

# Memo



455 Capitol Mall, Suite 300  
Sacramento, CA 95814  
916.444.7301

**Date:** November 12, 2024  
**To:** Karl Ono, Fairfield-Suisun Sewer District  
**From:** Chris Mundhenk and Stephanie Rasmussen  
**Subject:** Review of Public Comments for the Suisun Force Main Reliability Project IS/MND

The following memorandum documents review of public comments received during the public review period for the Suisun Force Main Reliability Project IS/MND and provides written responses to those comments where necessary. Fairfield-Suisun Sewer District (FSSD) as lead agency under CEQA for the IS/MND will consider the comments and responses prior to consideration of the IS/MND for adoption. FSSD circulated the IS/MND to interested/responsible agencies and to the State Clearinghouse of the Governor’s Office of Planning and Research and the Solano County Clerk for a 30-day public review period from October 10, 2024 to November 8, 2024.

Three comment letters were received on the Draft IS/MND during the public review period from state agencies and Union Pacific Railroad Company. Table 1 includes a list of the commenters and the date on which their comments were received. A summary of comments received and responses to those comments are provided below, and copies of the comment letters are attached to this memorandum.

**Table 1 List of Commenters**

Commenter		Date Received
California Department of Fish and Wildlife Jordan Beaton, Environmental Scientist	<a href="#">Attachment #1</a>	October 25, 2024
Union Pacific Railroad Company Thomas Leddy, Manager II - Real Estate	<a href="#">Attachment #2</a>	November 5, 2024
California Department of Transportation Yunsheng Luo, Branch Chief, Local Development Review	<a href="#">Attachment #3</a>	November 6, 2024

## California Department of Fish and Wildlife

California Department of Fish and Wildlife (CDFW) noted that the mitigation measure for a frac-out plan included in the IS/MND would trigger the need for a Lake and Streambed Alteration Agreement (LSAA), consistent with the analysis and statements made in the IS/MND for the project. For example and on page 2-7 of the Final IS/MND, FSSD notes that an LSAA is anticipated for the project as a result of planned construction activities. Consistent with the statement made by CDFW, FSSD is committed to working with CDFW and obtaining an LSAA prior to the start of activities that could disturb the bed or bank of any waterway. No changes are necessary to analysis, mitigation measures, or conclusions of the IS/MND as a result of this comment.

## Union Pacific Railroad Company

Union Pacific Railroad Company (UPRR) provided additional information on how to file an application for a crossing and/or encroachment permit. Upon project approval, FSSD will coordinate with UPRR to obtain any necessary crossing or encroachment permits for construction work that may affect UPRR facilities. It should be noted that the potential need for a permit from UPRR is already noted in Section 2.5, "Project Approvals" on page 2-8 of the Final IS/MND. No changes are necessary to analysis, mitigation measures, or conclusions of the IS/MND as a result of this comment.

## California Department of Transportation

California Department of Transportation (Caltrans) provided several comments on the Draft IS/MND related to transportation, hydrology and water quality, biological resources, climate change, construction impacts, Americans with Disabilities Act (ADA) requirements, and potential permitting needs.

With respect to transportation, Caltrans noted that the vehicles miles traveled (VMT) analysis and significance determination provided in the IS/MND are undertaken in a manner consistent with the Office of Planning and Research's Technical Advisory, and Caltrans concurs with the IS/MND's finding that the project would have a less than significant VMT impact.

Regarding hydrology and water quality, Caltrans noted that plans and detail designs of the new force mains should be reviewed for potential drainage impacts prior to encroachment permit approval, and if the project would disturb soil with Caltrans right-of-way, a Storm Water Data Report and Stormwater Pollution Prevention Plan (SWPPP) would be required as part of the encroachment permit process and for compliance with National Pollutant Discharge Elimination System (NPDES) requirements. Compliance with the Construction General Permit as it relates to stormwater runoff and preparation of a SWPPP is acknowledged throughout the Final IS/MND (refer to pages 3-27, 3-37, and 3-43 for example). The need to acquire an encroachment permit from Caltrans is also acknowledged on page 2-8 of the Final IS/MND. No changes are necessary to analysis, mitigation measures, or conclusions of the IS/MND as a result of this comment.

With respect to biological resources, Caltrans provided recommendations related to nesting bird surveys and requested additional detail regarding temporary and permanent impacts to wetlands. The measures as presented in the IS/MND are considered appropriate and in accordance with industry standards as they relate to nesting season and preventing potential impacts related to disturbance of active nests that may occur along the proposed alignment. Further, FSSD intends to restore all project areas to pre-project conditions including wetlands and does not expect the project to have permanent impacts to wetlands. FSSD will coordinate with US Army Corps of Engineers (USACE) and the San Francisco Regional Water Quality Control Board (SFRWQCB) as required for work in or adjacent to waters of US and waters of the State and will mitigate for project impacts as required by USACE and SFRWQCB. No changes are necessary to analysis, mitigation measures, or conclusions of the IS/MND as a result of this comment.

Caltrans requested consideration of adaptation measures to address sea-level rise. However, the project involves the replacement of an existing pipeline to ensure reliability of sewer service. As such, adaptation measures related to climate adaptation are not considered applicable to the project but are more appropriately applied to more typical land use development (e.g., residential, commercial, and industrial development). No changes are necessary to analysis, mitigation measures, or conclusions of the IS/MND as a result of this comment.

Caltrans also commented on the types of permits and design requirements that may be required for the project. Following project approval, FSSD would coordinate with Caltrans to provide any necessary plans and reports and obtain any necessary permits applicable to the project for work affecting Caltrans facilities prior to beginning construction. In addition, no direct, permanent impacts to Caltrans facilities are anticipated, and as such, compliance with ADA requirements is not considered necessary. No changes are necessary to analysis, mitigation measures, or conclusions of the IS/MND as a result of this comment.

## Conclusion

Pursuant to State CEQA Guidelines Section 15074, all public comments received on the Public Draft IS/MND for the Suisun Force Main Reliability Project have been considered by FSSD. No substantive environmental issues raised during the public comment period constitute substantial new information that would warrant revisions to the IS/MND.

## Attachment #1

**From:** [Beaton, Jordan@Wildlife](mailto:Beaton, Jordan@Wildlife)  
**To:** [Karl Ono](#)  
**Cc:** [Day, Melanie@Wildlife](mailto:Day, Melanie@Wildlife); [stephanie.rasmussen@ascentenvironmental.com](mailto:stephanie.rasmussen@ascentenvironmental.com)  
**Subject:** SCH 2024100427  
**Date:** Friday, October 25, 2024 12:40:17 PM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Karl,

We would like to thank you for your thorough work on the Mitigated Negative Declaration (MND) for SCH 2024100427 Suisun Force Main Reliability Project!

On MND page 3-28 (pdf page 50), there are measures for a frac-out plan for the microtunneling component of this Project. We would like to remind the Lead Agency that microtunneling under a stream would require a Lake and Streambed Alteration Permit through CDFW.

Thank you,  
Jordan

**Jordan Beaton**

Environmental Scientist  
California Department of Fish and Wildlife Bay Delta Region (Region 3)  
2825 Cordelia Road, Suite 100  
Fairfield, CA 94534  
(707) 980-5172

## Attachment #2

**From:** [Thomas Leddy](#)  
**To:** [Karl Ono](#)  
**Subject:** RE: Env. Review - Solano County Project  
**Date:** Tuesday, November 5, 2024 6:34:56 AM

---

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Did you have an application number or project number for this request? If not, you would want to start the review process by completing an online application for the work. I have provided a link to our online application below.

[https://www.up.com/real\\_estate/utilities/index.htm](https://www.up.com/real_estate/utilities/index.htm)

Thank you!  
Thomas Leddy  
Manager II - Real Estate  
Union Pacific Railroad Company  
1400 Douglas Street, MS 1690 | Omaha, NE 68179  
tleddy@up.com

Utility Applications: [https://www.up.com/real\\_estate/utilities/index.htm](https://www.up.com/real_estate/utilities/index.htm)  
Link to Public Projects home page: <https://benesch.quickbase.com/db/bpqhu6hqy?a=dbpage&pageid=13>

-----Original Message-----

From: Anna Palmer <acpalmer@up.com>  
Sent: Monday, November 4, 2024 3:49 PM  
To: Thomas Leddy <tleddy@up.com>  
Subject: FW: Env. Review - Solano County Project

FYI

-----Original Message-----

From: Karl Ono <webmaster@up.com>  
Sent: Wednesday, October 9, 2024 1:19 PM  
To: Anna Palmer <acpalmer@up.com>  
Subject: Env. Review - Solano County Project

\* This message was sent on behalf of the sender \*

This message was submitted through the UP web site.

Subject: Env. Review - Solano County Project  
;  
Name: Karl Ono

**Attachment #2**

E-mail Address: kono@fairfieldsuisunsewer.ca.gov  
;  
Company: Fairfield-Suisun Sewer District Phone Number: (707) 428-9129  
;  
Hi Anna,

Please let me know if you're not the appropriate contact for this and, if not, who this notice should be sent to:

The Fairfield-Suisun Sewer District (FSSD) is releasing a Draft Initial Study and Proposed Mitigated Negative Declaration (IS/MND) on the proposed Suisun Force Main Reliability Project (project) for public review. The IS/MND has been prepared in accordance with the California Environmental Quality Act (CEQA) and State Revolving Fund requirements and is expanded beyond the typical content requirements of an initial study to include additional "CEQA-Plus" information.

Project Description and Location: FSSD is proposing to construct two new parallel force mains to operate in lieu of the existing Suisun Force Main to ensure service reliability. The existing force main would be inspected after the new parallel force mains are installed and either abandoned, repurposed, or rehabilitated as a separate project based on the inspection results. The project would also include installation of appurtenant infrastructure necessary for operation and maintenance of the force mains. The project alignment would extend between FSSD's Suisun Pump Station and Central Pump Station, paralleling the existing alignment where possible, but would follow a different alignment compared to the existing force main. The project alignment would extend west from the southern terminus of Civic Center Boulevard, then extend west along the northern border of Mike Day Park and Suisun Slough. Once reaching Main Street, the alignment would turn to the north and then travel under SR 12. The project alignment then turns west, crossing Main Street and the existing Union Pacific Railroad tracks to follow Ohio Street until it intersects with Madison Street, at which point the project alignment turns southward through Illinois Street and to FSSD's Central Pump Station property. Four additional alignment options are being considered for the segments of the force mains: Civic Center Boulevard to Driftwood Drive, then along the northern border of Suisun Slough (Alignment Option 1); along the western border of Mike Day Memorial Park (Alignment Option 2); Civic Center Boulevard to Lotz Way and west to Main Street (Alignment Option 3); or Webster Street from Ohio Street and then to Illinois Street before connecting to Madison Street (Alignment Option 4). Stormwater improvements would be located along Ohio Street between Jefferson Street and Union Avenue between the pipeline alignment and the Pacific Gas & Electric facility. The project is within the city limits of Fairfield and Suisun City in Solano County.

Public Review Period: The Draft IS/MND is being circulated for a 30-day public review period from October 10, 2024 through November 8, 2024. Written comments need to be submitted at the address or e-mail listed below by no later than 5:00 p.m. on November 8, 2024.

Karl Ono P.E., Senior Engineer  
Fairfield-Suisun Sewer District  
1010 Chadbourne Road  
Fairfield, CA 94534  
Phone: (707) 428-9129  
kono@FairfieldSuisunSewer.ca.gov

Thanks,  
Karl

;  
;

This message was sent at Wednesday, 10/09/2024 1:19:05 PM Central  
This message was generated from web site: www.up.com  
This message was sent from IP address: 50.232.154.226  
The user's browser is: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/129.0.0.0 Safari/537.36 [Mozilla Windows NT 10.0]  
This message was generated from: <https://www.uprr.com/>

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



November 6, 2024

SCH #: 2024100427  
GTS #: 04-SOL-2024-00391  
GTS ID: 34248  
Co/Rt/Pm: SOL/12/R4.639

Karl Ono, Senior Engineer  
Fairfield-Suisun Sewer District  
1010 Chadbourne Road  
Fairfield, CA 94534

### **Re: Suisun Force Main Reliability Project – Mitigated Negative Declaration (MND)**

Dear Karl Ono,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Suisun Force Main Reliability Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the October 2024 MND.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

#### **Project Understanding**

The proposed project is a replacement of the existing Suisun Force Main, with two new parallel force mains to ensure service reliability. The project would also include installation of infrastructure necessary for operation and maintenance of the force mains and stormwater improvements. A portion of the project crosses State Route (SR) 12.

#### **Travel Demand Analysis**

The project vehicles miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the MND, this project is found to have a less than significant VMT impact.

#### **Hydrology and Water Quality**

Plans and detail designs of the new force mains should be reviewed for potential drainage impacts prior to encroachment permit approval. Additionally, if the project

Karl Ono, Senior Engineer  
November 6, 2024  
Page 2

will disturb soil within Caltrans Right of Way (ROW), a Storm Water Data Report (SWDR) should be prepared pursuant to the encroachment permit process and in accordance with the guidelines in the Caltrans Project Planning and Design Guide (PPDG) (*link*). Furthermore, all water quality-related issues concerning Caltrans ROW should be addressed through a Stormwater Pollution Prevention Plan (SWPPP) and the implementation of construction site Best Management Practices (BMPs).

### **Biological Resources**

Pre-construction nesting bird surveys with a season end date of September 30th are recommended. Surveys are recommended no more than 72 hours before construction rather than 14 days before construction, as it is reasonable that a bird may begin nesting in the two weeks between survey and construction. A migratory bird nonbreeding period of October 1<sup>st</sup> - January 31<sup>st</sup> for vegetation and tree removal activities and a 300-foot buffer for other raptor nests are also recommended.

The project impacts to wetland fill are described as temporary. Please provide additional justification for this conclusion. The Section 401 and 404 permits will likely require compensatory mitigation and permanent fills should be described as permanent. Proposed erosion control and sediment control BMPs can be considered mitigation measures for this impact.

### **Climate Change**

Please ensure that Caltrans remains informed about the diverse climate stressors affecting this project location, as well as the ongoing development and implementation of adaptation and resilience initiatives. In light of SB 272 (2023), which requires local jurisdictions to adopt a regional adaptation plan, please consider how this project aligns with the broader subregional adaptation plan of the local municipality and the county level. Caltrans will be participating as part of the Solano Bay Resilience Technical Advisory Committee (TAC) Roundtable Meeting in which countywide projects can be better adapted to sea level rise (SLR) projects. Additionally, given the project's proximity to the delta shoreline, please confirm if adaptation measures have been considered for mid- or end-of-century SLR projections, using data from the Ocean Protection Council (OPC) or National Oceanic and Atmospheric Administration (NOAA). Rising water tables could be further impacted by storm surge, king tides, and groundwater rise, including the potential for saltwater intrusion. For any questions and concerns within District 4's geographical boundaries, please reach out to the Caltrans Bay Area Climate Change Planning Coordinators, Hunter Oatman-Stanford at [hunter.oatman-stanford@dot.ca.gov](mailto:hunter.oatman-stanford@dot.ca.gov) and Lucius Wu at [lucius.wu@dot.ca.gov](mailto:lucius.wu@dot.ca.gov).



### **Construction-Related Impacts**

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

### **Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

### **Encroachment Permit**

All work of the double forced main will need to be completed under a Caltrans Encroachment Permit. An encroachment policy exception may be need if the forced main is considered a high priority facility within access controlled right of way.

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement.

The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). Please note that the checklist TR-0416 is used to determine the appropriate Caltrans review process for encroachment projects. Your application package may be emailed to [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Lisel Ayon, Associate Transportation Planner, via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Karl Ono, Senior Engineer  
November 6, 2024  
Page 4

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng".

YUNSHENG LUO  
Branch Chief, Local Development Review  
Office of Regional and Community Planning

c: State Clearinghouse