



January 31, 2014

Mr. Scott Johnson, Senior Planner  
City of Sacramento Community Development Department  
300 Richards Blvd., Third Floor  
Sacramento, CA 95811

Subject: Draft Environmental Impact Report for the Entertainment and Sports Complex

Dear Mr. Johnson,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Entertainment and Sports Complex (ESC). As the primary electrical service provider for the City of Sacramento and the proposed ESC project, SMUD aims to be a collaborative partner in the safe and sustainable delivery of this region-defining project. 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 would like to ensure that the proposed ESC project limits the potential for significant environmental effects within the vicinity of SMUD facilities, our employees, and customers.

As stated in our NOP comment letter, it is SMUD's desire that the ESC EIR acknowledge any project impacts related to SMUD facilities and operations. Based on our review of the Draft EIR and our understanding of the proposed project, SMUD offers the following input:

1. **Project Description:** SMUD appreciates the details provided in the Draft EIR related to the overall project description. The provision of an accurate and consistent project description allows SMUD to adequately plan the appropriate pre-construction support activities for the existing and future users of the proposed ESC site. The information about the project's construction impact footprint and the proposed design components, including references to "green walls/panels" and other proposed LEED strategies, is very important to SMUD and our customer service team. SMUD would like to be kept aware of any potential changes or clarifications to the project description, particularly as they impact SMUD facilities or service activities during construction and operation. In particular, the timing of construction activities that directly or indirectly impact existing SMUD facilities (vaults, transmission lines, distribution lines, etc.) could affect the timing of SMUD preconstruction activities, which could, in turn, impact the overall project schedule. SMUD currently has extensive subsurface utility infrastructure located throughout the project area and needs to maintain close coordination with the City and the project applicant to ensure

that the project goals and SMUD's service goals are both met. SMUD looks forward to continuing our partnership with the City in finding solutions to avoid or limit significant impacts to SMUD facilities and services.

- A. **Project Schedule:** SMUD appreciates the provision of the detailed demolition and construction schedule in the Draft EIR. Please keep SMUD apprised of any potential schedule changes, as they could impact the timing of SMUD's preconstruction activity with the existing service users onsite.
  - B. **Project Access:** SMUD would like to ensure that adequate access to on-site SMUD equipment is provided to our trucks and service vehicles during construction and operation.
  - C. **Energy Delivery (Capacity):** Please continue to coordinate with SMUD staff regarding the proposed energy delivery assumptions associated with the proposed project site. SMUD is looking forward to partnering with the City to ensure that the project is designed in an energy efficient and sustainable way.
  - D. **Energy Delivery (Infrastructure):** The EIR provides a solid analysis of the proposed on-site and off-site energy infrastructure improvements needed to construct and operate the proposed project. We are confident that the proposed EIR mitigation measures adequately address anticipates SMUD infrastructure work given the proposed project description. Please continue to coordinate with SMUD staff regarding potential changes in the delivery design. Additionally, the Mitigation Monitoring and Reporting Program should clearly delineate the responsibilities of SMUD and the City of Sacramento, as it pertains to infrastructure improvements.
2. **Biological Impacts:** SMUD would like to clarify that while we would be responsible for providing electricity to the project site and the digital billboards, the City and/or the applicant would be generally responsible for the implementation of any potential biological resource mitigation measures at these locations. In particular, all biological resource impacts related to the proposed ESC site and the off-site digital billboard implementation should be mitigated prior to SMUD activity. In turn, SMUD would ensure that any subsequent activities we perform comply with the approved Mitigation Monitoring and Reporting Program and any required permits. Additionally, please ensure that the final digital billboard locations are designed in a manner that allows for safe and clear access by SMUD vehicles.

3. **Cultural Resources:** SMUD appreciates the valuable information provided regarding the potential for cultural resource impacts within the project area. SMUD would like some clarification regarding the statement below.
    - A. Paragraph two on page 4.4-29 references the installation of subsurface electrical infrastructure by SMUD. Please note that any onsite subsurface excavation associated with SMUD infrastructure would occur during the project demolition and construction schedule and would therefore be covered by the impact analysis and mitigation measures provided in the ESC Draft EIR. SMUD will continue to coordinate with the City and the project applicant to avoid and minimize potential impacts to cultural resources.
4. **Noise:** SMUD appreciates the clarification that the Draft EIR noise analysis addresses all construction activity associated with the project including utility development. SMUD shall continue to coordinate with the City to ensure that SMUD related construction noise levels are reduced to the degree feasible.
5. **Utilities and Service Systems:** SMUD would like the record and the section to note that a formal letter was submitted to the City during the NOP review period. In addition SMUD would like to clarify that our site activities during the construction schedule are addressed in the ESC Draft EIR impact analysis. Additionally:
  - A. The last paragraph on page 4.11-49 and the first paragraph on page 4.11-50 erroneously state that the digital billboards will be supplied by SMUD. SMUD will supply energy to the billboards, but it is our assumption that either the City or the applicant will provide the actual billboard. Please clarify this in the final EIR.
  - B. The last paragraph on page 4.11-51 states that construction power would be provided via a combination of existing utility connections and portable generators. Please continue to coordinate with SMUD to ensure that if the project assumptions regarding construction power change, we are informed as soon as possible. Significant changes to the construction power plan could impact the project timing and implementation.

Please continue to keep SMUD apprised of the planning and development of the proposed ESC project. We see ourselves as partners with the City of Sacramento in the efficient and sustainable delivery of the proposed ESC project. 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 DEIR. If you have any questions regarding this letter,

please contact Jose Bodipo-Memba, SMUD Environmental Specialist at (916) 732-6493.  
Jose will be the primary environmental point of contact for SMUD on this project.

Sincerely,



Rob Ferrera  
Environmental Specialist  
Environmental Management  
Legislative & Regulatory Affairs  
Sacramento Municipal Utility District

Cc: Jose Bodipo-Memba  
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