

Sacramento Municipal Utility District Operations, Maintenance, and New Construction Habitat Conservation Plan EIR

Final Environmental Impact Report
May 2022
State Clearinghouse No. 2018092030

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Sacramento Municipal Utility District

Operations, Maintenance, and New Construction Habitat Conservation Plan EIR

Final Environmental Impact Report

State Clearinghouse No. 2018092030

May 2022

Lead Agency:

Sacramento Municipal Utility District
6201 S Street, MS H201
Sacramento, CA 95817-1899

or

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(916) 732-5063 or kim.crawford@smud.org

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Table of Contents

	Page
Table of Contents	i
List of Tables	ii
List of Abbreviated Terms	iii
1 Introduction	1-1
1.1 Public Review and Response to Comments	1-1
1.2 Organization of the Responses to Comments	1-2
1.3 Comments that Require Responses	1-2
1.4 Project Decision Process	1-3
1.5 Revisions to the Draft EIR	1-3
2 Comments and Responses to Comments	2-1
2.1 Commenters on the Draft EIR	2-1
2.2 Comments and Responses on the Draft EIR	2-1
3 Mitigation Monitoring and Reporting Program	3-1
3.1 Mitigation Implementation and Monitoring	3-1
3.2 Mitigation Enforcement	3-2
3.3 Reporting	3-2
3.5 Mitigation Monitoring and Reporting Program Table	3-2
4 List of Preparers	4-1
4.1 SMUD	4-1
4.2 ICF	4-1
4.3 Ascent Environmental, Inc.	4-1



List of Tables

Page

2-1	List of Commenters on the Draft EIR	2-1
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List of Abbreviated Terms

Draft EIR	draft environmental impact report
Final EIR	final environmental impact report
MMRP	mitigation monitoring and reporting program
NOP	Notice of Preparation
Proposed HCP	SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan
SMUD	Sacramento Municipal Utility District
the Board	SMUD Board of Directors
VELB	Valley Elderberry Longhorn Beetle

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1 Introduction

On January 31, 2022, the Sacramento Municipal Utility District (SMUD) released for public review the draft environmental impact report (Draft EIR) for the proposed SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan (proposed HCP). The EIR evaluates the impacts associated with implementation of the proposed HCP subject to state and federal endangered species take authorizations, and the impacts of the application for, issuance, and implementation of those authorizations.

1.1 Public Review and Response to Comments

Public participation is an essential part of the CEQA process. In accordance with 14 CCR Section 15082, a lead agency must provide notice that it will prepare an EIR and provide adequate opportunity for interested parties to provide comments on the scope of the EIR. Such comments are considered by the lead agency.

The public scoping process, which also establishes the environmental baseline, began September 13, 2018, with submittal of the Notice of Preparation (NOP) to the State Clearinghouse. The NOP notified the public and agencies of the SMUD HCP, the intent to prepare an EIR, and two public meetings that were held on September 27, 2018. The NOP also informed the public that written comments on the NOP should be received by October 15, 2018.

There were no significant issues identified in the scoping comments received. The NOP and scoping comments are included in Appendix A. The HCP is in Appendix B.

A Notice of Completion form and the Draft EIR were submitted to the State Clearinghouse on January 31, 2022. A notice of the availability of the Draft EIR and of the public meeting was mailed to agencies, organizations, and individuals that expressed interest during the scoping meetings described above.

The Draft EIR was available for public review starting January 31, 2022 and ending March 17, 2022. A virtual public meeting was held during the 45-day comment period on February 22, 2022. SMUD staff and SMUD's environmental consultant were available to present the project, receive comments, and answer questions. There was one attendee from the public at the public meeting but they did not submit any comments. During the 45-day public review process, interested parties (agencies, other stakeholders, and the general public) submitted a total of four e-mail comments (Table 2-1). The e-mails and SMUD's responses are provided in Chapter 2, *Comments and Responses to Comments*.

Responses to each of the comments received are provided in this document as part of the final environmental impact report (Final EIR). None of the comments require changes to the text of the Draft EIR. Therefore, there are no changes that constitute "significant new information," which would require recirculation of the Draft EIR. Significant new information is defined in Section 15088.5(a) of the State CEQA Guidelines as follows:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances have arisen from comments on the Draft EIR; therefore, recirculation is not required.

The Draft EIR, Final EIR, and associated appendices are available for review online at: <https://www.smud.org/CEQA>.

As required by State CEQA Guidelines Section 15088(b), SMUD has provided a printed or electronic copy (through the SMUD's website; see prior discussion) to each public agency that submitted written comments on the Draft EIR with written responses to that public agency's comments at least 10 days prior to consideration of the Final EIR for certification.

1.2 Organization of the Responses to Comments

Chapter 2 of the Final EIR consists of the written comments received on the Draft EIR, and presents responses to environmental issues raised in the comments (as required by State CEQA Guidelines Section 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as required by Section 15088(c) of the State CEQA Guidelines. Each comment letter has been reproduced and numbered. Responses to the comments follow each letter.

1.3 Comments that Require Responses

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required on comments regarding the merits of the project or on issues not related to the project's environmental impacts. Comments on the merits of the proposed project or other comments that do not raise environmental issues will be reviewed by SMUD's Board of Directors (the Board) before an action is taken on the project. The responses address environmental issues and indicate where issues raised are not environmental or address the merits of the projects. In the latter instance, no further response is provided.

1.4 Project Decision Process

This document and the Draft EIR together constitute the Final EIR, which will be considered by the Board before a decision on whether to approve the project. If the Board decides to approve the Project, it must first certify that the Final EIR was completed in compliance with CEQA's requirements, was reviewed and considered by the Board, and reflects the Board's independent judgment and analysis, as required by State CEQA Guidelines Section 15090. The Board would then be required to adopt findings of fact on the disposition of each significant environmental impact, as required by State CEQA Guidelines Section 15091. A Mitigation Monitoring and Reporting Program, which is required by CEQA Guidelines Section 15091(d), has been included as part of Chapter 3 of this Final EIR.

1.5 Revisions to the Draft EIR

CEQA Guidelines Section 15132 provides that a Final EIR must include, among other things, the Draft EIR or a revision of the draft. For this Final EIR, changes to the Draft EIR are shown with underline for additions and strikethrough for deletions.

The following text was added to Chapter 2, *Project Description* on page 2-8 of the Draft EIR and to the HCP (Appendix B of the Draft EIR) in Section 5.4.5.2, *Purchase Credits at Other Conservation Banks*:

Additional conservation/mitigation banks may be established in the future outside of the Plan Area that provide mitigation credits for VELB. If SMUD wishes to purchase credits at a newly-established conservation/mitigation bank, SMUD will review the conservation/mitigation bank documents to ensure that the bank satisfies the requirements of the SMUD HCP conservation strategy and permit. If SMUD believes the conservation/mitigation bank is appropriate, they will propose to purchase mitigation credits from that new conservation/mitigation bank to the Service to satisfy mitigation requirements of the HCP. The Service will review SMUD's proposal and approve if the conservation/mitigation bank satisfies the mitigation requirements of the HCP.



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2 Comments and Responses to Comments

This chapter contains the comment letters received during the public review period for the Draft EIR, which concluded on March 17, 2022. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments received from reviewers of the Draft EIR.

2.1 Commenters on the Draft EIR

Table 2-1 below indicates the numerical designation for the comment letters received, the author of the comment letter, and the date of the comment letter. Comment letters have been numbered in the order they were received by SMUD.

Table 2-1. List of Commenters on the Draft EIR

Comment Letter #	Commenter	Date Comment Received
1	United Auburn Indian Community, Anna Starkey	1/31/2022
2	San Joaquin Council of Governments, Steven Mayo	2/3/2022
3	County of Sacramento, Julie Newton	2/9/2022
4	Sacramento Metropolitan Air Quality Management District, Karen Huss	3/1/2022

2.2 Comments and Responses on the Draft EIR

The written comments received on the Draft EIR and the responses to those comments are provided in this section of the Final EIR. The comment letters received are reproduced in their entirety and followed by the response(s) to the letter.

All comments and provided herein are included within the record for consideration by the SMUD Board of Directors (the Board) as part of the SMUD HCP Project.

**Letter 1. Anna Starkey, United Auburn Indian Community, dated January 31,
2022**

From: [Anna Starkey](#)
To: [Kim Crawford](#)
Subject: [EXTERNAL] RE: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR
Date: Monday, January 31, 2022 10:28:21 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of SMUD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Congrats for getting this EIR out!

I do not have any comments other than really appreciate all the time and effort that was made to ensure tribal cultural resources were properly addressed and tribes were satisfied with the end results, including the language used in the TCR chapter. Great job!

Kindly,
Anna



From: Kim Crawford <Kim.Crawford@smud.org>
Sent: Monday, January 31, 2022 10:13 AM
To: Kim Crawford <Kim.Crawford@smud.org>
Subject: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR

Good Morning,

Attached is the Notice of Availability for the Sacramento Municipal Utility District Operations, Maintenance, and New Construction Habitat Conservation Plan EIR.

Written comments should be submitted to Kim Crawford, SMUD, 6201 S Street, MS B209, Sacramento, CA, 95817-1889 or at Kim.Crawford@smud.org before 5 p.m., March 17, 2022. A virtual public meeting will be held on February 22nd, see the attached Notice for Availability for more information. If you have questions, please contact me via email or at 916-732-5063.

Thank you,
Kim Crawford



Environmental Specialist
Environmental Services Department

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Sacramento Municipal Utility District
w.916-732-5063
kim.crawford@smud.org

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Nothing in this e-mail is intended to constitute an electronic signature for purposes of the Electronic Signatures in Global and National Commerce Act (E-Sign Act), 15, U.S.C. §§ 7001 to 7006 or the Uniform Electronic Transactions Act of any state or the federal government unless a specific statement to the contrary is included in this e-mail.



Response to Comment Letter 1 – Anna Starkey, United Auburn Indian Community

The United Auburn Indian Community has no comment on the Draft EIR; although, offered their appreciation for the results of the Tribal Cultural Resources chapter. No changes to the Draft EIR are necessary.

Letter 2. Steven Mayo, San Joaquin Council of Governments, dated February 3, 2022

From: [Steve Mayo](#)
To: [Kim Crawford](#)
Subject: [EXTERNAL] RE: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR
Date: Thursday, February 3, 2022 8:18:35 AM

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Kim,

Thank you for the Notice of Availability for the SMUD O&M and New Construction HCP. We will be providing any comments to you by the deadline.

Our agency, as administrators of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), would like to request more information/details on the draft.

1. Mapping of the overlap area within SJ County (300 +/- acres) depicting the following:
 - a. Area of overlap in a polygon
 - b. Landscape vegetation type
 - c. Past, current or future projects
2. Conservation Planning for impacts within SJ County

Respectfully,

Steven Mayo
Program Manager
Habitat Conservation Plan
San Joaquin Council of Governments
555 East Weber Avenue
Stockton, CA 95202
209-235-0600 phone
209-235-0438 fax
www.sjcog.org

Please note: During the pandemic, our staff will be limited in the office for responding to messages/calls and meetings. Thank you for understanding.



From: Kim Crawford <Kim.Crawford@smud.org>
Sent: Monday, January 31, 2022 10:13 AM
To: Kim Crawford <Kim.Crawford@smud.org>
Subject: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat

Conservation Plan EIR

External Email:

Good Morning,

Attached is the Notice of Availability for the Sacramento Municipal Utility District Operations, Maintenance, and New Construction Habitat Conservation Plan EIR.

Written comments should be submitted to Kim Crawford, SMUD, 6201 S Street, MS B209, Sacramento, CA, 95817-1889 or at Kim.Crawford@smud.org before 5 p.m., March 17, 2022. A virtual public meeting will be held on February 22nd, see the attached Notice for Availability for more information. If you have questions, please contact me via email or at 916-732-5063.

Thank you,
Kim Crawford
Environmental Specialist
Environmental Services Department

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kim.crawford@smud.org

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Response to Comment Letter 2 – Steven Mayo, San Joaquin Council of Governments

This comment is not directed at the environmental analysis included in the Draft EIR. Rather, it consists of a request for more information. Kim Crawford (SMUD) spoke with Steven Mayo on February 8, 2022, to provide more information and details on the proposed HCP. Below is a summary of the information discussed:

- the proposed HCP overlaps with San Joaquin County where SMUD has distribution electrical facilities. SMUD's electrical facilities are limited to approximately 3 miles of overhead distribution lines and 41 poles.
- land cover types within the Permit Area are described in Section 3.3 of the proposed HCP.
- SMUD's Covered Activities consist of O&M and construction activities within Permit Area as described in Section 2 (Covered Activities) of the proposed HCP.
- The Conservation Strategy consists of avoidance, minimization and mitigation as described in Section 3 (Conservation Strategy) of the proposed HCP. The Plan Area, where HCP mitigation would occur, did not include San Joaquin County.

No changes to the Draft EIR are necessary.

Letter 3. Julie Newton, County of Sacramento, dated January 5, 2021

From: [Newton, Julie](#)
To: [Kim Crawford](#)
Subject: [EXTERNAL] FW: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR
Date: Wednesday, February 9, 2022 1:57:59 PM
Attachments: [SMUD HCP EIR NOA.pdf](#)

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Good afternoon Kim,

I am one of the Sacramento County staff members that implements the South Sacramento Habitat Conservation Plan. We are hoping to get a better understanding of how the SMUD plan works implementation-wise, and have a few questions. We figured it would be easier to just talk through it if you have an hour in which you are available.

Below are some times that we are available, would one of these work for you?

Tuesday 2/22 – 10-11 am

Thursday 2/24 – 9 am – 1pm

Friday 2/25 – after 10 am

Thanks
-Julie

Julie Newton, Senior Planner

Planning and Environmental Review
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 876-8502
www.per.saccounty.net



Planning & Environmental Review (PER) is open by appointment only. Please see our website at www.planning.saccounty.net for the most current information on how to obtain services and to schedule an appointment.

From: Kim Crawford <Kim.Crawford@smud.org>
Sent: Monday, January 31, 2022 10:13 AM
To: Kim Crawford <Kim.Crawford@smud.org>
Subject: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.



Good Morning,

Attached is the Notice of Availability for the Sacramento Municipal Utility District Operations, Maintenance, and New Construction Habitat Conservation Plan EIR.

Written comments should be submitted to Kim Crawford, SMUD, 6201 S Street, MS B209, Sacramento, CA, 95817-1889 or at Kim.Crawford@smud.org before 5 p.m., March 17, 2022. A virtual public meeting will be held on February 22nd, see the attached Notice for Availability for more information. If you have questions, please contact me via email or at 916-732-5063.

Thank you,
Kim Crawford
Environmental Specialist
Environmental Services Department

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kim.crawford@smud.org

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Response to Comment Letter 3 – Julie Newton, County of Sacramento

In this comment, the commenter requests more information regarding the implementation of the HCP and the comment is not directed at the environmental analysis.

On February 22, 2022, SMUD Environmental Services staff and Sacramento County staff that implements the South Sacramento HCP, discussed implementation of the South Sacramento HCP and SMUD's proposed HCP. Items discussed included SMUD's HCP Covered Activities and Conservation Strategy and potential coordination implementation and mitigation efforts between the two HCPs. There were no comments on the Draft EIR and therefore, no changes are necessary.

**Letter 4. Karen Huss, Sacramento Metropolitan Air Quality Management District,
dated March 1, 2022**

From: [Karen Huss](#)
To: [Kim Crawford](#)
Cc: [Paul Philley](#)
Subject: [EXTERNAL] RE: Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR
Date: Tuesday, March 1, 2022 11:42:19 AM
Attachments: [image001.png](#)
[image002.png](#)

CAUTION: This email originated from outside of SMUD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kim,
The Sac Metro Air District does not have comments on SMUD's HCP EIR.
Thank you for sending it over for review.

Karen Huss
Associate Air Quality Planner/Analyst
Transportation & Climate Change Division - CEQA & Land Use
Desk: (279) 207-1131
Website: www.AirQuality.org
Send project review inquiries to projectreview@airquality.org



From: Kim Crawford <Kim.Crawford@smud.org>
Sent: Monday, January 31, 2022 10:13 AM
To: Kim Crawford <Kim.Crawford@smud.org>
Subject: DUE 3/17 Notice of Availability for SMUD Operations, Maintenance, and New Construction Habitat Conservation Plan EIR

***** THIS EMAIL ORIGINATED OUTSIDE
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Good Morning,

Attached is the Notice of Availability for the Sacramento Municipal Utility District Operations, Maintenance, and New Construction Habitat Conservation Plan EIR.

Written comments should be submitted to Kim Crawford, SMUD, 6201 S Street, MS B209, Sacramento, CA, 95817-1889 or at Kim.Crawford@smud.org before 5 p.m., March 17, 2022. A virtual public meeting will be held on February 22nd, see the attached Notice for Availability for more information. If you have questions,



please contact me via email or at 916-732-5063.

Thank you,
Kim Crawford
Environmental Specialist
Environmental Services Department

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***Response to Comment Letter 4 – Karen Huss, Sacramento Metropolitan Air
Quality Management District***

The Sacramento Metropolitan Air Quality Management District has no comment on the Draft EIR. No changes to the Draft EIR are necessary.



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3 Mitigation Monitoring and Reporting Program

This mitigation monitoring and reporting program (MMRP) summarizes the mitigation measures, implementation schedule, and responsible parties for monitoring the mitigation measures required for the proposed Project, as set forth in the EIR prepared for the Project.

Section 21081.6 of the California Public Resources Code and Section 15091(d) and Section 15097 of the State CEQA Guidelines require public agencies “to adopt a reporting or monitoring program for changes to the project which it has adopted or made conditions of project approval to mitigate or avoid significant effects on the environment.” A MMRP is required for the project because the EIR for the project identified potentially significant adverse impacts related to construction and operation of the proposed Project, and mitigation measures have been identified to reduce most of those impacts to a less-than-significant-level.

This MMRP will be adopted by SMUD if it approves the Project and will be kept on file at SMUD’s Customer Service Center at 6301 S Street, Sacramento, CA 95817; and at SMUD’s East Campus Operations Center at 4401 Bradshaw Road, Sacramento, CA 95827. SMUD will use this MMRP to ensure that identified mitigation measures, adopted as a condition of project approval, are implemented appropriately.

3.1 Mitigation Implementation and Monitoring

SMUD will be responsible for monitoring the implementation of mitigation measures designed to minimize impacts associated with the project. While SMUD has ultimate responsibility for ensuring implementation, others may be assigned the responsibility of actually implementing the mitigation. SMUD will retain the primary responsibility for ensuring that the project meets the requirements of this MMRP and other permit conditions imposed by participating regulatory agencies.

SMUD will designate specific personnel who will be responsible for monitoring implementation of the mitigation that will occur during project construction. The designated personnel will be responsible for submitting documentation and reports to SMUD on a schedule consistent with the mitigation measure and in a manner necessary for demonstrating compliance with mitigation requirements. SMUD will ensure that the designated personnel have authority to require implementation of mitigation requirements and will be capable of terminating project construction activities found to be inconsistent with mitigation objectives or project approval conditions.

SMUD and its appointed contractor will also be responsible for ensuring that its construction personnel understand their responsibilities for implementing the mitigation measures and adhering to the performance requirements of the mitigation plan. In addition to the prescribed mitigation measures, the MMRP table below lists each identified environmental resource being affected (in the same order and using the same numbering system as in the EIR), the associated CEQA checklist question (used as the

thresholds of significance in the EIR), the corresponding monitoring and reporting requirement, the party responsible for ensuring implementation of the mitigation measure and monitoring effort, and the project component to which the mitigation measure applies.

If an issue addressed in the EIR does not result in mitigation, it is not included in the table.

3.2 Mitigation Enforcement

SMUD will be responsible for enforcing mitigation measures. If alternative measures are identified that would be equally effective in mitigating the identified impacts, implementation of these alternative measures will not occur until agreed upon by SMUD.

3.3 Reporting

SMUD shall prepare a monitoring report upon completion of the project describing the compliance of the activity with the required mitigation measures. Information regarding inspections and other requirements shall be compiled and explained in the report. The report shall be designed to simply and clearly identify whether mitigation measures have been adequately implemented. At a minimum, each report shall identify the mitigation measures or conditions to be monitored for implementation, whether compliance with the mitigation measures or conditions has occurred, the procedures used to assess compliance, and whether further action is required. The report shall be presented to SMUD's Board of Directors.

3.4 Mitigation Monitoring and Reporting Program Table

The categories identified in the attached MMRP table are described below.

Environmental Resource Topic – This column identifies which CEQA issue area the mitigation measure is attributed to in the EIR.

Impact – This column provides the impact number and statement included in the EIR.

Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure.

Implementation Duration – This column identifies when the mitigation measure shall be implemented (e.g., prior to construction, during construction, prior to occupancy, etc.).

Monitoring Duration – This column identifies the period within which monitoring shall be conducted.

Responsibility – This column identifies the party(ies) responsible for implementation and/or enforcing compliance with the requirements of the mitigation measure.

Environmental Resource Topic	Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
3.5 Cultural Resources	Impact 3.5-2: Have a substantial adverse change in the significance of a unique archaeological resource.	<p>Mitigation Measure CUL-1: Avoidance and Archaeological Monitoring</p> <p>The northern portion of the SMUD Bank holds the most potential for uncovering early Native American cultural resources. If possible, soil disturbance in this area should be avoided. If avoidance is not possible, a qualified archaeologist must be present during any ground disturbance or excavation. This area includes that portion of the SMUD Bank north of latitude 38° 20' 37.00" N or UTM 424560N (Zone 10). This east-west line would occur approximately just north of the reservoir that exists roughly 1,000 feet northwest of the lake and approximately 2,000 feet southeast of the ranch buildings adjacent to the northwest portion of the SMUD Bank.</p>	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	SMUD; contractor	SMUD

Environmental Resource Topic	Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
3.5 Cultural Resources	Impact 3.5-2: Have a substantial adverse change in the significance of a unique archaeological resource.	Mitigation Measure CUL-2: Environmental Awareness Training Prior to working onsite, individuals who are involved in soil moving and handling must attend environmental awareness training provided by a qualified professional archaeologist. This training would provide information on the types and extent of cultural resources that may be located onsite. Individuals conducting any excavation or other substantial subsurface disturbance activities onsite shall also attend the environmental awareness training.	Prior to and during implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	SMUD; qualified archaeologist	SMUD
3.5 Cultural Resources	Impact 3.5-2: Have a substantial adverse change in the significance of a unique archaeological resource.	Mitigation Measure CUL-3: Stop Work if Archaeological Resources are Encountered Should any evidence of early Native American or historic cultural resources be discovered during excavation or other substantial	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	SMUD; qualified archaeologist; contractor	SMUD

Environmental Resource Topic	Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		subsurface disturbance activities, all work should immediately cease, and a qualified archaeologist must be consulted to assess the significance of the cultural materials.				
3.5 Cultural Resources	Impact 3.5-3: Disturbance of any human remains including those interred outside of formal cemeteries.	<p>Mitigation Measure CUL-4: Stop Work if Human Remains Are Discovered during Ground Disturbing Activities</p> <p>If human remains are discovered during excavation or other substantial subsurface disturbance activities, all work must immediately cease and the local coroner must be contacted. Should the remains prove to be of cultural significance, the NAHC in Sacramento, California, must be contacted with additional notification going to the most likely descendants.</p>	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	SMUD; Coroner; contractor	SMUD

Environmental Resource Topic	Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
3.18 Tribal Cultural Resources	Impact 3.18-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource that is Listed or Eligible for Listing in the California Register of Historical Resources or Other Local Register.	<p>Mitigation Measure TCR-1: Discovery of Unanticipated Tribal Cultural Resources</p> <p>If any suspected TCRs are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from a California Native American tribe that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary.</p> <p>When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA and Tribal protocols, and</p>	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank	During implementation of Direct Actions including Enhance Sacramento Orcutt Grass Population and Slender Orcutt Grass Introduction at SMUD Bank and afterwards to ensure appropriate treatment is carried out	SMUD; contractor; culturally-affiliated Tribe	SMUD; contractor; culturally-affiliated Tribe

Environmental Resource Topic	Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<p>every effort shall be made to preserve the resources in place, including through project redesign, if feasible.</p> <p>Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by the consulting Tribe that is traditionally and culturally affiliated with the project area.</p> <p>The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the</p>				

Environmental Resource Topic	Impact	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<p>resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil.</p> <p>Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB52, have been satisfied.</p>				

4 List of Preparers

4.1 SMUD

Kim Crawford – Environmental Specialist

Emily Bacchini – Manager, Environmental Services

4.2 ICF

Sally Lyn Zeff, AICP – Project Manager, Project Description, Environmental Approach

Tina Sorvari – Project Coordinator, Hazards and Hazardous Materials

Margaret Lambright – Project Coordinator, Introduction, Environmental Setting, Impacts, and Mitigation Measures

Angela Alcala – Senior Biologist (Wildlife), Biological Resources

Jordan Mayor – Senior Biologist (Botany), Biological Resources

Stephen Pappas – Cultural Resources and Tribal Cultural Resources

David Lemon – Cultural Resources

Devan Atteberry – Energy, Wildfire

Patrick Maley – Geology, Soils, and Minerals

Diana Roberts – Paleontological Resources

Caroline Vurlumis – Hydrology and Water Quality

Brendan Belby – Hydrology and Water Quality Peer Review

Daniel Schiff – GIS Specialist

Christine McCrory – Technical Editor

Jesse Cherry – Document Production

4.3 Ascent Environmental, Inc.

Heather Blair – Project Manager, Project Description, Environmental Approach

Gary Jakobs – Principal in Charge, Environmental Approach

Stephanie Rasmussen – Aesthetics, Project Description

Erin Kraft – Agricultural and Forest Resources, Land Use and Planning, Utilities

Kristi Black – Air Quality, Greenhouse Gas Emissions, Population and Housing, Public Services

Dimitri Antoniou – Noise

Ally Kerley – Recreation

Zachary Miller – Transportation



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