

City of Sacramento Combined Sewer System Rehabilitation And Improvement Plan

Final Environmental Impact Report Responses To Comments

SCH No. 96082013

PREPARED BY

City of Sacramento



IN CONJUNCTION WITH

**EIP Associates
Peak Associates**



February 1997

**City of Sacramento
Combined Sewer System Rehabilitation and Improvement Plan**

Final Environmental Impact Report

Responses To Comments

State Clearinghouse No. 96082013

City of Sacramento Project No. XD41

Prepared by:

City of Sacramento

In Association With:

EIP Associates
Peak & Associates

February 10, 1997

TABLE OF CONTENTS

TABLE OF CONTENTS

<u>Chapter</u>	<u>Page</u>
1. INTRODUCTION	1-1
A. California Environmental Quality Act Process	
B. Organization of this Document	
C. Public Participation and Review	
2. PERSONS, ORGANIZATIONS AND AGENCIES COMMENTING ON THE DRAFT EIR	2-1
3. COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR	3-1

CHAPTER 1

INTRODUCTION

1. INTRODUCTION

A. CALIFORNIA ENVIRONMENTAL QUALITY ACT PROCESS

On November 8, 1996, the City of Sacramento released the Draft Environmental Impact Report (Draft EIR) for the Combined Sewer System Rehabilitation and Improvement Plan (SCH No. 96082013). The 45-day public review and comment period for the Draft EIR ended on December 23, 1996.

The Draft EIR and this Responses to Comments document constitute the Final EIR for the proposed project.

The Final EIR is an informational document prepared by the City of Sacramento, the Lead Agency. The Final EIR provides written responses to comments on the Draft EIR received during the public review period. The Final EIR must be considered by the decision-making bodies of the Lead Agency before approving or denying the proposed project. The Lead Agency may provide an opportunity for review of the Final EIR by the public or by commenting agencies before approving the project. The review of the Final EIR should focus on the responses to comments on the Draft EIR. The Lead Agency must certify that the Final EIR adequately discloses the environmental effects of the proposed project and has been completed in conformance with CEQA, and that the decision-making bodies independently reviewed and considered the information contained in the EIR prior to approving the project. The Final EIR must also be considered by the Responsible Agencies, the public agencies that have discretionary approval authority over the project. A Responsible Agency must consider the environmental effects of the project as shown in the EIR prior to approving any portion of the project over which it has authority.

The California Environmental Quality Act (CEQA) Guidelines Section 15132 specifies the following:

The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) And any other information added by the Lead Agency.

This Response to Comments document contains the list of commentors, comments from public agencies and the general public and appropriate responses by the Lead Agency to significant environmental points raised in those comments.

B. ORGANIZATION OF THIS DOCUMENT

This document is organized as follows:

Chapter 1: Introduction. This chapter introduces the reader to the requirements of a Final EIR and to the organization of this Responses to Comment document. Chapter 1 also contains the summary of the process for accepting public comments and for responding to the comments that were raised during the public review period.

Chapter 2: Persons, Organizations and Agencies Commenting of the Draft EIR. This chapter lists all of the agencies, organizations and individuals that submitted letters in writing during the comment period.

Chapter 3: Comments and Responses to Comments on the Draft EIR. This chapter contains the comment letters received on the Draft EIR, and the corresponding response to each comment.

The comment letters are organized as follows: federal agencies, state agencies, regional agencies, local agencies and finally organizations/individuals. Each comment letter is presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial with the letter number appearing first, followed by the comment number. For example, comments in Letter 1 are numbered 1-1, 1-2, 1-3, and so on. Immediately following the letter are responses, each with binomials that correspond with the bracketed comments.

As indicated above, specific responses were provided for each comment raised in the letters submitted during the public review period. However, in some cases the response merely notes the commentor's remarks as "comment noted." The reasons for this response may include the following:

- the comment raised is related to the merits of the project, rather than an environmental point, so it is not an EIR issue;
- the comment raised expresses the commentor's opposition to or support of the project;
- the comment is a commentary on the benefits/adversities of the project; or
- the comment is not directly relevant to the analysis of scope of issues addressed in the EIR.

C. PUBLIC PARTICIPATION AND REVIEW

The City of Sacramento notified all Responsible, Trustee and Reviewing agencies, interested groups, organizations, and individuals that a Draft EIR had been completed for the proposed project. The City also used other methods to solicit input during the review period of the Draft

EIR. The following list of actions took place during the preparation, distribution, and review of the Draft EIR:

- The Notice of Preparation (NOP) was filed with the State Clearinghouse on August 6, 1996. The NOP was distributed by the City to all Responsible, Trustee and Reviewing agencies, interested groups, organizations, and individuals. Copies of the NOP and comments received were included in the Draft EIR Appendices 15-1 and 15-2, respectively.
- A Notice of Completion (NOC) and copies of the Draft EIR were filed with the State Clearinghouse on November 8, 1996. An official 45-day public review period for the Draft EIR was established by the State Clearinghouse, ending on December 23, 1996.
- A Notice of Availability (NOA) was distributed to all Responsible, Trustee and Reviewing agencies, interested groups, organizations, and individuals on November 8, 1996. The NOA stated that the City had completed the Draft EIR and that copies were available at the Department of Planning and Development, Environmental Services, 1231 I Street, Room 300, Sacramento, CA, 95814.
- A public notice was placed in the Sacramento Bee on November 8, 1996.

CHAPTER 2

***PERSONS, ORGANIZATIONS AND AGENCIES COMMENTING ON
THE DRAFT EIR***

**2. PERSONS, ORGANIZATIONS AND AGENCIES
COMMENTING ON THE DRAFT EIR**

Federal Agencies

1. U.S. Army Corps of Engineers December 5, 1996

State Agencies

2. Office of Planning and Research December 23, 1996
State Clearinghouse
3. Office of Planning and Research December 30, 1996
State Clearinghouse
4. Cal/EPA State Water Resources Control Board December 20, 1996
Division of Clean Water Programs

Regional Agencies

5. Contra Costa Water District December 23, 1996

Local Agencies

6. County of Sacramento December 24, 1996
Water Quality Division

Organizations

7. Land Park Community Association December 14, 1996

CHAPTER 3

***COMMENTS AND RESPONSES TO COMMENTS
ON THE DRAFT EIR***



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922
December 5, 1996

REPLY TO
ATTENTION OF

RECEIVED

DEC 06 1996

PLANNING SERVICES

Planning Division

Mr. Joe Broadhead, EIR Project Manager
City of Sacramento
Planning and Development Department
1231 I Street, Room 301
Sacramento, California 95814-2904

Dear Mr. Broadhead:

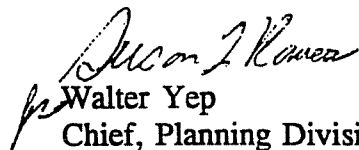
We have reviewed the Combined Sewer System Draft Environmental Impact Report provided with your November 8, 1996, letter.

The proposed project will not conflict with any project or other programs within our jurisdiction. If we can be of further assistance, please call Mr. Allan Oto, Chief of our Sacramento Basin Branch. His telephone number is (916) 557-6770.

1-1

Thank you for coordinating with us.

Sincerely,


Walter Yep
Chief, Planning Division

LETTER 1: Department of the Army, U.S. Army Corps of Engineers

Response to Comment 1-1

The comment notes that the proposed CSS Plan will not conflict with any project or program within the jurisdiction of the U.S. Army Corps of Engineers. The comment is noted and will be forwarded to the City Council for consideration during the decision-making process.



PETE WILSON
GOVERNOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814



LEE GRISSOM
DIRECTOR

December 23, 1996

RECEIVED

DEC 26 1996

PLANNING SERVICES

JOE BROADHEAD
CITY OF SACRAMENTO
1231 I STREET
SACRAEMTNO, CA 95814-2904

Subject: COMBINED SEWER SYSTEM SCH #: 96082013

Dear JOE BROADHEAD:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

2-1

Please call Kristen Derscheid at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Notice of Completion

See NOTE Below

SCH # 96082013

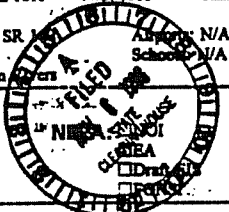
Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: Combined Sewer System Improvement and Rehabilitation Plan

Lead Agency: City of Sacramento, Planning and Development **Contact Person:** Joe Broadhead
Address: 1231 I Street, Room 301 **Phone:** (916) 264-7622
City: Sacramento, CA 95814 **County:** Sacramento

Project Location: See Attached Maps

County: Sacramento **City/Nearest Community:** Downtown, Land Park and East Sacramento
Cross Streets: Various **Total Acres:** 11,300
Assessor's Parcel No: Various **Section:** N/A **Twp:** N/A **Range:** N/A
Base: N/A **Airport:** N/A
Within 2 Miles: State Hwy #: I-5, SR 99, Bus. 80 & SR **Schools:** N/A
Railways: UPRR & SPRR
Waterways: Sacramento and American Rivers



Document Type:

CEQA: NOP/IS Supplement/Subsequent
 Early Cons EIR (Prior SCH No.)
 Neg Dec Other
 Draft EIR

Other: Joint Document
 Final Document
 Other

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Precious Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, Parcel Map, Tract Map, etc.) Other: Flood Protection Improvement

Development Type:

Residential: Units Acres Water Facilities: Type MGD
 Office: Sq.ft. Acres Employees Transportation: Type
 Commercial: Sq.ft. Acres Employees Mining: Mineral
 Industrial: Sq.ft. Acres Employees Power: Type Water
 Educational Waste Treatment: Type Combined Sewer System
 Recreational Hazardous Waste: Type
 Other: Flood Protection Improvement

Project Issues Discussed in Document:

Aesthetic/Visual Flood Plain/Flooding Schools/Universities Water Quality
 Agricultural Land Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Air Quality Geologic/Seismic Sewer Capacity Wetland/Riparian
 Archaeological/Historical Minerals Soil Erosion/Compaction/Grading Wetlands
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Land Use
 Economic/Job Public Services/Facilities Traffic/Circulation Cumulative Effects
 Fiscal Recreation/Parks Vegetation Other

Present Land Use/Zoning/General Plan Use:

City of Sacramento General Plan Use - Transportation/Utilities
 Zoning - M1/M2

State Clearinghouse Contact: Ms. Angel Howell
 (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 11.7.96
 Dept. Review to Agency 12.16
 Agency Rev to SCH 12.20
 SCH COMPLIANCE 12.23

- Resources 96082013
- Boating
- Coastal Comm
- Coastal Conserv
- Colorado Rvr Bd
- Conservation
- Fish & Game # 2
- Delta Protection Commission
- Forestry
- Parks & Rec/OHP
- Reclamation
- BCDC
- DWR
- OES
- Bus Transp Hous
- Aeronautics
- CHP
- Caltrans # 3
- Trans Planning
- Housing & Devel
- Health & Welfare
- Dept. of Health
- Medical Waste
- State/Consumer Svcs
- General Services
- Cal/EPA
- ARB
- CA Waste Mgmt Bd
- SWRCB: Grants
- SWRCB: Delta
- SWRCB: Wtr Quality
- SWRCB: Wtr Rights
- Reg. WQCB # 5
- DTSC/CTC 3cc
- Yth/Adlt Corrections
- Corrections
- Independent Comm
- Energy Comm
- NAHC
- PUC
- Santa Mn Mns
- State Lands Comm
- Tahoe Rgl Plan
- Other:

Please note SCH Number on all Comments
 96082013
 Please forward late comments directly to the Lead Agency
 AQMD/APCD 25 (Resources) 11.9
 96082013

LETTER 2: State of California Governor's Office of Planning and Research

Response to Comment 2-1

The comment notes receipt and distribution of the Draft EIR for the Combined Sewer System Rehabilitation and Improvement Plan. No further response is necessary.



PETE WILSON
GOVERNOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814



LEE GRISSOM
DIRECTOR

December 30, 1996

JOE BROADHEAD
CITY OF SACRAMENTO
1231 I STREET
SACRAEMTNO, CA 95814-2904

Subject: COMBINED SEWER SYSTEM SCH #: 96082013

Dear JOE BROADHEAD:

The enclosed comments on your draft environmental documents were received by the State Clearinghouse after the end of the state review period. We are forwarding these comments to you because they provide information or raise issues which may assist you in project review.

3-1

Lead agencies are not required to respond to late comments. However, you may wish to incorporate these additional comments into the preparation of your final environmental document.

Please contact Kristen Derscheid at (916) 445-0613 if you have any questions concerning the review process. When you contact the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Enclosures

cc: Resources Agency

LETTER 3: State of California Governor's Office of Planning and Research

Response to Comment 3-1

The comment notes that the attached comment letter (from Cal/EPA State Water Resources Control Board) was received after the close of the comment period, but is forwarded because it may provide information relevant to the EIR process. The comment further states that a Lead Agency is not required to respond to late comments.

The comment letter is responded to as provided in Letter 4.



Cal/EPA

**State Water
Resources
Control Board**

**Division of
Clean Water
Programs**

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4480
FAX (916) 227-4595

DEC 20 1996

Mr. Joe Broadhead
City of Sacramento
Department of Planning and Development
Environmental Services Division
1231 I Street, Room 300
Sacramento, CA 95814

RECEIVED

DEC 26 1996

PLANNING SERVICES



Pete W.
Governor

Dear Mr. Broadhead:

**ENVIRONMENTAL IMPACT REPORT (EIR) FOR CITY OF SACRAMENTO
COMBINED WASTEWATER TREATMENT PLAN - STATE REVOLVING FUND
LOAN NO. C-06-4441-110 (SCH# 96082013)**

Thank you for the opportunity to review the above document. We understand that the City of Sacramento (City) will be seeking a State Revolving Fund (SRF) Loan from the State Water Resources Control Board (SWRCB), Division of Clean Water Programs (Division).

4-1

As a funding agency, the SWRCB will be a responsible agency under CEQA, and will consider the EIR when deciding whether to issue the loan. Please provide us with a copy of (1) the certified Final EIR including all comments received during the review period and your responses to those comments, (2) the resolution that certifies the document, adopts the mitigation plan and provides CEQA findings, (3) the adopted mitigation monitoring plan, and (4) the Notice of Determination filed with the Governor's Office of Planning and Research when they become available. In addition, we would appreciate notices of any meetings or hearings scheduled regarding the document and project approval.

4-2

Because an SRF loan is partially funded by the U.S. Environmental Protection Agency, additional "NEPA-like" environmental documentation and review are required. For SRF loans, we are required to consult directly with agencies responsible for implementing federal environmental laws. Accordingly, on December 12, 1996 we distributed the EIR to federally designated agencies. The review period will expire on February 1, 1996. In addition, while CEQA itself does not require formal public hearings at any stage of the environmental review process, at least one hearing is required for an SRF loan project. Notices need to be distributed 30 days in advance with a copy sent to us.

4-3



DEC 20 1996

Mr. Joe Broadhead

2

SRF loan projects also need to be cleared with the State Historic Preservation Officer for compliance with Section 106 of the National Historic Preservation Act. Please send us any reports that were prepared for cultural resources record searches or field investigations performed for the project.

4-4

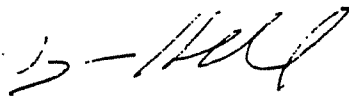
In general, the EIR is adequate for our purposes; however, the Growth-Inducing Impacts Section needs to discuss whether the average dry weather flow treatment capacity of the facilities will be affected under this project. Since the EIR identifies unavoidable significant impacts associated with cultural resources and water quality the City will need to prepare a Statement of Overriding Considerations.

4-5

4-6

Please call me at (916) 227-4480 if you have any questions regarding our environmental review of this project.

Sincerely,



Wayne Hubbard
Environmental Services Unit

cc: State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

LETTER 4: Cal/EPA State Water Resources Control Board, Division of Clean Water Programs

Response to Comment 4-1

The comment correctly notes that the City of Sacramento will be seeking a State Revolving Fund (SRF) loan from the State Water Resources Control Board (SWRCB).

The City has submitted an application (with accompanying environmental documentation) to receive federal funding and is currently waiting for a response from the SWRCB.

Response to Comment 4-2

As a Responsible Agency under CEQA, the commentor requests that the SWRCB receive copies of the Final EIR, the resolution that certifies the EIR, adopts the Mitigation Monitoring Plan (MMP) and provides CEQA findings, the adopted MMP and the Notice of Determination (NOD). The commentor also requests notification of any meetings and hearings.

Although not required for distribution by CEQA, the above listed documents will be forwarded to the SWRCB by the City of Sacramento. It is anticipated that the resolution, the MMP and the NOD will be available by the end of February 1997. Notification of meetings and hearings will be done as appropriate under the CEQA process.

Response to Comment 4-3

The comment states that SRF loans require federal environmental documentation and that the Draft EIR has been forwarded by Cal/EPA to applicable federally designated agencies for review. The comment further states that a public hearing is required for this federal process.

The comment is noted. The City acknowledges that a separate federal review process is required to obtain federal funding.

Response to Comment 4-4

The comment correctly notes that if a SRF loan is required, compliance with Section 106 of the National Historic Preservation Act is required. The commentor requests copies of any cultural resources record searches or field investigations performed for the project.

As stated on page 7.4-14 of the Draft EIR, the CSS Plan would require replacement of brick sewers potentially eligible to meet federal criteria for historic significance. Since the sewer system had not been documented and recorded the impact is considered significant and unavoidable in the Draft EIR. However, as part of the federal funding application, the City has submitted a report to the SWRCB that documents the brick sewer system. The SWRCB will then forward the report to the State Office of Historic Preservation (SHPO) for review for compliance with the National Historic Preservation Act.

It should be noted that the State Historic Preservation Officer has been provided copies of the Initial Study and the Draft EIR. Comments were received on the Initial Study (see Appendix 15-2 of the Draft EIR) and addressed in the Draft EIR in Section 7.4, Cultural Resources. Comments were not received on the Draft EIR.

Response to Comment 4-5

The commentor requests additional discussion of growth-inducing impacts relative to the average dry weather flow treatment capacity.

The CSS Plan would improve the entire CSS, which conveys dry and wet weather flows. Chapter 8 of the Draft EIR addresses the growth-inducing potential of the CSS Plan. As such, this discussion, although focused on wet weather capacity, applies to dry weather capacity since the CSS conveys both. The relationship between dry weather and wet weather flows and capacities is discussed below.

As discussed in Chapter 3 of the Draft EIR, during the summer, dry weather flows are discharged directly from Pump Station 2 (Pump Stations 1/1A are not used during dry weather) to the 72-inch diameter force main leading to the Sacramento Regional Wastewater Treatment Plant (SRWTP). The average dry weather flow to Pump Station 2 from the CSS is approximately 28 MGD. The existing operation agreement between the City and Sacramento Regional County Sanitation District allows for a maximum discharge of 60 MGD to the SRWTP. As such, the current capacity is sufficient to treat all CSS dry weather flows and low-intensity storms. However, when the flow rate exceeds 60 MGD during a moderate or large storm (i.e., approximately 1/2 inch or greater of rainfall), the City activates its Combined Wastewater Treatment Plant (CWTP) and provides advanced primary treatment and disinfection for an additional 130 MGD prior to discharge to the Sacramento River. The CSS Plan addresses the wet weather flow capacity since it is this higher flow that can create flooding, CSOs and outflows. In order to address these issues, components of the CSS must be improved. As stated on pages 4-6 and 8-4 of the Draft EIR, although the capacities at the pump stations will be increased and Pioneer Reservoir converted (facilities that also convey dry weather flows, with the exception of Pumping Stations 1/1A), the CSS Plan would not create additional capacity within the overall system. Rather, the improvements to these facilities would result in a more efficient use of the CSS during periods of high flows. Further, the proposed improvements are necessary in order to serve both the existing development and planned development already planned for and evaluated in previous environmental documents (refer to pages 8-3 and 8-4 of the Draft EIR).

Response to Comment 4-6

The comment correctly notes that a Statement of Overriding Considerations is necessary due to the significant and unavoidable impacts identified in the Draft EIR.



**CONTRA COSTA
WATER DISTRICT**

1331 Concord Avenue
P.O. Box H20
Concord, CA 94524
(510) 688-8000 FAX (510) 688-8122

December 23, 1996

Directors

Joseph L. Campbell
President

James Pretti
Vice President

Elizabeth R. Anello
Bette Boatman
Noble O. Elcenko, D.C.

Walter J. Bishop
General Manager

Joe Broadhead, EIR Project Manager
City of Sacramento
Planning Services Division
1231 I Street, Room 300
Sacramento, California 95814

Subject: Combined Sewer System Draft Environmental Impact Report

Dear Mr. Broadhead:

The Contra Costa Water District ("District") appreciates the opportunity to review the Draft Environmental Impact Report for the Sacramento Combined Sewer System Improvement and Rehabilitation Plan released in November 1996.

The District is a publicly-owned water supply agency serving approximately 400,000 people in central and eastern Contra Costa County and has a vital interest in protecting the quality and reliability of its water supply. Essentially all of CCWD's drinking water supply comes from the Sacramento River and is vulnerable to any degradation in its water quality. Untreated wet weather discharges from the City of Sacramento and elsewhere pose a health risk to the District's customers.

5-1

The District urges the City of Sacramento to proceed with the project as quickly as possible to reduce the wet weather overflow into the Sacramento River to the maximum extent feasible. The District requests that disinfection limits be met to the extent possible with technology that minimizes the formation of disinfection by-products, and maximizes the inactivation of *Giardia* and *Cryptosporidium*.

5-2

The District would like to continue to follow the progress of the project and would appreciate receiving all future mailings including the Final EIR and progress reports on project implementation.

5-3

Sincerely,


Walter J. Bishop

WJB/RAD

COMMENT LETTER 5: Contra Costa Water District

Response to Comment 5-1

The comment states the interest of the Contra Costa Water District (CCWD) relative to untreated wet weather discharges from the City and elsewhere. The comment is noted and will be forwarded to the City Council for consideration during the decision-making process.

Response to Comment 5-2

The comment urges the City to proceed with the CSS Plan and requests that disinfection limits be met to the extent possible.

Although not regulated at this time or a requirement of the City's permit, the City is voluntarily conducting monitoring to determine how effective the current technology is at maximizing the inactivation of *Giardia* and *Cryptosporidium*.¹ The City will continue to review new technologies and methods to determine whether additional controls are needed and the feasibility of implementing new technologies. It should be noted, as stated on page 7.2-25 of the Draft EIR, although there is no CSS-specific data at this time that can confirm levels are minimized, it is expected that implementation of the CSS Plan would have a beneficial effect on pathogen levels. Disinfection prior to discharge from Pioneer Reservoir to the Sacramento River combined with a reduction in the number of CSOs that would be achieved by Phase 1 and Phase 2 improvements is expected to reduce many pathogenic organisms.

In addition, as stated throughout the Impact discussion on pages 7.2-23 through 7.2-36 of the Draft EIR, any new discharges into the system would be subject to applicable water quality protection requirements including compliance with the NPDES Municipal Stormwater permit and associated Water Discharge Requirements (see pages 3-14 through 3-20 and 7.2-10 through 7.2-19 for a discussion of applicable regulations). Implementation of the CSS Plan is intended to not increase pollutant loads and to decrease CSOs to the Sacramento River.

The comment is noted and will be forwarded to the City Council for consideration during the decision-making process.

Response to Comment 5-3

The commentor requests copies of the Final EIR and future progress reports.

Although not required for distribution by CEQA, the Final EIR will be forwarded to the CCWD by the City of Sacramento. At this time, the City of Sacramento Department of Utilities does not intend on preparing progress reports for City purposes.

COUNTY OF SACRAMENTO



WATER QUALITY DIVISION
CHERYL CRESON, Chief

PUBLIC WORKS AGENCY
DOUGLAS M. FRALEIGH, Administrator

COLLECTION SYSTEM, TIM LLOYD
ENGINEERING, MICHAEL A. MAGGI
TREATMENT PLANT, W. H. KIDO

W. H. HARADA, Director
Public Works Administration
R. F. SHANKS, Director
District Engineering
TERRY T. TICE, Director
County Engineering

December 24, 1996
E225.000

John Broadhead, EIR Project Manager
City of Sacramento,
131 I Street, Room 300
Sacramento, CA 95814

Post-it* Fax Note	7671	Date	# of pages
To	Fred Budari	From	Bob Lilly
Co./Dept.		Co.	
Phone #		Phone #	855-8265
Fax #	264-7602	Fax #	

Gentlemen:

**Subject: Draft EIR for the City of Sacramento Combined Sewer System
Rehabilitation and Improvement Plan
(State Clearinghouse Number: 96082013)**

Water Quality Division staff has reviewed the subject document on behalf of Sacramento Regional County Sanitation District (SRCSD) and County Sanitation District No. 1 and has the following comments.

On page 4-8 of the report the capacity of Pump Station 2 is proposed to increase in capacity from 160 to 190 MGD. SRCSD has agreed to pay \$7 million based on a preliminary estimate for a share of the capacity equal to 60 MGD. Increasing the pump capacity will decrease the share of the SRCSD contribution

6-1

If you have any questions regarding this matter, please call me at 855-8253.

Very truly yours,

Bob Lilly

BL:baf

cc: Michael A. Maggi
John C. Boehm
Mary James

lilly/src2.htm/205641

COMMENT LETTER 6: County of Sacramento Water Quality Division

Response to Comment 6-1

The comment notes that a preliminary cost estimate for a share of the proposed Pump Station 2 may decrease. This is not a comment on the EIR and therefore does not require further discussion. However, the comment will be forwarded to the City Council for consideration during the decision-making process.



LAND PARK COMMUNITY ASSOCIATION

December 14, 1996

Mr. Joseph Broadhead, Project Manager
City of Sacramento
Department of Planning and Development
Environmental Services Division
1231 I Street, Room 301
Sacramento, CA 95814

RECEIVED

DEC 18 1996

PLANNING SERVICES

Dear Mr. Broadhead

The Land Park Community Association has reviewed portions of the Draft Environmental Impact Report for the Combined Sewer System Improvements and Rehabilitation Plan, November 1996. The report is generally acceptable, but some additional material is needed and a mitigation monitoring plan is necessary. Most of the material can be added to the final EIR in any form that is convenient for you.

7-1

The mitigation monitoring plan is required because the City has a history of lapses in fulfilling its long term commitments to our neighborhood; the lack of mitigation of increased runoff from the zoo is a typical example. Staff turnover and Council member changes are factors in this phenomenon.

7-2

Pump Station 2

Portions of the Riverside Water Treatment Plant will be demolished, according to the bottom of Page 4-8. Explain how the plant will continue to supply water to our neighborhood. If the plant is to be taken out of service, describe how we will continue to receive the present quantity and quality of water at the same pressure. Discuss the demolition of the plant in Section 7.4 Cultural Resources.

7-3

7-4

Describe the appearance of the modified facilities. Note on near the bottom of Page 4-3, that the quote from the SGPU says the facilities are to be designed for "attractiveness".

7-5

More information is needed on the screen cleaners. Describe specifically where will they be located. Disclose if they will also be added to existing pumps. Explain how the material they collect be stored and removed from the site. Describe the trucks and the route they will take.

7-6

Installation of a diesel powered generator is mentioned on Pages 2-6 and 4-8. The

7-7

generator, its housing and control of the noise it produces must be discussed. Such generators are very loud. They must be routinely tested and serviced, Which means they operate at times other than during emergencies. 7-7

Sodium hyperchloride may be used to control odors according to Page 21 of the initial study and Page 4-10. The top of Page 2-7 covers use of it and sodium bisulfate at Pioneer Reservoir and implies that they are hazardous materials. Describe their and any other chemicals use, storage, delivery, etc at Pump Station 2. 7-8

There are cellular telephone transmitters on the headhouse that would be troublesome to relocate as part of the renovation. 7-9

Odors

We took exception to your conclusion in the initial study that odors would be a less-than significant impact and still do. Page 21 of the initial study states that "... at the existing Sump 2, there have been a number of odor complaints within the vicinity.". It goes on to discuss some measures that will and may be taken to control odors. 7-10

There is no basis given for the statement near the bottom of Page 2-5 that the project would reduce and not cause new odor problems. The vague statement near the top of Page 4-10 surely does not support it. Page 3-8 mentions generation of Odors at Pump Station 2 and Figure 3-5 identifies "Foul Air Filter Units" at that station. Figure 3-6 Includes a schematic of the odor control system at Pioneer Reservoir and the system is mentioned on Page 3-10. Page 4-20 indicates that improved control of "gaseous emissions" is an objective of the work planned for the CWTP.

Noise

Section 7.3 will be more understandable with that addition of descriptive material on the plans for Pump Station 2 required above. It needs to be expanded to cover emergency generators, any other noisy equipment and traffic hauling chemicals in and screening out of the pumping stations and the CWTP. Also it needs to give the actual noise levels and not just the increments as it does in its present form. The cumulative noise impacts must be discussed in Section 9. 7-11
7-12
7-13

Zoo Runoff

The discussion, on Pages 3-10 and 12, of the combined sewer overflows is inadequate because it does not cover the situation near the zoo that is described in our August 28, 1996 letter. See Appendix 15-2. While Project XM15, listed on Page 6-2, will reduce flooding of Land Park Drive in front of the zoo and make it safer to drive, it will exacerbate the runoff problem by collecting the water that now ponds and put it in the 7-14

overloaded sewer system downstream of the zoo.

7-14

Priorities

The report says that pumping facilities are a top priority, because they are necessary to discharge the sewage that is collected to the river in order to prevent outflows into low lying neighborhoods near the pumps. We agree this construction sequence would help, but the discussion of priorities for pipe enlargements must be revised to recognize that it is also necessary to enlarge the pipes near the plants before those on higher ground to prevent those outflows.

7-15

The unique health hazards presented by zoo sewage outflows must be included in the discussions of priorities.

7-16

As primary beneficiaries of the Combined Sewer System and Rehabilitation and Improvement Plan, we want to work with you to implement it. The mitigation monitoring plan will be the vehicle for our input on the appearance of facilities constructed in our neighborhood and will assure that the facilities are designed, constructed and operated so that noise, odor and traffic impacts are tolerable. Please send us a draft as soon as it is available.

7-17

If you have any questions on our comments, please call me at 446-8950 or Don Babbitt at 442-0990.

Sincerely,



Steven A. Kahn
President

cc: Councilman Jimmie Yee
Kendra Finley

COMMENT LETTER 7: Land Park Community Association

Response to Comment 7-1

The comment notes that the Draft EIR is generally acceptable, but requires additional information including the Mitigation Monitoring Program (MMP).

A MMP will be prepared for the project once all mitigation measures are finalized, which occurs after the preparation of the Final EIR. The MMP will be adopted as part of the City's findings to approve the CSS Plan, based on the EIR. It should be noted that CEQA does not require that a MMP be circulated for public review and comment, nor is there any requirement that it be included in the Final EIR.

Response to Comment 7-2

The comment states that a MMP is required because the City has a history of lapses in fulfilling long term commitments or other stated reasons. The actual reason why a MMP must be prepared is that the Public Resources Code (Section 21081.6) requires adoption of a MMP for all projects where mitigation measures are adopted as part of project approval. A MMP identifies for each mitigation measure the timing requirements, responsibility for implementation, responsibility for monitoring and responsibility for enforcement.

Response to Comment 7-3

The commentor correctly states that portions of the Riverside Water Treatment Plant (RWTP) would be demolished to make improvements to Pump Station 2. The RWTP, however, has not been utilized by the City for water treatment for many years, so demolishing portions of the RWTP would not affect the supply of water to the commentor's neighborhood.

Response to Comment 7-4

The commentor requests that the demolition of the RWTP be discussed in the Cultural Resources section of the Draft EIR.

As discussed in the Cultural Resources section, the RWTP is not considered an historic resource. Page 7.4-4 of the Draft EIR states the only resources that may be of concern subject to impact are the brick sewers. Further, page 7.4-13 states that the features to be demolished at the RWTP (filter basin and clarifier/contact basin) are not of the same era as Pump Station 2 and do not substantially affect the historic context of Pump Station 2.

Response to Comment 7-5

The commentor requests a description of the appearance of modified facilities.

Architectural design of the facilities would not be available until the City Council approves the Phase 1 design development contract,² which would occur after this Final EIR is certified.

The majority of modifications would take place within existing facilities and new facilities would not be substantially different in visual character compared to other surrounding municipal facilities. The City has stated that any new facility would be designed to be architecturally compatible with surrounding buildings. To assure this, any proposed modifications to the exterior of historically significant structures will require review and approval by the City's Design and Preservation Review Board.

Response to Comment 7-6

The commentor requests additional information on the screen cleaners.

The commentor is referred to page 4-11 of the Draft EIR, Project Description. As noted in the table, the screens will be installed inside the new pump station. Presently, the screens are cleaned manually with water and pitch forks. With implementation of the CSS Plan, the screens would be automated, performing the same cleaning function automatically. The number and type of trucks required to haul away debris would remain the same. The truck routes would also be the same.

Response to Comment 7-7

The commentor requests that the diesel generators be discussed in terms of noise impacts.

As noted by the commentor, these generators would require periodic maintenance and service. According to the Department of Utilities, the generators would be tested once a month.³ The commentor is referred to page 30 of the Initial Study (Appendix 15-1 in the Draft EIR), which concludes that since the generators would be located within solid enclosures and would operate for brief periods of time a significant increase in noise level would not occur. This would apply to both emergency and maintenance-related operation of the generators. It should be noted that the City Noise Control Ordinance specifically exempts emergency power generators (see page 30 of the Initial Study).

Response to Comment 7-8

The commentor requests a description of the chemicals that would be used at Pump Station 2.

As stated on page 27 of the Initial Study, Pump Station 2, which would be located at the RWTP, would utilize sodium bisulfite to reduce residual chlorine concentration and sodium hypochlorite to reduce odor. The discussion further provides that in addition to these chemicals, the RWTP currently uses chlorine gas. Although chlorine gas is currently used to prevent odor (contained in one-ton above ground tanks), it would eventually be phased out with implementation of the CSS Plan. The chemicals would be stored in four 10,000 gallon above ground tanks that would be installed inside a concrete block spill containment area. Proposed changes to both pumping stations involve the use of generators for which diesel or gas may be used. Some lubricating oils, which may contain hazardous material, may also be present for routine operation and maintenance. It should be noted that the chemicals listed above are commonly used in treatment facilities. The use, storage and handling of these

with existing federal, state and local regulations. As a result, no significant impacts would occur from implementation of the CSS Plan (see pages 27 and 28 of the Initial Study).

Response to Comment 7-9

The comment states that cellular telephone transmitters would be removed and relocated as part of the CSS Plan.

The cellular phone antennas that exist on the RWTP headhouse would remain in their existing locations. The headhouse would remain on the site. As stated on page 4-10 of the Draft EIR, the existing headhouse would be remodeled to accommodate the proposed lockers/restroom facility. As such, only interior modifications would occur.

Response to Comment 7-10

The comment notes disapproval of the conclusions drawn regarding odor.

As noted on page 3-8 of the Draft EIR, because of this constrained depth of the Pump Station 2 wet well, the two 60-inch and the 108-inch influent sewers cannot be fully drained leaving approximately two to three feet of combined sewage in the sewers. During the summer, when flows in the CSS are small and mostly sanitary sewage, the combined sewage accumulates and becomes stagnant causing the generation of odor. The CSS Plan proposes an increase in pumping capacity and a new wet well that would be capable of removing all of the combined sewage from all four interceptors entering Pump Station 2, thereby substantially reducing odors (see page 22 of the Initial Study). Sodium hypochlorite would also be utilized at both Pump Station 2 and Pioneer Reservoir to reduce odor. Therefore, the CSS Plan would improve, not exacerbate, the existing odor problem by providing more effective solids removal and odor control.

Response to Comment 7-11

The commentor requests additional information on traffic and emergency generator noise.

As concluded on page 22 of the Initial Study, the CSS Plan would not generate additional vehicle trips. As a result, no increases in vehicle noise associated with the CSS Plan would occur over what currently exists today.

Regarding emergency generator noise, please see Response to Comment 7-7.

Response to Comment 7-12

The commentor questions the presentation of the noise level measurement data.

A noise survey was conducted for the EIR noise analysis. Actual noise levels were measured at the RWTP site as presented in Table 7.3-1 on page 7.3-3 of the Draft EIR.

Response to Comment 7-13

The commentor requests that cumulative noise impacts be addressed in Chapter 9.

Chapter 9 serves as a summary of cumulative impacts and therefore simply lists cumulative impact statements with no discussion. Complete discussions of cumulative impacts are provided in detail throughout Chapter 7 of the Draft EIR. The commentor is referred to page 7.3-6 which addresses cumulative noise impacts (from screen cleaners). This impact is found to be less-than-significant. It should be noted, as summarized on page 2-7 of the Draft EIR, the Initial Study concluded that significant long-term noise impacts would not occur from implementation of the CSS Plan, with the possible exception of the screen cleaners.

Response to Comment 7-14

The comment raises issues related to drainage facilities serving the Sacramento Zoo.

The commentor is correct that the flooding volume which is currently in front of the zoo would be shifted downstream. However, although an increase would occur at this point it would not be a net increase in flows.

There are two phases planned to solve the significant flooding problem in the vicinity of Holy Spirit School and the zoo. Under Phase I, which is Project XM15, flows from the northeast corner of the zoo and flows that enter the east side of the zoo would be redirected, via a new 15-inch pipe down Land Park Drive, to an existing 15-inch pipe. This pipe provides drainage for the rest of the zoo and the area to the west, including Holy Spirit School. The intent of this first phase (Project XM15) is to eliminate the problem of flooding that occurs on a portion of Land Park Drive.

The second phase will involve construction of a 60-inch pipe from the confluence of the new 15-inch pipe and the existing 15-inch pipe that would direct these flows directly to new Pump Station 2. Since the 60-inch pipe would be lower than existing Pump Station 2, it would not be effective without construction of the new Pump Station 2. For this reason, the second phase must be implemented after CSS Plan Phase I (construction of Pump Station 2). However, the second phase is planned to be implemented during 1998.

Although the XM15 Project would result in a minor increase in runoff that enters the system in front of the zoo, it would be a temporary increase and necessary only until the second phase can be implemented. The City does not consider the additional volume temporarily created by Project XM15 to be of a magnitude that could significantly exacerbate the current problem. In sum, this is an issue of timing and the City believes that implementation of the CSS Plan components and CIPs have been properly prioritized.

It should be noted that CIPs, including Project XM15, are not part of the CSS Plan, but are identified in the Draft EIR for informational purposes. As noted on page 6-1 of the Draft EIR, these types of projects (as identified on Table 6-1 in the Draft EIR) involve the minor alteration of existing public facilities in order to provide public utility services. Such projects

are considered as Categorical Exemptions under CEQA, Section 15301(b). It is expected that the second accompanying phase to Project XM15 would also be considered exempt.

Response to Comment 7-15

The commentor questions how the improvements are prioritized.

The City acknowledges that implementation of the improvements must be timed in such a way as to not create additional outflows or other system problems. Upsizing of the sewer mains that connect with the pumping stations would be done at the same time or before the pump station construction. Please also see Response to Comment 7-14.

Response to Comment 7-16

See Response to Comment 7-14 regarding the timing of CIPs in the zoo area and CEQA review for CIPs.

Response to Comment 7-17

The commentor requests that the Land Park Community be involved with the implementation of the MMP.

CEQA does not require that a MMP be circulated for public review and comment. However, it will be available to the public at the City Department of Planning and Development located at 1231 I Street Room 300 at the end of February. The City, as the Lead Agency, is required to verify compliance with the MMP. The MMP will be adopted as part of the City's findings to approve the CSS Plan, based on the EIR. Implementation of the MMP, including monitoring of mitigation measures, does not involve the public.

ENDNOTES

1. Rick Batha, City of Sacramento Senior Engineer and John Tomko, P.E., personal communication, January 27, 1997.
2. Ibid.
3. Ibid.