

Appendix G

Comments and Responses



March 28, 2016

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Claudia Goss

Public Affairs Manager

www.srcsd.com

Subject: Notice of Availability/Intent to Adopt – Mitigated Negative Declaration for Sacramento Senior Living at Woodlake Project (P15-041)

Dear Mr. Johnson:

Sacramento Regional County Sanitation District (Regional San) has the following comments regarding the Mitigated Negative Declaration for the Sacramento Senior Living at Woodlake Project.

Regional San is not a land-use authority. Projects identified within Regional San planning documents are based on growth projections provided by land-use authorities. Sewer studies will need to be completed to assess the impacts of any project that has the potential to increase flow demands. Onsite and offsite impacts associated with constructing sanitary sewer facilities to provide service to the subject project should be included in this environmental impact report.

Customers receiving service from Regional San are responsible for rates and fees outlined within the latest Regional San ordinances. Fees for connecting to the sewer system are set up to recover the capital investment of sewer and treatment facilities that serves new customers. The Regional San ordinance is located on the Regional San website at <http://www.srcsd.com/ordinances.php>.

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

The SRWTP provides secondary treatment using an activated sludge process. Incoming wastewater flows through mechanical bar screens through a primary sedimentation process. This allows most of the heavy organic solids to settle to the bottom of the tanks. These solids are later delivered to the digesters. Next, oxygen is added to the wastewater to grow naturally occurring microscopic organisms, which consume the organic particles in the wastewater. These organisms eventually settle on the bottom of the secondary clarifiers. Clean water pours off the top of these clarifiers and is chlorinated, removing any pathogens or other harmful organisms that may still exist. Chlorine disinfection occurs while the wastewater travels through a two mile "outfall" pipeline to the Sacramento River, near the town of Freeport, California. Before entering the river, sulfur dioxide is added to neutralize the chlorine. The design of the SRWTP and collection system was balanced to have SRWTP facilities accommodate some of the wet weather flows while minimizing idle SRWTP facilities during dry weather. The SRWTP was designed to accommodate some wet weather flows while the storage basins and interceptors were designed to accommodate the remaining wet weather flows.

Mr. Scott Johnson

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A NPDES Discharge Permit was issued to Regional San by the Central Valley Regional Water Quality Control Board (Water Board) in December 2010. In adopting the new Discharge Permit, the Water Board required Regional San to meet significantly more restrictive treatment levels over its current levels. Regional San believed that many of these new conditions go beyond what is reasonable and necessary to protect the environment, and appealed the permit decision to the State Water Resources Control Board (State Board). In December 2012, the State Board issued an Order that effectively upheld the Permit. As a result, Regional San filed litigation in California Superior Court. Regional San and the Water Board agreed to a partial settlement in October 2013 to address several issues and a final settlement on the remaining issues were heard by the Water Board in August 2014. Regional San began the necessary activities, studies and projects to meet the permit conditions. The new treatment facilities to achieve the permit and settlement requirements must be completed by May 2021 for ammonia and nitrate and May 2023 for the pathogen requirements

Regional San currently owns and operates a 5-mgd Water Reclamation (WRF) that has been producing Title 22 tertiary recycled since 2003. The WRF is located within the SRWTP property in Elk Grove. A portion of the recycled water is used by Regional San at the SRWTP and the rest is wholesaled to the Sacramento County Water Agency (SCWA). SCWA retails the recycled water, primarily for landscape irrigation use, to select customers in the City of Elk Grove. It should be noted that Regional San currently does not have any planned facilities that could provide recycled water to the proposed project or its vicinity. Additionally, Regional San is not a water purveyor and any potential use of recycled water in the project area must be coordinated between the key stakeholders, e.g. land use jurisdictions, water purveyors, users, and the recycled water producers.

If you have any questions regarding these comments, please feel free to contact me at 916-876-6104 or by email: armstrongro@sacsewer.com.

Sincerely,



Robb Armstrong
Regional San Development Services & Plan Check

cc: SASD Development Services



April 21, 2016

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

Subject: Mitigated Negative Declaration (MND), Sacramento Senior Living (P15-041)

Dear Mr. Johnson,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the MND, Sacramento Senior Living (P15-041). SMUD is the primary energy provider for Sacramento County and the proposed project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the MND, Sacramento Senior Living (P15-041) will acknowledge any project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <https://www.smud.org/en/business/customer-service/support-and-services/design-construction-services.htm>
 - <https://www.smud.org/en/do-business-with-smud/real-estate-services/transmission-right-of-way.htm>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change

Based on our review of the Initial Study and our understanding of the proposed project, SMUD offers the following input:

1. **Project Description:** SMUD would like to be informed of any anticipated project related impacts on existing or future SMUD facilities. It is important that information regarding potential impacts to SMUD facilities in the vicinity of the proposed project

be contained in the project description chapter of the MND, as well as the existing conditions discussion of the utilities, hazards and hazardous materials, and cumulative impact sections.

2. Project Schedule: SMUD would like to see a discussion of the project schedule. Specifically, SMUD needs to be able to provide effective service to the proposed project throughout development and operation.

3. Energy Delivery (Capacity): Please continue to coordinate with SMUD staff regarding the proposed energy delivery assumptions associated with the proposed project site. The MND should provide analysis regarding SMUD's ability to handle the project's anticipated energy needs. SMUD is looking forward to partnering with the City to ensure that the project is designed in an energy efficient and sustainable way.

4. Energy Delivery (Infrastructure): The MND should provide an analysis of the proposed on-site and off-site energy infrastructure improvements needed to construct and operate the proposed project. The MND should clearly delineate the responsibilities of SMUD and the City of Sacramento, as it pertains to infrastructure improvements.

SMUD would like to be kept apprised of the planning, development, and completion of the Sacramento Senior Living (P15-041). We aim to be partners in the efficient and sustainable delivery of the proposed project. Please ensure that the information included in this response is conveyed to the project planners and the appropriate project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this project. Again, we appreciate the opportunity to provide input on the Initial Study. If you have any questions regarding this letter, please contact Rob Ferrera, SMUD Environmental Specialist at (916) 732-6676.

Sincerely,



Rob Ferrera
Environmental Specialist
Environmental Management
Workforce and Enterprise Services
Sacramento Municipal Utility District

Cc: Rob Ferrera
Jose Bodipo-Memba
Pat Durham
Joseph Schofield

Woodlake Neighbors Creating Transparency
(WNCT)
P.O. Box 15564
Sacramento CA 95852

April 21, 2016

Transmitted via E-Mail

David Hung
dhung@cityofsacramento.org

RE Sacramento Senior Assisted Living and Memory Care (P15-041)

Dear David,

We reviewed the Mitigated Negative Declaration prepared for this project, and if the development proceeds forward to completion as described, Woodlake Neighbors Creating Transparency will support it.

In an earlier communication, we expressed concern about additional traffic the development might generate, and we continue to reserve the right to raise the issue with Columbia Pacific Advisors, LLC.

Because of the condition of the entire property, the Senior Assisted Living and Memory Care facility will represent an improvement in the appearance and landscaping of this portion of the property. We anticipate seeing hotel renovation and landscaping plans soon.

We hope to be invited to the groundbreaking for the project and look forward to the ribbon cutting of the completed Assisted Living and Memory Care facility.

Sincerely,



Jane Macaulay, President
rhmacaulay@aol.com

SACRAMENTO SENIOR LIVING [P15-041]
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
APPENDIX G – COMMENTS AND RESPONSES

Responses

Sacramento Regional County Sanitation District (Regional San) – March 28, 2016

The City recognizes that Regional San is not a land use authority and relies on regional planning documents, such as the General Plan, prepared by the City for growth projections. The letter from Regional San provides a description of their roles and responsibilities with regards to collection and treatment of wastewater. The letter also provides a description of their facilities for collecting and treating wastewater.

The City recognizes that Regional San establishes rates and fees for connection with sanitary sewer systems as outlined in the latest Regional San ordinances. The project applicant shall be responsible for bearing the sewer impact fees associated with the development of the project.

The City acknowledges that Regional San currently does not have facilities that could provide recycled water to the proposed project, nor is Regional San a water purveyor.

Sacramento Municipal Utilities District (SMUD) – April 21, 2016

Per the ISMND prepared for the proposed project, no significant impacts were noted in regards to overhead and/or underground transmission and distribution line easements; utility line routing; electrical load needs/requirements; energy efficiency; and/or climate change. It should be noted that both energy efficiency and climate change have been previously analyzed under the City's General Plan MEIR.

The City is not aware of anticipated project related impacts on existing or future SMUD facilities. As outlined in the ISMND, construction of the proposed project may result in increased use of electricity and natural gas to support the assisted living and memory care facility. The potential for increased demand in energy by the project was previously evaluated in the City's General Plan MEIR, with a less than significant impact identified. All cumulative impacts have been previously identified and analyzed in the City's General Plan MEIR. No mitigation is warranted or required.

Implementation of the proposed project is scheduled to start in Summer of 2016 and last approximately 6-12 months. The City will coordinate with SMUD to ensure that effective service may be provided throughout project development and operation.

The City endeavors to continue coordination with SMUD regarding the proposed energy delivery assumptions. General Plan policies associated with energy efficiency will be implemented by the proposed project. The ISMND presented these policies and impacts have been previously identified and addressed through the City's General Plan MEIR. The proposed project is consistent with the General Plan.

Infrastructure needs and energy delivery were discussed in the ISMND. As outlined in the ISMND, structures built as part of the project would be subject to Titles 20 and 24 of the California Code of Regulations, which serve to reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. The City's General Plan includes Policies Utilities 6.1.9, 6.1.10-12, and 6.1.14 to encourage the use of

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energy-efficient technology by offering rebates and other incentives to commercial and residential developers, and recruiting businesses that research and promote energy conservation and efficiency.

Policies 6.1.6 through 6.1.8 focus on promoting the use of renewable resources, which would reduce the cumulative impacts associated with use of non-renewable energy sources. In addition, Policies 6.1.10 and 6.1.13 call for the City to work closely with utility providers and industries to promote new energy conservation technologies.

The MEIR evaluated the potential impacts on energy from development occurring within the City and concluded that the effects would be less than significant (see Impact 4.11-6). The proposed project would result in no new impacts not previously identified and evaluated in the MEIR.

Woodlake Neighbors Creating Transparency – April 21, 2016

The letter describes earlier concern regarding traffic generation, but offers support based on completion of the development as described. The ISMND analyzed and presented the results of the project's potential impacts as related to transportation and circulation (see pages 65-70 of the ISMND). As outlined in the ISMND, all potential transportation and circulation impacts related to the proposed project are less than significant. The proposed project was accounted for in the City's General Plan MEIR and the project is consistent with the General Plan land use designation. The project will be conditioned to pay a fair share towards the future traffic signal at Leisure Lane, Canterbury Drive and Expo Parkway.