

# **CALIFORNIA TRUCK & TRAILER REPAIR PROJECT (P21-002)**

## **MITIGATED NEGATIVE DECLARATION COMMENTS, REPOSSES, & REVISION ERRATA**

Prepared by

**City of Sacramento**  
**Community Development Department**  
300 Richards Boulevard, 3rd Floor  
Sacramento, CA 95811  
Attn: Ron Bess, Environmental Planner

With technical support from

**HELIX Environmental Planning, Inc.**  
11 Natoma Street, Suite 155  
Folsom, California 95630

November 2022

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## SECTION 1: INTRODUCTION

The City of Sacramento (City), as lead agency, released the Initial Study/Mitigated Negative Declaration (IS/MND) for the California Truck & Trailer Repair Project (P21-002) at 121 Morrison Avenue (project) for public review from August 17, 2022 to September 16, 2022, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15105. The IS/MND and supporting documents are available at the City of Sacramento, Community Development Department, located at 300 Richards Boulevard, 3rd Floor, Sacramento, California 95811 and at the Sacramento Public Library's Central Branch, located at 828 I Street, Sacramento, California 95814. The IS/MND is also available online at <https://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

According to State CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the IS/MND. However, unlike the process followed with an Environmental Impact Report (EIR), comments received on an IS/MND are not required to be attached to the IS/MND, nor must the lead agency make specific written responses to public agencies. Nonetheless, the lead agency has chosen to provide responses to the comments received during the public review process for the IS/MND, as well as revisions to the IS/MND where necessary.

This document is organized into three sections:

- **Section 1: Introduction**
- **Section 2: Responses to Written Comments:** Provides a list of the agencies, organizations, and individuals who commented on the Draft IS/MND. Copies of all of the letters received regarding the Draft IS/MND and responses thereto are included in this section.
- **Section 3: Revisions to Public Review Draft IS/MND:** Includes a listing of refinements and clarifications on the Public Review Draft IS/MND, which have been incorporated.

The Final IS/MND includes the following contents:

- IS/MND (provided under separate cover)
- IS/MND Appendices (provided under separate cover)
- Responses to Written Comments and Revisions to IS/MND (Sections 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

## SECTION 2: RESPONSES TO WRITTEN COMMENTS

### 2.1 INTRODUCTION

In accordance with State CEQA Guidelines Section 15088, the City, as the lead agency, evaluated the comments received on the IS/MND for the California Truck & Trailer Repair Project and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final IS/MND for the project in accordance with State CEQA Guidelines Section 15132.

### 2.2 LIST OF COMMENTERS

The City received seven (7) comment letters on the IS/MND during the 30-day comment period from August 17, 2022 to September 16, 2022. Following this list, the text of the communications are reprinted and followed by the corresponding responses. Individual comments within the letters have been bracketed and numbered so comments can be cross-referenced with responses. The seven (7) comment letters are as follows:

<b>Commenter</b>	<b>Author Code</b>
California Department of Transportation–District 3, dated September 9, 2022.....	Caltrans
Central Valley Regional Water Quality Control Board, dated September 16, 2022.....	CVRWQCB
Pacific Gas and Electric, dated September 6, 2022 .....	PG&E
Pacific Gas and Electric, dated October 4, 2022 .....	PG&E
Mabel Bunn, dated September 13, 2022.....	Mabel Bunn
Robert Armstrong, dated August 22, 2022.....	Robert Armstrong
Sacramento Metropolitan Air Quality Management District, dated September 16, 2022.....	SMAQMD

### 2.3 RESPONSES TO COMMENTS

The bracketed and numbered comment letters are reproduced in the following pages. Each of the comments addressed the project site and conditions as they relate to the particular areas of concern of the respective commenting agency. The comments are acknowledged by the City and have been considered as part of the project planning and its implementation.

CALIFORNIA TRUCK & TRAILER REPAIR PROJECT (P21-002)  
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

**2.3.1 Letter A: California Department of Transportation–District 3, September 9, 2022**

Letter A

**From:** [Healy, Angelina R@DOT](mailto:Healy_Angelina_R@DOT)  
**To:** [Ron Bess](mailto:Ron Bess)  
**Cc:** [Arnold, Gary S@DOT](mailto:Arnold, Gary_S@DOT)  
**Subject:** Caltrans District 3 LDR Response: California Truck & Trailer Repair Project (P21-002)  
**Date:** Friday, September 9, 2022 12:19:07 PM

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Hello,

Thank you for including the California Department of Transportation (Caltrans) in the review process of the CA Truck & Trailer Repair Project. We wanted to reach out and let you know we have no comments at this time.

Please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project. Should you have questions regarding these comments or require additional information, please contact me, Local Development Review, Equity and System Planning Coordinator, by phone (530) 790-8138 or via email at [D3.local.development@dot.ca.gov](mailto:D3.local.development@dot.ca.gov).

A-1

Thank you!

**Angelina Healy**

Local Development Review, Equity & System Planning  
Equity Lead & Native American Liaison

Work Cell: (530) 790-8138  
Email: [angelina.healy@dot.ca.gov](mailto:angelina.healy@dot.ca.gov)  
Schedule: 6am - 3:30pm, M-F (Friday as rotating day off)  
DPLAS | Caltrans – District 3  
703 B Street | Marysville, CA 95901



**Response to Caltrans Comment A-1**

The commenter provided an email during the public response period and no comments were made regarding the project. No further response is warranted.

**2.3.2 Letter B: Central Valley Regional Water Quality Control Board, September 16, 2022**



Letter B

Central Valley Regional Water Quality Control Board

16 September 2022

Ron Bess  
City of Sacramento  
300 Richards Boulevard, 3rd Floor  
Sacramento, CA 95811  
[Rbess@cityofsacramento.org](mailto:Rbess@cityofsacramento.org)

**COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, CALIFORNIA TRUCK AND TRAILER REPAIR PROJECT (P21-002), SCH#2022080369, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 17 August 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 California Truck and Trailer Repair Project (P21-002), 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.

B-1

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

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

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

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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/](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](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:

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

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

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

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

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

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

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

**Industrial Storm Water General Permit**

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

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

**Clean Water Act Section 404 Permit**

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

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



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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/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

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

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

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

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low 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

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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](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](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](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

## Response to CVRWQCB Comment B.1

The commenter provided a standard response form letter during the public response period. A summary of the CVRWQCB's standard requirements related to water quality relations and permitting were provided and no comments specifically addressing the adequacy of the IS/MND were made. The applicant will coordinate with the CVRWQCB to obtain permits, as necessary.

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2.3.3 Letter C: Pacific Gas & Electric, September 6, 2022



Plan Review Team  
Land Management

PG&EPlanReview@pge.com

Letter C

September 6, 2022

Ron Bess  
City of Sacramento  
300 Richards Blvd, 3<sup>rd</sup> Flr  
Sacramento, CA 95811

Ref: Gas and Electric Transmission and Distribution

Dear Ron Bess,

Thank you for submitting the P21-002 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](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.

C-1

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

## Response to PG&E Comment C.1

The commenter provided a standard response form letter during the public response period. The applicant will incorporate requirements as it relates to gas facilities and electric facilities. No further response is warranted.

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2.3.4 Letter D: Pacific Gas & Electric, October 4, 2022



Plan Review Team  
Land Management

PGEPlanReview@pge.com Letter D

October 4, 2022

Ron Bess  
City of Sacramento  
300 Richards Blvd, 3rd Flr  
Sacramento, CA 95811

Re: California Truck & Trailer Repair Project P21-002

Dear Ron:

Thank you for giving us the opportunity to review the subject plans. The proposed California Truck & Trailer Repair Project is within the same vicinity of PG&E's existing facilities that impact this property.

The proposed California Truck & Trailer Repair Project proposes landscaping within the area of an existing 12.5' Public Utility Easement (PUE) over the subject parcel. PG&E operates and maintains an existing gas distribution main within said PUE. Any landscaping installed within said PUE must maintain a 5' horizontal clearance from PG&E's existing gas distribution main. Invasive roots from trees, brush and vegetation may cause unintended damage to the gas distribution main and may result in a significant safety hazard.

D-1

Please contact the Building and Renovation Center (BRSC) for facility map requests by calling 1-877-743-7782 and PG&E's Service Planning department at [www.pge.com/cco](http://www.pge.com/cco) for any modification or relocation requests, or for any additional services you may require.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact me at [Justin.Newell@pge.com](mailto:Justin.Newell@pge.com).

Sincerely,

Justin Newell  
Land Management  
916-594-4068

## Response to PG&E Comment D.1

The commenter states that proposed landscaping within the public utility easement located on the project site should maintain a 5-foot horizontal clearance from PG&E's existing gas distribution main. The City has reviewed the applicant's proposed landscape plans and has determined that the 5-foot horizontal clearance requirement would be met.

2.3.5 Letter E: Mabel Bunn, September 13, 2022

Letter E

Mr. Ron Bass  
Community Development Dept.  
300 Richards Blvd.  
Sacramento, Ca. 95811

Project: Ca. Truck & Trailer Repair (P21-002)

Dear Sir:

I have lived on Morrison Ave since 1968.  
Have no problem with a two story repair  
facility with an administration office  
building going up. It has done concerned  
me though is traffic. Morrison Ave is  
not equipped to handle heavy trucks.  
The ~~street~~ street is very narrow. I would  
hope that Harris Ave. would handle the  
traffic - a sign should be constructed  
& placed on Morrison stating residential  
no trucks or the like. I know all to well  
about your landscaping promise. The promise  
we neighbors got that the brick wall going up  
facing us would be landscaped. It took forever  
just to get them to cut the weeds  
Mabel Bunn

Response to Mabel Bunn Comment E.1

**Response to Mabel Bunn letter on California Truck and Trailer Repair Project  
(P21-002)**

Thank you for participating in the public review process of the IS/MND. The commenter states that the street is very narrow and requests a sign is put in place to prohibit heavy trucks on Morrison Avenue. The comment does not address the adequacy of the IS/MND, has been noted for the record, and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

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2.3.6 Letter F: Robert Armstrong, August 22, 2022

Letter F

**From:** [Armstrong, Robert](#)  
**To:** [Ron Bess](#); [Angel Anguilano](#); [Garrett Norman](#)  
**Cc:** [Scott Johnson](#)  
**Subject:** RE: Notice of Availability/Intent for the California Truck & Trailer Repair Project (P21-002)  
**Date:** Monday, August 22, 2022 9:11:12 AM  
**Attachments:** [California Truck and Trailer Repair\\_P21-002\\_NOA\\_MND\\_20220822.pdf](#)

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Good Morning Ron,

Please find the attached response letter from Regional San pertaining to the above-mentioned project. The "Wastewater" section will need to be revised to accurately reflect the City as the local sewer service provider for the entire project area and not SASD.

*"The Sacramento Area Sewer District (SASD) and the Sacramento Regional County Sanitation District (SRCSD) provide wastewater and treatment services for the area in which the project site is located. The City of Sacramento provides wastewater collection for approximately two-thirds of the area within the City limits. Wastewater generated in the vicinity of the project site is collected in the County's system through a series of sewer pipes and pump stations or through gravity flow. Once collected in the County's system, sewage flows into the SRCSD interceptor system, where the sewage is conveyed to the Sacramento Regional Wastewater Treatment Plant. The SASD is responsible for providing sewage service to the project site. The City's Department of Utilities is responsible for providing and maintaining water, storm drainage, and flood control services for residents and businesses within the City limits"*

F-1

Feel free to contact me with any questions.

Best Regards,

Robb

**Robb Armstrong**  
*Principal Engineering Technician*

Regional San – Development Services & Plan Check  
10060 Goethe Road  
Sacramento, CA 95827  
Phone: (916) 876-6104  
Email: [armstrongro@sacsewer.com](mailto:armstrongro@sacsewer.com)  
[www.regionalsan.com](http://www.regionalsan.com)



Please consider the environment before printing this email.

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**From:** Ron Bess <[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)>  
**Sent:** Wednesday, August 17, 2022 7:46 AM

## Response to Robert Armstrong F.1

The commenter requests revisions to Section 14: Utilities and Service Systems, under *Wastewater* (see page 87), to accurately reflect the City as the local sewer provider for the entire project area and not the Sacramento Area Sewer District (SASD). As described in Section 3.3 below, the IS/MND has been revised to accurately reflect the City as the local sewer provider for the entire project area.

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2.3.7 Letter G: Sacramento Metropolitan Air Quality Management District,  
September 16, 2022

Letter G

**From:** [LU Project Review Account](#)  
**To:** [Ron Bess](#); [Angel Angulano](#); [Garrett Norman](#)  
**Cc:** [Scott Johnson](#)  
**Subject:** RE: 9/16 Notice of Availability/Intent for the California Truck & Trailer Repair Project (P21-002)  
**Date:** Friday, September 16, 2022 3:53:59 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Good Afternoon Ron,

Thank you for providing Sac Metro Air District with this MND for review. Originally, another staffer here was assigned to comment on it, but she had an unplanned extended absence, so I have reviewed it and am offering comments based on a review that is shorter than our customary review, as follows:

1. The MND incorporates greenhouse gas emissions analysis into the air quality analysis, under the rubric of its CEQA checklist Question H, "Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?" MND Table 3 appears to identify the Sac Metro Air District threshold of significance for greenhouse gas emissions as 1,100 metric tons of CO<sub>2</sub> equivalent per year. Please note that threshold is superseded by a [new performance-based thresholds for climate impacts](#). The new threshold requires that projects incorporate Best Management Practices (BMPs) to claim that climate impacts are less than significant under CEQA. **Sac Metro Air District recommends that the MND include as mitigation measures the Tier 1 BMPs from our thresholds of significance, to ensure that climate impacts are less than significant. These BMPs are (1) No natural gas: Projects shall be designed and constructed without natural gas infrastructure, and (2) Electric vehicle ready: Projects shall meet the current CalGreen Tier 2 standards, except all EV Capable spaces shall instead be EV Ready.** G-1
2. The MND uses Sac Metro Air District's non-zero thresholds of significance for particulate matter emissions, and under our thresholds of significance, use of the non-zero thresholds requires implementation of our [Basic Construction Emission Control Practices](#) (BCECP), available on our website. **We recommend that the MND explicitly include Sac Metro Air District BCECP as a mitigation measure.** G-2
3. Due to the nature of its use, the project will experience heavy duty truck traffic. It is also located near multiple sensitive receptors, including residences across the street and a school for children. A thorough evaluation of toxic air contaminant (TAC) impacts on those receptors is therefore important. The MND indicates that TAC exposure would be significant if exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources.
  - a. Operational Impacts: Due to the nature of the use, heavy-duty truck repair, the project has potential to result in [Toxic Air Contaminant \(TAC\)](#) emissions including diesel particulate matter that could pose an increased health risk to nearby residences. TACs can cause long-term health effects such as cancer, congenital disabilities, neurological damage, or genetic damage; or short-term acute effects such as eye-watering, respiratory irritation (such as a cough), running nose, throat pain, and headaches. The Sac Metro Air District recommends the following measures to help reduce exposure to heavy-duty truck emissions:
    - Incorporate shrub and tree species selected from Sac Metro Air District's [Landscaping Guidance for Improving Air Quality Near Roadways](#) (Landscaping Guidance) in the planting strips along the southern perimeter (mindful of the



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overhead utilities) to reduce as much emissions exposure as possible to neighboring residential uses. Plantings should be as tightly spaced as the species allow.

- Accommodate low- and zero-emission heavy-duty electric truck technology to the greatest extent possible by providing zero-emission heavy-duty electric truck infrastructure. California Air Resources Board programs can provide incentive funds for both vehicles and infrastructure, including the [Carl Moyer Program](#) and the [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project](#). You may contact Sac Metro Air District staff at 800-880-9025 for more information on local incentive funding opportunities.
  - Although the State's anti-idling regulations (CCR Title 13, Division 3, [Chapter 9, Article 4.8, §2449\(d\)\(2\)](#) and [Chapter 10, Article 1, §2485](#)) provide exemptions to the 5-minute idling limitation for truck activities involving testing, servicing, repairing and diagnostic purposes, Sac Metro Air District recommends the applicant prominently post signage informing project users to minimize idling time for diesel-powered equipment and vehicles by shutting them off when not in use and reducing idling time to 5 minutes or as much as feasible while performing exempt activities.
- b. Construction Impacts. The MND claims that "The only significant source of TACs on the project site would be DPM [diesel particulate matter] from off-road equipment during construction and from trucks idling and circulating on the project site during long-term operation. Due to the small size of the project, short duration of construction, and intermittent nature of constructions activities, construction of the project would not result in substantially increased health risks due to prolonged exposure to concentrations of DPM." For full public disclosure, we recommend that the MND include information to allow the reader to assess the verity of the statements about construction activity here. Specifically, we recommend that it include a clear delineation of the type of construction activities that will occur and the emissions sources associated with those activities. This may include the number and types of equipment anticipated to be used during construction, and the timing, phasing, and duration of construction.

G-4

This concludes our comments on this MND. Please let me know if you have any questions about them. As a reminder, all projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction. Please visit our website to [find a list of the most common rules that apply at the construction phase of projects](#).

If you have further questions, please reach out to Molly Wright at [mwright@airquality.org](mailto:mwright@airquality.org).

Thank you,

**Paul Philley, AICP**  
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## **Response to SMAQMD G.1**

To ensure the SMAQMD's recommended Tier 1 GHG reductions Best Management Practices (BMPs) are implemented, the City will require Tier 1 BMP1, no natural gas, and Tier 1 BMP2, electric vehicle ready, as conditions of approval. In addition, the City has adopted an amendment to Title 15 of the Sacramento City Code. Building permit applications filed on or after January 1, 2023, for newly constructed buildings that are three stories or less are required to be all-electric buildings. See the errata to Section 2, Air Quality, of the ISMND, below.

## **Response to SMAQMD G.2**

To ensure the SMAQMD's recommended Basic Construction Emissions Control Practices (BCECPs) are implemented, the City will require the BCECPs as conditions of approval. See the errata to Section 2, Air Quality, of the ISMND, below.

## **Response to SMAQMD G.3**

To evaluate potential health risks to nearby sensitive receptors resulting from emissions of diesel particulate matter (DPM) from trucks traveling to and from and operating on the project site, a project health risk assessment (HRA) was completed. The results of the HRA are presented under the heading "Question G" on pages 22 to 24 of the IS/MND. The full methodology and results discussion, including modeling input and output, is included in Appendix B to the IS/MND. As discussed on page 23 of the IS/MND, the maximum incremental increased cancer risks, and maximum non-cancer chronic and acute hazard index due to exposure to DPM from long term operation of the project would not exceed the SMAQMD thresholds and the project would have no additional significant environmental effects beyond what has been previously identified in the Master EIR. No revisions to the IS/MND are warranted.

## **Response to SMAQMD G.4**

The complete description of construction activities, construction schedule and activity durations, and anticipated construction equipment use is included in the AQ/GHG assessment letter, Appendix B to the IS/MND. To inform the reader where such construction details can be found, a sentence has been added to the text of the IS/MND, see the errata to Section 2, Air Quality, of the ISMND, below.

## SECTION 3: REVISIONS TO IS/MND

### 3.1 OVERVIEW

This document presents, in ~~striketrough~~ and double-underline format, the revisions to the IS/MND for the California Truck & Trailer Project. The revisions to the IS/MND do not affect the adequacy of the environmental analysis or conclusions in the IS/MND. As the changes presented below would not result in any new significant impacts or an increase in impact significance from what was identified in the IS/MND, recirculation of the IS/MND is not required (State CEQA Guidelines Section 15073.5).

Based on the comments received on the IS/MND prepared for the proposed project (released for public review on August 17, 2022), as well as staff-initiated changes, the following revisions have been made to the IS/MND.

### 3.2 SECTION 2 AIR QUALITY

In response to Letter G, Sacramento Metropolitan Air Quality Management District Comment G.1, the following text would be added under the “*Standards of Significance*” heading on page 20 of the IS/MND, and under the heading “*Question H*” on page 24 of the IS/MND:

#### Standards of Significance

A project would be considered to have a significant effect relating to greenhouse gas emissions if it conflicts with the City’s 2035 General Plan policies and programs supporting the City’s GHG reduction targets, and if the project would result in construction or operational GHG emissions exceeding the SMAQMD’s threshold of 1,100 MT CO<sub>2e</sub> per year. For all projects, regardless of project GHG emission levels, the SMAQMD requires implementation of Tier 1 Best Management Practices (BMPs; SMAQMD 2020b):

- BMP 1 - projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 - projects shall meet the current CalGreen Tier 2 standards, except all electric vehicle capable spaces shall instead be electric vehicle ready.

#### Question H

As discussed above, the project would not conflict with, or obstruction implementation of, any policies or programs identified in the City’s 2035 General Plan as supporting attainment of the City’s GHG reduction goals. As shown in Table 2, the project’s construction and operational GHG emissions would not exceed the SMAQMD’s threshold. The following BMPs recommended by SMAQMD for the reduction of GHGs would be implemented as conditions of approval:

- BMP 1 - projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 - projects shall meet the current CalGreen Tier 2 standards, except all electric vehicle capable spaces shall instead be electric vehicle ready.

Therefore, the project would not conflict with an applicable GHG reduction plan, policy, or regulation and the project would **have no additional significant environmental effects** beyond what has been previously identified in the Master EIR.

In response to Letter G, Sacramento Metropolitan Air Quality Management District Comment G.2, the following text would be added under the “*Question C*” heading on page 21 of the IS/MND:  
The pollutants of primary concern in Sacramento County are those related to the NAAQS and CAAQS nonattainment designations discussed above: NO<sub>x</sub> and ROG (because they are ozone precursors), PM<sub>10</sub>

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and PM<sub>2.5</sub>. As discussed in questions A and B, above, and question D, below, construction and operation of the project would not result in emissions in excess of the SMAQMD thresholds which were developed to ensure that a development project's contribution to regional air quality would not result in a new air quality standard violation or result in a cumulatively considerable contribution to an existing air quality violation. Because Sacramento County is in nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, SMAQMD requires the implementation of the following Basic Construction Emission Control Practices (BCECPs), regardless of the project's significance determination under CEQA (SMAQMD 2021), these BCECPs would be implemented as conditions of approval:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads;
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered;
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited;
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph);
- All roadways, driveways, sidewalks, and parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- Minimize idling time by either shutting equipment off when not in use or reducing time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Therefore, the project would have ***no additional project-specific environmental effects*** beyond what has been previously identified in the Master EIR.

In response to Letter G, Sacramento Metropolitan Air Quality Management District Comment G.4, the following text would be added under the "Question G" heading on pages 22-23 of the IS/MND:

The only significant source of TACs on the project site would be DPM from off-road equipment during construction and from trucks idling and circulating on the project site during long-term operation. Due to the small size of the project, short duration of construction, and intermittent nature of construction activities, construction of the project would not result in substantially increased health risks due to prolonged exposure to concentrations of DPM. A complete description of project construction activities, construction schedule, and anticipated construction equipment use is provided in the AQ/GHG assessment letter (see Appendix B). A health risk assessment was conducted to determine the long-term community health risks associated with exposure to DPM from operation of the project, as described in the AQ/GHG assessment letter (see Appendix B).

### 3.3 SECTION 14 UTILITIES AND SERVICE SYSTEMS

In response to Letter F, Robert Armstrong Comment F.1, the following text would be removed and added under the "Wastewater" heading on page 87 of the IS/MND.

~~The Sacramento Area Sewer District (SASD) City of Sacramento Department of Utilities and the Sacramento Regional County Sanitation District (SRCSD) provide wastewater and treatment services for the area in which the project site is located. The City of Sacramento provides wastewater collection for approximately two-thirds of the area within the City limits. The project site is located within sewer basin 87 and sewer basin 85. Wastewater generated in the vicinity of the project site is collected in the ~~County's~~ City's system through a series of sewer pipes and pump stations or through gravity flow. Once collected in the ~~County's~~ City's system, sewage flows into the SRCSD interceptor system, where the sewage is conveyed to the Sacramento Regional Wastewater Treatment Plant. The ~~SASD~~ City of Sacramento Department of Utilities is responsible for providing sewage service to the project site. ~~The City's~~~~

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~~Department of Utilities~~ and is responsible for providing and maintaining water, storm drainage, and flood control services for residents and businesses within the City limits.