

**DOCKETED**

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<b>Project Title:</b>	Compliance - Application for Certification for SMUD's Campbell Soup Cogeneration Project
<b>TN #:</b>	232898
<b>Document Title:</b>	SPA Campbell Cogeneration Project Water Storage Tank Petition to Amend
<b>Description:</b>	SPA's Petition for Post-Certification License Amendment
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**STATE OF CALIFORNIA**  
**STATE ENERGY RESOURCES**  
**CONSERVATION AND DEVELOPMENT COMMISSION**

<b>In the Matter of:</b>	)	<b>Docket No. 93-AFC-JC</b>
	)	
<b>Campbell Cogeneration Project</b>	)	<b>SPA's PETITION FOR POST-</b>
	)	<b>CERTIFICATION LICENSE</b>
_____	)	<b>AMENDMENT</b>

The Sacramento Power Authority ("SPA") hereby submits to the California Energy Commission ("CEC") this Petition for Post-Certification License Amendment ("Petition") for SPA's Campbell Cogeneration Project ("Project") pursuant to Section 1769(a), Title 20, California Code of Regulations. By this Petition, SPA proposes to repurpose an existing water storage tank to be used for fire suppression as well as install a new fire water pump and housing, and piping to connect them to each other and to the water supply system in order to eliminate the potential for backflow into the potable water system.

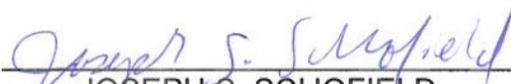
As an officer of SPA, I hereby attest, under penalty of perjury, under the laws of the State of California, that the contents of this Petition are truthful and accurate to the best of my knowledge and belief.

Respectfully submitted,

SACRAMENTO POWER AUTHORITY

LAURA LEWIS, Chief Legal Officer and General Counsel, by JOSEPH S. SCHOFIELD, Deputy General Counsel

Dated: April 29, 2020

  
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Fire Water Storage Tank for  
the Sacramento Power Authority's  
Campbell Cogeneration Project (93-AFC-3C)

Petition for Modification

April 2020

Sacramento Municipal Utility District





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## Acronyms and Abbreviations

AFC	Application for Certification
BMP	Best Management Practice
CARB	California Air Resources Board
CEC	California Energy Resources Conservation and Development Commission
City	City of Sacramento
COCs	Conditions of Certification
Condition	Condition of Certification
CPM	Compliance Project Manager
CSSC	Campbell Soup Supply Company LLC
LORS	laws, ordinances, regulations, and standards
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PTA	Petition to Amend
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SPA	Sacramento Power Authority
SPAC	Sacramento Power Authority at Campbell Cogeneration Project



## 1. Introduction

On November 30, 1994, the California Energy Commission (CEC) issued a license to the Sacramento Power Authority (SPA) for the construction and operation of the Sacramento Power Authority at Campbell Cogeneration Project (SPAC). SPAC is a nominal 158-megawatt cogeneration facility consisting of a Siemens V84.2 natural-gas-fired combustion turbine generator, a steam turbine generator, and associated equipment. The facility is located in the City of Sacramento (City), California, on approximately 5.8 acres adjacent to the former Campbell Soup Supply Company LLC (CSSC) facility (now known as the Capital Commerce Center), which was the project's steam host. SPAC is located in Sacramento County at 3215 47th Avenue. It is east of the corner of 47<sup>th</sup> Avenue and Franklin Boulevard, approximately 1 mile west of Highway 99. (Figure 1; figures are located at the end of each section).

On September 27, 2012, CSSC made a public announcement that it would close its South Sacramento facility in 2013. This would result in 700 CSSC employees being laid off. On October 30, 2012, the CSSC provided official written notice to the Sacramento Municipal Utility District (SMUD) of its intent to close the CSSC's Sacramento facility and terminate the Steam Sales Agreement between SMUD and CSSC effective October 30, 2013. The termination of the SSA in turn left SPAC without a viable steam host. On May 9, 2013, CSSC shut down all steam systems and ceased receipt of steam from SPAC. On May 16, 2013, SPA filed a Petition to Amend (PTA or Petition) for modification of Condition of Certification (Condition) EFF-1, which would allow SPAC to provide steam when there is a suitable steam host. That PTA was approved by the Commission on November 4, 2013.

SPA submitted a PTA on November 20, 2015 to use recycled water as makeup water for the cooling tower, which the Commission approved on July 13, 2016.

On November 2, 2018, SPA submitted a PTA to replace the existing combustion system with an in-kind system that included a wet compression system to increase electrical production during warm ambient conditions. The proposed combustion system replaced existing components with new, upgraded components. The PTA was approved by the Commission on January 11, 2019.

This petition for post-certification license amendment (Petition to Amend, or PTA) proposes the following actions:

- Repurpose an existing 100,000-gallon water storage tank to store potable water to be used for fire suppression.
- Install a new electric fire water pump and housing.
- Install a new a water connection to the existing water storage tank and a supply pipeline from the existing tank to the new fire water pump.
- Install a new water connection from the new fire water pump to the existing fire water protection system.

No additional construction activities at the SPAC site beyond what are described herein would be required as part of this PTA.

The environmental impact assessment, addressing potential impacts from the repurpose of the existing tank to store fire water, is presented in Section 3.0 and concludes there will be no significant adverse environmental impacts associated with the implementation of the actions specified in this PTA. The associated impacts to the environment would be less than significant, and in most cases would provide a community benefit. Therefore, not only will no adverse effects on the environment occur because of the changes to the project as proposed in this PTA, but some minor environmental benefits will occur, especially during drought years.

The project, as modified, will comply with all applicable laws, ordinances, regulations, and standards (LORS).

**1.1 Overview of Proposed Amendment**

The Commission approved the use of recycled water at the SPAC on July 13, 2016. During the recycled water system inspection by the Sacramento County Environmental Health Division performed a cross-connection survey and determined that there was an existing cross-connection between the cooling tower water and the fire system fed by the City of Sacramento’s drinking water distribution system. After review, the City decided the existing reduced pressure detector backflow prevention assembly was not adequate to prevent flow into the City’s drinking water distribution system from the cooling tower basin and recycled water. SPA in turn has developed a plan to repurpose an existing (100,000 gallon) condensate tank (used to receive condensate return from the former Campbell Soup facility) as a water/fire water storage tank to store potable water, which will completely separate the cooling tower basin and recycled water system from the City’s drinking water distribution system. The plan will require the replacement of the existing electric fire water pump located adjacent to the cooling tower with a new electric fire water pump located on an existing foundation near the new water/fire water storage tank. A detailed description of the proposed modification is included in Section 2.0. The Project vicinity is presented in Figure 1.

**1.2 Necessity of Proposed Changes**

The CEC Siting Regulations require a discussion of the necessity for the proposed revisions to certification and whether the amendment is based on information known by the petitioner during the certification proceeding (Title 20, CCR, Sections 1769 (a)(1)(B) and (C)).

The proposed changes will not impact the function or operation of the SPAC, nor will they alter the basis of the Commission Decision. (CEC, 1994).

**1.3 Need for Modification was Not Known at the Time of Certification**

The proposed project was not considered when the Project was licensed in 1994.

**1.4 Why the Change should be Permitted**

The proposed Project revision would allow the use of recycled water in the cooling tower, preserving potable water for other uses for which recycled water would not be appropriate.

**1.5 Consistency of Proposed Changes with Applicable Laws, Ordinances, Regulations, and Standards**

The CEC Siting Regulations also require a discussion of the consistency of the proposed project revision with the applicable laws, ordinances, regulations, and standards (LORS) and whether the modifications are based on new information that changes or undermines the assumptions, rationale, findings, or other basis of the final decision (Title 20, CCR, Section 1769 (a)(1)(D)). If the project would no longer be consistent with the decision as the result of requested project modifications, the PTA must provide an explanation as to why the modification(s) should be permitted.

The proposed Project modifications requested by the PTA were not known at the time of licensing and are consistent with all applicable LORS, as discussed in Section 3.0. This PTA is not based on new information that changes or undermines any basis for the Commission Decision (CEC, 1994). SPA would continue to operate in compliance with all applicable LORS. Therefore, the findings and conclusions contained in the Commission Decision (CEC, 1994) would remain applicable to the Project, as modified.

## **1.6 Summary of Environmental Impacts**

The CEC Siting Regulations require that an analysis be conducted to address the potential impacts the proposed modifications may have on the environment and to propose measures to mitigate any potentially significant adverse impacts (Title 20, CCR, Section 1769 (a)(1)(E)). The regulations also require a discussion of the modifications' impact on the Project's ability to comply with applicable LORS (Section 1769 (1)(a)(F)). Section 3.0 of this PTA includes a discussion of the potential environmental impacts associated with the modification(s) as well as a discussion of the consistency of the modification(s) with the LORS. Section 3.0 concludes that there would be no significant environmental impacts associated with implementing the actions specified in this PTA and that the Project, as modified, will comply with all applicable LORS and will provide an environmental/economic benefit.

## **1.7 Conditions of Certification**

This PTA proposes to repurpose an existing water tank, install water connections, and install a new fire water pump within the existing SPAC site. As demonstrated in Section 3 of this PTA, the Project does not result in a new significant impact requiring mitigation. Therefore, no new Conditions of Certification (COCs) are required and revisions to existing COCs are not necessary to accommodate the proposed modification(s).



**Figure 1. Project Vicinity Map**  
SPA Campbell Cogeneration Project



## 2. Description of Proposed Amendment

SPA proposes to repurpose an existing (100,000 gallon) condensate tank (used to receive condensate return from the former Campbell Soup facility) as a water/fire water storage tank (water storage tank) to store potable water, completely separating the City of Sacramento's drinking water distribution system from the cooling tower basin and all recycled water. The plan requires the replacement of the existing electric fire water pump located adjacent to the cooling tower with a new electric fire water pump to be installed on an existing foundation near the existing water/fire water storage tank. The new fire water pump and housing will be available for installation on June 4, 2020.

A new suction line (approximately 20 feet in length) from the water storage tank to the fire water pump will be installed, requiring several pipe supports to be installed. The pipe supports will require small footings (approximately 12 inches wide by 12 inches long by 12 inches deep) to be installed in the paved area between the water storage tank and the fire water pump. A new discharge line (approximately 20 feet in length) will also be required, requiring several footings of the same dimensions as the suction line. Figure 2 shows the location of the water storage tank, fire water pump, and the new water pipes. Figure 3 shows the fire water pump suction and discharge lines design.

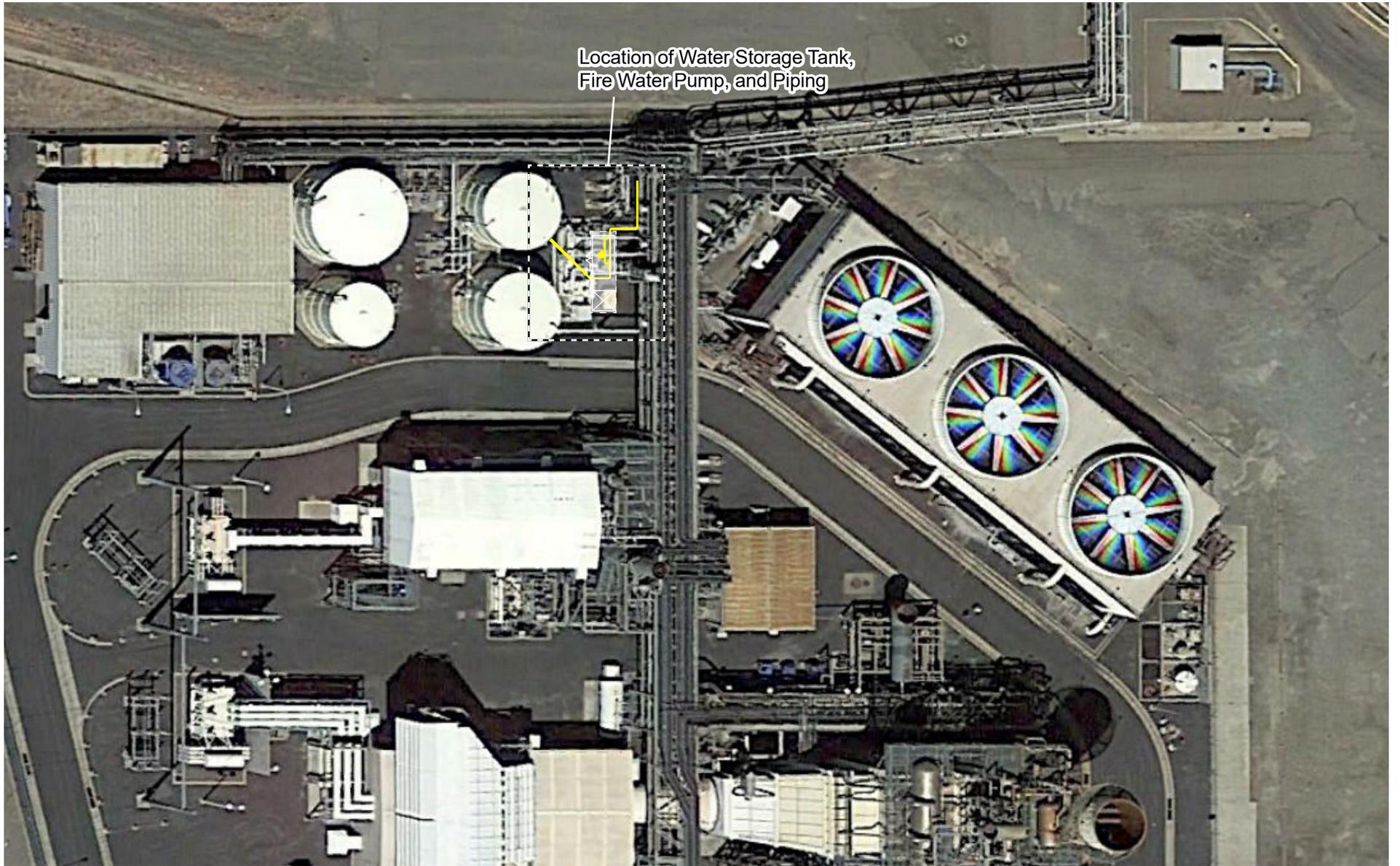
The installation of the fire water pump will require approximately 12 workdays to complete, with a workforce of up to 14 (craft and supervisors). Construction equipment required includes a fork lift and a manlift. The fire water pump housing will require a crane to move the housing from the delivery truck to the foundation. Construction is expected to occur between the hours of 7 am to 6 pm, Monday to Saturday.

The fire pump is required to be in service prior to the expiration of the SPAC's air quality Authority to Construct authorizing the use of recycled water in the cooling towers. SPA is commencing portions of the project including installing electrical conduits in existing racks, relocating a water fill line to the repurposed fire water storage tank, and other reversible aspects of the project. The Authority to Construct expires on July 22, 2020. Reversible work, such as installing electrical/signal conduits and water connections on water storage tank, is ongoing.

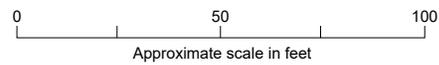
No operational impacts are expected in connection with the proposed modification(s).

The potential environmental impacts associated with the proposed project are evaluated in Section 3.0.





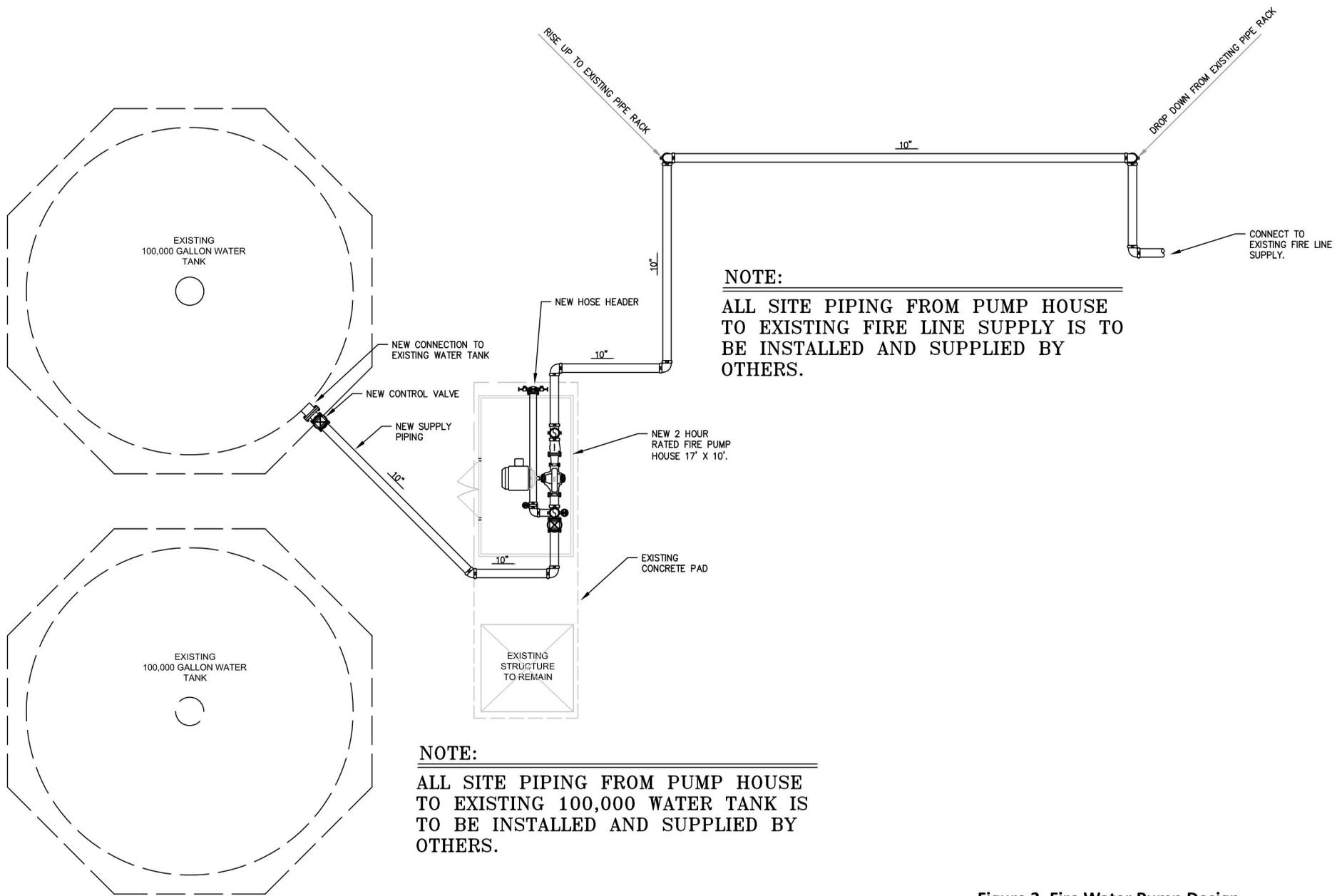
Note: Locations are approximate.



**Figure 2. Water Storage Tank Equipment**  
SPA Campbell Cogeneration Project

**Jacobs**





**NOTE:**  
 ALL SITE PIPING FROM PUMP HOUSE  
 TO EXISTING FIRE LINE SUPPLY IS TO  
 BE INSTALLED AND SUPPLIED BY  
 OTHERS.

**NOTE:**  
 ALL SITE PIPING FROM PUMP HOUSE  
 TO EXISTING 100,000 WATER TANK IS  
 TO BE INSTALLED AND SUPPLIED BY  
 OTHERS.

**Figure 3. Fire Water Pump Design**  
 SPA Campbell Cogeneration Project



### **3. Environmental Analysis of Proposed Project Amendment**

The repurposing of the water storage tank includes the installation of a new fire water pump, fill and fire water pump suction lines from the water storage tank, and a discharge line from the fire water pump to the existing fire water loop. The suction and discharge lines will require minor excavations for the footings (12 inches by 12 inches by 12 inches) in a paved area of the project site where subsurface excavation has previously occurred. Furthermore, the proposed modifications are not expected to result in any operational impacts not analyzed in the original SPAC license or subsequent amendments. As described below, the impacts associated with this PTA will be less than significant.

The following subsections present a discussion of the potential impacts that the proposed project modification(s) may have on the environmental analysis, as presented in the Application for Certification (AFC). More detail is provided for those areas where the potential for a significant impact exists.

#### **3.1 Air Quality**

The Project is located in Sacramento County. Sacramento County, which is currently classified as “attainment” for the state and federal ambient air quality standards for all pollutants except the federal 8-hour ozone and ultra-fine particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) standards, and the state ozone and particulate matter less than 10 microns in diameter (PM<sub>10</sub>) standards.

The project construction is anticipated to take a total of 12 work days with up to 14 workers. Much of the work will involve installation of piping between the water storage tank and the fire water pump and to the existing fire water loop. This work will require several forklifts/manlifts and a crane. The number of construction workers and equipment for the proposed modification is significantly less than the number of workers/construction equipment required during a routine maintenance outage. Therefore, construction emissions are expected to be less than significant.

In order to reduce emissions during construction, and in compliance with the Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule 403, SMUD will implement the following Best Management Practices (BMPs) as appropriate:

- 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.
- 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 would be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day.
- Limit vehicle speeds on unpaved roads to 15 miles per hour.
- All roadways, driveways, sidewalks, parking lots to be paved would 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.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificates of compliance for the California Air Resources Board's (CARB's) In-Use Off-Road Diesel-Fueled Fleets Regulation
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment would be checked by a certified mechanic and determine to be running in proper condition before it is operated.

The 1994 Commission Decision approving the construction of the SPAC found the project to be in compliance with all applicable LORS. The proposed Project is consistent with all applicable LORS and is not expected to alter the assumptions or conclusions made in the Commission Decision.

No operational air quality impacts beyond those analyzed in the original license and subsequent amendments are expected.

No modification to the Air Quality Conditions of Certification are proposed.

### **3.2 Biological Resources**

The proposed project occurs entirely within the existing SPAC site, which does not include any natural habitat. The closest habitats (the landscaping trees along 47<sup>th</sup> Avenue and the rail siding to the west) are over 300 feet from the proposed work site. Therefore, construction of the proposed project is not expected to significantly impact biological resources and does not change the biological resources impact analysis conclusions as presented in the 1994 Commission Decision or subsequent amendments for the Project. In fact, implementation of the Biological Resources Conditions of Certification will reduce any biological resource impacts further by reducing use of potable water from the Lower American River watershed.

No operational biological resource impacts beyond those analyzed in the original license and subsequent amendments are expected.

The Project modification(s) would comply with applicable LORS and would not require any changes to the Biological Resources Conditions of Certification.

### **3.3 Cultural and Tribal Resources**

The footings for the pipe supports are expected to extend 12 inches below the surface of existing asphalt. Excavations during construction are not expected to impact native soils. As such, Cultural and Tribal resource impacts are not expected.

No operational cultural or Tribal resource impacts beyond those analyzed in the original license and subsequent amendments are expected.

The Project modification(s) would comply with applicable LORS and would not require any changes to the Cultural Resources Conditions of Certification.

### **3.4 Geologic Hazards and Resources**

Construction of the proposed project will be designed in accordance with current building code and seismic requirements, and the facilities will be installed in areas already assessed for geologic hazards. Therefore, project implementation will not be susceptible to any geologic hazards greater than those previously analyzed by the CEC during licensing of the Project, and the conditions imposed in the 1994 Commission Decision are adequate to protect the environment with respect to geological resources.

The Project modification(s) would comply with applicable LORS and would not require any changes to the Geologic Hazards and Resources Conditions of Certification.

No operational geologic hazards or resource impacts beyond those analyzed in the original license and subsequent amendments are expected.

Hence, the Project modification(s) will comply with applicable LORS and will not require a change to any of the Geologic Hazards Conditions of Certification.

### **3.5 Hazardous Materials Management**

The construction of the proposed Project will involve the use of hazardous materials associated with normal construction activities, including diesel fuel, gasoline, lubricants/oils/grease, welding rods/wire, gasket sealer, rust inhibitor coatings, and very minor construction debris. Due to the short duration of construction, it is unlikely that construction equipment/vehicle maintenance will be required. Therefore, the only significant construction hazardous material present during construction activities will be equipment/vehicle fuels (diesel and gasoline) and hydraulic fluid. In the unlikely event of a release, a spill containment kit will be available at the work sites to contain/clean up any releases. Construction impacts due to hazardous materials being present on site will be reduced through the implementation of the applicable COCs. The modifications proposed to the Project are also consistent with all applicable LORS.

No operational hazardous materials impact beyond those analyzed in the original license and subsequent amendments are expected.

No changes are required to the existing Hazardous Materials Management Conditions of Certification and no new Hazardous Materials Management Conditions of Certification are required.

### **3.6 Land Use**

The Project vicinity is zoned heavy industrial (M-2) by Sacramento County. The construction of the proposed project will not result in any land use impacts beyond those analyzed in the 1994 Commission Decision or subsequent license amendments. In addition, the Project will comply with applicable LORS, and will not require a change to any of the Land Use Conditions of Certification.

### **3.7 Noise**

Construction is expected to require 12 days and relatively few pieces of construction equipment to complete. Construction will occur during the day between the hours of 7 am to 6 pm, Monday to Saturday. Given the project vicinity's industrial nature, construction noise is not expected to result in significant noise impacts.

There will be no operational noise from the proposed project.

Therefore, the COC imposed in the 1994 Commission Decision on construction noise levels are adequate to protect the environment. The modification(s) to the Project will also comply with applicable LORS during construction and will not require any changes to the Noise Conditions of Certification.

### **3.8 Paleontological Resources**

The footings for the pipe supports are expected to extend 12 inches below the surface of the existing asphalt. Excavations during construction are not expected to impact native soils. As such, paleontological resource impacts are not expected.

No operational paleontological resource impacts beyond those analyzed in the original license and subsequent amendments are expected.

The Project modification(s) would comply with applicable LORS and would not require any changes to the Paleontological Resources Conditions of Certification.

### **3.9 Public Health**

Construction of the proposed project is expected to take 12 days to complete. Given the short duration of construction, the likelihood of the Project modification(s) resulting in a significant public health impact is unlikely. Furthermore, the Project modification(s) will comply with the SMAQMD's Best Management Practices to reduce construction particulate matter impacts to a less than significant level. Construction is

expected to comply with applicable LORS and no changes to any Public Health Conditions of Certification are proposed. Therefore, the public health impacts are not expected to be greater than those analyzed in the Commission Decision.

No operational public health impacts beyond those analyzed in the original license and subsequent amendments are expected.

### **3.10 Socioeconomics**

The proposed project will result in a small, positive impact due to investment in labor costs being expended in the Sacramento region. The small workforce and short construction duration will not result in any impacts to population, housing, employment patterns, community services (law enforcement, fire services, and parks and recreation). Additionally, no impact to environmental justice areas are expected and will not require a change to any of the Socioeconomics Conditions of Certification. Therefore, no significant, negative socioeconomic impacts are expected due to construction.

No operational socioeconomic impacts are expected from the proposed project.

### **3.11 Soils**

The proposed project construction will not result in soils impacts beyond those analyzed in the 1994 Commission Decision and subsequent amendments. Construction will likely not impact native, undisturbed soils during installation of the pipe footings. Surrounding areas are currently covered with asphalt and implementation of Conditions of Certification, as necessary, will prevent soil erosion. Construction will comply with all applicable LORS. There will be no impacts to soils from the operation of the proposed project. No changes to the Soils Conditions of Certification are required to address soils.

### **3.12 Transportation**

Construction proposed project will not result in any transportation impacts as all construction will occur on the SPAC site, with construction taking only 12 days. Material deliveries required for this project change can be completed in several truck deliveries. Therefore, transportation impacts are not expected.

Construction is expected to comply with applicable LORS without needing to modify existing and no new or modified Transportation Conditions of Certification are necessary. Therefore, the conclusions reached in the Commission Decision are still applicable.

No operational transportation impacts beyond those analyzed in the original license and subsequent amendments are expected.

### **3.13 Visual Resources**

The proposed modifications will not result in any visual impacts from construction or operation. The new fire water pump and housing will not be visible from public rights-of-way. Consequently, the proposed project will not cause any visual resources impacts greater than those previously analyzed by the CEC during licensing (CEC, 1994). In addition, the proposed project will comply with applicable LORS and will not require a change to any of the Visual Resources Conditions of Certification.

### **3.14 Waste Management**

The proposed project will not significantly affect waste management because the construction work will be minor and construction waste materials will be disposed of as required by current LORS and COCs. Therefore, the Project will comply with applicable LORS and will not require any changes to the Waste Management Conditions of Certification.

No operational waste management impacts beyond those analyzed in the original license and subsequent amendments are expected.

### **3.15 Water Resources**

The construction of the proposed project will allow SPA to replace the use of potable water in the cooling tower with recycled water, resulting in an environmental benefit. As no significant excavation is required, no water will be required for dust suppression.

Water resources will be protected by implementing Water Resources Conditions of Certification by installing BMPs as necessary to minimize soil erosion and water resource impacts. Impacts to water resources are not expected and will not require any changes to the Water Resources Conditions of Certification.

No operational water resource impacts beyond those analyzed in the original license and subsequent amendments are expected.

### **3.16 Worker Safety and Health**

During the construction of the proposed project, safe work practices will be followed to reduce the potential of recordable work incidents. Due to the small construction workforce, construction of the proposed modifications will not create any worker safety and health impacts for either the construction or operation of the Project modification(s) beyond those analyzed in the 1994 Commission Decision. Therefore, the Project will comply with applicable LORS and will not require any changes to the Worker Health and Safety Conditions of Certification.

### **3.17 Energy**

The construction of the proposed project will consume energy in the form of vehicle fuel and electricity. This energy consumption is not wasteful as it will allow SPA to repurpose an existing water tank, facilitating the replacement of potable water use in the cooling tower with recycled water. Based on the minimum number of construction workers, construction equipment, and the short construction window, the expected energy consumption during construction will be insignificant relative to the regional energy use. Therefore, energy impacts due to construction of the Project modification(s) are expected to be less than significant.

No operational energy impacts are expected.

### **3.18 Wildfires**

The SPAC is located in highly urbanized areas with a low potential for wildfires. Furthermore, the construction site is supported by the City of Sacramento fire water system and the nearest fire station is located less than 1/2 mile away (City of Sacramento Fire Station 56 located on 47<sup>th</sup> Avenue). Therefore, the potential impacts due to wildfires is less than significant.

No operational wildfire impacts are expected as the proposed project will store fire water and will not increase the wildfire risk.



## **4. Potential Effects on the Public**

In accordance with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(G)), this section discusses the potential effects on the public that may result from the modifications proposed in this PTA.

With the implementation of the modifications proposed, the repurposing of an existing water tank would have no adverse effect on the public. As previously mentioned, the construction activity associated with the proposed modification would be of short duration and minor in scope, resulting in minimal disturbance. The other associated impacts to the environment would be less than significant.



## **5. List of Property Owners**

Consistent with the CEC Siting Regulations Section 1769(a)(1)(H), a list of property owners adjacent or near the proposed project is provided under a separate cover.



## **6. Potential Effects on Property Owners, the Public, and Parties in the Proceeding**

This section addresses potential effects of the Project modifications proposed in this PTA on nearby property owners, the public, and parties in the application proceeding, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769 (a)(1)(I)).

The proposed modifications' effects on adjacent land owners would not differ significantly compared with the Project as previously certified and amended. As the proposed modification would be short-term (only 12 days) and use a small construction crew; thus, disturbance in the project vicinity would be minimal and the associated impacts to the environment would be less than significant.



## **7. References**

California Energy Commission (CEC). 1994. Commission Decision, Application for Certification of the Sacramento Power Authority Campbell Soup Cogeneration Project (93-AFC-03C). November 30.



