

# Sacramento Municipal Utility District

## Pocket/Greenhaven 69kV Underground Cable Reliability Project

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Final Initial Study and Proposed Mitigated Negative Declaration •  
State Clearinghouse Number 2019089021 •  
October 7, 2019

Powering forward. Together.



# Sacramento Municipal Utility District

## Pocket/Greenhaven 69kV Underground Cable Reliability Project

Final Initial Study and Proposed Mitigated Negative Declaration •  
State Clearinghouse Number 2019089021 •  
October 7, 2019

### Lead Agency:

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or

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**ACRONYMS AND OTHER ABBREVIATIONS**

BACT	best available control technology
BMP	best management practice
Caltrans	California Department of Transportation
I-5	Interstate 5
IS/MND	Initial Study/Mitigated Negative Declaration
SMAQMD	Sacramento Municipal Air Quality Management District
SMUD	Sacramento Municipal Utility District

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## EXECUTIVE SUMMARY

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### Introduction

This Initial Study (IS) and Mitigated Negative Declaration (MND) has been prepared to evaluate the potential physical environmental impacts associated with Sacramento Municipal Utility District's (SMUD) Pocket/Greenhaven 69kV Underground Cable Reliability Project (project) in compliance with the California Environmental Quality Act (CEQA). SMUD is the lead agency responsible for complying with the provisions of CEQA.

### Project Description

The Sacramento Municipal Utility District (SMUD) proposes to replace approximately 2 miles of existing underground cable and construct up to 15 new manholes in the Pocket/Greenhaven neighborhood of the City of Sacramento. The project alignment begins southeast of the Florin Road interchange on Interstate 5 (I-5) at two riser poles located between I-5 and a drainage canal. The project alignment crosses beneath I-5 and runs in a northwest direction through a parking lot to Florin Road, where it heads west along the southern edge of Florin Road. The alignment continues to Gloria Drive, where it turns left and terminates at the Gloria-Florin distribution substation (approximately 400 feet west of Florin Road). The alignment splits at Havenside Drive, and continues south along Havenside Drive until it terminates at the Havenside-Canal distribution substation located immediately west of the Pocket Canal. For the areas beneath I-5 and Pocket Canal, existing underground lines would be removed and new line installed within conduit or via a new overhead crossing of I-5. For the remainder of the alignment, the underground cable would be replaced via open trenching.

### Findings

As lead agency for compliance with CEQA requirements, SMUD finds that the project would be implemented without causing a significant adverse impact on the environment. Mitigation measures for potential impacts associated with Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Traffic and Transportation, and Tribal Cultural Resources would be implemented as part of SMUD's project through adoption of a mitigation monitoring and reporting program (MMRP).

### Cumulative Impacts

CEQA requires lead agencies to assess whether a project's incremental effects are significant when viewed in connection with the effects of other past, present, and foreseeable future projects. Based on the analysis presented in the Draft IS/MND, the project would not contribute incrementally to considerable environmental changes when considered in combination with other projects in the area. Therefore, the potential cumulative environmental effects of the project were determined to be less than

cumulatively considerable. All identified potentially significant impacts would be mitigated to less than significant.

## **Growth-Inducing Impacts**

SMUD exists as a public agency to supply electrical energy to customers in the Sacramento area. It has an obligation to serve all new development approved by the local agencies and Sacramento County. SMUD does not designate where and what new development may occur. The project would increase power levels and reliability in the City of Sacramento, but does not have the potential to foster economic or population growth. The project would be consistent with SMUD's established strategic direction, which includes meeting customers' electrical energy needs, and is consistent with long-range planning documents prepared by the City of Sacramento, such as the 2035 General Plan, and would support development at levels approved by the City as the governing land use authority.

## **Determination**

On the basis of this evaluation, SMUD concludes:

- The 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 project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The project would not have impacts that are individually limited, but cumulatively considerable.
- The 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 project would have a substantive negative effect on the environment.



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Rob Ferrera  
Environmental Management Specialist II

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October 7, 2019  
Date

## 1 Introduction

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### 1.1 Project Overview

The Sacramento Municipal Utility District (SMUD) proposes to replace approximately 2 miles of existing underground cable and construct up to 15 new manholes in the Pocket/Greenhaven neighborhood of the City of Sacramento. The project alignment begins southeast of the Florin Road interchange on Interstate 5 (I-5) at two riser poles located between I-5 and a drainage canal. The project alignment crosses beneath I-5 and runs in a northwest direction through a parking lot to Florin Road, where it heads west along the southern edge of Florin Road. The alignment continues to Gloria Drive, where it turns left and terminates at the Gloria-Florin distribution substation (approximately 400 feet west of Florin Road). The alignment splits at Havenside Drive, and continues south along Havenside Drive until it terminates at the Havenside-Canal distribution substation located immediately west of the Pocket Canal. For the areas beneath I-5 and Pocket Canal, existing underground lines would be removed and new line installed either within conduit or via a new overhead crossing of I-5. For the remainder of the alignment, the underground cable would be replaced via open trenching.

### 1.2 Environmental Process Summary

#### 1.2.1 *Review of the Draft IS/MND*

Copies of the Draft IS/MND were made available in hard copy form for public review at SMUD offices (Customer Service Center and East Campus Operations Center) a, posted on SMUD's public website, and were distributed to the State Clearinghouse via the Governor's Office of Planning and Research. A notice of intent was distributed to property owners and occupants of record within 1,000 feet of the project alignment. The 30-day public review period began on August 7, 2019 and ended on September 6, 2019. SMUD held a public meeting on August 20, 2019 at Elks Lodge #6 (6446 Riverside Boulevard in Sacramento). Two written comment cards were received at the public meeting. In addition, three comment letters were received from agencies during the comment period, as well as an email with comments submitted by a local resident. These six comment letters and SMUD's written responses to each comment received are presented in Section 2.0 of this document. As noted in Section 2.0, the conclusions presented in the Draft IS/MND were not altered in response to comments received.

#### 1.2.2 *Preparation of the Final IS/MND*

The comment letters were reviewed, and responses were prepared (see Section 2.0). Based on the comments received, there were no new environmental effects identified. The Final Initial Study/Mitigated Negative Declaration (IS/MND) does not incorporate any changes to the project description or to the Initial Study checklist responses in the Draft IS/MND (provided as Appendix A of this Final IS/MND).

## CEQA Guidelines

CEQA Guidelines Section 15073.5 provides the conditions for determining if recirculation of a negative declaration is required before 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 Section 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.*

SMUD has determined that none of the aforementioned conditions were satisfied following public notice; therefore, recirculation of the Draft IS/MND is not required. SMUD, as the lead agency, may proceed to present the Final IS/MND to the SMUD Board for action.

Circumstances under which recirculation is not required include:

(1) Mitigation measures are replaced with equal or more effective measures pursuant to Section 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])

No changes to the checklist in the Draft IS/MND is required; therefore, recirculation of the Draft IS/MND is not required.



### 1.3 Mitigation Measures

This section presents the mitigation measures SMUD would implement to address potential impacts on Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Traffic and Transportation, and Tribal Cultural Resources. These measures reflect text revisions as documented in the Final IS/MND.

#### 1.3.1 Air Quality

As discussed in Section 3.3 of the Draft IS/MND, project construction activities would result in temporary generation and emissions of criteria air pollutants and precursors. The modeling of anticipated construction-generated emissions revealed that the project, without the application of best management practices (BMPs) and best available control technology (BACT), would generate daily emissions of particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter in excess of the Sacramento Municipal Air Quality Management District (SMAQMD) thresholds. Mitigation Measure 3.3-1 requires SMUD's contractor to implement SMAQMD emission control practices and would reduce impacts to less than significant.

***Mitigation Measure 3.3-1: Implement SMAQMD Basic Construction Emission Control Practices.***

*During construction, the contractor shall comply with and implement SMAQMD's Basic Construction Emission Control Practices, which includes SMAQMD-recommended BMPs and BACT, for controlling fugitive dust emissions. Measures to be implemented during construction include the following:*

- *Water all exposed surfaces at least 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 (2) feet of freeboard space on haul trucks transporting soil, sand, or other loose material on the site. Cover any haul trucks that will be traveling along freeways or major roadways.*
- *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 power sweeping is prohibited.*
- *Limit vehicle speed on unpaved roads to 15 miles per hour.*
- *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][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.*

- *Maintain all construction equipment in proper working condition according to manufacturer's specifications. Equipment will be checked by a certified mechanic and determined to be running in proper condition before it is operated.*

### 1.3.2 *Biological Resources*

As discussed in detail in Section 3.4 of the Draft IS/MND, mature trees in the project alignment and adjacent area could support bird nests. To avoid disturbance to nesting birds, SMUD would implement the following mitigation measure to reduce impacts to less than significant.

#### ***Mitigation Measure 3.4-1: Avoid disturbance of nesting birds***

*If construction will occur during the nesting season, a SMUD project biologist/biological monitor will conduct pre-construction nesting bird surveys to determine if birds are nesting in the work area.*

*The pre-construction nesting bird surveys will identify on-site bird species and any nest-building behavior. If no nesting birds are found in or within 500 feet of the project alignment during the pre-construction clearance surveys, construction activities may proceed as scheduled.*

*If pre-nesting behavior is observed, but an active nest has not yet been established (e.g., courtship displays, but no eggs in a constructed nest), a nesting bird deterrence and removal program will be implemented. Such deterrence methods include removal of previous year's nesting materials and removal of partially completed nests in progress. Once a nest is situated and identified with eggs or young, it is considered to be "active" and the nest cannot be removed until the young have fledged.*

*Because bird species may breed multiple times in a season, monitoring for nesting birds will continue during the nesting season to address new arrivals. A qualified biologist will conduct bi-weekly nesting bird surveys of suitable nesting habitat in the construction area during the nesting season and deter establishment of nests by removing partial completed nests.*

*If an active nest is found in or within 500 feet of the project alignment during construction, a "No Construction" buffer zone will be established around the active nest (usually a minimum radius of 50 feet for passerine birds and 500 feet for raptors) to minimize the potential for disturbance of the nesting activity. The project biologist/biological monitor will determine and flag the appropriate buffer size required, based on the species, specific situation, tolerances of the species, and the nest location. Project activities will resume in the buffer area when the project biologist/biological monitor has determined that the nest(s) is (are) no longer active or the biologist has determined that with implementation of an appropriate buffer, work activities would not disturb the birds nesting behavior.*

*If special-status bird species are found nesting in or within 500 feet of the project alignment, the project biologist/biological monitor shall notify SMUD's project manager to notify CDFW or USFWS, as appropriate, within 24 hours of first nesting observation.*

### 1.3.3 Cultural Resources

A records search for the project alignment failed to identify any known historical or archaeological resources. However, it is possible that previously-undiscovered historical or archaeological resources could be located beneath the ground surface and could be adversely affected by project construction activities. Therefore, SMUD would implement Mitigation Measure 3.5-1 to reduce impacts related to archaeological resources to less than significant.

***Mitigation Measure 3.5-1: Worker awareness and response for cultural and tribal cultural resources***

*Prior to the start of construction, SMUD shall provide information to the construction contractor and SMUD's project superintendent regarding the potential for cultural and tribal cultural resources that could be encountered during ground disturbance, the regulatory protections afforded to such finds, and the procedures to follow in the event of discovery of a previously unknown resource, including notifying SMUD representatives.*

*If workers observe any evidence of prehistoric, historic, paleontological, or tribal cultural resources (e.g., freshwater shells, beads, bone tool remnants, bones, stone tools, grinding rocks, foundations or walls, structures, refuse deposits, or fossils), all work within 50 feet of the find shall cease immediately and SMUD representatives shall be notified. An archaeologist meeting the Secretary of the Interior's required qualifications or a paleontologist meeting the Society of Vertebrate Paleontology's minimum qualifications shall be consulted to assess the significance of the cultural or paleontological find and recommend appropriate measure for the treatment of the resource. Potential treatment may include no action (i.e., the resource is not significant), avoidance of the resource, or data recovery. If the resource may be of Native American origin, SMUD shall consult with the tribes to whom the resource could have importance.*

In addition, although records do not indicate the presence of human remains, it is possible that previously-undiscovered human remains could be encountered during project construction activities. SMUD would implement Mitigation Measure 3.5-2 to reduce potential impacts related to human remains to less-than-significant levels.

***Mitigation Measure 3.5-2: Halt ground disturbance upon discovery of human remains***

*If human remains are discovered during any project activities, potentially damaging ground disturbing activities within 100 feet of the remains shall be halted immediately, and SMUD shall notify the Sacramento County coroner and the NAHC immediately, as required by Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.05. If the remains are determined by NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the*

*remains. SMUD shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. Following the coroner's and NAHC's findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.*

#### 1.3.4 Geology and Soils

As discussed in Section 3.7 of the Draft IS/MND, project-related earthmoving activities would occur in the Pleistocene-age Riverbank Formation. Because numerous vertebrate fossils have been recovered from the Riverbank Formation in northern and central California, including localities that are close to the project site, this formation is considered to be paleontologically sensitive. While there are no known paleontological resources within the project alignment, implementation of Mitigation Measure 3.5-1 would reduce effects on previously unknown paleontological resources to less than significant.

##### ***Mitigation Measure 3.5-1: Worker awareness and response for cultural and tribal cultural resources***

*Prior to the start of construction, SMUD shall provide information to the construction contractor and SMUD's project superintendent regarding the potential for cultural and tribal cultural resources that could be encountered during ground disturbance, the regulatory protections afforded to such finds, and the procedures to follow in the event of discovery of a previously unknown resource, including notifying SMUD representatives.*

*If workers observe any evidence of prehistoric, historic, paleontological, or tribal cultural resources (e.g., freshwater shells, beads, bone tool remnants, bones, stone tools, grinding rocks, foundations or walls, structures, refuse deposits, or fossils), all work within 50 feet of the find shall cease immediately and SMUD representatives shall be notified. An archaeologist meeting the Secretary of the Interior's required qualifications or a paleontologist meeting the Society of Vertebrate Paleontology's minimum qualifications shall be consulted to assess the significance of the cultural or paleontological find and recommend appropriate measure for the treatment of the resource. Potential treatment may include no action (i.e., the resource is not significant), avoidance of the resource, or data recovery. If the resource may be of Native American origin, SMUD shall consult with the tribes to whom the resource could have importance.*

#### 1.3.5 Traffic and Transportation

Project construction would temporarily interfere with existing vehicle, transit, bicycle, and pedestrian circulation as it would include temporary closures of roads, sidewalks, transit stops, and bike lanes. Implementation of Mitigation Measure 3.17-1 would reduce impacts related to the circulation system to less than significant by ensuring that accessibility and connectivity are maintained during construction activities.

**Mitigation Measure 3.17-1: Traffic Control Plan**

*Prior to project construction within or adjacent to public roadways, SMUD's construction contractor shall develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works. The plan shall identify temporary lane, sidewalk, bicycle lane, and transit stop closures and provide information regarding how access and connectivity will be maintained during construction activities. The plan shall include details regarding traffic controls that would be employed, including signage, detours, and flaggers. The traffic control plan shall be implemented by the contractor during construction to allow for the safe passage of vehicles, pedestrians, and cyclists along the project route.*

**1.3.6 Tribal Cultural Resources**

Although there are no known tribal cultural resources within the project alignment, consulting Native American tribes requested to be able to visit the site periodically to evaluate the potential for tribal cultural resources. Mitigation Measure 3.18-1 requires SMUD to invite the tribes to periodically visit and inspect the project alignment and would reduce impacts related to tribal cultural resources to less than significant.

**Mitigation Measure 3.18-1: Periodic Monitoring for Potential Unknown Tribal Cultural Resources**

*SMUD shall periodically invite representatives of interested Native American tribes to inspect the active areas of the project alignment, including any soil piles, trenches, or other disturbed areas. Invitations shall be extended to the tribe at least 24 hours prior to excavation of manholes and would allow for inspection to occur within 7 days of the invitation. In the event that tribal representatives or construction workers find evidence of potential tribal cultural resources, the procedures identified in Mitigation Measure 3.5-1 shall be implemented.*

**1.4 CEQA Determination**

SMUD has determined that although the proposed project could have a significant effect on the environment, a significant effect would not occur with implementation of the aforementioned mitigation measures because the proposed mitigation measures would reduce the effects of any impacts to below the established thresholds of significance. Therefore, SMUD published the Mitigated Negative Declaration on August 7, 2019, and SMUD's Board of Directors will consider adoption of the MND at a board meeting in October 2019.



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## 2 Comments and Responses

### 2.1 Introduction

The Draft IS/MND for the proposed project was circulated for a 30-day public review period (August 7, 2019 to September 6, 2019). During the public comment period, SMUD received six comment letters, including three comment letters from agencies and three from interested members of the public (see Table 2-1)

**Table 2-1: List of Commenters**

Letter Number	Name
1	Judy Connolly August 20, 2019 Public Meeting
2	Sherrie Lowenstein August 20, 2019 Public Meeting
3	Jody Wright August 20-28, 2019 Email
4	Jordan Hensley, Environmental Scientist Central Valley Regional Water Quality Control Board August 22, 2019
5	Alex Fong, Branch Chief California Department of Transportation, Office of Transportation Planning – South September 5, 2019
6	Kevin Hocker, City Urban Forester City of Sacramento, Department of Public Works, Urban Forestry September 9, 2019

### 2.2 Responses to Comments

The comment letters identified above and SMUD's responses to comments are provided on the following pages.

Comment Card

Letter  
1

Customer Name JUDY CONNOLLY  
 Phone (optional) 916 812 6596 Email (optional) jmsieconn@yahoo.com  
 Organization (optional) \_\_\_\_\_  
 Address (optional) 61 Farallon Circle Zip Code (Required) 95831  
 Comment/Question Very impressed that you have  
thought of everything. Let the workers  
know very cold clean water will be  
there for them on our block!  
Merci!

1-1



© SMUD PC-057 3/19 Forms Management

Letter 1	Judy Connolly 8/20/2019
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1-1 The comment expresses satisfaction with SMUD's efforts for the project. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.



Comment Card		Letter 2
Customer Name	Sherrie Lowenstein	
Phone (optional)	(916) 508-0681	Email (optional)
Organization (optional)	slowen7586@gmail.com	
Address (optional)	788 Parklin Ave	Zip Code (Required)
Comment/Question	I just want to know whether the work will directly affect my property - inc. landscaping - This is area #2 P.S. In the future please make the maps more detailed so it is easier to tell if properties will be affected. Thank you	

<b>Letter 2</b>	Sherrie Lowenstein 8/20/2019
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2-1 The comment questions whether the activities in the commenter's neighborhood would directly affect the commenter's landscaping and suggests the use of more detailed maps in the future. The area referenced is not part of the Pocket/Greenhaven 69kV Underground Cable Reliability Project, but rather an area where routine maintenance activities are taking place. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.



Pocket/Greenhaven 69kV Underground Cable Reliability Project  
October 2019

Letter  
3

**From:** Daniel J. Honeyfield  
**To:** Beth Tincher; Jason Casella; Rob Ferrera  
**Cc:** Vadim Balev  
**Subject:** FW: Pocket/Greenhaven Underground Cable Reliability  
**Date:** Wednesday, August 28, 2019 8:18:52 AM

FYI...

Daniel Honeyfield  
Manager, T&D Maintenance Planning  
w.916-732-7285 | c.916-769-5575 | [daniel.honeyfield@smud.org](mailto:daniel.honeyfield@smud.org)

SMUD | Powering forward. Together.  
4401 Bradshaw Road, Mail Stop EA401, Sacramento, CA 95852  
P.O. Box 15830, Sacramento, CA 95852-0830

**From:** Jody Wright <[jdwright@ix.netcom.com](mailto:jdwright@ix.netcom.com)>  
**Sent:** Wednesday, August 28, 2019 6:42 AM  
**To:** Daniel J. Honeyfield <[Daniel.Honeyfield@smud.org](mailto:Daniel.Honeyfield@smud.org)>  
**Subject:** RE: Pocket/Greenhaven Underground Cable Reliability

.....**CAUTION: External email:** To report suspicious emails, click "Report Email" icon in Outlook.  
Mobile users should email [phishing@smud.org](mailto:phishing@smud.org)

Hi Daniel,

Thanks for checking that out. That's reassuring. I think there has been some improvement since the mainline cable was replaced last year. I'm looking forward to further improvement with the replacement of the 69KV cable next year. I appreciate this specific information.

3-1

Thanks, again, for your time.

Jody

**From:** Daniel J. Honeyfield [<mailto:Daniel.Honeyfield@smud.org>]  
**Sent:** Tuesday, August 27, 2019 2:19 PM  
**To:** Jody Wright <[jdwright@ix.netcom.com](mailto:jdwright@ix.netcom.com)>  
**Cc:** Beth Tincher <[beth.tincher@smud.org](mailto:beth.tincher@smud.org)>; Jason Casella <[Jason.Casella@smud.org](mailto:Jason.Casella@smud.org)>; Rob Ferrera <[Rob.Ferrera@smud.org](mailto:Rob.Ferrera@smud.org)>; Vadim Balev <[Vadim.Balev@smud.org](mailto:Vadim.Balev@smud.org)>  
**Subject:** RE: Pocket/Greenhaven Underground Cable Reliability

Hi Jody,

We reviewed your specific outage history dating back to 2015 at your residence on Park River Oak Circle. Most of the outages that you experienced was due to underground cable on the mainline cable (larger distribution cables) and the 69kV cable. The mainline cable was replaced this past May and the 69kV cable is planned to be replaced next year. Some of the other outages include balloons



into lines, animals getting into our equipment, and tree branches landing into our lines.

We have a very thorough cable replacement program, where we monitor all cable outages. Some areas with the same type of equipment can have distinctively different failure modes due to multiple variables. Project 10 is replacing the 69kV cable. This cable failed twice in 2017 and caused outages to almost the entire Pocket area. This project is being implemented due to the number of customers impacted from the past cable failures. Our cable replacement program not only considers the number of customers impacted but also the number of outages due to cable failure.

I hope I have provided some additional clarification.

Please let me know if you have any additional questions.

Thanks,

Daniel

**Daniel Honeyfield**  
*Manager, T&D Maintenance Planning*  
w.916-732-6484 | [daniel.honeyfield@smud.org](mailto:daniel.honeyfield@smud.org)

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P.O. Box 15830, Sacramento, CA 95852-0830

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**From:** Jody Wright <[jdwright@ix.netcom.com](mailto:jdwright@ix.netcom.com)>  
**Sent:** Sunday, August 25, 2019 2:35 PM  
**To:** Daniel J. Honeyfield <[Daniel.Honeyfield@smud.org](mailto:Daniel.Honeyfield@smud.org)>  
**Subject:** RE: Pocket/Greenhaven Underground Cable Reliability

.....**CAUTION: External email:** To report suspicious emails, click "Report Email" icon in Outlook. Mobile users should email [phishing@smud.org](mailto:phishing@smud.org)

Hi Daniel,

Thank you for your rapid and informative response. There is just one point that still doesn't make sense to me. As I mentioned, I lived on Perera Circle for 20 years until 2014. During that two-decade period outages were very rare. Then I moved to the vicinity of Garcia Bend Park. In the past five years I have experienced more outages than I did in the previous 20 years. Perera Circle is very near the Project 10 area. I would have expected many more outages in that location, but that was not the case. Why would there have been fewer outages nearer the Project 10 location than near Garcia Bend Park, relatively much farther away?

3-2

Thanks again for your time and consideration.

Jody Wright



Pocket/Greenhaven 69kV Underground Cable Reliability Project  
October 2019

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**From:** Daniel J. Honeyfield [<mailto:Daniel.Honeyfield@smud.org>]  
**Sent:** Wednesday, August 21, 2019 11:56 AM  
**To:** [jdwright@ix.netcom.com](mailto:jdwright@ix.netcom.com)  
**Cc:** Jason Casella <[Jason.Casella@smud.org](mailto:Jason.Casella@smud.org)>; Beth Tincher <[beth.tincher@smud.org](mailto:beth.tincher@smud.org)>; Rob Ferrara <[Rob.Ferrera@smud.org](mailto:Rob.Ferrera@smud.org)>  
**Subject:** RE: Pocket/Greenhaven Underground Cable Reliability

Hi Judy,

Thank you for bringing this point to our attention. The related map has 13 projects scheduled to have work performed between 2019 and 2020. Project 10 is the focal point of the letter as it is the largest and most significant project.

Much of the cable in the south part of Pocket is newer and has better reliability. Based on our system configuration, cables are connected together in way where a cable failure can impact customers hundreds of feet away. For example, cable failures within projects 1 and 10 have impacted your residence in the past. Replacing those cables will improve your reliability. SMUD will continue to monitor the performance of the south part of Pocket and issue new projects as they meet the criteria for replacement.

Thank you.

**Daniel Honeyfield**  
*Manager, T&D Maintenance Planning*  
w.916-732-6484 | [daniel.honeyfield@smud.org](mailto:daniel.honeyfield@smud.org)

**SMUD** | Powering forward. Together.  
4401 Bradshaw Road, Mail Stop EA401, Sacramento, CA 95852  
P.O. Box 15830, Sacramento, CA 95852-0830

---

**From:** [jdwright@ix.netcom.com](mailto:jdwright@ix.netcom.com) <[jdwright@ix.netcom.com](mailto:jdwright@ix.netcom.com)>  
**Sent:** Tuesday, August 20, 2019 7:00 PM  
**To:** Daniel J. Honeyfield <[Daniel.Honeyfield@smud.org](mailto:Daniel.Honeyfield@smud.org)>  
**Subject:** Pocket/Greenhaven Underground Cable Reliability

.....**CAUTION: External email:** To report suspicious emails, click "Report Email" icon in Outlook. Mobile users should email [phishing@smud.org](mailto:phishing@smud.org)

Mr. Honeyfield,

I'm sorry I missed the meeting about this project tonight. I have a couple of questions:

The related map has an incomplete key. It indicates 13 projects of which the green ones have already been completed. Project 10, the current project, is in purple. What about the blue ones?

3-3

There are no projects indicated for the south Pocket along Pocket Road other than Project 7. In my experience over the past five years, since I moved from the area covered by Project 10 to Pocket Road near Garcia Bend Park, there have been far more outages here. The Pocket/Greenhaven Community Association investigated the problem several years ago, and we were told that the problem was related to cheap cable materials installed originally decades ago and that SMUD was working on replacing them as quickly as possible. Why is the south Pocket not included in this project?

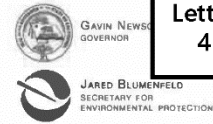
3-3  
 cont.

I hope to hear from you soon. Thank you for your time.

Sincerely,  
 Jody Wright  
 7756 Park River Oak Circle

<b>Letter 3</b>	Jody Wright 8/28/2019
-----------------	--------------------------

- 3-1 The comment thanks SMUD for the information provided in earlier emails. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.
- 3-2 The comment questions why there have been fewer outages nearer the project alignment than near Garcia Bend Park, relatively much farther away. A response to the question was provided in a subsequent email to the commenter from SMUD. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.
- 3-3 The comment questions why the south Pocket area is not included in the project as there have been many outages in the south Pocket area. An email response from SMUD states that much of the cable in the south Pocket area is newer and has better reliability. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.



Letter  
4

Central Valley Regional Water Quality Control Board

22 August 2019

Rob Ferrera  
Sacramento Municipal Utility District (SMUD)  
6201 S Street, MS H201  
Sacramento, CA 95817

**CERTIFIED MAIL**  
7014 2120 0001 4292 4447

**COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, POCKET/GREENHAVEN 69KV UNDERGROUND CABLE RELIABILITY PROJECT, SCH#2019089021, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 7 August 2019 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 Pocket/Greenhaven 69kV Underground Cable Reliability 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.

**I. Regulatory Setting**

**Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)



4-1

Pocket/Greenhaven 69kV Underground - 2 -  
Cable Reliability Project  
Sacramento County

22 August 2019

Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

4-1  
cont.

#### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

4-2

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **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:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

4-3

Pocket/Greenhaven 69kV Underground - 3 -  
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Sacramento County

22 August 2019

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

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:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

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

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

**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. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

**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 (USACE). If a Section 404 permit is required by the USACE, 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 USACE at (916) 557-5250.

4-3  
cont.

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<sup>1</sup> 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.



Pocket/Greenhaven 69kV Underground - 4 -  
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22 August 2019

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE 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 10 of the Rivers and Harbors Act or 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. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may 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 Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:  
[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

4-3  
cont.



Pocket/Greenhaven 69kV Underground - 5 -  
Cable Reliability Project  
Sacramento County

22 August 2019

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

**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:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/regulatory\\_information/for\\_growers/coalition\\_groups/](https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/) or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto: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 11-100 acres are currently \$1,277 + \$8.53/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

4-3  
cont.

**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 *Limited*



Pocket/Greenhaven 69kV Underground - 6 -  
Cable Reliability Project  
Sacramento County

22 August 2019

*Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:  
<https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4812 or [Jordan.Hensley@waterboards.ca.gov](mailto:Jordan.Hensley@waterboards.ca.gov).

Jordan Hensley  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento

4-3  
cont.

Letter 4	<b>Central Valley Regional Water Quality Control Board</b> Jordan Hensley, Environmental Scientist 8/22/2019
----------	--

- 4-1 The comment provides background information about the Basin Plan and the process for amending the Basin Plan. It is understood that the standards of the Basin Plan may be amended over time. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.
- 4-2 The comment states that all wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan.

The Basin Plan is discussed on page 56 of the Draft IS/MND. Furthermore, as discussed on pages 56 and 57 of the Draft IS/MND, the project would comply with the applicable waste discharge requirements for the Municipal Separate Storm Sewer stormwater permit and the Statewide construction general NPDES permit. No changes are required to the Draft IS/MND in response to this comment.

- 4-3 The comment provides information about the permitting requirements that may be applicable to the project. Section 2.3 beginning on page 12 of the Draft IS/MND discusses the potential permits that may be required and includes permits issued by the Central Valley Regional Water Quality Control Board. Additionally, the impact discussion on pages 56 and 57 of the Draft IS/MND discuss the applicable permits and requirements related to water quality. No changes are required to the Draft IS/MND in response to this comment.



Pocket/Greenhaven 69kV Underground Cable Reliability Project  
October 2019

STATE OF CALIFORNIA - CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWS

Letter  
5

DEPARTMENT OF TRANSPORTATION  
DISTRICT 3  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE (530) 634-7616  
FAX (530) 741-4111  
TTY 711  
www.dot.ca.gov/dist3

*Making Conservation  
a California Way of Life.*

September 5, 2019

GTS# 03-SAC-2019-00499  
SCH 2019089020

Rob Ferrera  
Environmental Specialist  
Sacramento Municipal Utility District  
6201 S Street, MS H201  
Sacramento, CA 95817

**Pocket/Greenhaven 69kv Underground Cable Reliability Project – Draft Initial  
Study/Mitigated Negative Declaration (Draft IS/MND)**

Dear Mr. Ferrera:

Thank you for including California Department of Transportation (Caltrans) in the application review for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the state's mobility goals that support a vibrant economy and build communities.

The Sacramento Municipal Utility District (SMUD) proposes to replace approximately 2 miles of existing underground cable and construct up to 15 new manholes in the Pocket/Greenhaven neighborhood of the City of Sacramento. The project alignment begins southeast of the Florin Road interchange on Interstate 5 (I-5) at two riser poles located between I-5 and a drainage canal. The project alignment crosses beneath I-5 and runs in a northwest direction through a parking lot to Florin Road, where it heads west along the southern edge of Florin Road. The alignment continues to Gloria Drive, where it turns left and terminates at the Gloria-Florin distribution substation (approximately 400 feet west of Florin Road). The alignment splits at Havenside Drive and continues south along Havenside Drive until it terminates at the Havenside-Canal distribution substation located immediately west of the Pocket Canal. For the areas beneath I-5 and Pocket Canal, existing underground lines would be removed, and new line installed within conduit. For the remainder of the alignment, the underground cable would be replaced via open trenching. Based on the information provided, Caltrans provides the following comments:

|  
5-1

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

Rob Ferrera  
SMUD  
September 5, 2019  
Page 2

**Right of Way:**

All proposed work within Caltrans' Right of Way (ROW) requires construction plans to be submitted for review and approval. This includes the proposed schedule for construction and all incidental submittals.

5-2

Caltrans also requires an issuance of permit(s) for movement of oversized or excessive loads on State Highways. Permit information for truck routes for the Sacramento region can be obtained by calling 916-322-129.

**Traffic Operations:**

1. Appendix B of the Draft IS/MND shows 132 days for the number of working days. Please provide the total number of working days, number of seasons, start and finish dates, number of shifts, number of employees in each shift, and hours of operation to determine the number of trips generated and their pattern.
2. In the Draft IS/MND on Page 9, Section 2.2, second paragraph, it states that, "...it is unknown whether the cable beneath I-5 is encased in conduit or direct buried. If the cable is within conduit, it will be replaced by pulling through the conduit. If the existing cable is direct-buried, the project would include installation of conduit and new cable beneath I-5 or a new overhead crossing over I-5." If SMUD decides to install a conduit and cable beneath I-5, please clarify how this will affect the project schedule and operational impacts to I-5. We will need to be informed if SMUD will require any lane closures on our SHS.
3. In the Draft IS/MND on Page 74, Section 3.17.2, Item 3.17-1: It states that "Prior to project construction within or adjacent to public roadways, SMUD's construction contractor shall develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works." Caltrans will need to be included in this discussion and, as part of the traffic control plan, we request it to show all detours, closures or restrictions to any State facilities (i.e. ramps, if any) due to the proposed construction work related to the installation of the conduit, and truck routes with the number of projected trips, time of day, and type of trucks per route.

5-3

5-4

5-5

**Encroachment Permit/Maintenance:**

An encroachment permit will be required from Caltrans for any work performed on the State ROW, if not previously obtained. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to:

5-6

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*



Rob Ferrera  
SMUD  
September 5, 2019  
Page 3

Hikmat Bsaibess  
California Department of Transportation  
District 3, Office of Permits  
703 B Street  
Marysville, CA 95901

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 Uzma Rehman, Intergovernmental Review Coordinator for the City of Sacramento, by phone (530) 741-5173 or via email to [uzma.rehman@dot.ca.gov](mailto:uzma.rehman@dot.ca.gov).

Sincerely,

ALEX FONG, Branch Chief  
Office of Transportation Planning – South

5-6  
cont.

Letter 5	<b>California Department of Transportation, Office of Transportation Planning - South</b> Alex Fong, Branch Chief 9/5/2019
----------	--

5-1 The comment introduces California Department of Transportation's (Caltrans') interest in the project and provides a summary of the project description. The comment does not address the adequacy of the analysis of the Draft IS/MND. No further response is needed.

5-2 The comment states that all proposed work with Caltrans's right-of-way is subject to review and approval by Caltrans. The comment also notes that oversize or excessive loads may require permits issued by Caltrans. As noted in Section 2.3 (page 12) of the Draft IS/MND, SMUD acknowledges that permits issued by Caltrans may be required.

5-3 The comment requests detailed construction information, including the total number of working days, number of seasons, start and finish dates, number of shifts, number of employees in each shift, and hours of operation.

As noted in Section 2.2 (page 12) of the Draft IS/MND, construction activities could begin as early as November 2019 and, although construction activities may not be continuous, construction is anticipated to take approximately 8 months with completion by the end of 2020. At this time, the precise timing and details of construction activities around I-5 are not yet known, would be subject to site-specific conditions and are not required to ensure a proper analysis of potential environmental impacts under CEQA. More details will be developed once the project contractor has been selected. The Draft IS/MND presents a reasonably conservative analysis of the potential conditions that may occur as a result of construction activities associated with the project. As further construction details are developed, SMUD will contact Caltrans regarding any potential need for encroachment permits or permits from Caltrans.

5-4 The comment requests clarification about schedule impacts should the existing cable beneath I-5 not be encased in conduit. As discussed in Response to Comment 5-3, the exact schedule is not yet known but it is anticipated that construction activities would take approximately 8 months and conclude by the end of 2020. If it is determined that the existing underground freeway crossing cannot be re-used, SMUD will design a new underground or overhead crossing and submit for permit with Caltrans. No lane closures are anticipated for a new underground crossing. Further, the length of the construction period is not anticipated to be substantially affected in the event that the installation of additional conduit is required. However, in the event that any lane closures or amendments to permits associated with the project are required, SMUD would coordinate with the appropriate permitting agencies, including Caltrans.



- 5-5 The comment states that Caltrans needs to be included in discussions regarding a traffic control plan. The comment also requests that the traffic control plan show all detours, closures or restrictions to any State facilities (i.e., ramps, if any) due to the proposed construction work related to the installation of the conduit, and truck routes with the number of projected trips, time of day, and type of trucks per route. As part of the encroachment permit application process, SMUD will submit the traffic control plan and construction drawings to Caltrans for review.
- 5-6 The comment provides information regarding required submittals for an encroachment permit. Section 2.3 beginning on page 12 of the Draft IS/MND discusses the potential permits that may be required and includes permits issued by the Caltrans. No changes are required to the Draft IS/MND in response to this comment.



Pocket/Greenhaven 69kV Underground Cable Reliability Project  
October 2019

**From:** Kevin A. Hocker <KHocker@cityofsacramento.org>  
**Sent:** Monday, September 9, 2019 11:33 AM  
**To:** Jodi Carlson <JCarlson@cityofsacramento.org>  
**Subject:** RE: SMUD CEQA Notice - Pocket/Greenhaven Underground Cable Reliability

Letter  
6

Hi Jodi,

I wasn't sure how best to make my comments so I copied the relevant text from page 32 of the document and provided my suggested edits in this email. Suggested deletions have strikethrough texts and suggested additions are in red text. I have essentially removed the language that characterizes SMUD as being exempt from the tree ordinance and I have asked SMUD to estimate the number of trees that will be removed as part of this project.

Section 12.56.080(E) of the Sacramento City Code requires that before a public utility installs or performs maintenance on infrastructure that may cause injury to a city tree or private protected tree, the utility shall submit a plan for review and approval by the City's Public Works Director. While this provision essentially exempts SMUD from the City's tree ordinance, SMUD prefers to will coordinate with the City by providing tree work plans to the City that may be approved via email for approval prior to beginning any work in the vicinity of any city tree or private protected tree. Because the project would require the removal of approximately ## city and/or protected private trees, this impact is potentially significant.

**Mitigation Measure 3.4-2: Consistency with City of Sacramento Tree Ordinance**

*While SMUD is exempt from the City's tree ordinance, SMUD shall provide to the City a plan for all tree work for approval. A certified arborist shall approve review all work plans prior to submittal to the City. Tree planting will comply with the City's landscaping requirements (Sacramento City Code Sections 17.612.010 and 17.612.040).*

*Protective fencing with tree protection signs will be erected around all trees (or tree groups) to be preserved during construction activities. The protective fence will be installed at the limits of the tree protection zone, usually the dripline of the tree or as defined by the project arborist or biologist. This will delineate the tree protection area and prevent unwanted activity in and around the trees and will reduce soil compaction in the root zones of the trees and other damage from heavy equipment. SMUD's construction contractor shall maintain the fence to keep it upright, taut, and aligned at all times. Fencing will be*

6-1

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*removed only after all construction activities near the trees are complete. Canopy or root pruning of any retained protected trees to accommodate construction and/or fire lane access will conform to the techniques and standards in the current edition of ANSI A300 (Tree, Shrub and Other Woody Plant Maintenance—Standard Practices) or International Society of Arboriculture Best Management Practices.*

Implementation of Mitigation Measure 3.4-2 would minimize impacts to city and protected trees by requiring SMUD to submit a plan for work affecting city and protected trees for review and approval by the director of the department of public works. With implementation of this mitigation measure, potential impacts to city and protected trees would be reduced to a **less than significant** level.

6-1  
cont.

Thanks,

Kevin A. Hocker  
B.Sc., Environmental Horticulture and Urban Forestry (UCDavis)  
Board Certified Master Arborist WE-8039BM (ISA)  
City Urban Forester  
Department of Public Works, Urban Forestry  
(916)-808-4996

<p><b>Letter 6</b></p>	<p><b>City of Sacramento, Department of Public Works, Urban Forestry</b> Kevin Hocker, City Urban Forester 9/9/2019</p>
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- 6-1 The comment provides suggested revisions to the analysis and mitigation related to the Draft IS/MND’s discussion of the City of Sacramento’s tree ordinance. In response to this comment, the text beginning on page 32 of the Draft IS/MND has been amended to state:

**Less than Significant with Mitigation Incorporation.** The project alignment is located primarily within the rights-of-way of I-5, city streets, sidewalks, and landscaped vegetation. Where activities would take place adjacent to the street, and within the right of way of I-5, trees may need to be removed.

Section 12.56.080(E) of the Sacramento City Code requires that before a public utility installs or performs maintenance on infrastructure that may cause injury to a city tree or private protected tree, the utility shall submit a plan for review and approval by the City’s Public Works Director. ~~While this provision essentially exempts SMUD from the City’s tree ordinance, SMUD prefers to will coordinate with the City by providing tree work plans to the City that may be approved via email any work in the vicinity of any city tree or private protected tree. Because SMUD will comply with Section 12.56.080(E), this impact would be less than significant and no mitigation is~~

~~required. Because the project would require the removal of city and/or protected private trees, this impact is potentially significant.~~

***Mitigation Measure 3.4-2: Consistency with City of Sacramento Tree Ordinance***

~~While SMUD is exempt from the City's tree ordinance, SMUD shall provide to the City a plan for all tree work. A certified arborist shall approve all work plans prior to submittal to the City. Tree planting will comply with the City's landscaping requirements (Sacramento City Code Sections 17.612.010 and 17.612.040).~~

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~~Implementation of Mitigation Measure 3.4-2 would minimize impacts to city and protected trees by requiring SMUD to submit a plan for work affecting city and protected trees for review and approval by the director of the department of public works. With implementation of this mitigation measure, potential impacts to city and protected trees would be reduced to a **less than significant** level.~~

### 3 Changes to Draft IS/MND Text

This section presents specific text changes made to the Draft IS/MND since its publication and public review. The changes are presented in the order in which they appear in the original document and are identified by the Draft IS/MND page number. Text deletions are shown in strikethrough (~~strikethrough~~), and text additions are shown in underline (underline).

It should be noted that the following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the Draft IS/MND and do not necessitate recirculation of the Draft IS/MND or preparation of an Environmental Impact Report.

#### 3.1 Changes to Draft IS/MND Text

The checklist on page 27 of the Draft IS/MND is revised as follows:

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>IV. Biological Resources.</b>				
<b>Would the project:</b>				
a) 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The text beginning on page 32 of the Draft IS/MND is revised as follows.

**Less than Significant with Mitigation Incorporation.** The project alignment is located primarily within the rights-of-way of I-5, city streets, sidewalks, and landscaped vegetation. Where activities would take place adjacent to the street, and within the right of way of I-5, trees may need to be removed.

Section 12.56.080(E) of the Sacramento City Code requires that before a public utility installs or performs maintenance on infrastructure that may cause injury to a city tree or private protected tree, the utility shall submit a plan for review and approval by the City's Public Works Director. ~~While this provision essentially exempts SMUD from the City's tree ordinance, SMUD prefers to will~~ coordinate with the City by providing tree work plans to the City ~~that may be approved via email~~ for any work in the vicinity of any city tree or private protected tree. Because SMUD will comply with Section 12.56.080(E), this impact would be less than significant and no mitigation is required. ~~Because the project would require the removal of city and/or protected private trees, this impact is potentially significant.~~

***Mitigation Measure 3.4-2: Consistency with City of Sacramento Tree Ordinance***

~~While SMUD is exempt from the City's tree ordinance, SMUD shall provide to the City a plan for all tree work. A certified arborist shall approve all work plans prior to submittal to the City. Tree planting will comply with the City's landscaping requirements (Sacramento City Code Sections 17.612.010 and 17.612.040).~~

~~Protective fencing with tree protection signs will be erected around all trees (or tree groups) to be preserved during construction activities. The protective fence will be installed at the limits of the tree protection zone, usually the dripline of the tree or as defined by the project arborist or biologist. This will delineate the tree protection area and prevent unwanted activity in and around the trees and will reduce soil compaction in the root zones of the trees and other damage from heavy equipment. SMUD's construction contractor shall maintain the fence to keep it upright, taut, and aligned at all times. Fencing will be removed only after all construction activities near the trees are complete. Canopy or root pruning of any retained protected trees to accommodate construction and/or fire lane access will conform to the techniques and standards in the current edition of ANSI A300 (Tree, Shrub and Other Woody Plant Maintenance—Standard Practices) or International Society of Arboriculture Best Management Practices.~~

~~Implementation of Mitigation Measure 3.4-2 would minimize impacts to city and protected trees by requiring SMUD to submit a plan for work affecting city and protected trees for review and approval by the director of the department of public works. With implementation of this mitigation measure, potential impacts to city and protected trees would be reduced to a **less than significant** level.~~

## **4 MITIGATION MONITORING AND REPORTING PROGRAM**

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### **4.1 Introduction**

This mitigation monitoring and reporting program summarizes identified mitigation measures, implementation schedule, and responsible parties for the SMUD Pocket/Greenhaven 69kV Underground Cable Reliability Project(project). SMUD will use this mitigation monitoring and reporting program to ensure that identified mitigation measures, adopted as conditions of project approval, are implemented appropriately. This monitoring program meets the requirements of CEQA Guidelines Section 15074(d), which mandates preparation of monitoring provisions for the implementation of mitigation assigned as part of project approval or adoption.

### **4.2 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 mitigation plan and other permit conditions imposed by participating regulatory agencies.

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

SMUD and its appointed contractor will also be responsible for ensuring that its construction personnel understand their responsibilities for adhering to the performance requirements of the mitigation plan and other contractual requirements related to the implementation of mitigation as part of Project construction. In addition to the prescribed mitigation measures, Table 4-1 (Mitigation Monitoring and Reporting Program) lists each identified environmental resource being affected, the corresponding monitoring and reporting requirement, and the party responsible for ensuring implementation of the mitigation measure and monitoring effort.

### **4.3 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.



<b>Table 4-1: Mitigation Monitoring and Reporting Program</b>			
<b>Checklist Section</b>	<b>Environmental Criteria</b>	<b>Mitigation Measure</b>	<b>Timing</b>
Air Quality	a, b	<p><b>Mitigation Measure 3.3-1: Implement SMAQMD Basic Construction Emission Control Practices.</b></p> <p><i>During construction, the contractor shall comply with and implement SMAQMD’s Basic Construction Emission Control Practices, which includes SMAQMD-recommended BMPs and BACT, for controlling fugitive dust emissions. Measures to be implemented during construction include the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Water all exposed surfaces at least two times daily. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads.</i></li> <li>• <i>Cover or maintain at least two (2) feet of freeboard space on haul trucks transporting soil, sand, or other loose material on the site. Cover any haul trucks that will be traveling along freeways or major roadways.</i></li> <li>• <i>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 power sweeping is prohibited.</i></li> <li>• <i>Limit vehicle speed on unpaved roads to 15 miles per hour.</i></li> <li>• <i>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.</i></li> </ul>	Throughout construction activities

Table 4-1: Mitigation Monitoring and Reporting Program			
Checklist Section	Environmental Criteria	Mitigation Measure	Timing
		<ul style="list-style-type: none"> <li>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][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.</li> <li>Maintain all construction equipment in proper working condition according to manufacturer's specifications. Equipment will be checked by a certified mechanic and determined to be running in proper condition before it is operated.</li> </ul>	
Biological Resources	a	<p><b>Mitigation Measure 3.4-1: Avoid disturbance of nesting birds</b></p> <p><i>If construction will occur during the nesting season, a SMUD project biologist/biological monitor will conduct pre-construction nesting bird surveys to determine if birds are nesting in the work area.</i></p> <p><i>The pre-construction nesting bird surveys will identify on-site bird species and any nest-building behavior. If no nesting birds are found in or within 500 feet of the project alignment during the pre-construction clearance surveys, construction activities may proceed as scheduled.</i></p> <p><i>If pre-nesting behavior is observed, but an active nest has not yet been established (e.g., courtship displays, but no eggs in a constructed nest), a nesting bird deterrence and removal program will be implemented. Such deterrence methods include removal of previous year's nesting materials and removal of partially completed</i></p>	Prior to construction activities.

Table 4-1: Mitigation Monitoring and Reporting Program			
Checklist Section	Environmental Criteria	Mitigation Measure	Timing
		<p><i>nests in progress. Once a nest is situated and identified with eggs or young, it is considered to be “active” and the nest cannot be removed until the young have fledged.</i></p> <p><i>Because bird species may breed multiple times in a season, monitoring for nesting birds will continue during the nesting season to address new arrivals. A qualified biologist will conduct bi-weekly nesting bird surveys of suitable nesting habitat in the construction area during the nesting season and deter establishment of nests by removing partial completed nests.</i></p> <p><i>If an active nest is found in or within 500 feet of the project alignment during construction, a “No Construction” buffer zone will be established around the active nest (usually a minimum radius of 50 feet for passerine birds and 500 feet for raptors) to minimize the potential for disturbance of the nesting activity. The project biologist/biological monitor will determine and flag the appropriate buffer size required, based on the species, specific situation, tolerances of the species, and the nest location. Project activities will resume in the buffer area when the project biologist/biological monitor has determined that the nest(s) is (are) no longer active or the biologist has determined that with implementation of an appropriate buffer, work activities would not disturb the birds nesting behavior.</i></p> <p><i>If special-status bird species are found nesting in or within 500 feet of the project alignment, the project biologist/biological monitor shall notify SMUD’s project manager to notify CDFW or USFWS, as appropriate, within 24 hours of first nesting observation.</i></p>	

<b>Table 4-1: Mitigation Monitoring and Reporting Program</b>			
<b>Checklist Section</b>	<b>Environmental Criteria</b>	<b>Mitigation Measure</b>	<b>Timing</b>
Cultural Resources	a, b	<p><b>Mitigation Measure 3.5-1: Worker awareness and response for cultural and tribal cultural resources</b></p> <p><i>Prior to the start of construction, SMUD shall provide information to the construction contractor and SMUD’s project superintendent regarding the potential for cultural and tribal cultural resources that could be encountered during ground disturbance, the regulatory protections afforded to such finds, and the procedures to follow in the event of discovery of a previously unknown resource, including notifying SMUD representatives.</i></p> <p><i>If workers observe any evidence of prehistoric, historic, paleontological, or tribal cultural resources (e.g., freshwater shells, beads, bone tool remnants, bones, stone tools, grinding rocks, foundations or walls, structures, refuse deposits, or fossils), all work within 50 feet of the find shall cease immediately and SMUD representatives shall be notified. An archaeologist meeting the Secretary of the Interior’s required qualifications or a paleontologist meeting the Society of Vertebrate Paleontology’s minimum qualifications shall be consulted to assess the significance of the cultural or paleontological find and recommend appropriate measure for the treatment of the resource. Potential treatment may include no action (i.e., the resource is not significant), avoidance of the resource, or data recovery. If the resource may be of Native American origin, SMUD shall consult with the tribes to whom the resource could have importance.</i></p>	Throughout construction activities.

<b>Table 4-1: Mitigation Monitoring and Reporting Program</b>			
<b>Checklist Section</b>	<b>Environmental Criteria</b>	<b>Mitigation Measure</b>	<b>Timing</b>
Cultural Resources	c	<p><b>Mitigation Measure 3.5-2: Halt ground disturbance upon discovery of human remains</b></p> <p><i>If human remains are discovered during any project activities, potentially damaging ground disturbing activities within 100 feet of the remains shall be halted immediately, and SMUD shall notify the Sacramento County coroner and the NAHC immediately, as required by Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.05. If the remains are determined by NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. SMUD shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. Following the coroner's and NAHC's findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.</i></p>	Throughout construction activities.

<b>Table 4-1: Mitigation Monitoring and Reporting Program</b>			
<b>Checklist Section</b>	<b>Environmental Criteria</b>	<b>Mitigation Measure</b>	<b>Timing</b>
Traffic and Transportation	a, c, d	<p><b>Mitigation Measure 3.17-1: Traffic Control Plan</b></p> <p><i>Prior to project construction within or adjacent to public roadways, SMUD's construction contractor shall develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works. The plan shall identify temporary lane, sidewalk, bicycle lane, and transit stop closures and provide information regarding how access and connectivity will be maintained during construction activities. The plan shall include details regarding traffic controls that would be employed, including signage, detours, and flaggers. The traffic control plan shall be implemented by the contractor during construction to allow for the safe passage of vehicles, pedestrians, and cyclists along the project route.</i></p>	Prior to work within or adjacent to public roadways.
Tribal Cultural Resources	a, b	<p><b>Mitigation Measure 3.18-1: Periodic Monitoring for Potential Unknown Tribal Cultural Resources</b></p> <p><i>SMUD shall periodically invite representatives of interested Native American tribes to inspect the active areas of the project alignment, including any soil piles, trenches, or other disturbed areas. Invitations shall be extended to the tribe at least 24 hours prior to excavation of manholes and would allow for inspection to occur within 7 days of the invitation. In the event that tribal representatives or construction workers find evidence of potential tribal cultural resources, the procedures identified in Mitigation Measure 3.5-1 shall be implemented.</i></p>	Throughout construction activities.



## 5 LIST OF PREPARERS

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### 5.1 Sacramento Municipal Utility District

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### 5.2 Ascent Environmental

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Michele Mattei.....Document Specialist



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