through June 11, 2018). SMUD also held a public meeting on May 9, 2018 to receive comments on the Draft EIR. One individual attended the meeting, but no public comments were submitted at the meeting. Written comment letters received on the Draft EIR are provided in their entirety in Chapter 2, “Comments and Responses to Comments.”

Responses to each of the comments received are provided in this document as part of the final environmental impact report (Final EIR). Although some of the comments have resulted in changes to the text of the Draft EIR (see Chapter 3, “Corrections and Revisions to the Draft EIR”), none of the changes constitute “significant new information,” which would require recirculation of the Draft EIR. Significant new information is defined in Section 15088.5(a) of the State CEQA Guidelines as follows:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
None of these circumstances has arisen from comments on the Draft EIR; therefore, recirculation is not required.

The Draft EIR, Final EIR, and associated appendices are available for review online at: https://www.smud.org/en/Corporate/About-us/Company-Information/Reports-and-Statements/CEQA-Reports and at the following locations:

Sacramento Municipal Utility District
Customer Service Center
6301 S Street
Sacramento, CA 95817

Sacramento Municipal Utility District
East Campus Operations Center
4401 Bradshaw Road
Sacramento, CA 95827

As required by State CEQA Guidelines Section 15088(b), SMUD has provided a hard or electronic copy (through the SMUD’s website; see prior discussion) to each public agency that submitted written comments on the Draft EIR with written responses to that public agency’s comments at least 10 days before certifying the Final EIR.

1.2 Organization of the Responses to Comments

Chapter 2 of the Final EIR consists of the written comments received on the Draft EIR and presents responses to environmental issues raised in the comments (as required by State CEQA Guidelines Section 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as required by Section 15088(c) of the State CEQA Guidelines.

Each comment letter has been reproduced with individual comments bracketed and numbered. Responses to the comments follow each letter. For example, the response to the second comment of the first letter would be indicated as Response to Comment 1-2. In some instances, clarifications of the text of the Draft EIR may be required. In those cases, the text of the Draft EIR is revised and the changes compiled in Chapter 3, “Corrections and Revisions to the Draft EIR.” The text deletions are shown in strikeout and additions are shown in double underline.

1.3 Comments that Require Responses

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required on comments regarding the merits of the project or on issues not related to the project’s environmental impacts. Comments on the merits of the proposed project or other comments that do not raise environmental issues will be reviewed by SMUD’s Board of Directors (the Board) before an action is taken on the project. The responses in this Final EIR address environmental issues and indicate where issues raised are not environmental or address the merits of the projects. In the latter instance, no further response is provided.
1.4 Project Decision Process

This document and the Draft EIR together constitute the Final EIR, which will be considered by the Board. If the Board decides to approve any specific phase of the HQCMP (e.g., Phase 1), it must first certify that the Final EIR evaluates the potential impacts that may occur in compliance with CEQA’s requirements, was reviewed and considered by the Board, and reflects the Board’s independent judgment and analysis, as required by State CEQA Guidelines Section 15090. The Board would then be required to adopt findings of fact on the disposition of each significant environmental impact, as required by State CEQA Guidelines Section 15091. If significant and unavoidable impacts (those that cannot be mitigated to a less-than-significant level) would result from a specific phase of the HQCMP and the Board chooses to approve its implementation, the Board would need to adopt a statement of overriding considerations, pursuant to State CEQA Guidelines Section 15093, explaining the overriding factors that the Board deems allow the project to move forward. No significant and unavoidable impacts would occur as a result of the proposed project. A mitigation monitoring and reporting program, which is required by CEQA Guidelines Section 15091(d), has been included as part of Chapter 4 of this Final EIR.
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2 Comments and Responses to Comments

This chapter of the Final Environmental Impact Report (Final EIR) contains the comment letters received during the public review period for the Draft Environmental Impact Report (Draft EIR), which concluded on June 11, 2018. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

2.1 Commenters on the Draft EIR

Table 2-1 below indicates the alpha-numerical designation for the comment letters received, the author of the comment letter, and the date of the comment letter. Comment letters have been numbered in the order they were received by SMUD.

<table>
<thead>
<tr>
<th>Letter Number</th>
<th>Commenter</th>
<th>Date</th>
<th>Agency/Organization</th>
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<td>State</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>S1</td>
<td>Morneau, Jefferey</td>
<td>June 15, 2018</td>
<td>California Department of Transportation</td>
</tr>
<tr>
<td>Local</td>
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<td>L1</td>
<td>Tunson, King</td>
<td>May 22, 2018</td>
<td>City of Sacramento Fire Department</td>
</tr>
<tr>
<td>L2</td>
<td>Hurley, J.J.</td>
<td>June 11, 2018</td>
<td>Sacramento Metropolitan Air Quality Management District</td>
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<td>Interested Parties</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I1</td>
<td>Spigott, John</td>
<td>June 11, 2018</td>
<td>Pacific Gas &amp; Electric</td>
</tr>
</tbody>
</table>

2.2 Comments and Responses on the Draft EIR

The written comments received on the Draft EIR and the responses to those comments are provided in this section of the Final EIR. The comment letters received are reproduced in their entirety and followed by the response(s) to the letter. Each comment within the letter is indicated by a line bracket and an identifying number in the margin of the comment letter. The responses that follow the letter are numbered, corresponding to the comment number in the bracketed letter.

All comments and provided herein are included within the record for consideration by the SMUD Board of Directors (Board) as part of the HQCMP EIR.
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State
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June 15, 2018

03-SAC-2017-00077
SCH 2017092050

Mr. Rob Ferrera
Environmental Management
Sacramento Municipal Utility District
6201 S Street, MS H201
Sacramento, CA 95817

Headquarters Campus Master Plan – Draft Environmental Impact Report (DEIR)

Dear Mr. Ferrera:

Thank you for including the California Department of Transportation (Caltrans) in the DEIR review process for the project referenced above. Caltrans’ new mission, vision, and goals signal a modernization of our approach to California’s transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/ viability/economy, and safety/health. We provide these comments consistent with the State’s smart mobility goals that support a vibrant economy, and build communities, not sprawl.

By way of a Program Environmental Impact Report (PEIR) the Sacramento Municipal Utility District (SMUD) is proposing to develop a Headquarters Campus Master Plan (HQCMC) which will guide the transition of SMUD’s 34-acre campus to a more active, sustainable and flexible land use. The SMUD campus is located in the northwest quadrant of the intersection of the United States Highway 50 (US-50) westbound off ramp and 65th St. The 20-year HQCMC proposes to replace a majority of the existing structures on the project site culminating a net increase of 113,000 square-feet (sf) of building space. New structures include a 40,000 sf innovation center, 25,000 sf utility building, 52,500 sf training center, and a 20,000 sf corporate center. The Department sent comments on October 17, 2017 during the review period for the Notice of Preparation. The following comments are based on the April 2018 DEIR.

Traffic Impact Study – Modeling Outputs and Vehicle Miles Traveled (VMT)

Caltrans has the following concerns regarding the modeling outputs in Appendix E – Traffic Modeling:

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California’s economy and livability"
Mr. Rob Ferrera / SMUD  
June 15, 2018  
Page 2

- On page 7 and page 17 of Appendix E the modeling output for Intersection 7 (65th Street/United States Highway 50 (US-50) ramps), per the Existing to Existing-Plus-Project Conditions AM peak hour scenario, the eastbound (EB) Level of Service (LOS) data reflects less congestion between the Existing and Existing-Plus-Project scenarios, from LOS D to LOS C although traffic demand is higher. Please provide an explanation to the phenomena described above.

- On page 11 and page 23 output for Intersection 7 (65th Street/United States Highway 50 (US-50 per the Existing to Existing-Plus-Project Conditions PM Peak Hour scenario, the eastbound (EB) Level of Service (LOS) data reflects worsening conditions. The project sponsor should identify mitigation to maintain the pre-project LOS.

- On page 32 and page 44 output for Intersection 2 (59th Street/US-50 ramps), per the Cumulative to Cumulative-Plus-Project Conditions PM peak hour scenario, the westbound LOS data reflects less congestion although traffic demand is higher. Please provide an explanation to the phenomena described above.

- Additionally, in the Existing-Plus-Project Conditions, Campus Generated Daily Vehicle Miles Traveled (VMT) per employee will increase from 22.49 (Table 3.10-3) to 23.41 (Table 3.10-13). It is suggested to provide van/car-pool parking spaces within the campus parking plan to encourage carpooling; therefore, reducing the potential for increased VMT in the plus-project conditions.

- Caltrans is concerned about off-ramp storage needs at all US-50 ramps at 59th and 65th Streets (Study Intersections 2, 7, and 8. Please provide a Length of Queue analysis at these off-ramps in order to ensure prevention of traffic spill-over on to the US-50 mainline- as a result of the proposed project.

Transportation Permit

Project work that requires movement of oversized or excessive load vehicles on State highways requires a transportation permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to Caltrans, Headquarters, Transportation Permits Office, 1823 14th Street, Sacramento, CA 95811-7119. See the following website for more information: http://www.dot.ca.gov/hq/traffops/permits/.

Encroachment Permit

Please be advised that any work or traffic control that would encroach onto the State Right of Way (ROW) requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to the address below.

Moe Azar  
California Department of Transportation

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California’s economy and livability."
Mr. Rob Ferrera / SMUD
June 15, 2018
Page 3

District 3 Office of Permits
703 B Street
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information. http://www.dot.ca.gov/hq/traffops/developserv/permits/.

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. If you have any questions regarding these comments or require additional information, please contact Arthur Murray by email at: arthur.murray@dot.ca.gov.

Sincerely,

JEFFEREY MORNEAU, Branch Chief
Office of Transportation Planning – South Branch

c. Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California’s economy and livability"
S1-1

This comment states the California Department of Transportation (Caltrans) objective in providing comments on the Draft EIR and summarizes the commenter’s understanding of the proposed HQCMP. The comment does not address the adequacy of the analysis of the EIR, and no further response is necessary.

S1-2

This comment expresses concern related to the change in level of service (LOS) between existing and existing-plus-project conditions at Intersection 7 (65th Street/S Street/US 50 WB Ramps) during the AM peak hour, as shown in Appendix E of the Draft EIR. Per the modeling conducted as part of the Draft EIR, the eastbound approach to intersection 7 (65th Street / US 50 WB ramps / S Street) is projected to improve from 36 second average delay and LOS D to 30 seconds and LOS C from Existing to Existing Plus Project. As specified in the Draft EIR on page 3.10-16, traffic operations were modeled using the SimTraffic software program, which is a stochastic microsimulation that analyzes the entire roadway system as a whole and the interactions between intersections. With simulation, there is some variation due to driver behavior and the timing of when vehicles arrive at each intersection. The reported results take an average of 10 simulations; however, there may still be minor variability due to the probabilistic nature of the methodology (as shown by the standard deviation provided for each vehicle delay result). Also, additional traffic may not increase delay for all movements uniformly; how signal phases are triggered and how long each phase lasts for opposing movements within the simulations may differ. Using this method, which is part of an approved/accepted model, individual approaches can show variabilities, such as the one noted by the commenter, and are not indicative of an error in the way the model was used or in the results. CEQA standards and evaluations look at operations for the overall intersection, not individual movements to an intersection. For the overall intersection, as opposed to the eastbound AM peak hour discussed above, the average delay does increase from 38 to 41 seconds per vehicle, remaining at acceptable LOS D. Accordingly, no modifications to the analysis or potential mitigation is required.
S1-3 This comment requests inclusion of potential mitigation to address “worsening LOS” conditions under existing-plus-project conditions at Intersection 7 (65th Street/S Street/US 50 WB Ramps) during the PM peak hour. The eastbound approach to the intersection worsens from 80 second average delay and LOS E to 113 seconds and LOS F. As noted in Tables 3.10-1 (on page 3.10-17 of the Draft EIR), 3.10-2 (on page 3.10-18 of the Draft EIR), and 3.10-12 (on page 3.10-38 of the Draft EIR), the methodology for calculating delay and LOS at signalized intersections is based on the traffic operations for the overall intersection (as opposed to individual movements to an intersection) consistent with state-of-the-practice methodologies for calculating intersection delays. The average delay for the overall intersection increases from 48 to 51, remaining at LOS D and within the acceptable LOS threshold. Accordingly, no mitigation is required.

S1-4 The comment expresses concern related to the change in LOS between cumulative and cumulative-plus-project conditions at Intersection 2 (59th Street/S Street/US 50 Ramps) during the PM peak hour. Please refer to Response to Comment S1-2, since the phenomenon described by the commenter is similar. As noted in Response to Comment S1-2, use of the SimTraffic software program determined there is some minor variability, specifically on a particular movement by movement basis, expected with simulation of traffic operations. The results show the westbound approach to the intersection would improve from a 94 second average delay and LOS F to 79 seconds and LOS E. Overall, the intersection remains at acceptable LOS E.

S1-5 The comment suggests provision of van/carpool spaces as part of the plan to reduce potential vehicle miles travelled (VMT) associated with SMUD operations at the Headquarters Campus. As specified in the significance criteria on page 3.10-27 of the Draft EIR, impacts are based on substantial increase in VMT per service population within the VMT influence area, and not based on specific Campus generated VMT. Table 3.10-14 of the Draft EIR shows that the development of the project would not create a significant impact; rather the daily VMT per service population in the influence area decreases. Further, as noted on page 67 of the HQCMP (SMUD 2018), SMUD, as part of the HQCMP, would provide facilities intended to promote alternative transportation, including parking for carpool and vanpool. As further noted on page 3.10-30 of the Draft EIR, 13 percent of HQCMP-related SMUD employees use existing carpool and vanpool opportunities at the SMUD campus. As a result, the HQCMP continues SMUD’s commitment to the provision for alternative modes of travel by its employees,
and vanpool/carpool parking would be provided as part of the HQCMP, and adoption of such facilities as a mitigation measure or measures would not, at any rate, alter the buildout of the campus.

S1-6

The comment requests queuing analyses for Intersections 2, 7, and 8. As noted on page 3.10-16 of the Draft EIR, a SimTraffic microsimulation model was used to evaluate operations at the study intersections. Output from this model was post-processed to determine project queue lengths at freeway off-ramps within the study area. The resulting maximum queue lengths are reported for existing and existing plus project conditions in Table 2-2, below.

Table 2-2  Freeway Off-Ramp Queuing – Existing Plus Project

<table>
<thead>
<tr>
<th>Freeway Off-Ramp</th>
<th>Storage Length (feet)</th>
<th>Maximum Queue Length (feet)</th>
<th>Existing Conditions</th>
<th>Existing Plus Project</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>AM Peak Hour</td>
<td>PM Peak Hour</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>AM Peak Hour</td>
<td>PM Peak Hour</td>
</tr>
<tr>
<td>US 50 EB Off-Ramp at 59th Street</td>
<td>1,650</td>
<td>475</td>
<td>250</td>
<td>475</td>
</tr>
<tr>
<td>US 50 WB Off-Ramp at 65th Street</td>
<td>1,225</td>
<td>475</td>
<td>450</td>
<td>650</td>
</tr>
<tr>
<td>US 50 EB Off-Ramp at 65th Street</td>
<td>1,300</td>
<td>250</td>
<td>200</td>
<td>325</td>
</tr>
</tbody>
</table>

Note: Maximum queue lengths were analyzed in SimTraffic. Results are an average of 10 simulation runs.

The reported results represent an average of 10 simulation runs. As shown, the queuing for each of the freeway off-ramps remains within the available storage length under both existing and existing plus project conditions.

Similarly, the maximum queue lengths are reported for cumulative no project and cumulative plus project conditions in Table 2-3, below.

Table 2-3  Freeway Off-Ramp Queuing – Cumulative Plus Project

<table>
<thead>
<tr>
<th>Freeway Off-Ramp</th>
<th>Storage Length (feet)</th>
<th>Maximum Queue Length (feet)</th>
<th>Cumulative No Project</th>
<th>Cumulative Plus Project</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>AM Peak Hour</td>
<td>PM Peak Hour</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>AM Peak Hour</td>
<td>PM Peak Hour</td>
</tr>
<tr>
<td>US 50 EB Off-Ramp at 59th Street</td>
<td>1,650</td>
<td>775</td>
<td>500</td>
<td>850</td>
</tr>
<tr>
<td>US 50 WB Off-Ramp at 65th Street</td>
<td>1,225</td>
<td>650</td>
<td>575</td>
<td>850</td>
</tr>
<tr>
<td>US 50 EB Off-Ramp at 65th Street</td>
<td>1,300</td>
<td>275</td>
<td>875</td>
<td>300</td>
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</table>

Note: Maximum queue lengths were analyzed in SimTraffic. Results are an average of 10 simulation runs.
As shown, there is an increase in queue lengths under cumulative conditions compared to existing conditions due to the overall growth in traffic in the study area; however, the project’s contribution to queues on the freeway off-ramps would not result in queues extending beyond the available storage and onto the freeway mainline. Based on this data, there would be no additional impacts to study intersections beyond those reported in the Draft EIR. Further, as documented on pages 4-14 and 4-15 of the Draft EIR, SMUD would provide a fair share contribution toward improvements at the intersection of 65th Street/US 50 Eastbound Ramps, which would further improve traffic operations at this location.

This comment outlines the application process for a transportation permit, which is required for the movement of oversized or excessive load vehicles on State highways. The process for applying for transportation permits, as it applies to construction at the project site, is noted. Prior to development of individual structures within the Headquarters Campus under the HQCMP, SMUD would apply for and acquire all necessary permits.

This comment outlines the application process for an encroachment permit that would be required for work within State right-of-way and requests that Caltrans be notified of future actions regarding the project. The process for applying for encroachment permits, as it applies to construction at the project site, is noted. Prior to development of individual structures within the Headquarters Campus under the HQCMP, SMUD would apply for and acquire all necessary permits. Further, SMUD will notice Caltrans regarding further actions in accordance with applicable requirements (including CEQA requirements), consistent with this request.
Local
This page intentionally left blank.
From: King Tunson <ktunson@sfd.cityofsacramento.org>
Sent: Tuesday, May 22, 2018 11:30 AM
To: Rob Ferrera
Subject: Sacramento Municipal Utility District HQ Campus Master Plan Draft EIR

.........CAUTION EXTERNAL SENDER: Do not open links/attachments if uncertain about the sender.........

Rob,

I don’t have any comment for the above-referenced document.

King Tunson
Entitlement Plan Review Supervisor
Sacramento Fire Department
5770 Freeport Blvd, Ste 200
Sacramento, CA 95822
Office (916) 808-1358
Fax (916) 808-1677
ktunson@sfd.cityofsacramento.org
<table>
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<th>Letter</th>
<th>Response</th>
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| L1     | **City of Sacramento Fire Department**  
         | King Tunson, Entitlement Plan Review Supervisor  
         | May 22, 2018 |

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<tbody>
<tr>
<td>This comment states that the City of Sacramento Fire Department has no comments. The comment does not address the adequacy of the analysis of the EIR, and no further response is necessary.</td>
</tr>
</tbody>
</table>
June 11, 2018

SENT VIA E-MAIL ONLY

Rob Ferrera
Sacramento Municipal Utility District
6201 S Street, MS B203
Sacramento, CA 95817-1899
rob.ferrera@smud.org

RE: Sacramento Municipal Utility District (SMUD) proposed Headquarters Campus Master Plan (HQCMP or project)

Dear Mr. Ferrera:

The Sacramento Municipal Utility District (SMUD) is proposing a Headquarters Campus Master Plan (HQCMP or project) to provide strategic direction and long-term planning of SMUD’s Headquarters Campus. Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) staff comments on the project follow.

Design comments:

1. Bicycle Parking Facilities
   a. The Sac Metro Air District recommends that SMUD meet or exceed the City of Sacramento’s policies for the project site if it would be subject to compliance with rules and regulations for new commercial development within the City of Sacramento.
   b. The project should include sufficient long-term bicycle parking for employees and short-term bicycle parking for visitors, in accordance with the Association for Bicycle and Pedestrian Professionals (APBP) Bicycle Parking Guidelines, 2nd Edition (2010)¹.
      i. The plan should also include bicycle parking and/or space for hubs (with electrical service) for Bicycle Sharing systems such as the Sacramento JUMP Bike system.
   c. The HQCMP should include policies to require new and remodeled buildings to include end-of-trip facilities such as showers and lockers for use by employees that bike, walk, or use transit to commute to work.

2. Bicycle Routes
   a. North/South Connectivity–Sac Metro Air District notes that the SMUD Headquarters site currently has a rail undercrossing in the center of the HQCMP. This undercrossing should be made accessible to the public for

¹ Bicycle Parking Guidelines, 2nd Edition: This document consists of a set of recommendations from the Association of Pedestrian and Bicycle Professionals with guidance on best practices for promoting bicycling for transportation. The document is available online at: https://www.apbp.org/page/Bike_Parking
b. **Future Bicycle/Pedestrian facilities:** The design for future bicycle and pedestrian facilities within and adjacent to the HQCMP should include signage and pavement with specialized textures, colors, or materials to signify their purpose as a publicly available routes of travel for bicyclists or pedestrians.

3. **Permeable Pavement**
   a. Highly developed urban areas characterized by a preponderance of impervious surfaces have less surface moisture available for evapotranspiration than natural ground cover. This characteristic contributes to higher surface and air temperatures, known as heat island effect, which can increase formation of ozone. To reduce this effect, the Sac Metro Air District recommends the use of permeable pavement to the greatest extent possible for the paved areas on the HQCMP.

4. **Transit**
   a. The Sac Metro Air District notes that the HQCMP includes a new customer service center adjacent to the existing Sacramento Regional Transit (RT) light rail station at 59th street. The Sac Metro Air District recommends that SMUD work with RT to ensure that current and future transit service is not negatively impacted by the short-term impacts from construction or long-term impacts from expansion and modification of the SMUD HQ campus. The final design for the HQCMP should include facilities/amenities that support and enhance the experience for existing and future transit users.

5. **Tree shading**
   a. Sac Metro Air District notes that the proposed project includes the elimination of existing trees, some of which provide substantial canopy shading. If feasible the Sac Metro Air District encourages the project to include a sufficient number of trees to ensure substantial shade coverage of outdoor walkways and facades, terraces, and along the projects perimeters. Trees clean the air, reducing carbon, ozone, and particulate matter in the atmosphere.

**DEIR Comments:**

1. Sac Metro Air District recommends that SMUD include cool roofs as a greenhouse gas emissions mitigation measure for new buildings and significant re-roofing projects within the HQCMP.

2. Sac Metro Air District recommends that SMUD adopt policies to reduce organic (food and green) waste from existing and new facilities within the HQCMP.

3. Sac Metro Air District recommends that SMUD develop a policy for implementing greywater systems for new buildings and major retrofits of existing buildings within the HQCMP.

4. All projects are subject to Sac Metro Air District rules at the time of construction. Specific rules that may relate to construction activities are attached. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800.
Please contact me at 916-874-2694 or jhurley@airquality.org if you have any questions regarding these comments.

Sincerely,

-JJ Hurley

Joseph James Hurley
Associate Air Quality Planner/Analyst
Land Use & CEQA section-Communication, Land Use & Mobile Sources Division
Sacramento Metropolitan Air Quality Management District
jhurley@airquality.org
916.874.2694

Cc: Paul Philley, Sac Metro Air District
ATTACHMENT

Sac Metro Air District Rules & Regulations Statement (revised 6/2018)

The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District):

All projects are subject to Sac Metro Air District rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from Sac Metro Air District prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the Sac Metro Air District early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions. Portable construction equipment (e.g., generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a Sac Metro Air District permit or a California Air Resources Board portable equipment registration (PERP) (see Other Regulations below).

Rule 402: Nuisance. The developer or contractor is required to prevent dust or any emissions from onsite activities from causing injury, nuisance, or annoyance to the public.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residential water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.
Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 453: Cutback and Emulsified Asphalt Paving Materials. This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify Sac Metro Air District of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Other Regulations (California Code of Regulations (CCR))

17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos: The developer or contractor is required to notify Sac Metro Air District of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program: The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling: Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.
This comment recommends that SMUD meet or exceed City of Sacramento policies/requirements related to bicycle parking. While SMUD, as a public utility company, would not be subject to local jurisdiction rules and regulations for utility infrastructure, SMUD is required to follow these City rules and regulations, including bicycle parking requirements, for development of office and other related uses within the Headquarters Campus. As noted on page 2-14 of the Draft EIR, SMUD would comply with existing City requirements, including zoning code and development standards, and would provide a minimum of 1,025 spaces campus-wide, consistent with the recommendation made in this comment.

The comment requests provision of onsite, long-term and short-term bicycle parking in accordance with the Association of Pedestrian and Bicycle Professionals’ Bicycle Parking Guidelines. As projects are proposed under the HQCMP, the required level of parking, including bicycle parking, would be evaluated and provided in accordance with City and other applicable requirements, which may include the provision of facilities related to bicycle sharing systems. As noted on page 3.10-30 of the Draft EIR, SMUD anticipates an additional 75 employees would bike to and from the Headquarters Campus each day. As stated on page 3.10-41 of the Draft EIR, these additional bicycle commuters would be accommodated by existing bicycle facilities (i.e. along 59th Street north of S Street, and 65th Street) and proposed Class I bike paths on S Street and through the Headquarters Campus as part of the project. Additional bicycle parking would be provided at the Community Energy/Innovation Center for visitors in accordance with City requirements. As noted above in Response to Comment L2-1, a minimum of 1,025 bicycle parking spaces would be provided on campus with implementation of the HQCMP.

This comment requests inclusion of policies within the HQCMP to require end-of-trip facilities, such as showers and lockers for bicyclists. This comment does not address the adequacy of the Draft EIR. While no further response is necessary, it is important to note that SMUD already provides end-of-trip facilities on campus. Further, as noted above in Response to Comment L2-1, SMUD would comply with existing City requirements, including building code requirements related to the provision of shower/changing facilities for employees.
L2-4 This comment requests that the existing undercrossing of the Sacramento Regional Transit (SacRT) line be made accessible to the public. This comment does not address the adequacy of the Draft EIR and no further response is necessary. However, it is important to note that SMUD conducts critical functions in the core of the campus related to maintaining the electrical grid, and therefore security concerns prohibit provision of public access via the existing undercrossing. The undercrossing will, however, continue to be utilized by SMUD staff.

L2-5 This comment requests signage and unique colored/textured pavement for bicycle and pedestrian facilities. This comment does not address the adequacy of the Draft EIR. However, within the Headquarters Campus, such considerations (including the potential use of decomposed granite along pedestrian pathways) would be made and are included, as noted on page 60 of the HQCMP (SMUD 2018). Within public roadways adjacent to the Headquarters Campus, the provision of specialized coloring, textures, and signage to denote pedestrian and bicycle facilities is within the jurisdiction of the City of Sacramento and is subject to the City’s existing plans and policies, including the City’s Bicycle Master Plan and the 65th Street Station Area Plan.

L2-6 The comment requests consideration of permeable pavement with future development under the HQCMP. This comment does not address the adequacy of the Draft EIR. However, such considerations are already included as part of the HQCMP (refer to page 72 of the HQCMP [SMUD 2018]) and would be considered as individual projects are designed/constructed.

L2-7 The comment requests that SMUD coordinate with SacRT regarding the 59th Street light rail station and consider the station in its subsequent design and construction. SMUD will coordinate with SacRT during implementation of the HQCMP, and as noted on page 99 of the HQCMP (SMUD 2018), the plan considers the interaction between campus uses and the 59th Street light rail station. This comment does not address the adequacy of the Draft EIR and no further response is necessary.

L2-8 The comment requests that SMUD encourage the planting and maintenance of trees onsite. The HQCMP includes multiple guidelines and policies intended to maintain (where possible) and expand trees/shade cover on the project site for both shading and screening purposes. Further, SMUD is in the process of developing an Urban Forest Plan for the Headquarters Campus that will further SMUD’s efforts, consistent with the request made by the Sacramento
Metropolitan Air Quality Management District (SMAQMD). This comment does not address the adequacy of the Draft EIR and no further response is necessary.

L2-9 This comment recommends that SMUD include cool roofs as a potential greenhouse gas (GHG) emission reduction measure. The last bullet of Mitigation Measure 3.1-6b pertains to site design considerations that can be made to reduce the heat island effect and includes the potential use of cool roofs, consistent with this request.

L2-10 This comment recommends that SMUD include policies to reduce organic waste on-campus. Mitigation Measure 3.1-6b on page 3.6-27 of the Draft EIR identifies a series of actions that could be taken by SMUD to achieve target GHG reductions. In particular, the sixth bullet of potential actions pertains to waste generated on-campus, including organic waste, consistent with this request.

L2-11 This comment recommends that SMUD include a policy for implementing grey water systems on campus. The third to last bullet of Mitigation Measure 3.1-6b pertains to potential installation/operation of a grey water system onsite, consistent with this request.

L2-12 The comment notes that several SMAQMD rules may apply to the HQCMP. Section 3.2.1, “Regulatory Setting,” of the Draft EIR contains adopted SMAQMD rules and regulations that may apply to the project. Consistent with existing practice, SMUD would comply with existing SMAQMD rules that apply to actions related to the HQCMP, where appropriate.
Interested Parties
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June 11, 2018

Mr. Rob Ferrera
Sacramento Municipal Utility District
P.O. Box 15830, MS H201
Sacramento, CA 95852

Re: SMUD Headquarters Campus Master Plans

Dear Mr. Ferrera:

Thank you for giving us the opportunity to review your plans. The proposed SMUD campus master plan proposal is within the same vicinity of PG&E existing operating facilities that serve this property. PG&E has existing gas distribution facilities that serve several areas of the proposed re-development location. Please contact PG&E’s Service Planning department for any modification, relocation, and mapping requests or for any additional services you may require: www.pge.com/eco. As well, the draft EIR has been forwarded on to PG&E’s environmental department.

Please remember to contact Underground Service Alerts (USA) by calling 811 prior to commencing any construction activities so all underground utilities can be accurately located and marked.

If you have any questions regarding our response, please contact me at john.spigott@pge.com.

Sincerely,

John Spigott
Land Management
925-328-5122
I1-1 This comment states that Pacific Gas & Electric (PG&E) has existing gas distribution facilities in the area and requests that SMUD contact PG&E if location identification, modification, or relocation of PG&E facilities is required. Should construction of specific projects undertaken as part of HQCMP implementation occur proximate to or require consideration of PG&E facilities, SMUD will coordinate with PG&E before construction to appropriately identify, avoid, modify, or relocate PG&E facilities. The comment does not address the adequacy of the analysis of the EIR, and no further response is necessary.
3 Corrections and Revisions to the Draft EIR

This chapter contains changes to the text of the Draft EIR as initiated by SMUD staff. The changes are presented in the order in which they appear in the Draft EIR and are identified by Draft EIR page number. Text deletions are shown in strikeout (strikeout) and additions are shown in double underline (double underline). The Draft EIR as amended through responses to comments and the Final EIR, is included as Attachment A to this document. The changes identified below do not alter the conclusions of the EIR with respect to any of the significant impacts of the project and do not necessitate recirculation of the Draft EIR.

3.1 Revisions to the Executive Summary

To provide clarification, the first sentence under Mitigation Measure 3.4-2 on page ES-16 is revised as follows:

Mitigation Measure 3.4-2: Maintain consistency with city of Sacramento tree ordinance.

Upon approval certification of the HQCMP EIR and prior to on-site construction activities involving tree removal, SMUD shall prepare a Landscape Inventory Report (LIR) for the Headquarters Campus Master Plan Area, for those areas not covered under the Headquarters Building and Site Cultural Landscape Report (SMUD 2014).

To provide clarification, the first sentence under the heading “On-site GHG Reduction Measures” of Mitigation Measure 3.6-1b on page ES-22 is revised as follows:

On-site GHG Reduction Measures

The project, as proposed, includes a series of measures that would reduce energy use and GHG emissions associated with new/reconstructed facilities that are part of the HQCMP.

3.2 Revisions to the Section 3.4, “Biological Resources”

To provide clarification, the first sentence under Mitigation Measure 3.4-2 on page 3.4-14 is revised as follows:

Mitigation Measure 3.4-2: Maintain consistency with city of Sacramento tree ordinance.

Upon approval certification of the HQCMP EIR and prior to on-site construction activities involving tree removal, SMUD shall prepare a Landscape Inventory Report (LIR) for the Headquarters Campus Master Plan Area, for those areas not covered under the Headquarters Building and Site Cultural Landscape Report (SMUD 2014).
3.3 Revisions to the Section 3.6, “Greenhouse Gas Emissions, Climate Change, and Energy”

To provide clarification, the first sentence under the heading “On-site GHG Reduction Measures” of Mitigation Measure 3.6-1b on page 3.6-27 is revised as follows:

**On-site GHG Reduction Measures**

The project, as proposed, includes a series of measures that would reduce energy use and GHG emissions associated with new/reconstructed facilities that are part of the HQCMP.
4 Mitigation Monitoring and Reporting Program

This mitigation monitoring and reporting program (MMRP) summarizes the mitigation measures, implementation schedule, and responsible parties for monitoring the mitigation measures required of the proposed Headquarters Campus Master Plan (HQCMP) as set forth in the environmental impact report (EIR) prepared for the project.

Section 21081.6 of the California Public Resources Code and Section 15091(d) and Section 15097 of the State CEQA Guidelines require public agencies “to adopt a reporting or monitoring program for changes to the project which it has adopted or made conditions of project approval to mitigate or avoid significant effects on the environment.” An MMRP is required for the project because the EIR for the project identified potentially significant adverse impacts related to construction and operation of the project, and mitigation measures have been identified to reduce most of those impacts to a less-than-significant-level.

This MMRP will be adopted by the Sacramento Municipal Utility District (SMUD) Board of Directors when it approves the project and will be kept on file at SMUD’s Customer Service Center at 6301 S Street, Sacramento, CA 95817. SMUD will use this MMRP to ensure that identified mitigation measures, adopted as a condition of project approval, are implemented appropriately.

4.1 Mitigation Implementation and Monitoring

SMUD will be responsible for monitoring the implementation of mitigation measures designed to minimize impacts associated with the 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 project meets the requirements of this MMRP 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 and its appointed contractor 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 4-1 lists each identified environmental resource being
affected (in the same order and using the same numbering system as in the EIR), the associated CEQA checklist question (used as the thresholds of significance in the EIR), the corresponding monitoring and reporting requirement, the party responsible for ensuring implementation of the mitigation measure and monitoring effort, and the project component to which the mitigation measure applies.

If an issue addressed in the EIR does not result in mitigation, it is not included in the table.

4.2 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.

4.3 Reporting

SMUD shall, or may require the developer to, prepare a monitoring report upon completion of the project describing the compliance of the activity with the required mitigation measures. Information regarding inspections and other requirements shall be compiled and explained in the report. The report shall be designed to simply and clearly identify whether mitigation measures have been adequately implemented. At a minimum, each report shall identify the mitigation measures or conditions to be monitored for implementation, whether compliance with the mitigation measures or conditions has occurred, the procedures used to assess compliance, and whether further action is required. The report shall be presented to SMUD’s Board of Directors.

4.4 Mitigation Monitoring and Reporting Program Table

The categories identified in the attached MMRP table are described below.

**Checklist Section** – This column identifies which CEQA issue area the mitigation measure is attributed to in the EIR.

**Impact** – This column provides the verbatim text of the identified impact.

**Mitigation Measure** – This column provides the verbatim text of the adopted mitigation measure.

**Implementation Duration** – This column identifies when the mitigation measure shall be implemented (e.g., before construction, during construction, before occupancy, etc.).

**Monitoring Duration** – This column identifies the period within which monitoring shall be conducted.
Responsibility – This column identifies the party(ies) responsible for implementation and/or enforcing compliance with the requirements of the mitigation measure.

Applicable Project Component – This column identifies with what component/project under the HQCMP or under what conditions the mitigation measure should be implemented (e.g., during high wind conditions, construction within wetlands, etc.).
### Table 4-1 Mitigation Monitoring and Reporting Program

<table>
<thead>
<tr>
<th>Checkpoint Section</th>
<th>Environmental Criteria</th>
<th>Mitigation Measure</th>
<th>Implementation Duration</th>
<th>Monitoring Duration</th>
<th>Responsibility</th>
<th>Applicable Project Component</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Aesthetics and Visual Resources</td>
<td>Would the project introduce new sources of light or glare?</td>
<td>Mitigation Measure 3.1-2: Lighting standards. All new outdoor lighting shall utilize directional lighting methods with shielded and cutoff type light fixtures to minimize glare and direct light downward to prevent light trespass outside the project boundary.</td>
<td>During project design and construction.</td>
<td>One time before issuance of building permits by City of Sacramento.</td>
<td>SMUD; SMUD; City of Sacramento</td>
<td>All project components.</td>
</tr>
<tr>
<td>3.2 Air Quality</td>
<td>Would the project cause construction-generated criteria air pollutant or precursor emissions to exceed the SMAQMD-recommended thresholds of 85 lb/day for NOx, 80 lb/day and 14.6 tons/year for PM10, and 62 lb/day and 15 tons/year for PM2.5, and uncontrolled construction-related dust emissions?</td>
<td>Mitigation Measure 3.2-1: Incorporate dust control measures. During all construction activities, the construction contractor shall comply with the following measures: 1. Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads. 2. Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered. 3. Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited. 4. Limit vehicle speeds on unpaved roads to 15 miles per hour (mph) or to the extent feasible. 5. All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.</td>
<td>Include dust control measures as part of construction specifications to be then implemented by contractor during all construction activities.</td>
<td>Before and during construction.</td>
<td>Contractor</td>
<td>SMUD; Contractor</td>
</tr>
<tr>
<td>3.3 Archaeological, Historical, and Tribal Cultural Resources</td>
<td>The SMUD Headquarters Landscape is listed in the NRHP. Would the project alter or destroy character-defining elements of the landscape?</td>
<td>Mitigation Measure 3.3-2: Prepare landscape rehabilitation plan. Before completion of final site design for enhancements (e.g., benches, walkways, etc.) to existing landscaped areas to the west and east of the Headquarters Building, SMUD shall complete a plan for the treatment of the historic Headquarters Landscape. The plan shall be prepared by a landscape architect who complies with the Secretary's Standards. Because of the need to alter or add to this historic property to meet continuing or changing uses while retaining the property's historic character, the plan will be a rehabilitation plan as defined in the Secretary of the Interior's Standards for the Treatment of Historic Properties. Per the Guidelines for the Treatment of Cultural Landscapes, a successful Landscape Rehabilitation Plan will see that the character-defining features and materials of a historic landscape are protected and maintained, but also allows for an opportunity to make possible an efficient contemporary use through alterations and additions. The plan shall illustrate how to apply the rehabilitation treatments in a way that meets the Secretary's Standards.</td>
<td>Preparation of plan during project design. Implementation of measures outlined in plan during construction.</td>
<td>During project design and construction.</td>
<td>Contractor</td>
<td>SMUD</td>
</tr>
<tr>
<td>3.3 Archaeological, Historical, and Tribal Cultural Resources</td>
<td>Would the project uncover previously unknown human remains?</td>
<td>Mitigation Measure 3.3-3: Halt ground-disturbing activity upon discovery of human remains. If human remains are discovered during any demolition/construction activities, potentially damaging ground-disturbing activities within 100 feet of the remains shall be halted immediately, and the project applicant shall notify the Sacramento County coroner and the NAHC immediately, according to Section 907.38 of the PRC and Section 7052.3 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. Following the coroner’s and NAHC’s findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the</td>
<td>During construction.</td>
<td>During construction.</td>
<td>Contractor; SMUD</td>
<td>SMUD; qualified archaeologist with Native American burial experience</td>
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</tbody>
</table>
Table 4-1  Mitigation Monitoring and Reporting Program

<table>
<thead>
<tr>
<th>Checklist Section</th>
<th>Environmental Criteria</th>
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<th>Applicable Project Component</th>
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</thead>
<tbody>
<tr>
<td>3.4 Archaeological, Historical, and Tribal Cultural Resources</td>
<td>Would the project uncover previously unknown paleontological resources?</td>
<td>Mitigation Measure 3.3-4: Avoid destruction of paleontological resources.</td>
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<td>1. The project applicant shall retain a qualified paleontologist to conduct on-site training that will alert all construction personnel and operational staff involved in equipment training about the possibility of encountering fossils. The appearance and types of fossils likely to be seen during construction will be described. Construction personnel shall be trained about the proper notification procedures should fossils be encountered.</td>
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<td>2. If paleontological resources are discovered during earthmoving activities, including on-site training activities, the project applicant shall immediately halt operations within 100 feet of the find and notify the applicant. The applicant shall retain a qualified paleontologist for identification and salvage of fossils so that construction delays can be minimized. If large specimens are discovered, the paleontologist shall have the authority to halt or divert grading and construction equipment while the finds are removed. The paleontologist shall be responsible for implementing all tasks summarized below:</td>
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<tr>
<td>3.4 Biological Resources</td>
<td>Would the project result in construction disturbances that could cause Swainson's hawk, white-tailed kite, or other avian species to abandon their nests, if located nearby?</td>
<td>Mitigation Measure 3.4-1: Avoid disturbance of active nests.</td>
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<td>Bird nesting season typically is from February 1 through August 31. Construction activities (including vegetation clearing) conducted outside of the nesting bird season would not disturb nesting birds. Therefore, SMUD, if possible, will schedule construction activities that could occur proximate to nesting bird habitat outside of the nesting season. If construction will occur during the nesting season, a SMUD project biologist/biological monitor will conduct pre-construction nesting bird surveys to determine if birds are nesting in the work area. The pre-construction nesting bird surveys will identify on-site bird species and any nest-building behavior.</td>
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<td>• If no nesting birds are found in or within 500 feet of the project site during the pre-construction clearance surveys, construction activities may proceed as scheduled.</td>
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<td>• If pre-nesting behavior is observed, but an active nest has not yet been established (e.g.,</td>
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<td>Conduct nesting surveys before the start of construction activities and during the breeding season before tree removal that will occur during the nesting season (March 1 through</td>
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<td>Before the start of construction activities, if scheduled between February 1 and August 31.</td>
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</tbody>
</table>

- SMUD; qualified paleontologist
- SMUD; qualified paleontologist
- All project components.
Table 4-1 Mitigation Monitoring and Reporting Program

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</tr>
</thead>
<tbody>
<tr>
<td>3.4 Biological Resources</td>
<td>Would the project conflict with provisions of the Sacramento City Code intended to protect biological resources?</td>
<td>Mitigation Measure 3.4-2: Maintain consistency with city of Sacramento tree ordinance. Upon certification of the HQCMP EIR and before on-site construction activities involving tree removal, SMUD shall prepare a Landscape Inventory Report (LIR) for the Headquarters Campus Master Plan Area, for those areas not covered under the Headquarters Building and Site Cultural Landscape Report (SMUD 2014). This mitigation requirement may also be satisfied through preparation of an Urban Forest Plan for the campus. Before removal of on-site trees associate with a phase of development under the HQCMP, SMUD shall submit a tree permit application to the City’s Director of Department of Public Works for any trees within the permitting requirements that may be removed, pruned, or otherwise modified by project activities. The tree permit application will identify all tree removals, prunings, or modifications that are expected to occur as a result of project implementation. The application will also be accompanied by a tree replacement plan, consistent with ratios outlined in the City’s ordinance, for any proposed tree removals, if deemed necessary by the Director of Parks and Recreation for the City of Sacramento. A certified arborist shall approve all work plans before submittal to the City. Replacement trees will be planted on-site and incorporated into the landscape plans of the project. Tree planting will comply with the City’s landscaping requirements (Sacramento City Code Sections 17.612.010 and 17.612.040). SMUD’s contractor shall erect protective fencing with tree protection signs around all trees (or tree groups) to be preserved during construction activities. The protective fence will be installed at the limits of the tree protection zone, usually the dripline of the tree or as defined by the project arborist or biologist. This will delineate the tree protection area and prevent unwanted activity in and around the trees and will reduce soil compaction in the root zones of the trees and other damage from heavy equipment. SMUD contractor will maintain the fence to keep it upright, taut, and aligned at all times. Fencing will be removed only after all construction activities are complete. Canopy or root pruning of any retained protected trees to accommodate construction and/or fire lane access will conform to the techniques and standards in the current edition of ANSI A300 (Tree, Shrub and Other...</td>
<td>Prepare an LIR after approval of the HQCMP, but before initiation of any construction activities related to HQCMP. Before specific construction activities, obtain permit for protection/removal of trees during construction. Replace removed trees as part of construction. Monitor compliance with tree removal and replacement permits.</td>
<td>SMUD</td>
<td>SMUD</td>
<td>All project components.</td>
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### Table 4-1 Mitigation Monitoring and Reporting Program

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<td>3.5 Geology and Soils</td>
<td>Would the project result in substantial soil erosion or the loss of topsoil?</td>
<td><strong>Mitigation Measure 3.5-1: Prepare and implement a stormwater pollution prevention plan.</strong> Before any ground-disturbing activities begin, the SMUD contractor shall apply for and maintain coverage under the General Construction Storm Water Permit. The contractor shall prepare and implement a SWPPP, including an erosion control plan that includes erosion control measures and construction waste containment measures to ensure that waters of the United States and the State are protected during and after project construction. The SWPPP shall include site design measures to minimize offsite stormwater runoff that might otherwise affect surrounding habitats. The Central Valley Regional Water Quality Control Board (RWQCB) will review and monitor the effectiveness of the SWPPP through mandatory reporting by SMUD and the contractor as required. The SWPPP shall be prepared with the following objectives: (a) identify all pollutant sources, including sources of sediment, that may affect the quality of stormwater discharges from the construction of the project; (b) identify BMPs that effectively reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the site during construction to the Best Available Technology/Best Control Technology standard; (c) provide calculations and design details as well as BMP controls for site run-on that are complete and correct; (d) identify project discharge points and receiving waters; and (e) provide stabilization BMPs to reduce or eliminate pollutants following construction. The contractor shall implement the SWPPP, including all BMPs, and perform inspections of all BMPs during construction. Potential SWPPP BMPs could include, but would not be limited to the following: • preserve existing vegetation where possible; • surface roughening of final grades to prevent erosion, decrease run-off, increase infiltration, and aid in vegetation establishment; • riparian buffers or filter strips along the perimeter of the disturbed area to intercept pollutants before offsite discharge; • placing fiber rolls around on-site drain inlets to prevent sediment and construction-related debris from entering inlets; • placing fiber rolls along down-gradient disturbed areas of the site to reduce runoff flow velocities and prevent sediment from leaving the site; • placing silt fences down-gradient of disturbed areas to slow down runoff and retain sediment; • stabilizing the construction entrance to reduce the tracking of mud and dirt onto public roads by construction vehicles; • staging excavated and stored construction materials and soil stockpiles in stable areas and covering materials to prevent erosion; and • stabilizing temporary construction entrances to limit transport/introduction of invasive species and control fugitive dust emissions.</td>
<td>Prepare SWPPP before any ground-disturbing activities begin; implement SWPPP, including all BMPs, and perform inspections of all BMPs during construction.</td>
<td>Contractor</td>
<td>SMUD; Contractor’s qualified stormwater professional; Central Valley RWQCB</td>
<td>All project components.</td>
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| **3.5 Geology and Soils** | Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | Mitigation Measure 3.5-2: Conduct a site-specific geotechnical investigation. Prior to final design of the project, the contractor shall complete a site-specific geotechnical investigation and report for the project, to be prepared by a California Registered Civil Engineer or Geotechnical Engineer. The purpose of the report will be to set forth design and construction measures intended to ensure site stability in compliance with applicable seismic and building codes. All design and construction measures provided in the geotechnical report prepared for the project shall be followed, as applicable. The report shall address and make recommendations on the following:  
  - road, pavement, and parking area design;  
  - structural foundations;  
  - grading practices;  
  - erosion/winterization;  
  - special problems discovered onsite (e.g., groundwater, expansive/unsuitable soils); and  
  - slope stability. | Complete site-specific geotechnical investigation and report prior to final design of the project; Implement all measures provided in the geotechnical report during project design and construction. | During project design and construction. | Contractor; Registered Civil Engineer or Geotechnical Engineer | SMUD; All project components. |
| **3.6 Greenhouse Gas Emissions, Climate Change, and Energy** | Would the project generate substantial contributions to cumulative emissions related to global climate change and state GHG reduction targets? | Mitigation Measure 3.6-1a: GHG reduction commitment.  
SMUD shall incorporate a combination of on-site and, if necessary off-site, GHG reduction measures to compensate the project’s GHG emissions by a total of 1,666 MT CO2e/year, thus resulting in no net increase in GHG emissions over conditions existing without the proposed project. SMUD shall designate a qualified energy professional to prepare a GHG reduction plan to track and ensure that this performance standard is met. Continued improvements of on-site equipment and reductions in GHG emissions from project design and equipment can be counted to meet this measure. For example, depending on specific equipment chosen to upgrade the central plant, GHG emissions savings may vary. When improvement plans are prepared, and specific technology is chosen, the GHG emissions savings shall be quantified and applied to meet this requirement. | During project design and construction. | During project design and construction. | SMUD; qualified energy professional | SMUD; qualified energy professional | All project components that contribute to greenhouse gas emissions. |
| | | Mitigation Measure 3.6-1b: On-site GHG reduction measures.  
To reduce GHG emissions associated with construction and operation of the proposed improvements associated with the SMUD HQCMP, the following on-site GHG reduction measures shall be incorporated into project design of each proposed structure, to the extent feasible:  
**Construction Phase GHG Reduction Measures:**  
- Use alternative fuels for generators at construction sites such as propane or solar, or use electrical power. To the extent feasible, all diesel-powered construction equipment shall be fueled with renewable diesel fuel. The renewable diesel fuel purchased for use in construction equipment must be compliant with CARB fuel pathways for renewable diesel (i.e., diesel sourced from 100 percent renewable sources).  
- Implement a construction-worker carpool and transit program to encourage construction workers to carpool and use public transit to commute to and from the project site. The program shall include a virtual or real "ride board" for workers to organize car pools. The program shall also reimburse workers for any expenses they incur from using local public transit to commute to the construction site.  
- Install a temporary electric power connection at the construction site to power any electric power equipment used during project construction (e.g., welders, lights) in lieu of any stationary generators powered by fossil fuels. | During project design and construction. | During project design and construction. | SMUD; qualified energy professional | SMUD; qualified energy professional | All project components that contribute to greenhouse gas emissions. |
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<td>Recycle or salvage non-hazardous construction and demolition debris (goal of at least 75 percent by weight) and use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products utilized should be certified through a sustainable forestry program.</td>
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<td>Minimize the amount of concrete for paved surfaces, utilize permeable and/or cool paving surfaces or utilize a low carbon concrete option.</td>
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<td>On-site GHG Reduction Measures</td>
<td>The project, as proposed, includes a series of measures that would reduce energy use and GHG emissions associated with new/reconstructed facilities that are part of the HQCMP. Section 5.5, “Sustainable Architectural Strategies” of the HQCMP provides a series of design strategies to be considered for integration into new SMUD facilities on the headquarters campus. The following design measures would achieve GHG reductions above and beyond the strategies already set forth in the HQCMP and are framed in consideration of CEC energy policy goals of achieving Zero Net Energy for all new non-residential buildings built after 2030 (CEC 2014).</td>
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<td>Adopt the CALGreen Tier 1 voluntary measures for nonresidential buildings (Appendix A5 of the California Code of Regulations Title 24, Part 11) that provide specific performance standards for each measure.</td>
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<td>Design new buildings to meet a Zero Net Energy or Zero Net Carbon standard. The following design measures could be implemented to support the above measures and achieve further GHG reductions during project implementation.</td>
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<td>Minimize on-site parking availability.</td>
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<td>Implement an employee commute VMT reduction target of 15 percent or more over current employee VMT.</td>
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<td>Overall increase in on-site renewable energy sources.</td>
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<td>Ensure that all appliances and fixtures installed in buildings developed or redeveloped as part of the project are Energy Star®-certified if an Energy Star®-certified model of the appliance is available. Types of Energy Star®-certified appliances include boilers, ceiling fans, central and room air conditioners, clothes washers, compact fluorescent light bulbs, computer monitors, copiers, consumer electronics, dehumidifiers, dishwashers, external power adapters, furnaces, geothermal heat pumps, programmable thermostats, refrigerators and freezers, residential light fixtures, room air cleaners, transformers, televisions, vending machines, ventilating fans, and windows (EPA 2017b).</td>
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<td>Install electric tankless, rooftop solar water heating system(s), or other more efficient alternatives to traditional natural gas heating systems.</td>
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<td>Consider setting a zero waste-to-landfill goal for SMUD operations, which may include a composting program and reuse/recycling measures.</td>
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<td>To reduce indoor water use by installing low-flow plumbing fixtures.</td>
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<td>Reduce outdoor water use by reducing turf area and use water-efficient irrigation systems (i.e., smart sprinkler meters) and landscaping techniques/design, installing rain water capture systems.</td>
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<td>If feasible, install a grey water system to irrigate outdoor landscaping and/or to use for indoor non-potable water uses.</td>
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<td>• Use drought tolerant plants in landscaped areas, where feasible (does not apply to orchard area).</td>
<td>Mitigation Measure 3.6.1c: Off-site GHG reduction commitment.</td>
<td>After implementation of other on-site GHG reduction measures.</td>
<td>SMUD</td>
<td>All components that contribute to GHG emissions.</td>
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<td>• Incorporate site design features to reduce on-site heat island effect including wall shading.</td>
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**Mitigation Measure 3.6.1c: Off-site GHG reduction commitment.**

If after incorporation of all feasible on-site GHG reduction measures, project GHG emissions are not reduced to zero, SMUD shall purchase carbon credits to offset the level of project-related GHG emissions remaining after implementation of the feasible on-site measures identified above. The GHG plan shall include calculation of carbon credits that SMUD shall purchase from The Climate Registry or a CARB-approved offset project to reduce net project-related GHG emissions. This measure is consistent with State CEQA Guidelines Section 15126.4(c)(3), which states that measures to mitigate the significant effects of GHG emissions may include “off-site measures, including offsets that are not otherwise required...”

The quantity of carbon credits purchased by SMUD to offset the project’s operational GHG emissions shall be estimated based on annual mass of GHG emissions, less the reductions achieved by implementation of on-site operational GHG emission reduction measures described above, multiplied by an operational life of 25 years. The GHG reduction plan shall demonstrate the quantified reductions in operational GHG emissions achieved by implementation of these measures.

3.7 Hazards and Hazardous Materials

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

**Mitigation Measure 3.7.1: Treatment/disposal of contaminated soils and materials.**

To reduce health hazards associated with potential exposure to hazardous substances, SMUD and/or its construction contractors shall implement the following measures before initiation of construction activities within 250 feet of the former Kramer Carton building and former linen facility:

- SMUD shall retain a licensed contractor to identify and remove any USTs and other equipment associated with historic uses at the former Kramer property and former linen facility. Such removal shall occur in accordance with Sacramento County Environmental Management Department and RWQCB regulations, including SWRCB regulations outlined in CCR Title 23, Division 3, Chapter 16. These regulations establish separate monitoring requirements for existing USTs; establish uniform requirements for unauthorized release reporting and for repair, upgrade, and closure of USTs; and specify variance request procedures. The appropriate federal, state, and local agencies shall be notified if evidence of previously undiscovered soil or groundwater contamination (e.g., stained soil, odorous groundwater) is encountered during construction activities.

- SMUD shall retain a qualified environmental professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted consistent with applicable regulations. The environmental professional shall prepare a report that includes but is not limited to activities performed for the assessment, a summary of anticipated contaminants and contaminant concentrations at the project site, and recommendations for appropriate handling of any contaminated materials during construction. Any contaminated areas shall be remediated in accordance with recommendations made by the Sacramento County Environmental Management Department, Central Valley RWQCB, DTSC, or other appropriate federal, state, or local regulatory agencies.

- The former Kramer property and former linen facility shall not be redeveloped prior to discontinuation of operation of the childcare center.
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<td>3.10 Transportation and Traffic</td>
<td>Would the project adversely affect existing or planned pedestrian facilities?</td>
<td>Mitigation Measure 3.10-4: Contribute fair share fee toward planned bicycle improvements. Prior to the completion of Phase 3 of the HQCMP, SMUD shall coordinate with the City of Sacramento to ensure adequate contribution of fair share bicycle and pedestrian improvement fees at the following impacted road segments identified in the City of Sacramento Bicycle Master Plan: • Folsom Boulevard between 57th Street and 59th Street • 59th Street (Folsom Boulevard to South of S Street) SMUD shall coordinate with the City of Sacramento and contribute a fair share contribution toward those improvements based on the projected increase in employee bicycle trips (75) under the HQCMP at buildout. Based on information provided in FHWA’s Capacity Analysis of Pedestrian and Bicycle Facilities and assuming a saturation flow rate of 2,000 bicycles/hour, a fair share contribution is estimated to be 3.75% of the estimated cost of the planned improvements along 59th and Folsom Boulevard near the SMUD Headquarters Campus at 20-year buildout. The fair share fee will be determined in accordance with the City of Sacramento’s fee formula and at a ratio and phasing commensurate with SMUD’s direct project impact on the proposed plan improvement areas.</td>
<td>Prior to operation of uses under Phase 3 of the HQCMP.</td>
<td>Prior to operation of uses under Phase 3 of the HQCMP.</td>
<td>SMUD</td>
<td>City of Sacramento</td>
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<td>3.11 Utilities and Service Systems</td>
<td>Would the project require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td>Mitigation Measure 3.11-1: Wastewater management. Prior to development of any phase/component of the HQCMP that would result in a net increase in stormwater/wastewater, SMUD shall provide the City’s Department of Utilities with sanitary sewer/stormwater studies specific to a specific HQCMP-related development for the City’s review and approval. In addition, SMUD shall remit to the City any Combined Sewer Development fees mandated by City Ordinance 2005-020 prior to development. Alternatively, SMUD may conduct a single sanitary sewer study for the entire HQCMP, and then negotiate and pay a one-time fee to the City, based on the net increase and associated size of upgrade needed for the entire HQCMP.</td>
<td>Prior to on-campus development that would result in a net increase in stormwater/waste water.</td>
<td>Prior to on-campus development that would result in a net increase in stormwater/waste water.</td>
<td>SMUD; City of Sacramento’s Department of Utilities</td>
<td>SMUD; City of Sacramento’s Department of Utilities</td>
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<td>Cumulative</td>
<td>Would the project, in conjunction with other reasonably foreseeable projects in the area, result in intersection level of service impacts?</td>
<td>Mitigation Measure 4-1: Fair share contribution towards improvement of intersection of 65th Street and US 50 Eastbound Ramp. Prior to construction of facilities that would increase on-site employment, SMUD shall provide a fair share contribution (based on SMUD’s contribution to total cumulative peak hour traffic) to the City of Sacramento for the provision of a northbound right turn pocket at the intersection of 65th Street and US 50 Eastbound Ramps.</td>
<td>Prior to construction of facilities that would increase on-site employment.</td>
<td>Prior to construction of facilities that would increase on-site employment.</td>
<td>SMUD</td>
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5 References


SMUD. See Sacramento Municipal Utility District.
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