

# Sacramento Cogeneration Authority

P.O. Box 15830, Sacramento, CA 95852-1830 • 916/732-5218

Procter & Gamble Cogeneration Project

SCA 94-088

May 11, 1994

**DOCKET  
93-AFC-2**

DATE: MAY 11 1994

RECD: MAY 11 1994

Mr. B. B. Blevins  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Attn: Docket Unit

**RESPONSE TO BIOLOGY CHAPTER IN THE PROCTER AND GAMBLE COGENERATION  
PROJECT PSA AND COPY OF THE SPRING BIO SURVEY FOR THE AMENDED  
PORTION OF THE PROCTER AND GAMBLE PROPOSED TRANSMISSION LINE ROUTE  
(DOCKET NO. 93-AFC-2)**

Dear Mr. Blevins:

Please find enclosed, SCA's response to the CEC's preliminary staff assessment on biology. SCA submits to biological mitigation in the amount of \$103,000 proposed by CEC staff and presents a differing methodology for calculating mitigation and proposes biological surveys in lieu of aerial photography. Also enclosed is the April 1994 biological survey for the amended portion of the Procter and Gamble proposed transmission line route.

Please telephone me at (916) 732-6540, if you have any questions.

With Regards,

Diana Parker  
Environmental Specialist

Enclosures

cc: Rich Champman, B&V  
Ron Simms, Walsh  
Darrel "H" Woo, CEC

**STATE OF CALIFORNIA**

**State Resources Conservation  
and Development Commission**

In the matter of:	)	Docket No. 93-AFC-2
	)	
Application for Certification	)	PROOF OF SERVICE
of the Sacramento Cogeneration	)	(rev. 12/3/93)
Authority's Procter & Gamble	)	
Cogeneration Project	)	

**PROOF OF SERVICE**

I, Evangeline Parchamento, declare that on May 11, 1994, I deposited copies of the attached Response to Biology Chapter in the Procter and Gamble cogeneration project PSA and copy of the Spring Bio Survey for the amended portion of the Procter and Gamble proposed transmission line route (Docket No. 93-AFC-02), in the United States mail at Sacramento, California, with first class postage thereon fully prepaid and addressed to the following:

**APPLICANT**

Ms. Susan Strachan, Manager  
Projects Permitting & Licensing  
SMUD  
Box 15830  
Sacramento, CA 95852-1830

Steve Cohn  
Senior Attorney  
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**INTERESTED AGENCIES**

Richard Johnson  
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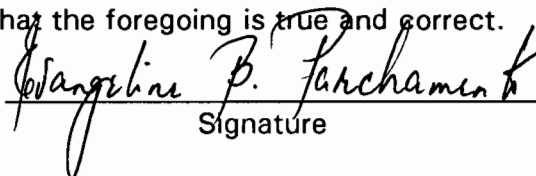
Ray Menebroker, Chief Project  
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P. O. Box 2815  
Sacramento, CA 95814

Ed Schnabel  
Sacramento Metropolitan Water District  
5331 Walnut Avenue  
Sacramento, CA 95841

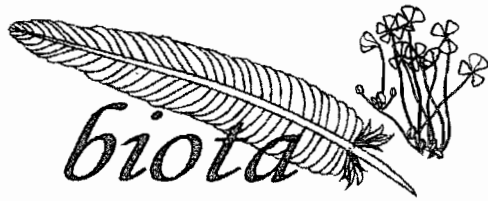
**CALIFORNIA ENERGY COMMISSION**  
(Docket Unit - 12 copies required)

Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814

I declare under penalty of perjury that the foregoing is true and correct.

  
Signature

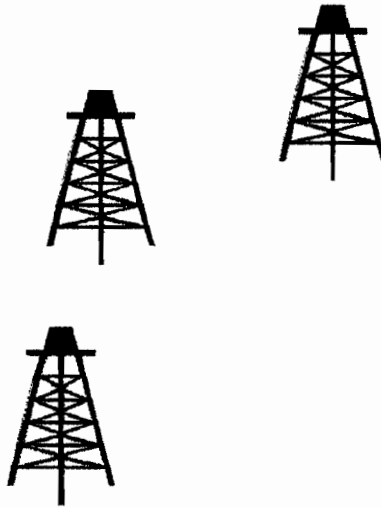
Attachment



2953 24th Street, Sacramento, CA 95818  
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# Spring Bio Survey



*Amended portion of Procter and Gamble  
Proposed Transmission Line Route*

**.for ESA / SMUD**

**Debby Martin**

**April 1994**

## **Summary**

On April 7, 1994, *biota* biologist Debby Martin conducted a biological survey of the 0.5 mile realignment of the Procter and Gamble transmission line route. Also present during the survey were Mike Deis of SMUD, Dick Anderson of California Energy Commission, and E.J. Kofford of Ebasco. The width of the study corridor for botanical purposes was 200 feet, and for raptor studies was 1/2 mile. The purpose of the survey was to determine, during the appropriate seasonal survey window, whether any special habitat or sensitive plant or animal species was present within the study area and if so, to determine the potential impact on it from the proposed transmission line activities. The sensitive habitats and species considered were those from the CNDDDB printouts, included in Dames and Moore's 1992 Biological Assessment Report, Procter & Gamble Cogeneration Plant, SMUD Ancillary Facilities Sacramento, California, for Sacramento Municipal Utility District; namely Elderberry savanna, Valley elderberry longhorn beetle, Burrowing owl, and Bank swallow; and any raptors. Although appropriate nesting and foraging habitat for burrowing owl is present within the property surveyed, none of the sensitive resources were found to be present within the survey corridor and no significant biological effects are expected from the project.

## ***Methods and Results***

A walking transect of the study corridor was conducted and all plant and animal species observed were recorded ( See species tables).

Nearly all of the plants recorded are considered ruderal species (common in waste places) and no sensitive plant species were encountered.

For wildlife, particular attention was paid to potential burrowing owl habitat on the earth bases (pedestals) of the existing transmission towers and the faces of the cuts below the fence lines on the east side, where numerous ground squirrel burrows occur.

Evidence of old whitewash was observed at the entrance of several burrow entrances, although no recent evidence of owl use was noted, such as pellets or prey remains. Clearly, owls have used the area in the past but are not now in evidence.

Unidentified raptor pellets were collected beneath the existing transmission towers. They were not the size or shape of burrowing owl pellets. The pellets were dissected in the lab and remains of Botta's pocket gopher, *Thomomys bottae*, were identified. Other small rodent remains were not identifiable. One red-tailed hawk was observed foraging over the area. It is assumed that the pellets collected had been deposited by a hawk perching on the transmission line.

No raptor nests or potential nest sites were observed within the survey area.

# Wildlife Species Recorded

## Observed in Survey Area 4/7/94

<b>Scientific Name</b>	<b>Common Name</b>
<i>[Acrididae]</i>	Grasshopper
<i>Bombus sp.</i>	Bumble bee
<i>Hippodamia convergens</i>	Convergent ladybug beetle
<i>[Lycaenidae]</i>	Blue butterfly
<i>[Pieridae]</i>	Sulphur butterfly
<i>Tipula sp.</i>	Crane fly
<i>Sceloporus occidentalis</i>	Fence lizard
<i>Anthus rubescens</i>	American pipit
<i>Buteo jamaicensis</i>	Red-tailed hawk
<i>Callipepla californica</i>	California quail
<i>Columba livia</i>	Rock dove
<i>Dendroica coronata</i>	Yellow-rumped warbler
<i>Euphagus cyanocephalus</i>	Brewer's blackbird
<i>Hirundo pyrrhonata</i>	Cliff swallow
<i>Hirundo rustica</i>	Barn swallow
<i>Passerculus sandwichensis</i>	Savannah sparrow
<i>Stemella neglecta</i>	Western meadowlark
<i>Stumus vulgaris</i>	European starling
<i>Tyrannus verticalis</i>	Western kingbird
<i>Zenaidura macroura</i>	Mourning dove
<i>Canis latrans</i>	Coyote (scat)
<i>Lepus californicus</i>	Black-tailed jackrabbit
<i>Spermophilus beecheyi</i>	California ground squirrel squirrel
<i>Thomomys bottae</i>	Botta's pocket gopher (owl pellet)

# Botanical Species Recorded

## Plants Observed in Survey Area 4/7/94

Scientific Name	Common Name
<i>Amsinckia</i> sp.	Fiddleneck
<i>Anagallis arvensis</i>	Scarlet pimpernel
<i>Avena fatua</i>	Wild oats
<i>Baccharis</i> sp.	Coyote brush
<i>Brassica campestris</i>	Field mustard
<i>Brassica nigra</i>	Black mustard
<i>Briza minor</i>	Little quaking grass
<i>Brodiaea</i> sp.	Brodiaea
<i>Bromus diandrus</i>	Ripgut brome
<i>Calandrinia ciliata</i>	Red maids
<i>Capsella bursa-pastoris</i>	Shepherd's purse
<i>Centaurea solstitialis</i>	Yellow star thistle
<i>Cerastium vulgatum</i>	Mouse-eared chickweed
<i>Erodium botrys</i>	Long-beaked storksbill
<i>Erodium cicutarium</i>	Red-stem filaree
<i>Fraxinus velutina</i>	Arizona ash
<i>Geranium molle</i>	Dove's foot
<i>Hemizonia</i> sp.	Tarweed
<i>Hordeum leporinum</i>	Hare barley
<i>Lolium perenne</i>	Italian ryegrass
<i>Lotus corniculatus</i>	Birdsfoot lotus
<i>Lupinus bicolor</i>	Miniature lupine
<i>Matricaria matricarioides</i>	Pineapple weed
<i>Medicago polymorpha</i>	Bur clover
<i>Medicago sativa</i>	Alfalfa
<i>Montia perfoliata</i>	Miner's lettuce
<i>Orthocarpus campestris</i>	Field owl's clover
<i>Orthocarpus lithospermoides</i>	Cream sacs
<i>Populus fremontii</i>	Fremont's cottonwood
<i>Raphanus sativa</i>	Wild radish
<i>Plantago lanceolata</i>	English plantain
<i>Senecio vulgaris</i>	Common butterweed
<i>Sonchus oleraceus</i>	Common sow thistle
<i>Spergula arvensis</i>	Corn spurry
<i>Vicia villosa</i>	Winter vetch

# References Used

Burt, W.H. and R.P. Grossenheider. 1976. A Field Guide to the Mammals. Houghton Mifflin Company.

Dames & Moore. 1992. Biological Assessment Report: Procter & Gamble cogeneration plant; SMUD ancillary facilities ; for Sacramento Municipal Utility District. (unpublished report).

Ingles, L.G. 1954. Mammals of California and its coastal waters. Stanford University Press.

Jameson, E.W. Jr. and H.J. Peeters. California Mammals. 1988 ed. University of California Press, Berkeley.

Niehaus, T.F. and C.L. Ripper. 1976. A Field Guide to Pacific States Wildflowers. Houghton Mifflin Co.

Peterson, R.T. 1990 Third Edition. A Field Guide to Western Birds. Houghton Mifflin Co.

University of California . 1992 edition The Grower's Weed Identification Handbook. UC Cooperative Extension, Division of Agriculture and Natural Resources.

Woodward-Clyde Consultants. 1993. Realignment of a portion of the 230 kV transmission line for the Procter and Gamble cogeneration project; Amendment 1. Presented to the California Energy Commission (an unpublished report).



BIO-5

The project owner will pay the non-refundable sum of \$103,000 to purchase replacement habitat as compensation for direct, indirect, temporary, secondary and cumulative impacts to potential biological resources caused by the construction and operation of the power plant and related facilities, including the transmission line and fiber optic line. The \$103,000 mitigation payment is premised upon 20.6 acres of impact mitigation as calculated by CEC staff, calculated at \$5,000 per acre (for land acquisition, administrative and closing costs, immediate improvement and management in perpetuity).

Of the 20.6 acres of mitigation, 2.5 acres represent mitigation for the temporary impacts to the 5-acre laydown area. If the impacts to the 5-acre laydown area become permanent (i.e. longer than 5 years), then the project owner shall pay an additional \$2,500 per acre (or portion thereof) that is permanently impacted.

The \$103,000 payment required above represents the total amount of compensation required for biological mitigation. If biological ground surveys taken after construction indicate that more land is disturbed than anticipated, then the project owner will provide additional compensation at the rate of \$5,000 per acre (or portion thereof) for each additional acre permanently disturbed or \$2,500 per acre for each additional acre temporarily disturbed.

Verification: To be provided by staff.

BIO-6

The project owner will be responsible for conducting biological ground surveys to determine the precise number of acres which are impacted beyond the 20.6 acres as described in BIO-5. Biological protocol will be followed to assess and evaluate the actual project impacts before and after construction for the transmission/fiber optic line. If it is determined at the end of a 2-year period following construction that revegetation efforts have been successful (i.e. at least 75 percent of disturbed vegetation has recovered), then it will be concluded that no permanent impacts to the area occurred, and CEC will remit back to project owner \$10,000. Any portion of the transmission/fiber optic line construction area which has not recovered after 2 years will be considered a temporary loss, and be mitigated for at the rate of \$2,500 per acre.

Biological surveys will be conducted by a biologist acceptable to project owner and CEC staff.

Verification: To be provided by staff.

## SCA SUMMARY OF THE PROPOSAL FOR PROCTER AND GAMBLE COGENERATION PROJECT MITIGATION

### BACKGROUND

The Sacramento Cogeneration Authority (SCA) and the California Energy Commission (CEC) have been negotiating mitigation measures to be implemented for potential impacts to biological resources at the Procter and Gamble Cogeneration Project site. SCA staff and CEC staff disagree on the value of the biological resources which could be potentially impacted and appropriate mitigation ratios for land replacement. Although SCA is submitting to the mitigation requirement of the CEC<sup>1</sup>, this document states the position of SCA staff, and SCA's recommendation on mitigation for impacts to potential biological resources.

This summary discusses the potential impacts and mitigation for the project site, transmission/fiber optic line and the temporary construction laydown area. Attachment 1 provides a full discussion of the potential impacts and mitigation for these areas.

### SCA MITIGATION PROPOSAL FOR ACTUAL AND POTENTIAL PROJECT IMPACTS

**Actual project impacts** are those impacts which occur as the direct result of project construction and operation. To address the potential impacts to biological resources at the site, mitigation would occur for the permanent loss of 10 acres of potential biological habitat, including "depressions" which contain water seasonally and any and all "indirect", "secondary" and "temporary" impacts to any area of the project which are believed to result from project construction and operation, including temporary impacts to the area of the transmission/fiber optic line. This would be proposed because any and all identified vernal pools would be avoided, and any impacts to potential biological resources would be of very short duration and be considered insignificant. Traditional mitigation for an area such as the project site would not be expected to be mitigated beyond a 1:1 ratio. SCA would propose, however, to mitigate for the impact to the 10 acres, depressions, indirect, secondary and temporary impacts which are believed to result at a ratio of 1.5 replacement acres for each 1.0 acre impacted for a total of 15 acres. This would be accomplished through remuneration to the CEC. This proposal is consistent with recommendations from the U.S. Fish and Wildlife Service and Department of Fish and Game for projects where low-value biological resources are concerned. Although the biological value of the project site is low, SCA staff would compensate over and above its resource value.

**Potential project impacts** are possible impacts which may occur along the transmission/fiber optic line and the temporary construction laydown area. These impacts would be minimized through best construction practices, careful scheduling and siting of facilities for project construction. Impacts to potential biological resources may occur, however it is anticipated

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<sup>1</sup> \$103,000 for a calculated 20.6-acre impact

that the impacts would be minor and short-lived. CEC staff believe that up to 7 acres (2 acres along the transmission/fiber optic line and 5 acres for the temporary construction laydown area) may ultimately be impacted. SCA would propose that no significant resources (including vernal pools) would be impacted by project construction, therefore no mitigation would be proposed.

Restoration for the transmission/fiber optic line would consist of recontouring any disrupted soils and revegetating any area affected by project construction. Restoration for the temporary construction laydown area would include removal of gravel placed to provide working surface for temporary activities, re-contouring the site and limited revegetative efforts. Revegetation would consist of a single revegetative effort of the 5-acre area with no follow-up monitoring or additional restorative efforts. As discussed in detail in Attachment 1, this area is required to be disced annually, which precludes its future as a significant biological resource. Additionally, the property is owned by Procter and Gamble. SCA could not be responsible for future activities/development of the site.

SCA would reserve the option to not restore the temporary construction laydown area, instead opting to provide remuneration for land purchase to the CEC. Within 90 days of construction completion, SCA would evaluate this option, and either restore the site as described above, or provide payment for mitigation land purchase.

#### SUMMARY

According to accepted methods of placing value on biological resources, the biological value of the project site is very low, and is not regarded as a potentially significant resource area. In spite of this documented low value, SCA staff would propose to replace acres lost due to construction of the project at a ratio of 1.5 replacement acres for each 1.0 acres permanently impacted. Based on a total of 10 acres for the project footprint (including any potential direct, indirect, temporary, secondary and cumulative impacts including the transmission/fiber optic line), mitigation would result in a purchase of 15.0 acres by SCA. This assumes that aside from the footprint of the project, temporary impacts would be minimal and vegetative restoration would be successful. At an estimated cost of \$5,000 per acre, total mitigation cost would be \$75,000.

**ATTACHMENT 1**  
**DISCUSSION OF SCA PROPOSAL/RATIONALE FOR**  
**PROCTER AND GAMBLE COGENERATION PROJECT MITIGATION**

**DETERMINING APPROPRIATE VALUE AND MITIGATION**

The proposed project is located within a 50-acre parcel in south Sacramento, and includes a connecting 1.2-mile transmission line corridor. "Waters of the United States" have been identified at the project site. However, according to separate biological surveys performed by Black and Veatch, Dames and Moore and Ebasco (aka Enserch), no vernal pools or threatened/endangered species are located on any portion of the 10-acre project site or the 5-acre construction laydown area. Although land to the west does contain what is characterized as "problem wetlands", this would not be negatively impacted by the project. "Depressions" which seasonally contain water are found on the project site. These depressions do not possess hydric soils, are not vegetated with a preponderance of wetland indicator plants, hence are not vernal pools and do not have federal jurisdictional status.

The U.S. Fish and Wildlife Service Mitigation Policy (Mitigation Policy) (Federal Register 46 [15]: 7644-7663, January 23, 1981) provides guidance for establishing appropriate mitigation for proposed projects impacting Waters of the United States. This Mitigation Policy is also acceptable to the California Department of Fish and Game when no special status species or wetland resources are found. Under the Mitigation Policy, resources are designated as one of four categories to assure that recommended compensation is consistent with the fish and wildlife values involved. The following resource categories cover a range of habitat values from those considered to be unique and irreplaceable to those believed to be of low value to fish and wildlife resources.

**Resource Category 1:** Habitat to be impacted is of high value and is unique and irreplaceable on a national basis or in the ecoregion section.

**Resource Category 2:** Habitat to be impacted is of high value and is relatively scarce or becoming scarce on a national basis or in the ecoregion section.

**Resource Category 3:** Habitat to be impacted is of high to medium value and is relatively abundant on a national basis.

**Resource Category 4:** Habitat to be impacted is of medium to low value.

For example, a project which would impact jurisdictional wetlands would be designated as Resource Category 1. Wetland habitat is of high value to migratory birds and is scarce regionally. When projects are proposed which impact waterways or wetlands, full mitigation is recommended for any fish and wildlife habitat value losses. The mitigation goal for this

type of habitat is no net loss of in-kind habitat value or acreage. Mitigation for this type of habitat may range from 1.5:1 to 2.3:1 in urbanized Sacramento (pers. comm. Art Champs ACOE, 1994). At least one "responsible agency"<sup>2</sup> recommends a mitigation of 2:1 for these types of habitats when no endangered plant species are present (California Native Plant Society, 1994).

The Resource Category of the SCA project site can be assessed considering several factors: 1) the urbanized character of the Procter and Gamble project area; 2) the industrial zoning designation by the City of Sacramento General Plan; 3) the lack of foraging and/or nesting habitat for many common animal and plant species; 4) the low diversity of plant and animal species found at the site; and 5) the required annual ground discing activities at the project site<sup>3</sup>.

Considering these factors, the project site is assessed as having low biological resource value, and is designated as resource category 4. This assessment is consistent with a recent evaluation of the Morrison Creek area performed by the U.S. Fish and Wildlife Service (USFWS, 1994).

The mitigation<sup>4</sup> goal for this resource category, as recommended by the U.S. Fish and Wildlife Service, is to "minimize the potential loss of habitat value" (Federal Register, 1981). Loss for this type of habitat is acceptable, although minimizing its loss is encouraged. SCA proposes to fully mitigate for potential biological resources above and beyond this stated mitigation goal.

#### POTENTIAL IMPACTS AND PROPOSED MITIGATION OF TRANSMISSION/FIBER OPTIC LINE

**Potential impacts** As detailed in the Application for Certification for the project, a transmission/fiber optic line will be built from the Procter and Gamble Cogeneration site to the existing Hurley-Hedge transmission line. This line will be about 1.2 miles in length, and will require between 9 to 12 steel poles, with spans from 600 to 800 feet. Potential impacts could result from vehicle operation and equipment construction activities.

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<sup>2</sup> California Environmental Quality Act (CEQA) defines "responsible agency" as a public agency which has discretionary approval power over a project.

<sup>3</sup> Historic records indicate that prior to the construction of the Procter and Gamble facility, the project area was an agricultural dry-farm operation.

<sup>4</sup> The United States Council of Environmental Quality regulations for implementing the National Environmental Policy Act define mitigation to include: 1) avoiding the impact; 2) minimizing the impact; 3) rectifying the impact; 4) reducing the impact over time; and 5) compensating for impacts. This definition of mitigation is consistent with federal and state wildlife agencies.

It has been estimated by CEC staff that 2 acres of potential biological resources could be negatively impacted as a result of the project.

**Proposed mitigation** SCA would avoid all potential wetland areas during construction of the transmission/fiber optic line. This would be accomplished by timing project construction to avoid the rainy portion of the year when wetlands and vernal pools are present. In addition, wetlands and vernal pools would be physically avoided during construction by locating transmission towers in non-sensitive areas.

SCA would mitigate for any actual disruption of the project area. This would be accomplished by biological surveys of the site. Accepted biological protocol would be followed to determine and evaluate the potential impacts before and after construction. SCA would be responsible for ensuring that measured pre-project conditions of the site (e.g., 75 percent of vegetative replacement) are attained within two years of construction. To supplement the assessment of the biologist, video recordings and still photographs would be made of the project area. It is believed by SCA staff that resolution offered by ground photography provides more useful information regarding any impacts which result from project construction. SCA would not perform before-and-after aerial surveys and photography of the site, however CEC staff may wish to perform their own surveys as an adjunct to SCA surveys and evaluations.

SCA would propose to provide mitigation for potential permanent impacts to resources in the area. If a portion of the 75 percent revegetation goal is not met (i.e. 0.5 acres was actually impacted, however only 50 percent vegetative growth was attained), SCA would remit a pro-rata sum in accordance with the biological assessment. Post project monitoring would be done for the 2-year period only.

#### POTENTIAL IMPACTS AND MITIGATION OF PROJECT SITE AND CONSTRUCTION LAYDOWN AREA

**Potential impacts** The net permanent and/or temporary biological impacts of a project is defined as the difference between the future with the project and the future without the project. If the future without the project cannot be reasonably predicted and documented, then the analysis should be based on the biological conditions that would be expected to exist over the life of the project, taking into consideration the natural species succession or implementation of approved restoration/improvement plans or conditions which currently exist in the project area.

For this project, predicting future events is not difficult. Aside from possible future energy projects, there are at this time no federal, state or local jurisdictions which would have biological regulatory authority over future development of the 10-acre project site and 5-acre area which will be used as a temporary construction laydown area for the project. The 5-acre parcel is not and will not be owned by SCA. Eventual development of the site is

imminent, as the entire parcel in which the project is located is designated and zoned for industrial uses in the City of Sacramento General Plan and Zoning Ordinance. Hence, its future as a sustainable biological resource for plants or animals is remote if not implausible.

The biological "carrying capacity" of the area is also a factor in determining mitigation for temporary impacts which could result from project construction. Since the area is urbanized and annually disced, it is inhabited by common animal species, which presently includes rabbit, meadowlark, quail and opossum, in very few numbers. Subsequently, the carrying capacity of the area is not and will not likely be maximized. The area's "ability" to function as habitat for these species with a temporary loss of about 12.5 percent of the total area<sup>5</sup> is not significant.

**Proposed mitigation** SCA would not propose to mitigate for potential temporary impacts of the construction laydown area. Compared to the entire parcel and considering the biological value of the area, the potential impacts to the construction laydown area are minimal. SCA would, however, propose to provide mitigation for direct project impacts by 1) restoration or 2) remuneration. Permanent direct impacts due to construction would be minimized by restoring the area (e.g. 75 percent of pre-project conditions) upon completion of the project. The following activities would be implemented to mitigate for potential impacts on the 5-acre site, and are consistent with recommendations by the U.S. Fish and Wildlife Service.

#### 1. Restoration

a. Design the project to avoid potential biological resources. The project construction laydown area is not located in any "problem wetland area" as defined by U.S. Army Corps of Engineers (1987 Wetlands Delineation Manual).

b. Locate the site at the least environmentally damaging site. The "problem wetlands" identified at the west side of the 50-acre study area, outside of the project site have been avoided.

c. Control potential water pollution through best management practices. Measures will be implemented to avoid ground water contamination or erosion from the construction laydown area to the westerly problem wetlands.

d. Regrade disturbed areas to contours which approximate original contours. This will ensure that drainage patterns to provide watershed to lower elevation areas are maintained.

e. Revegetate. In addition, SCA would revegetate the area with grasses found in the area. No follow-up monitoring would be proposed. Since the area is disced annually

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<sup>5</sup> 5 acres (laydown area) ÷ 40 acres (50 acres in parcel minus 10 acres of project area) = 12.5 percent.

and is not a part of the SCA property, the success of a long-term effort is questionable.

## 2. Remuneration

SCA would reserve the option to determine if the temporary construction laydown area could be successfully restored, or if it would be more economically feasible to provide remuneration. If SCA chose remuneration, funds for purchase of land would be provided to mitigate for impacts to potential biological resources.

Ultimately, SCA would either restore the area or provide remuneration, based on the impact(s) to 5-acre temporary construction laydown area. A decision as to which would be done would be made within 90 days of project construction completion.



## REFERENCES

California Native Plant Society, 1994. Policy and Guidelines on Vernal Pool Mitigation.  
Adopted March 5, 1994.

Personal Communication with Art Champs, Army Corps Of Engineers Regulatory Section,  
April 1994.

U.S. Fish and Wildlife Service, 1994. Planning Aid Report: South Sacramento County  
Streams Reconnaissance Investigation. Prepared for U.S. Army Corps of Engineers,  
Sacramento District.

United States Federal Register 46 (15): 7644-7663, January 23, 1981.