



SACRAMENTO CITY UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION

Agenda Item 10.1e

Meeting Date: February 21, 2019

Subject: Approve Resolution No. 3052 Nutrition Services - Central Kitchen Project Mitigated Negative Declaration (MND)

- Information Item Only
- Approval on Consent Agenda
- Conference (for discussion only)
- Conference/First Reading (Action Anticipated: _____)
- Conference/Action
- Action
- Public Hearing

Division: Facilities Support Services

Recommendation: Receive for review the Mitigated Negative Declaration (MND), including the public comments received, and the Mitigation Reporting Program (MRP) for the Central Kitchen Project. The California Environmental Quality Act (CEQA) requires the adoption of such a resolution for the planning and construction of the Central Kitchen Project. Resolution No. 3052 is attached.

Background/Rationale: The Central Kitchen Project consists of an approximately 44,892 square feet building that will house the District's Nutrition Services and a centralized kitchen facility.

The proposed project is subject to review under CEQA. For every non-exempt public project, CEQA generally requires the Lead Agency to prepare an Initial Study in order to determine the level of environmental review that is required for CEQA compliance. If the Initial Study indicates that the project will not result in significant environmental impacts, the Lead Agency may adopt a "negative declaration" rather than preparing a full Environmental Impact Report. (Pub Res. Code Section 21080 (c).)

If the Initial Study reveals substantial evidence that significant environmental impacts might occur, but also identifies mitigation measures that reduce those impacts to a level of less than significant, the lead agency may satisfy CEQA obligations with a "Mitigated Negative Declaration." (Pub. Res. Code Section 21064.5 & Section 21080 (d).)

In consistency with this process, an Initial Study was prepared which determined that the proposed project may result in significant environmental impacts, but that the mitigation measures would reduce those impacts to a level of less than significant.

Therefore, a Mitigated Negative Declaration (MND) was prepared. In compliance with CEQA Guidelines 15072 & 15073, the District provided notice of and circulated the MND for public review. The Notice of Availability was published in the Sacramento Bee and mailed to residents immediately adjacent to the new location at 3101 Redding Ave.

The District received three (3) comments from members of the public which are included in the Summary of Comments for the Board's review. None of the Comments affect the adequacy of the MND for the purposes of CEQA compliance. The MND including the Appendices and Mitigation Reporting Program (MRP), represents the proposed final environmental document for the Project. Approval for the MND, along with the MRP will satisfy the District's obligation under CEQA and is a prerequisite to final District approval of the Project.

Financial Considerations: None

LCAP Goal(s): Operational Excellence

Documents Attached:

1. Resolution No. 3052
2. Mitigated Negative Declaration for the Central Kitchen Project and Technical Appendix for MND Link:
<https://www.scusd.edu/read-draft-mitigated-negative-declaration-central-kitchen-project>
3. Mitigation Reporting Program
4. Responses to Comments

Estimated Time of Presentation: N/A

Submitted by: Cathy Allen, Chief Operations Officer

Approved by: Jorge A. Aguilar, Superintendent

**SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
BOARD OF EDUCATION RESOLUTION NO. 3052**

**RESOLUTION OF THE SACRAMENTO CITY UNIFIED SCHOOL DISTRICT ADOPTING
THE MITIGATED NEGATIVE DECLARATION AND APPROVING THE MITIGATION
REPORTING PROGRAM FOR THE CENTRAL KITCHEN PROJECT**

WHEREAS, the Board of Education (“Board”) of the Sacramento City Unified School District (the “District”) has received a Mitigated Negative Declaration/Initial Study (“MND”) dated January 2, 2019, prepared for the Central Kitchen Project (“Project”); and

WHEREAS, the Project consists of constructing an approximately 44,892 square feet building to house the District’s Nutrition Services at 3101 Redding Avenue,

WHEREAS, on January 1, 2019, the District published the Notice of Availability and Intent to Adopt the MND in the Sacramento Bee; and

WHEREAS, on January 2, 2019, the District posted the Notice of Availability and Intent to Adopt the MND and the MND in its entirety on the District’s website

WHEREAS, on January 2, 2019, the District also filed a Notice of Completion with the State Clearinghouse allowing the State to circulate copies of the MND to any affected State agencies for comment; and

WHEREAS, the public comment period on the MND commenced on January 2, 2019, and ended on February 1, 2019, following said notice to the public and all public agencies; and

WHEREAS, the District received three (3) written comments on the MND from the public and reviewing public agencies during the public review period; and

WHEREAS, such comments and responses thereto have been incorporated into the MND through a Summary of Comments; and

WHEREAS, all actions required to be taken by applicable law relating to the preparation, circulation, and review of the MND have been taken; and

WHEREAS, the Board has reviewed and considered the MND (including the Appendices, the Summary of Comments and Responses) and has evaluated and considered the comments received from persons who have reviewed the MND and any written responses thereto;

WHEREAS, the Board has reviewed and considered the mitigation measures identified in the MND and listed in the Mitigation Reporting Program (“MRP”) set forth in Exhibit A; and

WHEREAS, the facts and findings regarding the Project set forth in this Resolution are supported by substantial evidence in the administrative record and by the MND; and

WHEREAS, the MND has identified all significant environmental effects of the Project and all significant and known potentially significant impacts; and

WHEREAS, the MND has described reasonable mitigation measures that will reduce potentially significant impacts to less than significant; and

WHEREAS, the MND reflects the Board's independent judgment and analysis on the potential for environmental impacts from the Project

NOW, THEREFORE, BE IT RESOLVED by the Sacramento City Unified School District Board of Education at the meeting held on February 21, 2019 the following:

SECTION 1: The foregoing recitals are true and correct and made part of this Resolution. SECTION 2: For every non-exempt public project, the California Environmental Quality Act ("CEQA") generally requires the lead agency to prepare an initial study in order to determine the level of environmental review required for CEQA compliance. If the initial study indicates that the project will not result in significant adverse environmental impacts, the lead agency may adopt a "negative declaration." (Pub. Res. Code § 21080(c)). If the initial study reveals substantial evidence that significant environmental impacts might occur, but also identifies mitigation measures that reduce those impacts to a level of less than significant, the lead agency may satisfy CEQA obligations with a "Mitigated Negative Declaration." (Pub. Res. Code §§ 21064.5 & 21080(d))

SECTION 3: As set forth in the Recitals, in compliance with CEQA, the District prepared the MND and circulated it for public review.

SECTION 4: The Board hereby certifies that all comments received in response to the MND and responses thereto have been considered by the Board, which comments and responses are included in the Summary of Public Comment. Further, for the purposes of CEQA and the findings set forth herein, the record of proceedings for the District decision on the Project includes, but is not limited to all information in the administrative record including but not limited to the MND, all public notices related to the Project; all comments submitted by any agencies and members of the public; all reports, studies memoranda (excluding confidential memoranda) and other documents relevant to the Project prepared by the District; the District's consultants, or responsible or trustee agencies with respect to the District compliance with the requirements of CEQA and with respect to the District's action on the Project; any documentary or other evidence submitted to the District at public meetings or hearings related to the Project; and matters of common knowledge to the District. The materials in the record are located at and available upon request at the District office.

SECTION 5: The MND for the Project has been completed and is in compliance with the provisions of CEQA, with State and local Guidelines implementing CEQA, and all other applicable laws and regulations.

SECTION 6: In accordance with CEQA, the Board determines that the findings made in the MND with respect to the potential environmental impacts of the Project and the proposed mitigation measures are complete and accurate and hereby incorporates such findings of the MND by reference.

SECTION 7: The Board finds and declares that the MND for the Project was presented to the Board and the Board independently reviewed and considered the information contained in the MND prior to approving the Project, as the Project is defined in the MND.

SECTION 8: Based on its review of the MND, the Board finds that the MND for the Project is an adequate assessment of the potentially significant environmental impacts of the Project, as described in the MND.

SECTION 9: The Board has reviewed the findings of the Project, comments regarding the Project, and other relevant Project records. Based on the evidence contained therein, the Board finds and determines that, following implementation of the mitigation measures set forth in the MND, there is no substantial evidence of a significant, unmitigated environmental impact caused by the Project.

SECTION 10: The Board hereby adopts the Mitigated Negative Declaration as complete and adequate under CEQA, and certifies that the MND represents the independent judgment of the Board.

SECTION 11: The MRP has been prepared to meet the requirements of Public Resources Code Section 21081.6. This program is designed to ensure compliance with Project changes and mitigation measures imposed to avoid or substantially lessen the significant effects identified in the MND. The Board hereby adopts the Mitigation Reporting Program.

SECTION 12: The MND and the MRP are on file and available at the administrative office of the Sacramento City Unified School District. The custodian of the documents and records referred to herein shall be the Chief Operations Officer, Facility Support Services and shall be located at 5735 47th Avenue, Sacramento, CA.

PASSED AND ADOPTED by the Sacramento City Unified School District Board of Education on this date February 21, 2019, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Jessie Ryan
President of the Board of Education

ATTESTED TO:

Jorge A. Aguilar
Secretary of the Board of Education

EXHIBIT A

SACRAMENTO CITY UNIFIED SCHOOL DISTRICT Central Kitchen Project

Mitigation Reporting Program

In January 1989, Assembly Bill 3180 went into effect requiring the lead agency to monitor all mitigation measures applicable to this project and included in the Mitigated Negative Declaration (MND).

The Sacramento City Unified School District (District) is the lead agency for the CEQA review of the Central Kitchen Project. The District prepared a CEQA Initial Study for the project and determined that the proposed project could result in impacts, but these impacts would be reduced to a less-than-significant level with incorporation of the following mitigation measures.

Required Mitigation Measures

Mitigation Measure Air Quality 1: Dust Control. The School District shall require all construction contractors on the site to comply with Sacramento Metropolitan Air Quality Management District Rule 403 which requires the following construction period dust control practices:

- a. Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- b. Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- c. Use wet power vacuum street sweepers to remove any visible track out of mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- d. Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- e. All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- f. The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel-powered equipment. The

California Air Resources Board enforces the idling limitations. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

- g. The District shall ensure these measures are included in the construction specifications.
- h. Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Responsible Party: District Facilities Management and Construction Contractor(s) and Crews

Timing: Prior to start of construction, the District shall include these requirements in the contract specifications and/or review these requirements at the Pre-construction conference and any follow up meetings with the contractor.

RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE PUBLIC DRAFT MITIGATED NEGATIVE DECLARATION (MND) FOR THE DISTRICT CENTRAL KITCHEN PROJECT

On January 2, 2019, a Notice of Availability (NOA) for the Mitigated Negative Declaration (MND) for the Sacramento Unified School District's Central Kitchen Project was published by the Sacramento City Unified School District (SCUSD). The District published the NOA in the Sacramento Bee on January 1, 2019, a newspaper of general circulation serving the greater Sacramento area in which the project is located. In addition, the District sent a copy of the NOA to property owners adjacent to the proposed new Central Kitchen site. A full copy of the MND and Appendices was available for public review at the District's website at www.scusd.edu/facilities-services.

The MND and the NOA were also submitted to the State Clearinghouse for review in accordance with Section 15073 of the California Environmental Quality Act Guidelines. The 30-day public review period began January 2, 2019 to February 1, 2019. Two letters of comment were received by the District.

1. Letter from Jordan Hensley, Environmental Scientist, Central Valley Regional Water Quality Control Board (CVRWQCB), dated January 25, 2019 (Attachment 1).
2. Letter from Harold (Bud) Duke, State Department of Toxic Substances Control (DTSC) dated January 25, 2019 (Attachment 2).
1. Letter from Nicole Goi, Regional & Local Government Affairs, Sacramento Municipal Utility District (SMUD), dated January 29, 2019 (Attachment 2)

A summary of responses to each letter follows:

Letter 1 CVRWQCB: This letter summarizes the regulations which the CVRWQCB is responsible for implementing or enforcing. Section 1 of the letter summarizes the requirements of the Porter Cologne Water Quality Act which requires that a Basin Plan be prepared for the Central Valley Basin by the CVWQCB. This section also recites the State Water Board's Antidegradation Policy. Section IX Water Quality and Hydrology of the MND discusses the project's potential impacts on the water basin. The project will retain storm water on-site and the project does not result in any off-site discharges which would affect waters of the basin.

Section II of the letter discusses Permitting Requirements administered by CVWQCB. Among the activities which require a permit are Construction Period Storm Water discharges. For these types of discharges the National Pollution Discharge Prevention and Elimination Act (NPDES) requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP). The District has prepared a SWPPP for the project.

Section II also summarizes the requirements for Industrial Storm Water Permits which also requires the use of best management practices which are included in the SWPPP for the project.

Section II summarizes Sections 404 and 401 of the Clean Water Act. Page 38 of the MND determined that the project would not affect any jurisdictional waters of the United States which would require a 404 or 401 permit.

The project does not require de-watering, off-site discharges or propose any commercially irrigated agricultural activities and as such, these permits are not applicable to the project.

Letter 2 Department of Toxic Substances Control (DTSC): DTSC notes that the District should prepare a Preliminary Environmental Assessment (PEA) for any portion of the site which will serve as a school classroom. DTSC further states that the PEA should be coordinated with DTSC's school site office.

The District has contracted with Ahtna Facility Services, Inc. (AFSI) and Alan D. Gibbs Environmental Consultant (ADG) to complete a *Preliminary Environmental Assessment* (PEA) for the subject Central Kitchen site focusing on the portion of the site which may be used for culinary arts classes. The report is in draft format at this time, however, the testing results show that no further investigation is warranted on the portion of the site identified for classroom use. Prior to use of any portion of the site for classroom uses, the District will coordinate with DTSC as necessary to ensure that all requirements for classroom safety are met.

Letter 3: Sacramento Municipal Utility District (SMUD): SMUD provided a letter outlining the types of coordination required to ensure adequate service to the project. The District has contracted with HMC Architects to coordinate the design and engineering of the Central Kitchen project. The design team and District staff have been in close coordination with SMUD in the development of this project and the adjacent District Transportation Facility (currently under construction). For both projects, the District and the design team have ensured that all requirements of SMUD have been met. The District further suggests the MND should consider cumulative energy impacts and climate change. Climate change and cumulative energy impacts were reviewed in the MND on pages 27 and 49. In particular Greenhouse Gases (GHG) which are a major contributor to climate change were analyzed using the Sacramento Air Quality Management District's requirements and the CALEEM emissions model. GHG emissions are below SMAQMDs threshold of significance and are not cumulatively considerable. Relative to energy use, it is important to note that the new Central Kitchen facility will be far more energy efficient than cooking the same number of hot meals at the older, less energy efficient facilities located in the 87 individual school site kitchens through-out the District.

In accordance with Section 15074 of the California Environmental Quality Act Guidelines, the District has reviewed and considered these comments and determined that the above comments provide supplemental information, but do not change the conclusions of the Mitigated Negative Declaration regarding impacts or the significance of impacts or the effectiveness of the mitigation measures.



Central Valley Regional Water Quality Control Board

25 January 2019

Jim Dobson
Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824

CERTIFIED MAIL
7018 1830 0001 0062 3879

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, SACRAMENTO CITY SCHOOL DISTRICT CENTRAL KITCHEN PROJECT, SCH#2019012002, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 2 January 2019 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 Sacramento City School District Central Kitchen Project, 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 adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

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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/sacsjr_201805.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 Activities (Construction General Permit), Construction General Permit Order No. 2009-009-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 State Water Resources Control Board website at:

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

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.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

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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/

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 Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. 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 Risk 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 Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

- 1. Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/ or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
- 2. Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 11-100 acres are currently \$1,277 + \$8.53/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

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.

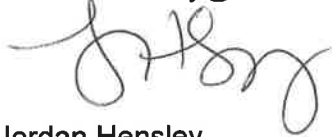
For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

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/>

If you have questions regarding these comments, please contact me at (916) 464-4812 or Jordan.Hensley@waterboards.ca.gov.



Jordan Hensley
Environmental Scientist

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



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

January 28, 2019

Mr. James C. Dobson
Director, Planning and Operations
Sacramento City Unified School District
Serna Center
5735 47th Avenue,
Sacramento, California 95824

DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE
SACRAMENTO CITY UNIFIED SCHOOL DISTRICT CENTRAL KITCHEN PROJECT,
3101 REDDING AVENUE AT SAN JOAQUIN STREET, SACRAMENTO,
SACRAMENTO COUNTY
(SCH #2019012002)

Dear Mr. Dobson:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has reviewed the draft Initial Study and Mitigated Negative Declaration (IS/MND) for the Sacramento City Unified School District Central Kitchen Project (Project) proposed by the Sacramento City Unified School District (District). The due date to submit comments is February 1, 2019.

As reported in the IS/MND, the proposed Project includes the construction of a 44,892 square foot (sq. ft.) Central Kitchen facility to prepare meals for the District-owned site. The Kitchen itself comprises 33,270 sq. ft. of the building. Other uses include 7,234 sq. ft. committed to office space for the Nutrition staff and a 1,640 sq. ft. training area. The project also includes reconfiguration of the existing parking areas and landscaping.

Based on a review of the draft IS/MND, DTSC would like to provide the following comment:

1. The Preliminary Environmental Assessment (PEA) investigation, and mitigation and/or removal if deemed necessary, should continue to be conducted under DTSC oversight. The IS requires an analysis of the potential public health and environmental impacts associated with the proposed response action, if necessary, pursuant to requirements of the California Environmental Quality Act (CEQA - Pub.

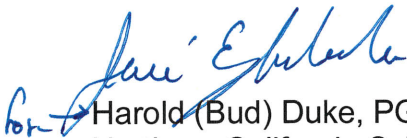
Mr. James C. Dobson
January 28, 2019
Page 2

Resources Code, Division 13, Section 21000 et seq.), and it's implementing Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), prior to approval or adoption of the IS/MND for the Project. A discussion of the results of the PEA investigation and DTSC's determination, and, if necessary, a discussion of the mitigation and/or removal actions and associated cumulative impacts to the Site and the surrounding environment should be included in the IS/MND. If sufficient information to discuss the results of the PEA investigation and proposed mitigation and/or removal actions, if necessary, and their associated impacts to the Site and the surrounding environment are not available for inclusion in the IS/MND, then an Addendum may be required.

DTSC is also administering the Revolving Loan Fund (RLF) Program, which provides revolving loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSC's Schools process or RLF Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (916) 255-3695, or via email at bud.duke@dtsc.ca.gov.

Sincerely,



Harold (Bud) Duke, PG
Northern California Schools Unit
Site Mitigation and Restoration Program

cc: (via email)

State Clearinghouse (State.clearinghouse@opr.ca.gov)
Office of Planning and Research

Mr. Fred Yeager (FYeager@cde.ca.gov)
Department of Education – Sacramento, CA

Mr. Bryan D. Boyd, EdD (BBoyd@cde.ca.gov)
Department of Education – Sacramento, CA

Mr. Jose Salcedo, PE, Chief (Jose.Salcedo@dtsc.ca.gov)
DTSC Schools Unit – Sacramento, CA



Sent Via E-Mail

January 29, 2019

Jim Dobson
Sacramento City Unified School District
5735 47th Ave.
Sacramento, CA 95824
jimd@scusd.edu

Subject: Sacramento City School District Central Kitchen / MND / 2019012002

Dear Mr. Dobson,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Mitigated Negative Declaration (MND) for the Sacramento City School District Central Kitchen (Project, SCH 2019012002). 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 Project MND 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-Solutions-and-Rebates/Design-and-Construction-Services>
 - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:

Existing Facilities

- Existing 69kv and 12kV overhead route will remain.
- Existing 12kV overhead lines on the north and south of the project site will remain.

Proposed Facilities

- Proposed underground facilities on south and west of the project site.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. 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 this MND. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera, at rob.ferrera@smud.org or 916.732.6676.

Sincerely,



Nicole Goi
Regional & Local Government Affairs
Sacramento Municipal Utility District
6301 S Street, Mail Stop A313
Sacramento, CA 95817
nicole.goi@smud.org

Cc: Rob Ferrera