Memorandum

Date: July 25, 2024

From: Jesse Yabes, Associate Civil Engineer, at the City of Rancho Cordova

Subject: **Categorical Exemption Memorandum for the City of Rancho Cordova** Pump Station Generators Project

Introduction

The City of Rancho Cordova (City) developed a project to install emergency standby generators at four of its pump stations to increase the reliability of its facilities and mitigate potential impacts due to flooding. To supplement its rate-based stormwater enterprise fund, the City applied for and received funding from the California Governor's Office of Emergency Services (CalOES) under the Hazard Mitigation Grant Program (HMGP). The HMGP is funded by the Federal Emergency Management Agency (FEMA).

As required by The National Environmental Policy Act, FEMA reviewed the City's sub-application, assessed potential impacts of the project, and provided a Record of Environmental Consideration (REC). FEMA determined the project to be covered by Categorical Exclusions N8 and N18. The FEMA REC is attached to this memorandum.

The proposed project is also subject to environmental clearance under the California Environmental Quality Act (CEQA). The purpose of this memorandum is to document existing conditions and provide recommendations for achieving environmental clearance under CEQA.

Existing Conditions

This project is located at four pump stations within Rancho Cordova, CA.

Sunriver Pump Station (38.61923489, -121.282637) is located at 10020 Yukon River Way, within a residential development.

Citrus Rd. Pump Station (38.61060377, -121.2644354) is in a commercial mixed-use area at the intersection of Citrus Rd. and Point East Dr.

West Coloma Pump Station (38.58824871, -121.3242804) is located along the north end of Rod Beaudry Dr. just south of the entrance to River Bend Park.

Mather Industrial Pump Station (38.56290828, -121.3176344) is located on a drainage easement on the property located at 10111 Old Placerville Rd. The easement is situated on the west side of the property along Routier Rd, south of Systems Pkwy.

None of the project locations are within floodplains or wetlands. Each pump station contains existing structures such as wet wells, inflow and outflow pipes, fencing, access gates and concrete pads for generator installation. Each facility contains existing equipment such as pumps, instrument panels, transfer switches, pull boxes, and electrical utility infrastructure.

Purpose and Objectives

The purpose of this project is to provide standby power systems to four existing City stormwater pump stations to ensure their reliability during an emergency. Having one permanently installed generator at each of the facilities will provide instantaneous response to utility outages. Reliable operation of the pump stations is critical to mitigating impacts to residents and businesses due to flooding. This project conforms to the Sacramento County Local Hazard Mitigation Plan.

Project Description

This project will install one 200 kW standby generator at Sunriver Pump Station and 150 kW standby generator will be installed at the other three pump stations. The dimensions (L x W x D) of the generator enclosures are approximately 17 ft by 5.5 ft by 10 ft.

Each generator set will be mounted onto a sub-base fuel tank with electrical stub-up area, double-walled secondary containment area. Engine exhaust systems, and total emissions, will meet the U.S. Environmental Protection Agency's final Tier 4 standards for diesel-fueled emergency standby generators.

Each engine-generator and fuel tank set will be installed on existing concrete pads with anchor bolts and vibration isolators. Excavation will not be required. The placement of the generators may require rigging and lifting with a truck mounted crane. Each location can be accessed from the public right-of-way, or via drainage easement. Temporary traffic control may be required during the hauling and lifting operation.

Each engine-generator set will be housed in a lockable, weather-resistant level 3 sound attenuating enclosure. Each enclosure will be furnished with a silencer to further reduce noise pollution. The silencer combined with the enclosure will limit overall noise to less than 75 dBA at 23 feet during full load operation.

Conductors and cables will be extended from the pump station control equipment to the generator pads via existing duct banks. Trenching and excavation will not be necessary. Conduit and cable will be installed from the existing pull boxes to the generator control panels.

Environmental Clearance

Categorical Exemptions (CE) under CEQA represent activities that generally do not result in significant environmental impacts and are considered exempt from detailed environmental disclosures.

The City has determined the project is exempt from CEQA Guidelines per Cal. Code Regs., tit. 14, sect. 15301 "Existing facilities which states:

> *Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to:*

> ***b)*** *Existing facilities of both investor and publicly-owned utilities used to provide electric power, natural gas, sewerage, or other public utility services;*

This project is exempt because it proposes installing new standby generators and appurtenances at the existing City-owned facilities which provide municipal drainage utility service. This project does not provide an expansion of facility use.

The City has determined the project is further exempt from CEQA Guidelines per Cal. Code Regs., tit. 14, sect. 15303 “New Construction or Conversion of Small Structures" which states:

> *Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include but are not limited to:*
>
> *d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.*

This project is exempt because it proposes installing new equipment with only minor modifications to the facilities. This project proposes to connect electrical service from the generator systems to existing equipment.

None of the exceptions to these exemptions in Section 15300.2 apply. No sensitive biological resources exist on or adjacent to the project areas. No unusual circumstances exist that would create a reasonable possibility that the project would have a significant adverse effect on the environment.

This project will require authorization to construct from Sacramento Metropolitan Air Quality Management District as new point sources will be introduced. The proposed equipment will meet Tier 4 emissions standards and will conform with the determination of SMAQMD for Best Available Control Technology for emergency standby generators. The City will follow Federal, State and Local laws during construction. The City will enforce standard environmental operating procedures to ensure that traffic, noise and dust impacts to the local community near the project sites during short-term construction activities are kept to a minimum.

Recommendations

Based on a review of the proposed project sites, CEQA guidelines and the discussion above, the proposed project would meet the requirements of a Class 1 and Class 3 categorical exemption under CEQA.

Figure 1. Regional Location