

**RALEY BOULEVARD TRUCK SERVICE AND PARKING FACILITY
(DR23-215)**

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

Prepared by

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

With technical support from

HELIX Environmental Planning, Inc.
1180 Iron Point Road, Suite 130
Folsom, CA 95630
Attn: Robert Edgerton, Principal Planner

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SECTION 1: INTRODUCTION

The City of Sacramento (City), as lead agency, released the Initial Study/Mitigated Negative Declaration (IS/MND) for the Raley Boulevard Truck Service and Parking Facility project (DR23-215) at 5221 Raley Boulevard, Sacramento (project) for public review from August 20, 2024 to September 19, 2024, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15105. The IS/MND and supporting documents are available at the City of Sacramento, Community Development Department, located at 300 Richards Boulevard, 3rd Floor, Sacramento, California 95811 and at the Sacramento Public Library's Central Branch, located at 828 I Street, Sacramento, California 95814. The IS/MND is also available online at <https://www.cityofsacramento.gov/community-development/planning/environmental/impact-reports>.

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

This document is organized into three sections:

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

The Final IS/MND includes the following contents:

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

SECTION 2: RESPONSES TO WRITTEN COMMENTS

2.1 INTRODUCTION

In accordance with CEQA Guidelines Section 15088, the City, as the lead agency, evaluated the comments received on the IS/MND for the Raley Boulevard Truck Service and Parking Facility 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 CEQA Guidelines Section 15132.

2.2 LIST OF COMMENTERS

The City received five (5) comment letters on the IS/MND during the 30-day comment period from August 20, 2024 to September 19, 2024. 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 five (5) comment letters are as follows:

Commenter	Author Code
California Department of Transportation, dated September 11, 2024.....	Cal Trans
Central Valley Regional Water Quality Control Board, dated September 17, 2024.....	CVRWQCB
Sacramento Area Sewer District, dated September 3, 2024.....	SacSewer
Central Valley Flood Protection Board, dated September 11, 2024.....	CVFPB
Sacramento Metropolitan Air Quality Management District, dated September 13, 2024.....	SMAQMD

2.3 RESPONSES TO COMMENTS

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

RALEY BOULEVARD TRUCK SERVICE AND PARKING FACILITY (DR23-215)
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

2.3.1 Letter A: California Department of Transportation–District 3, September 11, 2024

From: [Dhatt, Satwinder K@DOT](mailto:Dhatt.Satwinder.K@DOT) on behalf of [D3 Local Development@DOT](mailto:D3.LocalDevelopment@DOT)
To: [Ron Bess](mailto:Ron.Bess); [Deja Harris](mailto:Deja.Harris); [Garrett Norman](mailto:Garrett.Norman)
Cc: [Scott Johnson](mailto:Scott.Johnson); [Arnold, Gary S@DOT](mailto:Arnold.Gary.S@DOT)
Subject: RE: Notice of Availability/Intent for the Raley Truck Service and Parking Facility Project (DR23-215)
Date: Wednesday, September 11, 2024 1:12:47 PM

Hi Ron,

Thank you for including the California Department of Transportation in the review process for Raley Truck Service and Parking Facility Project (DR23-215). We wanted to reach out and let you know that we have no comments at this time.

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.

Should you have questions please contact me, Local Development Review and System Planning Coordinator, by phone (530) 821-8261 or via email at D3.local.development@dot.ca.gov.

Thank you!

Satwinder Dhatt
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3
703 B Street, Marysville, CA 95901
(530) 821-8261

From: Ron Bess <RBess@cityofsacramento.org>
Sent: Tuesday, August 20, 2024 10:58 AM
To: [Deja Harris](mailto:Deja.Harris) <DNHarris@cityofsacramento.org>; [Garrett Norman](mailto:Garrett.Norman) <GNorman@cityofsacramento.org>
Cc: [Scott Johnson](mailto:Scott.Johnson) <SRJohnson@cityofsacramento.org>; [Ron Bess](mailto:Ron.Bess) <RBess@cityofsacramento.org>
Subject: Notice of Availability/Intent for the Raley Truck Service and Parking Facility Project (DR23-215)

EXTERNAL EMAIL. Links/attachments may not be safe.

Good Morning,

This email is to inform you that the City of Sacramento, Community Development Department, as Lead Agency, has issued a **Notice of Availability/Intent to Approve the Raley Boulevard Truck Service and Parking Facility Project (DR23-215)**.

Response to Caltrans Comment A-1

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

RALEY BOULEVARD TRUCK SERVICE AND PARKING FACILITY (DR23-215)
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

2.3.2 Letter B: Central Valley Regional Water Quality Control Board, September 17, 2024



Central Valley Regional Water Quality Control Board

17 September 2024

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

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, RALEY BOULEVARD TRUCK SERVICE AND PARKING FACILITY PROJECT (DR23-215), SCH#2024080781, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 20 August 2024 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 Boulevard Truck Service and Parking Facility Project (DR23-215), 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

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

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

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adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsir_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

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State Water Resources Control Board website at:

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

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Control Board website at:

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

Dewatering Permit

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

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

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/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/>

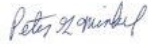
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If you have questions regarding these comments, please contact me at (916) 464-4684
or Peter.Minkel2@waterboards.ca.gov.



Peter G. Minkel
Engineering Geologist

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

Response to CVRWQCB Comment B.1

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

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2.3.3 Letter C: Sacramento Area Sewer District, September 3, 2024



10080 Goethe Road
Sacramento, CA 95827-8559
Tel 916.476.6000
Fax 916.476.6160
www.sacsewer.com

September 3, 2024

Mr. Ron Bess
City of Sacramento – Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Subject: NOTICE OF AVAILABILITY/INTENT TO ADOPT A MITIGATED
NEGATIVE DECLARATION FOR THE RALEY BOULEVARD TRUCK
SERVICE/REPAIR FACILITY PROJECT

File No: DR23-215

Dear Mr. Bess,

The Sacramento Area Sewer District (SacSewer) has reviewed the subject document and has the following comments.

The proposed project involves building a truck service and repair facility, including a 6,090-sq.ft. warehouse building and 150 truck stalls, on a vacant 6.26-acre parcel at 5221 Raley Boulevard in the Light Industrial zone.

Note: Effective January 1, 2024, the Sacramento Regional County Sanitation District and the Sacramento Area Sewer District merged into one district called the Sacramento Area Sewer District, or SacSewer for short.

The City of Sacramento (City) is responsible for providing local sewer service to the proposed project site via its local sanitary sewer collection system. SacSewer is responsible for conveying sewage from the City collection system to the EchoWater Resource Recovery Facility for treatment, resource recovery, and disposal.

- *References to the Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Regional Wastewater Treatment Plant (SRWTP) are to be revised to accurately reflect the service provider. SRCSD is to be referenced as SacSewer, and the SRWTP is to be referenced as the EchoWater Resource Recovery Facility (EchoWater Facility) throughout the document. The City is responsible for providing sewer service to the project site. Please revise the wastewater section to accurately reflect this.*

The City's service area is provided conveyance via Sump 2/2A and the SacSewer City Interceptor system. The project proponents will need to quantify the cumulative impacts of the proposed Project to ensure that wet and dry weather capacity limitations within Sump 2/2A and the City Interceptor are not exceeded.

www.sacsewer.com

Board of Directors
Representing:
County of Sacramento | City of Citrus Heights
City of Elk Grove | City of Folsom
City of Rancho Cordova | City of Sacramento
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Christopher Dobson
General Manager/District Engineer
Rosemary Clark
Director of Collection System Operations
Sonny Luvulis
Director of EchoWater Operations

Mike Huot
Director of Policy & Planning
Matthew Dagle
Director of Internal Services

Masiku Tepe Banda
Director of Finance
Nicole Coleman
Director of Communications

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Mr. Ron Bess
Raley Boulevard Truck Service Facility
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On March 13, 2013, SacSewer approved the Wastewater Operating Agreement between SacSewer and the City.

<i>Service Area</i>	<i>Flow Rate (MGD)</i>
<i>Combined Flows from Sump 2 and Sump 2A</i>	<i>60</i>
<i>Combined flows from Sumps 2, 2A, 2I, 5S, and 119</i>	<i>98</i>
<i>Total to City Interceptor of combined flows from Sumps 2, 2A, 2I, 5S, 119, and five trunk connections</i>	<i>108.5</i>

SacSewer is not a land-use authority and plans and designs its sewer systems using information from land-use authorities. SacSewer bases the projects identified within its planning documents on growth projections provided by these land-use authorities.

In February 2013, the SacSewer Board of Directors adopted the Interceptor Sequencing Study (ISS). The ISS is on the SacSewer website at System Capacity Plans—.

Customers receiving service from SacSewer are responsible for rates and fees outlined within the latest SacSewer ordinance. Fees for connecting to the sewer system recover the capital investment of sewer and treatment facilities that serve new customers. SacSewer does not guarantee sewer service or system capacity to the property until the property obtains proper permits to connect to the system and pays all facility impact (capacity) fees. The SacSewer ordinances are on the SacSewer website at [Ordinances - Sacramento Area Sewer District \(sacsewer.com\)](http://www.sacsewer.com).

If you have any questions regarding these comments, please call me at (916) 876-6104.

Sincerely,

Robb Armstrong

Robb Armstrong
Policy & Planning

Response to Sacramento Area Sewer District Comment C.1

The commenter provided a standard response form letter during the public response period. References to the Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Regional Wastewater Treatment Plant (SRWTP) in the IS/MND have been revised to reference SacSewer in place of SRCSD and the EchoWater Resource Recovery Facility (EchoWater Facility) in place of SRWTP. The following has been added to page 93 of the IS/MND: “[The City of Sacramento provides wastewater collection for approximately two-thirds of the area within the City limits], and is responsible for providing sewer service to the project site.” The applicant will incorporate requirements as it relates to sewer facilities, and will coordinate with SacSewer to obtain permits, as necessary.

The IS/MND prepared for the proposed project analyzed the delta between the proposed development of the subject property versus that which was envisioned for development under the City’s General Plan Master EIR. The City determined that the growth projection for the project site was previously included and analyzed in the General Plan Master EIR and thus is included in the flow rate outlined above.

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2.3.4 Letter D: Central Valley Flood Protection Board, September 11, 2024

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STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY
CENTRAL VALLEY FLOOD PROTECTION BOARD
3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609

GAVIN NEWSOM, GOVERNOR



September 11, 2024

Ron Bess
Associate Planner
City of Sacramento, Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
Rbess@cityofsacramento.org

Subject: Comments for the Initial Study/Mitigated Negative Declaration, Raley Boulevard Truck Service and Parking Facility Project (DR23-215), SCH# 2024080781, Sacramento County

Dear Ron Bess,

The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Raley Boulevard Truck Service and Parking Facility Project (DR23-215) (proposed project).

The proposed project involves constructing a two-story truck repair facility with a mechanic shop and parking lot for trucks and trailers, landscaping, and concrete sidewalk surrounding the building. The proposed project is located in the Magpie Creek Diversion channel, a federally regulated channel that is within the Board's permitting authority, therefore an encroachment permit may be required. Board permit information is available on the [Permitting at the Central Valley Flood Protection Board website](#).

Responsibility of the Central Valley Flood Protection Board

The Board is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. The Board serves as the State coordinator between local flood management agencies and the federal government, with the goal of providing the highest level of flood protection possible to California's Central Valley.

The Board operates under authorities as described in California Water Code (Water Code), which requires the Board to oversee future modifications or additions to facilities of the State Plan of Flood Control (SPFC). In addition, pursuant to assurances provided to the United States Army Corps of Engineers (USACE) by the Board on behalf of the State, the USACE Operation and Maintenance Manuals, Code of Federal Regulations, Title 33, Section 208.10, and United States Code, Title 33, Section 408, the Board is responsible for the operation and maintenance of the SPFC facilities. The USACE requires the Board to serve as the lead non-Federal sponsor for projects to improve or alter facilities of the SPFC pursuant to Code of Federal Regulations, Title 33, Section 408. The State's objectives include fulfilling the USACE's expectations pursuant to the assurances provided to the USACE.

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City of Sacramento, Community Development Department
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Encroachment Permit

Per California Code of Regulations, Title 23, Waters, Division 1 (Title 23), Section 6, approval by the Board is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within the Board's jurisdiction. In addition, Board approval is required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream identified in Title 23, Table 8.1. Specifically, Board jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside Board's Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by Board staff, are also under the Board's jurisdiction. Permits may also be required for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.

Federal permits, including USACE Section 404 and Section 10 regulatory permits and Section 408 Permission, in conjunction with a Board permit, may be required for the proposed project. In addition to federal permits, state and local agency permits, certification, or approvals may also be required. State approvals may include, but are not limited to, California Department of Fish and Wildlife's Lake and Streamed Alteration Agreement and Central Valley Regional Water Quality Control Board's Section 401 Water Quality Certification and/or Waste Discharge Requirement. The Applicant must obtain all authorizations that the proposed project may require.

Flood Impacts Analysis

Pursuant to Section 15 of Title 23, the Board may deny an encroachment permit if the proposed project could:

- Jeopardize directly or indirectly the physical integrity of levees or other works
- Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided
- Cause significant adverse changes in water velocity or flow regimen
- Impair the inspection of floodways or project works
- Interfere with the maintenance of floodways or project works
- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities
- Increase the damaging effects of flood flows
- Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control
- Adversely affect the State Plan of Flood Control, as defined in the California Water Code

The Board, as a Responsible Agency under the California Environmental Quality Act (CEQA), will review and consider the environmental effects of the proposed project identified in the IS/MND, and will reach its own conclusions on whether and how to approve the project involved (14 CCR 15096, subd. (a)). This includes direct impacts to facilities under construction, as well as indirect impacts from the proposed project to surrounding facilities. Accordingly, the

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City of Sacramento, Community Development Department
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comments herein are intended to assist in the development of a robust CEQA document capable of supporting the Board's permitting process.

Closing

The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the water ways. Board staff is available to discuss any questions you have regarding the above comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@CVFlood.ca.gov if you have any questions.

Sincerely,

Jamie Silva

Jamie Silva
Environmental Program Manager

cc: Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Response to CVFPB Comment D.1

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

RALEY BOULEVARD TRUCK SERVICE AND PARKING FACILITY (DR23-215)
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

**2.3.5 Letter E: Sacramento Metropolitan Air Quality Management District,
September 13, 2024**



September 13, 2024

AQMD No: SAC202203073

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

**Re: Comment Letter for Notice of Availability/Intent to Approve: 5301 Raley Blvd
Warehouse (DR23-215) – Mitigated Negative Declaration and Appendices**

Dear Ron,

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Notice of Availability/Intent to Approve, along with the Initial Study/Mitigated Negative Declaration for the Raley Boulevard Truck Service & Repair project. The request is for constructing a truck service and repair facility, which includes a 6,090 square foot warehouse building and 150 truck parking stalls on a vacant parcel of approximately 6.266 acres in the Light Industrial (M-1S-R) Zone. Please accept the following comments and recommendations to with considerations to benefit air quality and public health.

Cleaner Energy

Policies in the City's Climate Action & Adaptation Plan call for transitioning buildings to all carbon-free energy such as renewable electricity. Further, buildings with carbon-free energy provide substantial public health benefits. To develop a healthier project and ensure that the project is consistent with measure E-2 of the City's [Climate Action & Adaptation Plan](#), Sac Metro Air District commends the project on including an all-electric infrastructure in the design with carbon-free energy and infrastructure.

Electric Vehicle Charging Space

The 2022 California Green Building Standards Code (CalGreen) requires EV charging spaces for new construction, which facilitate future installation and use of electric vehicle charging equipment. [CalGreen Chapter 5, Nonresidential Mandatory Measures, Section 5.106.5.3](#), provides guidance on electric vehicle charging space quantity and other requirements for nonresidential uses.

- Sac Metro Air District recommends that this project meet minimum CalGreen requirements, by providing at least 3 EV capable spaces for light-duty parking.

California Air Resources Board adopted the [Advanced Clean Trucks Regulation in 2020](#), requiring manufacturers of medium- and heavy-duty trucks to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. This project

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Raley Blvd Truck Service & Parking: SAC202203073

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anticipates on adding an estimated 150 truck and trailer parking spaces along with 9 light-duty parking spaces for employees/visitors.

- To support the State's regulation to increase zero-emission fleet, Sac Metro Air District recommends that heavy-duty truck parking storage spaces be equipped with the basic infrastructure to allow future charging of electric zero-emission medium and heavy-duty trucks. This infrastructure should include the installation of conduits and other structural improvements. California Air Resources Board offers program that can provide incentive funds for both vehicles and infrastructure, including the [Carl Moyer Program](#) and the [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project](#). You may contact Sac Metro Air District staff at 800-880-9025 or visit [Sac Metro Air District's Infrastructure Incentive Program](#) online for more information on local Carl Moyer Program funding.

Truck Idling

The project will primarily service heavy-duty trucks. Under California Code of Regulations (CCR) requirements to minimize idling time for diesel-powered equipment and vehicles, either by shutting them off when not in use or reducing the time of idling to 5 minutes. These requirements are in CCR Title 13, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and Chapter 10, Article 1, §2485.

- Sac Metro Air District recommends the project to prominently post signage informing project users of CCR requirements.

Urban Heat Island

The Capital Region Transportation Sector Urban Heat Island Mitigation Project (UHI Project) report on urban heat island effect impacts on the Sacramento region, and mitigation strategies for these impacts, identifies the urban heat island effect as a serious challenge for our region. According to the report, developed areas in Sacramento range 3 to 9 degrees Fahrenheit warmer than surrounding areas, which results in decreased air quality and associated public health impacts. The urban heat island results from the conversion of undeveloped land to developed land.

- Sac Metro Air District suggests incorporating the following measures for cool roofs and pavement, and tree shading, into this project.
 - All new structures should utilize certified cool roofs. The 2022 California Green Building Standards Code Title 24, Part 11 [Item A5.106.11](#), suggests an aged solar reflectance of at least 0.68 and a minimum thermal emittance of 0.85 for low-sloped roofs and at least 0.28 for steep-sloped roofs, with a minimum thermal emittance of 0.85.
 - Because this project would pave acres of land with relatively low opportunity for tree shading due to truck maneuvering needs, it has high potential to contribute to the urban heat island effect. Sac Metro Air District recommends utilizing "cool pavement" for new outdoor pavement, with the highest albedo possible, but no less than 0.25. For guidance on cool pavement strategies, please visit Sac Metro Air District's [Recommended Cool Pavement Strategies](#).
 - Project landscaping should incorporate new trees to shade new pavements at the fullest extent possible, to reduce urban heat island effect impacts.

Other comments

Table 1 lists Sac Metro Air District's Thresholds of Significance for pollutants under construction and operational phases.

- It is important to note that construction PM_{2.5} lists "82" but should be notated as "82¹" with the same footnote that states "PM thresholds are zero (0) unless all feasible Best Available Control Practices/Best Management Practices are applied."

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[AirQuality.org](#)

RALEY BOULEVARD TRUCK SERVICE AND PARKING FACILITY (DR23-215)
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- The table also states that SO₂ has a threshold of significance of "1-hour average \geq 0.075 ppm", however, it is incorrect. Please refer to [Sac Metro Air District Thresholds of Significance Table](#) for the most up-to-date standards for all CEQA, land development, and construction projects, which includes stationary sources.

Acronym consistency for Sac Metro Air District *Basic Construction Emissions Control Practices*.

- The first mention of the Basic Construction Emissions Control Practices states "BCECP" as the preferred acronym, however, there are also mentions of "BCEP" and "BCEP" assumed to be referring to "BCECP". Please update accordingly.

Construction

All projects are subject to Sac Metro Air District rules and regulations in effect at the time of any construction that may occur. Please visit our website to find a [list of the most common rules that apply at the construction phase of projects](#). This includes measures from Sac Metro Air District's [Basic Construction Emission Control Practices](#) and measures to ensure equipment efficiency and control fugitive dust.

If you have any questions, please contact me at ctran@airquality.org or (916)704-0550 for further clarification.

Sincerely,



Carolyn Tran
Assistant Air Quality Planner | Analyst

Cc: Paul Phillely, AICP – CEQA & Land Use Program Supervisor – Sac Metro Air District

Response to SMAQMD Comment E1:

The commenter provided a standard response form letter during the public response period. Proposed project improvements recommended by SMAQMD, such as the number of Electric Vehicle (EV) charging stations, will be taken under advisement. All proposed improvements shall meet or exceed City code requirements. The Final IS/MND has been revised, as presented below in strikeout/underline mode, to correct the inadvertent errors relevant to air quality thresholds of significance as identified in the comment letter; in addition, corrections have been made to the acronym spelling errors for BCECP.

SECTION 3: REVISIONS TO IS/MND

3.1 OVERVIEW

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

Based on the comments received on the IS/MND prepared for the proposed project (released for public review on August 20, 2024), as well as staff-initiated changes, the following revisions have been made to the IS/MND.

SECTION 2 AIR QUALITY

In response to Letter E, SMAQMD, the following text has been added to Table 1, on page 17 of the IS/MND:

**Table 1
SMAQMD THRESHOLDS OF SIGNIFICANCE**

Pollutant	Construction	Operation
Mass Daily Thresholds (pounds per day)		
ROG	None	65
NO _x	85	65
PM ₁₀	80 ¹	80 ¹
PM _{2.5}	82 ¹	82 ¹
Toxic Air Contaminants		
TACs	Maximum Incremental Cancer Risk ≥ 10 in 1 million Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Ambient Air Quality for Criteria Pollutants		
NO ₂	1-hour average ≥ 0.18 ppm Annual average ≥ 0.03 ppm	
CO	1-hour average ≥ 20.0 ppm (state) 8-hour average ≥ 9.0 ppm (state/federal)	
SO ₂	1-hour average ≥ 0.075 <u>0.25</u> ppm 24-hour average ≥ 0.04 ppm	
Lead	1.5 µg/m ³ 30-day average	

Source: SMAQMD 2020b

¹ PM thresholds are zero (0) unless all feasible Best Available Control Practices/Best Management Practices are applied. lbs./day = pounds per day; VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; PM₁₀ = respirable particulate matter with a diameter of 10 microns or less; PM_{2.5} = fine particulate matter with a diameter of 2.5 microns or less; SO_x = sulfur oxides; TACs = toxic air contaminants; GHG = greenhouse gas emissions; MT/yr = metric tons per year; CO_{2e} = carbon dioxide equivalent; NO₂ = nitrogen dioxide; ppm = parts per million; µg/m³ = micrograms per cubic meter

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In response to Letter E, SMAQMD, the following text has been added under “Question B” on page 20 of the IS/MND:

As shown in Table 2, project construction emissions of criteria pollutants and precursors would not exceed the SMAQMD significant thresholds. Regardless of emission levels, SMAQMD considers construction period PM₁₀ and PM_{2.5} emissions to be significant unless a set of ~~Basic Construction Emissions Control Practices (BCECPs)~~ is implemented, considered by the SMAQMD to be feasible for controlling fugitive dust from a construction site (SMAQMD 2019). Implementation of the BCECPs allows the use of the non-zero particulate matter significance thresholds and can be included as conditions of approval or mitigation measures. General Plan Policy ERC-4.5, Construction Emissions, requires implementation of the SMAQMD’s BCECPs, which are included as Mitigation Measure AQ-1.

The following text would be added under “MITIGATION MEASURES” on page 22:

AQ-1 Standard Conditions of Approval (below) and are from the SMAQMD BCECP’s and would apply to the proposed project.

SECTION 15 UTILITIES

In response to Letter C, SacSewer, the following text would be added under the “*Environmental Setting*” heading on page 93 of the IS/MND:

Water Supply

Water service for the project would be provided by the City of Sacramento. The City provides domestic water service from a combination of surface water and groundwater sources: the American River, Sacramento River, and groundwater wells (pumped from the North and South American Subbasins). Water from the American River and Sacramento River is diverted by two water treatment plants: the ~~Sacramento River Water Treatment Plant (SRWTP)~~, EchoWater Resource Recovery Facility (EchoWater Facility), located at the southern end of Bercut Drive approximately 6-miles southwest of the project site, and the E.A. Fairbairn Water Treatment Plant (FWTP), located at the northeast corner of State University Drive South and College Town Drive approximately 9-miles southeast of the project site. The FWTP and the ~~SRWTP~~ EchoWater Facility divert from the Sacramento and American Rivers is treated, stored in storage reservoirs, and pumped to customers via a conveyance network.

Wastewater

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