

# Sacramento Cogeneration Authority

P.O. Box 15830, Sacramento, CA 95852-0830

<b>DOCKET</b> <b>93-AFC-2</b>
DATE: <b>MAY 18 1994</b> <b>MAY 19 1994</b>
REC'D: 916/732-5218

Procter & Gamble Cogeneration Project

SCA 94-091

May 18, 1994

Mr. Darrel "H" Woo  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Attn: Docket Unit

**RESPONSE TO PROCTER & GAMBLE COGENERATION PROJECT PSA: PAGE 3 OF TRAFFIC COMMENTS DOCKETED 5/13/94 AND CORRESPONDENCE REGARDING EXTERIOR LIGHTING AT THE PROCTER AND GAMBLE MANUFACTURING FACILITY (DOCKET NO. 93 AFC 2).**

Dear Mr. Woo:

Please find enclosed page 3 of the traffic comments docketed on 5/13/94. The page was inadvertently left out of the docketed package. Also enclosed is the correspondence from SMUD and the response from Procter and Gamble regarding exterior lighting at the Procter and Gamble manufacturing facility.

Please call me if you have any comments.

Sincerely,

Diana Parker  
Environmental Specialist

Enclosures

cc: Rich Chapman, Black & Veatch  
Ron Simms, Walsh

**SACRAMENTO COGENERATION AUTHORITY  
PROCTER & GAMBLE COGENERATION PROJECT  
COMMENTS ON APRIL 15, 1994 PRELIMINARY STAFF ASSESSMENT**

**Traffic**

1. On page 354, the CEC analysis correctly points out that the AFC traffic analysis was performed under the assumption that the Army Depot redevelopment would be well underway by the start of project construction. Page 370 indicates that the traffic analysis in the AFC is based on the Army Depot reuse planning efforts projecting 15,000+ jobs, and that given the delays which often occur in the implementation of plans, it is likely that it will take a number of years for traffic associated with the Depot reuse to reach projected levels.

Based on developments concerning the Army Depot reuse and the downsizing of the Procter & Gamble facility which have occurred since the AFC was prepared, the SCA believes that the traffic levels will be significantly below those projected in the AFC and this should be emphasized in the CEC's analysis.

SCA believes that the CEC's inference that there may be a delay in Army Depot redevelopment should be changed to conclude that Army Depot is not now expected to maintain the reuse schedule anticipated when the AFC was prepared. This conclusion is justified by local news reports which have cast doubt about the rapidity of conversion. Likewise, the decrease in employment at the Procter & Gamble facility will represent a decrease in area traffic levels. The result of these two developments is that the general traffic conditions expected in the area should improve during the construction phase compared to those expected in the AFC.

2. An additional mitigation measure on page 372 (see third paragraph under Additional Mitigation), and a proposed condition of certification on page 374 (see TRANS-7) recommend that close coordination be maintained between the Procter & Gamble Cogeneration Project, the SMUDGAS pipeline, and the decommissioning of the Procter & Gamble manufacturing facilities identified for closure. While the SCA is willing to keep the CEC apprised of the Procter & Gamble Cogeneration Project and SMUDGAS Project schedules on a continuing basis, SCA is not able to dictate the decommissioning activities at the Procter & Gamble manufacturing facility because Procter & Gamble is a for profit business that is not subject to directives from SCA. Based on the autonomy of Procter & Gamble over their business operations, it is not appropriate for a condition of certification to be that SCA coordinate with Procter & Gamble concerning the timing of their decommissioning. Further, while SCA will endeavor to coordinate construction activities for the Procter & Gamble Cogeneration Project and SMUDGAS Project, it is likely that construction may occur concurrently. SCA recommends that TRANS-7 be revised as follows:

"The project owner shall obtain a schedule of the construction activities for the SMUDGAS pipeline along Fruitridge east of Power Inn Road so as to be aware of the timing of those activities. The project owner shall provide a copy of the cogeneration project's construction schedule and the SMUDGAS pipeline construction schedule to Procter & Gamble.

Verification: The project owner shall submit to the CEC CPM, at least 60 days prior to the start of construction, a copy of correspondence forwarded to Procter & Gamble regarding the cogeneration plant and SMUDGAS pipeline construction schedules."

3. Page 371 and TRANS-2 on page 373 of the PSA indicate that the Applicant will all the approvals associated with an encroachment permit for encroachment on local rights-of-way. Since encroachment permits are not expected to be required for the project, the transportation section of the AFC does not propose this as a mitigation measure. SCA recommends that the language in question and TRANS-2 be deleted.

4. Page 371 of the PSA correctly indicates that the 7:00-3:30 work schedule is the anticipated work schedule during project construction. However, SCA does not propose this as a mitigation measure because overtime, weather, or duration of the daylight may dictate a change in this schedule. The CEC should delete this item as a mitigation measure.

5. One of the CEC's proposed conditions of certification on page 373 of the PSA (TRANS-3) would require monthly surveys to ensure that a 2:1 v.o.r. is achieved. If a 2:1 v.o.r. is not achieved, the recommendation calls for a ride-sharing program initiated through a ride-share coordinator.

SCA proposes that the construction contractor will encourage carpooling among project workers through informational media such as bulletin boards and through information distributed to the workers. However, it will not be practicable to institute a ride-share program due to the transitory nature of the work force. Different trades, subcontractors, etc. will mobilize as various phases of the project proceed and then will demobilize and will be replaced by other trade workers. Average duration of employment will be a fraction of the total project duration. Given the constant shifting in the work force, monthly monitoring followed by a plan to encourage greater car pooling among monitored workers would be untimely and not practical as many workers monitored may no longer be working at the site. It is recommended that TRANS-3 be revised as follows:

"The project owner shall encourage project workers to carpool to and from the site by distributing a written notice to each worker employed at the site, at the first of each month, encouraging carpooling. Also, informational media will be displayed on the project bulletin boards to advertise and encourage carpooling.

Verification: The project owner, in its monthly compliance report, shall confirm carpooling notices have been provided to the workforce of record on the first of each month."

6. On page 374, of the PSA, TRANS-6 of the recommended conditions for certification requires the project owner to arrange that project traffic be directed to minimize use of certain intersections having a low LOS (Folsom Boulevard/Power Inn Road - a.m. peak period, and 83rd Street/Fruitridge Road - p.m. peak period) and a monthly report is to verify efforts to achieve this condition for certification. For legal liability reasons alone, SCA and the construction contractor find this requirement to be unacceptable. In essence, this provision would require SCA to incur an unacceptable degree of liability due to the legal recourse of a worker involved in an accident which occurred on a mandated worker commuter route. Further, based on the continually changing character of the workforce already discussed, it would not be practicable or useful to prepare monthly reports on traffic patterns. It would also be impractical and costly for the construction contractor or SCA to attempt to verify the results of the recommended condition of certification as this would require continuous traffic monitoring at the 83rd Street and Fruitridge intersection. Monitoring is not even possible at the Folsom Boulevard and Power Inn Road intersection as cars can not be followed visually to the site to verify project worker vehicle status.

There are numerous other reasons why exception is taken to this requirement. Based on a 7:00 to 3:30 work schedule, the a.m. project traffic is projected to flow through the Folsom Boulevard/Power Inn Road intersection prior to the a.m. peak hour which is from 7:30-8:30. Thus, no action would be required for this intersection. The p.m. peak at 83rd Street and Fruitridge Boulevard occurs from 3:30-4:30, the time during which shift changes at the Army Depot typically occur. Even if workers could be told to leave via 24th Avenue, this recommendation is questionable. First, 83rd Street is the minor street at the intersection and a decrease in LOS would be incurred by only a small portion of vehicles (those on 83rd Street) of which a significant portion would be project worker vehicles. Also, if workers exited via 24th Avenue then turned right on Fruitridge Boulevard, they would still be passing through the 83rd Street/Fruitridge intersection and would slow down the nonproject traffic trying to turn onto Fruitridge from 83rd Street which could defeat the purpose of rerouting project traffic in the first place. Finally, based on the traffic analysis approach agreed to by the CEC and the City of Sacramento, no LOS analysis was performed for the intersection of Fruitridge Boulevard and Florin Perkins Road and the existing LOS and the LOS impact of rerouting project traffic through this intersection is not known.

The apparent basis for TRANS-6 is found on the last paragraph on page 354. This paragraph correctly states that according to the City of Sacramento's criteria, the construction impacts are not significant for the intersections of 83rd Street/Fruitridge Boulevard and Power Inn Road/Folsom Boulevard (the reason that these are not significant is

because temporary construction impacts are not subject to the city's LOS significance criteria). The paragraph then goes on to state that "However, ..., CEC staff considers a decrease in LOS below local standards to be a significant transportation impact regardless of whether it occurs during construction or operation (underline added)."

The statement is based on the assumption that the project will decrease the LOS at these intersections below local standards. This is not true. Although a decrease in LOS does occur for three intersection movements during construction, construction impacts are not considered by the city and therefore local LOS standards are not violated. Therefore, the basis for the CEC's recommendation is unfounded.

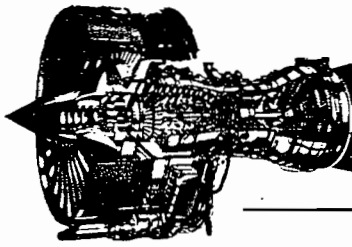
Based on the above discussion regarding TRANS-6, SCA recommends that TRANS-6 be revised as follows.

→ "The project owner shall arrange that A.M. and P.M. peak employee construction traffic occurs outside the peak hour to the extent practicable.

Verification: The project owner shall advise the CEC CPM, in its monthly construction reports, of the established normal working hours in effect during the month."

7. On page 371 of the PSA, the CEC states that the construction work schedule will call for a 7:00 a.m. to 3:30 p.m. workday. While the analysis was based on a 7:00 to 3:30 workday and this work schedule is anticipated by the construction contractor, extenuating circumstances such as weather conditions, availability of daylight, or overtime may necessitate a change in the work schedule temporarily during the project. In the event that a temporary deviation from these working hours is required, the impacts on local traffic levels should be acceptable based on the reduced area traffic caused by the delay in the Army Depot redevelopment and the Procter & Gamble restructuring.

8. On page 374 of the PSA, TRANS-5 indicates that construction truck deliveries should be limited to the period between 8:00 a.m. and 4:30 p.m. on weekdays. Although the AFC indicated that truck deliveries will occur between 8:00 a.m. and 4:30 p.m. on weekdays, SCA believes that, similar to the construction work schedule, extenuating circumstances may require deviations from the 8:00 a.m. to 4:30 p.m. time period. SCA believes that TRANS-5 should be revised to accommodate truck deliveries between 6:00 a.m. and 9:00 p.m., seven days a week. The impact of the project truck deliveries spread over a greater number of hours, particularly on the weekend, will be to lessen the peak hour impacts compared to those projected in the AFC.



**Sacramento  
Cogeneration  
Authority**

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

Procter & Gamble Cogeneration Project

SCA 94-059

April 29, 1994

Mr. Paul Helman  
Procter and Gamble Mfg. Co.  
P.O. Box 13220  
Sacramento, CA 95813

**PROCTER AND GAMBLE FACILITY EXTERIOR LIGHTING AND THE PROPOSED  
PROCTER AND GAMBLE COGENERATION PROJECT**

Dear Mr. Helman:

This letter is a follow-up to our telephone conversation earlier this week regarding a Preliminary Condition of Certification for the Procter and Gamble Cogeneration Project. Preliminary Condition of Certification Vis 5 requires SCA to work with Procter and Gamble to reduce cumulative lighting impacts in the vicinity by reducing the lighting on the P&G facilities to the minimum level required for safe operation and to redirect or shield remaining necessary lighting at the P&G facility to minimize visibility from public viewing areas and to minimize illumination in the vicinity and the nighttime sky (p. 312 of the enclosed PSA). Doug Norwood, of SMUD's Energy Efficiency staff, is available to meet with you to discuss the various SMUD energy efficiency programs for the Procter and Gamble facility. He can be reached at 732-6623.

SCA looks forward to Procter and Gamble responding to SCA regarding the lighting issues raised in the PSA. If you have any questions, please telephone me at 732-6703 or Diana Parker at 732-6540.

Sincerely,

John Larsen  
Manager, Project Development & Construction

Enclosure

cc: Rich Chapman, Black & Veatch  
Ron Simms, Walsh

# Procter & Gamble

The Procter & Gamble Manufacturing Company  
8201 Fruitridge Road  
Mailing Address:  
P.O. Box 13220  
Sacramento, California 95813

SMUD		
Procter & Gamble Project		
RECEIVED	5/6/94	
DISTRIBUTION	ACTION	SIGNOFF
PROJECT MANAGER		<i>J. Larsen</i>
ENVIRONMENTAL		<i>D. Parker</i>
COST/SCHEDULING		
ENGINEERING		<i>D. Thorge</i>
CONTRACT ADMIN.		<i>J. G. Gault</i>
		<i>S. Strachan</i>
		<i>C. Taylor</i>
		<i>B. Johnson</i>
		<i>J. J.</i>
FILE NO.	<i>Corp</i>	

May 3, 1994

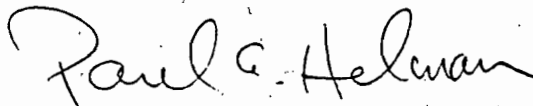
Mr. John Larsen  
SMUD  
P. O. Box 15830  
Sacramento, CA 95852-1830

Dear John:

In regards to a request to reduce the effect of equipment access and operational lights on the area that surrounds the Plant, I would suggest that there will be a significant reduction due to the announced consolidation of consumer businesses at the Sacramento site. Once shutdowns are complete (by the end of this year), the need for routine lighting will be minimal in the areas affected. It is anticipated that over half of the exposed higher level lights on the buildings will be unnecessary.

Please contact me if I can be of further service.

Sincerely,



Paul A. Helman, PE  
Utilities Department Manager

PAH:jl

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, Betty Lowry, declare that on May 19, 1994, I deposited copies of the attached SCA Response to Procter & Gamble Cogeneration Project PSA: Page 3 of Traffic comments docketed 5/13/94 and correspondence regarding exterior lighting at the Procter & Gamble manufacturing facility (Docket No. 93-AFC-2), 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  
SMUD  
P.O. Box 15830  
Sacramento, CA 95852-1830

**INTERESTED AGENCIES**

Richard Johnson  
Division Chief  
Sacramento Metro AQMD  
8411 Jackson Road  
Sacramento, CA 95826

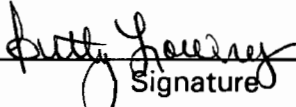
Ray Menebroker, Chief Project  
Assessment Branch  
Stationary Source Division  
California Air Resources Board  
P. O. Box 2815  
Sacramento, CA 95814

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