
From: Rob Ferrera <Rob.Ferrera@smud.org>
Sent: Wednesday, July 30, 2014 10:38 AM
To: BDCP.comments@noaa.gov
Cc: Joe Schofield; Emily Bacchini
Subject: BDCP EIR EIS SMUD Comment Letter
Attachments: BDCP EIR EIS SMUD Comment letter.pdf

Mr. Wulff,

Please find SMUD's comments on the BDCB in the attached document. Apologies for the tardy submission.

Regards,

Rob

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July 29, 2014
EM 2014-022

Mr. Ryan Wulff
BDCP Comments
National Marine Fisheries Service
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

Re: Draft Environmental Impact Statement and Environmental Impact Report for the Bay Delta Conservation Plan

Dear Mr. Wulff:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement and Environmental Impact Report (Draft EIS/EIR) for the Bay Delta Conservation Plan (BDCP). SMUD is the primary energy provider for Sacramento County and as such, would provide electricity for any of the BDCP components constructed or operated in our service 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. As a utility provider for a portion of the anticipated impact area, SMUD has a direct interest in the impacts resulting from our participation in the construction and operation of electrical facilities needed to serve the proposed project and implementation of any relevant mitigation measures.

SMUD staff did not read the entire Draft EIS/EIR, but generally focused on Alternative 4. Based on our review of the Draft EIS/EIR and our understanding of the proposed project, SMUD offers the following input:

1. General

- A. Transmission lines are defined as lines carrying voltage greater than 100 kilovolt (kV); subtransmission lines carry voltages between 69 and 99kV; and distribution lines carry voltages less than 69kV.
- B. SMUD is preparing a Habitat Conservation Plan for operation and maintenance activities and our proposed permit area overlaps with a portion of the BDCP area. SMUD is interested in working collaboratively with DWR to minimize discrepancies between mitigation measures required by the separate conservation plans.
- C. In regard to BDCP conservation and restoration areas being located within SMUD's service territory, the Final EIS/EIR and the BDCP itself should account for SMUD's right to utilize all of our construction, access, and maintenance easements.
- D. The EIS/EIR discusses the impacts associated with construction of the transmission lines for the project, but does not appear to address impacts associated with any distribution facilities (both lines and any distribution substations) that would be required for the project. SMUD respectfully requests that the lead agencies ensure the Final EIS/EIR addresses the environmental impact of upgrading, installing, and maintaining these facilities.

2. Chapter 3, Description of Alternatives

- A. Interconnection to SMUD facilities: The transmission alignment proposed under Alternative 4 would connect to the existing grid at a point north of Lambert Road and west of Highway 99. SMUD is currently undergoing a System Impact Study that will identify how SMUD can best provide electrical power to the project and any system improvements that may be required to ensure SMUD can serve the project and its existing customers. The results of this study may indicate a different interconnection location which may require additional environmental review unless the Final EIS/EIR accounts for an interconnection at this location.

- B. Transmission substation: Page 3-108, lines 39-41 describes the anticipated need for a new transmission substation, which would be approximately 2 acres (268 by 267 feet) in size. SMUD transmission substations are typically 5-10 acres, and the document should be amended accordingly. A practical concern is ensuring sufficient space to safely install the necessary transmission facilities.
- C. Page 3-109, lines 44 and 45, discusses the use of a dipped cross arm configuration that could be used to discourage raptor perching. SMUD does not typically or currently use this configuration, but would be willing to work with DWR to find a solution that addresses this concern.
- D. Phase Separation clarification: Page 3-110, lines 2-5 state that for 69kV lines, there would be 60 inches between the conductor and pole face. Please confirm whether this separation would be the result of materials placed on the conductors at each pole to create 60 inches of separation between perching opportunities and exposed wires, or whether the wires themselves would be constructed 60 inches apart. Would this standard also apply to distribution lines constructed or relocated for this project?
- E. Please identify the party responsible for identifying areas of raptor concern as discussed on page 3-110, lines 3 and 4. Will DWR or the local utility designate those areas?
- F. Material coating on monopole and lattice structures (page 3-110, lines 12-14): SMUD typically uses hot-dip galvanized steel that is dulled to reduce reflectivity as material for its poles. Please describe the material that would be used (both type and color) that would address reflectivity and visibility.

3. Appendix 3B, Transmission Line Design and Alignment Guidelines (3B.1.3)

This section discusses the electric and magnetic field (EMF) guidance to reduce magnetic fields for new facilities including reducing conductor (phase) spacing. This seems inconsistent with the raptor-safe design guidelines, which suggest 60 inches of separation between conductors, but no distance is given to minimize potential magnetic fields. SMUD will abide by the California Public Utilities Commission's (CPUC) seven interim measures regarding EMF from its November

1993 decision, which was affirmed on January 27, 2005, or the most current adopted guidance from the CPUC. The CPUC EMF Design Guidelines for Electrical Facilities have not been adopted by the CPUC and, therefore, at this time are only recommendations.

4. Avoidance and Minimization Measure 20, Greater Sandhill Crane

- A. Similar to Comment 2E, please confirm that DWR will identify the bird strike risk zones and greater sandhill crane winter use areas. Are these bird strike risk zones defined in Figure 2 of Attached 5J.C as all areas with a bird strike risk index of 1.0 or greater?
- B. SMUD is open to exploring the feasibility of undergrounding existing lines in high bird strike zones, but removing or relocating lines may be infeasible due to our obligation to provide power to our existing customers. SMUD has several concerns associated with construction and operation of underground transmission and subtransmission lines, including but not limited to: costs; increased environmental impacts associated with constructing the lines (i.e., the physical impacts from a trench exceed the impacts associated with installing poles); increased environmental impacts associated with maintenance of the lines; and potentially feasibility given the high water table, soil type, and seismicity. The Draft EIS/EIR discusses some of these concerns on pages 3-110 through 3-112.
- C. SMUD is willing to install and maintain flight diverters on all new permanent lines and existing lines in the highest risk zones at DWR's cost.

5. Avoidance and Minimization Measure 30, Transmission Line Design and Alignment Guidelines

There appears to be inconsistency between the text of BDCP Appendix page 3.C-70, lines 25 and 26, and EIR/EIS Appendix page 3B-10, lines 20 and 21 regarding reconfiguring of irrigation systems. The BDCP Appendix states that any reconfiguring of irrigation systems would be completed at the utility's (i.e., SMUD's) expense, while the EIS/EIR Appendix does not specify who would be

responsible for the expense. Although SMUD does anticipate that any facilities can be constructed to avoid impacts to existing irrigation systems, the EIS/EIR should be amended to consistently state that DWR, not SMUD, will pay for utility relocations required due to the BDCP.

6. Chapter 13, Land Use

- A. The Land Use section of the Draft EIR/EIS provides a detailed description of the proposed project (and project alternatives) impacts associated with transmission line development. These potential transmission related impacts could affect up to 61 acres of land designated for Low Density Residential, Nature Preserve, Commercial Office, and/or Recreation land uses within SMUD's service area, infrastructure footprint, and SMUD's non service area properties.
- B. This chapter did not include the impact acreages for Alternative 2C, but states that they would be similar to Alternative 1C. Please provide the impact areas.
- C. SMUD has wind resources in Solano County, and it does not appear that this section addresses potential impacts on those resources that might occur as a result of restoration activities or other project components in the vicinity.
- D. Impacts associated with utility easements and existing infrastructure are not described in the Land Use discussion and could result in additional incompatibilities. SMUD recognizes that there is some discussion of this impact in the Public Services and Utilities Section, starting on Page 20-123. Please ensure these issues are adequately addressed in the Final EIR/EIS.
- E. The Transportation Management Plan for Hood (required under Mitigation Measure Trans-1a for Alternative 1A) will need to be prepared in coordination with SMUD to ensure adequate access to our utility facilities in the area.

7. Chapter 17, Aesthetics and Visual Resources

The mitigation for visual impacts included potentially undergrounding transmission lines in areas where significant visual impacts would occur. SMUD

rarely installs transmission lines underground, as described above in section 4B, due to costs and additional construction and operational environmental impacts, but is willing to work with DWR to address this concern. The BDCP Mitigation Monitoring Plan should state that the project applicant is responsible for the funding of the associated aesthetic mitigation measures including but not limited to:

- A. Line or pole relocation;
- B. Undergrounding of transmission lines;
- C. Visual barrier and/or design treatment development;
- D. Easement acquisition; and
- E. Ongoing vegetation management activity.

8. Chapter 20, Public Services and Utilities

- A. SMUD has existing distribution lines throughout the project area including both the water conveyance system and Conservation Zone 4 that serve existing customers. Construction of the water conveyance system and any conservation activities may require relocation of SMUD facilities as described in Impact UT-6 and UT-8, respectively. DWR would be responsible for obtaining any easements and resolving any environmental issues. Also see comment 5 above regarding relocation costs.
- B. SMUD has not yet completed its System Impact Study that would determine any infrastructure needs required to provide electrical service to the BDCP project. Impact UT-7 states that construction of the permanent transmission lines would not require improvements to the existing physical power transmission system and that operation of the project would not result in disruption or relocation of facilities (page 20-128, lines 37-41). This statement does not mention construction of the water conveyance system (energy demands from tunnel construction) which may adversely impact SMUD's ability to provide service to existing customers without improvements. SMUD will not be able to determine whether this is likely to occur and whether any additional mitigation may be needed to continue to provide electricity to existing customers until the System Impact Study is complete. Accordingly, the Final

EIS/EIR should identify the potential impacts due to such improvements as well as the appropriate mitigation measures, if any.

9. Chapter 22, Air Quality

SMUD may not have the equipment required to comply with the environmental commitments that DWR has proposed and as described on page 22-229, lines 6-12 for its portion of the project, but is willing to work with DWR to reduce generation of criteria pollutants resulting from project construction.

10. Chapter 23, Noise

SMUD is willing to work with DWR to ensure that the proposed noise cancelling and vibration reducing mitigation measures are indeed feasible.

11. Chapter 24, Hazards and Hazardous Materials

Please ensure that SMUD will be included in the preparation of all plans for this project with which it will be required to comply, including but not limited to the stormwater pollution prevention plans, hazardous materials management plans, spill prevention, containment, and countermeasure plans, SAPs and a barge operations plan stated along with HAZ-1a and HAZ -1b, UT-6a and UT-6c, and TRANS-1a. (Note: It does not appear that SAP is defined in the document).

12. Chapter 25, Public Health

Impact PH-4 – As discussed above under comments on Appendix 3B, SMUD would abide by the CPUC's seven interim measures regarding EMF from its November 1993 decision, which was affirmed on January 27, 2005. The CPUC EMF Design Guidelines for Electrical Facilities have not been adopted by the CPUC and are, therefore, considered recommendations.

SMUD would like to continue to be kept apprised of the planning, development, and completion of this project. 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 Draft EIS/EIR. If you have any questions regarding this letter,

BDCP1678

please contact Emily Bacchini, SMUD Environmental Specialist at (916) 732-6334.
Emily will be the primary environmental point of contact for SMUD on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Ferrera', with a long horizontal line extending to the right.

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

cc: Emily Bacchini
Pat Durham
Steve Johns
Beth Tincher
Joe Schofield
Craig Cameron
Tony Deluca
Mike Deis
Corporate Files