Sacramento Municipal Utility District
Headquarters Building
and Site Rehabilitation 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: Rob Ferrera, Environmental Specialist
(916) 732-6676 or rob.ferrera@smud.org

SCH# 2015012028
Introduction

This final initial study (IS) and mitigated negative declaration (MND) have been prepared to evaluate the Sacramento Municipal Utility District’s (SMUD) proposed project for compliance under the California Environmental Quality Act (CEQA). SMUD is the lead agency responsible for complying with the provisions of CEQA. SMUD proposes the Sacramento Municipal Utility District Headquarters Building and Site Rehabilitation Project (also referred to as “the proposed project”).

Project Description

SMUD proposes to undertake a rehabilitation of its Headquarters Building and a 13.66-acre portion of the headquarters site located at 6201 S Street in Sacramento, California. The Headquarters Building and site have served as SMUD’s district headquarters since construction was completed in 1960. The Headquarters Building was listed in the National Register of Historic Places in 2010 as an excellent example of Modern International Style design. SMUD considers the Headquarters Building and site to be a necessary facility to meet current and future business needs and provide a more functional facility, and as significant to its brand and image. Therefore, SMUD desires to rehabilitate the Headquarters Building and a 13.66-acre portion of the headquarters site to support continued use for the foreseeable future. A more detailed description of the project can be found in Chapter 2.

Findings

As the CEQA lead agency, SMUD finds that the proposed project would be implemented without causing a significant adverse impact to the environment. Mitigation measures would be implemented to reduce potentially significant impacts to a less-than-significant level.

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 incrementally to considerable environmental changes when considered in combination with existing operations and other forecasted projects in the area. Therefore, the potential environmental effects of the proposed project were determined to be less than significant. All identified potentially significant impacts would be mitigated to a less-than-significant level.

Other projects currently proposed in the vicinity of the project site were determined in coordination with the City of Sacramento. The reasonably foreseeable projects included in the MND’s cumulative context were limited to those that were in process by the City of Sacramento when the notice of availability was released on January 15, 2015. Based on this methodology, one other project is currently proposed in the vicinity of the SMUD Headquarters Building and Site Rehabilitation Project. This project proposes a new development at 1817 65th Street, across from the SMUD campus and adjacent to the 65th Street light rail station. The project site is bounded by 65th Street to the west, the light rail tracks and Q Street to the north, Redding Avenue to the east, and U.S. Highway 50 (U.S. 50) to the south. The project would involve construction of one or two new four-story hotels.
and approximately 10,000 square feet of retail space on 5.67 acres. A 117-room Hampton Inn and Suites would be built on the east end of the site, and either a second hotel or an office building would be built on the west side of the site. The retail space would be a separate, third building fronting 65th Street. In addition to the proposed structures, the development would include tree removal, new fencing, new signs, plantings along U.S. 50 and near the 65th Street light rail station, installation of a 48-inch water main, transit area improvements, widening of the off-ramp at 65th Street, a tie-in to the Redding Street combined-sewer line, new transformers for existing power lines, and construction of 124 new parking spaces on the project site. The project is currently under review with the City of Sacramento, but a CEQA document has not been released to date.

Growth-Inducing Impacts

The proposed project is the rehabilitation of an existing building and the surrounding property. It would not implicate the provision of any service or planning effort that could affect future growth.

Determination

On the basis of this evaluation, SMUD concludes:

- 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.

- The proposed project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.

- The proposed project would not have impacts that are individually limited, but cumulatively considerable.

- The proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

- 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. Pending public review and SMUD Board of Directors approval, this MND will be filed pursuant to State CEQA Guidelines Section 15075.

Signature
Rob Ferrera  
Environmental Specialist
# TABLE OF CONTENTS

## 1.0 INTRODUCTION .......................................................................................................... 5
1.1 Review of the Draft IS/MND ............................................................................. 5
1.2 Preparation of the Final IS/MND ...................................................................... 5
1.3 State CEQA Guidelines ................................................................................... 5
1.4 Analysis ............................................................................................................ 6

## 2.0 COMMENTS AND RESPONSES ................................................................................ 7
2.1 Letter 1, Trevor Cleak, Central Valley Regional Water Quality
Control Board (Central Valley RWQCB), February 6, 2015 .................... 8
Comment Letter 1—Trevor Cleak, Central Valley RWQCB ..................... 13
Comment Letter 2—Eric Fredericks, Caltrans .......................................... 13
2.1.1 Comment 1-1—List of Permits Related to Water Quality .................. 13
2.1.2 Response 1-1 .................................................................................. 13
2.2 Letter 2, Eric Fredericks, Caltrans, February 13, 2015 ......................... 14
2.2.1 Comment 2-1 .................................................................................. 16
2.2.2 Response 2-1 .................................................................................. 16
2.2.3 Comment 2-2 .................................................................................. 16
2.2.4 Response 2-2 .................................................................................. 16
2.2.5 Comment 2-3 .................................................................................. 16
2.2.6 Response 2-3 .................................................................................. 16
2.3 Letter 3, Adelita Espinoza, Tahoe Park Association (TPA),
February 17, 2015 ......................................................................................... 17
Comment Letter 3—Adelita Espinoza, TPA ............................................. 28
2.3.1 Comment 3-1—Traffic .................................................................... 28
2.3.2 Response 3-1 .................................................................................. 28
2.3.3 Comment 3-2—Trees .................................................................... 30
2.3.4 Response 3-2 .................................................................................. 30
2.3.5 Comment 3-3—Traffic .................................................................... 31
2.3.6 Response 3-3 .................................................................................. 31
2.3.7 Comment 3-4—Employee Relocation ............................................ 31
2.3.8 Response 3-4 .................................................................................. 31
2.3.9 Comment 3-5—Pedestrian Access ................................................ 32
2.3.10 Response 3-5 ................................................................................ 32
2.3.11 Comment 3-6—Schools ................................................................. 33
2.3.12 Response 3-6 ................................................................................ 33
2.3.13 Comment 3-7—Addition of Cars ................................................ 33
2.3.14 Response 3-7 ................................................................................ 33
2.3.15 Comment 3-8—Hotels ................................................................... 33
2.3.16  Response 3-8 ........................................................................................................ 33
2.3.17  Comment 3-9—Regional Traffic Related to Temporary
        Relocation of Employees .................................................................................. 33
2.3.18  Response 3-9 .................................................................................................... 33
2.3.19  Comment 3-10—Requests .................................................................................. 34
2.3.20  Response 3-10 .................................................................................................... 34
2.4    References ......................................................................................................... 34

Appendices

Appendix A    Mitigation Monitoring and Reporting Program (MMRP)
Appendix B    Sacramento Municipal Utility District Headquarters Building and Site
              Rehabilitation Project Final Initial Study and Mitigated Negative
              Declaration (with Text Edits)
              (on CD)
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; Sacramento County; 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 15, 2015, and ended on February 16, 2015. SMUD held a public meeting on January 27, 2015, and held seven additional meetings with interested community groups and neighborhood associations. Three 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 edits have been made to the text of the IS/MND. One change refers to the potential need for a transportation permit from the California Department of Transportation (Caltrans) for the movement of oversized or excessive loads on state highways. It has been added to Section 2.6.2 as a permit potentially required for the project. Some additional information has been added to Section 2.2.5, "Relocation of SMUD Employees," of the IS/MND for clarification purposes and very minor edits have been made in other sections for clarification only. All text changes are shown in track changes 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).

These minor 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 State CEQA Guidelines Section 15073.5.

1.3 State CEQA Guidelines

State CEQA Guidelines Section 15073.5 provides for recirculation of a negative declaration prior to adoption. Section 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 Section 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.

Staff has determined that none of the aforementioned conditions requiring recirculation 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

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.” (Section 15073.5[c])

1.4 Analysis

The Final IS/MND does not include changes to the proposed project description, just minor edits for clarification. 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 State CEQA Guidelines Section 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 Section 15073.5(b).

None of the provisions of Section 15073.5 apply to the proposed changes; therefore, recirculation of the Draft IS/MND is not required. The changes to the “Relocation of SMUD Employees” section were made for clarification purposes only and are not considered “substantial revisions.” They would not result in new, avoidable significant effects, and new mitigation measures or project revisions are not required to reduce any new effect to less than significant. Therefore, none of the situations described in State CEQA Guidelines Section 15073.5 apply and the 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>Trevor Cleak</td>
<td>1</td>
<td>1-1</td>
</tr>
<tr>
<td>Central Valley Regional Water Quality Control Board</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2/6/15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eric Fredericks</td>
<td>2</td>
<td>2-1 through 2-3</td>
</tr>
<tr>
<td>Caltrans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2/13/15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adelita Espinoza</td>
<td>3</td>
<td>3-1 through 3-9</td>
</tr>
<tr>
<td>Tahoe Park Association</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2/17/15</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2.1 Letter 1, Trevor Cleak, Central Valley Regional Water Quality Control Board (Central Valley RWQCB), February 6, 2015
Central Valley Regional Water Quality Control Board

6 February 2015

Rob Ferrera
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

CERTIFIED MAIL
7014 2120 0001 3978 0742

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, SMUD HEADQUARTERS BUILDING AND SITE REHABILITATION PROJECT, SCH# 2015012028, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse’s 15 January 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Mitigated Negative Declaration for the SMUD Headquarters Building and Site Rehabilitation 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:

KARL E. LINDSEY, P.E., CHAIR | PAMELA C. CHESTIN, P.E., BCCEE, EXECUTIVE OFFICE
15220 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley
Phase I and II Municipal Separate Storm Sewer System (MS4) Permit

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.
Clean Water Act Section 401 Permit – Water Quality Certification
If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of
Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any
other federal permit (e.g., Section 9 from the United States Coast Guard), 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 USACOE 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:

Regulatory Compliance for Commercially Irrigated Agriculture
If the property will be used for commercial irrigated agricultural, the discharger will be required
to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. Obtain Coverage Under a Coalition Group. Join the local Coalition Group that
   supports land owners with the implementation of the Irrigated Lands Regulatory
   Program. The Coalition Group conducts water quality monitoring and reporting to the
   Central Valley Water Board on behalf of its growers. The Coalition Groups charge an
   annual membership fee, which varies by Coalition Group. To find the Coalition Group in
   your area, visit the Central Valley Water Board’s website at:
   http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/
   index.shtml or contact water board staff at (916) 464-4611 or via email at
   IrrLands@waterboards.ca.gov.

2. Obtain Coverage under the General Waste Discharge Requirements for Individual
   Growers, General Order R5-2013-0100. Dischargers not participating in a third-party
group (Coalition) are regulated individually. Depending on the specific site conditions,
growers may be required to monitor runoff from their property, install monitoring wells,
and submit a notice of intent, farm plan, and other action plans regarding their actions to
comply with their General Order. Yearly costs would include State administrative fees
(for example, annual fees for farm sizes from 10-100 acres are currently $1,084 +
$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring
costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory
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:

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

If you have questions regarding these comments, please contact me at (916) 464-4684 or tcleak@waterboards.ca.gov.

Trevor Cleak
Environmental Scientist

cc: State Clearinghouse unit, Governor’s Office of Planning and Research, Sacramento
Comment Letter 1—Trevor Cleak, Central Valley RWQCB

Comment Letter 2—Eric Fredericks, Caltrans

2.1.1 Comment 1-1—List of Permits Related to Water Quality

The commenter provides a list of the permits related to water quality that his agency gets involved with and provides links to additional information related to each permit. Permits discussed include the following:

- Construction Stormwater General Permit
- Phase I and II Municipal Storm Sewer System (MS4) permits
- Industrial Storm Water General Permit
- Clean Water Act Section 404 permit
- Clean Water Act Section 401 permit—water quality certification
- Waste discharge requirements
- Regulatory compliance for commercially irrigated agriculture
- Low or Limited Threat General National Pollutant Discharge Elimination System Permit

2.1.2 Response 1-1

SMUD thanks the Central Valley RWQCB for its review of the proposed project. SMUD will obtain all necessary permits related to water quality, as discussed in Section 3.9, “Hydrology and Water Quality,” of the IS/MND. SMUD anticipates the need for a Construction Stormwater General Permit, as discussed in Mitigation Measure HYDRO-1. Mitigation Measure HYDRO-2 states that if dewatering was required, SMUD would also obtain the necessary permit, either under a General Dewatering Permit or under a project-specific dewatering discharge permit. Based on the project description, SMUD does not anticipate the need for the other permits.
2.2 Letter 2, Eric Fredericks, Caltrans, February 13, 2015

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 - MB 19
SACRAMENTO, CA 95833
PHONE: (916) 274-0635
FAX: (916) 263-1766
TTY: 711

February 13, 2015

Mr. Rob Ferrera
Sacramento Municipal Utilities District (SMUD)
6201 S Street
Sacramento, CA 95817

SMUD Headquarters Building and Site Rehabilitation Project – Mitigated Negative Declaration (MND)

Dear Mr. Ferrera:

Thank you for including the California Department of Transportation (Caltrans) in the MND environmental review process for the project referenced above. The proposed project consists of rehabilitating the SMUD Headquarters Building (HQ) and site, and establishing two separate trailer locations on SMUD’s campus. The project is located at 6201 S Street, north of US Highway 50 (US 50) at the 65th Street / US 50 interchange. The following comments are based on the MND.

Transportation Management Plan (TMP)

On page 164 of the MND, the Transportation and Circulation Section indicates that the project will cause inadequate emergency access without mitigation, because S Street could be affected intermittently during construction of proposed improvements to the 15-inch storm drain pipeline located within the S Street right-of-way (ROW). Mitigation Measure (MM) TRA-1 is MM HAZ 3. Prepare and Implement a Traffic Control Plan, which states, “SMUD and/or its construction contractors shall prepare and implement a traffic control plan for construction activities that may affect road rights-of-way, to facilitate travel of emergency vehicles on affected roadways. The traffic control plan shall follow applicable City of Sacramento standards and shall be approved and signed by a professional engineer. Measures typically used in traffic control plans include advertising of planned lane closures, warning signage, a flag person to direct traffic flows when needed, and methods to ensure continued access to the existing surrounding land uses shall be maintained at all times, with detours used as necessary during road closures. The traffic control plan shall be submitted to the City of Sacramento Public Works department for review and approval before the approval of improvement plans.”

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."
Mr. Rob Ferrera / SMUD
February 13, 2015
Page 2

Due to the proximity of the HQ building, on S Street, to the westbound US 50 onramp at 65th Street, the Traffic Control Plan or TMP should also be circulated in draft to the Caltrans District 3 Traffic Manager, Bob McNew, Caltrans, District 3, Regional Traffic Management Center, 3165 Gold Valley Drive, Rancho Cordova, CA 95742. The TMP should be prepared in accordance with Caltrans' Manual on Uniform Traffic Control Devices. Further information is available for download at the following web address: http://www.dot.ca.gov/hq/traffops/engineering/mutcd/ca_mutcd2014.htm.

**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, HQ, 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 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 Sergio Aceves, Caltrans, 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 at the following URL 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, Intergovernmental Review Coordinator at (916) 274-0616 or by email at: arthur.murray@dot.ca.gov.

Sincerely,

ERIC FREDERICKS, Chief
Office of Transportation Planning – South

e: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."
2.2.1 Comment 2-1

The commenter asks for Caltrans to be included in the review of the traffic control plan (TCP) that will be prepared for the project under Mitigation Measure TRA-1, which is also Mitigation Measure HAZ-1. Caltrans would like to be included in the review because of the proximity of the project site to the westbound U.S. 50 on-ramp. The commenter also states that the TMP should be prepared in accordance with Caltrans’s Manual on Uniform Traffic Control Devices (MUTCD).

2.2.2 Response 2-1

The MND addresses the need for a TCP under Mitigation Measure TRA-1. The TCP will be prepared to industry standards such as those outlined in the MUTCD and will be circulated to Caltrans for review.

2.2.3 Comment 2-2

The commenter states that project work that requires movements of oversized or excessive load vehicles on state highways requires a transportation permit from Caltrans. Information on how to prepare and submit a permit application is also provided.

2.2.4 Response 2-2

SMUD does not anticipate the need for an excessive-load permit. If the need for an oversized- or excessive-load permit is determined, SMUD’s construction contractor would obtain the appropriate permit, as needed. This permit has been added to the list or potential permits needed for the project in Section 2.6.2.

2.2.5 Comment 2-3

The commenter states that any work or traffic control that would encroach onto the State right-of-way of U.S. 50 would require and encroachment permit from Caltrans. Information on how to prepare and submit a permit application is also provided.

2.2.6 Response 2-3

SMUD does not anticipate the need for encroachment into the right-of-way of U.S. 50. Therefore, the encroachment permit would not be needed for the project, and it was not discussed in the IS/MND.
2.3 Letter 3, Adelita Espinoza, Tahoe Park Association (TPA), February 17, 2015

TPA
February 17, 2015 tpacomm@gmail.com

SMUD Negative Declaration

There are several issues that TPA has identified with the negative declaration report for SMUD. SMUD’s negative declaration is citing that the proposed development would have no effect on the environment. However, what SMUD is failing to take into account in their negative declaration is cumulative effect amongst other CEQA emissions and non-disclosures of the following:

- The lot located at the west side of 59th Street has ongoing issues currently with limited outlet access causing congestion.
- The area is currently impacted with traffic and the accident injury report confirms the issues with impacted traffic.
- It does not discuss efficiently or analyze additional impacts the traffic increase will have to surrounding neighborhoods, schools, bikes/pedestrians that use
- 59th St. to/from facilities which are currently impacted without the 498 people at SMUD HQ and temp units. ANY increase to an impacted condition MUST be considered significant according to CEQA.
- Nor does it disclose any mitigation to reduce or mitigate those impacts their project will have possible to make 59th street and the 59th street Bridge safer for children, seniors and
- the disabled crossing. Pedestrian access is currently blocked without the addition of the 498 people at SMUD HQ and temp units and they made no mention of improving conditions they will be impacting on the bridge. With the addition this will make the situation more dire. ADA Wheelchair access is not standard on the bridge the width of the sidewalk is not wide enough on the bridge.
- SMUD did not disclose the removal of mature trees heritage trees at the 59th street site whose athletic value is intrinsic to keeping the community canopy.
- Currently they have been cutting down mature trees of historical value and not replacing them with trees of equal maturity and canopy on 59th street. Their is no mention of disclosure of this in their negative declaration for 59th Street.
- They did not disclose how they would mitigate traffic in their revised pattern to keep traffic from entering adjacent neighborhoods on 59th Street which is currently impacted. 250 more cars potentially would be coming from their parking lot. It was detailed in their ND that 250 parking spaces would be made available.
- They did not disclose in what way they were in conflict with the general plan i.e. adopted policies for bikes and pedestrians that would otherwise decrease the performance of such facilities.
- The city General plan clearly states making streets multi-modal streets for pedestrians and bike. They are in conflict with the general plan. There are no plans for the surface streets of
S st. where people commute to increase on street bike path usage or pedestrian usage. S st. lacks pedestrian sidewalks and is in violation of ADA. There is no structural enforcement of the speed limit.

- They did not disclose the circulation pattern which they would be using for exits to and from their parking lots and how that would affect 59th street which is impacted.

**PROBLEMS IN DEPTH:**

1. The possible permanent increase of 498 cars on the west side of 59th will increase current impacted levels of 59th street.

"2.5.5 Relocation of SMUD Employees
The Headquarters Building would be completely vacated before rehabilitation activities. Employees currently located in the Headquarters Building would be relocated on a temporary or permanent basis. Relocation sites include the following SMUD facilities:

- Field Reporting Facility
- Customer Service Center
- Corporate Yard at 59th Street
- Field Reporting Facility temporary trailer location
- 59th Street temporary trailer location
- East Campus Operations Center (EC-OC)" — SMUD

The breakdown of staff is as follows: SMUD

- 93 employees from the Headquarters Building to the Customer Service Center
- 75 employees from the Headquarters Building to the Field Reporting Facility
- 109 employees from the Headquarters Building to Field Reporting Facility temporary trailers
- 91 employees from the Headquarters Building to the existing 59th Street Corporate Yard buildings 35 employees from the Headquarters Building to 59th Street temporary trailers
- 95 employees from the Customer Service Center to the existing 59th Street Corporate Yard building" — SMUD

Currently there are already 100 employees at an impacted area on the west side of 59th street. 498 return total to all facilities will only increase the total currently there now. The people at the temporary buildings are possibly being there permanently and will therefore effect traffic on 59th during the buildout and after the buildout at HQ. "2.5.5 Relocation of SMUD Employees Employees currently located in the Headquarters Building would be relocated on a temporary or
TPA
February 17, 2015 tpacomm@gmail.com

permanent basis." SMUD

2. Parking Problem:
   "Site rehabilitation would add up to 250 employee spaces." – SMUD This potential increase would encourage more cars on impacted streets.

   The lack of accounting for CEQA mandates: ANY increase to an impacted condition MUST be considered significant. There is no disclosure what the circulation pattern would be so as to not affect 59th street which is a 2 lane neighborhood adjacent street.

   • CEQA (Section15355) "The cumulative impacts from several projects are the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects"

   There are no references made regarding how these increases to parking will be prevent those increase of cars wether incremental and what their impact would be to the neighborhood. Also it was not disclosed wether the increased plan of 250 car per spaces would be prevented from entering neighborhoods and impacting neighborhood streets. No mitigation was found in the document however mitigation IS required according to CEQA law CEQA (Section15355).
3. Pedestrian Problem:

"Pedestrian Access"

Pedestrian facilities such as sidewalks, crosswalks, and curb ramps are somewhat limited near the project site. Sidewalks are occasionally discontinuous, such as along Folsom Boulevard and along the south side of S Street between 59th Street and 65th Street. At some intersections, particularly at ramp terminals such as S Street/59th Street and S Street/65th Street, crossings may not be accommodated on all legs, while at some curb cuts serving off-street parking facilities, marked crosswalks may not be provided across the driveway. Curb ramps are generally provided at all locations with marked crosswalks, although some locations lack tactile warning devices and therefore are not fully compliant with current Americans with Disabilities Act (ADA) regulations.

In general, however, a clear, relatively direct path of travel is available from both the 59th Street Station and the University/65th Street Station (and the adjacent transit center) to the project site.

Again CEQA law (Section 15356) and section 15065(c) "The cumulative impacts from several projects are the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects" is in effect and must be obeyed. Currently the site must be improved there are multiple large traffic generators that share the same block as SMUD on the on/off ramp at 59th and S street yet no crosswalks or sidewalks. Improvement to older structures need to be done to ensure safety and access for all. Residents should not have to suffer from increased negative traffic conditions in impacted areas. Ratio tests are rejected outrightly and justifiably so when past, current and future developments are considered for the area.
There are no side walks no crosswalks to major shopping centers ie traffic generators on, on/off ramps. There are no bike lanes on bridge yet the space is available for one to connect to traffic generators. Children commute to school here daily. Light rail stop is here too. HIGH pedestrian zone. These generators serve over 3 neighborhoods.

Pedestrian scale light the length of 59th street in keeping with the area's historical aesthetic in material color and type of shade is required by CEQA. Increased undisclosed foot traffic by SMUD will require lighting in keeping with current historical lighting aesthetic for the neighborhood. Lighting that will not take away from the historical lights in place both Tahoe Park and East Sacramento residential streets thereby impacting the areas historical value.
TPA
February 17, 2015
tpacommm@gmail.com

4. **SCHOOLS IMPACTED**: "Schools No Impact. The proposed project would not provide any new housing that would generate new students in the community. Therefore, the proposed project would have no impact on school services and facilities." —SMUD

This is insufficient analysis and disclosure of schools routes impacted. There are over 4 schools in the area with children that commute on Folsom Blvd. and on 50th street everyday. Children are also attracted to stores in the area located on the map directly in the path of SMUD potential new growth in traffic. Here this document only refers to "generating new students in the community."

- Current conditions MUST be taken into account according to CEQA regarding **Section 15355** of the State CEQA Guidelines defines “cumulative impacts” as two or more individual effects that, when considered together, are either considerable or compound other environmental impacts. State CEQA Guidelines (14 CCR 15130) require a reasonable analysis of the significant cumulative impacts of a Proposed Project. Cumulative impacts are defined by CEQA as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (State CEQA Section 15355).
  Cumulative impacts are further described as follows: The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impacts from several projects are the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines, Section 15355[b])."
• The fact that ANY addition of cars to an already impacted situation must be mitigated to the fullest extent feasible according to CEQA.

• They also included in their negative declaration the building of 2 hotels off of 65th in the area. This according to CEQA / SMUD would be in violation of Section 15130 therefore SMUD must complete an EIR. While their build-out will be incremental there are other possible buildings that could compound issues ie traffic in future from these hotels hence CEQA law is automatically in acted. via the sections below.

(CEQA) Guidelines requires that:
Environmental Impact Report (EIR) discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable, as defined in section 15065(c). Section 15355 of the State CEQA Guidelines defines “cumulative impacts” as two or more individual effects that, when considered together, are either considerable or compound other environmental impacts.

State CEQA Guidelines (14 CCR 15130) require a reasonable analysis of the significant cumulative impacts of a Proposed Project. Cumulative impacts are defined by CEQA as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (State CEQA, Section 15355). Cumulative impacts are further described as follows: the individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impacts from several projects are the changes in the environment which result from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects.

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines, Section 15355(b)).

Furthermore, according to State CEQA Guidelines Section 15130(a)(1):
As defined in Section 15355, a “cumulative impact” consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.
TPA
February 17, 2015
tpacomm@gmail.com

The permanent move of 400 additional people though incremental adding to the 100 people already at SMUD near west 60th St. will affect 59th S St. access more than currently hence in violation of CEQA. According to their negative declaration they are proposing to use a 2 lane road with only these 2 outlets with increased regularity. These totals do not include the future amount coming from the build-out and 65th street traffic using S st. to go west as a short cut to facilities from hotels that are planned as well. The increase of traffic, the potential for more infill in future, traffic on 59th will increase and travel into Tahoe Park and other neighborhoods. While TPA understands the building on 65th as it is a big expressway it still does not mitigate against traffic coming into S st. or onto Folsom Blvd. from 59th which bottle necks.

- The danger on 59th St. is well documented and according to the accident injury report dating from 2003-2012. According to CEQA any contribution to and already impacted situation must be considered significant.

Because of all of these reasons TPA views the project in conflict with CEQA under the following Section 15130, section 15065 (c), Section 15355, State CEQA Guidelines (14 CCR 15130, 15355(b)), Section 15130(a)(1), As defined in Section 15355, SMUD must complete an EIR.
TPA in turn is making the following requests if fulfilled will see traffic as mitigated to the fullest extent possible under CEQA and no further action is needed:

- A MUST ADA access and a crosswalk also be put at the South Western side & South Eastern of the on/off ramp nearest Tahoe Park. Another at the Northwest end of the Bridge.

- A MUST Protected bike lanes on Bridge with buffer need to be installed on the bridge leading into Tahoe Park. A dropped turn lane will be needed. TPA can help with creating approved residential friendly buffers.

- A MUST Pedestrian lights on bridge in keeping with both neighborhoods historic lamps in color, material and acorn shade. Both East Sacramento and Tahoe Park's neighborhood posts are light green steel or light green cast iron. All glass shades are acorn shaped. Warm LED's to fight light blight on neighboring homes or non-LED bulb. TPA suggestion is Dark Sky acorn shades.

- A MUST Mitigation on S st. from 65th to slow traffic and make unattractive to cut through traffic from 65th.

- At the intersection of S st. 59th a wide high visibility pedestrian median should be installed with a tree or other like foliage through the crosswalk.

- A MUST Parking lot facing S St. limited entrance only no exit to 59th street from West side employee parking lot. Main Exits to be placed at the 65th St expressway leading directly to 2 on off freeway ramps to keep traffic off of impacted neighborhood street connectors and on freeways and larger 4 lane expressway.

- A MUST In addition TPA would also like to request a high visibility bulb-out be put in on 59th/T on the north west side with the southern end being the largest creating a green parklet on entry to the neighborhood most of the property is already present a bulb-out is all that is required to narrow entry to Tahoe Park. TPA can work with SMUD on the enhancement and removing existing encumbrances.

- A MUST Signal at 59th/T intersection MUST be removed in place of Traffic circle with high visibility foliage and a 4 way stop sign which is more effective than current signals for
pedestrians and bikes.

- At the intersection of 59th and Tst. on the entry to Tahoe Park a wide high visibility foliage oriented pedestrian median to be put in the cross walk with a tree or like foliage.

- A MUST nice neighborhood sign to be put in the median or traffic circle to let drivers know they are entering a neighborhood. TPA can help with sign design in keeping with a residential neighborhood and historic value.

- A MUST Also due to the increased traffic of a potential 498+ additional cars on 59th, a road diet should be put into place to allow for curb extensions to be installed on the Westside 59th Street and Eastside of 59th Street into Tahoe Park to Broadway where children are crossing and communting.

- High visibility foliage oriented Traffic Circles to be installed on 2nd ave and on Tahoe Way. Children are reported to have been injured on these intersections due to traffic. The possibility of 250 more cars traveling down out roads everyday WILL impact Tahoe Park.

- Protected bike lanes from bridge leading into Tahoe Park on 59th down to the Broadway intersection. Children are commuting to and from school in Tahoe Park on 59th Street to at least 4 different schools and 59th St. dead ends at yet another Elementary school on Broadway.

- If pedestrian scale acorn style lights are not already in place put in pedestrian lights keeping with the material color i.e. historical aesthetic of the residential streets they should be put in place from 59th and T to 59th and Broadway. MUST be acorn style light green and same historic materials currently on the majority of the residential streets in Tahoe Park proper and in curb extenders.

- Intersection of 59th St. and Broadway. MUST BE NON-LED lights which can be dimmed or LED warm lights which can be dimmed whichever is warmer and more energy efficient.

- A MUST, Greenbelt curb extenders with multi-modal pedestrian and bike from the 59th Street intersection at Tst. to 59th and Broadway to 59th Street and Broadway intersection.

- to prevent collisions from increased vehicles and provide structural support of the speed limit of the already impacted area. A MUST Larger mature fast growing trees in keeping with the
TPA
February 17, 2015
tpacomm@gmail.com

- A corridor of larger older trees that are fast growing on 59th /St. to Folsom Blvd. within green curb extenders on the East and West side of 59th.
- A continuation of protected bike lanes i.e. multimodal bike/foot path in keeping with historical aesthetic from both Tahoe Park and East Sacramento from Broadway and 59th St. into East Sacramento on 59th/ Folsom Blvd connecting entrances of schools on the access street of Folsom Blvd. Raise all curbs to vertical no rounded curbs.
- Pedestrian style lamps from Bridge to 59th/ Folsom Blvd. in keeping with East Sacramento historic lamp, color, material and glass shade. TPA Suggestion a Dark Sky Acorn lamp shade using only warm LED or regular NON-LED to fight light blight to adjoining residences. whichever is warmer and more energy efficient.
- Intersection at 59th and Folsom raise all curbs to vertical green belts if not already in place /w multimodal bike and pedestrian path.
Comment Letter 3—Adelita Espinoza, TPA

Several comments in this letter describe ongoing issues related to traffic congestion and public safety in the Tahoe Park neighborhood and vicinity of the SMUD campus. The comments ask SMUD to implement measures to improve these ongoing issues. The IS/MND analyzes the impacts resulting from the specific SMUD Headquarters Building and Site Rehabilitation Project on the environment. Where potentially significant impacts are identified, as based on specific impact thresholds provided in Appendix G of the State CEQA guidelines, mitigation measures to mitigate these project-specific impacts to a less-than-significant level are identified, as required by CEQA. The project does not include mitigation for ongoing issues not related to the project or for unrelated but reasonably foreseeable projects, such as the hotel project on 65th Street. Because the SMUD Headquarters and Site Rehabilitation Project mitigates all impacts to a less-than-significant level, no additional mitigation beyond what is proposed in the IS/MND is required. Project planning and permitting is conducted by SMUD in close coordination with the City of Sacramento.

2.3.1 Comment 3-1—Traffic

The commenter states that SMUD fails to take into account several issues related to existing traffic, circulation, and safety concerns in the project area that should be considered in the “cumulative impact” analysis:

- Congestion issues at the outlet of the 59th Street lot
- General traffic and injury issues in the area
- Impacts of project traffic on surrounding neighborhoods, schools, bikes/pedestrians, etc.
- Existing traffic to/from 59th Street
- Safety issues on 59th Street bridge
- Americans with Disabilities Act (ADA) issues at the 59th Street bridge

2.3.2 Response 3-1

Although the commenter refers to “cumulative effects,” the comments reflect a concern that the IS/MND does not appropriately address existing conditions and problems in the vicinity of the project site relating to traffic and circulation, and the project’s impact on these conditions. As discussed in Section 3.16, “Transportation and Circulation,” of the IS/MND, the proposed project was found to have less-than-significant impacts, or to have no impact, with regard to the specific questions from Appendix G of the State CEQA Guidelines related to traffic or transportation, with the exception of potential effects on emergency access during potential improvements to pipe infrastructure in S Street.

As referenced from the draft environmental impact report (EIR) for the California State University, Sacramento (CSU) Campus Master Plan 2015 (CSU 2015), major intersections in the project area generally operate at acceptable conditions during the weekday a.m. and p.m. peak hours, defined as Level of Service (LOS) D or better. In particular, intersections along 65th Street and Folsom Boulevard, both of which serve as key access routes to and from the project site, currently operate at LOS D or better during both peak hours (CSU 2015).
As discussed in the IS/MND, the project would represent a renovation and rehabilitation of existing on-site uses and would not increase the amount of traffic generated at the site. Although access routes within the site may change slightly after completion of the project, the project would not fundamentally change vehicular access to and from the site. Construction-related activities may result in a slight increase in traffic to and from the site, but the increased traffic levels would be temporary and would be spread throughout the day, thus minimizing the effect during the peak hours. Thus, general traffic operations surrounding the project site are not expected to change as a result of the project.

The IS/MND acknowledges that there may be a slight increase in traffic to and from the site as a result of construction-related activities, but these effects would be temporary, and would occur throughout the day, as opposed to during the a.m. and p.m. peak hours. Furthermore, these trips would be partially offset by a reduced number of trips. Specifically, project implementation would result in the permanent reassignment of 65 current headquarters employees to the East Campus-Operations Center (EC-OC), 5 miles to the east on Bradshaw Road, and the relocation would reduce trips to the headquarters site by current employees (as discussed in Section 2.5.5, “Relocation of SMUD Employees”).

Furthermore, once construction is complete, entrances, gates, and internal roadways at the headquarters site would be modified to provide improved traffic circulation within the site and to reduce congestion on public streets caused by queuing at entrances. Specifically, the gates off of S Street would be moved north and the access to the west parking lot would be relocated to the north once construction is complete. During construction, employees would have access to the site from S Street, except for temporary closures. The gates would not be closed off for the duration of construction. As discussed in the IS/MND in Impact e) of Section 3.16, “Transportation and Circulation,” and Section 3.8, “Hazards and Hazardous Materials,” traffic on S Street could be affected intermittently during construction of proposed improvements to the 15-inch storm drain pipeline or connections to the 12-inch water line located within the S Street right-of-way, if these upgrades are required. Because construction activities related to S Street pipe improvements could result in temporary lane closures, increased truck traffic, and other roadway effects that could interfere with or slow down emergency vehicles, temporarily increasing response times and impeding existing services, this impact was found to be potentially significant. The IS/MND includes Mitigation Measure TRA-1, which calls for implementation of Hazards and Hazardous Materials Mitigation Measure HAZ-3. Mitigation Measure HAZ-3 calls for the preparation and implementation of a construction traffic control plan.

The commenter expresses specific concern regarding ongoing congestion issues on 59th Street. As discussed in Section 2.5.5, “Relocation of SMUD Employees,” approximately 200 employees would be temporarily relocated to the 59th Street Corporation Yard Building, and approximately 35 employees would report to the 59th Street temporary trailer location. The Corporation Yard has approximately 675 parking spots available, and thus, has ample space to accommodate the parking needs of these temporary relocated employees. Therefore, the relocation of these employees is not expected to worsen parking or congestion on 59th Street.
The commenter’s references to existing pedestrian traffic issues on the 59th Street bridge are not related to the project. The project will have no effect on the current level of pedestrian traffic on the bridge.

Based on the analysis in the IS/MND and the overall trip estimates for the area, the impacts related to local traffic flow were found to be less than significant and no further traffic-related mitigation beyond Mitigation Measure TRA-1 is required.

### 2.3.3 Comment 3-2—Trees

The commenter states that SMUD did not disclose the removal of mature Heritage Trees at the 59th Street site and that tree removal at this site was ongoing.

### 2.3.4 Response 3-2

The impact of potential Heritage Tree removal and mitigation is addressed in the IS/MND in Section 3.4, “Biological Resources,” under Impact e). SMUD conducted a full inventory of all trees and shrubs (landscape inventory) in the project area, including the temporary trailer sites at the Field Reporting Facility and the 59th Street site, and used the detailed data from this inventory to determine impacts on protected trees resulting from the project.

The project site contains 453 ornamental trees and shrubs, and 38 of these trees meet the size criteria for Heritage Trees as defined in the City of Sacramento’s tree ordinance. The IS/MND acknowledges that construction of the project could result in the removal of some of the potential Heritage Trees within the project site and that removal or pruning of these trees requires a permit from the city, and states that removal or pruning of Heritage Trees regulated by the City of Sacramento would be a potentially significant impact.

The IS/MND contains Mitigation Measure BIO-2, which calls for the avoidance and minimization of impacts on protected trees and states that SMUD would obtain a permit from the city for impacts on these trees and implement any mitigation required for such permits consistent with the replacement ratio required by the City’s tree ordinance. It also calls for protection of trees to be retained during construction. These measures were developed in coordination with the City of Sacramento’s Urban Forester.

In addition, the landscape at the headquarters site is an important part of the historic character of the site, as determined in the cultural landscape report (CLR) included in Appendix C of the IS/MND. The goal of the project is to provide for SMUD’s needs and bring the headquarters site up to current code, utilizing the California Historical Building Code and protecting and enhancing the historically significant landscape features and characteristics. Heritage Trees and other significant plant material as indicated in the landscape inventory are evaluated for their significance and contribution to the character of the site. Those that need to be retained to maintain the site’s character have been incorporated into the site design and would be preserved. Improvements include the removal of elements that are noncontributing or incompatible, and replacement of missing items as described in the CLR where appropriate and feasible. Site design carefully takes the presence of significant landscaping elements into consideration.
Finally, it is SMUD’s current policy to replace trees removed as part of routine landscape maintenance, to maintain the character of the site. Trees or shrubs are removed only if necessary due to their health and for the safety of employees and visitors to the headquarters site.

2.3.5 Comment 3-3—Traffic

The commenter raises additional concerns related to traffic, specifically related to the following issues:

- Potential for traffic to move from the site into adjacent neighborhoods
- Conflict with adopted plans
- Parking lot exit patterns
- Potential new impacts from the up to 250 parking spaces described in the IS/MND

2.3.6 Response 3-3

It is one of the stated project objectives to update parking, roadways, and pathways at the headquarters site to meet existing parking needs and facilitate access and circulation flow between buildings and to public transit. Parking would be reconfigured to make use of the existing space more efficiently. Parking spaces would also be provided with electric conduit to enable future charging of electric vehicles. The up to 250 parking spots at the site are meant to improve on-site circulation and convenience for employees, not to enable additional capacity. The occupancy at the headquarters site would be about the same after construction, but improved parking and circulation at the site would more efficiently accommodate employees and visitors and therefore would tend to reduce traffic flow into existing neighborhoods. Traffic flow improvements within the site would help eliminate queuing when entering and exiting the site.

As discussed in Impacts a), b), and f) of Section 3.16, “Transportation and Circulation,” of the IS/MND, the project was found to have no significant impact or conflict with local policies related to traffic and transportation. SMUD also coordinated closely with the City of Sacramento during preparation of this analysis.

2.3.7 Comment 3-4—Employee Relocation

The commenter states concern about the impacts of temporary relocation of employees during construction, their potential permanent relocation, and the impact of the additional parking spaces. Specifically, the commenter is concerned about the “permanent increase of 498 cars on the west side of 59th Street with regard to the current state of 59th Street traffic and additional trips.”

2.3.8 Response 3-4

As stated previously in Response 3-3, the purpose of the additional parking spaces at the headquarters site is to better accommodate the current number of employees, not to grow the capacity of the site.
There would be no permanent increase in the number of cars at the facility on the west side of 59th Street. As stated in Section 2.5.5, “Relocation of SMUD Employees,” the ultimate long-term building occupancy at the Headquarters Building is expected to be similar to current numbers (approximately 498 employees), and relocations within the SMUD campus would be temporary during construction. Although there would be approximately 235 more employees at the 59th Street Corporate Yard Buildings and trailer during construction, the 59th Street site has approximately 675 parking spaces available to accommodate existing and additional temporary employees, so no adverse effects on parking on the street and in adjacent neighborhoods would result. Furthermore, their relocation is not expected to significantly change traffic flow and overall parking patterns in the SMUD campus vicinity and the impact was found to be less than significant. After construction, temporarily relocated employees would report back to their assigned locations.

SMUD employees and visitors to SMUD facilities currently park wherever they can find space, and parking is not assigned on a “by facility” basis. Furthermore, vehicle turnover at the campus site throughout the day is high, as employees and visitors come and go from the campus. Thus, local parking patterns are driven more by the total number of visitors and employees on campus at any given time than by the employees’ assigned work location. Therefore, the temporary reassignment of employees to the 59th Street facilities is not expected to change overall parking and traffic patterns in the SMUD campus vicinity, as discussed in detail in the IS/MND.

2.3.9 Comment 3-5—Pedestrian Access

The commenter expresses concerns regarding existing pedestrian access issues and safety concerns in the vicinity of the Headquarters Building and regarding cumulative effects related to this topic. The commenter also provides a map of facilities of concern in the general project area.

2.3.10 Response 3-5

Please note that the paragraph cited in the comment letter is from the environmental setting section of the “Transportation and Circulation” section of the IS/MND and does not represent part of the impact discussion.

The existing traffic and pedestrian conditions are part of the baseline against which the effects of the project are to be measured. It is one of the stated objectives of the project to enhance safety, and to improve vehicular and pedestrian access to the site and circulation within the site. Therefore, the project is not expected to have a negative effect on existing pedestrian access and safety in the area—either on a project basis or cumulatively.

2.3.11 Comment 3-6—Schools

The commenter states that the impact related to schools provided in the IS/MND is insufficient and states that school routes in the area could be affected, and that students are attracted to local stores and their safety could be compromised by project-generated traffic. A map is also provided.
2.3.12  Response 3-6

The impact statement cited by the commenter is directly from Appendix G of the State CEQA Guidelines, and the impact conclusion with regard to the finding is correct. School impacts addressed in this question refer to physical impacts on the environment, but no physical impacts affecting schools would occur as a result of this project. This section is not supposed to analyze regional circulation impacts related to pedestrian safety. Those impacts are analyzed in the “Transportation and Circulation” section of the IS/MND. As stated in Response 3-5 above, off-site issues related to pedestrian safety and general pedestrian access to shopping centers and other facilities in the area are not the result of, and are not affected by, the proposed project.

2.3.13  Comment 3-7—Addition of Cars

The commenter states that “ANY addition of cars to an already impacted situation must be mitigated to the fullest extent feasible according to CEQA.”

2.3.14  Response 3-7

CEQA requires mitigation only for impacts found to be significant as measured against standards in the significance threshold of Appendix G of the State CEQA guidelines. The IS/MND did not identify such impacts of the proposed project related to the number of cars in the project area; therefore, no mitigation for the number is cars is required.

2.3.15  Comment 3-8—Hotels

The commenter states that SMUD included the building of two hotels in its negative declaration and should complete an EIR because of cumulative related traffic impacts in the future.

2.3.16  Response 3-8

The proposed hotels are discussed in the “Cumulative Impacts” section on page 1 of the IS/MND. CEQA requires that SMUD assess whether its proposed project’s incremental effects are significant when viewed in connection with the effects of other projects. The proposed hotels are the only other project currently proposed in the vicinity. While the project proponents have had preliminary discussions with the City of Sacramento, and have determined what kind of impacts are expected, a CEQA document determining the specific impacts of the project had not been released. Therefore, it is not possible at the time to determine the cumulative impacts of the hotels project. The information on the hotels is provided for informational and disclosure purposes only. The hotels are not part of the proposed project; the discussion of thresholds for CEQA analysis is based on the proposed project, not on reasonably foreseeable projects.

2.3.17  Comment 3-9—Regional Traffic Related to Temporary Relocation of Employees

The commenter expresses concern regarding a traffic and safety issue on 59th Street related to temporary employee relocation and the planned hotels in the vicinity.
2.3.18 Response 3-9

Effects of the temporary relocation of employees on local traffic were found to be less than significant, as discussed in detail in Response 3-4 above.

Based on the current project schedule, construction of the SMUD Headquarters and Site Rehabilitation Project is not expected to overlap with the construction of the hotels planned for 65th Street. Therefore, because the project is not expected to contribute to any long-term increase in traffic, no mutual impacts on traffic are expected.

2.3.19 Comment 3-10—Requests

The commenter concludes the letter with an extensive list of design-related requests for local and regional improvements related to traffic and pedestrian safety, lighting, signals, signs, bike lanes, and trees.

2.3.20 Response 3-10

The listed requests are for improvements/mitigation in the Tahoe Park neighborhood, which is on the other side of U.S. 50 from the headquarters site, and the project is not expected to have any effect on pedestrian or road traffic in Tahoe Park. SMUD strives to be a good neighbor and allows local residents access to portions of its campus. However, SMUD is not responsible for regional traffic and safety patterns beyond those linked directly to its headquarters operations. SMUD encourages TPA to work with the City of Sacramento on desired neighborhood improvements, as appropriate. Mitigation is required only where impacts are considered significant in the CEQA document. The proposed mitigation in the comment letter would not meet that CEQA standard.

2.4 References