

**RALEY BOULEVARD AND DIESEL DRIVE WAREHOUSES
PROJECT (DR21-268)
MITIGATED NEGATIVE DECLARATION
COMMENTS, RESPONSES, & REVISION ERRATA**

Prepared for

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

Prepared by

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SWCA Project No. 69489

October 2022

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Attachments

Attachment 1 – Updated CalEEMod Outputs (replaces Appendix B of the Public Review Draft IS/MND)

SECTION 1. INTRODUCTION

The City of Sacramento (City), as lead agency, released the Initial Study/Mitigated Negative Declaration (Public Review Draft IS/MND) for the Raley Boulevard and Diesel Drive Warehouses Project (DR21-268) at 4450 Raley Boulevard (project) for public review from June 21 to July 20, 2022, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15105. The Public Review Draft 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 Public Review Draft 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 written responses to the comments received during the public review process for the Public Review Draft IS/MND for the Raley Boulevard and Diesel Drive Warehouses Project, as well as revisions to the Public Review Draft IS/MND where necessary.

This document is organized into three sections and includes one updated attachment as follows:

- **Section 1: Introduction**
- **Section 2: Responses to Written Comments:** Provides a list of the agencies, organizations, and individuals who commented on the Public Review Draft IS/MND. Bracketed copies of all letters received regarding the Public Review Draft IS/MND, and written responses 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.
 - **Attachment 1: Updated CalEEMod Results**

The Final IS/MND includes the following contents:

- Public Review Draft IS/MND (provided under separate cover)
- Public Review Draft IS/MND Appendices (provided under separate cover)
- Responses to Written Comments and Revisions to Public Review Draft IS/MND (Sections 2 and 3 of this document and Attachment 1)
- 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 Public Review Draft IS/MND for the Raley Boulevard and Diesel Drive Warehouses 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 three comment letters on the Public Review Draft IS/MND during the 30-day comment period from June 21 to July 20, 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 three comment letters are as follows:

Commenter	Commenter Code
California Department of Transportation – District 3, dated July 15, 2022.....	Caltrans
Central Valley Regional Water Quality Control Board, dated July 20, 2022.....	CVRWQCB
Sacramento Metropolitan Air Quality Management District, dated July 20, 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 governmental agency. The comments are acknowledged by the City and have been considered as part of the project planning and its implementation.

2.3.1 Letter 1: California Department of Transportation, July 15, 2022

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 741-4233 | FAX (530) 741-4245 TTY 711
www.dot.ca.gov



July 15, 2022

GTS# 03-SAC-2022-01120

Mr. Ron Bess
Associate Planner
Community Development Department
300 Richards Boulevard
Sacramento, CA 95811

Raley & Diesel Warehouse Project (DR21-268)

Dear Mr. Bess:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which include addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan 2050, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The Project site consists of three vacant parcels totaling 4.95-acres located at 4450 Raley Boulevard (Assessor's Parcel Numbers [APNs] 238-0220-041, -042, and -043 in the City of Sacramento, Sacramento County, California. The project location is within one mile of the Interstate 80 (I-80)/Raley Boulevard interchange, and consists of a request to construct two tilt-up warehouse buildings with site improvements in the Light Industrial (M-1(S)-R) zone and Citywide Design Review Area. Building A is 41,466 SF and Building B is 25,280 SF. A Lot Line Adjustment will be performed to have each building on its own parcel. Based on the Initial Study/Mitigated Negative Declaration (IS/MND), Caltrans provides the following comments:

Freeway Operations

- In the IS/MND, reference is made to a VMT analysis prepared by DKS Associates in Appendix F (on page 69 of document). However, the appendix was not provided in this submittal. Caltrans requests submittal of the appendix to review the VMT analysis.
- The addition of truck traffic trips generated by the project may exacerbate queuing conditions at the I-80/Raley Boulevard interchange. According to the

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Mr. Ron Bess, Associate Planner
July 15, 2022
Page 2

Trip Generation Manual, 9th Edition from ITE, the project is projected to generate 53 weekdays AM peak hour trip ends and 36 weekday PM peak hour trip ends.

Please prepare the following:

- Using a calibrated simulation model, built with software such as SimTraffic 11, please prepare models to represent Existing Plus Project and Cumulative Plus Project conditions for the AM and PM peak hours to evaluate whether the addition of project trips causes the off-ramp queues at the SR I-80/Raley Boulevard off-ramps spill back to the SR I-80 mainlines (for both EB and WB). Caltrans requests the use of the maximum queue length over the 95th percentile queue length.
- Using the methodology described in Section 1.4 of the Ramp Metering Design Manual, please analyze on-ramp queues from the ramp meters at the SR I-80/Raley Boulevard interchange under Existing Plus Project and Cumulative Plus Project conditions for the AM and PM peak hours. Please coordinate with Caltrans Freeway Operations for ramp metering rates and future ramp metering assumptions.
- Peak hour freeway mainline level of service analysis is not needed for this project.
- For these calculations, please use project-specific or local land-use specific trip data if available. If this is not available, please use updated methodologies and trip rates from the ITE Trip Generation Manual, 11th Edition and Trip Generation Handbook, 3rd Edition.

↑
1-3

Traffic Safety

Caltrans request what impacts are expected on I-80 during construction and provide a Traffic Control Plan as appropriate.

1-4

Encroachment Permit

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

1-5
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Hikmat Bsaiibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,



GARY ARNOLD, Branch Chief
Local Development Review, Equity and System Planning
Division of Planning, Local Assistance and Sustainability
Caltrans District 3

↑
1-5
1-6

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

Response to Caltrans Comment 1-1

The commenter provides an introductory statement for the California Department of Transportation (Caltrans) as the reviewing agency and a summary of the proposed project. The commenter does not address the adequacy of the Public Review Draft IS/MND, and no further response is required.

Response to Caltrans Comment 1-2

The commenter requested that Caltrans receive a copy of the vehicle miles traveled (VMT) analysis prepared by DKS Associates and referenced as Appendix F (on page 69 of the Public Review Draft IS/MND). A copy of Appendix F was available on the City's website during the public review period <https://www.cityofsacramento.org/CommunityDevelopment/Planning/Environmental/Impact-Reports>. The City provided the VMT Analysis to the Local Development Review Coordinator for Caltrans on July 29, 2022. Caltrans provided no additional comments following the submittal.¹ No further response is required.

Response to Caltrans Comment 1-3

The commenter stated that 53 weekday AM peak hour trips and 36 weekday PM peak hour trips would be generated by the project and that the addition of project-generated truck traffic trips may exacerbate queuing conditions at the Interstate 80 (I-80)/Raley Boulevard interchange. The commenter requested that project-specific transportation modeling and analysis be conducted for ramp queuing operations for existing plus project and cumulative conditions using recommended software and methodologies.

Representatives from the City of Sacramento Public Works Department, Transportation Division, provided an email response to the Caltrans comment letter on August 24, 2022.² The Public Works Department noted the project would generate a minimal number of peak hour trips and would be below the 100 peak hour trip threshold where the City would generally require a Local Transportation Analysis. The AM peak hour shows 24 entering and 8 exiting trips, and the PM peak hour shows 9 entering and 25 exiting trips (ITE 11th Ed., 150 -Warehousing, Weekday, Peak Hour of Adjacent Street Traffic, One Hour between 4 p.m. and 6 p.m.). In addition, given the project is consistent with the land use designation, permissible densities, and intensities of use for the project site as set forth in the 2035 General Plan, the CEQA analysis assumed the project would not produce any new and more severe impacts than those disclosed in the 2035 General Plan EIR. Therefore, due to the minimal number of trips and conformance with the 2035 General Plan, a transportation and queuing analysis is not required for this project. Additional communication between the City and Caltrans staff subsequent to August 24, 2022, indicated Caltrans' acceptance of the City's reasoning for no additional traffic modeling to analyze queuing conditions at the I-80/Raley Boulevard interchange, and no further response is required.³

Response to Caltrans Comment 1-4

The commenter asks what impacts are expected on I-80 during construction and to provide a Traffic Control Plan, as appropriate. Construction activities on the project site are not anticipated to affect or close any of the surrounding streets, including I-80. Construction activities would not result in any street closures, detours, or significant delays and access for emergency vehicles would be maintained. Construction vehicle traffic would be less than that expected under future operations and would be temporary, occurring over a period of 5 months. Due to the minimal number of vehicle trips, conformance with the 2035 General Plan, and limited length of construction, a Traffic Control Plan would not be required for this project. No further response is required.

¹ Email from Satwinder Dhatt (Caltrans) to Pelle Clark (Senior Engineer, City of Sacramento Transportation Division) re: Caltrans Letter - DR21-268 Raley & Diesel Warehouse, August 25, 2022.

² Email from Pelle Clark (Senior Engineer, City of Sacramento Transportation Division) to Satwinder Dhatt (Caltrans) re: Caltrans Letter - DR21-268 Raley & Diesel Warehouse, August 24, 2022.

³ Email from Satwinder Dhatt (Caltrans) to Pelle Clark (Senior Engineer, City of Sacramento Transportation Division) re: Caltrans Letter - DR21-268 Raley & Diesel Warehouse, August 25, 2022.

Response to Caltrans Comment 1-5

The commenter notes that Caltrans requires an Encroachment Permit for any project along or within Caltrans' right-of-way and outlines the required documentation. The comment does not address the adequacy of the Public Review Draft IS/MND, and no further response is required.

Response to Caltrans Comment 1-6

The commenter requests notification and information on any future actions regarding the project and the opportunity to review and comment on any project changes. Contact information for Caltrans staff is provided. No further response is required.

2.3.2 Letter 2: Sacramento Metropolitan Air Quality Management District, July 20, 2022



July 20, 2022

Ron Bess, Associate Planner
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor, Sacramento, CA 95811

Subject: Raley & Diesel Warehouse Project (DR21-268) (State Clearinghouse #2022060426)

Dear Ron Bess:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the [Mitigated Negative Declaration \(MND\) for the Raley Diesel Warehouse Project](#) under the California Environmental Quality Act (CEQA). This project is a request to construct two tilt-up warehouse buildings, one of 41,466 and one of 25,280 square feet, with site improvements on three vacant parcels in the Light Industrial Zone.

2-1

Sac Metro Air District offers the following recommendations on air quality and climate considerations for project implementation and CEQA review, consistent with methods recommended in our [Guide to Air Quality Assessment in Sacramento County](#) (CEQA Guide), available on our website:

- The MND contends that the project greenhouse gas emissions are less than significant because the project incorporates best management practices (BMPs) from [Sac Metro Air District's greenhouse gas thresholds](#). Because these BMPs are not clearly part of the project description, they should be explicitly included as mitigation measures. Sac Metro Air District recommends that the MND explicitly include as mitigation measures BMPs from our greenhouse gas thresholds, including (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.
- 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 mitigation.
- Correct typos Table 9 "Maximum Unmitigated Project Construction GHG Emissions," specifically label the pollutant as "GHG" for "greenhouse gases," rather than "HG," and clarify that project emissions are measured for metric tons per year rather than pounds per day.

2-2

2-3

2-4

Toxic Air Contaminants

The MND finds the impacts of “Result in exposure of sensitive receptors to substantial pollutant concentrations” and “Result in TAC [[Toxic Air Contaminant](#)] exposures creating a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources” – identified as Question F and Question G, respectively – to be less than significant because “The federal ambient air quality standards (i.e., NAAQS) were established to protect public health, particularly sensitive populations (i.e., asthmatics, children, and the elderly). The health risks associated with exposure to criteria pollutants are evaluated on a regional level, based on the region’s attainment of the NAAQS. As such, the [Sac Metro Air District’s] regional thresholds were set at emission levels tied to the region’s attainment status. Therefore, since the project would not exceed [Sac Metro Air District] regional thresholds for construction or operational air emissions, it can be reasonably inferred that the project would not result in air quality health impacts.” Please note that TACs are not classified as NAAQS and no ambient air quality standards have been established for them. We were unable to find an answer to Question G, on risk thresholds from stationary sources.

2-5

- The Sac Metro Air District CEQA Guide describes expectations for CEQA analysis of TAC emissions, including a discussion of whether the project would locate any permitted or nonpermitted TAC sources near existing or future planned sensitive receptors. Should this be the case, please determine an appropriate level of analysis to disclose impacts, make a significance determination about exposure to TACs from project operations without mitigation, feasible mitigation necessary to reduce TAC exposure resulting from project operations, and whether the reduction would be sufficient to reduce the impact to a less than significant level.

2-6

Construction & Permitting

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](#). Please visit our [permitting webpage](#), email permitting@airquality.org, or call 279-207-1122 for information on permitting requirements for generators or other equipment or processes associated with project uses that may release air pollutants.

2-7

Conclusion

Thank you for your attention to our comments. If you have questions about them, please contact me at mwright@airquality.org or 279-207-1157.

Sincerely,



Molly Wright, AICP
Air Quality Planner / Analyst

c: Paul Philley, AICP, Program Supervisor, Sac Metro Air District

Response to SMAQMD Comment 2-1

The commenter introduces the Sacramento Metropolitan Air Quality Management District (SMAQMD) as the reviewing agency, provides a short summary of the proposed project, and introduces a list of recommendations on air quality and climate considerations for project implementation and CEQA review, consistent with methods recommended in the SMAQMD's *Guide to Air Quality Assessment in Sacramento County* (CEQA Guide). The commenter does not address the adequacy of the Public Review Draft IS/MND, and no further response is required.

Response to SMAQMD Comment 2-2

The commenter recommends that Best Management Practices (BMPs) from the SMAQMD's greenhouse gas (GHG) thresholds be included as a mitigation measure because they were not identified as part of the project in the Public Review Draft IS/MND.⁴

As discussed on page 50 of the Public Review Draft IS/MND (Greenhouse Gas Emissions, Question A):

“Operational greenhouse gases must demonstrate consistency with the Climate Change Scoping Plan by implementing applicable BMPs, or equivalent on-site or off-site mitigation.

All projects must implement tier 1 BMPs (BMP 1 and 2):

- 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.

The project would be below the GHG thresholds of significance during construction and operations and would implement the tier 1 BMPs shown above. Consequently, the proposed project would result in **no additional significant environmental effects** beyond those analyzed in the Master EIR and would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.”

The project as proposed is designed without natural gas infrastructure (see Figure 5: Proposed Utility Plan on page 11 of the Public Review Draft IS/MND and in Appendix A). As shown on Figure 3 of the Public Review Draft IS/MND on page 8 and discussed on page 9, four clean air vehicle parking spaces and three electric vehicle (EV) Ready parking spaces would be provided as part of the project.

However, as described in Sections 3.2 and 3.3, below, the Public Review Draft IS/MND has been revised and/or clarified to explicitly include the SMAQMD's Tier 1 BMPs in the project description and as a standard condition of approval of the project.

Response to SMAQMD Comment 2-3

The commenter recommends that SMAQMD's Basic Construction Emission Control Practices (BCECP) be included in the Public Review Draft IS/MND as a mitigation measure to reduce particulate matter emissions.

As stated on pages 23 through 24 of the Public Review Draft IS/MND (Air Quality, Question A):

“It should be noted that all projects under the jurisdiction of SMAQMD are required to comply with all applicable SMAQMD rules and regulations (a complete list of current rules is available at www.airquality.org/businesses/rulesregulations). Rules and regulations related to construction

⁴ Ramboll US Corporation. 2020. *Greenhouse Gas Thresholds for Sacramento County*. Prepared for Sacramento Metropolitan Air Quality Management District. Available at: <https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>. Accessed September 2022.

include, but are not limited to, Rule 201 (General Permit Requirements), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), Rule 404 (Particulate Matter), Rule 414 (Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 British Thermal Units per Hour), Rule 417 (Wood Burning Appliances), Rule 442 (Architectural Coatings), Rule 453 (Cutback and Emulsified Asphalt Paving Materials), Rule 460 (Adhesives and Sealants), Rule 902 (Asbestos) and California Code of Regulations (CCR) requirements related to the registration of portable equipment and anti-idling. Furthermore, all projects are required to implement SMAQMD's Basic Construction Emission Control Practices (BCECP)."

As stated on page 25 of the Public Review Draft IS/MND (Air Quality, Question D):

"To comply with the construction thresholds presented in Table 6, projects must implement all feasible SMAQMD Best Management Practices (BMPs) and Best Available Control Technologies (BACTs) related to dust control. The control of fugitive dust during construction is required by SMAQMD Rule 403 and enforced by SMAQMD staff. The BMPs for dust control include the following:

- 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 2 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.
- 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 either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (CCR, Title 13, sections 2449(d)(3) and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, sections 2449 and 2449.1). For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or https://www.arb.ca.gov/msprog/offroad/cert/cert.php?eng_id=OFCL. Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated."

Thus, the air quality analysis in the Public Review Draft IS/MND correctly followed SMAQMD methodologies and cited applicable SMAQMD rules and regulations that would be a standard condition of approval or construction document language for all development projects, including the proposed project.

However, as described in Section 3.2, below, the Public Review Draft IS/MND has been revised and/or clarified to explicitly include the SMAQMD's BCECP in the project description and as a standard condition of approval of the project.

Response to SMAQMD Comment 2-4

The commenter notes typographical corrections to be made to Table 9: Maximum Unmitigated Project Construction GHG Emissions (see page 50 of the Public Review Draft IS/MND). These corrections are shown in Section 3.6, below. No further response is required.

Response to SMAQMD Comment 2-5

The commenter requests clarifications related to the discussion addressing Question F and Question G in Section 2, Air Quality, of the Public Review Draft IS/MND (see pages 19 and 27). As noted in the comment, it is affirmed that toxic air contaminant (TAC) emissions are not criteria air pollutants and do not have established ambient air quality standards (see pages 21 - 22 of the Public Review Draft IS/MND for a discussion of TAC emissions, associated health risks, and applicable significant thresholds). The analysis related to project-related TAC emissions is included on page 27 of the Public Review Draft IS/MND.

As discussed under Response to SMAQMD Comment 2-6 and shown in Section 3.3, below, the response under Question F was intended to address both Questions F and G; the title has been revised to also identify Question G. No further response is required.

Response to SMAQMD Comment 2-6

The commenter describes the analysis required by the SMAQMD related to TAC emissions and exposure of sensitive receptors to increased health risk due to TAC emissions and other substantial air pollutant concentrations.

As noted on page 21 of the Public Review Draft IS/MND under “Environmental Setting”:

“The closest sensitive receptors to the project site include the single-family residences approximately 150 feet and 360 feet north of the project site (Diesel Drive) and the single-family residences approximately 430 feet southwest of the project site (Raley Boulevard and Bell Avenue). In addition, the Bell Avenue Elementary School is located approximately 1,750 feet east of the project site.”

The analysis on page 27 of the Public Review Draft IS/MND reaffirms the presence of sensitive receptors and that operational emissions would include mobile TAC emissions associated with heavy-duty truck traffic. As noted, “Implementation of the proposed project would result in the use of diesel-powered construction equipment as well as heavy-duty diesel vehicles during project operations.” As discussed, the project would be subject to the regulations and laws at the federal, state, and regional level that would minimize TAC emissions and protect sensitive receptors from exposure to substantial concentrations of TAC emissions, i.e., limiting idling of heavy-duty trucks to 5 minutes or less. The proposed project would not result in the emission of substantial concentrations of localized carbon monoxide (CO) or TAC. Unmitigated project construction would be below SMAQMD’s thresholds of significance for nitrogen oxides (NO_x) and particulate matter (PM). In addition, emissions during project operations have been shown to be below SMAQMD’s thresholds.

However, as described in Section 3.2, Section 3.3, and Section 3.6, below, and shown in Attachment 1, the Public Review Draft IS/MND and Appendix B (CalEEMod) have been updated to account for the project applicant’s inclusion of a new on-site stationary source (299-horsepower diesel-powered fire pump) that would be permitted through the SMAQMD. Table 4, Table 5, Table 7, and Table 9 (pages 23, 24, 26 and 50, respectively, of the Public Review Draft IS/MND) have been revised to be consistent with the updated CalEEMod output (Attachment 1) and to correct minor errors. No further response is required.

Response to SMAQMD Comment 2-7

The commenter notes that all projects are subject to SMAQMD rules and regulations in effect at the time of construction. The commenter does not address the adequacy of the Public Review Draft IS/MND, and no further response is required.

2.3.3 Letter 3: Central Valley Regional Water Quality Control Board, July 20, 2022



Central Valley Regional Water Quality Control Board

20 July 2022

Ron Bess
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
Rbess@cityofsacramento.org

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, RALEY AND DIESEL WAREHOUSE (DR21-268) PROJECT, SCH#2022060426, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 21 June 2021 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 Raley and Diesel Warehouse (DR21-268) 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

3-1

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

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Raley and Diesel Warehouse
(DR21-268) Project
Sacramento County

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20 July 2022

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:

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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

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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.

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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/

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



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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/wqo/wqo2003-0003.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

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Response to CVRWQB Comment 3-1

The commenter provides a summary of the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) standard requirements related to water quality regulations and permitting and does not specifically address the adequacy of the Public Review Draft IS/MND. No further response is required.

SECTION 3. REVISIONS TO INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

3.1 OVERVIEW

This document presents, in ~~striketrough~~ and double-underline format, the revisions to the Public Review Draft IS/MND for the Raley Boulevard and Diesel Drive Warehouses Project. The revisions to the Public Review Draft IS/MND do not affect the adequacy of the environmental analysis or conclusions in the Public Review Draft 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 Public Review Draft IS/MND, recirculation is not required (State CEQA Guidelines Section 15073.5).

Based on the comments received on the Public Review Draft IS/MND prepared for the proposed project (released for public review on June 21, 2022), as well as staff-initiated changes and errata, the following revisions have been made to the Public Review Draft IS/MND.

3.2 SECTION II, PROJECT DESCRIPTION

In response to Letter 2, SMAQMD Comment 2-2, the following text would be added to the second paragraph under the “Site Access, Parking, and Vehicle Circulation” heading on page 9 of the Public Review Draft IS/MND:

“The project would include a total of 57 surface parking spaces, consisting of 49 standard spaces, 2 Americans with Disabilities Act (ADA) van accessible spaces, 2 ADA standard accessible spaces, ~~and 4 clean air vehicle spaces, and 3 electric vehicle (EV) Ready spaces. Inclusion of EV Ready spaces would meet Tier 1 Best Management Practices (BMPs) recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD).^{5A} – BMP 2 (EV Ready): Projects shall meet the current CalGreen Tier 2 standards, except all EV Capable spaces shall instead be EV Ready.~~ Parking for Building A would consist of 35 surface spaces situated along the eastern and western portions of the building. There would be bicycle lockers for four bicycles and one rack for two bicycles. Parking for Building B would consist of 22 surface spaces situated along the western portion of the building. There would be bicycle lockers for two bicycles and one rack for two bicycles.”

New Public Review Draft IS/MND footnote:

^{5A} Ramboll US Corporation. 2020. *Greenhouse Gas Thresholds for Sacramento County*. Prepared for Sacramento Metropolitan Air Quality Management District. Available at: <https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>. Accessed September 2022.”

In response to Letter 2, SMAQMD Comment 2-2, the following text would be added to the end of the first and second paragraphs under the “Utilities” heading on page 9 of the Public Review Draft IS/MND:

“There is an existing 10-inch-diameter water line within the Diesel Drive right-of-way (ROW), an existing 8-inch-diameter water line within the Raley Boulevard ROW and two existing water lines ranging in diameter from 12 to 18 inches within the Bell Avenue ROW. In addition, there are multiple storm drain pipes throughout the site ranging in diameter from 8 to 12 inches. There is no existing on-site natural gas infrastructure.”

The project will construct 6- and 8-inch-diameter fire service water lines that would be routed within the proposed drive aisles and connect to four proposed hydrants throughout the project site. Implementation of the proposed project would also include new 2-inch-diameter domestic water pipes and 6-inch-diameter wastewater pipes to connect the proposed buildings to the

existing water and wastewater infrastructure within the Diesel Drive, Raley Boulevard, and Bell Avenue ROWs (see **Figure 5: Proposed Utility Plan**). The project applicant would prepare a project-specific water supply study to show that that existing flows in the area can supply the project's domestic and fire flow demands, for review and approval by the Department of Utilities. Additionally, the project would not construct new on-site natural gas infrastructure in compliance with the SMAQMD's Tier 1 BMPs – BMP 1 (No natural gas): Projects shall be designed and constructed without natural gas infrastructure.

After publication of the Public Review Draft IS/MND the project applicant introduced a fire pump as part of an on-site Early Suppression Fast Response system. The California Emissions Estimator Model (CalEEMod) results were updated to include a 299-horsepower diesel-powered fire pump engine that would run 2 hours per day during operations and a total of 500 hours per year (accounting for testing and maintenance). The updated CalEEMod results are included as Attachment 1 which replaces Appendix B to the Public Review Draft IS/MND. The following text would be added under the "Project Operations" heading on page 12 of the Public Review Draft IS/MND:

"As part of the project site's Early Suppression Fast Response system, a 299-horsepower diesel-fuel powered fire pump engine would be located in a Fire Pump Room in Building A or Building B. Routine testing and maintenance is not anticipated to exceed 500 hours per year."

In response to Letter 2, SMAQMD Comment 2-3, the following text would be added to the end of the second paragraph under the "Construction" heading on page 12 of the Public Review Draft IS/MND:

"Construction activities for the proposed project would include grading and excavation of the 4.95-acre project site, followed by utility trenching and site preparation, building construction, paving, architectural coating, and landscaping. Grading and excavation would range from 2 to 5 feet in portions of the project site. Construction is anticipated to require approximately 14,177 cubic yards of cut and approximately 856 cubic yards of fill, resulting in 13,321 cubic yards of export. The areas of fill would be concentrated along the northern project boundary and the southeastern portion of the project site underlying Building B. Project construction would include use of standard construction equipment, including excavators, graders, tractors, loaders, and pavers. During construction activities, the entire perimeter of the project site would be enclosed with a chain link fence. The project would incorporate the SMAQMD's Basic Construction Emission Control Practices (BCECP)^{6A} to control fugitive dust from project construction activities. These practices would be a standard condition of approval and would include, but not be limited to:

1. Control of fugitive dust is required by District Rule 403 and enforced by District staff.
2. 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.
3. 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.
4. Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once per day. Use of dry power sweeping is prohibited.
5. Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
6. 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."

New Public Review Draft IS/MND footnote:

^{6A} Sacramento Metropolitan Air Quality Management District (SMAQMD). 2019. *Basic Construction Emission Control Practices (Best Management Practices)*. Available at: https://www.airquality.org/LandUseTransportation/Documents/Ch3BasicEmissionControlPracticesBMP_SFinal7-2019.pdf. Accessed September 2022.

In response to the addition of a diesel-powered fire pump engine, the following text would be added to the paragraph under the “Required Discretionary Approvals” heading on page 12 of the Public Review Draft IS/MND:

“The City of Sacramento is the Lead Agency with responsibility for approving the project, including approval of the Initial Study/Mitigated Negative Declaration and mitigation monitoring plan, issuance of a Lot Line Adjustment, and conducting Site Plan and Design Review. The project would also require permits for demolition, grading, building, and occupancy. The project would also require a Stationary Source Permit from the SMAQMD for the diesel-powered fire pump engine. The project would require a Clean Water Act Section 404 Permit and Section 401 Certification from the U.S. Army Corps of Engineers and the Central Valley Regional Water Quality Control Board, respectively. Approval from other public agencies is not required.”

3.3 SECTION III.2, AIR QUALITY

The paragraph under “Toxic Air Contaminants” on page 21 of the Public Review Draft IS/MND is revised as follows:

“According to the California Almanac of Emissions and Air Quality, most of the estimated health risks from toxic air contaminants (TACs) can be attributed to relatively few compounds, the most important being diesel particulate matter (diesel PM).”

In order to correct a minor error in Table 4 on page 23 of the Public Review Draft IS/MND and be consistent with updated CalEEMod results in Attachment 1 to this document Table 4 is hereby revised as follows:

Table 4: Maximum Unmitigated Project Construction NO_x Emissions

Pollutant	Project Emissions (lbs/day)	SMAQMD Threshold of Significance (lbs/day)
NO _x	63.5007	85

Source: CalEEMod, September May-2022 (see **Appendix B**).

In response to the addition of a diesel-powered fire pump engine and updated CalEEMod results in Attachment 1 to this document, Table 5 on page 24 of the Public Review Draft IS/MND is hereby revised as follows:

Table 5: Maximum Project Operational NO_x and ROG Emissions

Pollutant	Project Emissions (lbs/day)	SMAQMD Thresholds of Significance (lbs/day)
NO _x	<u>2.74</u> 0.0004	65
ROG	<u>2.52</u> 4.54	65

Source: CalEEMod, September May-2022 (see **Appendix B**).

In response to the addition of a diesel-powered fire pump engine and updated CalEEMod results in Attachment 1 to this document, Table 7 on page 26 of the Public Review Draft IS/MND is hereby revised as follows:

Table 7: Maximum Unmitigated Project Emissions of PM₁₀ and PM_{2.5}

Pollutant	Project Construction Emissions (lbs/day)	Construction Thresholds (lbs/day)	Project Operational Emissions (lbs/day)	Operational Thresholds (lbs/day)	Project Operational Emissions (tons/yr)	Operational Thresholds (tons/yr)
PM ₁₀	3.62	80	<u>0.76</u> 0.62	80	<u>0.13</u> 0.11	14.6
PM _{2.5}	2.47	82	<u>0.30</u> 0.15	82	<u>0.04</u> 0.03	15

Source: CalEEMod, ~~September~~ May 2022 (see **Appendix B**).

In response to Letter 2, SMAQMD Comment 2-5, the heading at the top of page 27 of the Public Review Draft IS/MND is hereby revised as follows:

“Question F and Question G”

In response to the addition of a diesel-powered fire pump engine and Letter 2, SMAQMD Comment 2-6, regarding TAC emissions and stationary sources, text in the first and second paragraphs on page 27 of the Public Review Draft IS/MND under “TAC Emissions” is hereby revised as follows:

“...Implementation of the proposed project would result in the temporary use of diesel-powered construction equipment (approximately 5 months) as well as heavy-duty diesel vehicles and one diesel-powered fire pump engine during project operations.

Scattered rural single-family residences are located near the project site, with the nearest located 150 feet from the project site north of Diesel Drive. Construction equipment, vehicle, and material movement activities would occur throughout the project site. In addition, the project would be subject to the regulations and laws relating to TACs at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations. For example, the proposed on-site diesel-powered fire pump engine would be permitted by the SMAQMD requiring monitoring and reports on a regular schedule (e.g., quarterly, annually) and Sections 2449 and 2485 of Title 13 of the CCR limits idling of heavy-duty trucks to 5 minutes. Unless specifically exempted in Sections 2449 and 2485, all diesel-powered equipment and heavy-duty trucks would be subject to the idling limitations, which would reduce the emission of DPM during both project construction and operations. Therefore, this impact would be **less than significant**, and no mitigation would be required.”

In response to the addition of a diesel-powered fire pump engine and Letter 2, SMAQMD Comment 2-6, regarding TAC emissions and stationary sources, text in the second paragraph on page 27 of the Public Review Draft IS/MND under “Conclusions” is hereby revised as follows:

“As discussed above, the proposed project would not result in the emission of substantial concentrations of localized CO or TAC. Unmitigated project construction would be below SMAQMD’s thresholds of significance for NOX and PM. In addition, unmitigated PM emissions during project operations associated with the mobile (117 total daily vehicle trips) and stationary sources (diesel-powered fire pump engine) have been shown to be below SMAQMD’s thresholds (see Table 7). Therefore, the proposed project would have **no additional significant environmental effects** beyond what was previously evaluated in the Master EIR.

3.4 SECTION III.4, ENERGY

The last paragraph on page 44 of the Public Review Draft IS/MND under “Findings” is revised as follows:

“The proposed project would have no additional project-specific environmental effects relating to ~~Hydrology and Water Quality~~Energy. Therefore, implementation of the proposed project would have **no additional significant environmental effects** beyond what was previously analyzed in the Master EIR.

3.5 SECTION III.5, GEOLOGY AND SOILS

The last paragraph on page 47 of the Public Review Draft IS/MND under “Findings” is revised as follows:

“The proposed project would be consistent with the type and intensity of uses anticipated for the site in the 2035 General Plan Master EIR. Implementation of the proposed project would result in **no additional significant environmental effects** related to Geology and Soils beyond what has been previously analyzed in the Master EIR.

3.6 SECTION III.6, GREENHOUSE GAS EMISSIONS

In order to correct a minor error in Table 9 on page 50 of the Public Review Draft IS/MND and be consistent with updated CalEEMod results in Attachment 1 to this document Table 9 is hereby revised as follows:

Table 9: Maximum Unmitigated Project Construction GHG Emissions

Pollutant	Project Emissions (<u>Mt/year</u>) (<u>lbs/day</u>)	SMAQMD Threshold of Significance (Mt/year)
<u>GHG</u>	<u>636.29</u> 635.97	1,100

Source: CalEEMod, ~~September~~ May-2022 (see **Appendix B**).

In response to the addition of a diesel-powered fire pump engine; Letter 2, SMAQMD Comment 2-4; and Letter 2, SMAQMD Comment 2-6, regarding TAC emissions and stationary sources, text in the three paragraphs on page 50 of the Public Review Draft IS/MND under Table 9 is hereby revised as follows:

“As shown in the table, the proposed project’s maximum unmitigated construction-related GHG emissions would not exceed the applicable threshold of significance of 1,100 metric tons per year. Emissions from proposed project operations were quantified using CalEEMod as described in the Air Quality section. Based on the modeling, the proposed project would result in approximately ~~92.43~~147.78 metric tons of CO₂ equivalent per year. The operational GHG emissions estimate includes the on-site fire pump and would not exceed the SMAQMD’s 10,000 metric tons of CO₂ equivalent per year threshold of significance for stationary sources. Operational ~~greenhouse gases~~ GHG emissions analyses must also demonstrate consistency with the Climate Change Scoping Plan by implementing applicable BMPs identified by the SMAQMD, or equivalent on-site or off-site mitigation.

All projects must implement the SMAQMD’s Tier 1 BMPs (BMP 1 and 2):

- 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.

The project would be below the GHG thresholds of significance during construction and operations and would implement the SMAQMD’s Tier 1 BMPs, shown above, as a standard condition of approval of the project. Consequently, the proposed project would

result in ***no additional significant environmental effects*** beyond those analyzed in the Master EIR and would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.”

3.7 SECTION III.7, HAZARDS

The last paragraph on page 54 of the Public Review Draft IS/MND under “Findings” is revised as follows:

“The project site is not subject to any RECs and the proposed project would not have the potential to result in impacts related to Hazards. The proposed project would be consistent with the type and intensity of uses anticipated for the site under the City’s 2035 General Plan. Thus, implementation of the proposed project would result in ***no additional significant environmental effects*** beyond what has been previously analyzed in the Master EIR.”

3.8 SECTION III.13, TRIBAL CULTURAL RESOURCES

The last paragraph on page 77 of the Public Review Draft IS/MND under “Findings” is revised as follows:

“All ~~additional~~ potentially significant environmental effects of the proposed project relating to Tribal Cultural Resources can be mitigated to a less-than-significant level. Therefore, implementation of the proposed project would result in ***no additional significant environmental effects*** beyond what has been previously analyzed in the Master EIR.”