
Central Valley Regional Water Quality Control Board

17 June 2022

Scott Johnson
City of Sacramento
300 Richards Boulevards, 3rd Floor
Sacramento, CA 95811
SRJohnson@cityofsacramento.org

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, 920 SAN JUAN RESIDENTIAL DEVELOPMENT (P21-008) PROJECT, SCH#2022050458, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 20 May 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the 920 San Juan Residential Development (P21-008) Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

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

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

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

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

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

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

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

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

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

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

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

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage

under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

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

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wgo/wgo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

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

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

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



May 24, 2022

Mr. Scott Johnson
City of Sacramento – Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: Notice of Availability/ Notice of Intent to adopt a Mitigated Negative Declaration for the 920 San Juan Residential Development Project (P21-008)

Dear Mr. Johnson,

The Sacramento Regional County Sanitation District (Regional San) and the Sacramento Area Sewer District (SASD) have the following comments regarding the Notice of Intent to adopt a Mitigated Negative Declaration for the San Juan Residential Development Project.

The San Juan Residential Development project site is a 9.17-acre site located within the northern portion of the City of Sacramento. The triangular site consists of two parcels and is situated within San Juan Road, an existing drainage ditch, and the Natomas Point Apartments. Within this parcel is an existing concrete-lined drainage ditch, an existing 15” sanitary sewer gravity main, and a SMUD high voltage power line easement. The majority of the parcel is undeveloped with the intention to develop a residential community.

Local sanitary sewer service for the proposed project site will be provided by the SASD local sewer collection system. Ultimate conveyance of wastewater from the SASD collection system to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment and disposal will be provided by the Regional San interceptor system.

In order to receive sewer service, the project proponent must complete a Sewer Master Plan that includes connection points and phasing information to assess the capacity of the existing sewer system to accommodate the additional flows generated by this project.

In February 2013, the Regional San Board of Directors adopted the Interceptor Sequencing Study (ISS). The ISS updated the Regional San Master Plan 2000. The ISS is located on the Regional San website at www.regionalsan.com/ISS.

In March 2021, the SASD Board of Directors approved the most current SASD planning document, the 2020 System Capacity Plan Update (SCP). The SCP is located on the SASD website at www.sacsewer.com/devres-standards.html.

Main Office

10060 Goethe Road
Sacramento, CA 95827-3553
Tel: 916.876.6000
Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tel: 916.875.9000
Fax: 916.875.9068

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Chief Financial Officer

Nicole Coleman

Public Affairs Manager

www.regionalsan.com

Mr. Scott Johnson
May 24, 2022
Page 2

Regional San and SASD are not land-use authorities. Regional San and SASD plans and designs its sewer systems using information from land use authorities. Regional San and SASD base the projects identified within its planning documents on growth projections provided by these land-use authorities. Onsite and offsite environmental impacts associated with extending sewer services to this development should be taken into account within the Initial Study/Mitigated Negative Declaration (IS/MND) as well as the Mitigation Monitoring Program (MMP).

Customers receiving service from Regional San and SASD are responsible for rates and fees outlined within the latest Regional San and SASD ordinances. Fees for connecting to the sewer system recover the capital investment of sewer and treatment facilities that serves new customers. The SASD ordinance is located on the SASD website at www.sacsewer.com/ordinances and the Regional San ordinance is located on the Regional San website at www.regionalsan.com/ordinance.

If you have any questions regarding this letter, please feel free to contact me at (916) 876-5070 or by email at gillespie@sacsewer.com.

Sincerely,

Allyson Gillespie

Allyson Gillespie
Regional San Development Services

cc: SASD Development Services



10060 Goethe Road
Sacramento, CA 95827-3553
Tel 916.876.6000
Fax 916.876.6160
www.sacsewer.com

June 13, 2022

Daniel Abbes
City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: 920 San Juan – NOA/NOI
APN: 250-0010-083; -085
File No.: P21-008

Dear Mr. Abbes,

The applicant is requesting a Notice of Availability / Notice of Intent (NOA/NOI) to Adopt a Mitigated Negative Declaration (MND) for the 920 San Juan Residential Development Project (Project). The project would develop a residential community of 79 homes, private streets and alleys, open space, tot lot, and drainage basins, with associated landscaping and infrastructure. Parking spaces would include 158 spaces in garages, and 37 uncovered spaces. Proposed dwelling units would range in size from 1,200 to 1,500 square feet. The proposed project would include: a General Plan Amendment from Suburban Neighborhood Low Density (SNLD) to Suburban Neighborhood Medium Density (SNMD); a Rezone from Agriculture (A) to Multi-Unit Dwelling (R-2B); a tentative map that would subdivide the property into 79 single family residential lots, Site Plan and Design Review to construct 79 dwelling units; and a conditional use permit (CUP) for a gated community. Each lot would be developed with a single detached dwelling.

The Sacramento Area Sewer District (SASD) has reviewed the subject documents. We expect that if the Project is subject to currently established policies, ordinances, fees, and to conditions of approval, then mitigation measures within the EIR will adequately address the sewage aspects of the project. We anticipate a less than significant impact to the sewage facilities due to mitigation, however an encroachment permit may be required.

If you have any questions regarding these comments, please call me at (916) 876-6336.

Sincerely,

Yadira Lewis

Yadira Lewis
SASD Development Services

www.sacsewer.com

Board of Directors

Representing:

County of Sacramento | City of Citrus Heights
City of Elk Grove | City of Folsom
City of Rancho Cordova | City of Sacramento

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District Engineer

Rosemary Clark
Director of Operations

Mike Huot
Director of Policy & Planning

Matthew Doyle
Director of Internal Services

Masiku Tapa Banda
Director of Finance

Nicole Coleman
Director of Communications

From: [LU Project Review Account](#)
To: [Scott Johnson](#)
Cc: [Ron Bess](#); [Paul Philley](#); [Karen Huss](#)
Subject: RE: 920 San Juan Residential Development (P21-008) CEQA Notice of Availability / Notice of Intent to Adopt an MND
Date: Friday, June 17, 2022 11:08:30 AM
Attachments: [image001.png](#)
[image002.png](#)

Dear Scott Johnson & Ron Bess:

Thank you for providing Sac Metro Air District with the Mitigated Negative Declaration (MND) for the 920 San Juan Residential Development project for comment. Sac Metro Air District commends this project because it is relatively compact infill residential development directly on a Sacramento Regional Transit line, near a major bikeway, with good pedestrian design features. This type of development is associated with reduced motor vehicle miles traveled and resulting polluting emissions. It supports state and regional plans to reduce polluting motor vehicle emissions, including the Sacramento region's [Metropolitan Transportation Plan](#) and Sac Metro Air District's [Sacramento Regional Ozone Attainment Plan and other plans for meeting federal and state air quality standards](#).

We have two comments on the MND construction analysis:

- We note that Mitigation Measure AQ-2 requires that an equipment inventory and a Certification Statement be provided for documentation of compliance and for future review by Sac Metro Air District "as necessary." Sac Metro Air District recommends modifying this measure so that it requires an equipment inventory and Certification Statement be provided for documentation of compliance and for review by Sac Metro Air District prior to the start of construction, and at the completion of construction.
- Please clarify which Tier applies for compliance alternative 3. Table 3.36, column 2, row 3, currently reads only "Tier."

Please let me know if you have any questions about this.

Best Regards,

Molly Wright

Air Quality Planner/Analyst

Desk: (279) 207-1157

mwright@airquality.org

www.AirQuality.org



SACRAMENTO METROPOLITAN



From: Scott Johnson <SRJohnson@cityofsacramento.org>

Sent: Friday, May 20, 2022 3:11 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Daniel Abbes <DAbbes@cityofsacramento.org>; Garrett Norman <GNorman@cityofsacramento.org>

Subject: 920 San Juan Residential Development (P21-008) CEQA Notice of Availability / Notice of Intent to Adopt an MND

***** THIS EMAIL ORIGINATED OUTSIDE
AIRQUALITY.ORG *****

Good Afternoon,

This email is to inform you that the City of Sacramento, Community Development Department, as Lead Agency, has issued a **Notice of Availability / Notice of Intent (NOA/NOI) to Adopt a Mitigated Negative Declaration (MND) for the 920 San Juan Residential Development Project (P21-008)** (attached).

The draft mitigated negative declaration is now available for public review and comment. The comment period is from **May 20, 2022 through June 20, 2022**.

The NOA/NOI is available, along with the Mitigated Negative Declaration at the City's Community Development Department EIR webpage at:

<http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>

Comments are invited from all interested parties. Written comments regarding the Draft Mitigated Negative Declaration should be received by the Community Development Department, **NO LATER THAN 5:00 p.m. on Monday, June 20, 2022**. All comments should be submitted via email or mailed to:

Scott Johnson, Senior Planner
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
Email: srjohnson@cityofsacramento.org
Tel: (916) 808-5842

Thank you.

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor

Sacramento, CA 95811

(916) 808-5842

srjohnson@cityofsacramento.org

From: [PGE Plan Review](#)
To: [Scott Johnson](#)
Cc: [Daniel Abbes](#); [Garrett Norman](#)
Subject: RE: 920 San Juan Residential Development (P21-008) CEQA Notice of Availability / Notice of Intent to Adopt an MND
Date: Friday, May 27, 2022 9:42:48 AM
Attachments: [image001.png](#)
[Initial Response Letter 5-27-2022.pdf](#)

Good Morning Scott,

Thank you for submitting the 920 San Juan Residential Development (P21-008) plans. The PG&E Plan Review Team is currently reviewing the information provided. Should this project have the potential to interfere with PG&E's facilities, we intend to respond to you with project specific comments on or prior to the provided deadline. Attached is some general information when working near PG&E facilities that must be adhered to when working near PG&E's facilities and land rights.

This email and attachment does not constitute PG&E's consent to use any portion of PG&E's land rights for any purpose not previously conveyed. If there are subsequent modifications made to your design, we ask that you resubmit the plans to the email address listed below.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Thank you,



**Pacific Gas and Electric Company
Plan Review Team**

Email: pgeplanreview@pge.com

Click here to access the [PG&E Greenbook](#)

Click here to [Submit an Application](#)

Click here to access [Customer Connections Online](#)

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Friday, May 20, 2022 3:11 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Daniel Abbes <DAbbes@cityofsacramento.org>; Garrett Norman <GNorman@cityofsacramento.org>
Subject: 920 San Juan Residential Development (P21-008) CEQA Notice of Availability / Notice of Intent to Adopt an MND

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

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300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
Email: srjohnson@cityofsacramento.org
Tel: (916) 808-5842

Thank you.

Scott Johnson
City of Sacramento
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srjohnson@cityofsacramento.org



May 27, 2022

Scott Johnson
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Ref: Gas and Electric Transmission and Distribution

Dear Scott,

Thank you for submitting 920 San Juan Residential Development (P21-008) plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch



wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [$24/2 + 24 + 36/2 = 54$] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible ($90^\circ \pm 15^\circ$). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.



11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as **"RESTRICTED USE AREA – NO BUILDING."**
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&E's facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.



8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



June 20, 2022

VIA EMAIL

Daniel Abbes
City of Sacramento, Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: 920 San Juan Residential Development (P21-008)

Dear Daniel Abbes:

Thank you for providing Civic Thread the opportunity to comment on the 920 San Juan Residential Development. The project proposes to construct a housing development featuring 79 single unit and duplex-dwelling residential units, a detention basin, and outdoor gathering spaces. The site is located at 920 San Juan Road in South Natomas and currently stands as a 9.17-acre vacant lot.

We appreciate the project team's efforts to incorporate many of the comments our organization submitted during the first application round in May 2021 in support of a more active transportation-oriented development. We believe this project has great potential to contribute to the medium density housing stock in South Natomas and would like to reinstate the following recommendations:

- **Install signalized crossings at the proposed driveway location and at the Niños Parkway Trail.** The center lane between the trail heads may be an ideal location for a two-stage signalized crossing using the median area for a protected refuge island. At the intersection recommended for the site's main entrance, a crosswalk may be needed on both the east and west sides of the driveway. Safe crossings will not only improve the safety of residents accessing the range of amenities south of San Juan Road, but will also better position the roadway for future Regional Transit stops.
- **Ensure driveways include high visibility pedestrian and cyclist facilities** to alert drivers to active mode users, such as conflict striping, Rectangular Rapid Flashing Beacons, re-striping existing bicycle lanes, etc.

- **Close remaining sidewalk gaps along internal private streets.** Sidewalks significantly improve pedestrian safety, particularly for vulnerable users such as children. The 920 San Juan Residential Development will likely house many young families given the single unit and duplex-dwelling units, proximity to local schools, and proposed on-site amenities like the “Tot-Lot.”
- **Consider incorporating shade trees into the landscaping scheme.** While the proposed landscape plans meet the City’s minimum gallon size for parking lots, adding shade trees throughout the development will create a more comfortable pedestrian environment for residents, particularly during Sacramento’s hotter months.¹ Creating more shade also contributes to reducing the [urban heat island effect](#).

Additional recommendations we would like to propose in support of a healthier, more environmentally friendly South Natomas include:

- **Create a secondary pedestrian entrance on the west side of the development** to establish direct access to the City of Sacramento’s future addition to the Niños Parkway (construction estimated to begin Spring 2022).²
- **Ensure new construction and parking infrastructure meet the City of Sacramento’s [New Building Electrification Ordinance](#) and [Electric Vehicle Infrastructure Requirements](#)** should construction begin after January 1, 2023.

Development projects that lead to more walking and active travel are critical to our community’s future. Civic Thread is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling. The benefits include improved public health and physical fitness, better air quality, a stronger sense of cohesion and safety in neighborhoods, and more sustainable communities and local economies.

Thank you for the opportunity to provide comments. Should you have any questions, please don’t hesitate to reach out to me at jgrimaldi@civicthread.org.

Please notify Civic Thread of future routings or notices for this project.

¹ “PARKING LOT TREE SHADING DESIGN AND MAINTENANCE GUIDELINES” (City of Sacramento): [https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Maintenance-Services/ShadingGuidelines2003-\(1\).pdf](https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Maintenance-Services/ShadingGuidelines2003-(1).pdf)

² Item 5: “Report to Active Transportation Commission” (City of Sacramento): https://sacramento.granicus.com/MetaViewer.php?view_id=21&clip_id=4954&meta_id=630473

Sincerely,

Jordan Grimaldi

Project Manager, Civic Thread