Sacramento Municipal Utility District
Station H Substation Project

Draft Environmental Impact Report • March 2021
State Clearinghouse #2020110057

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Sacramento Municipal Utility District

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Draft Environmental Impact Report

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March 2021

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Acronyms and Abbreviations

AB	Assembly Bill
BACT	Best Available Control Technology
BMP	best management practices
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CCSP	Central City Specific Plan
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
CSS	City's combined sewer system
DAC	disadvantaged communities
Draft EIR	draft environmental impact report
EIR	Environmental Impact Report
EJ	environmental justice
FEMA	Federal Emergency Management Agency
GGRF	Greenhouse Gas Reduction Fund
GHG	Greenhouse gas
IS	Initial Study
MLD	most likely descendant
$MTCO_2e$	metric tons of carbon dioxide equivalent
NAHC	Native American Heritage Commission
NCIC	North Central Information Center
NOP	Notice of Preparation
NO_X	oxides of nitrogen
NRHP	National Register of Historic Places

OPR	Office of Planning and Research
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PRC	Public Resources Code
project	Station H Substation Project
ROG	reactive organic gases
RSP	Railyards Specific Plan
SB	Senate Bill
SF_6	Sulfur Hexafluoride
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SQIP	Stormwater Quality Improvement Plan
UAIC	United Auburn Indian Community of the Auburn Rancheria

Executive Summary

Introduction

This summary is provided in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. As stated in the State CEQA Guidelines Section 15123(a), "an environmental impact report (EIR) shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical." As required by the Guidelines, this section includes: (1) a summary description of the project; (2) a synopsis of environmental impacts and recommended mitigation measures; (3) identification of the alternatives evaluated and of the environmentally superior alternative; and (4) a discussion of the areas of controversy associated with the project.

Summary Description of the Project

The Sacramento Municipal Utility District (SMUD) is proposing the Station H Substation Project ("Station H Substation Project" or "project"). SMUD's goals for the project are to decommission and remove outdated Station A equipment that is currently present at the project site and replace the existing equipment within the outdoor area between the historic Station A building and the Mercy Housing Community to the east with new outdoor substation equipment.

Project Objectives

SMUD's objectives for the project include:

- provide safe and reliable electrical service to existing and proposed development in the downtown Sacramento area;
- meet SMUD's goals of ensuring electrical service reliability in the downtown Sacramento area by 2024;
- provide greater operational flexibility between circuits and substations in the area;
- maximize the use of available SMUD property and resources;
- minimize impacts to nearby sensitive receptors; and,
- minimize potential conflicts with existing planning efforts within the City of Sacramento.

Project Location

The project site is located at the northeast corner of H Street and 6th Street in downtown Sacramento. The project site is bordered by H Street to the south, 6th Street to the west, Government Alley to the north, and the Mercy Housing 7th & H Housing Community (Mercy Housing Community) to the east. The location of construction staging is not yet known but, for the purposes of this analysis, is assumed to be within one mile of the project site. Most of the project site is currently occupied by Station A equipment and the historic Station A building, which is a California Historical Landmark, and eligible for listing in the National Register of Historic Places.

The project is located in a highly developed area of downtown Sacramento. Sacramento County municipal buildings near the project site include the Sheriff's Department, Recorder's Office, Department of Technology, courthouse, jail, Administration Center, and two parking garages. The Mercy Housing Community is directly adjacent to the eastern edge of the project site. The Mercy Housing Community includes retail and clinic space on the ground floor with 150 residential units spread across seven stories. The Mercy Housing Community also includes two large landscaped terraces on the second floor. SMUD's Station G substation is currently under construction directly north of the project site across Government Alley and is within the boundary of the Railyards Specific Plan (RSP) area. The privately-owned Hall of Justice Building is across the street to the south and the U.S. District Court is across the street to the southwest. The historic Rail Depot and Sacramento Intermodal Transportation Facility are located approximately 800 feet to the west.

Project Characteristics

With the City of Sacramento's continued implementation of both the Central City Specific Plan (CCSP) and the RSP Environmental Impact Report (EIR), maintaining SMUD's ability to provide safe and reliable electrical service within the downtown and the surrounding area is essential. The project involves the decommissioning and removal of outdated Station A equipment that is currently present at the project site within the outdoor area between the historic Station A building and the Mercy Housing Community to the east and constructing new outdoor substation equipment.

As part of the decommissioning of Station A, SMUD would remove and dismantle existing substation equipment, including protection and control equipment within the historic Station A building and transformers and switchgear within the outdoor switchyard. Decommissioning activities would also include the removal of oil pump equipment from within the historic Station A building. Equipment from inside the historic Station A building would be removed through existing doorways and no modifications to the structure would occur. Some equipment may need to be dismantled prior to removal. Additionally, two existing underground 115 kV lines located within the Government Alley to the north of the site would be abandoned in place.

Once equipment associated with Station A has been decommissioned and the existing yard has been cleared, new equipment would be assembled and installed on site. The proposed substation would include two 115 kV underground transmission lines, two 115/21 kV transformers, and a metal building structure consisting of a total of nine 21 kV circuit breakers. Station H would tie into the new Station G (currently under construction) via two new 115 kV lines to be located within Government Alley, immediately north of the project site. The proposed electrical equipment to be located on site is anticipated to be no taller than existing Station A equipment currently located at the site, which is approximately 30 feet tall.

As part of the project, SMUD may use limited amounts of Sulfur Hexafluoride (SF_6), a common insulating gas for high-voltage electrical systems, at the project site. Use of the proposed switchgear equipment would comply with recordkeeping, reporting, and leakage emission limit requirements in accordance with California Air Resources Board regulations for reduction of SF_6 emissions. As part of substation operations and maintenance activities, SMUD would monitor existing substation equipment to accurately and immediately identify any SF_6 leaks and immediately repair leaks that are discovered. SMUD is also an active member of the SF_6 Emission Reduction Partnership, which focuses on reducing emissions of SF_6 from transmission and distribution sources.

A canopy structure is proposed to be located between the new Station H substation yard and the historic Station A building. The canopy would be approximately the same height as the existing equipment in the outdoor area with a maximum height expected to be approximately 30 feet in height at its tallest point. The canopy roof would be angled and is designed to shield the control building in the event that bricks fall from the exterior of the Station A building. Prior to the decommissioning of Station A, the structural integrity of the historic Station A building would be evaluated to determine whether upgrades would be required to prevent damage to new substation equipment. Should the study determine that the structural failure of the Station A building would not occur or upgrades could be completed that would ensure structural integrity, the canopy may not be needed.

Operation and access of the new substation generally would be similar to the existing Station A substation yard. Maintenance workers and other SMUD employees would periodically access the site through Government Alley. The historic Station A building would remain unoccupied; however, SMUD personnel would visit the building periodically to conduct routine checks and maintenance, and the Station A building would be used for storage.

Potential Approvals and Permits Required

Elements of the project could be subject to permitting and/or approval authority of other agencies. As the lead agency pursuant to CEQA, SMUD is responsible for considering the adequacy of the CEQA documentation and determining if the project should be approved. Other potential permits required from other agencies could include:

State

- **California Department of Transportation**: Permits for movement of oversized or excessive loads on State Highways.

Local

- **Sacramento Metropolitan Air Quality Management District (SMAQMD)**: Authority to Construct/Permit to Operate pursuant to SMAQMD Regulation 2 (Rule 201 et seq.).

City of Sacramento:

- Tree removal permit—to comply with the City of Sacramento Tree Ordinance
- Transmission Facilities Permit – to comply with Sacramento City Code requirements
- Encroachment permit
- Improvement Plans
- Design Review

Environmental Impacts and Recommended Mitigation Measures

Project Specific Impacts

This EIR has been prepared pursuant to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 1500, et seq.) to evaluate the physical environmental effects of the proposed Station H Substation Project. SMUD is the lead agency for the project. SMUD has the principal responsibility for approving and carrying out the project and for ensuring that the requirements of CEQA have been met. After the Final EIR is prepared and the EIR public-review process is complete, the SMUD Board of Directors is the party responsible for certifying that the EIR adequately evaluates the impacts of the project.

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts for the Station H Substation Project that are evaluated in this Draft EIR. The table provides the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures. Note that this table does not include the impacts and mitigation measures included in the Initial Study (IS) (see Appendix B).

Significant-and-Unavoidable Impacts and Cumulative Impacts

The project would result in significant and unavoidable impacts to Tribal cultural resources. Results of the NCIC records search and consultation with Wilton Rancheria, United Auburn Indian Community, Ione Band of Miwok, and Shingle Springs Band of

Miwok Indians have identified two Tribal cultural resources (P-24-5225 and P-34-2359) as described under AB 52. P-34-2359 has also been identified as an indigenous archaeological resource. Because project-related ground-disturbing activities could result in damage to Tribal cultural resources, this would be a potentially significant impact. Implementation of Mitigation Measures 3.1-1a, 3.1-1b, and 3.1-1c would reduce impacts associated with the project, but not to a less-than-significant level because the possibility remains that excavation activities might not be able to avoid significant Tribal cultural resources.

Summary of Alternatives

Alternatives evaluated in this Draft EIR are:

- **Alternative A (No Project)**, which assumes no new substation equipment would be installed and that the existing equipment would continue to be used until it is no longer considered viable and then likely decommissioned and removed; and
- **Alternative B (Site Reorientation)**, which assumes the project would be reoriented to maximize the distance between the known Tribal cultural resources to the south and on-site ground disturbance; and,
- **Alternative C (Off-Site Alternative)**, which assumes that a new substation would be constructed in an area generally north of Station G.

The following summary provides brief descriptions of the alternatives. For a more thorough discussion of project alternatives, see Chapter 6, “Alternatives.”

Alternative A (No Project)

Under this alternative, no new substation equipment would be installed within the yard of the former Station A. It is assumed that the existing equipment would continue to be used until it is no longer considered viable and then likely decommissioned and removed. Under this alternative, SMUD would not be able to provide reliable electrical supplies to the anticipated level of development within the downtown Sacramento area.

Alternative B (Re-orientation of on-site facilities)

Under this alternative, on-site uses would be reoriented to maximize the distance between the known Tribal cultural resource and on-site ground disturbance. This would involve the removal of existing equipment and abandonment in place of any subsurface equipment associated with Station A that is present within 35 feet of the southern boundary of the project site. Where feasible, any equipment to be placed within this area would be installed on concrete pads to minimize ground disturbance . Where feasible, all necessary subsurface utilities would also be routed north from the project site and then westward along Government Alley. This alternative would not remove any existing or otherwise

planned subsurface utilities, including those associated with Station G, that extend through the eastern portion of the project site.

Alternative C (Off-site Alternative)

Under this alternative, a new substation would be constructed at an off-site location generally north of Station G and south of the Union Pacific Railroad (UPRR) tracks. This analysis assumes an off-site location would be generally located north of Station G based on current development (i.e., currently undeveloped or under-utilized land). In addition, because of the challenges associated with routing substation lines under the UPRR tracks, it is further assumed that any off-site alternative location would need to be located south of the UPRR tracks. Based on these locational constraints development of a substation would impact the planning and approved development that is underway or has currently been completed on these parcels within this area. Obtaining approvals for the substation would be very difficult with this alternative. Given the feasibility considerations associated with off-site locations (e.g., cost increases and logistical challenges due to proximity to connecting infrastructure) that would come with locating the substation more distant to the service area and the required transmission infrastructure, this analysis focuses on a potential site that represents the nearest feasible off-site location as it would represent the least increase in impacts related to construction length and disturbance area. This is considered to be consistent with CEQA Guidelines Section 15126.6 and the intent/purpose of alternatives within an EIR. As potential off-site locations get farther away from the existing connections near Station G and H Street, there would be greater environmental effects from the increased construction.

Environmentally Superior Alternative

CCR Section 15126.6 suggests that an EIR should identify the “environmentally superior” alternative. “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As shown in Summary of Project Impacts, Impact 3.1-1 (Change the significance of a Tribal cultural resources) and Impact 3.1-2 (Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to Tribal cultural resources) would be significant and unavoidable. Feasible mitigation is available for all other potentially significant impacts associated with project implementation.

When considering objectives, the proposed project would best meet the project objectives, as stated in Chapter 2, “Project Description.” In contrast, Alternative B would not minimize impacts on nearby sensitive receptors, nor would it maximize the use of available SMUD resources and property to the extent of the project. Similarly, Alternative C, by relocating a substation needed for SMUD to provide reliable and safe electrical service in the area, would limit SMUD’s operational flexibility by locating this substation at a greater distance from Station G, which is currently under construction. Furthermore, while it would be expected to reduce impacts to the known resources along H Street, the

site is located within an archaeologically sensitive area and could result in impacts to previously unknown Tribal cultural resources.

Consistent with State CEQA Guidelines (CCR Section 15126.6 [e][2]), because the environmentally superior alternative was identified as the No Project Alternative, another environmentally superior alternative shall be identified. Based on the environmental analysis contained in this Draft EIR, Alternative B would result in lesser impacts compared to the project. However, and as noted above, Alternative B could still result in significant and unavoidable impacts on archaeological, historical, and Tribal cultural resources. Therefore, the environmental impact differences between the project and Alternative B are not substantial enough that one is clearly superior over the other.

Areas of Controversy

In accordance with Public Resources Code Section 21092 and CCR Section 15082, SMUD issued a notice of preparation (NOP) on November 4, 2020, to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document (Appendix A). SMUD accepted comments on the scope of the EIR between November 4 and December 8, 2020. A noticed virtual scoping meeting for the EIR occurred on November 16, 2020.

Based on the comments received during the NOP comment period, the major areas of controversy associated with the project include:

- potential impacts to Archaeological, Historical, and Tribal Cultural Resources;
- need for AB 52 and SB 18 compliance; and,
- need for a drainage study.

Areas of controversy that fall within the scope of CEQA are addressed in this Draft EIR and its appendices. Issues that fall outside the scope of CEQA are not evaluated in this Draft EIR; however, SMUD will continue to respond to these issues through the project planning process.

All of the substantive environmental issues raised in the NOP comment letters have been addressed or otherwise considered during preparation of this Draft EIR.

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
3.1 Tribal Cultural Resources			
Impact 3.1-1: Cause a substantial adverse change in the significance of a Tribal cultural resource, including human remains. The NCIC records search and consultation with Wilton Rancheria, UAIC, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians identified two Tribal cultural resources (P-24-5225 and P-34-2359) as described under AB 52. Because project-related ground-disturbing activities could result in damage to Tribal cultural resources, the project could cause a potentially significant impact.	PS	**Mitigation Measure 3.1-1a: Prepare and implement a treatment plan.** Before ground disturbance associated with the project, SMUD shall, in cooperation with UAIC, Wilton Rancheria, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, finalize a treatment plan specific to the site. The treatment plan shall include, but is not limited to: • testing, • excavation strategy, • research design, • Tribal monitoring, • resource significance assessment methods, • discovery, preservation, and evaluation methods, • a burial treatment agreement, • reporting requirements, and • health and safety procedures. The testing portion of the treatment plan shall be implemented once Station A has been safely decommissioned; if resources are discovered during testing, the treatment plan would continue to be implemented throughout ground disturbing activities on the project site. **Mitigation Measure 3.1-1b: Prepare and implement worker cultural resources awareness and respect training program.** A cultural resources respect training program will be provided to all construction personnel active on the project site prior to implementation of earth moving activities. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the cultural resources awareness and respect training program in coordination with a qualified archaeologist meeting the United States	SU

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Secretary of Interior guidelines for professional archaeologists. The program will include relevant information regarding sensitive Tribal cultural resources, including protocols for resource avoidance, applicable laws regulations, and the consequences of violating them. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any find of significance to Native Americans and protocols, consistent, to the extent feasible, with Native American Tribal values. **Mitigation Measure 3.1-1c: Memorialize the Tribal cultural values of the project area through public education and awareness.** To acknowledge the importance of the project area, particularly the area surrounding *Wanoho Pakan,* to California Native American Tribes, SMUD shall implement the following additional measures, regardless of whether Tribal cultural deposits related to P-34-2359 are encountered during project implementation: 1. In coordination with UAIC, Wilton Rancheria, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, SMUD shall develop a program with the American River College Native American Resource Center to benefit Native American students by enhancing areas of need or potential and shall support the program with a financial contribution. The contribution shall begin in 2021 and span a 3-year period. The program and contribution will be developed with the American River College Native American Resource Center. 2. In coordination with UAIC, Wilton Rancheria, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, SMUD shall commission a piece of art or other appropriate monumentation to represent the Tribal	

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		cultural values of the project area. The art piece could be in the form of a mural, sculpture, informative plaque, or other representation agreed to by the Tribes.	
Impact 3.1-2: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to Tribal cultural resources including human remains. The Station H Substation project, in combination with other cumulative development in the area, could result in impacts to Tribal cultural resources in the area. Even with the implementation of project-specific mitigation measures, the potential remains for indigenous archaeological and tribal cultural resources to be damaged, and as a result, the project's potential contribution would remain cumulative considerable. Potential impacts would be significant.	S	No additional feasible mitigation is available to reduce the project's potential contribution to less than cumulatively considerable.	SU
3.2 Cultural Resources			
Impact 3.2-1: Change in the significance of a historical resource. The Station A building has been identified as a historical resource. The project could include possible structural stabilization upgrades to the building. Additionally, construction-related groundborne vibration could result in damage to the buildings. Therefore, there would be a potentially significant impact on the historical resource.	PS	**Mitigation Measure 3.2-1a: Limit ground vibration during construction.** Implement Mitigation Measures 3.13-a: Implement measures to reduce ground vibration; and Mitigation Measure 3.13-b: Develop and implement a vibration control plan. **Mitigation Measure 3.2-1b: Comply with the Secretary of the Interior's Standards.** • For all interior repairs to the Station A building that do not alter the external visual appearance of the building, review by an architectural historian is not required. • For minor exterior repairs to the Station A building that do not alter the visual appearance of the building—such as tuck pointing—if the repairs are conducted in compliance with the Secretary's Standards and consistent with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with	LTS

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995), then review by an architectural historian is not required. • For larger exterior repairs to the Station A building—such as external sheer walls—repairs shall be conducted in compliance with the Secretary's Standards and consistent with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995), and an architectural historian shall be retained to confirm that the repairs do not result in a change to the design of the Station A building such that the building would no longer qualify as a historical resource.	
Impact 3.2-2: Change the significance of a historic-period archaeological resource. Results of the records search for the project site did not indicate any known historic-period archaeological sites or materials. However, project-related ground-disturbing activities could result in the discovery or damage of undiscovered historic-period archaeological resources. This would be a potentially significant impact.	PS	**Mitigation Measure 3.2-2: Halt ground-disturbing activity upon discovery of historic-period archaeological features.** In the event that a historic-period archaeological site (such as concentrated deposits of bottles or bricks with makers marks, amethyst glass, or other historic refuse) is uncovered during grading or other construction activities, all ground-disturbing activity within 100 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. SMUD will be notified of the potential find and a qualified archeologist shall be retained to investigate its significance. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the find is	LTS

NI = No impact B = Beneficial LTS = Less than significant PS = Potential significant S = Significant SU = Significant and unavoidable

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either a historical resource or a unique archaeological resource), the archaeologist shall work with SMUD to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If artifacts are recovered from significant historic-period archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results.	
Impact 3.2-3: Change the significance of a prehistoric archaeological resource. Results of the NCIC records search identified P-34-2359 as a prehistoric archaeological resource. Because project-related ground-disturbing activities could result in damage to this resource, this would be a potentially significant impact.	PS	**Mitigation Measure 3.2-3: Identify and protect prehistoric archaeological resources.** Implement Mitigation Measures 3.1-3a: Prepare and implement a treatment plan; and Mitigation Measure 3.1-3b: Prepare and implement worker cultural resources awareness and respect training program.	LTS
Impact 3.2-4: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to cultural resources. The Station H Substation project, in combination with other cumulative development in the area, could result in impacts to cultural resources in the area. Through the implementation of project-specific mitigation measures, the contribution of the project would not be cumulatively considerable with respect to historical resources and archaeological resources. Potential impacts would be significant.	PS	See Mitigation Measures 3.2-1a, 3.2-1b, 3.2-2, and 3.2-3. No additional mitigation is required.	LTS

NI = No impact B = Beneficial LTS = Less than significant PS = Potential significant S = Significant SU = Significant and unavoidable

1 Introduction

This draft environmental impact report (Draft EIR) evaluates the potential environmental impacts of the proposed Sacramento Municipal Utility District (SMUD) Station H Substation Project ("Station H Substation Project" or "project"). This Draft EIR has been prepared under the direction of SMUD in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000-21177) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000-15387) ("CEQA Guidelines"). SMUD is the lead agency under CEQA for consideration of this EIR and potential project approval.

1.1 Purpose and Intended Uses of this EIR

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects PRC Section 21000 *et seq*.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the SMUD Board of Directors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002, CCR Section 15093).

According to CCR Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

Because it will carry out the project, SMUD is the lead agency, as defined by CEQA, for this EIR. Other public agencies with jurisdiction over the project are listed below in Section 1.3, "Agency Roles and Responsibilities."

1.2 Scope of the Draft EIR

This EIR is characterized as a focused EIR prepared pursuant to Section 15168 of the State CEQA Guidelines. It is intended to be an analytical superstructure for subsequent analyses associated with individual project applications. This EIR describes the existing conditions

of the project site, analyzes the potential environmental impacts of the project, and identifies mitigation measures where necessary and available to avoid or reduce the magnitude of potentially significant impacts of the project.

Pursuant to CEQA and the State CEQA Guidelines, a lead agency shall focus an EIR's discussion on significant environmental effects and may limit discussion on other effects to brief explanations about why they are not significant (PRC Section 21002.1, CCR Section 15143). A determination of which impacts would be potentially significant was made for this project based on comments received as part of the public scoping process (Appendix A) and review of the information presented in the Initial Study (IS) prepared for the project (Appendix B), as well as additional research and analysis of relevant project data during preparation of this Draft EIR. SMUD has determined that the project has the potential to result in significant environmental impacts on Tribal cultural resources and cultural resources, which are addressed in detail in this Draft EIR.

1.2.1 Effects Found Not to be Significant

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CCR Sections 15126.2[a] and 15128). Effects dismissed in an IS as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the lead agency subsequently receives information inconsistent with the finding in the IS (CCR Section 15143).

Based on comments received as part of the public scoping process (Appendix A) and a review of the information presented in the IS prepared for the project (Appendix B), as well as additional research and analysis of relevant project data during preparation of this Draft EIR, the following were identified as resources that would not experience any significant environmental impacts from the project.

- Aesthetics
- Agriculture and Forest Resources
- Air Quality
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise and Vibration
- Population and Housing
- Public Services
- Recreation
- Transportation and Circulation
- Utilities and Service Systems
- Wildfire

Chapter 3, "Existing Environmental Setting, Impacts, and Mitigation" includes additional justification and explanation, as required by CEQA, as to why significant impacts to each of the aforementioned resources are not anticipated.

1.3 Agency Roles and Responsibilities

This Draft EIR will be used by SMUD and CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state and local agencies, which may have an interest in resources that could be affected by the project, or that have jurisdiction over portions of the project.

As the lead agency pursuant to CEQA, SMUD is responsible for considering the adequacy of the EIR and determining if the project should be approved.

Under CEQA, a responsible agency is a public agency, other than the lead agency, that has responsibility to carry out or approve a project (PRC Section 21069). A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California (PRC Section 21070).

The following agencies may serve as responsible and trustee agencies for the project:

State

- California Department of Transportation, District 3
- California State Office of Historic Preservation
- State Water Resources Control Board/Central Valley Regional Water Quality Control Board

Local

- City of Sacramento
- Sacramento Metropolitan Air Quality Management District

1.4 CEQA Public Review Process

1.4.1 Notice of Preparation

The purpose of a Notice of Preparation (NOP) is to provide sufficient information about the project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (CCR Section 15082[b]). Comments submitted in response to the NOP are used by the lead agency to identify broad topics to be addressed in the EIR.

In accordance with PRC Section 21092 and CCR Section 15082, SMUD issued an NOP on November 4, 2020 to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document (Appendix A). The NOP was submitted to the State Clearinghouse, which then distributed the NOP

to potential responsible and trustee agencies; posted on SMUD's website (https://www.smud.org/stationh); posted with the Sacramento County Clerk; and made available at SMUD's offices. In addition, the NOP was distributed directly to property owners within 500 feet of the project site, interested Native American Tribes, and the Sacramento Metropolitan Air Quality Management District (which has requested to be notified of SMUD's projects). Finally, notice was published in the *Sacramento Bee* on Thursday, November 12, 2020. The NOP was circulated for a 30-day review period, with comments accepted through December 8, 2020.

In accordance with CCR Section 15082(c), a noticed virtual scoping meeting for the EIR occurred on November 16, 2020.

Comments on environmental issues received during the NOP public comment period are considered and addressed in this Draft EIR. Appendix A contains the comment letters submitted during the NOP public comment period. A summary of the comments received by SMUD related to the NOP is as follows.

Table 1-1 Comment Letters and Discussion Location in Draft EIR

NOP Comment Letter	Comment/Topic	Addressed in Draft EIR Section
Letter 1 Native American Heritage Commission	*Tribal Cultural Resources* - Requests AB 52 and SB 18 compliance.	Section 3.1, Tribal Cultural Resources
Letter 2 Sacramento Fire Department	No comment.	Not applicable.
Letter 3 Derrick Lim	*Cultural Resources* - Expressed concern related to possible cultural resources near the historic China Lake.	Section 3.2, Cultural Resources
Letter 4 City of Sacramento	A drainage study will be required per the Design and Procedures Manual and Onsite Design Manual, with required flood mitigation specified in these manuals.	Not applicable. City requirements related to hydrology and water quality were addressed in the IS circulated with the NOP.
Letter 5 SMAQMD	No comment.	Not applicable.

1.4.2 Initial Study

An IS was prepared for the project to determine the scope of the Draft EIR, and is included as Appendix B.

1.4.3 Public Review of this Draft EIR

This Draft EIR is being circulated for a 45-day period of review and comment by the public and other interested parties, agencies, and organizations. A public meeting will be held on April 8, 2021 at 6:00 p.m. to receive input from agencies and the public on the Draft EIR. Copies of the Draft EIR are available online at https://www.smud.org/stationh and hardcopies at the following locations for review:

Sacramento Municipal Utility District
Customer Service Center
6301 S Street
Sacramento, CA 95817

Sacramento Municipal Utility District
East Campus Operations Center
4401 Bradshaw Road
Sacramento, CA 95827

During the public comment period, written comments from the public as well as organizations and agencies on the Draft EIR's accuracy and completeness may be submitted to SMUD. Written comments (including via email) must be received by 5:00 p.m. on April 30, 2021. Written comments should be addressed to:

SMUD–Environmental Services
P.O. Box 15830 MS B209
Sacramento, CA 95852-1830
Attn: Rob Ferrera

Email comments may be addressed to rob.ferrera@smud.org.

1.4.4 Final EIR

After the end of the public comment period, responses to comments on environmental issues will be prepared. Consistent with CCR Section 15088(b), commenting agencies will be provided a minimum of 10 days to review the proposed responses to their comments before any action is taken on the Final EIR or project. The Final EIR (containing this Draft EIR and the Responses to Comments document) will then be considered for certifications and approval by SMUD's Board of Directors. If the Board finds that the Final EIR is "adequate and complete," the Board may certify the Final EIR in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

1. The EIR shows a good faith effort at full disclosure of environmental information; and

2. The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project with consideration given to its environmental impacts.

The level of detail contained throughout this EIR is consistent with CCR Section 15151 of the CEQA Guidelines and recent court decisions, which provide the standard of adequacy on which this document is based. The Guidelines states as follows:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

CEQA requires that when a public agency makes findings based on an EIR, the public agency must adopt a reporting or monitoring program for those measures it has adopted or made a condition of the project approval to mitigate significant adverse effects on the environment. The reporting or monitoring program must be designed to ensure compliance during project implementation.

1.5 Organization of the Draft EIR

The organization of this Draft EIR is as follows:

- **Executive Summary** – This chapter introduces the proposed Station H Substation Project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant environmental impacts and mitigation measures to reduce significant impacts to a less-than-significant level.

- **Chapter 1: Introduction** – This chapter describes the purpose, proposed project, process, scope, and comments of this EIR. This chapter also gives a brief outline of this document's organization.

- **Chapter 2: Project Description** – This chapter goes into more detail on what the proposed project would entail as well as a description of the location, background, objectives, and characteristics of the project.

- **Chapter 3: Existing Environmental Setting, Impacts, and Mitigation** – This chapter provides a summary of the environmental analysis provided in the IS (Appendix B), as well as any mitigation measures identified in that document. In addition, this chapter provides further analysis of potential impacts to Tribal cultural resources and cultural resources, including presentation of applicable thresholds of significance, environmental impacts, policy considerations related to the environmental issue area being analyzed, and mitigation measures capable of avoiding or reducing the magnitude of otherwise significant impacts. This chapter also discusses the potential cumulative impacts that would result from implementation of the project together with other past, present and probable future projects and including whether the project's incremental increase to an already significant impact is cumulatively considerable.

- **Chapter 4: Other CEQA Sections** – As required under CEQA, this chapter provides additional analysis of environmental effects that could result from implementation of the proposed project, including effects found not to be significant, growth-inducing impacts, significant irreversible changes to the environment, and significant and unavoidable impacts. This section also provides an evaluation of environmental-justice-related issues that pertain to the project.

- **Chapter 5: Alternatives** – This chapter presents and analyzes a reasonable range of feasible alternatives to the proposed project.

- **Chapter 6: EIR Authors and Persons Consulted** – This chapter identifies all individuals responsible for the preparation of this EIR.

- **Chapter 7: References** – Lists the sources of information cited throughout this EIR.

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2 Project Description

2.1 Introduction

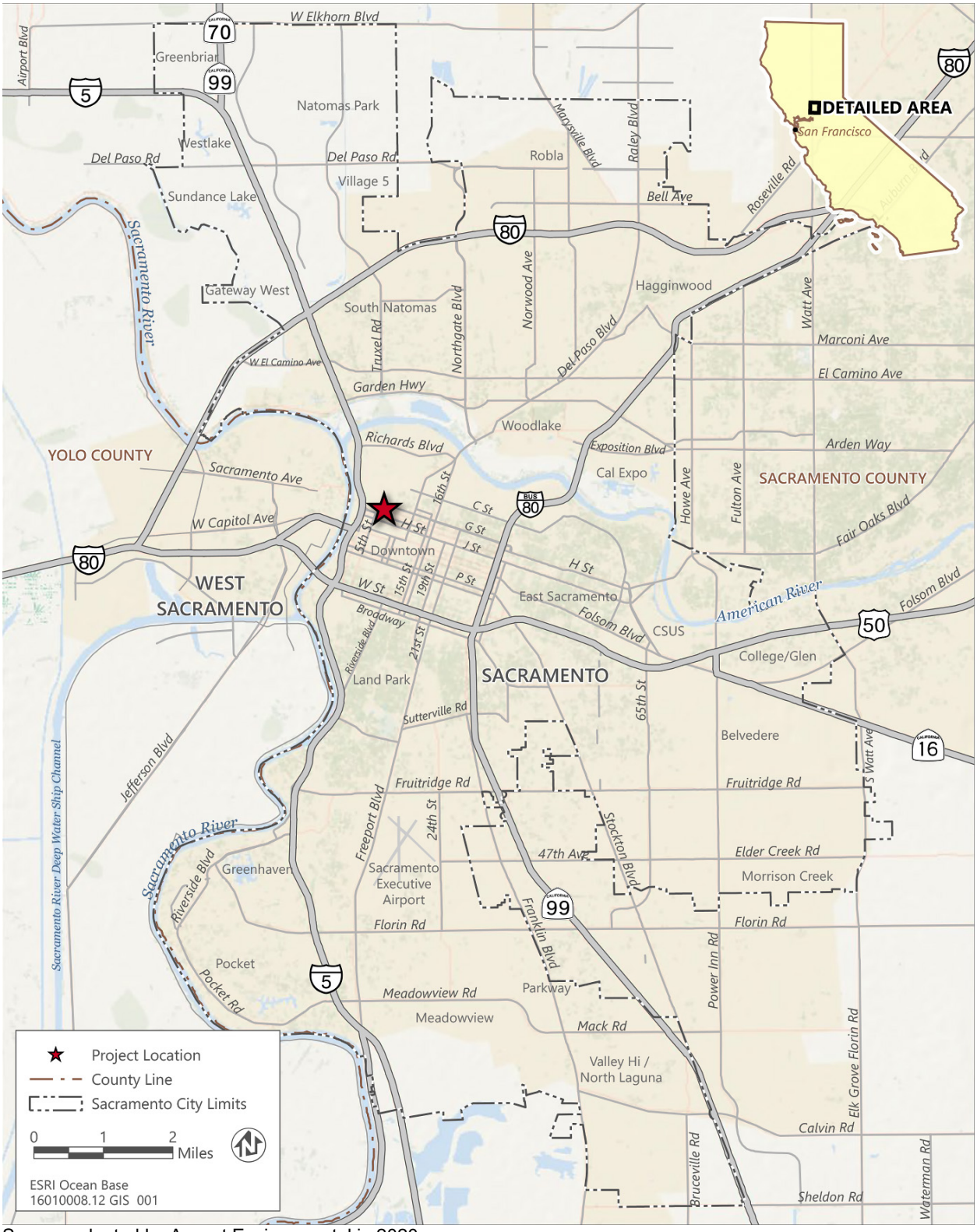
This chapter presents a detailed description of the Sacramento Municipal Utility District (SMUD) Station H Substation Project (project) located in Sacramento, California. It is SMUD's goal for the project to provide consistent and reliable electrical service to much of downtown Sacramento through the effective use of SMUD's existing assets. This chapter describes the project's location, background, objectives, components, and anticipated schedule for construction and operation.

Located at the corner of H and 6th Streets in the city of Sacramento, SMUD's Station A electrical substation is nearing the end of its service life and is being replaced by the new Station G electrical substation (currently under construction) on an adjacent property. Upon completion of Station G, SMUD is proposing to decommission Station A and remove all electrical substation related equipment from within the historic Old Folsom Powerhouse Sacramento Station A building (historic Station A building) and the outdoor substation yard. Following the removal of all Station A equipment, SMUD would construct a new electrical substation (Station H) at the same location of the outdoor substation along the north side of H Street between 6th Street and 7th Street in downtown Sacramento.

The historic Station A building would be completely isolated from the new Station H. Station H would include two 115-kV underground transmission lines, two 115/21-kV transformers, and a metal building structure that would include 21 kV circuit breakers, control and telecommunication equipment, and a canopy structure between the new Station H substation yard and the historic Station A building. Station H's 115-kV lines would tie into the new Station G currently under construction across Government Alley north of the site.

2.2 Project Location and Setting

The project would be located at the northeast corner of H Street and 6th Street in downtown Sacramento (see Figure 2-1). The project site is bordered by H Street to the south, 6th Street to the west, Government Alley to the north, and the Mercy Housing 7th & H Housing Community (Mercy Housing Community) to the east. The location of construction staging is not yet known but, for the purposes of this analysis, is assumed to be within one mile of the project site. As shown in Figure 2-2, much of the project site is currently occupied by Station A equipment and the historic Station A building, which is a California Historical Landmark, listed in the California Register of Historical Resources, and eligible for listing in the National Register of Historic Places.



Source: adapted by Ascent Environmental in 2020

Figure 2-1. Project Vicinity

Source: adapted by Ascent Environmental in 2020

Figure 2-2. Project Site

The project is located in a highly developed area of downtown Sacramento. Sacramento County municipal buildings near the project site include the Sheriff's Department, Recorder's Office, Department of Technology, courthouse, jail, Administration Center, and two parking garages. The Mercy Housing Community is directly adjacent to the eastern edge of the project site. The Mercy Housing Community includes retail and clinic space on the ground floor with 150 residential units spread across seven stories. The Mercy Housing Community also includes two large, landscaped terraces on the second floor. SMUD's Station G substation is currently under construction directly north of the project site across Government Alley and is within the boundary of the Railyards Specific Plan (RSP) area. The privately-owned Hall of Justice Building is across the street to the south and the U.S. District Court is across the street to the southwest. The historic Rail Depot and Sacramento Intermodal Transportation Facility are located approximately 800 feet to the west.

2.3 Project Objectives

In 2015, SMUD completed an initial study/mitigated negative declaration (IS/MND) for the Station A Relocation and Rebuild Project which did not include plans for future use of the historic Station A building or substation yard following final construction of Station G. This project includes the future plans not known at that time and not evaluated in that IS/MND. The CEQA objectives for the project include:

- provide safe and reliable electrical service to existing and proposed development in the downtown Sacramento area;
- meet SMUD's goals of ensuring electrical service reliability in the downtown Sacramento area by 2024;
- provide greater operational flexibility between circuits and substations in the area;
- maximize the use of available SMUD property and resources;
- minimize impacts to nearby sensitive receptors; and,
- minimize potential conflicts with existing planning efforts within the City of Sacramento.

2.4 Required Public Approvals

Elements of the project could be subject to permitting and/or approval authority of other agencies. As the lead agency pursuant to the CEQA, SMUD is responsible for considering the adequacy of the environmental impact report (EIR) and determining if the project should be approved. Other potential permits required from other agencies could include:

State

- California Department of Transportation: permits for movement of oversized or excessive loads on State Highways.

Local

- Sacramento Metropolitan Air Quality Management District: Authority to Construct/Permit to Operate pursuant to Sacramento Metropolitan Air Quality Management District Regulation 2 (Rule 201 et seq.).
- City of Sacramento:
  - Tree removal permit—to comply with the City of Sacramento Tree Ordinance.
  - Transmission Facilities Permit – to comply with Sacramento City Code requirements.
  - Encroachment permit.
  - Improvement plans.
  - Design review.

2.5 Project Description

With the City of Sacramento's continued implementation of both the Central City Specific Plan (CCSP) and the RSP Environmental Impact Report (EIR), maintaining SMUD's ability to provide safe and reliable electrical service within the downtown and the surrounding area is essential. The project involves the decommissioning and removal of outdated Station A equipment that is currently present at the project site within the outdoor area between the historic Station A building and the Mercy Housing Community to the east and constructing new outdoor substation equipment.

As part of the decommissioning of Station A, SMUD would remove and dismantle existing substation equipment, including protection and control equipment within the historic Station A building and transformers and switchgear within the outdoor switchyard. Decommissioning activities would also include the removal of oil pump equipment from within the historic Station A building. Equipment from inside the historic Station A building would be removed through existing doorways and no modifications to the structure would occur. Some equipment may need to be dismantled prior to removal. Additionally, two existing underground 115 kV lines located within the Government Alley to the north of the site would be abandoned in place.

Once equipment associated with Station A has been decommissioned and the existing yard has been cleared, new equipment would be assembled and installed on site. The proposed substation would include two 115 kV underground transmission lines, two

115/21 kV transformers and a metal building structure with a total of nine 21 kV circuit breakers . Station H would tie into the new Station G (currently under construction) via two new 115 kV transmission lines to be located within Government Alley, immediately north of the project site. The proposed electrical equipment to be located on site is anticipated to be no taller than existing Station A equipment currently located at the site, which is approximately 30 feet tall.

As part of the project, SMUD may use limited amounts of Sulfur Hexafluoride (SF_6), a common insulating gas for high-voltage electrical systems, at the project site. Use of the proposed switchgear equipment would comply with recordkeeping, reporting, and leakage emission limit requirements in accordance with California Air Resources Board regulations for reduction of SF_6 emissions. As part of substation operations and maintenance activities, SMUD would monitor existing substation equipment to accurately and immediately identify any SF_6 leaks and immediately repair leaks that are discovered. SMUD is also an active member of the SF_6 Emission Reduction Partnership, which focuses on reducing emissions of SF_6 from transmission and distribution sources.

A canopy structure is proposed to be located between the new Station H substation yard and the historic Station A building. The canopy would be approximately the same height as the existing equipment in the outdoor area with a maximum height expected to be approximately 30 feet in height at its tallest point. The canopy roof would be angled and is designed to shield the control building in the event that bricks fall from the exterior of the Station A building. Prior to the decommissioning of Station A, the structural integrity of the historic Station A building would be evaluated to determine whether upgrades would be required to prevent damage to new substation equipment. Should the study determine that the structural failure of the Station A building would not occur or upgrades could be completed that would ensure structural integrity, the canopy may not be needed.

2.5.1 Project Operation

Operation and access of the new substation generally would be similar to the existing Station A substation yard. Maintenance workers and other SMUD employees would periodically access the site through Government Alley. The historic Station A building would remain unoccupied; however, SMUD personnel would visit the building periodically to conduct routine checks and maintenance, and the Station A building would be used for storage.

2.5.2 Project Construction

Station H would include two 115 kV underground transmission lines; two 115/21 kV transformers; and a metal building structure that would include 21 kV circuit breakers, control and telecommunication equipment, and a canopy structure between the new Station H substation yard and the historic Station A building. Two new 115kV lines would be installed beneath Government Alley to connect Station H to Station G. Excavation associated with construction of these new connections and installation of new equipment would reach a depth of 15 to 30 feet below ground surface (bgs), however, piles needed

for seismic stability/support could reach a depth of approximately 55 feet bgs. SMUD anticipates excavation and removal of existing soil and import of backfill to re-establish grade within the site, though removal and import volumes are not yet known. Lighting within the project site would consist of new light-emitting diode light sources. Lighting fixtures would be selected to complement the proposed site function and surrounding visual character.

Project construction activities would also include removal of the existing concrete block wall, located along H Street, and replacement with a new wall that would shield views of the new equipment from H Street. Some features within the new Station H yard may help shield views from the adjacent Mercy Housing Community at the ground level.

Construction equipment and materials staging area would be located within nearby vacant land. While the staging areas have not yet been identified and would be identified by the contractor based on availability at the time, it is assumed that staging areas would be within one mile of the project site. During construction, access to the project site would be maintained, with the primary access point for construction equipment, deliveries, and workers located from Government Alley to avoid potential conflicts with Light Rail trains along H Street. Therefore, construction activities would require a temporary closure of Government Alley.

Construction would require an average daily worker population of approximately 10 workers, with approximately 30 workers during peak construction activities associated with on-site demolition, excavation, and heavy equipment deliveries and installations.

2.5.3 Project Schedule

The decommissioning of Station A is anticipated to begin in the second half of 2022 and would be completed by early 2023. The construction of Station H is anticipated to begin soon after the decommission of Station A and would be completed in 2024. Construction intensity and hours would be in accordance with the City's Noise Ordinance, contained in Title 8, Chapter 8.68 of the Sacramento City Code. Construction would be limited to the hours between 7 a.m. and 6 p.m. Monday through Saturday, and between the hours of 9 a.m. and 6 p.m. on Sunday.

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3 Existing Environmental Setting, Impacts, and Mitigation

This chapter is organized by environmental resource category; each resource category is organized to provide an integrated discussion of the existing environmental conditions (including regulatory setting and environmental setting), potential environmental effects (including direct and indirect impacts), and measures to reduce significant effects, where feasible, associated with implementation of the Station H Substation project. As shown below and in the Initial Study (IS) (see Appendix B), further analysis was determined to be necessary for potential impacts to archaeological, historical, and Tribal cultural resources as part of this EIR. This chapter, combined with "Mandatory Findings of Significance" as provided in Appendix B also present an analysis of the project's impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State California Environmental Quality Act (CEQA) Guidelines.

Chapter 4, "Other CEQA Sections," includes an analysis of the project's growth-inducing impacts, as required by Section 21100(b)(5) of CEQA. Chapter 5, "Alternatives," presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed project, as required by Section 15126.6 of the State CEQA Guidelines.

Terminology Used In the EIR

This Draft EIR uses the following terms to describe the level of significance of impacts identified during the environmental analysis:

Significant and Unavoidable Impact: An impact that exceeds the defined threshold of significance and cannot be eliminated or reduced to a less than significant level through the implementation of feasible mitigation measures.

Potentially Significant Impact: An impact that exceeds the defined thresholds of significance, and can be reduced to a less than significant level through implementation of feasible mitigation measures. If feasible mitigation measures are not available or would not reduce the magnitude of the impact below the threshold of significance, the impact would be determined significant and unavoidable.

Less-than-Significant Impact: An impact that does not exceed the defined thresholds of significance or that is potentially significant and can be eliminated or reduced to a less than significant through implementation of feasible mitigation measures.

No Impact: Where an environmental issue is evaluated and it is determined that the project would have no effect on the issue, the conclusion is drawn that the proposed SMUD Station H Substation project would have "No Impact" and no further analysis is presented.

Mitigation Measures: The CEQA Guidelines (CCR Section 15370) define mitigation as:

a) avoiding the impact altogether by not taking a certain action or parts of an action;

b) minimizing impacts by limiting the degree of magnitude of the action and its implementation;

c) rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and

e) compensating for the impact by replacing or providing substitute resources or environments.

Cumulative Impacts: An analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation in each section. A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other past, present and reasonably foreseeable projects causing related impacts.

The beginning of the cumulative impact analysis in each technical section includes a description of the cumulative analysis methodology and the geographic or temporal context in which the cumulative impact is analyzed (e.g., the City of Sacramento, the Sacramento Valley Air Basin, other activity concurrent with project construction). In some instances, a project-specific impact may be considered less than significant, but when considered in conjunction with other cumulative projects or activities may be considered significant or potentially significant.

As noted above, where a cumulative impact is significant when compared to existing or baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation of the project contribution is required.

Introduction to the Analysis

In accordance with Section 15126.2 of the State CEQA Guidelines, this draft environmental impact report (Draft EIR) identifies and focuses on the significant direct and indirect environmental effects of the project, giving due consideration to both its short-term and its long-term effects. Short-term effects are generally those associated with construction, and long-term effects are generally those associated with project operations. As part of the IS, prepared for the project and provided in Appendix B, the project was determined to have either less-than-significant impacts with mitigation

incorporated, less-than-significant, or no impact for the majority of environmental resource categories. The following discussion summarizes the analysis conducted for these resource categories, and presents any mitigation determined to be necessary to reduce impacts to less than significant. Refer to Appendix B for further clarification.

Environmental Resource Categories Not Evaluated Further

Aesthetics

The project site is located in a highly developed area of downtown Sacramento. Surrounding uses include Sacramento County municipal buildings, Station G Substation currently under construction, a parking lot under construction for development of a new Sacramento County courthouse, the Hall of Justice Building, and the U.S. District Court is across the street to the southwest. Additionally, the historic Rail Depot and Sacramento Intermodal Transportation Facility are located approximately 800 feet west of the project site. Views in the vicinity of the project site are short- to mid-range and typically reflect the urban character of the surroundings, which are not considered scenic vistas. No scenic highways are present in the vicinity of the project site. The historic Station A building, which is a designated historic structure and located within the project site, is the closest scenic resource due to its importance within a historical context. The project would not result in substantial alterations to the building's interior or exterior. Interior equipment would be removed from the building, but some structural stabilization measures may be implemented in order to ensure seismic integrity of the structure. However, any necessary and minor modifications to the structure would be performed in accordance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995) such that the integrity and aesthetic of the structure would be maintained. In addition, as the proposed replacement equipment within the Station A yard would be in the same location as the existing equipment and would be of similar mass and scale, the project would not further impede long-distance views in the area.

During project construction, views in the project area along H Street and from north of the project site would be modified as a result of the presence of construction equipment and activities. However, the appearance of construction equipment and activities would be temporary, and once construction activities are complete, the project site would appear similar to existing conditions. It should be noted that the existing perimeter fencing would be replaced with a similar wall along H Street and fencing along Government Alley and would be reviewed by the City of Sacramento to ensure consistency of aesthetic conditions.

The project does not propose any zoning changes and project uses would be consistent with existing site uses. Therefore, the project would not conflict with any zoning or scenic quality regulations. Additionally, construction activities would occur during daylight hours and would not require nighttime lighting. Construction equipment is unlikely to have reflective surfaces, other than what is required for safety purposes, and would not be a

substantial source of glare in the area. Operational lighting at the project site would be similar to existing security lighting.

For the reasons above, the project would not result in significant impacts related to aesthetics and this issue is not discussed further.

Agriculture and Forest Resources

The project site does not contain any farmland or lands designated as Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance). The project site is not zoned for agricultural uses, and there are no Williamson Act contracts associated with the project site. Additionally, the project site does not include forest land or timberlands, nor is it zoned for such uses. Therefore, the project would not result in the loss of agricultural/forest land or conversion of agricultural/forest land to non-agricultural/forest use, nor would it conflict with existing zoning for, or cause rezoning of, agricultural/forest land, timberland, or timberland zoned Timberland Production.

For the reasons above, the project would not result in significant impacts related to agriculture and forest resources and this issue is not discussed further.

Air Quality

Air quality impacts associated with project implementation would be primarily construction-related. No long-term emissions beyond existing conditions are anticipated during project operations. During construction, project-generated emissions of reactive organic gases (ROG), oxides of nitrogen (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) would occur as a result of equipment operations (e.g., during site preparation, trenching, conduit duct bank installation). Additional emissions would occur as a result of material delivery and worker commute trips. More specifically, fugitive dust emissions of PM_{10} and $PM_{2.5}$ would occur, although such emissions would be primarily associated with site preparation and trenching activities and would vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance, and vehicle miles traveled on and off the site. Emissions of ozone precursors, ROG and NO_X, would occur as a result of the operation of construction equipment and on-road mobile exhaust. Paving would also result in off-gas emissions of ROG.

Nonetheless and as described in further detail in the IS (Appendix B), project construction would not generate emissions in excess of the Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds for ROG and NO_X, nor would it result in a significant increase in annual emissions of PM_{10} and $PM_{2.5}$. However, the project, without the application of best management practices (BMPs) and Best Available Control Technology (BACT), would generate daily emissions of PM_{10} and $PM_{2.5}$ in excess of the SMAQMD thresholds during construction activities. Construction emissions would be temporary and would not be generated following the completion of project construction. With implementation of Mitigation Measure 3.3-1, the emission of criteria air pollutants

and precursors would not exceed SMAQMD thresholds, and impacts related to criteria pollutant emissions would be less than significant.

Mitigation Measure 3.3-1: Implement SMAQMD Basic Construction Emission Control Practices.

During construction, the contractor shall comply with and implement SMAQMD's Basic Construction Emission Control Practices, which includes SMAQMD-recommended BMPs and BACT, for controlling fugitive dust emissions. Measures to be implemented during construction include the following:

- Water all exposed surfaces at least 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 (2) feet of freeboard space on haul trucks transporting soil, sand, or other loose material on the site. Cover any haul trucks that will be traveling along freeways or major roadways.
- Use wet power vacuum street sweepers to remove any visible track-out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speed on unpaved roads to 15 miles per hour.
- All roadways, driveways, sidewalks, parking lots to be paved should 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 (required by California Code of Regulations Title 13, Sections 2449[d][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. Equipment will be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Minor odors from the use of heavy-duty diesel equipment and the laying of asphalt during project construction activities would occur. However, these odors would be intermittent and temporary and would dissipate rapidly from the source within an increase in distance. Therefore, project construction is not anticipated to result in an odor-related impact. Project operation would not include activities that typically generate odors, such as wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, or food processing

facilities. Activities associated with project operation would be limited and would not generate odors.

The project is located adjacent to sensitive receptors including the Mercy Housing Community to the east. While construction activities would result in emissions, the analysis in the IS concluded that the project's short-term construction activities would not expose sensitive receptors to prolonged TAC concentrations. For the reasons above, the project would not result in significant impacts related to air quality, and this issue is not discussed further.

Biological Resources

The project site is located within an urban setting within developed land cover and landscaped vegetation; landscaped vegetation and does not contain sensitive natural communities (e.g., riparian habitat, elderberry savanna, and northern hardpan vernal pools).

During project construction, including removal and reconstruction of the masonry wall along H Street, construction activities may require work within the sidewalk area of H Street and removal of existing landscape trees. SMUD would comply with Sacramento City Code Section 12.56080(E) requiring approval from the City's Public Works Director prior to any work that may cause injury or removal of city and/or protected private trees.

Ground disturbance and staging associated with the project is located within developed land and as special-status plants are not expected to occur on the project site. However, mature trees in the project adjacent area provide potential nesting sites for Swainson's hawk and white-tailed kite and could support nests of common raptors. The common raptors that may nest adjacent to the project site include: Cooper's hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), and great horned owl (*Bubo virginianus*). In addition to common raptors, trees adjacent to the project site may also support other common nesting birds. The nests of common raptors and other common birds are protected under Sections 3503 and 3503.5 of California Fish and Game Code. The IS identified that implementation of Mitigation Measure 3.4-1 would reduce impacts related to nesting birds by requiring pre-construction nesting surveys for nesting birds, and no-disturbance buffers around active nests.

Mitigation Measure 3.4-1: Avoid disturbance of nesting birds.

If construction will occur during the nesting season (between February 1 and August 31), a SMUD project biologist/biological monitor will conduct pre-construction nesting bird surveys to determine if birds are nesting in the work area or within 0.25 mile for Swainson's hawk and 500 feet for all other nesting birds of the project site.

The pre-construction nesting bird surveys will identify on-site bird species and any nest-building behavior. If no nesting Swainson's hawks are found on or within 0.25

mile or if no nesting birds are found on or within 500 feet of the project site during the pre-construction clearance surveys, construction activities may proceed as scheduled.

If pre-nesting behavior is observed, but an active nest of common nesting bird has not yet been established (e.g., courtship displays, but no eggs in a constructed nest), a nesting bird deterrence and removal program will be implemented. Such deterrence methods include removal of previous year's nesting materials and removal of partially completed nests in progress. Once a nest is situated and identified with eggs or young, it is considered to be "active" and the nest cannot be removed until the young have fledged.

If active Swainson's hawk nests are found within the nest survey area, the construction contractor shall avoid impacts on such nests by establishing a no-disturbance buffer around the nest. Monitoring of the nest by a qualified biologist during construction activities shall be required if the activity has the potential to adversely affect the nest. Based on guidance for determining a project's potential for impacting Swainson's hawks (Swainson's hawk Technical Advisory Committee 2000), projects in urban areas have a low risk of adversely affecting nests greater than 600 feet from project activities. Therefore, 600 feet is anticipated to be the adequate buffer size for protecting nesting Swainson's hawks from disturbances associated with the proposed project. However, the qualified biologist shall consult with the California Department of Fish and Wildlife to confirm the adequacy of the no-disturbance buffer and/or if the buffer is reduced based on the biologist professional judgement.

If an active nest of common bird species is found in or within 500 feet of the project site during construction, a "No Construction" buffer zone will be established around the active nest (usually a minimum radius of 50 feet for passerine birds and 500 feet for raptors) to minimize the potential for disturbance of the nesting activity. The project biologist/biological monitor will determine and flag the appropriate buffer size required, based on the species, specific situation, tolerances of the species, and the nest location. Project activities will resume in the buffer area when the project biologist/biological monitor has determined that the nest(s) is (are) no longer active or the biologist has determined that with implementation of an appropriate buffer, work activities would not disturb the bird's nesting behavior.

If special-status bird species are found nesting on or within 500 feet of the project site, the project biologist/biological monitor shall notify SMUD's project manager to notify CDFW or USFWS, as appropriate, within 24 hours of first nesting observation.

The project site does not contain any wetlands, streams, or other aquatic habitat that could be considered jurisdictional waters of the United States or state. project site also does not support native wildlife nursery sites. The project would not alter any existing wildlife corridor and would not interfere with the movement of migratory fish or wildlife

species. The project site is not located within the plan area of an adopted habitat conservation plan, natural community conservation plan or other applicable and approved habitat conservation plan.

For the reasons above, the project would not result in significant impacts related to biological resources, and this issue is not discussed further.

Energy

An estimated 3,600 gallons of gasoline and 28,000 gallons of diesel would be consumed during project construction, accounting for both onsite equipment use and offsite vehicle travel. This one-time energy expenditure required to construct the project would be nonrecoverable. The energy needs of the project during construction would be temporary and would not require additional capacity or increase peak or base period demands for electricity or other forms of energy. The project would generate minimal vehicle trips during operation associated with ongoing maintenance of the facility, which would not be notably greater than the existing vehicle trips accessing the project site. These maintenance trips would be essential to ensuring that Station H be functional to supply energy to customers within the SMUD service area. Therefore, the project would not result in an inefficient, wasteful, or unnecessary consumption of energy resources. The project includes the replacement of existing electrical equipment and would result in increased efficiency in transmitting energy between source and end destinations. Thus, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

For the reasons above, the project would not result in significant impacts related to energy resources, and this issue is not discussed further.

Geology and Soils

No Alquist-Priolo Earthquake Fault Zones exist in Sacramento County (CGS 2010). Consequently, the project is not expected to expose people or structures to adverse effects caused by the rupture of a known fault. Additionally, the project site is located in a flat area of downtown Sacramento where there is no risk of landslides (City of Sacramento 2017:4.6-21). The project would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the project would have no impact related to soil suitability for use of septic tanks or alternative wastewater disposal systems. The project site is located in the Sacramento Valley, which has historically experienced a low level of seismic ground shaking. The California Geological Survey has identified the region as an area of low to moderately low earthquake shaking potential (CGS 2016). The project would be constructed in a manner consistent with the California Building Code (CBC) Title 24, which identifies specific design requirements to reduce damage from strong seismic ground shaking, ground failure, landslides, soil erosion, and expansive soils. The potential for erosion and topsoil loss at the project site would be minimal because the project would prepare and implement erosion and sediment control plans and comply with the requirements of the CBC. The two new 115kV lines that would tie

Station H into Station G would be placed in a series of conduits encased in concrete. Trenches associated with underground infrastructure would then be backfilled with a cementitious slurry mixture or compacted aggregate base to the roadway subgrade elevation to reduce the risk of expansive soils. The downtown area of Sacramento is not considered sensitive for paleontological resources because much of the area has been previously disturbed, excavated, and filled with non-native soil (City of Sacramento 2017:4.6-11). Nonetheless, ground-disturbing activities could result in uncovering currently unknown resources and cause a substantial change in the significance of an undiscovered unique paleontological resource or geologic feature. Compliance with Sacramento General Plan Policy HCR 2.1.16 requires that proper protocols be implemented if paleontological resources are discovered during excavation or construction. Compliance with the policies and implementation programs contained in the General Plan would limit impacts to paleontological resources.

For the reasons above, the project would not result in significant impacts related to geology and soils, and this issue is not discussed further.

Greenhouse Gases

Greenhouse gas (GHG) emissions associated with implementation of the project would be generated during project construction. Project-related construction activities would result in the generation of GHG emissions from the use of heavy-duty off-road construction equipment and vehicle use during worker commute. Construction activities would include site preparation, trenching, and Station H metal switchgear construction. SMAQMD has established quantitative significance thresholds for evaluating GHG emissions. For construction of all types, emissions due to land development projects, the established significance threshold is 1,100 metric tons of carbon dioxide equivalent ($MTCO_2e$) annually (SMAQMD 2020). Total construction-related GHG emissions for the project would be primarily generated in 2023 and would be no more than 338 $MTCO_2e$. Therefore, construction-related GHG emissions would not exceed SMAQMD's threshold of significance. The project would not generate any additional GHG emissions beyond existing conditions during operations as operational activities would be limited to operation of a similar substation to the existing on-site use with occasional inspection and maintenance. In general, it is expected that the new substation equipment would be more efficient than existing equipment. Also, Station H is intended to serve increased density in the downtown area, which is consistent with regional efforts to reduce GHG emissions. Thus, the project would not conflict with any applicable plan, policy, or regulation adopting for the purpose of reducing emissions of GHGs.

For the reasons above, the project would not result in significant impacts related to GHGs, and this issue is not discussed further.

Hazards and Hazardous Materials

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip. Implementation of

the project would not result in an aviation-related safety hazard for people residing or working in the project area. Additionally, the project site is not adjacent to wildlands, and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to developed areas.

One public school is within one-quarter mile of the project site. Small quantities of hazardous materials such as fuels, oils, and lubricants would be used during project construction. SMUD would conduct testing of soils to be removed from the project site. Ongoing groundwater testing would continue to take place in the South Plume Groundwater Study Area. The project would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials. Compliance with applicable regulations regarding hazardous materials would reduce the potential for hazardous emissions within one-quarter mile of existing schools.

While there are active hazardous and cleanup sites located within the project vicinity, the project is not located on an active site included on a list of hazardous materials sites (SWRCB 2020; DTSC 2020). Further, if any hazardous materials or conditions are discovered during project construction, SMUD and its contractor would comply with existing laws and regulations related to the use, disposal, and transport of hazardous materials.

Project construction may require temporary lane closures and closure of Government Alley that could interfere with or slow down emergency vehicles. However, project activities that may involve public right-of-way would be required to obtain an encroachment permit from either Caltrans, Regional Transit, or the City of Sacramento. As part of this encroachment permit application, SMUD would be required to prepare and then later implement a traffic control plan, which would require the provision of temporary traffic controls and maintenance of emergency access during construction. Once project construction is complete, all roads (and Government Alley) would return to their pre-construction state and project operations would not interfere with emergency repose or evacuation plans.

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip. Implementation of the project would not result in an aviation-related safety hazard for people residing or working in the project area. Additionally, the project site is not adjacent to wildlands, and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to developed areas.

For the reasons above, the project would not result in significant impacts related to hazards and hazardous materials, and this issue is not discussed further.

Hydrology and Water Quality

Drainage from the project flows into the City's combined sewer system (CSS) and is discharged to the Sacramento River, which is located within the Sacramento River Basin. As such, the applicable water quality standards are listed in the Fifth Edition of the Water

Quality Control Plan (Basin Plan) For the Sacramento River and San Joaquin River Basins (CRWQCB 2018).

Project construction activities would involve the excavation and movement of soil, which would temporarily increase erosion and siltation potential at the site. If not properly controlled, these activities could accidentally discharge wastes into waterways through runoff. However, SMUD would comply with the existing submittal and approval requirements associated with the Stormwater Management and Control Code, the Grading, Erosion and Sediment Control Ordinance, as well as the NPDES Regional MS4 Permit, which would necessitate the implementation and maintenance of on-site BMPs to control potential erosion and siltation and prevent discharges off-site.

To reduce or eliminate construction-related water quality effects, the City of Sacramento's Grading Ordinance would require future public or private contractors to comply with the requirements of the City's Stormwater Quality Improvement Plan (SQIP). As the project is not expected to disturb more than one acre of land, coverage would not be needed under the NPDES General Construction Permit. However, consistent with City requirements, the project would be required to implement BMPs intended to reduce pollutants in stormwater and other non-point source runoff. The City's SQIP and the Stormwater Quality Design Manual for the Sacramento Region include BMPs to be implemented to mitigate impacts from new development and redevelopment projects.

Should dewatering be required during project construction, water would be collected and treated prior to discharge, in accordance with City requirements. Dewatering activities would be temporary, and the volume of groundwater withdrawn would be very small relative to the subbasin's capacity. No groundwater would be withdrawn during project operation. In accordance with City requirements. SMUD and its construction contractor would coordinate with the City to determine the maximum amount that could be discharged to the CSS so that the project, in conjunction with other sources of stormwater, would not exceed the capacity of the existing system.

Because the project would involve construction activities within previously developed areas, which are primarily paved areas, the project would not involve construction practices or develop facilities that would substantially prevent or otherwise redirect groundwater resources in the project site. Implementation of the project would not result in an increase in impervious surfaces; there would be no change in surface infiltration characteristics affecting groundwater recharge and the project would not be expected to substantially increase the rate or amount of surface runoff in or near the project site.

The project is located within an area of minimal and reduced flood hazard due to existing levee infrastructure (Zone X), as identified on Federal Emergency Management Agency (FEMA) flood hazard maps (FEMA 2020). The project is in an area of mostly flat terrain with no large open bodies of water. For these reasons, the project would not be expected to be inundated. Additionally, construction impacts would be temporary and project operation would consist of electrical equipment that would not impede or redirect flood flows.

For the reasons above, the project would not result in significant impacts related to hydrology and water quality, and this issue is not discussed further.

Land Use and Planning

The project would involve the replacement of existing electrical equipment with new above and underground electrical equipment in a highly developed area of downtown Sacramento. The project would not introduce any barriers within the project area and would not lead to a physical division of an established community. The project would involve a continuation of use of the site as an electrical substation. The project does not propose any land use changes, and once operational, would be similar in scale and type to the existing use. As discussed in the IS under the "Biological Resources" section, SMUD would comply with Sacramento City Code Section 12.56080(E) requiring approval from the City's Public Works Director prior to any work that may cause injury or removal of city and/or protected private trees. The project would not conflict with any adopted plans, policies, or regulations adopted for avoiding or mitigating an environmental effect.

For the reasons above, the project would not result in significant impacts related to land use and planning, and this issue is not discussed further.

Mineral Resources

As noted in Appendix B, no known mineral deposits are present on the project site or in the vicinity of the project site. Due to the lack of known mineral deposits in the area, project implementation would not result in a loss of availability of locally important mineral resources or a known mineral resource that would be of value to the region and the residents of the state.

For the reasons above, the project would not result in significant impacts related to mineral resources, and this issue is not discussed further.

Noise and Vibration

Noise would be generated by the project during construction and operation. However, the project would adhere to the applicable City noise standard for construction-generated noise. After construction is completed, the project would not appreciably increase the number of employees or visitors to the project area. Daily operation of electrical substation facilities generates noise primarily from the operation of transformer cooling equipment and fans; because the number of transformers would be decreased from six to two as part of the project and new equipment tends to be quieter (e.g., more up-to-date technology, cleaner, more efficient), noise levels could decrease from existing conditions.

The project would not include any operational sources of ground vibration. However, construction activities would generate temporary ground vibration, the intensity of which would depend on the specific construction equipment used and activities involved. The most vibration–intensive activity performed during project construction would be the

installation of auger cast displacement piles for construction of various support structures. Although construction activity would result in elevated vibration levels at the Mercy Housing Community, construction would be temporary and intermittent and would only occur during the less sensitive daytime hours between 7 a.m. and 6 p.m., Monday through Saturday and between 9 a.m. and 6 p.m. on Sunday, pursuant to the City's Noise Control Ordinance standard. However, construction activity could expose the historic Station A building to levels of ground vibration that exceed the threshold for structural damage to a historic structure. The IS identified that implementation of Mitigation Measures 3.13-a and 3.13-b would reduce impacts related to construction-related vibration by requiring SMUD and the design-build team to restrict phasing operations, locate equipment as far from receptors as feasible, and prepare and implement a vibration control plan. This plan will refine appropriate setback distances, require SMUD to conduct pre-construction surveys, require the construction contractor to monitor and document all pile drilling-generated vibration levels at sensitive receptors, and identify other measures and/or alternative methods of construction to reduce vibration if necessary. With implementation of these mitigation measures, project impacts would be reduced to a less-than-significant level.

Mitigation Measure 3.13-a: Implement measures to reduce ground vibration.

To reduce vibration impacts from construction activities, SMUD will require the design-build team and engineers to implement the following measures:

- To the extent feasible, earthmoving and ground-impacting operations (e.g., pile drilling) will be phased so as not to occur simultaneously in areas close to sensitive receptors. The total vibration level produced could be significantly less when each vibration source is operated at separate times.

- Where there is flexibility in the location of activating involving the use of heavy-duty construction equipment, especially auger drill rigs for installing auger cast displacement piles, the equipment will be operated as far away from vibration-sensitive receptors as reasonably possible.

Mitigation Measure 3.13-b: Develop and implement a vibration control plan.

A vibration control plan will be developed by SMUD's design-build team to be submitted to and approved by SMUD prior to initiating any pile drilling activities. Applicable elements of the plan will be implemented before, during, and after pile drilling activity. The plan will consider all potential vibration-inducing activities that would occur and require implementation of sufficient measures to ensure that nearby sensitive receptors, including the historic Station A building, are not exposed to vibration levels that would result in structural damage. Items that will be addressed in the plan include, but are not limited to, the following:

- Identification that the maximum allowable vibration levels at nearby buildings consist of Caltrans-recommended standards with respect to the prevention of

architectural building damage, specifically: 0.25 in/sec PPV for the historic Station A building.

- SMUD or its contractor will conduct pre-construction surveys to identify any pre-existing structural damage to the historic Station A building.

- SMUD will identify minimum setback requirements for different types of ground vibration–producing activities (e.g., pile drilling) for the purpose of preventing damage to nearby structures and preventing negative human response will be established based on the proposed construction activities, locations, and the maximum allowable vibration levels identified above. Factors to be considered include the specific nature of the vibration producing activity, local soil conditions, and the fragility/resiliency of the nearby structures. Initial setback requirements can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.

- The construction contractor will monitor and document all pile drilling-generated vibration levels at the Station A building to ensure that applicable thresholds are not exceeded. The construction contractor will submit recorded vibration data on a twice-weekly basis to SMUD. If it is found at any time by the design-build team or SMUD that thresholds are exceeded, pile drilling will cease in that location and methods will be implemented to reduce vibration to below applicable thresholds, or an alternative construction method will be used at that location.

The project is not located within an airport land use plan or within two miles of a public airport or public use airport. Additionally, the project is not located within two miles of a private airstrip. Finally, the project would not include any new land uses where people would live or work.

For the reasons above, the project would not result in significant impacts related to noise and vibration, and this issue is not discussed further.

Population and Housing

The project is intended to help SMUD provide a reliable source of electricity to the downtown area and would not include construction of new housing or commercial business. Therefore, no direct population growth would result from project implementation. The project would also not extend roads or other infrastructure to new areas that would induce growth in new locations. Further, no persons or homes would be displaced as a result of implementation or operation of the proposed project.

For the reasons above, the project would not result in significant impacts related to population and housing, and this issue is not discussed further.

Public Services

Implementation of the project would not increase demand for fire or police protection services such that the construction of new or expansion of existing fire or police service facilities would be required. The project does not include a residential/commercial component that would increase demand for services nor would it increase the service boundary of any existing public service providers. As noted above, the project would not provide any new housing that would generate new students in the community or a need for new or expanded park facilities. For the reasons above, the project would not result in significant impacts related to public services, and this issue is not discussed further.

Recreation

The project would not involve any changes to permitted uses of existing recreational facilities, nor would it require the construction of new recreational facilities or the expansion of existing ones that might have an adverse physical effect on the environment. Thus, the project would not result in potentially significant impacts related to recreation, and this issue is not discussed further.

Transportation

Project construction would temporarily interfere with existing vehicle, transit, bicycle, and pedestrian circulation as it would include temporary closures of roads, sidewalks, and bike lanes. Upon completion of construction, all facilities would be returned to their pre-project condition. Project operation would not generate additional vehicle, transit, pedestrian, or bicycle use, so there would be no conflicts with programs, plans, ordinances, or policies related to circulation. Project operation would not result in any changes in road geometry or new uses. The IS identified that implementation of Mitigation Measure 3.17-1 would reduce impacts related to the circulation system by ensuring that accessibility and connectivity are maintained during construction activities and would reduce impacts related to inadequate emergency access ad traffic hazards during construction by requiring implementation of a plan to maintain access for emergency vehicles during construction.

Mitigation Measure 3.17-1: Traffic Control Plan.

Prior to project construction within or adjacent to public roadways, SMUD's construction contractor shall develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works.[1] The plan shall identify temporary lane, sidewalk, bicycle lane, and transit stop closures and provide information regarding how access and connectivity will be maintained during construction activities. The plan shall include details regarding traffic controls that would be employed, including signage, detours, and flaggers. The traffic control plan

[1] Due to the location of light rail tracks adjacent to the project site, SMUD has included Sacramento Regional Transit as an agency to receive a copy of the Traffic Control Plan since issuance of the IS in November 2020.

shall be implemented by the contractor during construction to allow for the safe passage of vehicles, pedestrians, and cyclists along the project route.

Temporary construction activities would result in slight increases in vehicle trips associated with worker commutes and materials delivery. However, these additional trips would only occur during the construction period. During operation, no new vehicle trips would be generated as the project involves existing facilities with existing maintenance and operations activities. The project would not change the amount of development projected for the area, would be consistent with the population growth and vehicle miles traveled projections in regional and local plans, and would have only a slight and temporary increase in vehicle miles traveled during construction.

For the reasons above, the project would not result in significant impacts related to transportation and circulation, and this issue is not discussed further.

Utilities and Service Systems

Project construction could include dewatering and water could be discharged to the City's CSS. Water discharged to the City's CSS would be temporary and would not exceed system capacity as water could be retained on the project site until there is adequate capacity. Once operational, the project would use the CSS for the wastewater generated by the restroom in the control building, which is expected to generate a similar amount of wastewater as the existing facilities in the historic Station A building.

The project would generate solid waste during construction activities during the removal of existing equipment and pavement on the project site. Construction debris could include asphalt, concrete, scrap lumber, finishing materials, metals, and organic materials. Compliance with the 2013 CALGreen Code and the City Construction and Demolition Debris Recycling Ordinance would result in a reduction of construction waste and demolition debris and increase recycling. In addition, the construction contractor would comply with goals of the Sacramento 2035 General Plan Update also contains goals regarding solid waste generation and recycling. Landfilled waste would be delivered to facilities that have a large volume of landfill capacity available to serve the project during construction. Project operation would include intermittent visits from SMUD personnel, so it is expected that very little solid waste would be generated during operation, similar to existing conditions.

For the reasons above, the project would not result in significant impacts related to utilities, and this issue is not discussed further.

Wildfire

The project would not exacerbate wildfire risks as the project site is not located within a wildfire hazard zone, is substantially surrounded by developed land, and is not near wildland areas. The project is located in an area of predominantly flat terrain and would

not involve the changing to slopes that could expose people to risks of flooding from post-fire slope instability.

Construction of the project could require temporary road lane closures that could temporarily impair emergency response plans or evacuation plans. However, as required by the City, SMUD and its construction contractor would develop and implement a traffic control plan that would maintain access and connectivity during project construction activities. Because access and connectivity would be maintained during construction, the project would not substantially impair an emergency response plan or evacuation plan.

The project involves the removal and reinstallation of electrical transmission and distribution infrastructure to provide supply reliability and serve existing and planned future uses in the downtown area. The project would not exacerbate fire risk because the project would adhere to all safety requirements for the equipment to be replaced.

For the reasons above, the project would not result in significant impacts related to wildfire, and this issue is not discussed further.

Mandatory Findings of Significance

As noted in the IS, the project is located in downtown Sacramento in an infill and transit-oriented area. There are few biological resources on the site and as described in Section 3.4, “Biological Resources,” of the IS, the proposed project’s impacts on special-status species and potential conflicts with the City’s tree ordinance would be less than significant with mitigation. However, the IS concluded that additional evaluation is necessary to determine whether the project would affect archaeological, historic, or tribal cultural resources.

Generally, because of the limited scope of the project (i.e., limited construction activities within less than 0.5 acre and no expansion of use beyond existing conditions), implementation would not result in cumulatively considerable contributions to the cumulative effects of development in the area. Evaluation of the project’s contribution to cumulative impacts related to archaeological, historic, and tribal cultural resources are evaluated in Section 3.1, “Archaeological, Historical, and Tribal Cultural Resources,” of this Draft EIR.

Environmental Resource Categories Evaluated Further

As described in Chapter 1, “Introduction,” this EIR’s analysis provides a more detailed evaluation of a single environmental resource topic because other topics have already been addressed in the IS (see Appendix B):

- Section 3.1, Tribal Cultural Resources
- Section 3.2, Cultural Resources

The format of Sections 3.1 and 3.2 is as follows:

Regulatory Setting gives a summary of regulations, plans, policies, and laws that are relevant to the environmental effects in each resource section. Regulations originating from the federal, state, and local levels are each discussed as appropriate.

Environmental Setting presents the existing environmental conditions on the project site and surrounding area as appropriate, in accordance with the State CEQA Guidelines (California Code of Regulations [CCR] Section 15125). This setting generally serves as the baseline against which environmental impacts are evaluated.

Environmental Impacts and Mitigation Measures identifies the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with the State CEQA Guidelines (CCR Sections 15126, 15126.2, and 15143). The thresholds of significance used in this Draft EIR are based on the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and regulatory standards of federal, state, and local agencies. The level of each impact is determined by comparing the effects of the project to the environmental setting. Key methods and assumptions used to frame and conduct the impact analysis as well as issues or potential impacts not discussed further (such issues for which the project would have no impact) are also described.

Project impacts are organized numerically in each subsection (e.g., Impact 3.1-1, Impact 3.1-2, Impact 3.1-3, etc.). A bold-font impact statement, a summary of each impact, and its level of significance precedes the discussion of each impact. The discussion that follows the impact summary includes the substantial evidence supporting the impact significance conclusion.

The Draft EIR must describe any feasible measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts, and the measures are to be fully enforceable through incorporation in and adoption of a Mitigation Monitoring and Reporting Plan (Public Resources Code Section 21081.6[b]). Mitigation measures are not required for effects that are found to be less than significant. Where feasible mitigation for a significant impact is available, it is described following the impact along with its effectiveness at addressing the impact. Each identified mitigation measure is labeled numerically to correspond with the number of the impact that would be mitigated by the measure. Where sufficient feasible mitigation is not available to reduce impacts to a less-than-significant level, or where SMUD lacks the authority to ensure that the mitigation is implemented when needed, the impacts are identified as remaining “significant and unavoidable.”

3.1 Tribal Cultural Resources

This section analyzes and evaluates the potential impacts of the project on known and unknown Tribal cultural resources. Tribal cultural resources, as defined by Assembly Bill (AB) 52, Statutes of 2014, in Public Resources Code (PRC) Section 21074, are sites, features, places, cultural landscapes, sacred places and objects, with cultural value to a Tribe. A Tribal cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. Because two Tribal cultural resources are known to be in the immediate vicinity of the project site, unanticipated Native American human remains would be considered a Tribal cultural resource, and are therefore analyzed in this section.

One comment letter regarding Tribal cultural resources was received in response to the Notice of Preparation (see Appendix A). The Native American Heritage Commission (NAHC) requested AB 52 and Senate Bill (SB) 18 compliance information; SB 18 does not apply to the project because there is no General Plan amendment associated with the project (which is the trigger for SB 18 compliance). Additionally, SB 18 is not a CEQA requirement and therefore is not discussed in this section. AB 52 compliance is described below.

3.1.1 Regulatory Setting

Federal

National Register of Historic Places

The National Register of Historic Places (NRHP) is the nation's master inventory of known historic properties. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1. The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);

2. It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and

3. It possesses at least one of the following characteristics:

   Criterion A Is associated with events that have made a significant contribution to the broad patterns of history (events).

Criterion B Is associated with the lives of persons significant in the past (persons).

Criterion C Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).

Criterion D Has yielded, or may be likely to yield, information important in prehistory or history (information potential).

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee consideration in planning for federal or federally-assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

State

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are also listed in the California Register of Historical Resources (CRHR). The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historical resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a historical resource must meet one of the above criteria and retain integrity to be listed in the CRHR. The CRHR uses the same seven aspects of integrity used by the NRHP.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "[T]ribal cultural resources." PRC Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a [T]ribal cultural resource is a project that may have a significant effect on the environment." PRC Section 21074 states:

a) "Tribal cultural resources" are either of the following:

   1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:

      A) Included or determined to be eligible for inclusion in the CRHR.

      B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

   2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "[T]ribal cultural resources," defined in PRC Section 21074. Pursuant to CEQA requirements, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration.

Health and Safety Code, Section 7052

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If they are determined to be those of a Native American, the coroner must contact NAHC.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (PRC Section 5097.9) applies to both State and private lands. The act requires, upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are those of a Native American, the coroner must notify the Native American Heritage Commission (NAHC), which notifies (and has the authority to designate) the most likely descendants (MLD) of the deceased. The act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Public Resource Code Section 5097

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American human burials falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Local

City of Sacramento 2035 General Plan

The following policies are considered relevant to the project and Tribal cultural resources in the vicinity of the project:

- **Policy HCR 2.1.3:** Consultation. The City shall consult with appropriate organizations and individuals (e.g., California Historical Resources Information System (CHRIS) Information Centers, the Native American Heritage Commission (NAHC), the CA Office of Planning and Research (OPR) “Tribal Consultation Guidelines,” etc.,) and shall establish a public outreach policy to minimize potential impacts to historic and cultural resources.

3.1.2 Environmental Setting

The project site is located near the border of Valley Nisenan and Plains Miwok territory. The following is a summary of Valley Nissenan and Plains Miwok.

Valley Nissenan

Valley Nisenan speak a language that is a subdivision of the Maiduan Family of Penutian languages. Traditional Nisenan territory extended to the crest of the Sierra Nevada, but Valley Nisenan generally did not range beyond the valley and lower foothills. The basic social and economic group of the Nisenan was the family or household unit, with the nuclear and/or extended family forming a corporate unit. Among the Nisenan, these groups combined to form tribelets, which were their largest sociopolitical unit. Each tribelet had a chief or headman who exercised political control over all villages within it. Tribelet populations of Nisenan were as large as 500 persons living in permanent villages that were usually located on raised areas to avoid flooding (JCC 2020:6.3).

Nisenan tribelet territory averaged approximately 100 square miles. Within these areas, the Nisenan practiced seasonal transhumance, moving from one area or elevation to another to harvest plants, fish, and hunt game across contrasting ecological zones that are in relatively close proximity to each other (JCC 2020:6.3).

Valley Nisenan used a variety of utilitarian flaked and ground stone tools. Obsidian was a highly valued material for tool manufacture and was imported. Other tools and weapons were made of bone and wood, including stirring sticks, mush paddles, pipes, and hide preparation equipment. Cordage was made from plant material and used to construct fishing nets and braided and twined tumplines. Valley Nisenan also fostered trading relationships with surrounding groups for commodities such as salt, marine shells, and basketry (JCC 2020:6.4).

Fishing formed a large component of Valley Nisenan subsistence activity. Consequently, they used an extensive assemblage of fishing-related implements and facilities including: spears; cordage lines with bone fishhooks; harpoons with detachable points; dams for stream diversion; nets of cordage and basketry; weirs; and an array of fish traps. Tule rafts, lashed log rafts, and bark rafts were also used to acquire resources and facilitate travel (JCC 2020:6.4).

Other specialized food processing and cooking techniques primarily included grinding and leaching of ground acorn and buckeye meal. Acorns, buckeyes, pine nuts, seeds, berries, and meat were routinely processed using bedrock mortars and pestles. A soaproot brush was used to sweep meal into mortar cups and collect flour. Fist-sized, heated stones were used to cook and/or warm liquid-based foods such as acorn gruel. Whole acorns were stored in granaries. In addition to these plant resources, other plants may have been managed, primarily by controlled burning, for both food (e.g., edible grasses and seed producing plants) and the manufacture of baskets and other useful equipment (JCC 2020:6.4).

Plains Miwok

Plains Miwok are members of the Utian Language Family of the Penutian Stock. Plains Miwok inhabited the lower reaches of the Mokelumne and Cosumnes Rivers and the banks of the Sacramento River from Rio Vista to Freeport (JCC 2020:6.4).

The basic social and economic group of Plains Miwok was the family or household unit, with the nuclear and/or extended family forming a corporate unit. These basic units were combined into distinct, named village or hamlet groups, which functioned as headquarters of a localized patrilineage. Lineage groups were important political and economic units that combined to form tribelets, with the largest sociopolitical unit of Plains Miwok numbering between 300 and 500 persons (JCC 2020:6.4).

Each tribelet had a chief or headman who exercised political control over the villages that comprised it. Tribelets assumed the name of the head village where the chief resided. The office of tribelet chief was hereditary, with the chieftainship being the property of a single patrilineage within the tribelet. The office usually passed from father to son, but in the absence of a male heir a daughter could assume the office of chief (JCC 2020:6.4).

Plains Miwok built a variety of structures including residential dwellings, ceremonial structures, semisubterranean sweat lodges, and menstruating huts. The typical dwelling was a thatched house, consisting of a conical framework of poles that was covered by brush, grass, or tules. Semi subterranean earth lodge roundhouses were also built for ceremonial gatherings, assemblies, local feasts, and housing visitors (JCC 2020:6.4-5).

A variety of flaked and ground stone tools were common among Plains Miwok (e.g., knives, arrow and spear points, and rough cobble and shaped pestles). Plains Miwok imported obsidian, which was a highly valued material for tool manufacture. They also maintained trading relationships with neighboring groups for commodities such as salt, marine shells, and basketry. In addition, other tools and weapons were made of bone and wood, including both simple and sinew-backed bows, arrow shafts and points, looped stirring sticks, flat-bladed mush paddles, pipes, and hide preparation equipment. Cordage was made from plant material and used to construct fishing nets and braided and twined tumplines. Soaproot brushes were commonly used during grinding activities to collect meal and/or flour (JCC 2020:6.5).

Fishing formed a large component of Plains Miwok subsistence activity. Consequently, they used an extensive assemblage of fishing-related implements and facilities including: spears; cordage lines with bone fishhooks; harpoons with detachable points; dams for stream diversion; nets of cordage and basketry; weirs; and an array of fish traps. In addition, tules, lashed logs, and bark rafts were used to acquire resources and facilitate travel (JCC 2020:6.5).

Specialized food processing and cooking techniques used by Plains Miwok included grinding and leaching of ground acorn and buckeye meal. Acorns, buckeyes, pine nuts, seeds and other plant foods, and meat were routinely processed using bedrock mortars

and pestles. A soaproot brush was used to sweep meal into mortar cups and collect flour. Fist-sized, heated stones were used to cook and/or warm liquid-based foods such as acorn gruel. In addition to these plant resources, other plants may have been managed, primarily by controlled burning, for both food (e.g., edible grasses and seed producing plants) and the manufacture of baskets and other useful equipment (JCC 2020:6.5).

Contemporary Native American Setting

Archaeologists routinely focus on traditional Native American culture and ignore current and vibrant Native American culture. This approach is not sufficient to provide a context or set of values maintained by the current Native American community related to their history and the landscape. Tribes view themselves as contemporary stewards of their culture and the landscape, representing a continuum from the past to the present. They are resilient, vibrant, and active in the community. Tribes maintain their connection to their history and ongoing culture by practicing traditional ceremonies, engaging in traditional practices (e.g., basketry), and conducting public education and interpretation. The acknowledgement of Native American history and the persistence of Tribes cannot be overlooked and should be recognized. Indeed, the Native American community and their history are commemorated in the City of Sacramento, on the grounds of the Capitol, and at Sacramento City Hall (JCC 2020:6.7).

Known Ethnographic Villages Near Downtown Sacramento

Villages along the Sacramento and American rivers include *Pujune*, *Momol*, *Sahmah*, *Demba*, *Yamahepu*, and *Sa'cum*. *Pujune* is located on the north side of the American River, about one-quarter mile east of its confluence with the Sacramento River. *Momol* is located on the south side of the American River, opposite the village of *Pujune*. *Sahmah* is located the east side of the Sacramento River, south of its confluence with the American River. *Demba* is located on the south side of the Sacramento River about one-half mile east of the Interstate 80 bridge crossing over the river. *Yamahepu* is located on the north side of the American River near the Highway 160 bridge crossing over the river. *Sa'cum* is located at Cesar Chavez Park in Sacramento.

In addition, Tribes have identified lake *Wanoho Pakan* as culturally important. A lake, originally named *Wanoho Pakan* by Native American Tribes, formerly extended from 3rd Street to 5th Street and north of I Street; the area is now occupied by the Southern Pacific railroad depot. *Wanoho Pakan* was and continues to be a place of cultural significance and value to Tribes. Subsequent to Euroamerican settlement and development of Sacramento, *Wanoho Pakan* became known as Sutter Lake and later as China Slough (JCC 2020:4.4). The history of the lake after European settlement is further discussed in Section 3.2, "Cultural Resources."

The presence and distribution of the six villages and *Wanoho Pakan* indicate that the area encompassed by modern Sacramento was a landscape occupied and successfully used by Native Americans. Indeed, beyond any physical presence (e.g., archaeological sites and artifacts) of Native American occupation, the landscape is part of the history of Native

Americans in the Sacramento area. The development and change of the landscape over time tells a story important to and valued by the Native American community and also the history of Sacramento and the Central Valley (JCC 2020:6.5,6.7).

Records Searches and Consultation

Records Search

On August 7, 2020, a search of records concerning an eighth-mile radius around the project site was conducted at the North Central Information Center (NCIC), at California State University, Sacramento (SAC-20-117). The following information was reviewed:

- site records of previously recorded cultural resources,
- previous cultural studies,
- NRHP and CRHR,
- the California Historic Resources Inventory, and
- the Office of Historic Preservation Historic Properties Directory.

The records search revealed that four studies have been conducted within the project site and another 15 within the eighth-mile search radius. Within the project site, the review of existing information identified one built-environment resource, P-34-3292 (Station A building; discussed in Section 3.2, “Cultural Resources”), one indigenous archaeological site (P-34-2359), and one Tribal cultural landscape (P-24-5225). These resources are described below.

Sacred Lands File Search

In response to an August 4, 2020, request from the project team, NAHC disclosed the results of a Sacred Lands File search on August 6, 2020. The information is included as confidential in the project files. NAHC also stated that the Ione Band of Miwok Indians and the United Auburn Indian Community of the Auburn Rancheria (UAIC) should be contacted for more information.

Tribal Consultation

One comment letter regarding Tribal cultural resources was received in response to the Notice of Preparation (see Appendix A). NAHC requested AB 52 and SB 18 compliance information; SB 18 does not apply to the project because there is a no General Plan amendment associated with the project (which is the trigger for SB 18 compliance). Additionally, SB 18 is not a CEQA requirement and therefore is not discussed in this section. The AB 52 consultant process is described below.

On July 17, 2020, in compliance with AB 52 requirements, SMUD sent letters to the Ione Band of Miwok Indians, UAIC, and Wilton Rancheria; responses were received from all three. Because Tribal consultation involves the locations and details of sites, the specific details of the consultations are confidential pursuant to California law. A summary of events related to communication between the Tribes and SMUD is provided below:

- July 21, 2020: Wilton Rancheria replied to SMUD's letter indicating a desire to consult.
- July 28, 2020: SMUD and Wilton Rancheria have the first consultation meeting.
- August 6, 2020: Wilton Rancheria provided a map that identified areas considered to have a high likelihood of Tribal cultural resources.
- August 11, 2020: UAIC replied to SMUD's letter indicating a desire to consult, stating that known Tribal cultural resources are located in the vicinity of the project site, (including but not limited to P-34-2359). UAIC also identified *Wanoho Pakan* as a place of cultural significance; the lake and the surrounding area continue to be a sacred place to the Tribes.
- August 20, 2020: SMUD schedules a consultation meeting with UAIC. Tribe invites Ione Band of Miwok Indians, Wilton Rancheria, and Shingle Springs Band of Miwok Indians.
- September 14, 2020: Ione Band of Miwok Indians replied to SMUD's letter indicating a desire to consult, requesting copies of cultural resource assessments and records searches.
- September 16, 2020: Shingle Springs Band of Miwok Indians submitted a letter indicating a desire to consult.
- Multiple meetings with all 4 Tribes or individual Tribes, as requested by the Tribes, throughout August and September.
- Late September through October 2020: Development of a testing plan, in cooperation with the consulting Tribes, to better determine the location of potential Tribal cultural resources beneath the paved surface of the project site.
- November 2020 through March 2021: Due to safety considerations surrounding ground disturbance within an active and constrained substation, the testing plan has yet to be implemented, but a treatment plan is under development and will be provided to the Tribes for approval. No testing has occurred as of the publication of this Draft EIR.

Tribal Cultural Resources

Two Tribal cultural resources have been identified within the vicinity of the project area, indigenous archaeological resource P-34-2359, and P-34-5255, a Tribal cultural landscape.

P-34-2359 is an indigenous archaeological resource with multiple artifact types and features that was first identified in 2008 as part of a Sacramento Regional Transit District light rail extension project. This site is situated on the banks of what was once *Wanoho Pakan*. The known features of this site suggest it served primarily as a main gathering place for communal activities, some of which were ceremonial in nature. Dating based on obsidian hydration measurements, Carbon-14 readings, and time-sensitive shell beads and projectile points indicates that this site was used between 1,400 and 200 years ago (Tremaine 2008). Based on these dates as well as the diversity of time-sensitive artifacts and type of features, P-34-2359 was recommended as eligible for the NRHP and CRHR and is therefore considered an archaeological resource for the purposes of CEQA (P-34-2359 is evaluated as an archaeological resource in Section 3.2, “Cultural Resources”). Consultation with the Wilton Rancheria, UAIC, Ione Band of Miwok, and Shingle Springs Band of Miwok Indians for the project has also identified P-34-2359 as a Tribal cultural resource.

P-34-5225 was identified as part of the NCIC records search and is described as a Tribal cultural landscape. According to the documentation, this Tribal cultural landscape is a culturally significant natural landscape associated with the cultural practices and beliefs of the Nisenan and Plains Miwok. It is identified by contemporary Nisenan as *Hoyo Sayo/Tah Sayo* and by contemporary Plains Miwok as *Wake-ce/Waka-Ly*. Geographically, this landscape is quite broad, encompassing what is considered the entirety of the Lower Sacramento River (south of Shasta Dam). The setting (landscape), while it has been heavily altered over the past century, still retains enough of the character-defining elements (waterways, tule, fisheries, and other wildlife) to convey the significance of this resource and a sense of continuity for living descendants. P-34-5255 has been evaluated as appearing eligible for NRHP- and CRHR-listing, and therefore is a Tribal cultural resource for the purposes of CEQA under PRC 21074.

3.1.3 Environmental Impacts and Mitigation Measures

Thresholds of Significance/Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the project would result in a potentially significant impact on cultural resources if it would:

- disturb any human remains, including those interred outside of dedicated cemeteries; or
- cause a substantial adverse change in the significance of a Tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that

is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe.

Analysis Methodology

Information related to Tribal cultural resources is based on findings reported in the NAHC Sacred Lands File database search, the records search results (NCIC File Number SAC-20-117), as well as the results of Native American consultation under AB 52. The analysis is also informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources.

PRC Section 21074 defines "Tribal cultural resources" as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American [T]ribe" that are listed or determined eligible for listing in the CRHR, listed in a local register of historical resources, or otherwise determined by the lead agency to be a Tribal cultural resource.

For the purposes of this impact discussion, "historical resource" is used to describe historic-period, built-environment resources. Tribal cultural resources, which may qualify as "historical resources" pursuant to CEQA, are analyzed separately from built-environment historical resources.

Issues or Potential Impacts Not Discussed Further

All potential Tribal cultural resources issues identified in the significance criteria are evaluated below.

Impact Analysis

Impact 3.1-1: Cause a substantial adverse change in the significance of a Tribal cultural resource, including human remains.

The NCIC records search and consultation with Wilton Rancheria, UAIC, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians identified two Tribal cultural resources (P-24-5225 and P-34-2359) as described under AB 52. Because project-related ground-disturbing activities could result in damage to Tribal cultural resources, the project could cause a **potentially significant** impact.

As part of the 2013/2014 legislative session, AB 52 established a new class of resources under CEQA, Tribal cultural resources, and requires that lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation once the lead agency determines that the application for the project is complete. As detailed above, SMUD has been in consultation with four Native American Tribes: Wilton Rancheria, UAIC, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians. Consultation, combined with the NCIC records search, resulted in the identification of two Tribal cultural resources (P-24-5225 and P-34-2359). Additionally,

through consultation with UAIC, SMUD learned of and has acknowledged the importance of *Wanoho Pakan* and the area surrounding the lake to California Native American Tribes.

P-34-5225 is a Tribal cultural landscape identified by contemporary Nisenan as *Hoyo Sayo/Tah Sayo* and contemporary Plains Miwok as *Wake-ce/Waka-Ly*. The Tribal cultural resource is described as "a landscape encompassing waterways, tule habitat, fisheries, and other wildlife" (Tremaine 2018). Because the project site is developed, the project would not alter these types of characteristics. The project would not introduce new elements into the landscape, such as ones that could cause a new break in continuity of the landscape, or audible or visual intrusions. Additionally, no Tribe expressed concern related to this resource during the consultation period.

P-25-2359 was identified during consultation with the Tribes resulted as a Tribal cultural resource. P-34-2359 was recommended as eligible for the NRHP and CRHR and is a significant Tribal cultural resource because of its use as a dwelling and ceremonial area for Tribal members. Consultation between SMUD and the Tribes remains ongoing; because the exact boundaries of P-34-2359 are unknown, the discussion has included the potential preparation of a treatment plan for work done adjacent to the site. While a testing plan to determine the boundaries of P-34-2359 was discussed, because the project site is an active, electrified substation, it was determined that testing is not feasible until the substation has been safely decommissioned.

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Section 7050.5 and California PRC Section 5097. Because there are two Tribal cultural resources in the immediate vicinity of the project site, any Native American human remains discovered would be considered part of the Tribal cultural resource. Therefore, a burial treatment agreement will be incorporated into the overall treatment plan. In addition to detailing the procedures required under California law, the burial treatment agreement will also require SMUD to contact the appropriate Native American Tribe if human remains are encountered during project implementation.

Implementation of the project would involve construction and excavation activities associated with decommissioning Station A, the installation of new equipment in the yard; and the erection of a canopy structure (see Chapter 2, "Project Description"). Although the project site is developed and past construction activities may have damaged or removed any subsurface elements, research in the area has demonstrated there is the potential presence of subsurface resources, including artifacts, features, and human remains that would qualify as Tribal cultural resources where there has been less ground disturbance or where native soils could potentially still be intact. Components of the project that require earth-moving and excavation may disturb or destroy any previously undisturbed and significant Tribal cultural resources or deposits. Therefore, the potential impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 3.1-1a: Prepare and implement a treatment plan.

Before ground disturbance associated with the project, SMUD shall, in cooperation with UAIC, Wilton Rancheria, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, finalize a treatment plan specific to the site. The treatment plan shall include, but is not limited to:

- testing,
- excavation strategy,
- research design,
- Tribal monitoring,
- resource significance assessment methods,
- discovery, preservation, and evaluation methods,
- a burial treatment agreement,
- reporting requirements, and
- health and safety procedures.

The testing portion of the treatment plan shall be implemented once Station A has been safely decommissioned; if resources are discovered during testing, the treatment plan would continue to be implemented throughout ground disturbing activities on the project site.

Mitigation Measure 3.1-1b: Prepare and implement worker cultural resources awareness and respect training program.

A cultural resources respect training program will be provided to all construction personnel active on the project site prior to implementation of earth moving activities. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the cultural resources awareness and respect training program in coordination with a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists. The program will include relevant information regarding sensitive Tribal cultural resources, including protocols for resource avoidance, applicable laws regulations, and the consequences of violating them. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any find of significance to Native Americans and protocols, consistent, to the extent feasible, with Native American Tribal values.

Mitigation Measure 3.1-1c: Memorialize the Tribal cultural values of the project area through public education and awareness.

To acknowledge the importance of the project area, particularly the area surrounding *Wanoho Pakan,* to California Native American Tribes, SMUD shall implement the following additional measures, regardless of whether Tribal cultural deposits related to P-34-2359 are encountered during project implementation:

1. In coordination with UAIC, Wilton Rancheria, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, SMUD shall develop a program with the American River College Native American Resource Center to benefit Native American students by enhancing areas of need or potential and shall support the program with a financial contribution. The contribution shall begin in 2021 and span a 3-year period. The program and contribution will be developed with the American River College Native American Resource Center.

2. In coordination with UAIC, Wilton Rancheria, Ione Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, SMUD shall commission a piece of art or other appropriate monumentation to represent the Tribal cultural values of the project area. The art piece could be in the form of a mural, sculpture, informative plaque, or other representation agreed to by the Tribes.

Significance after Mitigation

Implementation of Mitigation Measures 3.1-1a and 3.1-1b would reduce potential Tribal cultural resource impacts associated with the project, but not to a less-than-significant level because the possibility remains that excavation activities might not be able to avoid impacting significant Tribal cultural resources. Implementation of Mitigation Measure 3.1-3c would provide for ongoing education regarding the cultural values of the project area, in accordance with Tribal wishes, and would support the ongoing cultural history through education and awareness; however, this mitigation measure does not reduce potential Tribal cultural resource impacts associated with the project. The potential impact would be **significant and unavoidable**.

Impact 3.1-2: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to Tribal cultural resources including human remains.

The Station H Substation project, in combination with other cumulative development in the area, could result in impacts to Tribal cultural resources in the area. Even with the implementation of project-specific mitigation measures, the potential remains for indigenous archaeological and tribal cultural resources to be damaged, and as a result, the project's potential contribution would remain cumulative considerable. Potential impacts would be **significant**.

The cumulative context for the analysis of Tribal cultural resources considers a broad regional system of which the resources are a part. The cumulative context for Tribal cultural resources is the former territory of the Nisenan and Plains Miwok.

Because all significant Tribal cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant cultural resources, all adverse effects erode a dwindling resource base. Tribal cultural systems are represented by the total inventory of all sites and other remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of Tribal cultural resources, rather than on a single project or parcel boundary.

The historical lands of the Nisenan and Plains Miwok people have been affected by development since the early 1800s as part of Spanish settlement and missionization and through the steady influx of nonnative people during the 1850s Gold Rush. Development of the Nisenan and Plains Miwok lands continued with the completion of the Central Pacific Railroad in 1862 and continued expansion of railroad operations through the early 1900s. Residential growth increased after World War I and then greatly intensified after World War II. These activities have resulted in an existing significant adverse effect on Tribal cultural resources, including Native American remains. Cumulative development continues to contribute to the disturbance and loss of cultural resources.

Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would make projects infeasible, and for this reason the cumulative effects of past and present projects in the City of Sacramento could result in a potentially significant cumulative impact on Tribal cultural resources.

Even with implementation of Mitigation Measures 3.1-1a through 3.1-1c and compliance with existing policies and regulations, the project, and presumably some reasonably foreseeable future projects, would contribute to an ongoing significant cumulative loss and degradation of Tribal cultural resources, including Native American human remains. Therefore, because implementation of the project could result in an adverse change to identified tribal cultural resources and indigenous archaeological resources, the project would be considered cumulatively considerable with respect to the potential cumulative loss and degradation of tribal cultural resources in the area.

Because the project's contribution to the potential cumulative impact on Tribal cultural resources including human remains in the area would be considered cumulatively considerable, potential cumulative impacts would be considered **significant**.

Mitigation Measures

No additional feasible mitigation is available to reduce the project's potential contribution to less than cumulatively considerable.

Significance after Mitigation

Implementation of Mitigation Measures 3.1-1a and 3.1-1b would reduce potential project-specific impacts to Tribal cultural resources, but not to a less-than-significant level because the possibility remains that excavation activities might not be able to avoid impacting any significant Tribal cultural resources. Mitigation Measure 3.1-1c would provide for ongoing education and awareness, however, this mitigation measure does not reduce potential Tribal cultural resource impacts associated with the project. No additional feasible mitigation is available to reduce the project's contribution to less than cumulative considerable. Potential impacts would remain **significant and unavoidable**.

3.2 Cultural Resources

This section analyzes and evaluates the potential impacts of the project on known and unknown cultural resources. Although impacts related to human remains are typically analyzed in a cultural resources section, unanticipated discovery of human remains in the project area may potentially be Native American and would be considered a Tribal cultural resource, impacts associated with Tribal cultural resources are discussed in Section 3.1, "Tribal Cultural Resources."

Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include prehistoric resources and historic-period resources. Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-period physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical (or built-environment) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes. A cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

One comment letter regarding cultural resources was received in response to the Notice of Preparation (see Appendix A). The comment was received from a member of the public, expressing concern related to possible cultural resources near the historic China Lake (the lake formerly extended from 3rd Street to 5th Street and north of I Street; the area is now occupied by the Southern Pacific depot). The discovery of potential cultural resources is evaluated below.

3.2.1 Regulatory Setting

Federal

National Register of Historic Places

The National Register of Historic Places (NRHP) is the nation's master inventory of known historic properties. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1. The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);

2. It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and

3. It possesses at least one of the following characteristics:

   Criterion A — Is associated with events that have made a significant contribution to the broad patterns of history (events).

   Criterion B — Is associated with the lives of persons significant in the past (persons).

   Criterion C — Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).

   Criterion D — Has yielded, or may be likely to yield, information important in prehistory or history (information potential).

A project is considered to have a significant impact when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. These seven aspects of integrity are described as:

- **Location.** Integrity of location refers to whether a property remains where it was originally constructed or was relocated.

- **Design.** Integrity of design refers to whether a property has maintained its original configuration of elements and style that characterize its plan, massing, and structure. Changes made after original construction can acquire significance in their own right.

- **Setting.** Integrity of setting refers to the physical environment surrounding a property that informs the characterization of the place.

- **Materials.** Integrity of materials refers to the physical components of a property, their arrangement or pattern, and their authentic expression of a particular time period.

- **Workmanship.** Integrity of workmanship refers to whether the physical elements of a structure express the original craftsmanship, technology and aesthetic principles of a particular people, place, or culture at a particular time period.

- **Feeling.** Integrity of feeling refers to the property's ability to convey the historical sense of a particular time period.

- **Association.** Integrity of association refers to the property's significance defined by a connection to a particular important event, person, or design.

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee consideration in planning for federal or federally-assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

The National Register Bulletin series was developed to assist evaluators in the application of NRHP criteria. For example, National Register Bulletin #36 provides guidance in the evaluation of archaeological site significance. If a property cannot be placed within a particular theme or time period, and thereby lacks "focus," it will be unlikely to possess characteristics which would make it eligible for listing in the NRHP. Evaluation standards for linear features (such as roads, trails, fence lines, railroads, ditches, and flumes) are considered in terms of four related criteria that account for specific elements that define engineering and construction methods of linear features: (1) size and length, (2) presence of distinctive engineering features and associated properties, (3) structural integrity, and (4) setting. The highest probability for NRHP eligibility exists in the intact, longer segments, where multiple criteria coincide.

Secretary of the Interior's Standards

The "Secretary of the Interior's Standards for the Treatment of Historic Properties" (Secretary's Standards), codified in 36 CFR 67, provide guidance for working with historic properties. The Secretary's Standards are used by lead agencies to evaluate proposed rehabilitative work on historic properties. The Secretary's Standards are a useful analytic tool for understanding and describing the potential impacts of proposed changes to historic resources. Projects that comply with the Secretary's Standards benefit from a regulatory presumption that they would not result in a significant impact to a historic resource. Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse change in the significance of a historic property.

In 1992, the Secretary's Standards were revised so they could be applied to all types of historic resources, including landscapes. They were reduced to four sets of treatments to guide work on historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.

- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.

- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.

- **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

The "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings" (Guidelines) illustrate how to apply the four treatments detailed above to historic properties in a way that meets the Secretary's Standards. The Guidelines are advisory, not regulatory. The purpose of the Guidelines is to provide guidance to historic building owners and building managers, preservation consultants, architects, contractors, and project reviewers prior to beginning work. They address both exterior and interior work on historic buildings. There are four sections in the Guidelines, each focusing on one of the four treatment Standards: Preservation, Rehabilitation, Restoration, and Reconstruction. Each section includes one set of Standards with accompanying Guidelines that are to be used throughout the course of a project.

State

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are also listed in the California Register of Historical Resources (CRHR). The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historical resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a historical resource must meet one of the above criteria and retain integrity to be listed in the CRHR. The CRHR uses the same seven aspects of integrity used by the NRHP.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "historical resources," and "unique archaeological resources." Pursuant to PRC Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 requires agencies to determine whether projects would have effects on unique archaeological resources.

Historical Resources

"Historical resource" is a term with a defined statutory meaning (PRC Section 21084.1; State CEQA Guidelines Sections 15064.5[a] and [b]). Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

1) A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (PRC Section 5024.1).

2) A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3) Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).

4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Unique Archaeological Resources

CEQA also requires lead agencies to consider whether projects will affect unique archaeological resources. PRC Section 21083.2(g) states that "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly

demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Local

City of Sacramento 2035 General Plan

The following policies are considered relevant to the project and cultural resources in the vicinity of the project:

- **Policy HCR 2.1.1:** Identification. The City shall identify historic and cultural resources, including individual properties, districts, and sites (e.g., archaeological sites), to ensure adequate protection of these resources.

- **Policy HCR 2.1.2:** Applicable Laws and Regulations. The City shall ensure compliance with City, State, and Federal historic preservation laws, regulations, and codes to protect and assist in the preservation of historic and archaeological resources, including the use of the California Historical Building Code as applicable. Unless listed in the Sacramento, California, or National registers, the City shall require discretionary projects involving resources 50 years and older to evaluate their eligibility for inclusion on the California or Sacramento registers for compliance with the California Environmental Quality Act.

- **Policy HCR 2.1.5:** National, California, and Sacramento Registers. The City shall support efforts to pursue eligibility and listing for qualified resources including historic districts and individual resources under the appropriate National, California, or Sacramento registers.

- **Policy HCR 2.1.10:** Early Project Consultation. The City shall minimize potential impacts to historic and cultural resources by consulting with property owners, land developers, and the building industry early in the development review process.

- **Policy HCR 2.1.11:** Compatibility with Historic Context. The City shall review proposed new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context. The City shall pay special attention to the scale, massing, and relationship of proposed new development to surrounding historic resources.

- **Policy HCR 2.1.15:** Demolition. The City shall consider demolition of historic resources as a last resort, to be permitted only if rehabilitation of the resource is not feasible, demolition is necessary to protect the health, safety, and welfare of its residents, or the public benefits outweigh the loss of the historic resource.

- **Policy HCR 2.1.16:** Archaeological & Cultural Resources. The City shall develop or ensure compliance with protocols that protect or mitigate impacts to archaeological and cultural resources including prehistoric resources.

- **Policy HCR 2.1.17:** Preservation Project Review. The City shall review and evaluate proposed development projects to minimize impacts on identified historic and cultural resources, including projects on Landmark parcels and parcels within Historic Districts, based on applicable adopted criteria and standards.

Sacramento Planning and Development Code Chapter 17.604

Chapter 17.604 (Historic Preservation) of the City's Planning and Development Code includes provisions for the identification of significant historic, prehistoric and cultural resources, structures, districts, sites, landscapes, and properties within the City. This chapter also includes mechanisms and procedures to protect and encourage the preservation of the city's historic and cultural resources, as well as established the preservation commission and the responsibilities of the City's Preservation Director.

3.2.2 Environmental Setting

Regional Prehistory

California archaeology can be described as a series of patterns—an essentially non-temporal, integrative cultural unit–the way of general life shared by people within a given geographic region. The archaeology of Sacramento County is included within the broad framework established by archaeologists for the Sacramento Valley. The taxonomic framework of the Sacramento Valley has been described in terms of archaeological patterns. A pattern is a general mode of life characterized archaeologically by technology, particular artifacts, economic systems, trade, burial practices, and other aspects of culture.

Although human occupation may extend back 10,000 years or more, reliable evidence of such an early human presence is lacking. Early archaeological sites bearing evidence of Paleo-Indian populations may be present in the Sacramento Valley but likely are buried deeply under the alluvium (SMUD 2015).

The Paleo-Indian Period (12,000 to 8,000 Before Present [BP]) saw the first demonstrated entry and spread of humans into California. Known sites are situated along lake shores, and a developed milling tool technology may have existed at this time. The social units were not heavily dependent on exchange of resources, with exchange activities occurring on an ad hoc, individual basis. Most resources were acquired when the group changed habitats. Characteristic artifacts include fluted projectile points and chipped stone crescents (SMUD 2015).

The beginning of the Lower Archaic Period (8,000 to 5,000 BP) coincides with that of the middle Holocene climatic change to generally drier conditions that brought about the drying up of the pluvial lakes. Subsistence appears to have been focused on the consumption of plant foods more than those obtained by hunting. Settlement appears to have been semi-sedentary, with little emphasis on wealth. Most tools were manufactured from local materials, and exchange remained on an ad hoc basis. Distinctive artifact types are large dart points, the milling slab, and handstones (SMUD 2015).

The Middle Archaic Period (5,000 to 3,000 BP) began at the end of mid-Holocene climatic conditions, when the climate became similar to present-day conditions. Cultural change primarily occurred in response to environmental technological factors. Hunting remained an important source of food. Sedentism appears to have more fully developed, and a general population growth and expansion occurred. Little evidence exists for development of regularized exchange relations. Artifacts diagnostic of this period include the bowl mortar and pestle, the first documented use of these implements, and the continued use of large projectile points (SMUD 2015).

Growth of sociopolitical complexity marks the Upper Archaic Period (3,000 to 1,500 BP). The development of status distinctions based on wealth is well documented. Group-oriented religions emerged and may have been the origins of the Kuksu religious system at the end of the period. Greater complexity of exchange systems occurred, with evidence of regular, sustained exchanges between groups. Shell beads gained in significance, as possible indicators of personal status and important trade items. This period retained the large dart points in different styles, but the bowl mortar and pestle replaced the milling stone and handstone throughout most of the state (SMUD 2015).

Several technological and social changes distinguish the Emergent Period (1,500 to 200 BP). The bow and arrow were introduced, ultimately replacing dart points. Territorial boundaries between groups became well established and may closely resemble those documented in the ethnographic literature. Exchange of goods between groups became more regularized with more material, including raw materials, entering into the exchange networks. In the latter portion of this period (500 to 200 BP), exchange relations become highly regularized and sophisticated. The clam disk bead became a monetary unit for exchange and increasing quantities of goods moved greater distances. During the latter decades of this period, large-scale Euro-American-related impacts, such as illnesses, on Native American groups took place (SMUD 2015).

Historic Setting

Sacramento Development

John Sutter, born a citizen of Switzerland, was awarded a land grant by the Mexican government in 1834. His party disembarked at the site of present-day Sutter's Landing Park on 28th Street on August 12, 1839. Sutter had constructed an adobe fort, a settlement he called New Helvetia, by 1841 (now Sutter's Fort State Park on L and 27th streets). California was ceded as a territory to the United States following the end of the Mexican-American War in 1848. During that time, the steadily growing population of New

Helvetia expanded into the surrounding countryside. The Coloma lumber mill built by one of Sutter's employees, James Marshall, was originally planned to support Sutter's conceptual city, Sutterville. The mill yielded gold instead. News of the gold could not be kept secret, and word reached San Francisco and the rest of the world (ICF 2017).

Sacramento incorporated in 1849 and served as an important gateway to California's gold fields. The Central Pacific Railroad of California was formed in 1861, and groundbreaking commenced at Front and K Streets in 1863. The railroad had a tremendous impact on Sacramento and enabled easier transport of materials and goods in and out of the growing city. In 1894, Sacramento Electric Power and Light Company constructed its powerhouse at the corner of 6th and H Streets. The building, now known as Station A, received the first transmission of electricity from the Folsom Power House on July 13, 1895, making it the first and largest distribution point for a major electrical system in a large California city (SMUD 2015).

Sacramento continued to grow and prosper in the twentieth century. By 1925, the Central Pacific Railroad operations had expanded extensively and included spur lines that extended north of H Street and paralleled 7th Street. After World War II, Sacramento's population increased dramatically, and development stretched beyond the city limits. As the suburban areas of Sacramento expanded, the city's downtown rapidly declined. In 1950, the city established the Sacramento Redevelopment Agency, which started proposing redevelopment plans for Sacramento's downtown. By 1961, 15 blocks of dilapidated buildings were demolished. Government office buildings were constructed in the downtown's Capitol Mall in the early 1950s. By 2010, Sacramento encompassed more than 92 square miles and had more than 466,000 residents (SMUD 2015).

Sutter Lake (*Wanoho Pakan*)

As described in Section 3.1, "Tribal Cultural Resources," *Wanoho Pakan* is an important part of Tribal history. The lake is also an important feature in post-European contact history of the area. Until 1911, all freight and passenger trains arriving in what is now downtown Sacramento were conveyed across a wooden trestle bridge at H Street that served a grand wooden station built by the Central Pacific Railroad in the 1860s; the station was directly north of the large shop buildings, located east of present-day Interstate 5. The area south of the current shop buildings was largely a swampy lake which extended to just north of I Street; the area is now occupied by the current train station. European settlers called the lake Sutter's Lake while in pristine condition up through the 1860s, but after the construction of the railroad station and shop buildings, a dramatic deterioration of the lake began. After neglectful dumping of refuse from railroad operations, its quality had become a severe public nuisance to residents of the city and was then referred to as China Slough for the Chinese community that had established itself along its banks at the edge of I Street. This polluted water feature was an unwelcoming gateway to the city, and newspapers of the time chronicle the pleas from the public to officials of the city and the Southern Pacific Railroad to fill in the water body and build a new station fitting the capitol city. Finally, in 1908, the railroad began dredging

sand from the American River to fill the water body to ground level, a process that took over two years to complete (City of Sacramento 2020).

Development of SMUD

On July 2, 1923, SMUD was voted into creation by the people of Sacramento County. However, vicious and prolonged litigation between the utility and Pacific Gas and Electric Company (PG&E) over the next 25 years delayed the delivery of power by SMUD to local customers. In 1946, PG&E's appeal was finally denied, ending the long battle, and power delivery began on December 31, 1946. In the years directly following, SMUD focused on modernizing the outdated and neglected power grid and facilities it inherited from PG&E. Meanwhile, the population of Sacramento continued to grow, creating a continuous need for reliable power delivery as the population doubled between 1946 and 1956. Thus, in the 1950s SMUD voted to build new headquarters to accommodate its burgeoning staff of over 400 workers. The local firm of Dreyfuss and Blackford was chosen to design the site, located on 15 acres below Folsom Boulevard in East Sacramento, and a 160,000 square foot International style building with wooded landscaping was complete by 1959 (SMUD 2017).

In the years following the completion of SMUD Headquarters, the utility continued to deliver power to an increasing number of customers in the expanding Sacramento area. In 1955, voters approved a revenue bond to finance the Upper American River Project, for hydroelectric power generation. When the Upper American River Project was completed in the 1960s, it generated electricity for 250,000 customers. SMUD began to utilize nuclear power at its Rancho Seco plant, which began construction in 1969 and began producing nuclear generated energy in 1974. However, the Arab oil embargo, a prolonged California drought and a multiple-month service shutdown at Rancho Seco challenged SMUD to provide reliable power from the plant. The company worked to secure power sources and attempted early innovations in energy savings. It emerged from the crisis with a larger customer base than at the beginning of the crisis; Folsom voted to transfer their energy needs to SMUD in 1984. By the end of the twentieth century, SMUD was serving more than 500,000 customers (SMUD 2015; SMUD 2017).

Records Searches and Known Resources

On August 7, 2020, a search of records concerning an eighth-mile radius around the project site was conducted at the North Central Information Center (NCIC), at California State University, Sacramento (SAC-20-117). The following information was reviewed:

- site records of previously recorded cultural resources,
- previous cultural studies,
- NRHP and CRHR,
- the California Historic Resources Inventory, and
- the Office of Historic Preservation Historic Properties Directory.

The records search revealed that four studies have been conducted within the project site and another 15 within the eighth-mile search radius. The review of existing information identified one built environment resource, P-34-3292 (Station A building), within the project site, one prehistoric (indigenous) archaeological site (P-34-2359), and one Tribal cultural landscape (P-24-5225). Resource P-34-3292 is described below; because P-34-2359 is a prehistoric archaeological site, the resource is described below and is also addressed in Section 3.1, "Tribal Cultural Resources"; because P-24-5225 is a Tribal cultural landscape, it is only addressed in Section 3.1.

Other documents examined include the archaeological testing results report related to the 2015 IS/MND completed for the Station A Relocation and Rebuild Project. This report revealed that five historic-period archaeological features were found during monitoring. Evaluation of the features concluded that none of them appeared to be eligible for CRHR-listing, and therefore they are not considered resources for the purpose of CEQA.

Historical Resources

P-34-3292 is the Station A (Old Folsom Powerhouse-Sacramento) building. Constructed in 1894 by the Sacramento Electric Power and Light Company, the building received the first transmission of electricity from the Folsom Power House on July 13, 1895. The original equipment that was used for the first transmission of electricity was upgraded and removed in the 1950s. The 1950s equipment also was upgraded in the subsequent years. By the 1980s, the Station A building housed a 12kV/208V station service transformer and distribution center, a DC station battery system, and various other electrical systems. All this equipment was removed post-1996. Currently, the building is used for storage. The building is also important for its Classical Revival design. The character-defining features of the resource include its false parapet, angled corner, arched entrance, and arched bays (SMUD 2015).

The setting for the Station A building has changed over time. Historically, the area north of the building generally was industrial and was occupied by the railroad. Today, it is used as a parking lot, and most railroad-related features are gone. A modern residential and government-related building also is in the immediate vicinity of the Station A building. Because of these changes, the Station A building no longer retains integrity of setting, feeling, and association, but it does retain integrity of location, design, workmanship, and materials, and it continues to convey its significance as the site of the first and largest distribution point for a major electrical system in a large California city and as an important example of Classical Revival architecture in Sacramento (SMUD 2015).

The Station A building is a California Historical Landmark (No. 633-2), was determined to be eligible for the NRHP in 1999, and thus also was listed on the CRHR. Therefore, the building is a historical resource for the purposes of CEQA.

Archaeological Resources

P-34-2359 is a prehistoric archaeological resource with multiple artifact types and features that was first identified in 2008 as part of a Sacramento Regional Transit District light rail extension project. This site was situated on the banks of *Wanoho Pakan*. The features of this site suggest it served primarily as a main gathering place for communal activities, some ceremonial in nature. Dating based on obsidian hydration measurements, Carbon-14 readings, coupled with certain types of shell beads and projectile points indicates that this site was used between 1,400 and 200 years ago with the majority of the significant features dating to the transition period between the Upper Archaic and Emergent Periods, approximately 1,000 to 500 years ago (Tremaine 2008). The lack of clamshell disc beads in the buried objects is significant and restricts the use of the site to Phase I of the Emergent Period; this means the buried objects pre-date European contact, and it is likely this site was abandoned before European contact and settlement. Based on these dates as well as the diversity of time-sensitive artifacts and type of features, P-34-2359 was recommended as eligible for the NRHP and CRHR and is therefore considered an archaeological resource for the purposes of CEQA. Consultation with the Wilton Rancheria, United Auburn Indian Community of the Auburn Rancheria, Ione Band of Miwok, and Shingle Springs Band of Miwok Indians for the project, as described below, has also identified P-34-2359 as a Tribal cultural resource (discussed in Section 3.1, “Tribal Cultural Resources”)

3.2.3 Environmental Impacts and Mitigation Measures

Thresholds of Significance/Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the project would result in a potentially significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5 of the State CEQA Guidelines; or

- cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.

Analysis Methodology

The impact analysis for archaeological and historical resources is based on the records search results (NCIC File Number SAC-20-117). The analysis is also informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources.

PRC Section 21083.2(g) defines a “unique archaeological resource” as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following CRHR-related criteria: (1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public

interest in that information; (2) that it as a special and particular quality, such as being the oldest of its type or the best available example of its type; or (3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person. An impact on a resource that is not unique is not a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.5[c][4]). If an archaeological resource qualifies as a resource under CRHR criteria, then the resource is treated as a unique archaeological resource for the purposes of CEQA.

For the purposes of this impact discussion, "historical resource" is used to describe built-environment historic-period resources. Archaeological resources (both prehistoric [indigenous] and historic-period), which may qualify as "historical resources" pursuant to CEQA, are analyzed separately from built-environment historical resources.

Issues or Potential Impacts Not Discussed Further

All potential archaeological and historical resources issues identified in the significance criteria are evaluated below.

Impact Analysis

Impact 3.2-1: Change in the significance of a historical resource.

The Station A building has been identified as a historical resource. The project could include possible structural stabilization upgrades to the building. Additionally, construction-related groundborne vibration could result in damage to the buildings. Therefore, there would be a **potentially significant** impact on the historical resource.

As described previously, the Station A building (P-34-3292) is a California Historical Landmark (No. 633-2), was determined eligible for listing in the NRHP, and is listed in the CRHR for its significance as the site of the first and largest distribution point for a major electrical system in a large California city and as an important example of Classical Revival architecture in Sacramento. The original equipment that was used for the first transmission of electricity was upgraded and removed in the 1950s; currently, the building contains some 20th century equipment but is primarily used for storage. Additionally, as described previously, the Station A building no longer retains integrity of setting, feeling, and association, due to the change in setting from industrial and railroad uses to residential and office uses.

The project includes the removal and dismantling of the existing substation equipment, including protection and control equipment within the Station A building; the installation of new equipment in the yard; and a canopy structure is proposed to be located between the new Station H substation yard and the Station A building (see Chapter 2, "Project Description"). These activities would not alter the design or current use of the Station A building.

A structural integrity assessment of the building would be conducted as part of the project. Due to safety considerations associated with operation of an existing substation, such an assessment is not possible at this time. Depending on the results of the assessment, it is possible that structural stabilization upgrades might be required. These could include wall anchors, sheer walls, wall braces, epoxy crack injections, or tuck pointing. Depending on the location and level of structural stabilization needed, it is possible for these upgrades to affect the integrity of the Classical Revival design of the building, resulting in an adverse change in the significance of a historical resource.

Additionally, construction-related vibration, depending on the type and intensity of certain construction activities, could result in potential damage to the Station A building. Please see pages 71 through 73 of the Station H Substation Project IS (Appendix B) for a full discussion of the potential effect of vibration on the building. Therefore, although the project does not include alternation of the Station A building, because of the potential for structural damage this impact would be **potentially significant**.

Mitigation Measure 3.2-1a: Limit ground vibration during construction.

Implement Mitigation Measures 3.13-a: Implement measures to reduce ground vibration; and Mitigation Measure 3.13-b: Develop and implement a vibration control plan.

Mitigation Measure 3.2-1b: Comply with the Secretary of the Interior's Standards.

- For all interior repairs to the Station A building that do not alter the external visual appearance of the building, review by an architectural historian is not required.

- For minor exterior repairs to the Station A building that do not alter the visual appearance of the building—such as tuck pointing—if the repairs are conducted in compliance with the Secretary's Standards and consistent with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995), then review by an architectural historian is not required.

- For larger exterior repairs to the Station A building—such as external sheer walls—repairs shall be conducted in compliance with the Secretary's Standards and consistent with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995), and an architectural historian shall be retained to confirm that the repairs do not result in a change to the design of the Station A building such that the building would no longer qualify as a historical resource.

Significance after Mitigation

Implementation of Mitigation Measure 3.2-1a requires SMUD and the design-build team to restrict phasing operations, locate equipment as far from the Station A building as feasible, and prepare and implement a vibration control plan. This plan will refine appropriate setback distances, require SMUD to conduct pre-construction surveys, require the construction contractor to monitor and document all pile drilling-generated vibration levels at sensitive receptors, and identify other measures and/or alternative methods of construction to reduce vibration if needed to ensure that applicable thresholds are not exceeded. Implementation of this measure would ensure the integrity of the existing historical resource is maintained during construction and that construction vibration does not result in irreparable structural damage. Implementation of Mitigation Measure 3.2-1b requires compliance with the Secretary's Standards; projects that comply with the Secretary's Standards benefit from a regulatory presumption that they would not result in a significant impact to a historic resource. Thus, this impact would be reduced to a **less-than-significant** level.

Impact 3.2-2: Change the significance of a historic-period archaeological resource.

Results of the records search for the project site did not indicate any known historic-period archaeological sites or materials. However, project-related ground-disturbing activities could result in the discovery or damage of undiscovered historic-period archaeological resources. This would be a **potentially significant** impact.

The NCIC records search results did not reveal any known historic-period archaeological sites within the project site. However, the area has historically been used by the railroad, Chinese community, and industrial operations. Therefore, there is the potential that ground disturbance during project construction could encounter previously undiscovered or unrecorded historic-period archaeological sites and materials. These activities could damage or destroy historic-period archaeological resources. This would be a **potentially significant** impact.

Mitigation Measure 3.2-2: Halt ground-disturbing activity upon discovery of historic-period archaeological features.

In the event that a historic-period archaeological site (such as concentrated deposits of bottles or bricks with makers marks, amethyst glass, or other historic refuse) is uncovered during grading or other construction activities, all ground-disturbing activity within 100 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. SMUD will be notified of the potential find and a qualified archeologist shall be retained to investigate its significance. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either a historical resource or a unique archaeological resource), the archaeologist shall work with SMUD to

follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If artifacts are recovered from significant historic-period archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results.

Significance after Mitigation

Implementation of Mitigation Measure 3.2-2 would reduce impacts associated with historic-period archaeological resources to a **less-than-significant** level by requiring the performance of professionally accepted and legally compliant procedures in the event of a discovery, as well as the protection of any previously undocumented significant historic-period archaeological resources.

Impact 3.2-3: Change the significance of a prehistoric archaeological resource.

Results of the NCIC records search identified P-34-2359 as a prehistoric archaeological resource. Because project-related ground-disturbing activities could result in damage to this resource, this would be a **potentially significant** impact.

P-34-2359 is a significant prehistoric archaeological resource containing time-sensitive artifacts and features important as part of history and to living peoples. As described previously, based on the dates of the site as well as the diversity of time-sensitive artifacts and types of features, P-34-2359 was recommended as eligible for the NRHP and CRHR and is therefore considered an archaeological resource for the purposes of CEQA. Consultation with culturally affiliated Tribes (as described in Section 3.1, “Tribal Cultural Resources”) resulted the potential preparation of a treatment plan for work done adjacent to the site. While a testing plan to determine the boundaries of P-34-2359 was discussed, the project site is an active, electrified substation, and it was determined that testing was not feasible for safety reasons prior to decommissioning of the substation.

Implementation of the project would involve construction and excavation activities associated with decommissioning Station A, the installation of new equipment in the yard, and the erection of a canopy structure (see Chapter 2, “Project Description”). Although the project site is developed and past construction activities may have damaged or removed any subsurface elements, research in the area has demonstrated there is the potential presence of subsurface resources, including artifacts and features that would qualify archaeological resources where there has been less ground disturbance or where native soils, if any, are still intact. Components of the project that require earth-moving and excavation may disturb or destroy previously undisturbed and significant prehistoric archaeological deposits. Therefore, the impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 3.2-3: Identify and protect prehistoric archaeological resources.

Implement Mitigation Measures 3.1-3a: Prepare and implement a treatment plan; and Mitigation Measure 3.1-3b: Prepare and implement worker cultural resources awareness and respect training program.

Significance after Mitigation

Implementation of Mitigation Measure 3.2-3 would reduce impacts associated with prehistoric archaeological resources to a **less-than-significant** level by requiring the preparation of a data recovery plan, implementation of a worker cultural resources awareness and respect program, performance of professionally accepted and legally compliant procedures in the event of a discovery, as well as the protection of any previously undocumented significant prehistoric archaeological resources. While mitigation was unable to reduce impacts to Tribal cultural resources, data recovery is considered acceptable mitigation for archaeological resources.

Impact 3.2-4: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to cultural resources.

The Station H Substation project, in combination with other cumulative development in the area, could result in impacts to cultural resources in the area. Through the implementation of project-specific mitigation measures, the contribution of the project would not be cumulatively considerable with respect to historical resources and archaeological resources. Potential impacts would be **significant**.

The cumulative context for the cultural resources analysis considers a broad regional system of which the resources are a part. The cumulative context for historical resources and historic-period archaeological resources is the City of Sacramento where common patterns of historic-era settlement have occurred over roughly the past two centuries. The cumulative context for archaeological resources is the Sacramento Valley, where archaeologists have developed a taxonomic framework describing patterns characterized by technology, particular artifacts, economic systems, trade, burial practices, and other aspects of culture.

Because all significant cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant cultural resources, all adverse effects erode a dwindling resource base. The loss of any one archaeological site could affect the scientific value of others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather than on a single project or parcel boundary.

The Sacramento Valley has been affected by development since the early 1800s as part of Spanish settlement and missionization and through the steady influx of nonnative people during the 1850s Gold Rush. Development of the Sacramento Valley continued with the completion of the Central Pacific Railroad in 1862, continued expansion of agricultural land, and the development of the cities of Sacramento, Chico, Redding, Elk Grove, Roseville, Vacaville, Davis, Folsom, and West Sacramento. Residential growth increased after World War I and then greatly intensified after World War II. These activities have resulted in an existing significant adverse effect on archaeological resources Cumulative development continues to contribute to the disturbance and loss of cultural resources.

Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would make projects infeasible, and for this reason the cumulative effects of past and present projects in the City of Sacramento and the Sacramento Valley could result in a potentially significant cumulative impact on cultural resources (archaeological and historical).

With implementation of Mitigation Measure 3.2-1a, potential adverse effects to historical resources (the Station A building) associated with construction-related vibration would be avoided by ensuring the integrity of the existing historic resource is maintained during construction and that construction vibration does not result in irreparable structural damage. With Implementation of Mitigation Measure 3.2-1b, potential adverse effects to the Station A building associated with possible stabilization upgrades would be avoided by requiring compliance with the Secretary's Standards. Therefore, implementation of the project would not contribute to a cumulative loss of historical resources.

Similarly, implementation of Mitigation Measures 3.2-2 (historic-period archaeological resources) and 3.2-3 (prehistoric archaeological resources) would ensure that the project's contribution to cumulatively significant archeological resource impacts would not be considerable by requiring the preparation of a data recovery plan, requiring construction work to cease in the event of an accidental find and the appropriate treatment of discovered resources, in accordance with pertinent laws and regulations. With implementation of these mitigation measures, the proposed project's contribution to archeological resource impacts would be offset.

Further, cumulative development would be required to implement similar mitigation to avoid/reduce impacts to cultural resources. Therefore, the proposed project would not have a considerable contribution to any significant cumulative impact related to historical or archaeological resources. Impacts would be **less than significant**.

Mitigation Measures

See Mitigation Measures 3.2-1a, 3.2-1b, 3.2-2, and 3.2-3. No additional mitigation is required.

4 Other CEQA Sections

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the environmental impact report (EIR) must also identify the following: (1) significant environmental impacts of the project, (2) significant environmental effects that cannot be avoided if the project is implemented, (3) significant irreversible environmental changes that would result from implementation of the project, and (4) growth-inducing impacts of the project. Although growth inducement itself is not considered an environmental effect, it could potentially lead to foreseeable physical environmental effects, which are discussed under "Growth-Inducing Impacts" below.

4.1 Significant Unavoidable Impacts

Section 21100(b)(2)(A) of the State CEQA Guidelines provides that an EIR shall include a detailed statement setting forth "in a separate section: any significant effect on the environment that cannot be avoided if the project is implemented." Accordingly, this section provides a summary of significant environmental impacts of the project that cannot be mitigated to a less-than-significant level.

Sections 3.1 and 3.2 of this Draft EIR describes the potential environmental impacts of the project and recommend various mitigation measures to reduce impacts, to the extent feasible. After implementation of the recommended mitigation measures, most of the impacts associated with development of the project would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available or the mitigation measures available were not enough to reduce the project's impacts to a less-than-significant level. Note, this is only a summary of those impacts; it is important to review the discussions in Chapter 3 of this EIR to understand the full context of the impact determinations.

Impact 3.1-1: Change the significance of a Tribal cultural resource.

Impact 3.1-2: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to Tribal cultural resources.

4.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly,

> secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- the primary and secondary impacts would generally commit future generations to similar uses,
- the project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project,
- the project would involve a large commitment of nonrenewable resources, or
- the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the Station H Substation Project would result in the continued commitment of the project site to utility-related uses, removing the area from any other potential use. Restoration of the site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment by SMUD.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources as stated in Section 3.6, “Energy,” and Section 3.8, “Greenhouse Gas Emissions,” of the Initial Study (IS). Construction and operational activities related to the project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment. The use of these nonrenewable resources is expected to account for a minimal portion of the region’s resources and would not affect the availability of these resources for other needs within the region. Construction activities would not result in inefficient use of energy or natural resources. Construction contractors selected would use best available engineering techniques, construction and design practices, and equipment operating procedures. Long-term project operation would not result in substantial long-term consumption of energy and natural resources because the project would be designed using energy efficient technologies, as stated in Chapter 2, “Project Description.”

With respect to operational activities, as described in Section 3.6, “Energy,” and Section 3.8, “Greenhouse Gas Emissions,” of the IS, the project would generate minimal vehicle trips during operation associated with ongoing maintenance of the facility, which would

not be notably greater than the existing vehicle trips accessing the project site; therefore, the project would not generate any additional GHG emissions beyond existing conditions during operations as operational activities. These maintenance trips would be essential to ensuring that Station H be functional to supply energy to customers within the SMUD service area.

4.3 Growth-Inducing Impacts

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (Public Resources Code Section 21100[b][5]). Specifically, the State CEQA Guidelines (California Code of Regulations [CCR] Section 15126.2[d]) states that the EIR shall discuss the ways in which the project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this analysis are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, the EIR should discuss the characteristics of the project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the EIR must find that the project would foster (i.e., promote or encourage) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with the State CEQA Guidelines (CCR Section 15126.2[d]).

If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth fit the CEQA definition of "indirect" effects in the State CEQA Guidelines (CCR Section 15358[a][2]). These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Potential secondary effects of growth could include consequences – such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased traffic and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat – that are the result of growth fostered by the project.

4.3.1 Growth-Inducing Impacts of the Project

This analysis examines the following potential growth-inducing impacts related to implementation of the project and assesses whether these effects are significant and adverse:

1. foster population growth and construction of housing;

2. eliminate obstacles to population growth;

3. foster economic growth;

4. affect service levels, facility capacity, or infrastructure demand; and

5. encourage or facilitate other activities that could significantly affect the environment.

Implementation of the project would minimally foster short-term economic growth within the City of Sacramento as a result of new construction employment opportunities. The decommissioning of Station A is anticipated to begin in the second half of 2022 and would be completed by early 2023. The construction of Station H is anticipated to begin soon after the decommission of Station A and would be completed in 2024. During construction, the estimated peak level of construction workers at any given time is estimated to be approximately 30 workers and it would not be reasonable to expect that any construction workers would relocate to the project area for a temporary job. There would be no long-term operational employment opportunities associated with the project.

In conclusion, the project does not have the potential to stimulate the economy directly (by providing jobs) or indirectly (by creating a demand for local goods and services) in the region. Further, the project would not meaningfully affect employment or other growth in the region, given the size of the regional economy. Therefore, the project would not contribute to substantial population growth.

4.4 Environmental Justice Evaluation

4.4.1 Introduction

At present, there are no direct references to the evaluation of environmental justice (EJ) as an environmental topic in the Appendix G Environmental Checklist, CEQA statute, or State CEQA Guidelines; however, requirements to evaluate inconsistencies with general, regional, or specific plans (State CEQA Guidelines Section 15125[d]) and determine whether there is a "conflict" with a "policy" "adopted for the purpose of avoiding or mitigating an environmental effect" (Environmental Checklist Section XI[b]) can implicate EJ policies. As additional cities and counties comply with Senate Bill (SB) 1000 (2016), which requires local jurisdictions to adopt EJ policies when two or more general plan elements are amended, environmental protection policies connected to EJ will become more common.

"Environmental Justice" is defined in California law as the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (California Government Code Section 30107.3[a]). "Fair treatment" can be defined as a condition under which "no group of people, including racial, ethnic, or socioeconomic group, shall bear a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies" (EPA 2011).

SMUD created the Sustainable Communities Initiative, which encompasses the framework of EJ, to help bring environmental equity and economic vitality to all communities in SMUD's service area with special attention to historically underserved neighborhoods. The initiative focuses on the development of holistically sustainable neighborhoods through partnerships and collaboration. The goal of this effort is to ensure the advancement of prosperity in the Sacramento region regardless of zip code or socioeconomic status by focusing on equitable access to mobility, a prosperous economy, a healthy environment, and social well-being. To support the initiative, SMUD teams are working internally and with community partners to improve equitable access to healthy neighborhood environments, energy efficiency programs and services, environmentally friendly transit modes (including electric vehicles), and energy-related workforce development and economic development prospects. To the extent these goals seek to avoid environmental impacts affecting vulnerable communities, the State CEQA Guidelines already require consideration of whether a proposed project may conflict with goals that support sustainable communities. The following analysis has been provided by SMUD, as a proactive evaluation in excess of CEQA requirements, to identify any localized existing conditions to which the project, as proposed, may worsen adverse conditions and negatively impact the local community and identifies the need for implementation of additional site or local considerations, where necessary. Environmental justice issues are being considered in this CEQA document to help inform decision makers about whether the project supports SMUD's goal of helping to advance environmental justice and economic vitality to all communities in SMUD's service area with special attention to historically underserved neighborhoods.

4.4.2 Regulatory Context

California legislation, state agency programs, and guidance have been issued in recent years that aim to more comprehensively address EJ issues, including SB 1000 (2016), SB 535 (2012) and Assembly Bill (AB) 1550 (2016), AB 617 (2017), the California Department of Justice Bureau of Environmental Justice, the California Communities Environmental Health Screening Tool (CalEnviroScreen), and the Governor's Office of Planning and Research's (OPR's) 2020 General Plan Guidelines, Environmental Justice Element. In particular, SB 1000 has provided an impetus to more broadly address EJ; coupled with the existing requirements of CEQA, it is now time to elevate the coverage of significant environmental impacts in the context of EJ in environmental documents. These other bills have also provided the necessary policy direction to address EJ under CEQA.

Senate Bill 1000

SB 1000, which was enacted in 2016, amended California Government Code Section 65302 to require that general plans include an EJ element or EJ-related goals, policies, and objectives in other elements of general plans with respect to disadvantaged communities (DACs) beginning in 2018. The EJ policies are required when a city or county adopts or revises two or more general plan elements, and the city or county contains a DAC. EJ-related policies must aim to reduce the disproportionate health risks in DACs, promote civic engagement in the public decision-making process, and prioritize improvements that address the needs of DACs (California Government Code Section 65302[h]). Policies should focus on improving the health and overall well-being of vulnerable and at-risk communities through reductions in pollution exposure, increased access to healthy foods and homes, improved air quality, and increased physical activity.

Senate Bill 535 and Assembly Bill 1550

Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the cap-and-trade program is one of several strategies that California uses to reduce greenhouse gases (GHGs) that cause climate change. The state's portion of the cap-and-trade auction proceeds are deposited in the Greenhouse Gas Reduction Fund (GGRF) and used to further the objectives of AB 32. In 2012, the California Legislature passed SB 535 (de Leon), directing that 25 percent of the proceeds from the GGRF go to projects that provide a benefit to DACs. In 2016, the legislature passed AB 1550 (Gomez), which now requires that 25 percent of proceeds from the GGRF be spent on projects located in DACs. The law requires the investment plan to allocate (1) a minimum of 25 percent of the available moneys in the fund to projects located within and benefiting individuals living in DACs; (2) an additional minimum of 5 percent to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the state; and (3) an additional minimum of 5 percent either to projects that benefit low-income households that are outside of, but within 0.5 mile of, DACs, or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within 0.5 mile of, DACs.

Assembly Bill 617

AB 617 of 2017 aims to help protect air quality and public health in communities around industries subject to the state's cap-and-trade program for GHG emissions. AB 617 imposes a new state-mandated local program to address nonvehicular sources (e.g., refineries, manufacturing facilities) of criteria air pollutants and toxic air contaminants. The bill requires the California Air Resources Board (CARB) to identify high-pollution areas and directs air districts to focus air quality improvement efforts through the adoption of community emission reduction programs in these identified areas. Currently, air districts review individual stationary sources and impose emissions limits on emitters based on best available control technology, pollutant type, and proximity to nearby existing land uses. This bill addresses the cumulative and additive nature of air pollutant health effects by requiring communitywide air quality assessment and emission reduction planning, called a community risk reduction plan in some jurisdictions. CARB has developed a statewide blueprint that outlines the process for identifying affected communities, statewide strategies to reduce emissions of criteria air pollutants and toxic air contaminants, and criteria for developing community emissions reduction programs and community air monitoring plans.

California Department of Justice's Bureau of Environmental Justice

In February 2018, California Attorney General Xavier Becerra announced the establishment of a Bureau of Environmental Justice within the Environmental Section at the California Department of Justice. The purpose of the bureau is to enforce environmental laws, including CEQA, to protect communities disproportionately burdened by pollution and contamination. The bureau accomplishes this through oversight and investigation and by using the law enforcement powers of the Attorney General's Office to identify and pursue matters affecting vulnerable communities.

In 2012, then Attorney General Kamala Harris published a fact sheet titled, "Environmental Justice at the Local and Regional Level," highlighting existing provisions in the California Government Code and CEQA principles that provide for the consideration of EJ in local planning efforts and CEQA. Attorney General Becerra cites the fact sheet on his web page, indicating its continued relevance.

California Communities Environmental Health Screening Tool

CalEnviroScreen is a mapping tool developed by the Office of Environmental Health Hazards Assessment to help identify low-income census tracts in California that are disproportionately burdened by and vulnerable to multiple sources of pollution. It uses environmental, health, and socioeconomic information based on data sets available from state and federal government sources to produce scores for every census tract in the state. Scores are generated using 20 statewide indicators that fall into four categories: exposures, environmental effects, sensitive populations, and socioeconomic factors. The exposures and environmental effects categories characterize the pollution burden that a

community faces, whereas the sensitive populations and socioeconomic factors categories define population characteristics.

CalEnviroScreen prioritizes census tracts based on their combined pollution burden and population characteristics score, from low to high. A percentile for the overall score is then calculated from the ordered values. The California Environmental Protection Agency has designated the top 25 percent of highest scoring tracts in CalEnviroScreen (i.e., those that fall in or above the 75th percentile) as DACs, which are targeted for investment proceeds under SB 535, the state's cap-and-trade program.

Governor's Office of Planning and Research's 2020 Updated EJ Element Guidelines

OPR published updated General Plan Guidelines in June 2020 that include revised EJ guidance in response to SB 1000. OPR has also published example policy language in an appendix document along with several case studies to highlight EJ-related policies and initiatives that can be considered by other jurisdictions. Section 4.8 of the General Plan Guidelines contains the EJ guidance. The guidelines offer recommendations for identifying vulnerable communities and reducing pollution exposure related to health conditions, air quality, project siting, water quality, and land use compatibility related to industrial and large-scale agricultural operations, childcare facilities, and schools, among other things. It provides many useful resources, including links to research, tools, reports, and sample general plans.

4.4.3 Sensitivity of Project Location

Community Description

As part of its Sustainable Communities Initiative, SMUD created and maintains the Sustainable Communities Resource Priorities Map,[1] which reflects several data sets related to community attributes that SMUD uses to identify historically underserved communities. One of the key components of the map is the California Communities Environmental Health Screening Tool (CalEnviroScreen Version 3.0), which identifies communities facing socioeconomic disadvantages or health disadvantages such as multiple sources of pollution. The Sustainable Communities Resource Priorities Map provides an analysis of current data sets to indicate areas ranging from low to high sensitivity and can be used to describe the relevant socioeconomic characteristics and current environmental burdens of the project area can be described. SMUD has determined that it will evaluate EJ effects for projects located in, adjacent to, or proximate to (e.g., within 500 feet of) a high-sensitivity area as shown on the Sustainable Communities Resource Priorities Map or located in a census tract with a CalEnviroScreen score of 71 percent or greater.

[1] The Sustainable Communities Resource Priorities Map is available at https://usage.smud.org/SustainableCommunities/?_ga=2.223364443.1927542179.1598288052-1197903775.1589235097.

The proposed project is located in a high sensitivity area per the Sustainable Communities Resource Priorities Map (SMUD 2020). The project area is located in a high sensitivity area on the Sustainable Communities Resource Priorities Map because the project area was designated as an Opportunity Zone, a Sacramento Promise Zone, a Health Equity Focus Area by the Sierra Health Foundation, and as a DAC by state SB 535, which are used as tools for targeting economic development, designated by the Healthy Sacramento Coalition as an area with consistent high rates of poor health outcomes, and designated as located in an area with a population that is highly vulnerable and susceptible to harm from exposure to a hazard, and its ability to prepare for, respond to, and recover from hazards.

The proposed project is located in a census tract with a CalEnviroScreen score of 95 percent or greater, which indicates the area is confronted with many burdens and vulnerabilities from environmental pollutants (SMUD 2020). The high CalEnviroScreen score is driven by environmental conditions such as multiple potential exposures to pollutants and adverse environmental conditions caused by pollution, and high health and socioeconomic vulnerability to pollution. The pollution burden of the census tract is from a high concentration of groundwater and soil cleanup sites, largely associated with the Railyards Specific Plan (RSP) area), and vehicle traffic. The population characteristics of the census tract that contribute to a community's pollution burden and vulnerability include low birth weight, poverty, and unemployment.

4.4.4 Environmental Conditions

This discussion references the analysis conducted in the Environmental Checklist of the IS, as well as this EIR, and provides additional detail with respect to the current environmental conditions in the project area. The focus of this discussion is on environmental justice issues relevant to the project.

- **Aesthetics:** The visual characteristics of the project site and adjacent uses are typical of an urban environment with low- to mid-rise structures. The visual characteristics of the project site include a cinder block wall along the southern edge of the project site, a chain link fence along the northern, existing substation equipment within the existing substation yard. The historic Station A building also provides screening of the substation yard from the west. The site is publicly visible from H Street and is visible from residences associated with Mercy Housing Community, immediately to the east of the project site.

- **Air Quality:** The project site is located in an urban area adjacent to an existing light rail line. Nearby uses are largely office, commercial retail, and residential and are not considered substantial generators of toxic air contaminants to the area. Nearby receptors are located immediately to the east of the project site and include multi-family housing associated with Mercy Housing Community. The nearby structures with sensitive receptors are located at the same elevation as the project site, although individual living quarters are located above the first floor.

- **Cultural Resources and Tribal Cultural Resources:** There are known cultural resources and Tribal cultural resources immediately adjacent to and potentially within the boundaries of the project site (refer to Section 3.1, "Archaeological, Historical, and Tribal Cultural Resources," of this Draft EIR).

- **Energy:** Communities near the project area have access to electric vehicles through a local car share, and the portion of the project area to the south of the site within the "home zone" where those vehicles may be parked. The project area is served by SMUD, which offers the Greenergy program, which offers electricity generated with 100 percent renewable and carbon-free resources.

- **Greenhouse Gas Emissions and Climate Change Vulnerabilities:** The project area would likely be subject to increased heat stress from climate change. Although the project area is not in a 100-year flood zone, maximum flood depth maps indicate the area may be inundated under certain levee breach scenarios (FEMA 2020). Furthermore, climate change can exacerbate any issues with levees (Romero 2020).

- **Hazards and Hazardous Materials:** The project site is not identified as a hazardous materials site; however, the project site is located adjacent to the RSP area, which is included on the state Hazardous Waste and Substances List ("Cortese List") compiled pursuant to Government Code 65962.5 and referenced at Public Resources Code 21092.6. While the project site is not within the RSP boundaries, it is within the South Plume Groundwater Study Area (City of Sacramento 2016: Figure 4.8-2). The constituents of concern for the South Plume area include volatile organic compounds, semivolatile organic compounds, total petroleum hydrocarbons, and metals (City of Sacramento 2016:4.8-4 through 4.8-8).

- **Noise:** Noise sources in the project area include vehicle and rail traffic, as well as noise associated with nearby construction and the existing substation. Multi-family residences, which are considered sensitive receptors, are located adjacent to the project site's eastern boundary.

- **Public Services:** Public services such as police and fire protection are available in the area.

- **Recreation:** The nearest park is approximately 0.25 mile from the project site.

- **Transportation:** The project site is bounded by H Street to the south and Government Alley to the north. While the project site is currently a secured substation and no public access into the project site is available, the project area is accessible via existing paved roads, transit, and bicycle facilities immediately adjacent to the project site.

- **Utilities:** Existing utility service is provided by SMUD and the City of Sacramento to nearby uses, including Mercy Community Housing to the east of the project site.

4.4.5 Evaluation of the Project's Contribution to a Community's Sensitivity

As noted previously, the project would involve the decommissioning of the existing Station A substation and removal of all electrical-substation-related equipment from within the historic Station A building and the outdoor substation yard. Following the removal of all Station A equipment, SMUD would construct a new electrical substation (Station H) in place of the outdoor substation along the north side of H Street between 6th Street and 7th Street in downtown Sacramento. The project's contributions to the community's sensitivity are as follows:

- **Aesthetics:** Implementation of the project would result in the reconstruction of an existing substation within the project site. For the most part, the project would not result in a substantial modification of the project site, however, the existing cinder block wall along the project site's southern boundary would be reconstructed and the replacement wall would undergo design review with the City of Sacramento prior to wall construction. As a result, publicly accessible views would either be maintained or improved as a result of the City's design review process, which may result in additional aesthetic considerations.

- **Air Quality:** Some excavation and general construction activities would be required during the removal of existing substation equipment and installation of new, modern substation infrastructure. This would result in emissions of diesel particulate matter and fugitive dust at the project site, as discussed in Section 3.3, "Air Quality," criterion (c) of the IS. Considering the highly dispersive properties of diesel particulate matter (PM), the relatively low mass of diesel PM emissions that would be generated at any single place during project construction, and the relatively short period during which diesel-PM-emitting construction activities would take place, construction-related toxic air contaminants would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million. As also discussed in the IS, on-site construction activities would be conducted in a manner consistent with the requirements of Fugitive Dust Rule 403, set forth by the Sacramento Metropolitan Air Quality Management District (SMAQMD), which would minimize emissions of PM_{10} and $PM_{2.5}$. These measures would be consistent with the best management practices and best available control technology practices required by SMAQMD.

- **Cultural Resources and Tribal Cultural Resources:** As noted in Section 3.1, "Tribal Cultural Resources," and Section 3.2, "Cultural Resources," of this Draft EIR, the project would affect known cultural resources or Tribal cultural resources. However, mitigation measures identified in Sections 3.1 and 3.2 would be implemented to reduce (to the extent feasible) significant impacts to the resources. Further, the required treatment plan is currently being prepared as part of Tribal consultation with four Native American tribes known to have been historically present at or near the project site and is intended to ensure the appropriate and respectful handling and treatment of any resources discovered during construction.

- **Energy:** The project would not affect access to electricity or electric vehicles because it would not preclude access to car shares, and electrical service would be maintained throughout construction.

- **Greenhouse Gas Emissions and Climate Change Vulnerabilities:** The project would not worsen the area's flooding vulnerabilities because it would not affect the area's topography or levee system.

- **Hazards and Hazardous Materials:** The use and handling of hazardous materials during construction would be conducted in a manner consistent with existing regulations, including CCR Title 27. Upon completion of construction, no on-site operations would involve the use, transport, or disposal of potential hazardous materials.

- **Noise:** Noise would be generated during construction, but it would be temporary, conducted in compliance with the City of Sacramento Noise Ordinance, and similar to other construction type noise that occurs in downtown Sacramento. No substantial increases in ambient noise levels at sensitive receptors in the area would occur.

- **Public Services:** As the project site would involve the replacement of an existing substation with a new substation, project implementation would not interrupt or otherwise affect the provision of public services to the area.

- **Recreation:** The project would not affect any parks or recreational opportunities.

- **Transportation:** The project site would not affect public transit access points or bike lanes.

- **Utilities:** The project would not adversely affect the provision of utilities to existing and future uses in the project area. The project is intended to ensure continued and reliable electrical service within the downtown Sacramento area, and no interruption or reduction in service capacity would occur as a result of the project.

As described for each environmental resource area, the project would not contribute to the community's current sensitivity.

4.4.6 Summary of Environmental Justice Assessment

Per SMUD's Sustainable Communities Resource Priorities Map,[2] which reflects several data sets related to community attributes that SMUD uses to identify historically underserved communities, the project site is located in a high sensitivity area (SMUD 2020), due in part to the project area's designation as an Opportunity Zone, a Sacramento Promise Zone, and as a DAC by state SB 535. However, the project involves the reconstruction of

[2] The Sustainable Communities Resource Priorities Map is available at https://usage.smud.org/SustainableCommunities/?_ga=2.223364443.1927542179.1598288052-1197903775.1589235097.

an existing substation at the project site and could affect cultural and tribal cultural resources in the area, however, mitigation measures are included to reduce the potential contribution of the project and in cooperation with tribal community members to ensure that any impacts to resources are treated appropriately and with respect to the community(ies) in question. Further, objectives of the project include providing safe and reliable electrical service to existing and proposed development in the downtown Sacramento area, which is intended to maintain or improve living conditions for residents and communities in the area. As a result, the project does not have the potential to further affect the community and/or worsen existing adverse environmental conditions. Therefore, ***no existing environmental justice conditions would be worsened*** as a result of the project.

Although the project would not worsen existing environmental justice conditions, as a leader in building healthy communities, one of SMUD's Sustainable Communities goals is to help bring environmental equity and economic vitality to all communities. By investing in underserved neighborhoods and working with community partners, SMUD is part of a larger regional mission to deliver energy, health, housing, transportation, education and economic development solutions to support sustainable communities.

Sustainable Communities currently maintains two partnerships in the project area:

- Sierra Nevada Journeys: With an investment from SMUD's Sustainable Communities, Sierra Nevada Journeys is conducting a community needs assessment in order to develop cultural relevant education materials. This information will be shared with SMUD/other local partners and will be used to develop curriculum that is pertinent to historically marginalized communities as well as inclusive of Black, Indigenous, and People of Color. The new curriculum will be deployed through Sierra Nevada Journeys' Classroom Unleashed Program.

  The mission of Sierra Nevada Journeys is to deliver innovative outdoor, science-based education programs for youth to develop critical thinking skills and to inspire natural resource stewardship. More than 50 percent of the students they serve are from low-income families and 61 percent are students of color, working with Title 1 schools in the area. In addition, Sierra Nevada Journeys strong working relationships with local Tribes.

- Sacramento Native American Health Center(s): The Sacramento Native American Health Center Inc. (SNAHC) is a non-profit, Federally Qualified Health Center, located in Midtown Sacramento. The health center is committed to enhancing quality of life by providing a culturally competent, holistic, and patient-centered continuum of care. There are no Tribal or ethnic requirements to receive care here.

  SNAHC is community-owned and operated; a Board of Directors governs the center. Since the grand opening the center staff has grown to meet the needs of the community, 26% are Native American from both local and out-of-state Tribes.

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5 Alternatives

5.1 Introduction

The California Code of Regulations (CCR) Section 15126.6(a) (State California Environmental Quality Act [CEQA] Guidelines) requires environmental impact reports (EIRs) to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the "rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a project with the impacts of not approving the project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project …"), CCR Section 15126.6(f) (1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the Sacramento Municipal Utility District (SMUD) Board of Directors. (See PRC Sections 21081.5, 21081[a] [3].)

5.2 Considerations for Selection of Alternatives

5.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 2, "Project Description," articulated SMUD's project objectives for the proposed Station H Substation Project. The project objectives are as follows:

- Provide safe and reliable electrical service to existing and proposed development in the downtown Sacramento area.
- Meet SMUD's goals of ensuring electrical service reliability in the downtown Sacramento area by 2024.
- Provide greater operational flexibility between circuits and substations in the area.
- Maximize the use of available SMUD property and resources.
- Minimize impacts to nearby sensitive receptors.
- Minimize potential conflicts with existing planning efforts within the City of Sacramento.

5.2.2 Summary of Project Impacts

The Initial Study (IS) prepared for the project and circulated with the Notice of Preparation (NOP) evaluated whether the project would result in potentially significant impacts. For several topic areas evaluated in the IS, the project would not result in any potentially significant impacts. For some topic areas, mitigation included in the IS would reduce potentially significant impacts to a less-than-significant level. Accordingly, those resources are not addressed further in this Draft EIR. As noted in the IS, impacts related to archaeological, historical, and Tribal cultural resources were identified as potentially significant and are evaluated in this Draft EIR.

The following impacts of the project would be reduced to a less-than-significant level with implementation of mitigation in the IS (Appendix B):

- Checklist Item 3.3-a: Conflict with or obstruct implementation of the applicable air quality plan;
- Checklist Item 3.3-b: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- Checklist Item 3.4-a: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service;
- Checklist Item 3.13-b: Generation of excessive groundborne vibration or groundborne noise levels;
- Checklist Item 3.17-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Checklist Item 3.17-c: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and,
- Checklist Item 3.17-d: Result in inadequate emergency access.

Sections 3.1, “Tribal Cultural Resources,” and 3.2, “Cultural Resources,” of this Draft EIR address the environmental impacts of the project. In summary, the significant impacts of the project as evaluated in this Draft EIR are:

- Impact 3.1-1: Change the significance of Tribal cultural resources;
- Impact 3.1-2: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to Tribal cultural resources;

- Impact 3.2-1: Change in the significance of a historical resource;
- Impact 3.2-2: Change the significance of a historic-period archeological resource;
- Impact 3.2-3: Change the significance of a prehistoric archaeological resource; and,
- Impact 3.2-4: Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to cultural resources.

Feasible mitigation is available and identified Sections 3.1 and 3.2 that would reduce some project impacts to less than significant. However, project Impact 3.1-1 and cumulative Impact 3.1-2 would remain significant and unavoidable with implementation of mitigation.

5.2.3 Alternatives Considered but Not Evaluated Further

State CEQA Guidelines Section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives for the project. The range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process, and briefly explain the reasons underlying the lead agency's determination.

No Ground Disturbance Alternative

The No Ground Disturbance Substation Alternative was considered by SMUD but not evaluated further in this Draft EIR. Under this alternative, the entire yard associated with the former Station A substation would be padded. Existing subsurface utility lines associated with Station A would be abandoned in place. The level of the existing yard would be elevated approximately 3 feet to allow for the installation of utility lines within the concrete elevation. This would also require elevation of a portion of Government Alley. Due to considerations surrounding the potential need to access existing utility lines within Government Alley within the area that would be elevated, as well as the additional impact to the historic structure located to the west, this alternative is not considered feasible. This alternative would also require rerouting of Station-H-related utility line connections westward along Government Alley. In addition, this would elevate the visibility and potential line-of-sight impacts (e.g., operational noise) associated with substation operation at the adjacent Mercy Housing community. This alternative is not considered feasible also because it would not allow for the installation of piles that are required by the California Building Code to provide stability during seismic events.

5.3 Alternatives Considered in Detail

Alternatives evaluated in this Draft EIR are:

- **Alternative A (No Project)**, which assumes no new substation equipment would be installed and that the existing equipment would continue to be used until it is no longer considered viable, and then likely decommissioned and removed; and
- **Alternative B (Site Reorientation)**, which assumes the project would be reoriented to maximize the distance between the known Tribal cultural resources to the south and on-site ground disturbance; and,
- **Alternative C (Off-Site Alternative)**, which assumes that a new substation would be constructed in an area generally north of Station G.

Each of these alternatives is described in more detail and analyzed below.

5.3.1 Alternative A (No Project)

State CEQA Guidelines Section 15126.6(e)(1) requires that the no project alternative be described and analyzed "to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss "the existing conditions at the time the notice of preparation is published…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (Section 15126.6[e][2]).

Under this alternative, no new substation equipment would be installed within the yard of the former Station A. It is assumed that the existing equipment would continue to be used until it is no longer considered viable and then likely decommissioned and removed. Under this alternative, SMUD would not be able to provide reliable and safe electrical service to the anticipated level of development within the downtown Sacramento area.

This alternative would not meet any of the objectives identified in Section 5.2.1, "Attainment of Project Objectives."

Environmental Analysis

Tribal Cultural Resources

Under Alternative A, existing substation equipment would continue to operate until such time that it is no longer viable. The equipment would eventually be decommissioned and removed from the project site. Because there would be no installation of new equipment, Alternative A would avoid impacts on Tribal cultural resources. *(Less Impact)*

Cultural Resources

Under Alternative A, existing substation equipment would continue to operate until such time that it is no longer viable. The equipment would eventually be decommissioned and removed from the project site. Because there would be no installation of new equipment, Alternative A would avoid impacts on cultural resources. *(Less Impact)*

Air Quality

Alternative A would not include any new development, and thus, would not generate new construction air emissions. By comparison, development of the project would generate construction-related emissions associated with installation of new substation equipment within the project site. Therefore, because there would be no construction of new facilities under Alternative A, there would be no air quality impacts. *(Less Impact)*

Biological Resources

Under Alternative A, the project site would remain the same as under the existing conditions. While the project site does not contain habitat for special-status plant and animal species, nor riparian habitat, no changes associated with construction of the new substation would occur; and, thus, there would be no impacts to biological resources under Alternative A. By contrast, the project could have significant effects, which would be mitigated, on nesting birds and raptors. Although the project includes mitigation that would reduce impacts to a less-than-significant level, complete avoidance under Alternative A would result in reduced impacts. *(Less Impact)*

Hazards and Hazardous Materials

While the project would result in less-than-significant impacts related to hazards and hazardous materials, Alternative A would include the removal of existing equipment, which could, like the project, include disturbance of potentially contaminated soil on the project site. As with the project, SMUD would test soil samples prior to and during equipment removal to determine whether any contamination exists and remove any contaminated soil. While this alternative would involve equipment removal activities that could include use of hazardous materials (e.g., fuels, oils, and lubricants), this alternative would not include construction of new facilities. Thus, Alternative A would result in lesser impacts related to hazards and hazardous materials. *(Less Impact)*

Noise and Vibration

Construction activities associated with Station H (e.g., excavation, installation of piles, and equipment installation) would result in construction noise and vibration impacts. Through compliance with the City of Sacramento noise ordinance and project-specific mitigation measures, these impacts would be less than significant, as described in the IS. In contrast, there would be no construction-generated noise or vibration under Alternative A, because there would be no construction-related activities. *(Less Impact)*

Transportation and Circulation

Construction activities associated with the project would result in impacts to transportation and circulation in the project area. However, implementation of project mitigation requiring preparation and implementation of a traffic control plan would reduce these impacts to a less-than-significant level. Because there would be no construction on the project site under Alternative A, there would be no potential impacts on transportation and circulation. *(Less Impact)*

5.3.2 Alternative B (Site Reorientation)

Under this alternative, new substation uses would be reoriented to maximize the distance between the known Tribal cultural resources and on-site ground disturbance. This would involve the removal of existing Station A equipment and abandonment in place of any subsurface equipment associated with Station A that is present within 35 feet of the southern boundary of the project site. Where feasible, any equipment to be placed within this area would be installed on concrete pads to minimize ground disturbance. Where feasible, all necessary subsurface utilities would also be routed north from the project site and then westward along Government Alley. This alternative would not remove any existing or otherwise planned subsurface utilities, including those associated with Station G, that extend through the eastern portion of the project site.

This alternative would achieve most of the project objectives but not to the degree of the project. It would not maximize the use of available SMUD property and resources and would not minimize impacts on nearby sensitive receptors. It would also potentially conflict with existing planning efforts within the City of Sacramento, such as the Central City Design Guidelines which requires utility connections to be designed to minimize their occurrence and mitigate their visual impact (City of Sacramento 2018:4-12). This alternative would also not meet the project objective of providing greater operational flexibility between circuits and substations in the area because no ground disturbance on the project site would necessitate additional connections in Government Alley, which is already crowded with various utility connections. Due to the site restrictions associated with this alternative, the overall capacity of the on-site substation would be reduced (up to one half of capacity), and depending on future development and electrical service needs in the area, the construction of additional substation facilities within the downtown Sacramento area may be required at a later date. As a result, this alternative may not be able to meet the anticipated needs of the area to the extent of the project.

Environmental Analysis

Tribal Cultural Resources

Under the project, there would be potential impacts to Tribal cultural resources. This alternative seeks to reduce potential impacts by locating site disturbance to the northern half of the project site, away from a known resource directly south of the project site. However, the degree to which resources are present underneath the site is currently undetermined. As noted in Section 3.1, “Tribal Cultural Resources,” of this Draft EIR,

implementation of an on-site testing plan has yet to be conducted due to concerns related to subsurface testing within an active substation yard. However, monitoring has been conducted adjacent to the project site and as part of the Station G project, and no significant Tribal cultural resources were identified. Nonetheless, it is possible that this alternative could still result in the discovery/disturbance of Tribal cultural resources, impacts to which cannot be mitigated to a less-than-significant level as identified in Section 3.1, "Tribal Cultural Resources." *(Similar Impact but Less Impact to Known Resource)*

Cultural Resources

Project implementation would result in potential impacts to currently unknown archaeological resources and a known historical resource. This alternative seeks to reduce potential impacts by locating site disturbance to the northern half of the project site, away from a known resource directly south of the project site. However, the degree to which resources are present underneath the site is currently undetermined. As noted in Section 3.2, "Cultural Resources," of this Draft EIR, implementation of an on-site testing plan has yet to be conducted due to concerns related to subsurface testing within an active substation yard. However, archaeological monitoring has been conducted adjacent to the project site and as part of the Station G project, and no significant archaeological resources were identified. Nonetheless, it is possible that this alternative could discover archaeological resources, impacts on which would be mitigated to a less-than-significant level as identified in Section 3.2, "Cultural Resources." This alternative would locate new equipment within close proximity to the historic Station A building, which is a historic resource. Construction activities associated with this alternative could affect this resource. Implementation of Mitigation Measure 3.2-1a limiting ground borne vibration during construction and Mitigation Measure 3.2-1b requiring compliance with the Secretary of the Interior's Standards would ensure the integrity of the existing historic resource is maintained during construction and that construction vibration would not result in irreparable structural damage. *(Similar Impact but Less Impact to Historic Resource)*

Air Quality

Alternative B would include a smaller construction footprint as the new substation would be limited to the northern half of the existing substation yard. However, the same equipment as needed for the project would be installed for this alternative, albeit within a smaller footprint. Thus, construction emissions would be similar to those anticipated for the project. As the reoriented site would be expected to have the same operational capacity as the project, operational emissions would be the same as the project. *(Similar Impact)*

Biological Resources

Vegetation adjacent to the project site consists of street trees and sidewalk landscaping along H Street. While the project site does not contain habitat for special-status plant and animal species, nor riparian habitat, this alternative would result in lesser development than the project; and, thus, there would be less opportunity for impacts to nesting raptors and birds because this alternative would not disturb vegetation adjacent to the project site, which only occurs along H Street. *(Less Impact)*

Hazards and Hazardous Materials

While the project would result in less-than-significant impacts related to hazards and hazardous materials, it is possible that Alternative B could still result in potentially significant impacts with respect to contaminated soils. By concentrating equipment to the northern half of the project site, this alternative would concentrate substation equipment close to known areas of contaminated soil within the RSP area. However, and with respect to operational hazards, condensing the substation equipment into a smaller footprint under this alternative could increase hazards to people in the area, including SMUD staff during operations and maintenance activities. Also, there could be potential hazards from co-locating equipment in close proximity to existing or planned infrastructure related to Station G. Thus, this alternative could result in greater impacts related to hazards and hazardous materials. *(Greater Impact)*

Noise and Vibration

Project construction activities (e.g., excavation and installation of piles and equipment) would result in potentially significant noise and vibration impacts that would be reduced through compliance with the City of Sacramento noise ordinance and project-specific mitigation. As noted in the IS (Appendix B), these impacts would be reduced to less than significant with mitigation requiring measures to reduce ground vibration and development and implementation of a vibration control plan. Similarly, Alternative B would involve construction activities within the project site that would be conducted in compliance with the City's Noise Ordinance. However, because Alternative B would concentrate the substation equipment in a smaller area, the equipment could be taller than under the project, which would increase the potential for additional receptors to experience direct (line-of-sight) noise from the equipment. As such, this alternative could increase operational noise levels at nearby sensitive receptors, particularly the adjacent Mercy Housing community. *(Greater Impact)*

Transportation and Circulation

Under Alternative B, construction activities could require temporary lane closures or other impacts on transportation and circulation in the project area. Implementation of mitigation requiring a traffic control plan would reduce the impact to a less-than-significant level. Nonetheless, because construction would occur within a smaller area of the project site, the potential need for temporary closure of H Street would be less. As a result, there would be less impacts on traffic and circulation, although impacts would remain less than significant with mitigation. *(Less Impact)*

5.3.3 Alternative C (Off-Site Alternative)

Under this alternative, a new substation would be constructed at an off-site location generally north of Station G and south of the Union Pacific Railroad (UPRR) tracks. This analysis assumes an off-site location would be generally located north of Station G based on current development (i.e., currently undeveloped or under-utilized land). In addition, because of the challenges associated with routing substation lines under the UPRR tracks, it is further assumed that any off-site alternative location would need to be located

south of the UPRR tracks. Based on these locational constraints development of a substation would impact the planning and approved development that is underway or has currently been completed on these parcels within this area. Obtaining approvals for the substation would be very difficult with this alternative. Given the feasibility considerations associated with off-site locations (e.g., cost increases and logistical challenges due to proximity to connecting infrastructure) that would come with locating the substation more distant to the service area and the required transmission infrastructure, this analysis focuses on a potential site that represents the nearest feasible off-site location as it would represent the least increase in impacts related to construction length and disturbance area. This is considered to be consistent with CEQA Guidelines Section 15126.6 and the intent/purpose of alternatives within an EIR. As potential off-site locations get farther away from the existing connections near Station G and H Street, there would be greater environmental effects from the increased construction.

The parcels located within the aforementioned area sites are zoned C-3 (Central Business District Zone), similar to the project site. The parcels are located within the Railyards Specific Plan (RSP) area. Currently, the parcels are mostly vacant but are within the RSP and planned for future development. Further, none of the parcels are currently owned or otherwise controlled by SMUD. Existing equipment at the former Station A would be removed and subsurface facilities would be abandoned in place. However, this alternative would not remove any existing or otherwise planned subsurface utilities, including those associated with Station G, that extend through the eastern portion of the project site.

This alternative would require trenching to connect an off-site substation facility to existing infrastructure at the southeastern corner of the current Station A yard along H Street. Because of existing utility lines in 6th Street, the new connections required for this alternative would likely need to travel east along G Street, south along 7th Street, and west along H Street to the southeastern corner of the Station A yard for a range of approximately 1,000 feet to 2,000 feet of trenching and/or boring. Along 7th Street, there are light rail tracks located within the street, as well as numerous underground dry and wet utilities, which could require the installation of project features at greater depth (i.e., deeper excavation). Depending on the location of an off-site alternative, SMUD may be required to bore beneath these features if open trenching is not feasible, which would require the negotiation of easements to install necessary connections.

This alternative would achieve most of the project objectives but not to the degree of the project. By locating the new substation farther away from Station G and existing connections, Alternative C would not provide maximum operational flexibility. Because an offsite parcel is not owned or controlled by SMUD, this alternative would also not maximize the use of available SMUD properties and resources.

Because SMUD has long been planning for the reuse of the Station A yard, the location of Alternative C would require substantial changes to planned infrastructure and connections. These changes could take a substantial amount of time such that this alternative would not meet SMUD's goal of ensuring electrical service reliability in the

downtown Sacramento area by 2024. Finally, this alternative would not minimize impacts to nearby sensitive receptors because it would require a greater amount of construction (including 1,000 to 2,000 feet of trenching, boring, and underground utility installation) and disruption to roadways, bike lanes, sidewalks, and, potentially, to existing light rail tracks along H Street.

Environmental Analysis

Tribal Cultural Resources

Alternative C would avoid potential impacts to Tribal cultural resources within the western reach of H Street between 6th and 7th, but would require approximately 1,000 to 2,000 feet of trenching and/or boring for utility connections near the southeastern corner of the Station A site. By requiring additional trenching and potentially boring not required under the project, this alternative could result in impacts to the eastern edges of the known site. While Alternative C could reduce impacts on the known resource along H Street near 6th Street, it could disturb the known site, depending on the eastern reaches of the resource.

As noted in the 2016 Subsequent EIR prepared for the RSP, lake *Wanoho Pakan* (also known as Sutter Lake) near the southeast corner of the RSP area (west of 7th Street), is an area of predicted prehistoric archaeological sensitivity (City of Sacramento 2016:4.4-2). Tribal representatives reported that Native American activities occurred in the area of lake *Wanoho Pakan* and that even after the railroad was developed, Native American people still came back and used the site in different ways (City of Sacramento 2016:4.4-30,-31). Thus, while Alternative C could reduce some impacts to the known resource, potential off-site alternative locations are within an area of sensitivity and could impact previously-unknown Tribal cultural resources. *(Similar Impact but Less Impact to Known Resources)*

Cultural Resources

Alternative C would avoid potential impacts to cultural resources within the western reach of H Street between 6th and 7th Streets, but would require approximately 1,000 to 2,000 feet of additional trenching and/or boring for utility connections near the southeastern corner of the Station A site. By requiring additional trenching and/or boring not required under the project, this alternative could result in impacts to the eastern edges of the known site. While Alternative C could reduce impacts on the known resource along H Street near 6th Street, it could disturb the known site, depending on the eastern reaches of the resource. Further, an off-site location would still be located within the Residential/Commercial Archaeologically Sensitive Area identified in the 2007 RSP EIR and 2016 Subsequent EIR (City of Sacramento 2007). Because this alternative would not include construction adjacent to the historic Station A building, this alternative would reduce impacts on the historic resource. Thus, while Alternative C could reduce impacts on the known resource along H Street and the historic Station A building, it would be located in an archaeologically sensitive area and could impact previously-unknown cultural resources. *(Similar Impact but Less Impact to Historic Resource)*

Air Quality

Alternative C would require additional construction compared to the project as it would require trenching and installation of underground utilities to connect to existing equipment in the southeastern corner of the Station A yard. Compared with the project, which would require only minimal trenching across Government Alley, Alternative C would require approximately 1,000 to 2,000 feet of additional trenching and/or boring and installation of underground utilities. Additionally, this alternative would require a longer construction period as it would require new surrounding walls whereas the project would only replace two walls. While operational emissions would be essentially the same as the project, additional construction emissions generated by the increased construction footprint and construction period could result in greater impacts. *(Greater Impact)*

Biological Resources

While the project site does not contain habitat for special-status plant and animal species, nor riparian habitat, this alternative would result additional construction activities (including approximately 1,000 to 2,000 feet of additional trenching and/or boring and installation of underground utilities) to connect to existing utility connections near Station A. Potential Alternative C sites are mostly vacant but includes some street trees and vegetation. Construction on this site could affect nesting birds, similar to impacts anticipated for the project. Construction required to connect this site to utilities in H Street could also affect nesting birds if any trees are required for removal. Mitigation Measure 3.4-1 requires SMUD to avoid disturbance of nesting birds, which would also be required under Alternative C. Thus, impacts to nesting birds under this alternative would be similar to those of the project. *(Similar Impact)*

Hazards and Hazardous Materials

While the project would result in less-than-significant impacts related to hazards and hazardous materials, it is possible that Alternative C could still result in potentially significant impacts with respect to contaminated soils. Switching to an alternative site north of the project site would require development within the RSP area, which has known areas of contaminated soil. Thus, this alternative could result in greater impacts related to hazards and hazardous materials. *(Greater Impact)*

Noise and Vibration

Construction activities associated with the project (e.g., excavation and pile and equipment installation) would result in less-than-significant noise and vibration impacts. Through compliance with the City's Noise Ordinance and project mitigation, these impacts would be less than significant, as described in the IS. Alternative C would involve a greater construction footprint and additional construction activities, which would include approximately 1,000 to 2,000 feet of additional trenching and/or boring within roadways to connect the off-site location to existing utility connections. While construction noise and vibration impacts under Alternative C would not be expected to affect the historic Station A building, the trenching and/or boring and installation of underground infrastructure along 7th Street and H Street could be more disruptive to

residents of the Mercy Housing community than anticipated noise and vibration impacts from the project. During operation, Alternative C would likely result in less of an increase in ambient noise at the Mercy Housing community because of the additional distance from the substation equipment. However, while operational noise differences may be indiscernible, construction noise and vibration impacts would be greater than the project. *(Greater Impact)*

Transportation and Circulation

Under Alternative C, additional construction would be required to connect the off-site location to existing utility connections in the southeast corner of the Station A yard. As discussed above, the anticipated path for these connections is east along G Street, south along 7th Street, and west along H Street. The extent of this construction would be approximately 1,000 to 2,000 feet and would likely result in greater impacts to roadways, including pedestrian and bicycle facilities. Also, a portion of Sacramento Regional Transit's light rail system travels north along 7th Street and west along H Street; trenching west from 7th Street along H Street and the associated underground utility installation would be expected to adversely affect the light rail system and could include track removal and replacement and interruptions to service. Thus, this alternative could result in impacts greater than the project. *(Greater Impact)*

5.4 Comparison of Alternatives

Table 5-1 summarizes the environmental analyses provided above for the evaluated alternatives to the Station H Substation Project.

Table 5-1 Comparison of the Environmental Impacts of the Alternatives in Relation to the Project

Resource Area	Project	Alternative A (No Project)	Alternative B (Site Reorientation)	Alternative C (Off-Site Alternative)
Tribal Cultural Resources	SU	Less	Similar, but less impact to known resource	Similar, but less impact to known resource
Cultural Resources	LTS/M	Less	Similar, but less impact to historic resource	Similar, but less impact to historic resource
Air Quality	LTS/M	Less	Similar	Greater
Biological Resources	LTS/M	Less	Less	Similar
Hazards and Hazardous Materials	LTS	Less	Greater	Greater
Noise and Vibration	LTS/M	Less	Greater	Greater
Transportation and Circulation	LTS/M	Less	Less	Greater

Notes: LTS – Less-than-significant impacts; LTS/M – Less-than-significant impacts with mitigation incorporated; SU – Significant and unavoidable.
Source: Compiled by Ascent Environmental in 2020

5.5 Environmentally Superior Alternative

CCR Section 15126.6 suggests that an EIR should identify the "environmentally superior" alternative. "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." As shown in Summary of Project Impacts, Impact 3.1-1 (Change the significance of a Tribal cultural resources) and Impact 3.1-2 (Potential for the Station H Substation project, in combination with other development, to contribute to a significant cumulative impact to Tribal cultural resources) would be significant and unavoidable. Feasible mitigation is available for all other potentially significant impacts associated with project implementation.

When considering objectives, the proposed project would best meet the project objectives, as stated in Chapter 2, "Project Description." In contrast, Alternative B would not minimize impacts on nearby sensitive receptors, nor would it maximize the use of available SMUD resources and property to the extent of the project. Similarly, Alternative C, by relocating a substation needed for SMUD to provide reliable and safe electrical service in the area, would limit SMUD's operational flexibility by locating this substation at a greater distance from Station G, which is currently under construction. Furthermore, while it would be expected to reduce impacts to the known resources along H Street, the site is located within an archaeologically sensitive area and could result in impacts to previously unknown cultural and tribal cultural resources.

Consistent with State CEQA Guidelines (CCR Section 15126.6 [e][2]), because the environmentally superior alternative was identified as the No Project Alternative, another environmentally superior alternative shall be identified. Based on the environmental analysis contained in this Draft EIR, Alternative B would result in lesser impacts compared to the project. However, and as noted above, Alternative B could still result in significant and unavoidable impacts on archaeological, historical, and Tribal cultural resources. Therefore, the environmental impact differences between the project and Alternative B are not substantial enough that one is clearly superior over the other.

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