

Appendix INT-1

**Notice of Preparation (NOP) and
NOP Comments**



COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
NOTICE OF PREPARATION

AUGUST 17, 2023

TO: ALL INTERESTED PARTIES

Subject: Notice of Preparation of a Draft Environmental Impact Report for Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project (PLER2023-00069)

Sacramento County will be the CEQA Lead Agency for preparation of a Supplemental Environmental Impact Report (SEIR) to the 2021 Sacramento International Airport Master Plan Update SEIR for the WattEV Innovative Freight Terminal (SWIFT) project. This Notice of Preparation has been sent to responsible and trustee agencies and involved federal agencies pursuant to Section 15082 of the CEQA Guidelines. Agencies should comment on the scope and content of the environmental information that is germane to the agencies' statutory responsibilities in connection with the proposed project. Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than 30 days after issuance of this notice.

The project description, location, and the probable environmental effects are contained in the attached materials and may also be viewed online at:

<https://planningdocuments.saccounty.net/ViewProjectDetails.aspx?ControlNum=PLER2023-00069>

Please send your Agency's response to this Notice to:

Julie Newton, Environmental Coordinator
Planning and Environmental Review
827 7th Street, Room 225, Sacramento, CA 95814

or via e-mail at: CEQA@saccounty.gov.

Your response should include the name of a contact person in your agency.

Agencies with specific questions about the project should contact Alison Little, Associate Planner, at (916) 874-8620 for further information.

COMMENT PERIOD

August 17, 2023 to September 15, 2023

SCOPING MEETINGS:

One scoping meeting has been scheduled for the proposed project. Interested parties and agency representatives are invited to learn more about the proposed project and submit comments and suggestions concerning the analysis in the SEIR.

The scoping meeting will be conducted virtually via Zoom. The date, time, and login information for the meeting is as follows:

August 30, 2023, 2:00 PM

Location: Online via Zoom at <https://saccounty-net.zoomgov.com/j/1607123468?pwd=TWdxZXZLRldCTjdiRHlKcW5jR0hXUT09>

Meeting ID: 160 712 3468

Passcode: 189720

PROJECT TITLE:

Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project

CONTROL Number:

PLER2023-00069

PROJECT PROPONENT(S):

Owner: Sacramento County Department of Airports
Attn: Glen Rickelton

Applicant: WattEV, Inc
Attn: Emil Youssefzadeh

Engineer: Kimley Horn and Associates, Inc.
Attn: Zach Tait

PROJECT DESCRIPTION AND LOCATION:

The Sacramento County Department of Airports has formed a public/private partnership with WattEV to construct, own, operate, and cost share the Sacramento County WattEV Innovative Freight Terminal (SWIFT) project, located within the Sacramento International Airport Master Plan area in the northwest portion of Sacramento County, approximately 7.5 miles from downtown Sacramento (see **Plate NOP-1**). Specifically, the project is located south of Interstate 5 (I-5) and immediately south of Sacramento International Airport (see **Plate NOP-2**). The project would provide a publicly accessible Electric Vehicle (EV) charging facility that would be built on a 118-acre parcel of land along a major freight corridor. Facility development would include the installation of Direct Current Fast Chargers (DCFC) and Megawatt Chargers powered by a new solar array that would support charging for shippers and transporters as well as public transportation and passenger vehicles. In addition, the project would include accessory structures which are discussed further below. The project site generally covers APNs 225-0010-003, 225-0010-035, 225-0010-036, and 225-0010-006.

PROJECT FACILITIES

The proposed project includes deployment of advanced high-powered public charging stations and associated facilities powered by a 12.5 megawatt alternating current (MWac) solar generation field, with nameplate power of 31.2 megawatts of direct current (MWdc), to support zero-electric freight movement in Sacramento. The charging areas and associated support facilities would occupy approximately 24 acres of land on the northern portion of the project site while the remaining 94 acres of the site would be occupied by solar fields (See **Plate NOP-3**).

The project site would be configured with two truck charging areas separated by a publicly accessible central plaza. The truck charging areas would include six 3,600-kilowatt (kW) charger configurations. Each configuration would consist of three Megawatt Charging Standard (MCS) 1,200 kW chargers and fifteen 240 kW Combined Charging Standard (CCS) chargers, for a total of 18 MCS chargers and 90 CCS chargers designed for heavy and medium duty (MHD) trucks. The truck charging pads are expected to cover 7.8 acres. In addition to the charging pads, a parking lot for trailers would be provided with an average of 53 parking stalls spread over 2.8 acres of land. The proposed project would also include the installation of 30 CCS chargers dedicated for passenger vehicles, which would be located at the central plaza.

Three buildings would be included within the public plaza. The first building would include offices housing operations staff, a trucker refreshment area, trucker restrooms, and a resting lounge. It would consist of a single story and have a footprint of approximately 2,700 square feet. The second building would include a convenience store, food outlets, restrooms, and a resting lounge for the public. It would also consist of a single story and have a footprint of approximately 7,000 square feet. The third building would contain two stories and be designated as a public visitor center, providing information about California's progress and milestones towards clean air initiatives and emission reduction. The footprint of the public plaza would be approximately 5.25 acres.

Site Access

Access to the project site would be provided along Bayou Way, which borders the site to the north and is parallel to I-5, via Airport Boulevard and its nearby interchange with I-5. Direct access to the project site would be provided by three sets of ingress and egress points (six total access points) along Bayou Way. Two sets of ingress and egress points would serve the truck charging areas while the third set of ingress and egress points would serve the public plaza.

Offsite Improvements

Development of the project would include improvements to portions of Bayou Way to facilitate increased volumes of truck and passenger car traffic. This could include widening of the roadbed and shoulders in some locations. Furthermore, improvements to the interchange of Airport Boulevard and I-5 may be required. The extent of these improvements is still under development.

Construction

The proposed project would be constructed in two phases. Phase 1 would consist of installation of the truck charging areas and public plaza as described above, as well as a 12.5 MWac solar photovoltaic (PV) system with nameplate power of 15.6 MW (50 percent of the final solar array power). Phase 2 would consist of the installation of the remaining 15.6 MW of solar power for a total nameplate of 31.2 MW.

The proposed project would include construction of a customer-owned substation in coordination with SMUD. The provision of the substation would allow the proposed project to export excess generation during peak generation and import power during peak charging sessions. The substation would include medium voltage transformers, switchgears, surge protection, metering equipment, communication equipment, equipment pads, grounding equipment, steel structures, all enclosed by fencing. Outside the substation, sub-transmission poles would provide support for wire entrances, distribution voltage would leave the substation in either overhead or underground configurations and connect to an existing SMUD 69kV overhead transmission line that runs parallel to Power Line Road, about 600 feet east of the project site. Phase 1 of the substation would be sized for 21.6 MW of charging and 12.5 MWac. The substation and switchgear would provide physical space for additional transformer and breakers respectively for Phase 2.

PROJECT OBJECTIVES:

The primary objectives of the proposed project include:

1. Provide a charging facility for electric mobility and freight in the Sacramento area.
2. Provide green energy onsite to support a large part of the need for EV charging.
3. Reduce the freight emissions in the Sacramento region.
4. Contribute to the economic development of the region.
5. Create equitable access to zero emission technology for small carriers and independent owner operators.

ENVIRONMENTAL/LAND USE SETTING:

The site is characterized by vacant land zoned as agricultural by the County. The site is surrounded by other agricultural uses as well as the Metro Air Park Special Planning Area to the northeast. The project site is owned by the Sacramento County Department of Airports and is designated for commercial development under the Sacramento International Airport Master Plan, which was last updated in 2021.

PROBABLE ENVIRONMENTAL EFFECTS/SEIR FOCUS:

The long-range development of the Sacramento International Airport was considered in a Master Plan and EIR that was adopted in 2007 and was most recently updated in 2021 with a Master Plan Update and SEIR. The project site was included in the program-level analysis of both EIRs. As such, the analysis in the current SEIR effort will tier from those previous efforts and will focus on those issues that could result in impacts that would be greater than

previously determined. The SEIR will also consider project-specific impacts that were not evaluated in detail in the previous program EIRs. Those issues that were adequately assessed in the 2021 SEIR or for which resources are not present will be scoped out of the current SEIR, and a rationale for their exclusion will be provided in the SEIR. Those issues have been preliminarily identified for exclusion include geology and soils, mineral resources, and wildfire. Other topics that do not require detailed analysis may be similarly dismissed or scaled back as the analysis progresses. In all cases, a rationale will be provided in the SEIR as to why they were not subjected to a more detailed analysis.

Issues that are expected to be analyzed in the SEIR are listed below. These descriptions are not exhaustive, and other sections and discussions may be included if further research or public comment indicates that their inclusion is warranted. As the analyses progress and the extent of impacts to the categories is determined, appropriate CEQA alternatives will be included for analysis.

Agricultural Resources

The project site is in an area that has been identified as containing Farmland of Local Importance. As a result, impacts to farmland will be identified and analyzed.

Air Quality and Greenhouse Gas Emissions

The SEIR will consider the project's air quality and greenhouse gas emissions effects arising during construction and operation.

Biological Resources

The proposed project has the potential to affect key species in the Natomas Basin, as well as wetlands and jurisdictional waters. Therefore, impacts to these resources will be identified and analyzed.

Cultural and Tribal Resources

The project site will be evaluated for presence of cultural resources, and area tribes will be consulted in accordance with State law and County policy. Impacts to identified resources, if any, will be assessed.

Hazards and Hazardous Materials

The project site is currently used for agricultural operations, and the presence of hazardous materials associated with those or other activities will be evaluated. Impacts related to airport hazards and other potentially hazardous conditions will also be assessed.

Hydrology and Drainage

The drainage patterns in the Natomas Basin have been engineered over decades, and include levees, ditches, canals, and large areas of flooded irrigation. Maintaining and/or reconstructing these features and providing flood protection will be a key environmental

consideration for the project. For this reason, impacts with respect to hydrology and drainage will be identified and analyzed.

Land Use and Planning

The County's General Plan contains several critically important policies that have a direct bearing on development in the Natomas Basin. Among these are policies related to agricultural resources, water supply, biological resources, public facilities, and land use. Many of these policies influence the way environmental impacts are identified and mitigated. Collectively, these policies establish a complex framework of required findings to be met prior to the County's action to approve the project. As a result, an evaluation of the proposed project's compliance with the requirements of these policies will be performed.

Transportation

The project's effects on vehicle miles traveled will be assessed, as well as impacts related to emergency access and hazardous traffic conditions will also be evaluated.

Utilities and Water Supply

Determining the project's requirements for both wet and dry utilities will be a significant factor in how the project can be developed. Water supply has been a notable consideration for area projects, including both the potential effects of groundwater withdrawals and/or surface water diversions. Therefore, impacts with respect to utilities and water supply will be identified and analyzed.

INTENDED USES OF THE SEIR:

The Sacramento County Board of Supervisors will use the information contained in the SEIR in evaluating the proposed project and rendering a decision to approve or deny the requested entitlements. The SEIR will serve as an informational document for the general public as well. Responsible agencies may also use the SEIR as needed for subsequent discretionary actions. Responsible agencies may include but not be limited to the following:

- U.S. Fish and Wildlife Service
- California Department of Fish and Game
- California Transportation Commission
- Regional Water Quality Control Board – Central Valley Region
- Sacramento Area Flood Control Agency (SAFCA)
- Sacramento County Water Agency (SCWA)
- Sacramento Municipal Utilities District (SMUD)



Path: U:\GIS\GIS\Projects\2022\200655\03_WattEV_Innovative\03_Projects\Fig_NOP-1_Regional_Location.mxd_R\raiel 8/6/2023

SOURCE: ESA, 2023; ESRI Imagery

WattEV Innovative Freight Terminal (SWIFT) Project

Plate NOP-1
Regional Location

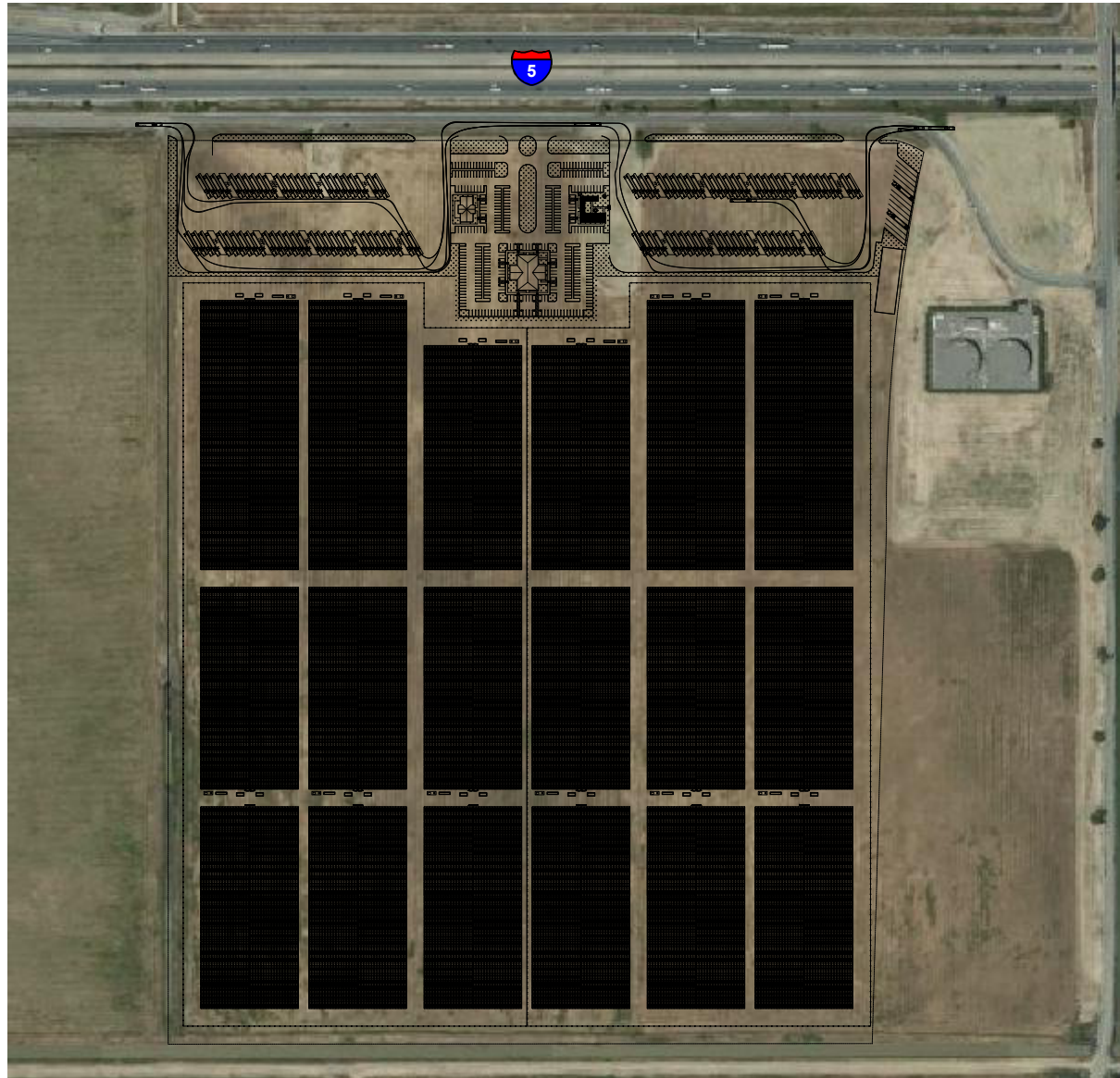


SOURCE: ESA, 2023; ESRI Imagery

WattEV Innovative Freight Terminal (SWIFT) Project

Plate NOP-2
Project Vicinity

20221020200555.03 - WattEV Innovative Freight Terminal (SWIFT) Project EIR/05 Graphics-GIS-Modeling/Illustrator



SOURCE: WattEV, 2023

WattEV Innovative Freight Terminal (SWIFT) Project



Plate NOP-3
Project Site Plan



ECOS
ENVIRONMENTAL
COUNCIL
OF SACRAMENTO

PO Box 1526 ☐ Sacramento, CA 95812
(916) 444-0022



8867 Bluff Lane, Fair Oaks CA
95628 916 769 2857



**SIERRA
CLUB**

909 12th St., Sacramento CA
95814



SACRAMENTO
AUDUBON SOCIETY
P.O. Box 160694
Sacramento, CA 95816-0694

September 12, 2023

Julie Newton, Environmental Coordinator
Planning and Environmental Review
Via email at CEQA@saccounty.gov

Re: Response to County NOP for Sacramento County SWIFT (PLER.2023-00069)

Dear Ms Newton:

We represent the environmental community of Sacramento. We have reviewed the Notice of Preparation for a Supplemental Environmental Impact Report to the 2021 Sacramento International Airport Master Plan Update to include the SWIFT project. Our contact person will be Alexandra Reagan, office@ecosacramento.net. Please keep us informed of any public documents and hearings for this project by noticing the following email chain: office@ecosacramento.net, sacaudubonpresident@gmail.com, sierraclubsacramento@gmail.com, friendsoftheswainsonshawk@gmail.com.

Consideration of Alternative Locations

The SEIR should consider alternative locations for this facility. Both Metro AirPark and Sutter County's planned development in the Natomas Basin provide alternative locations in close proximity that already are permitted by US Fish and Wildlife and California Department of Fish and Game for development. The environmental impacts at these alternative locations would be dramatically less.

Urban Services Boundary

Please explain in the DSEIR when and how the Urban Services Boundary was established on airport property south of I-5 on agricultural land. If made after Plan adoption in 1993, please provide the findings and vote by the Board of Supervisors approving the change.

Conflict with Natomas Basin Habitat Conservation Plan

We have also reviewed the FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR SACRAMENTO INTERNATIONAL AIRPORT MASTER PLAN UPDATE (CONTROL NUMBER: PLER2020-00037) which the current SEIR would modify. In the Executive Summary, this claim is made:

"Conflict with the Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other Approved Local, Regional, or State Habitat Conservation Plan.

The project area is located within the boundary of the Natomas Basin and adjacent to the Metro Air Park Habitat Conservation Plans, but the County is not a participating partner. The project will not impede the ability of the HCP's to be implemented."

The Natomas Basin Habitat Conservation Plan is a basin-wide HCP and the project impacts on the Plan's conservation strategy and the Natomas Basin Conservancy, as well as other conserved mitigation lands in the Basin, must be analyzed consistent with CEQA guidelines. The following NBHCP map shows the HCP covers the airport agricultural lands outside the airport operations area. While the County has not agreed to be a participant in the Plan, the Plan nonetheless exists as an approved habitat conservation plan and CEQA requires analysis of project impacts on the Plan.

To be consistent with the NBHCP, the SEIR must include the following requirement.

Regarding further development in the Natomas Basin outside the NBHCP permit areas, the plan says: "Any additional urban development within the Natomas Basin that occurs outside of the City's and Sutter's Permit Areas, with the exception of the MAP development, including any development with Sacramento County or within the jurisdiction of another Potential Permittee, also would constitute a significant departure from the Plan's OCP and would trigger a new effects analysis, a new conservation strategy, and issuance of Incidental Take Permits to the Potential Permittee for that additional urban development." (NBHCP p. I-3)

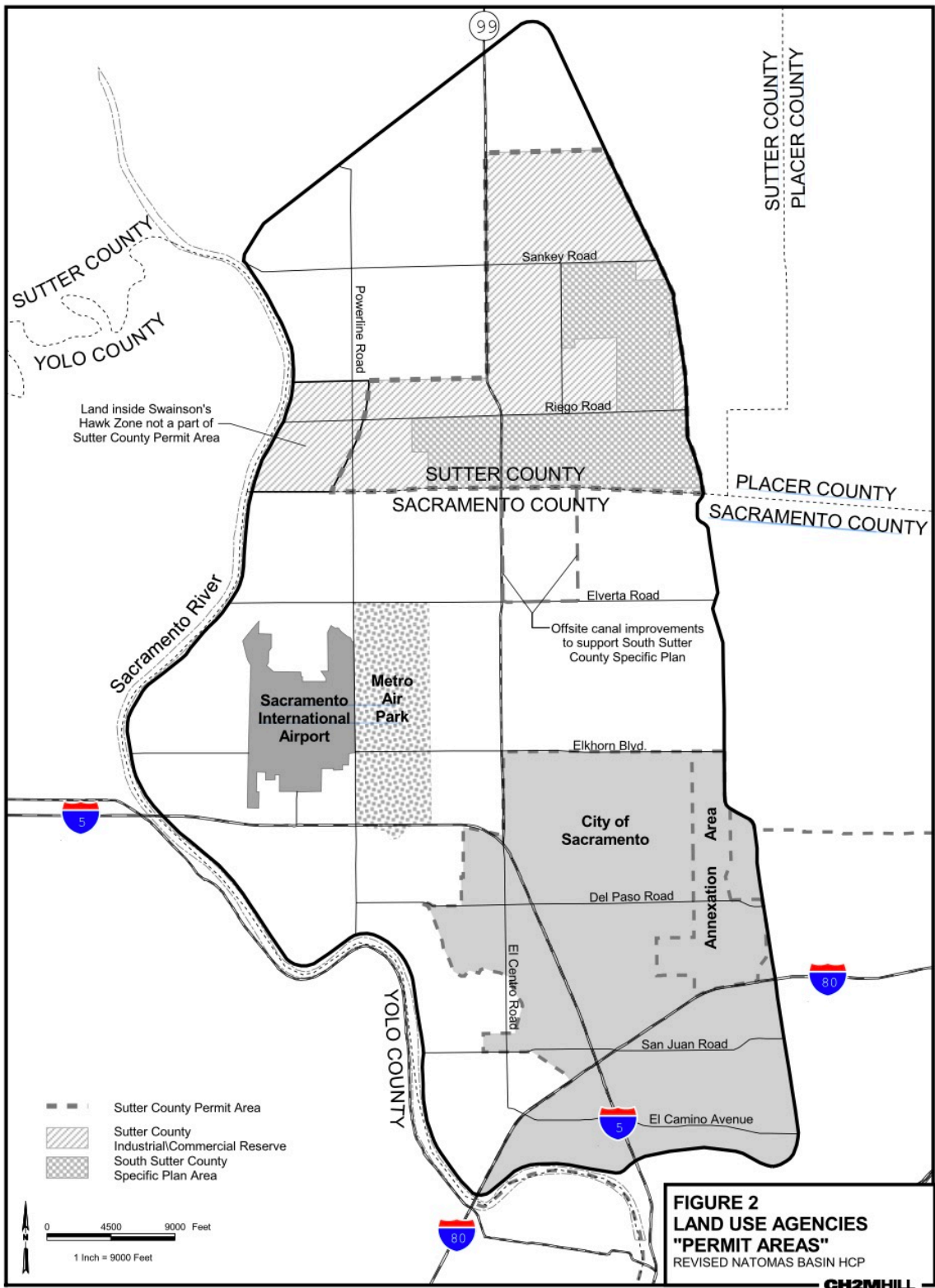
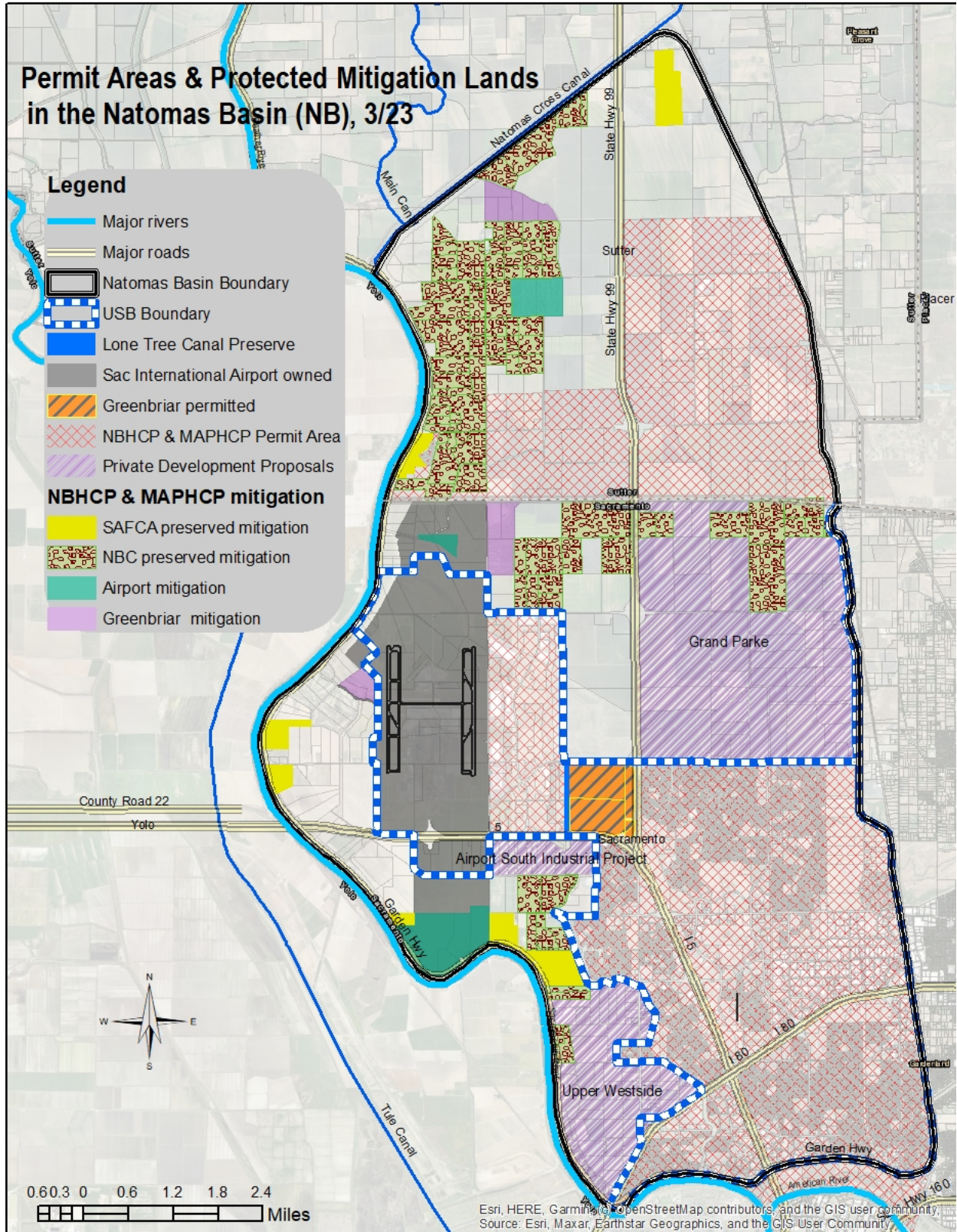


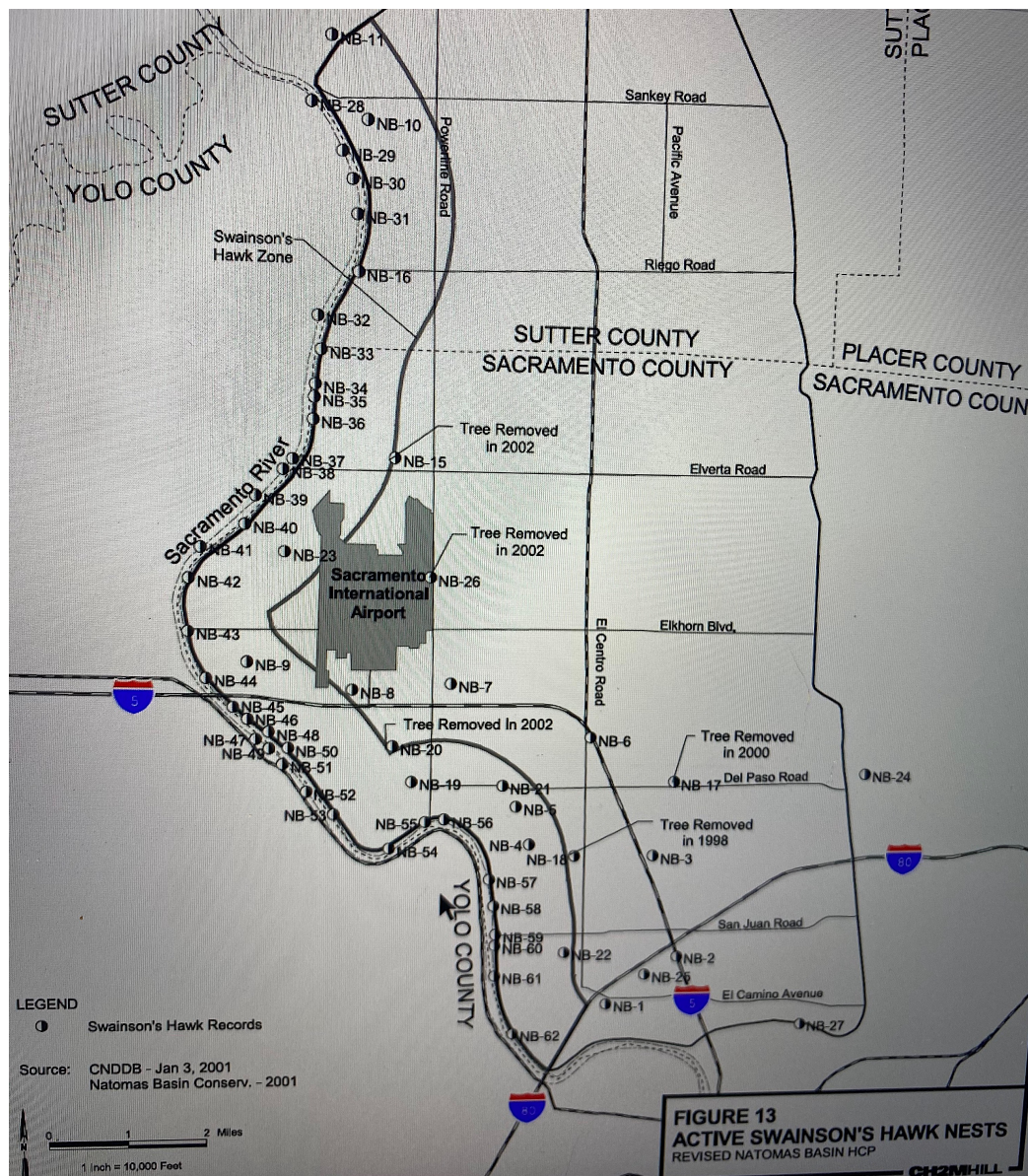
FIGURE 2
LAND USE AGENCIES
"PERMIT AREAS"
 REVISED NATOMAS BASIN HCP

CH2MHILL

The map below was created by Habitat 2020 to show all of the current mitigation lands in the Basin and major proposed projects as of March, 2023.



The NBHCP includes the Swainson's Hawk Zone. This zone is defined as the "lands which are not currently developed (excluding the 252 acres of land designated "Urban" on the City of Sacramento General Plan and the North Natomas Community Plan located within the City of Sacramento) and which are located within the Natomas Basin and within one mile east of the Sacramento River and extending from the Natomas Cross Canal on the north and Interstate 80 on the south." See also Figure 13 of the NBHCP, located at the end of the NBHCP. It appears that the project area is at least in part located in the Swainson's Hawk Zone. All NBHCP documents can be found at www.natomasbasin.org.



Also at page 41, the Airport Master Plan FSEIR identifies loss of farmland north of Elverta, and requires 1 to 1 mitigation, but does not identify loss of farmland south of I-5. The NOP (p. NOP-4) identifies the project site as zoned as agricultural and surrounded by other agricultural uses. The present SEIR should include this impact since it was not included in the prior SEIR.

The Master Plan FSEIR at 4-47 identifies 495 acres of mitigation land conserved on airport property south of I-5 and adjacent to the Sacramento River which has been set aside to mitigate for various airport projects. It is shown in green in our map of mitigation land shown above. It appears the County intends to dedicate from this pool to cover the mitigation requirements of the SWIFT project. If so, please disclose in the SEIR exactly how the 495 acres of mitigation land are allocated.

The Master Plan FSEIR relies on the County Swainson's Hawk ordinance to define mitigation requirements for the loss of foraging and nesting habitat for Swainson's Hawks. It does not evaluate whether that ordinance mitigation requirements conflict with the Natomas Basin Habitat Conservation Plan or the Metro AirPark HCP. At least one section of the ordinance does seem to be in conflict: it allows mitigation land to be located outside the Natomas Basin. Please include the restriction on mitigation land that it be located in the Natomas Basin, to mitigate for loss of habitat used by Natomas populations of species as required by the NBHCP. We are also concerned that a greater than 1:1 mitigation ratio is necessary to ensure mitigation is sufficient to reduce impacts to less than significant given the development pressures in Natomas and growth inducing and cumulative impacts.

The SEIR should clearly require take permits from the state and federal wildlife agencies since the project is within the Natomas Basin which previously has been found by these agencies to be habitat for 22 listed species. The NBHCP is a regional HCP covering the entire Natomas Basin.

Also shown in the map above are various other proposed projects which combined with the SWIFT project will have **cumulative and growth inducing impacts** on the Natomas Basin Habitat Conservation Plan and the Natomas Basin Conservancy. We are concerned that the project would be growth inducing for agricultural lands in the Swainson's Hawk zone in proximity to the project area. Please assess that impact and how to mitigate to less than significant.

30X30

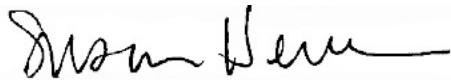
30X30 goals are to conserve 30% of terrestrial lands and marine areas by 2030 to elevate the role of nature in fighting climate change and preserve biodiversity. See <https://www.californianature.ca.gov/>

Our organizations' goals align with the statewide, national and international 30X30 goal for preservation. The project area is farmland within the SACOG region. The SACOG region falls completely within the California Floristic Province, one of 33 biodiversity hotspots on the planet. To be classified as a biodiversity hotspot, a region must have at least 1,500 species of endemic vascular plants, irreplaceable species found nowhere else. The region must also be considered threatened, having lost 70% or more of its original vegetation to anthropogenic activities.

Worldwide, biodiversity hotspots account for less than 2.5% of earth's terrestrial surface area, but they are home to almost half of the world's plant and animal species, which are endemic to these hotspot regions. The SWIFT project, which is outside the permit area of the NBHCP, **conflicts with achieving targeted land conservation through the 30X30 program**, particularly the priorities of the Sierra Club, Mother Lode Chapter for land conservation in this region. Instead of developing this parcel the County should consider applying for state funding to permanently preserve agriculture on the property consistent with the overflight restrictions.

We endorse all comments made by the Natomas Basin Conservancy.

Thank you for this opportunity to comment on the SWIFT NOP.



Susan Herre, President of ECOS, The Environmental Council of Sacramento



Rob Burness, Co-Chair Habitat 2020 and Sierra Club MLC Acting Conservation Chair




Barbara Leary Chair, Sacramento Group, Sierra Club



Paul Miller, President, Sacramento Audubon Society

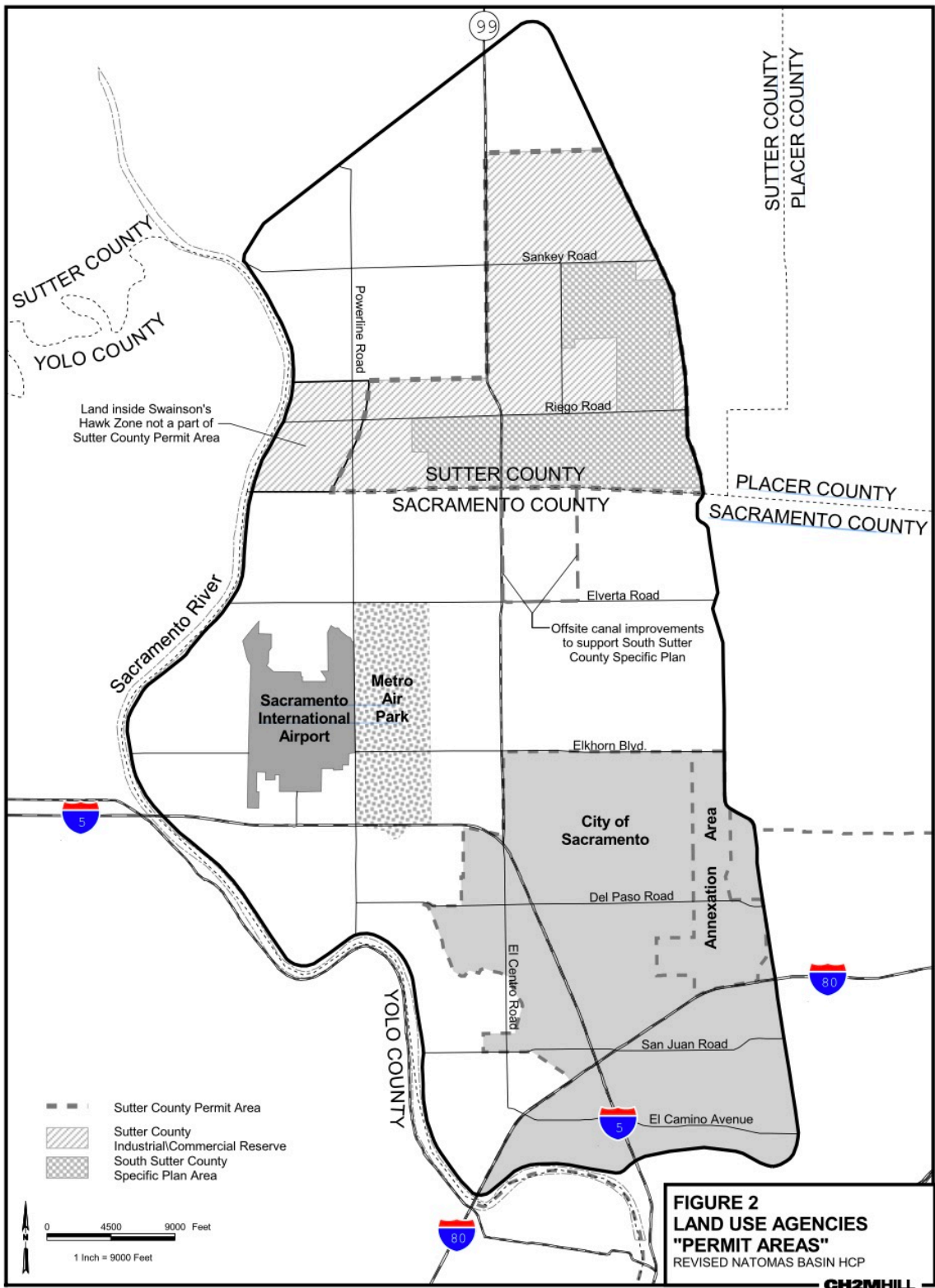


James P. Pachl, Friends of the Swainson's Hawk

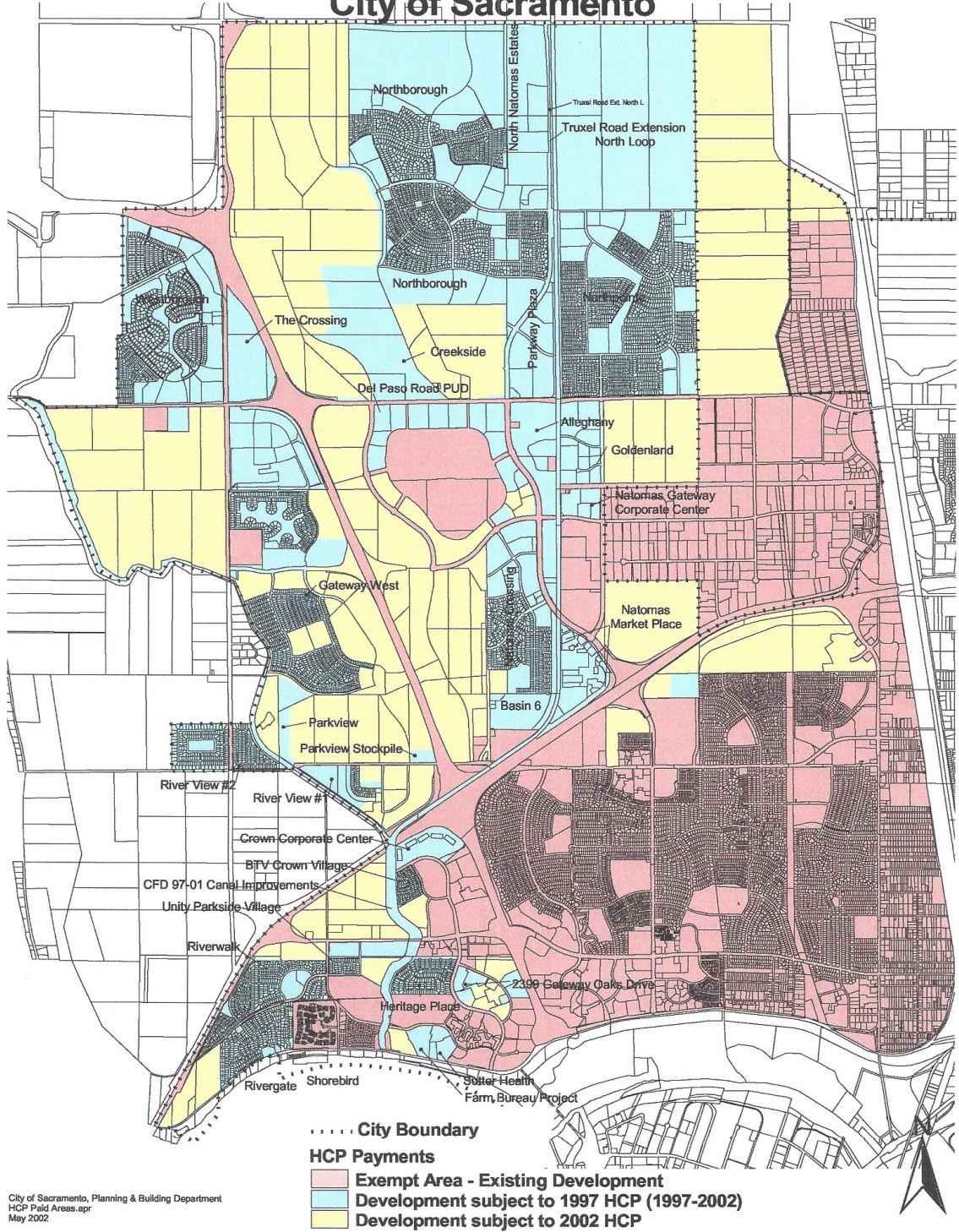


Judith L. Lamare, Friends of the Swainson's Hawk

C: John Roberts, Executive Director Natomas Basin Conservancy
Dylan Wood, and Tanya Sheya, CDFW
Kevin Thomas, CDFW
Kelley Barker, CDFDW
Michelle Haven USFWS



Baseline Map - Exhibit B City of Sacramento



City of Sacramento, Planning & Building Department
HCP Paid Areas.apr
May 2002

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401 | FAX (530) 741-4245 TTY 711
www.dot.ca.gov



September 13, 2023

GTS # 03-SAC-2023-01455
SCH # 2023080394

Julie Newton
Environmental Coordinator
Sacramento County Department of Transportation
827 7th street
Sacramento, CA 95814

Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project

Dear Ms. Newton:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The Sacramento County Department of Airports has formed a public/private partnership with WattEV to construct, own, operate, and cost share the Sacramento County WattEV Innovative Freight Terminal (SWIFT) project, located within the Sacramento International Airport Master Plan area in the northwest portion of Sacramento County, approximately 7.5 miles from downtown Sacramento. Specifically, the project is located south of Interstate 5 (I-5) and immediately south of Sacramento International Airport. The project would provide a publicly accessible Electric Vehicle (EV) charging facility that would be built on a 118-acre parcel of land along a major freight corridor. Facility development would include the installation of Direct Current Fast Chargers (DCFC) and Megawatt Chargers powered by a new solar array that would support charging for shippers and transporters as well as public transportation and passenger vehicles. Based on the application package provided, Caltrans provides the following comments:

Freeway Operations

This project would add significant truck traffic to the following facilities:

"Provide a safe and reliable transportation network that serves all people and respects the environment"

- Interstate 5 (I-5)
- I-5/Airport Boulevard interchange
- I-5/Metro Air Parkway interchange

Please prepare a traffic study that investigates the “No Project” and “Plus Project” scenarios under Existing and Cumulative conditions. The traffic study should calculate trip generation, taking into account the adjusted heavy vehicle percentage with the addition of the project, as well as modifications to the trip assignment, since many of the project trips would be pass-by and diverted trips.

The traffic study should investigate off-ramp queue lengths at the following off-ramps:

- I-5 northbound (NB)/Airport Boulevard off-ramp
- I-5 southbound (SB)/Airport Boulevard off-ramp
- I-5 NB/Metro Air Parkway off-ramp
- I-5 SB/Metro Air Parkway off-ramp

Please utilize peak hour maximum queue length rather than the 95th percentile queue length. Please use a calibrated simulation model, with software such as SimTraffic or VISSIM, for this analysis. Please include on-ramp meters in these simulations.

Additionally, please analyze peak hour level of service operations and traffic signal warrants for the following intersections under Plus Project conditions:

- I-5 NB Ramps/Airport Boulevard
- I-5 SB Ramps/Airport Boulevard
- Bayou Way/Airport Boulevard
- Bayou Way/Power Line Road
- I-5 NB Ramps/Metro Air Parkway
- I-5 SB Ramps/Metro Air Parkway
- Bayou Way/Metro Air Parkway

Please analyze on-ramp queues from the ramp meters. Coordinate with Caltrans Freeway Operations staff for ramp metering rates and future ramp metering assumptions. Please use the methodology described in Section 1.4 of the Ramp Metering Design Manual. If these analyses determine the addition of the project would adversely affect operations and safety of the freeway mainline or listed interchanges, the project will need to pay fair-share towards interchange improvements.

Traffic Safety

- Please describe if traffic studies show major impacts to the interchanges, what are your planned mitigations.

- Please clarify whether ramps being investigated for signal warrants, metering, and the potential addition of on/off lanes.
- Please explain if the additional truck volume and potential queue length at these interchange off-ramps spill back to the freeway mainline.

Sustainability

Caltrans applauds this effort to advance zero emissions charging for freight. In keeping with the goals set forth in Assembly Bill 32 and related statutes and implementing policies, please provide an estimate or calculations of the greenhouse gas reductions that are expected to be derived from the project.

Encroachment Permit

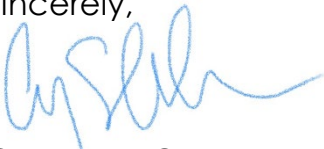
Any project along or within the State's right of way (ROW) requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to:

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 proposal. 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 Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,



GARY ARNOLD, Branch Chief
Local Development Review, Equity and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3



September 13, 2023

Environmental Coordinator
Sacramento County
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
ceqa@saccounty.net

Subject: **Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project / NOP / 2023080394**

Dear Ms. Newton:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project (Project, SCH 2023080394).

As a Responsible Agency, SMUD's review of projects include supporting the goals of our 2030 Zero Carbon Plan. This plan is a flexible road map to eliminate greenhouse gas emissions from our electricity production by 2030, which is the most ambitious goal of any large utility in the United States, while maintaining reliable and affordable service. This ambitious goal puts the Sacramento region on the map as an example to follow and a region where innovative, climate-friendly businesses want to be. As a community-owned, not-for-profit utility, our customers and community are at the heart of all we do. By pursuing zero carbon, we're helping create a cleaner and healthier region for all.

It is our desire that the Project will acknowledge any impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
 - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- The potential need to relocate and/or remove any SMUD infrastructure that may be affected in or around the project area

More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:

- SMUD will need a 69 kilovolt (kV) route to customers substation from Power Line Road
- Existing overhead 12kV and 69kV along Power Line Road and Bayou Way must remain

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD, and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this Project. If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.5063, or by email at Kim.Crawford@smud.org.

Sincerely,



Kim Crawford
Environmental Services Specialist
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

cc: Entitlements



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 14, 2023

Julie Newton
Environmental Coordinator
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814
CEQA@saccounty.gov

Subject: Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project-
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)
Control# PLER2023-00069; SCH# 2023080394

Dear Julie Newton:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of a Draft Supplemental Environmental Impact Report (DSEIR) from Sacramento County for the Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project (Project) in the county of Sacramento pursuant the California Environmental Quality Act (CEQA) statute and guidelines.¹ CDFW previously submitted comments in response to the Sacramento Airport Master Plan Update on October 13, 2020 (SCH: 2005082017).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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sustainable populations of those species (*Id.*, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located within the Sacramento International Airport Master Plan area in the northwest portion of Sacramento County, approximately 7.5 miles from downtown Sacramento. Specifically, the project is located south of Interstate 5 (I-5) and immediately south of Sacramento International Airport. The project site generally covers APNs 225-0010-003, 225-0010-035, 225-0010-036, and 225-0010-006.

Project Facilities

The Project consists of providing a publicly accessible Electric Vehicle (EV) charging facility that will be built on a 118-acre parcel of land along a major freight corridor. Facility development will include the installation of Direct Current Fast Chargers (DCFC) and Megawatt Chargers powered by a new solar array that will support charging for shippers and transporters as well as public transportation and passenger vehicles. In addition, the project will include accessory structures which are discussed further below.

The proposed project includes deployment of advanced high-powered public charging stations and associated facilities powered by a 12.5 megawatt alternating current (MWac) solar generation field, with nameplate power of 31.2 megawatts of direct current (MWdc), to support zero-electric freight movement in Sacramento. The charging areas and associated support facilities will occupy approximately 24 acres of land on the northern portion of the project site while the remaining 94 acres of the site will be occupied by solar fields.

The project site will be configured with two truck charging areas separated by a publicly accessible central plaza. The truck charging areas will include six 3,600-kilowatt (kW) charger configurations. Each configuration will consist of three Megawatt Charging Standard (MCS) 1,200 kW chargers and fifteen 240 kW Combined Charging Standard (CCS) chargers, for a total of 18 MCS chargers and 90 CCS chargers designed for heavy and medium duty (MHD) trucks. The truck charging pads are expected to cover 7.8 acres. In addition to the charging pads, a parking lot for trailers will be provided with an average of 53 parking stalls spread over 2.8 acres of land. The proposed project will

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also include the installation of 30 CCS chargers dedicated for passenger vehicles, which will be located at the central plaza.

Three buildings will be included within the public plaza. The first building will include offices housing operations staff, a trucker refreshment area, trucker restrooms, and a resting lounge. It will consist of a single story and have a footprint of approximately 2,700 square feet. The second building will include a convenience store, food outlets, restrooms, and a resting lounge for the public. It will also consist of a single story and have a footprint of approximately 7,000 square feet. The third building will contain two stories and be designated as a public visitor center, providing information about California's progress and milestones towards clean air initiatives and emission reduction. The footprint of the public plaza will be approximately 5.25 acres.

Site Access

Access to the project site will be provided along Bayou Way, which borders the site to the north and is parallel to I-5, via Airport Boulevard and its nearby interchange with I-5. Direct access to the project site will be provided by three sets of ingress and egress points (six total access points) along Bayou Way. Two sets of ingress and egress points will serve the truck charging areas while the third set of ingress and egress points will serve the public plaza.

Offsite Improvements

Development of the project will include improvements to portions of Bayou Way to facilitate increased volumes of truck and passenger car traffic. This could include widening of the roadbed and shoulders in some locations. Furthermore, improvements to the interchange of Airport Boulevard and I-5 may be required. The extent of these improvements is still under development.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist Sacramento County in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming DSEIR address the following:

Project Description

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

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As required by § 15126.6 of the CEQA Guidelines, the DSEIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DSEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the DSEIR specifically include:

1. An assessment of all habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition (Sawyer 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the Department webpage www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife

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Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

3. A complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. The DSEIR should include the results of focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Species-specific surveys should be conducted in order to ascertain the presence of species with the potential to be directly, indirectly, on or within a reasonable distance of the Project activities. CDFW recommends Sacramento County rely on survey and monitoring protocols and guidelines available at: www.wildlife.ca.gov/Conservation/Survey-Protocols. Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.
4. A thorough, recent (within the last two years), floristic-based assessment of special-status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see www.wildlife.ca.gov/Conservation/Plants).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DSEIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on biological resources are fully analyzed, the following information should be included in the DSEIR:

1. The DSEIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The DSEIR must demonstrate that the significant environmental impacts of the Project were adequately investigated

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and discussed and it must permit the significant effects of the Project to be considered in the full environmental context.

2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The DSEIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DSEIR should discuss the Project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The DSEIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-status species, open space, and adjacent natural habitats in the cumulative effects analysis.

Mitigation Measures for Project Impacts to Biological Resources

The DSEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. CDFW also recommends the environmental documentation provide scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

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1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § 3511) have the potential to occur within or adjacent to the Project area, including, but not limited to: white-tailed kite (*Elanus leucurus*). Project activities described in the DSEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. If fully protected species cannot be completely avoided, the Project should obtain incidental take coverage for all species that have the potential to be present within or adjacent to the Project Area². CDFW also recommends the DSEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that Sacramento County include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.
2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western spadefoot (*Spea hammondi*), and western pond turtle (*Emys marmorata*). Project activities described in the DSEIR should be designed to avoid any SSC that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DSEIR fully analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends Sacramento County include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.
3. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in The Manual of California Vegetation (Sawyer 2009). The DSEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
4. *Native Wildlife Nursery Sites*: CDFW recommends the DSEIR fully analyze potential adverse impacts to native wildlife nursery sites, including but not limited to bat maternity roosts. Based on review of Project materials, aerial photography, and observation of the site from public roadways, the Project site contains potential nursery site habitat for structure and tree roosting bats and is near potential foraging habitat. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). CDFW recommends that the DSEIR fully identify the Project's potential impacts to native wildlife nursery sites, and include

² CDFW may only issue incidental take permits for fully protected species for specified projects under certain conditions per SB 147.

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appropriate avoidance, minimization and mitigation measures to reduce impacts or mitigate any potential significant impacts to bat nursery sites.

5. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DSEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration, enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The DSEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

6. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may

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include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at www.wildlife.ca.gov/Licensing/Scientific-Collecting#53949678-regulations-.

7. *Nesting Birds*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the DSEIR.

CDFW recommends the DSEIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DSEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

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8. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, Sacramento County should state in the DSEIR a requirement for a qualified biologist with the proper handling permits, will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the DSEIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The DSEIR should also describe qualified biologist qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.
9. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the DSEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

The DSEIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the DSEIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring mitigation in this way, the DSEIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (Fish & G. Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project.

The Project area has the following State-listed species that are known to be present:

- Swainson's hawk (*Buteo swainsoni*)
- Giant garter snake (*Thamnophis gigas*)

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The Project area as shown in the NOP also may include habitat for these State and/or federally listed species: bank swallow (*Riparia riparia*), California tiger salamander (*Ambystoma californiense*), tricolored blackbird (*Agelaius tricolor*), valley elderberry longhorn beetle (*Desmocerus californicus dimorphous*), vernal pool fairy shrimp (*Branchinecta lynchi*), vernal pool tadpole shrimp (*Lepidurus packardii*), Bogg's Lake hedge-hyssop (*Gratiola heterosepala*), Sacramento Orcutt grass (*Orcuttia viscida*), and slender orcutt grass (*Orcuttia tenuis*).

The DSEIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, if applicable, CDFW recommends the DSEIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Regional Habitat Conservation Plans

CEQA Guidelines section 15125(d) states that EIRs must discuss any inconsistencies between projects and applicable plans (including habitat conservation plans/natural community conservation plans). If the Project is contemplating the viability of offsite mitigation, the EIR should include a discussion of each Project alternative's consistency with any approved habitat conservation plan that overlaps with the Project's mitigation area or the Project itself. Such plans would include the Natomas Basin Habitat Conservation Plan (NBHCP), Metro Air Park Habitat Conservation Plan (MAP HCP), Yolo Habitat Conservation Plan/Natural Community Conservation Plan, South Sacramento Habitat Conservation Plan (SSHCP), and the Placer County Conservation Program.

NBHCP and MAP HCP

The Project is within the boundaries of the NBHCP and adjacent to the boundary of the MAP HCP. CEQA Guidelines section 15125(d) states that EIRs must discuss any inconsistencies between projects and applicable plans (including habitat conservation plans/natural community conservation plans). Because the NBHCP and MAP HCP are

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currently in implementation, CDFW recommends that the DSEIR include a discussion of each Project alternative's consistency with the NBHCP and MAP HCP and how Sacramento County will ensure that implementation of the Project alternatives do not impede the ability to meet the NBHCP's or MAP HCP's permit conditions and biological goals and measurable objectives. Particular focus in the DSEIR's analysis should be directed to:

- Analysis of all NBHCP and MAP HCP Covered Species.
- Assessment of habitat types identified in the NBHCP and MAP HCP.
- Analysis of aquatic migratory corridors for giant garter snake.
- Identification of applicable NBHCP and MAP HCP avoidance, minimization, or mitigation measures.
- Analysis of any impacts to land commitments of the NBHCP and MAP HCP.
- Discussion of any inconsistencies between the Project and the NBHCP and MAP HCP.

To identify any potential inconsistencies with the NBHCP and MAP HCP and provide special emphasis on rare or unique resources in compliance with CEQA, CDFW recommends that the DSEIR also address the following:

- Project related impacts from developing up to 118 acres of non-habitat related development (or otherwise potentially incompatible land use) on the available ecosystem resources available for NBHCP and MAP HCP Covered Species. Persistence of the NBHCP and MAP HCP Covered Species, critical for the success of both plans, includes sustaining the appropriate levels of habitat (foraging, nesting, dispersal, cover, etc.) to support all Covered Species within the NBHCP and MAP HCP boundaries.
- Project related impacts from developing up to 118 acres of non-habitat related development (or otherwise potentially incompatible land use) adjacent to established or future reserve land managed under the Natomas Basin Conservancy (TNBC).
- Reduction of available reserve land if the Project develops up to 118 acres for non-habitat uses. Note, reserve land described in the NBHCP and MAP HCP must meet both habitat value criteria and be sited with appropriate buffers and setbacks.
- The potential for the Project to cause financial impacts to The Natomas Basin Conservancy and fee-payers under the NBHCP and MAP HCP.

Swainson's Hawk

The Natomas Basin is known for its importance to Swainson's hawk within the Sacramento Valley (NBHCP 2003). Over 100 documented nesting occurrences occur

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within 10 miles³ of the Project area (The Natomas Basin Conservancy 2022 Implementation Annual Report). Therefore, high value foraging habitat present in a majority of the Project area could contribute to foraging ability for hundreds of Swainson's hawks in the Natomas Basin, as well as those using surrounding nests in Yolo and east and south Sacramento County, and Swainson's hawk migrating through the Project area (CDFW 2023). This highlights the Natomas Basin's unique contribution in providing valuable nesting and foraging habitat, both of which are essential for the species' life history. As such, a thorough evaluation in the EIR of the Project's impacts to both nesting and foraging habitat as independent factors will be crucial, considering the value of the Natomas Basin for the species. The EIR should cite survey methodology, specifically a full set of protocol surveys using the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Tech. Advis. Comm., 5/2000), empirical data, and discuss how proposed avoidance, minimization, and mitigation measures for the Project are informed by that information. Having this information in the DSEIR facilitates more efficient and detailed review and feedback from CDFW.

A portion of the Project area is mapped within the Swainson's Hawk Zone (SHZ), which the NBHCP describes as the area within one mile of the Sacramento River in the Natomas Basin. The SHZ was derived from the high density of Swainson's hawk nests within this area and scientific evidence for the value of the habitat (NBHCP 2003). The NBHCP recognizes the importance of the SHZ to this species and the viability of their plan which resulted in substantial effort from the City of Sacramento and Sutter County to replan development outside of this area. Replanning efforts in the SHZ have been vital to preserve the area's ecological value and the overall goals of the NBHCP, despite the associated economic and political opportunity costs. Although the County is not party to the NBHCP, CDFW recommends the County considers the Project's 1) biological impact in an ecologically valuable area and 2) the effect that Project development in the SHZ will have on the continued implementation and viability of the NBHCP, as well as the MAP HCP.

As such, robust analysis of the Project's potentially significant effects on Swainson's hawk will be a critical part of the development of the EIR. With the Project in the SHZ, there could be several potentially significant effects to the species, both in the project-specific and cumulative context. Creating a feasible mitigation approach should be an early and focal part of the DSEIR development given the high utilization of the area by the species.

While typical projects often focus on initial surveys, this Project is in a particularly unique area where extensive surveys and biological resource mapping has already been completed. The most recent surveys indicated that at least one Swainson's hawk nest is present within the Project area (TNBC 2022, CDFW 2023). Due to the density of

³ 10 miles is typically understood as the maximum distance to which a Swainson's hawk will forage during the breeding season (SSHCP 2018)

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September 14, 2023

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known nest sites, CDFW recommends the DSEIR analyze the individual nesting and foraging behavior patterns associated with each known nest pair and propose avoidance, minimization and mitigation that specifically addresses those patterns, rather than simply acknowledging presence. CDFW also recommends the DSEIR analyze the Project's regional impacts to the species, both to the overall persistence of Swainson's hawk within the Natomas Basin and indirect impacts to individual Swainson's hawk that may depend on the Project area's foraging habitat. Data from such studies can more effectively inform a mitigation strategy that complies with CESA.

Other Covered Species

The Natomas Basin has significant biological resources, including habitat and documented occurrences for 22 Covered Species under the NBHCP and other sensitive species. While CDFW recognizes the need for focus on Swainson's hawk and giant garter snake, further detail on the other Covered Species is needed so that all impacts to fish, wildlife, and plant resources can be adequately assessed. Specific focus on the resources likely to be most impacted, including the 22 Covered Species, and robust analysis of these species can strengthen the Project's mitigation strategy.

Lake and Streambed Alteration Program

The DSEIR should identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the DSEIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

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September 14, 2023

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If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the DSEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. Notifications for projects involving (1) sand, gravel or rock extraction, (2) timber harvesting operations, or (3) routine maintenance operations must be submitted using paper notification forms. All other LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.
2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography and observation of the site from public roadways, the Project site supports the Sacramento River and its associated

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riparian habitat. CDFW recommends the DSEIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by Sacramento County and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

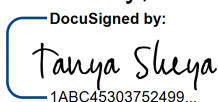
CONCLUSION

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670.

CDFW appreciates the opportunity to comment on the Notice of Preparation of the DSEIR for the Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project and recommends that Sacramento County address CDFW's comments and concerns in the forthcoming DSEIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact Ben Huffer, Environmental Scientist at (916) 216-6253 or benjamin.huffer@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tanya Sheya
Environmental Program Manager

Sacramento County Watt EV Innovative Freight Terminal (SWIFT) Project
September 14, 2023
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ec: Dylan Wood, Senior Environmental Scientist (Supervisory)
Ben Huffer, Environmental Scientist
Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

Literature Cited

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California.
<http://vegetation.cnps.org/>

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South Sacramento Habitat Conservation Plan. 2018. Sacramento County

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sacog.org

September 14, 2023

Julie Newton, Environmental Review Coordinator
Sacramento County Planning and Environmental Review
827 7th St Ste 102
Sacramento, CA 95814
CEQA@saccounty.gov

Subject: ALUC Preliminary Review of SWIFT Project

OVERVIEW

The Sacramento County Department of Airports has formed a partnership with a private entity for the purpose of constructing, owning, operating, and sharing costs for a project referred to as the Sacramento County WattEV Innovative Freight Terminal (SWIFT) project. The project site is on Sacramento International Airport property approximately 4,700 feet from the approach end of Runway 35R and immediately south of Interstate 5.

A Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) was circulated to various agencies including the Airport Land Use Commission (ALUC) for Sacramento, Sutter, Yolo and Yuba Counties. This memo serves as the ALUC's comment letter to the NOP.

The ALUC adopted an Airport Land Use Compatibility Plan (ALUCP) for Sacramento International Airport in December 2013. The project site lies within the boundaries of the area covered by that plan. A formal review ALUC of the proposed project will therefore be required, however not at this time. At present the focus of this Memo is on identifying issues that should be addressed in the SEIR.

BACKGROUND

In accordance with the state statutes that govern the functioning of ALUCs, ALUCs do not have authority over the design or operation of airports although they do have responsibilities for reviewing certain airport planning and proposed project actions. As indicated in the ALUCP, specific among these actions are airport master plans (Policy 1.5.5) and most development proposals that do not serve an aviation-related purpose (Policy 1.5.4(c)). The latter policy notes that an exception to the review requirement for non-aviation development occurs when such development has previously been included in an airport master plan or community general plan reviewed by the ALUC.

As is evident from the description of the proposed project summarized in the next section, its purpose is not aviation-related. According to the NOP, the Sacramento International Airport Master Plan was updated in 2021 and the project site is designated

Auburn
Citrus Heights
Colfax
Davis
El Dorado County
Elk Grove
Folsom
Galt
Isleton
Lincoln
Live Oak
Loomis
Marysville
Placer County
Placerville
Rancho Cordova
Rocklin
Roseville
Sacramento
Sacramento County
Sutter County
West Sacramento
Wheatland
Winters
Woodland
Yolo County
Yuba City
Yuba County

for commercial development. In any case, the project site's designation is too general to adequately describe the proposed project or enable its consistency with the ALUCP criteria to be determined. Thus, an ALUC review of the proposal will be required later and the SEIR should note this requirement.

PROPOSED PROJECT

The project site consists of approximately 118 acres. Its current use is agricultural. Basically, the project entails installation of "advanced high-powered public charging stations" for electric vehicles ranging from automobiles to large trucks. The charging stations will be powered by a solar generation field to be constructed on 94 acres of the site. The remaining 24 acres will be occupied by the charging stations and support facilities. The latter will include operations staff offices, a lounge and rest area for truckers, a convenience store and food outlets, and public restrooms.

AIRPORT LAND USE CONSISTENCY EVALUATION

ALUCP CRITERIA

The ALUCP addresses the four airport land use compatibility factors required by the state *Airport Land Use Planning Handbook*: noise, safety, airspace protection, and overflight. The ALUCP may be found online at <https://www.sacog.org/comprehensive-land-use-planning-maps>.

- *Noise and Overflight*: The noise factor deals with high noise levels that may be disruptive to activities on the ground. Overflight addresses noise from individual aircraft overflights in locations outside of the noise contours and not necessarily disruptive to activities, but which may nevertheless be annoying to some people.
- *Safety*: The safety factor addresses the potential consequences of an aircraft accident should one occur. Safety compatibility criteria limit the density (dwelling units per acre) of proposed residential uses and intensity (people per acre) of proposed nonresidential uses and also restrict creation of certain particularly risk-sensitive uses such as children's schools. The ALUCP safety criteria take into account two different types of aircraft accidents. For events in which the aircraft is descending but under control, the pilot will try to land on any available relatively flat and open area free of large objects and people. Because buildings and other development of most projects are not evenly spread over the site, the risks to people on the ground can be reduced by limiting the overall usage intensity thus creating areas that are relatively unoccupied. Clustering of people in one part of a site presents a different type of risk, however. This risk arises from accidents in which the aircraft is not under the pilot's control and will fall on whatever is in its path. The ALUCP addresses this potential consequence by restricting the number of people concentrated in

a small area, specifically a single acre, and by limiting the percent lot coverage of the building footprint.

- *Airspace Protection:* The objective of airspace protection criteria is to ensure that proposed land uses do not have features that can cause or contribute to causing an aircraft accident. These features can be physical, visual, or electronic in character. The primary component of airspace protection criteria is a limitation on the height of structures and other objects. The specific limits are set by the Federal Aviation Administration (FAA) in Part 77 of the Code of Federal Regulations (14 CFR 77), Safe, Efficient Use and Preservation of Navigable Airspace. Another important component of airspace protection is glare. Bright lights along routes flown by aircraft at low altitudes can create hazards by momentarily blinding pilots. Yet another concern is any land use that attracts birds near a runway or its approach and departure paths. FAA guidance with regard to bird strike hazards is noted in ALUCP Policy 3.4.3.

COMPATIBILITY EVALUATION

Noise and Overflight Factors

The project site is in a location subject to noise from both aircraft operations and highway traffic. Noise and overflight impacts are not a concern for the project, however, as none of the component uses are highly noise sensitive. Only the truckers' lounge might be sensitive and this factor can be addressed by sound attenuation within the structure as needed to reduce noise intrusion to an acceptable CNEL 45 dB level.

Safety Factor

Approximately half of the project site lies with Safety Zone 2 and the remainder in Safety Zone 3. The ALUCP criteria for these zones allow an average of up to 60 and 100 people per acre, respectively. An individual 1-acre area can have up to 120 people in Zone 2 and 250 people in Zone 3.

No details are available with regard to the number of people who might be on the site at any one time. Nevertheless, the character of the proposed uses in the public area of the site suggest that the intensity limits are unlikely to be exceeded. The most critical among the intensity criteria is the Zone 2 limit of 120 people in a single acre. The SEIR should provide documentation that this criterion will be met.

Airspace Protection Factor

Three aspects of the airspace protection are potentially a concern with respect to the proposed project: the height of structures; elements that could attract birds; and glare from the solar arrays.

The components of the project described in the NOP are all low height and would not constitute airspace obstructions. However, nothing is mentioned about the heights of light fixtures and antennas that presumably would be part of the project. Data for any object that would extend above a 100:1 slope from the approach end of Runway 35R

should be submitted to the Federal Aviation Administration (FAA) for an aeronautical study in accordance with Federal Aviation Regulations Part 77. The SEIR should note this requirement.

Existing natural and manmade water features in the vicinity of Sacramento International Airport already create bird attraction issues for the airport. While the ALUC has no authority over these features, the concept of its policy with respect to new development is that the development should not have features that could add to bird attraction in the nearby area. The ALUC's criteria in this regard mirror those established by the FAA. Specifically, ALUCP Policy 3.4.3(c) says that "the project proponent shall document consideration of current FAA or other federal regulations and guidelines pertaining to hazardous wildlife attractants." This documentation should be provided in the SEIR.

With regard to the concern over possible glare from the solar arrays, FAA and ALUC criteria for acceptable amounts of glare are not precise. Nevertheless, software tools are available that can be used to analyze how much glare a proposed development may create. The ALUC recommends that a detailed glare analysis be conducted for the SWIFT project and the results presented in the SEIR

CONCLUSIONS AND RECOMMENDATIONS

As noted at the beginning of this Memo, a formal ALUC determination as to the proposed SWIFT project's compliance with ALUCP criteria is premature pending the project applicant's preparation and submittal of additional design details and the analyses recommended above. Documentation of these details and analyses should be included in the SEIR or attachments thereto.

Please let me know if you would like to discuss any of these matters.



Gregory R. Chew, Senior Planner
Sacramento Area Council of Governments/Airport Land Use Commission
gchew@sacog.org

September 21, 2023

Julie Newton, Environmental Coordinator
Planning and Environmental Review
County of Sacramento
827 7th Street, Room 225
Sacramento, CA 95814

SUBJECT: CITY OF SACRAMENTO RESPONSE FOR THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR SACRAMENTO COUNTY WATTEV INNOVATIVE FREIGHT TERMINAL (SWIFT) PROJECT (PLER2023-00069).

Dear Ms. Newton,

On August 23, 2023, the City of Sacramento (City) received correspondence of the Notice of Preparation (NOP) for the Draft Environmental Impact Report for Sacramento County WattEV Innovative Freight Terminal (SWIFT) Project. The City's comments below are preliminary in nature and respond specifically to the information presented and scope of analysis proposed. The Planning Division of the Community Development Department presents the comments below.

Habitat Conservation Plan

While the County is not a party to the Natomas Basin Habitat Conservation Plan (NBHCP) nor the Metro Air Park Habitat Conservation Plan (MAP HCP), activities that could affect the success of the conservation strategy established in the NBHCP and MAP HCP should be considered in the EIR. To clarify and ensure that there are no impacts to these HCPs, the City of Sacramento requests that any biological/agricultural mitigation lands be designated on existing Airport/County-owned lands or outside of Natomas Basin.

Transportation/Circulation

In addition to the proposed project, the County is considering significant land use development proposals in the Natomas Basin. The proposed Airport South Industrial (ASI) Project Annexation currently in process with the City of Sacramento is near the SWIFT project. The County and City have mutual interests in the Natomas Basin. City staff requests that the County coordinate with us the scope of analysis for evaluating transportation/circulation that will be conducted for the SWIFT project. Please contact Pelle Clarke with Department of Public Works at PClarke@cityofsacramento.org or 916-808-8930.

300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Help Line: 916-264-5011
CityofSacramento.org/cdd

City of
SACRAMENTO
Community Development

The City appreciates the opportunity to review the NOP for the proposed SWIFT Project. City staff supports the County's implementation of zero-emission technologies and public accessible EV charging infrastructure. As this project progresses through environmental review, the City of Sacramento looks forward to continued coordination with the County. If you have follow-up questions or seek clarifications on any of the above comments, please contact me at chodge@cityofsacramento.org or 808-5971.

Sincerely,

Cheryle L. Hodge

Cheryle L. Hodge
New Growth Manager, Community Development Department

cc: Pelle Clarke, Senior Engineer, Department of Public Works
Tom Bufford, Principal Planner, Environmental Planning Services
Alison Little, Associate Planner, Sacramento County

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