Sacramento Municipal Utility District
Station J Bulk Transmission Substation Project

Final Environmental Impact Report • February 2025

State Clearinghouse No. 2023020549

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February 2025

Lead Agency:

Sacramento Municipal Utility District
6201 S Street, MS B203
Sacramento, CA 95817-1899
or

P.O. Box 15830
Sacramento, CA 95852-0830
Attn: Rob Ferrera
(916) 732-6676 Rob.Ferrera@smud.org

Prepared by:

AECOM
2020 L Street, Suite 300
Sacramento, CA 95811
Contact: Jeff Thomas
Jeff.Thomas@aecom.com

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B Revised Draft EIR

ACRONYMS AND OTHER ABBREVIATIONS

ASTM	American Society for Testing and Materials International
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
City	City of Sacramento
dBA	A-weighted sound levels
Draft EIR	draft environmental impact report
EIR	environmental impact report
Final EIR	final environmental impact report
kV	Kilovolt
MDO	Medium Density Overlay
MMRP	mitigation monitoring and reporting program
mph	miles per hour
MVA	megavolt-amperes
PRC	Public Resources Code
project	Station J Bulk Transmission Substation Project
SCEMD	Sacramento County Environmental Management Department
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
STC	Sound Transmission Class
STLC	Soluble threshold limit concentration
TCLP	toxicity characteristic leaching procedure
TCRs	tribal cultural resources
the Board	Sacramento Municipal Utility District's Board of Directors
UAIC	United Auburn Indian Community
VELB	Valley Elderberry Longhorn Beetle

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1.0 Introduction

On November 18, 2024, the Sacramento Municipal Utility District (SMUD) released for public review the recirculated draft environmental impact report (Draft EIR) for the proposed Station J Bulk Transmission Substation Project (project). The EIR describes the existing conditions of the project site, analyzes the potential environmental impacts of the project, and identifies mitigation measures where necessary and available to avoid or reduce the magnitude of potentially significant impacts of the project. The project would include demolition of existing on-site structures and construction of new infrastructure to support up to six 40 megavolt-amperes (MVA) 115/21 Kilovolt (kV) transformers for a total of up to 240 MVA, including up to 9 miles of overhead and underground 115kV and 21kV connections into the substation from nearby existing SMUD facilities and infrastructure.

1.1 Public Review and Responses to Comments

In accordance with Sections 15087 and 15105 of the State California Environmental Quality Act (CEQA) Guidelines, the Draft EIR was recirculated for public review and comment to responsible and regulatory agencies, as well as members of the public, for 45 days (November 18, 2024 through January 6, 2025). SMUD also held a public meeting on December 11, 2024 to receive comments on the recirculated Draft EIR. Written comment letters received on the recirculated Draft EIR consisted solely of one letter, which is provided in its entirety in Chapter 2, "Comments and Responses to Comments."

SMUD also received comment letters during the original public review of the Draft EIR (October 4, 2024, through November 17, 2023), which led to some of the text changes reflected in the recirculated Draft EIR. Copies of those comment letters are provided in Appendix A to this Final EIR.

The recirculated Draft EIR, Final EIR, and associated appendices are available for review online at: https://www.smud.org/en/Corporate/About-us/Reliability/Station-J-substation

As required by State CEQA Guidelines Section 15088(b), SMUD has provided an electronic copy (through SMUD's website) of responses to comments to each public agency, organization, and individual that submitted written comments on the recirculated Draft EIR at least 10 days prior to certification of the Final EIR.

1.2 Organization of the Responses to Comments

Chapter 2 of the Final EIR consists of the one written comment received on the Recirculated Draft EIR.

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 address

environmental issues and indicate where issues raised are not environmental or address the merits of the project. In the latter instance, no further response is provided.

1.4 Project Decision Process

This document and the recirculated Draft EIR together constitute the Final EIR, which will be considered by the Board before a decision on whether to approve the project. If the Board decides to approve the project, it must first certify that the Final EIR was completed 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. This EIR does not identify any significant and unavoidable impacts (those that cannot be mitigated to a less-than-significant level) that would result from the project; therefore, a statement of overriding considerations, pursuant to State CEQA Guidelines Section 15093, is not warranted. A Mitigation Monitoring and Reporting Program, which is required by CEQA Guidelines Section 15091(d), has been included as Chapter 3 of this Final EIR.

1.5 Revisions to the Draft EIR

As discussed in Section 1.1, "Public Review and Response to Comments," above, CEQA requires recirculation of an EIR when the lead agency adds "significant new information" to an EIR, regarding changes to the project description or the environmental setting, after public notice is given of the availability of a draft EIR for public review under State CEQA Guidelines, California Code of Regulations (CCR) Section 15087, but before EIR certification (State CEQA Guidelines CCR Section 15088.5[a]). Recirculation is not required unless the EIR is changed in a way that would deprive the public of the opportunity to comment on significant new information, including a new significant impact in which no feasible mitigation is available to fully mitigate the impact (thus resulting in a significant and unavoidable impact), a substantial increase in the severity of a disclosed environmental impact, or development of a new feasible alternative or mitigation measures that would clearly lessen environmental impacts but that the project proponent declines to adopt (State CEQA Guidelines CCR Section 15088.5[a]). Recirculation is not required when the new information added to the EIR merely clarifies or amplifies the existing discussion or makes insignificant modifications in an adequate EIR (State CEQA Guidelines CCR Section 15088.5[b]).

No revisions to the recirculated Draft EIR were made following the public review period. Therefore, recirculation of the EIR is not required.

2.0 Comments and Responses to Comments

This section of the Final EIR contains comment letters received during the public review period for the recirculated Draft EIR. In conformance with CEQA Guidelines Section 15088(a), written responses to comments on environmental issues received from reviewers of the recirculated Draft EIR were prepared, including both written and oral comments.

Table 2-1 identifies a number for each comment letter received, the author of the comment letter, and the date of the comment letter. Each comment letter is included in its entirety for decision maker consideration before each response.

Table 2-1. Comments Received on the Recirculated Draft EIR

Letter #	Commenter	Date
1	Roberto Ramirez, Air Quality Planner/Analyst, Sacramento Metropolitan Air Quality Management District	January 2, 2025

2.1.1 Comment Letter 1

From: Roberto Ramirez
To: Rob Ferrera
Subject: [EXTERNAL] No Comment - Recirculated Draft Environmental Impact Report for the Station J Bulk Transmission Substation Project
Date: Thursday, January 2, 2025 12:32:48 PM
Attachments: Outlook-xbp3n1ud.png
Outlook-l0acwxzu.png

CAUTION: This email originated from outside of SMUD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Rob,

Thank you for giving us the opportunity to review the Recirculated Draft Environmental Impact Report for the Station J Bulk Transmission Substation Project. We have no comments at this time.

Thank you,

Roberto Ramirez
Air Quality Planner/Analyst
ISA Certified Arborist #WE-14276A
Transportation & Climate Change
Desk: (916) 704-4552
www.AirQuality.org
@AQMD

2.1.2 Response to Comment Letter 1

Comment noted. SMUD thanks Sacramento Metropolitan Air Quality Management District for taking the time to review the recirculated Draft EIR for the Station J Bulk Transmission Substation Project.

3.0 Corrections and Revisions to the Draft EIR

No corrections or specific text changes have been made to the Draft EIR since its publication and public review. Text deletions that are shown in strikethrough (~~strikethrough~~), and text additions that are shown in underline (<u>underline</u>) represent the Draft EIR at the time of recirculation.

4.0 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 Station J Bulk Transmission Substation Project, as set forth in the 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 these impacts to a less-than-significant-level.

This MMRP will be adopted by SMUD if 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 3-1 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 contractor 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 consistent with the MMRP requirements. 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.

- **Impact** – This column provides the verbatim text of the impact statement included in the EIR.
- **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., prior to construction, during construction, prior to 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.

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
Impact 3.2-1. Conflict with or obstruct implementation of the applicable air quality plan?	**Mitigation Measure 3.2-1a: SMAQMD Basic Construction Emission Control Practices** The construction contractor shall include as a condition in the grading, improvement, and demolition plans, the following basic construction emissions control practices (best management practices) to be initiated at the start and maintained throughout the duration of construction. • Control of fugitive dust as required by SMAQMD Rule 403. • 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. • 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. • Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry powered sweeping is prohibited. • Limit vehicle speeds on unpaved roads to 15 miles per hour (mph). • 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. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. • Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html	During construction	During construction	Contractor	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	• Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.				
	Mitigation Measure 3.2-1b: SMAQMD PM Operational Best Management Practices The applicant shall include as a condition of the Transmission Facilities Permit, the following best management practices for fugitive dust control during operational and maintenance activities associated with the project: • Limit vehicle speeds on unpaved roads to 15 mph. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. • Compliance with anti-idling regulations for diesel powered commercial motor vehicles (greater than 10,000 gross vehicular weight rating). The current requirements include limiting idling time to 5 minutes and installing technologies on the vehicles that support anti-idling. Information can be found on the California Air Resources Board's website: https://ww2.arb.ca.gov/ourwork/programs/idle-reduction-technologies/idle-reduction-technologies.	During construction	During construction	Contractor	SMUD
Impact 3.2-2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	**Mitigation Measure 3.2-1a: SMAQMD Basic Construction Emission Control Practices** (see above) **Mitigation Measure 3.2-1b: SMAQMD PM Best Management Practices** (see above)	During construction	During construction	Contractor	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
Impact 3.3-1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	**Mitigation Measure 3.3-1a: Valley Elderberry Longhorn Beetle** • Elderberry shrubs within 150 feet of the project disturbance area shall be mapped and avoided to the extent possible. Shrubs to be avoided shall be identified and flagged by a qualified biologist. • A 20-foot minimum avoidance buffer shall be established from the dripline of each avoided shrub. No work shall occur within the buffer area. • High-visibility construction fencing shall be installed along the 20-foot avoidance buffer. • If feasible, construction activities within 150 feet of an elderberry shrub shall not occur during the VELB flight season (March through July).	Elderberry shrubs to be identified and mapped, and avoidance buffers established, by a qualified biologist prior to construction. Buffers to be maintained during construction by the Contractor.	During construction	Qualified Biologist, Contractor	SMUD
	Mitigation Measure 3.3-1b: Nesting Birds • A nesting bird survey shall be conducted within the project site (for raptors and non-raptors) and a 500-foot buffer (for raptors only) prior to commencing with earth-moving or construction work if this work would occur during the typical nesting season (between February 1 and August 31). • If nesting birds are identified during the surveys, a qualified biologist will determine an appropriate disturbance-free buffer zone and clearly demarcate the buffer zone in the field for avoidance by construction activities. • The size of an established buffer may be altered if a qualified biologist conducts behavioral observations and determines the nesting birds are well acclimated to disturbance. If this occurs, the biologist shall prescribe a modified buffer that allows sufficient room to prevent undue disturbance/harassment to the nesting birds. If the buffer is reduced, the qualified biologist shall remain on site to monitor the behavior of the nesting birds during construction in order to ensure that the reduced buffer does not result in take of eggs or nestlings. • No construction or earth-moving activity shall occur within the established buffer until it is determined by a qualified biologist that the young have fledged (are no longer dependent on the	Surveys to be conducted by a qualified biologist prior to construction occurring in the typical nesting season. Buffers to be maintained during construction by the Contractor.	During construction in the typical nesting season	Qualified Biologist, Contractor	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	nest or the adults for feeding) and have attained sufficient flight skills to avoid project construction zones. This typically occurs by August 31. This date may be earlier or later and shall be determined by a qualified biologist. If a qualified biologist is not hired to monitor the nesting raptors, then the full buffer(s) shall be maintained in place from February 1 through the month of August. The buffer may be removed, and work may proceed as otherwise planned within the buffer on September 1.				
Impact 3.3-5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	**Mitigation Measure 3.3-5: Tree Removal** • To the maximum extent feasible, the project design shall avoid the loss of any protected tree (City or private). SMUD shall retain a certified arborist to survey trees in the project area including potential laydown areas and identify and evaluate trees that will be removed. If the arborist's survey does not identify any protected trees that would be removed or damaged as a result of the proposed project, no further mitigation is necessary. • If protected trees or their canopy are identified within the affected area, measures shall be taken to avoid impacts on protected trees as detailed in the City's tree ordinance. Protected trees that are lost as a result of the project shall be replaced according to the provisions of the ordinance and in alignment with an approved tree replacement plan (Section 12.56.060). Removed trees will generally require replacement at a 1:1 ratio. Tree replacement shall occur after project construction and will be monitored by a certified arborist.	Tree surveys to be conducted by a certified arborist before construction. Tree replacement to occur after project construction for any removed trees.	Post-construction in accordance with City's tree ordinance requirements	SMUD, Certified Arborist	SMUD, Certified Arborist
Impact 3.4-2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	**Mitigation Measure 3.4-2: Halt ground-disturbing activity upon discovery of subsurface archaeological features or Tribal cultural resources** In the event that any pre-contact or historic-era subsurface archaeological features or Tribal cultural resources (TCRs) or cultural deposits, including locally darkened soil ("midden"), that could conceal cultural deposits are discovered during construction, all ground-disturbing activity within 100 feet of the resources shall be halted and a qualified professional archaeologist and a Tribal Representative from the consulting Tribe shall be retained to assess the significance of the find. If the find is determined to be	During construction	During construction	SMUD, Contractor, Qualified Archaeologist	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	significant by the qualified archaeologist or Tribal Representative (i.e., because it is determined to constitute either an historical resource, a unique archaeological resource, or a tribal cultural resource), the archaeologist or Tribal Representative shall develop appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include, but would not necessarily be limited to, preservation in place (which shall be the preferred manner of mitigating impacts to archaeological sites and TCRs), archival research, subsurface testing, or contiguous block unit excavation and data recovery (when it is the only feasible mitigation, and pursuant to a data recovery plan). If the discovery constitutes a TCR, any data recovery shall be in coordination with Tribes. Curation of resources is not recommended under Tribal protocol and reburying of resources where, or in close proximity to where they were excavated, is preferred. Note that all archaeologists, Tribal Representatives, and Tribal Monitors shall meet the appropriate level of safety training (e.g., confined spaces, hazardous material exposure, etc.) in compliance with California Division of Occupational Safety and Health State and federal Occupational Safety and Health Administration requirements prior to entering construction work areas.				
Impact 3.4-2. Disturb any human remains, including those interred outside of formal cemeteries?	**Mitigation Measure 3.12-1a: TCRs and Human Remains** Although surface level TCRs, including human remains, have not been identified for this project, Tribal consultation has shown that there is the potential for unidentified sites of cultural significance to be present in the subsurface context. The following mitigation measure was provided by UAIC and is intended to address the evaluation and treatment of inadvertent/unanticipated discoveries of potential TCRs, archaeological, or cultural resources during a project's ground-disturbing activities. If any suspected TCRs or resources of Tribal cultural significance, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any	During construction	During construction	SMUD to complete any required consultation with Tribal representatives. Contractor to implement protective treatment measures.	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. A Tribal Representative from a California Native American Tribe that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary. When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. If redesign is determined to not be feasible, SMUD shall continue consultation with Tribes to determine appropriate treatment of the find. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by the California Native American Tribe that is traditionally and culturally affiliated with the project area. The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects and belongings, and reburial of cultural objects and belongings or cultural soil. The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size				

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored. The construction contractor(s) and SMUD shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request. Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner. Work at the TCR discovery location shall not resume until authorization is granted by the Lead Agency in coordination with the culturally affiliated Tribe. If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the Sacramento County Coroner shall be contacted immediately. Upon determination by the Sacramento County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with SMUD to define appropriate treatment and disposition of the burials. Note that all archaeologists, Tribal Representatives, and Tribal Monitors shall meet the appropriate level of safety training (e.g., confined spaces, hazardous material exposure, etc.) in compliance with California Division of Occupational Safety and Health State and federal Occupational Safety and Health Administration requirements prior to entering construction work areas.				
	Mitigation Measure 3.12-1b: Forensic Canines In consultation with the California Native American Tribe that is traditionally and culturally affiliated with the project area, SMUD will obtain the service of forensic canines to determine the potential for the presence of human remains following site demolition of buildings and hardscape surfaces (e.g., foundations and parking areas). If the results are positive an appropriate burial mitigation	During construction	During and after construction	SMUD	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	plan will be developed and implemented in consultation with the California Native American Tribe that is traditionally and culturally affiliated with the project area. Avoidance and preservation in place will be the first option considered where feasible.				
	Mitigation Measure 3.12-1c: Cultural Resources Awareness Training A cultural resources awareness respect training program will be provided to all construction personnel active on the project site prior to implementation of earth moving activities. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the cultural resources awareness training program in coordination with a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists. The program will include relevant information regarding sensitive Tribal cultural resources, including protocols for resource avoidance, applicable laws regulations, and the consequences of violating them. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any find of significance to Native Americans and protocols, consistent, to the extent feasible, with Native American Tribal values.	Before and during construction	During construction	SMUD, Contractor, Qualified Archaeologist	SMUD
Impact 3.6-5. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**Mitigation Measure 3.6-5: Pre-Construction Training and Resource Evaluation by Qualified Paleontologist** If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery and SMUD shall be notified. SMUD shall retain a qualified paleontologist to evaluate the resource. If the discovery is identified as potentially significant, additional work, such as recovery, laboratory preparation, fossil identification, curation, and reporting, may be necessary. Recovered paleontological resources should be deposited in an appropriate fossil repository to be determined by SMUD in consultation with the qualified paleontologist.	Before and during construction	During construction	SMUD, Contractor, Qualified Paleontologist	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
Impact 3.8-1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**Mitigation Measure 3.8-1a: Implement a Soil and Groundwater Management Plan** SMUD and its Contractor shall prepare and implement a Soil and Groundwater Management Plan to address contaminant-impacted soil and groundwater. The Plan shall address the apparent petroleum-impacted soil in the vicinity of boring B-4 by further delineating the petroleum-impacts and then excavating and disposing of this soil prior to commencing construction. This activity could be carried out as pre-construction activities or as part of the first construction phase. Excess soil generated at the site shall be properly characterized prior to off-site disposal and disposed of at a waste facility permitted to accept the waste. Based on the STLC/TCLP results, it is possible that some soil removed during construction activities will require transportation to a California hazardous waste landfill, due to the STLC exceedances and near exceedances. Soils from the Railyards should not be exported to any other sites outside the Railyards for any purpose other than disposal at a regulated facility without prior approval from DTSC. In the unlikely event that groundwater is encountered and dewatering required during project construction, SMUD will adhere to requirements in SWRCB's Water Quality Order 2003-0003-DWQ and, within the Railyards, request approval from DTSC prior to implementation of the groundwater management plan. Water would be collected, tested, and treated prior to discharge, in accordance with all regulatory requirements.	Before and/or during construction	Before and/or during construction	SMUD, Contractor	SMUD
	Mitigation Measure 3.8-1b: Manage Accidental Discovery of Hazardous Materials If contaminated soils or potentially hazardous items are discovered during earth moving activities, all ground-disturbing activities within 50 feet shall be halted until a qualified SMUD employee or SMUD representative can assess the conditions on the site. SMUD will notify the appropriate agency (e.g., SCEMD) to determine next steps for managing the potentially hazardous materials. If it is determined that the hazardous material cannot be re-incorporated into the project site, it shall be hauled by a qualified hauler to an appropriate waste disposal facility.	During construction	During construction	SMUD, Contractor	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
Impact 3.8-2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	**Mitigation Measure 3.8-1a: Implement a Soil Management Plan** (see above) **Mitigation Measure 3.8-1b: Manage Accidental Discovery of Hazardous Materials** (see above)	Before and/or during construction	Before and/or during construction	SMUD, Contractor	SMUD
Impact 3.8-4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	**Mitigation Measure 3.8-1a: Implement a Soil Management Plan** (see above) **Mitigation Measure 3.8-1b: Manage Accidental Discovery of Hazardous Materials** (see above)	Before and/or during construction	Before and/or during construction	SMUD, Contractor	SMUD
Impact 3.10-1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	**Mitigation Measure 3.10-1a: Construction Noise Reduction** The contractor shall ensure that the following measures are implemented during all phases of project construction: • Whenever construction occurs adjacent to occupied residences (on or offsite) temporary barriers shall be constructed around the construction sites to shield the ground floor of the noise sensitive uses. These barriers shall be of ¾-inch Medium Density Overlay (MDO) plywood sheeting, or other material of equivalent utility and appearance, and shall achieve a Sound Transmission Class of STC-30 or greater, based on certified sound transmission loss data taken according to American Society for Testing and Materials International (ASTM) Test Method E90. • Construction activities shall comply with the City of Sacramento Noise Ordinance, which limits such activity to the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday, the	During construction	During construction	Contractor	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	hours of 9:00 a.m. to 6:00 p.m. on Sunday, prohibits nighttime construction unless authorized by the director of building inspections for a period no greater than three days, and requires the use of exhaust and intake silencers for construction equipment engines. • Construction equipment staging areas shall be located as far as feasible from residential areas while still serving the needs of construction contractors. • Activities that generate high noise levels such as pile driving and the use of jackhammers, drills, and impact wrenches, shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday. • Smaller excavators and bulldozers shall be used during the demolition of the existing building within 25 feet of the building on the northwest site boundary, and this activity shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday only.				
	Mitigation Measure 3.10-1b: Employ Noise-Reducing Construction Measures for Project Construction Truck Traffic SMUD and its construction contractor(s) will implement the following measures: • Establish and enforce construction site and haul road speed limits to less than 15 mph. • Route construction-related truck traffic along roadways that will cause the least disturbance to residents. • Use high-grade engine exhaust silencers and engine-casing sound insulation.	During construction	During construction	SMUD, Contractor	SMUD
Impact 3.10-2. Generation of excessive groundborne vibration or groundborne noise levels?	**Mitigation Measure 3.10-2: Employ Vibration-Reducing Construction Measures for Demolition and Construction Adjacent to Impacted Building** • Enhanced Pre-Demolition Survey: Conduct detailed structural assessments using laser scanning or 3D modeling to document potential weaknesses with high precision.	Before and during construction	Before and during construction	SMUD	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	• Advanced Controlled Demolition Techniques: Utilize diamond wire sawing or hydrodemolition to minimize vibrations. Implement a highly controlled, piece-by-piece demolition method. • Real-Time Vibration Monitoring: Install multiple vibration sensors on the impacted building for real-time monitoring. Set up an alert system for instant notifications if vibrations approach critical levels. • Enhanced Buffer Zones: Create double-layer buffer zones using heavy-duty materials like thick rubber mats and geofoam barriers. Implement additional protective measures such as temporary walls filled with sound and vibration absorbing materials. • High Precision Equipment Selection: Use state-of-the-art demolition equipment designed for low vibration output. Ensure machinery operates at optimal performance levels. • Specialized Operational Modifications: Schedule vibration-intensive activities during periods when the adjacent building is unoccupied, if possible. Employ a staggered approach to demolition activities to distribute the vibration load over time. • Enhanced Structural Support: Use advanced shoring systems like hydraulic shoring or steel bracing for robust temporary support. Conduct regular inspections of the support systems. • Advanced Ground Stabilization: Employ deep soil mixing or grouting techniques to stabilize the ground and reduce vibration transmission. Use vibration isolation pads or trenches around the demolition site. • Comprehensive Communication Plan: Establish a direct line of communication with stakeholders for real-time updates and feedback. Provide detailed schedules and daily reports on demolition activities and monitoring results. • Thorough Post-Demolition Inspection and Remediation: Conduct a comprehensive post-demolition survey using visual inspections and advanced non-destructive testing methods. Promptly address any issues, including structural repairs or further stabilization measures.				

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
Impact 3.11-3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	**Mitigation Measure 3.11-3a: Protect Bike Facilities** SMUD shall prepare site plans showing all required bikeway facilities in compliance with City of Sacramento Standards. The Project entitlements shall be conditioned to provide the required bikeway facilities as part of an improvement plan which includes alternate on-street and separated bikeway facilities that connect to the City's bicycle network. The project applicant shall work with the City to ensure that the proposed bikeway facilities would achieve the intent of the Bikeway Master Plan and meet the City's standards. Modifications to the proposed bikeways shall be made to satisfy the requirements of the City.	Before and during construction	Before and during construction	SMUD	SMUD
	Mitigation Measure 3.11-3b: Repair Damaged Roadways and Bike Paths Following Construction During project construction, signage and flaggers will be deployed at locations where construction trucks cross roadways, pedestrian routes and bikeways, to reduce the potential hazard posed to other drivers, pedestrians, and bicyclists. Details regarding traffic control, including any alternate access routes to existing facilities and timing of control measures, will be further described in a Traffic Control Plan to be submitted for approval by the City of Sacramento. Furthermore, following completion of construction, SMUD will assess and repair any project-related damage to roadways and paved bicycle/pedestrian paths that were affected during construction, including all project-related potholes, fractures, or other damages.	During and after construction	During and after construction	Contractor, SMUD	SMUD
Impact 3.12-1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined	**Mitigation Measure 3.4-2: Halt ground-disturbing activity upon discovery of subsurface archaeological features or Tribal cultural resources** (see above) **Mitigation Measure 3.12-1a: TCRs and Human Remains** Although surface level TCRs, including human remains, have not been identified for this project, Tribal consultation has shown that there is the potential for unidentified sites of cultural significance to be present in the subsurface context. The following mitigation measure was provided by UAIC and is intended to address the	During construction	During construction	SMUD, Contractor	SMUD

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or** **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**	evaluation and treatment of inadvertent/unanticipated discoveries of potential TCRs, archaeological, or cultural resources during a project's ground-disturbing activities. If any suspected TCRs or resources of Tribal cultural significance, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. A Tribal Representative from a California Native American Tribe that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary. When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. If redesign is determined to not be feasible, SMUD shall continue consultation with Tribes to determine appropriate treatment of the find. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by the California Native American Tribe that is traditionally and culturally affiliated with the project area. The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural				

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects and belongings, and reburial of cultural objects and belongings or cultural soil. The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored. The construction contractor(s) and SMUD shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request. Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner. Work at the TCR discovery location shall not resume until authorization is granted by the Lead Agency in coordination with the culturally affiliated Tribe. If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the Sacramento County Coroner shall be contacted immediately. Upon determination by the Sacramento County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with SMUD to define appropriate treatment and disposition of the burials. Note that all archaeologists, Tribal Representatives, and Tribal Monitors shall meet the appropriate level of safety training (e.g., confined spaces, hazardous material exposure, etc.) in compliance with California Division of Occupational Safety and Health State and federal Occupational Safety and Health Administration requirements prior to entering construction work areas.				

Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
				Implementation	Monitoring
	Mitigation Measure 3.12-1b: Forensic Canines In consultation with the California Native American Tribe that is traditionally and culturally affiliated with the project area, SMUD will obtain the service of forensic canines to determine the potential for the presence of human remains following site demolition of buildings and hardscape surfaces (e.g., foundations and parking areas). If the results are positive an appropriate burial mitigation plan will be developed and implemented in consultation with the California Native American Tribe that is traditionally and culturally affiliated with the project area. Avoidance and preservation in place will be the first option considered where feasible.	During construction	During construction	SMUD	SMUD
	Mitigation Measure 3.12-1c: Cultural Resources Awareness Training A cultural resources awareness respect training program will be provided to all construction personnel active on the project site prior to implementation of earth moving activities. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the cultural resources awareness training program in coordination with a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists. The program will include relevant information regarding sensitive Tribal cultural resources, including protocols for resource avoidance, applicable laws regulations, and the consequences of violating them. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and protocols, consistent, to the extent feasible, with Native American Tribal values.	Before and during construction	During construction	SMUD, Contractor, Qualified Archaeologist	SMUD

5.0 References

5.1 Chapter 1, Introduction

No references cited.

5.2 Chapter 2, Response to Comments

No references cited.

5.3 Chapter 3, Revisions to the Draft EIR

No references cited.

5.4 Chapter 4, Mitigation Monitoring and Reporting Program

No references cited.

6.0 List of Preparers

6.1 Sacramento Municipal Utility District (Lead Agency)

Rob Ferrera ..... Project/Task Manager

6.2 AECOM (Preparation of EIR)

Petra Unger ..... Program Manager
Jeff Thomas…..… ..... Task Manager/CEQA Lead
Emily Biro… ..... Deputy Task Manager
Danny DeBrito…...Deputy Task Manager, Aesthetics, Utilities and Service Systems, Alternatives
Susanne McFerran ..... Air Quality, Energy, Greenhouse Gas Emissions
Mary Nooristani..... Air Quality, Energy, Greenhouse Gas Emissions
Paola Pena ..... Air Quality, Energy, Greenhouse Gas Emissions
Richard Deis ..... Cultural Resources, Tribal Cultural Resources
Chandra Miller ..... Cultural Resources
Wendy Copeland ..... Geology and Soils
Issa Mahmodi ..... Noise and Vibration, Transportation
Jenifer King..... Other CEQA – Environmental Justice Evaluation
Lisa Clement..... GIS Specialist
Vivian Gaddie..... Graphics
Deborah Jew..... Document Preparation

6.3 Other Staff

Area West Staff…… ..... Hazards & Hazardous Materials, Hydrology & Water Quality
Bargas Staff ..... Biological Resources, Paleontological Resources

APPENDIX A
COMMENT LETTERS FROM 1ST PUBLIC REVIEW PERIOD

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gavin Newsom
Governor

November 2, 2023

Rob Ferrera
Environmental Specialist & Tribal Relations Coordinator
SMUD
6201 S Street
Sacramento, CA 95817

RE: DRAFT ENVIRONMENTAL INPACT REPORT (DEIR) FOR THE STATION J BULK TRANSMISSION SUBSTATION PROJECT DATED OCTOBER 04, 2023 STATE CLEARINGHOUSE # 2023020549

Dear Rob Ferrera:

The Department of Toxic Substances Control (DTSC) received a DEIR for the Station J Bulk Transmission Substation Project. The Station J Bulk Transmission Substation Project includes construction and operation of a new substation housing electrical equipment, including power transformers, gas insulated equipment, and a control building. Station J would include up to five 40 MVA 115/21 kV transformers to serve the SMUD network. Initial installation of two 40 MVA transformers is anticipated to occur by 2030. The project would also include up to 7 miles of overhead and underground 115kV and 21kV connections into the substation from nearby existing SMUD facilities and infrastructure. The site also includes space for expansion as future needs are identified.

DTSC has identified that this Project may affect a potentially hazardous site, SP-Purity Oil that is located at 1324 A Street Sacramento, California 95814 Historically, the site was owned by Southern Pacific Transportation Company (SP), a portion of the site was leased for use as a waste oil reprocessing facility from 1966 to 1978. The western portion of the site is currently vacant. The eastern portion of the site was formerly occupied by Lonestar Cement and is currently used for transitional cottage housing units for the homeless. Several soil removal actions have been completed from 1985 to the present. Ground water monitoring continues. Lead and oil contaminated soil and ground water with VOC's have been found at the site. All cleanup has been completed

and the Land Use Covenant was terminated in 2014.Based on our Project review, we request the consideration of the following comment:

> In section 3.8.2 Hazards and Hazardous Materials Environmental Setting of the DEIR, the section on groundwater conditions at Purity Oil is accurate; however, DTSC recommends the mention of 1,2-dichlorethane (1,2-DCA) be included for completeness. The June 28, 2013 DTSC certification letter states, "The 1,2-DCA levels fluctuating around the cleanup goal [maximum contaminant level (MCL)] are detected in the general area and may be associated with an upgradient offsite source. 1,2-DCA is only found in the shallow aquifer which is not a source for drinking water." The August 14, 2014 land use covenant termination states, "The remaining contaminant in groundwater is 1,2-DCA. Although very low levels of 1,2-DCA are still present in groundwater, the level is statistically within range of the [MCL] of 0.5 parts per billion allowed in drinking water."

DTSC appreciates the opportunity to comment on the Station J Bulk Transmission Substation Project Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via email for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control

cc: Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

Ruth Cayabyab
Supervising Hazardous Substance Engineering
Site Mitigation and Restoration Program
Department of Toxic Substances Control
Ruth.Cayabyab@dtsc.ca.gov

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

November 16, 2023

Rob Ferrara
Sacramento Municipal Utilities District
6201 S Street, MS B203
Sacramento, CA 95817-1899

Subject: **Station J Bulk Transmission Substation Draft Environmental Impact Report**
State Clearinghouse # 2023020549

Dear Rob Ferrara:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Draft Environmental Impact Report (EIR) for Sacramento Metropolitan Utilities District (SMUD) Station J Bulk Transmission Substation Project (Project) under the California Environmental Quality Act (CEQA). The Project would consist of the demolition of existing on-site structures and construction of new infrastructure to support up to five 40 megavolt amperes (MVA) 115/21kV transformers for a total of up to 200 MVA, including up to 8 miles of overhead and / or underground 115kV and 21kV connections into the substation from nearby existing SMUD facilities and infrastructure. Please accept the following recommendations on project implementation and modifications to the Draft EIR, to benefit air quality and public health, to reduce greenhouse gas (GHG) emissions, and to ensure full public disclosure of project air quality and climate impacts.

Demolition
Due to the health risks posed by public exposure to asbestos, demolition and renovation of existing buildings is subject to Sac Metro Air District Rule 902, to limit asbestos exposure during these activities. Sac Metro Air District staff is available to review notifications and answer asbestos related questions, either by emailing asbestos@airquality.org, or calling 279-207-1122.

Construction
Because this project is located in the City of Sacramento's River District Specific Plan area, Sac Metro Air District strongly recommends implementing the mitigation measures for construction-related air quality and climate impacts in the Mitigation Monitoring Program in the River District Specific Plan EIR.

In the proposed project EIR, table 3.2-4. Summary of Construction-Related Emissions of Criteria Air Pollutants and Precursors (page 3-2-21) shows that the maximum annual emission for PM_{10} and $PM_{2.5}$ (tons per year) are 0.34 and 0.17, respectively. Please clarify why the CalEEMod results in Appendix B of the EIR show different values (0.31 and 0.14).

In addition, Appendix B does not show the default changes for construction. Please update CalEEMod construction results to show Section 8 – User Changes to Default Data.

Operations: Greenhouse Gas Emissions
The Draft EIR analysis of GHG emissions finds that the project greenhouse gas emissions are less than significant because the project does not exceed the Sac Metro Air District's greenhouse gas thresholds.

Page 3.7-12 of the Draft EIR further indicates that "In addition, the project would not include any natural gas infrastructure, and would therefore, be consistent with SMAQMD Best Management Practice 1. Furthermore, the project is not a typical land use development that would be required to comply with CALGreen requirements, such as commercial and residential land use developments, and SMAQMD Best Management Practice 2 would not be applicable."

- In the paragraph above Table 3.7-2 (pg. 3.7-12), it mentions that the proposed project would "generate up to 3,110 metric tons of CO_2e per year." Please clarify where this value comes from. It is not in the table it references, or in the CalEEMod results in Appendix B. The tables and text in the report should be consistent with the CalEEMod results.
- In the second to last paragraph of page 3.7-13, it mentions "...goals and commitments in SMUD's 20230 Zero Carbon Plan...". Please clarify if this is meant to say "2023" or "2030".

River District Specific Plan
With a CalEnviroScreen 4.0 score of 99, the River District Specific Plan (RDSP) area, is one of the most disadvantaged communities in California. Located on 14th Street, the project is adjacent to a closed underpass between the River District and Mansion Flats, which the RDSP envisions as an important active modes connection as redevelopment occurs and safety issues are addressed.

- Sac Metro Air District recommends the project incorporate thoughtful and high-quality active modes design, since the project will likely create inactive uses on 14th Street. This would ensure the project does not "Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities," as stipulated by CEQA Handbook Appendix G Question XVII a). One example mentioned in the RDSP involves the future re-establishment of the new North 14th Street Underpass. Incorporating high-quality active modes during the design process would ensure that the new North 14th Street Underpass, as well as other goals in the RDSP, are supported.

Conclusion
Thank you for your attention to our comments. If you have questions about them, please contact me at rramirez@airquality.org or 916-704-4552.

Sincerely,

-RR

Roberto Ramirez
Air Quality Planner / Analyst

cc: Paul Philley, AICP, CEQA & Land Use Program Supervisor, Sac Metro Air District

Sacramento Citadel - Alhambra Campus
2550 Alhambra Blvd Sacramento, California 95817
Corps Office/Alhambra Campus Administration (916) 469-4600
Ray Robinson Oak Park Community Center (916) 469-4620
Alhambra Preschool (916) 469-4630

VIA FIRST CLASS AND ELECTRONIC MAIL

SMUD Environmental Services
P.O. Box 15830 MS B203
Sacramento, CA 95817
ATTN: Rob Ferrera
Rob.Ferrera@smud.org

RE: Station J Bulk Transmission Substation Project
Draft Environmental Impact Report

Dear Mr. Ferrera:

We write to provide public comment on the Station J Bulk Transmission Substation Project's Draft Environmental Impact Report ("DEIR"). The proposed location for Substation J is a 10.3-acre site at 1220 North B Street, Sacramento. The Salvation Army's Center of Hope Shelter at 1200 North B Street is located immediately adjacent to the proposed location and is the largest homeless shelter in Sacramento County. The 140-bed shelter provides veterans, women and men with a 30-90 stay focused on overcoming homelessness. Clients at the shelter receive case management and job preparation workshops to help clients find permanent housing. In addition to food and lodging, available services include spiritual and emotional counseling, employment referral services, information and referral to help resolve legal issues and help in reconnecting with family members.

While the Army is very appreciative of its relationship with SMUD, we are nonetheless very concerned with the location of the proposed substation immediately adjacent to the Army's shelter. The reality is that many of our clients experience mental illness and can be easily confused, disoriented and frightened by noises and lights that will likely be associated with a substation. Those suffering from mental disease can easily become reactive to these stimuli. While we recognize that the science regarding electromagnetic fields is in dispute, we are concerned that our clients may also react to the fear of proximity to the substation facility.

The DEIR acknowledges the nearby location of the Army property but fails to address its basic function as a homeless shelter – providing services to the neediest citizens of the community. While the DEIR does acknowledge that "homeless and impoverished persons have been a constant social feature of the area" (DEIR p.3.4-10), it does not address the unique impact

that noise, light, vibration and other factors might have on these individuals residing in such close proximity to the proposed location. Beyond the environmental impacts on the Army's clients, there is also the social equity and justice reality that this project's location is adjacent to some of the most impoverished citizens of our community.

In light of this, we question whether Alternative B, the Site 4 alternative location at the corner of North 7th Street and North B Street is a preferable alternative site. While it may involve environmental impacts associated with the presence and clean-up of contamination, it would eliminate the direct impacts and the social equity and justice impacts associated with locating the project in the proposed location so near to the Army and other organizations that provide similar services to the area's homeless population. However, the analysis of this alternative in the DEIR is essentially non-existent. While we understand that CEQA does not require the same level of analysis for alternatives that it does for a project, we have been advised that a simple description of the location and a rejection of the alternative due to unquantified additional costs associated with clean-up and contamination hardly seems to satisfy CEQA requirements for true consideration and comparison of an alternative with the project.

Thank you for the opportunity to comment. Please let us know if you have any questions or would desire to meet to discuss the matter further. We wish SMUD well in this effort but do hope that another location that is less impactful and recognizes social justice might be found.

Very truly yours,

Major Rio Ray

cc: David Bentley, Territorial Property Secretary
Jim Eldridge, Chair of Sacramento Advisory Board
Gregory Thatch, Sacramento Advisory Board
Major John Brackenbury, Divisional Commander

APPENDIX B
RECIRCULATED DRAFT EIR