

# Appendix A

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Notice of Preparation and Scoping  
Comments

## NOTICE OF PREPARATION

**Date:** March 22, 2019

**To:** Responsible Agencies, Interested Parties, and Organizations

**Subject:** Notice of Preparation of an Environmental Impact Report for the Jesse M. Unruh Building Renovation Project, Sacramento, California

**Lead Agency:** State of California Department of General Services

**Contact:** Jennifer Parson, Senior Environmental Planner  
Department of General Services, Environmental Services Section  
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**Comment Period:** March 22, 2019 to April 22, 2019

### PURPOSE OF NOTICE

The California Department of General Services (DGS) is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the proposed Jesse M. Unruh Building Renovation Project (proposed project), located in downtown Sacramento.

Pursuant to provisions of the California Environmental Quality Act (CEQA), DGS has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

### PROJECT LOCATION

The Jesse M. Unruh Building (building) is located at 915 Capitol Mall, in downtown Sacramento. The site is approximately 2.8 acres and covers nearly the entire one-block, which is bounded by L Street to the north, 10<sup>th</sup> Street to the east, Capitol Mall to the south, and 9<sup>th</sup> Street to the west. The site is a prominent area on Capitol Mall, immediately west of the California State Capitol and north of the Stanley Mosk Library and Courts Building (Figure 1).

### PROJECT DESCRIPTION

The Jesse M. Unruh Building was constructed on land donated to the State by the City of Sacramento in 1913 and was first occupied in 1929. The building has since been continuously occupied for more than 85 years. The building is part of the “Capitol Extension Group,” along with the Stanley Mosk Library and Courts Building and the California State Capitol Building, and is part of a registered historic district.

The building has received limited updates since its original construction. In the 1970s, an air conditioning system was installed and during the 1990s, the building underwent a seismic retrofit. An infrastructure study

completed in 2008 and updated by the DGS in 2013, identified a variety fire and life safety, building code, and other infrastructure deficiencies as well as the presence of hazardous materials needing remediation.

The proposed project would involve a comprehensive renovation to extend the useful lifespan of the building by approximately 50 years and improve tenant safety and comfort. The comprehensive renovation would incorporate upgrades to fire and life-safety; accessibility; repairs to historic elements that are deteriorating or causing deterioration; hazardous materials removal; replacement of the plumbing and heating, ventilating conditioning replacement and air systems; replacement of the electrical, telecommunications and security systems; landscaping, and renovation of the elevators. The project would include restoration of historic elements as feasible and provide a new office layout for existing tenants. The project may also involve renovation or modification of the Capitol fountain. The project goal is to achieve Zero Net Energy and Leadership in Energy and Environmental Design (LEED) Silver certification.

The building, which contains approximately 125,000 net usable square feet, is included in the DGS Ten-Year Sequencing Plan, and is necessary to fulfill office space needs in the Sacramento Region. However, the renovation of the building would not substantially modify the number of employees occupying the building. The current occupants would be relocated to swing space in downtown Sacramento in Spring 2020 and would move back into the building in the Spring of 2024. The project supports DGS' strategic mission to provide the highest level of customer service in fulfilling state agencies' facility and real property needs by ultimately providing new or renovated office space to replace existing deficient office space. Additionally, the project would be consistent with statutory directives and requirements used to guide state office space planning and development (including energy reduction measures) as referenced in DGS's 2018-19 Five-Year Infrastructure Plan.

## RESPONSIBLE AGENCIES

For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency that have discretionary approval power over the project (CEQA Guidelines Section 15381). Discretionary approval power may include such actions as issuance of a permit, authorization, or easement needed to complete some aspect of the proposed project. It is anticipated that approval from various City of Sacramento departments will be required to complete the project. Where city approval may constitute a discretionary decision, such as potential approvals related to utility connections, it is expected that the City will use the EIR for the Jesse M. Unruh Building Renovation Project to support these decisions. Other agencies whose approval may be required for the project include, but may not be limited to: State Historic Preservation Officer, Sacramento Metropolitan Air Quality Management District, and Sacramento Municipal Utility District.

## POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will describe the direct and indirect environmental impacts of construction and operation of the Jesse M. Unruh Building Renovation Project. It is anticipated that the EIR will address potential impacts associated with the proposed project in the following issue areas. In addition, the EIR will evaluate alternatives, growth-inducing impacts, and cumulative impacts.

### Land Use

The Jesse M. Unruh Building is located in downtown Sacramento; renovations and subsequent operation of the existing building would not alter land use and would not develop any physical impediments that could physically divide this community. Although the project site is located in the City of Sacramento, the site is owned by and under the jurisdiction of the State; therefore, the project is not subject to City land use plans or zoning. Nonetheless, in addition to evaluating consistency with the State's Capitol Area Plan, the EIR will discuss the project's consistency with relevant City of Sacramento planning policies.

## Population, Employment, and Housing

The Jesse M. Unruh Building contains approximately 125,000 net usable square feet, is included in the DGS Ten Year Sequencing Plan, and is necessary to fulfill office space needs in the Sacramento Region. The project involves renovation of the building. Although it is not intended to increase office space, the renovation may result in some additional office space, which is not anticipated to exceed 10 percent. Therefore, the project is not anticipated to substantially affect local/regional population, employment, or housing opportunities but further information/analysis will be provided as part of the EIR.

## Transportation and Circulation

The project may result in a minor increase the total amount of office space in downtown Sacramento, which could cause a commensurate increase in traffic on local roadways and demand for transit and other modes of travel. The EIR will evaluate the project's construction-period and operational AM and PM peak hour trip generation and how the project may affect delays and level of service (LOS) at key intersections. Vehicle miles traveled (VMT) and access to the project site will also be assessed. The EIR will analyze project impacts on the roadway, bicycle, pedestrian, and transit systems.

## Utilities and Infrastructure

As described above for population, employment, and housing, the project is not anticipated to result in a substantial change in the number of employees. Nonetheless, the EIR will evaluate the project-related impacts to infrastructure and capacity of water supply and treatment, sewer and wastewater treatment, drainage and stormwater, electricity, and natural gas. Wastewater treatment and disposal for the proposed project would be provided by the Sacramento Regional County Sanitation District's (SRCSD's) Sacramento Regional Wastewater Treatment Plant (SRWTP). Wastewater generated in the project area is conveyed to the SRWTP by the City's combined stormwater runoff and sanitary sewer system (CSS); the potential change in wastewater flows to the CSS and the SRWTP will be evaluated. The City of Sacramento is the water supplier for the project site; any project-related increase in water demand will be evaluated in the EIR to determine if there is sufficient water supply. Heating and cooling for the building would continue to be supplied by steam and chilled water delivered via underground pipeline from the State's Central Plant at 7<sup>th</sup> and P Streets. If the project requires any new or modified utility infrastructure, the environmental effects of that utility work will be evaluated in the EIR.

## Air Quality

The project site is located within the Sacramento Valley Air Basin (SVAB), within the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD), which administers local, state, and federal air quality management programs for Sacramento County. Construction equipment would emit exhaust, including ozone precursors, particulate matter, and air toxics. Due to the size of the existing building (approximately 125,000 square feet), the planned energy efficiency, that the building is served by the State's Central Plant (for efficient heating and cooling), the availability of transit access, the urban location, and based on SMAQMD air quality screening criteria, the project is anticipated to comply with SMAQMD operational emissions levels; therefore, the preparation of an Air Quality Mitigation Plan is not anticipated. However, total regional operational emissions of criteria pollutants and precursors will be assessed based on project-specific information (i.e., traffic study, energy usage, building location) and compared to applicable SMAQMD significance thresholds for operational emissions.

## Greenhouse Gas Emissions and Climate Change

As noted above with respect to air quality and although the project is proposed to be highly energy efficient and is served by the State's Central Plant, construction activities associated with renovations and subsequent operation of the project would result in the generation of greenhouse gas (GHG) emissions. Therefore, the EIR will quantify GHG emissions from construction and operational (i.e., building energy, vehicle trips) activities.

## Noise

Implementing the proposed project may result in short-term and long-term increases in ambient noise levels through renovation/construction activities. The EIR will include a description of the existing noise environment, including noise sources and sensitive receptors in the project area. The EIR will then assess potential short-term (i.e., construction) and long-term (i.e., operational) noise impacts to sensitive receptors. Operational noise changes may be generated by proposed stationary sources such as emergency backup generators, parking, and vehicle trips.

## Geology and Soils

No known faults or Alquist-Priolo special studies zones are located in or adjacent to the City of Sacramento; therefore, the proposed project site would not be subject to fault rupture. The project design will be required to comply with applicable seismic and other building codes. Because the proposed project would renovate an existing building, would involve limited ground disturbance, would adhere to building codes, and because the seismic risk in Sacramento is low, significant impacts related to geologic and soils hazards are not anticipated.

## Hydrology and Water Quality

Because the project site is currently developed with impervious surfaces (e.g., the building and sidewalks), the project would not result in a substantial increase in ground coverage such that interference with groundwater recharge would occur. Because the proposed project would renovate an existing building, would involve limited ground disturbance, and would connect to the City's stormwater system, significant impacts related to hydrology and water quality are not anticipated.

## Hazardous Materials and Public Health

The evaluation will identify known hazardous materials or sources of potential hazards (e.g., asbestos, lead, wildfire hazard, etc.) at the project site. If present, hazardous materials could be released during building renovation. The proposed project would not involve activities such as industrial or manufacturing uses that could generate hazardous emissions. However, the office building would continue to use and storage of small quantities of hazardous materials, such as cleaning materials, commonly used at office and commercial locations. The routine transport, use, and disposal of such materials would be limited. Federal, state, and local laws regulate every aspect of hazardous materials transport, use, and storage. These regulations are designed to avoid significant hazards to the public and environment. The project site is not within a wildfire hazard zone or an urban-wildland interface, as the building is in downtown Sacramento. Nonetheless, this issue area will be analyzed further in the EIR. Nonetheless, this issue area will be analyzed further in the EIR.

## Cultural and Tribal Cultural Resources

The Jesse M. Unruh Building is part of a registered historic district. The elements of the building that contribute to its historical significance and that of the district will be described and the potential for the proposed project to impact the historic features will be assessed. Consultation will be initiated with the State Historic Preservation Officer per Public Resources Code Section 5024/5024.5. In addition, outreach to the Native American community and local historical groups will be conducted to solicit information on tribal cultural resources and any known cultural resources concerns or issues. There is the potential for buried prehistoric and historic-era resources within the project area, as there is in much of downtown Sacramento. Due to the potential for limited ground disturbance (such as for utility connections), potential impacts to these resources during project construction will be considered in the EIR.

## Biological Resources

Sensitive biological resources are those protected by federal, state, or local resource conservation agencies and organizations. The project site is developed and is not anticipated to support sensitive habitats or habitat for any special-status species. The EIR will disclose the common biological resources in the area, including vegetation and wildlife and, if identified, the EIR will evaluate the project's potential to impact common and sensitive biological resources.

## Public Services

The potential for an increase in office space and associated employees downtown will be considered in evaluating the project's potential impacts to fire protection services, law enforcement services, and parks and recreation facilities. Because the project does not propose removal or construction of housing, it is not anticipated to have an impact on schools. The Sacramento City Fire Department (SCFD) provides fire protection and emergency medical services to the project area, including State-owned office buildings. Police protection to the project site is provided by the California Highway Patrol (CHP) Office of Capitol Protection (OCP). The proposed project would be designed in compliance with all applicable building codes and fire protection regulations, and it is anticipated that existing police services would continue to be adequate to continue to serve the building. As the project involves an existing building that would be retained/renovated, potentially significant impacts to public services are not anticipated.

## Aesthetics/Light and Glare

Because the project would primarily involve interior renovations to the Jesse M. Unruh Building and would not change to the building massing, height, or lighting, potentially significant impacts are not anticipated. However, because the project may involve some exterior modifications, including replacement of windows, etc., additional information/analysis will be provided as part of the EIR.

## Cumulative Impacts

Implementation of the proposed project could potentially result in significant impacts; when taken together with the effects of past projects, other current projects, and probable future projects, the project's contribution to the overall cumulative effect of all these activities could be considerable. Cumulative impacts and the project's contribution to those impacts will be evaluated in the EIR.

## Alternatives

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the project's objectives, and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative.

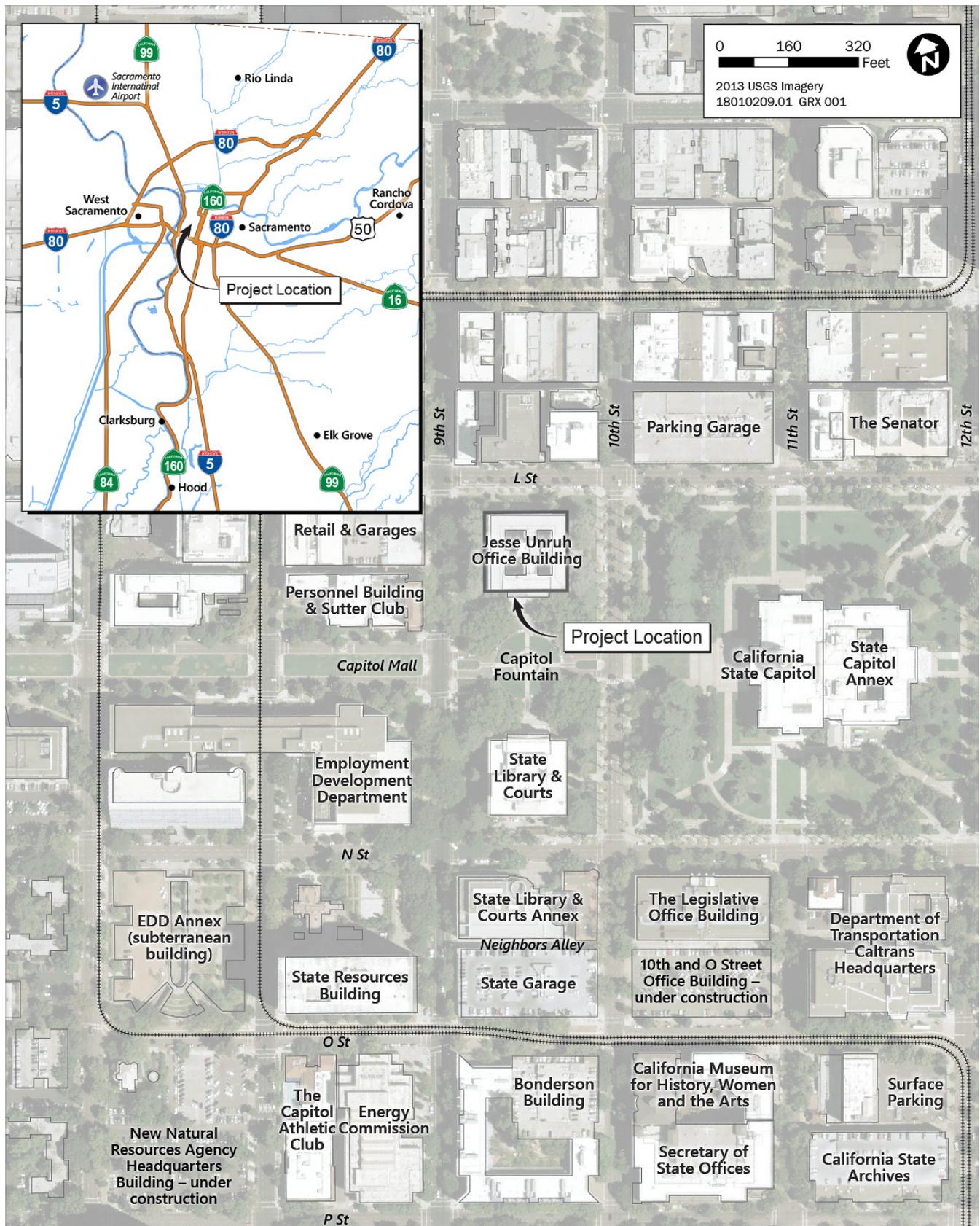
## PUBLIC REVIEW PERIOD

This Notice of Preparation is being circulated for public review and comment for a period of 31 days beginning March 22, 2019. An open house format scoping meeting will be held from 4:30 PM to 6:30 PM on Tuesday, April 9, 2019 at The Courtyard event center at 1322 O Street, Sacramento, 95814. Agencies and individuals may attend the scoping meeting at any time to obtain information on the project, ask questions of project team members, and provide comments. A brief presentation on the proposed project and the CEQA process will be given. Written comments will be accepted by DGS through 5:00 PM on April 22, 2019. Comments must be delivered or mailed to Ms. Jennifer Parson, at the address listed above.

Copies of the Notice of Preparation may be reviewed at the following locations:

- ▲ Sacramento Central Library at 828 I Street during library hours;
- ▲ Department of General Services, Environmental Services Section between 8:00 AM and 4:30 PM; or
- ▲ Request a copy by email at [environmental@dgs.ca.gov](mailto:environmental@dgs.ca.gov).

Your views and comments on how the project may affect the environment are welcomed. Please contact Ms. Jennifer Parson if you have any questions about the environmental review process for the Jesse M. Unruh Building Renovation Project.



Source: Sacramento County 2006. Adapted by Ascent Environmental in 2019.

**Figure 1** Project Location

NATIVE AMERICAN HERITAGE COMMISSION  
Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691 Phone (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>  
Twitter: @CA\_NAHC



April 2, 2019

Jennifer Parson  
Department of General Services  
P.O. Box 989052  
West Sacramento, CA 95798

RE: SCH# 2019039120 Jesse M. Unruh Building Renovation Project, Sacramento County

Dear Ms. Parson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
  
8. **Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
  
9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
  
10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
  
11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email

address: [Katy.Sanchez@nahc.ca.gov](mailto:Katy.Sanchez@nahc.ca.gov).

Sincerely,



for  
Katy Sanchez  
Associate Environmental Planner

cc: State Clearinghouse

## Suzanne Enslow

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**From:** Environmental@DGS <Environmental@dgs.ca.gov>  
**Sent:** Monday, April 08, 2019 10:29 AM  
**To:** Suzanne Enslow  
**Subject:** FW: NOP Jesse M Unruh Building Renovation Project

JENNIFER PARSON

916.376.1604 | [jennifer.parson@dgs.ca.gov](mailto:jennifer.parson@dgs.ca.gov)

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**From:** King Tunson [mailto:ktunson@sfd.cityofsacramento.org]  
**Sent:** Thursday, April 04, 2019 10:12 AM  
**To:** Environmental@DGS <Environmental@dgs.ca.gov>  
**Subject:** NOP Jesse M Unruh Building Renovation Project

Hi Jennifer,

I don't have any comments for the above-referenced NOP.

King Tunson  
Program Analyst  
Planning Entitlement/Admin Supervisor  
Sacramento Fire Department  
5770 Freeport Blvd, Ste 200  
Sacramento, CA 95822  
Office (916) 808-1358  
Fax (916) 808-1677  
[ktunson@sfd.cityofsacramento.org](mailto:ktunson@sfd.cityofsacramento.org)

## Suzanne Enslow

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**From:** Environmental@DGS <Environmental@dgs.ca.gov>  
**Sent:** Thursday, April 11, 2019 10:20 AM  
**To:** Suzanne Enslow  
**Cc:** Wilburn, Paul@DGS; McCauley, Kevin (Contractor)@DGS  
**Subject:** FW: CA DGS - CEQA NOP for Jesse M. Unruh Building Renovation Project  
**Attachments:** CA DGS - CEQA NOP of EIR for Jesse M Unruh Bldg Renovation.pdf

The City of Sacramento has given us some direction on what they'd like to see in the EIR for Unruh.

JENNIFER PARSON

916.376.1604 | [jennifer.parson@dgs.ca.gov](mailto:jennifer.parson@dgs.ca.gov)

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**From:** Jodi Carlson [mailto:JCarlson@cityofsacramento.org]  
**Sent:** Wednesday, April 10, 2019 10:39 AM  
**To:** Environmental@DGS <Environmental@dgs.ca.gov>  
**Cc:** Scott Johnson <SRJohnson@cityofsacramento.org>; Kevin A. Hocker <KHocker@cityofsacramento.org>  
**Subject:** FW: CA DGS - CEQA NOP for Jesse M. Unruh Building Renovation Project

The EIR should evaluate the impacts of construction activity on existing City street trees.

Will there be a need to remove any City trees to upgrade utilities or for any other reason?

Will non-standard pruning or removal be required for clearance needed to accommodate construction equipment?

Are there other foreseeable impacts to City trees.

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**From:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>  
**Sent:** Friday, March 29, 2019 2:06 PM  
**To:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>  
**Cc:** Tom Buford <[TBuford@cityofsacramento.org](mailto:TBuford@cityofsacramento.org)>; Karlo Felix <[KFelix@cityofsacramento.org](mailto:KFelix@cityofsacramento.org)>; Ron Bess <[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)>  
**Subject:** CA DGS - CEQA NOP for Jesse M. Unruh Building Renovation Project

We have attached the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Jesse M. Unruh Building Renovation Project issued by the State of California Department of General Services. The Jesse M. Unruh Building is located at 915 Capitol Mall, Sacramento, CA.

The City is identified as a potential Responsible Agency for potential discretionary actions that may occur as part of any permit approvals.

The period for submitting comments on the scope and content of information to be included in the EIR is March 22, 2019 and ends April 22, 2019.

Thank you,

Scott Johnson

City of Sacramento  
Community Development Department  
Environmental Planning Services  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
(916) 808-5842  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)



GAVIN NEWSOM  
GOVERNOR



JARED BLUMENFELD  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Central Valley Regional Water Quality Control Board

16 April 2019

Jennifer Parson  
Department of General Services  
P.O. Box 989052  
West Sacramento, CA 95798

**CERTIFIED MAIL**  
7014 2120 0001 4292 3815

### **COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, JESSE M. UNRUH BUILDING RENOVATION PROJECT, SCH#2019039120, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 22 March 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Jesse M. Unruh Building Renovation Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

#### **I. Regulatory Setting**

##### **Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases,

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

in part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

#### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

#### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

#### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/regulatory\\_information/for\\_growers/coalition\\_groups/](https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/) or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 11-100 acres are currently \$1,277 + \$8.53/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order.

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

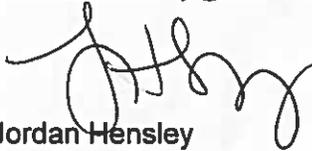
If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A

complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

<https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4812 or [Jordan.Hensley@waterboards.ca.gov](mailto:Jordan.Hensley@waterboards.ca.gov).



Jordan Hensley  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento



*Sent Via E-Mail*

April 22, 2019

Jennifer Parson  
CA Department of General Services  
PO Box 898052  
West Sacramento, CA 95798

**Subject: Jesse M. Unruh Building Renovation Project / NOP / 2019039120**

Dear Jennifer Parson,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the Jesse M. Unruh Building Renovation Project (Project, SCH 2019039120). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project NOP will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
  - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
  - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:

- SMUD has existing 12 kV underground (UG) infrastructure and facilities along the west side of the NOP area (east side of 9th Street).
- Existing 12 kV UG infrastructure and facilities within the NOP area approximately at the southwest corner of the property running northeast to a 12 kV transformer vault within the basement of the existing building.
- Existing 12 kV transformer vault in the basement of the existing building.
- SMUD may require additional transformer space within the premises if the building or improvements for changes, additions or increases to the existing electrical service to the building. This additional space may include an expansion of the existing 12 kV transformer space located within the basement of the building, or a new space sufficient to meet the entire needs of the installed electrical service as part of any renovation or improvements.
- SMUD may require additional 12 kV UG infrastructure within the NOP area to accommodate any additional transformer requirements as part of the project.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera at [rob.ferrera@smud.org](mailto:rob.ferrera@smud.org) or 916.732.6676.

Sincerely,



Nicole Goi  
Regional & Local Government Affairs  
Sacramento Municipal Utility District  
6301 S Street, Mail Stop A313  
Sacramento, CA 95817  
[nicole.goi@smud.org](mailto:nicole.goi@smud.org)

Cc: Rob Ferrera