FINAL ENVIRONMENTAL IMPACT REPORT

Resources Building Renovation Project

SCH# 2019120011

Prepared for:

GENERAL SERVICES

California Department of General Services
707 3rd Street, MS-509
West Sacramento, CA 95605

November 30, 2020

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Prepared for:

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707 3rd Street, MS-509
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Contact:

Stephanie Coleman,
Senior Environmental Planner

Prepared by:

Ascent Environmental
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Contact:

Suzanne Enslow,
Project Manager

November 30, 2020

19010106.01

FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

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LIST OF ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
CAAQS	California ambient air quality standards
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
DGS	California Department of General Services
Draft EIR	draft environmental impact report
LEED	Leadership in Energy and Environmental Design
NAAQS	national ambient air quality standards
NO_X	nitrogen oxides
NRHP	National Register of Historic Places
PM_{10} and $PM_{2.5}$	particulate matter
PRC	Public Resources Code
SMAQMD	Sacramento Metropolitan Air Quality Management District
TCR	Tribal Cultural Resource
UAIC	United Auburn Indian Community

1 INTRODUCTION

1.1 OVERVIEW

On March 27, 2020, the State of California Department of General Services (DGS) distributed to public agencies and the general public a draft environmental impact report (Draft EIR) prepared pursuant to the California Environmental Quality Act (CEQA) for the Resources Building Renovation Project in downtown Sacramento, California. The project would involve a comprehensive tear-down and reinforcement/rebuild to extend the building's useful lifespan.

The Draft EIR was made available for a period of 45 days during which public and agency comments were received. The public review period ended on May 11, 2020. Six comment letters were received on the document during the comment period, and one additional letter was received after the close of the comment period.

This final environmental impact report (Final EIR) has been prepared under the direction of DGS in accordance with the requirements of CEQA and the State CEQA Guidelines (California Code of Regulations, Sections 15089 and 15132). The Final EIR consists of the Draft EIR and this document, which includes comments received on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

This document is divided into five chapters:

Chapter 1, "Introduction," provides an overview of the environmental review process and a summary of the proposed Resources Building Renovation Project.

Chapter 2, "Responses to Comments," reproduces public comments received on the Draft EIR and presents responses to those comments.

Chapter 3, "Revisions to the Draft EIR," identifies changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. The text deletions are shown in ~~strikethrough~~ and text additions are shown in <u>underline</u>.

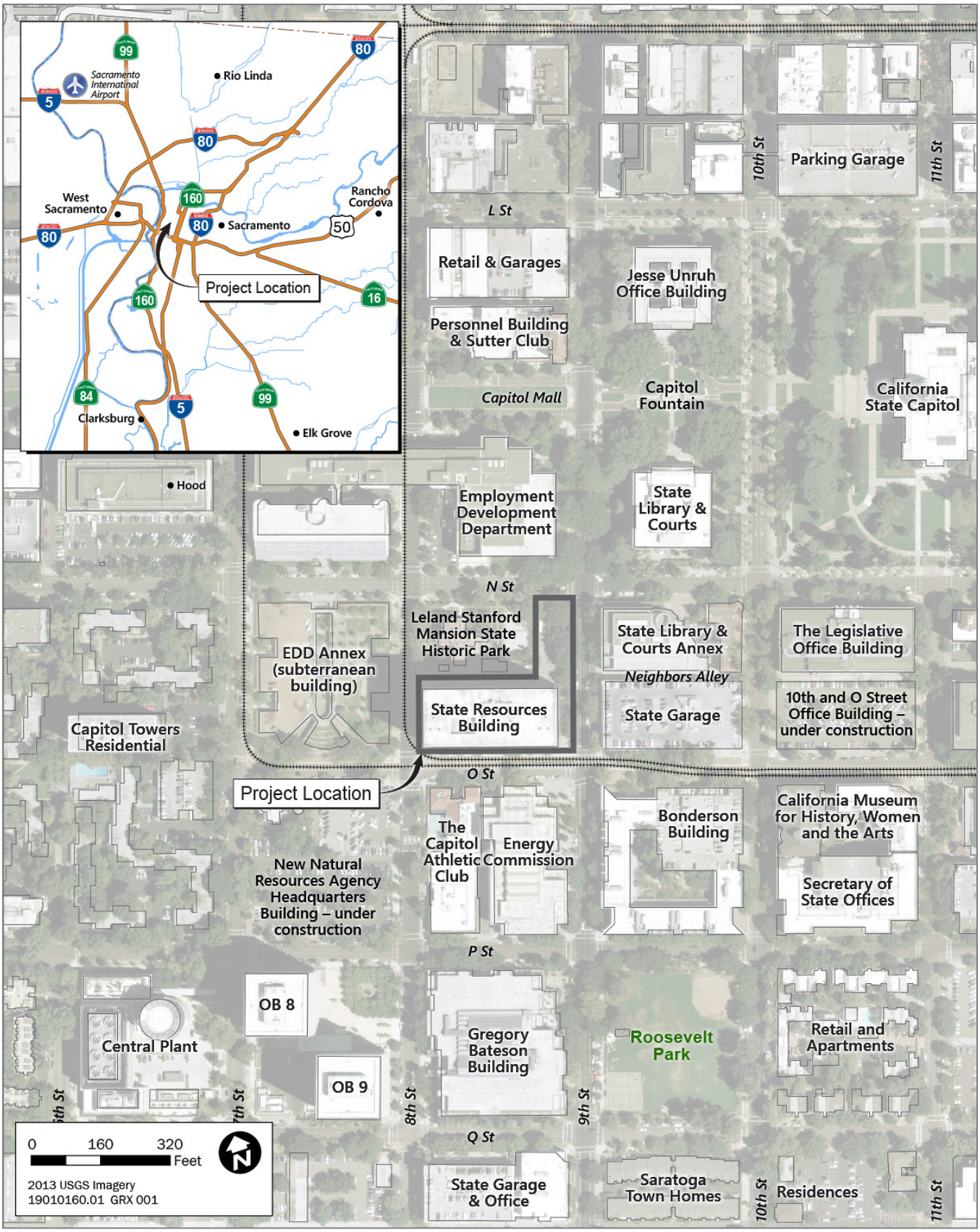
Chapter 4, "References," lists references cited in this document.

Chapter 5, "List of Preparers," identifies the preparers of the document.

1.2 SUMMARY DESCRIPTION OF THE PROJECT

1.2.1 Project Location

The Resources Building is a 17-story, 657,000-square-foot building located at 1416 9th Street in downtown Sacramento. It is located southwest of the California State Capitol and south of the Capitol Mall corridor. As shown on Figure 1-1, the project site encompasses approximately three quarters of the block bounded by N Street on the north, 9th Street on the east, O Street on the south, and 8th Street on the west. The building covers most of the southern half of the block, south of Neighbors Alley. The northeastern portion of the block, which is occupied by trees and bicycle lockers, is included in the project site as is Neighbors Alley; however, the northwestern portion of the block, which supports the Leland Stanford Mansion State Historic Park, is not part of the project and is not included in the project site.



Source: Data compiled by Ascent Environmental in 2019

Figure 1-1 Site Location

1.2.2 Synopsis of Project Characteristics

The following is a synopsis of the project characteristics. For further information, see Chapter 3, "Project Description," of the Draft EIR. The DGS Real Estate Services Division is responsible for the planning, permitting, and implementation of the Resources Building Renovation Project, which would be funded by the State of California through the State Projects Infrastructure Fund, as administered by DGS.

The Resources Building, constructed by the State of California in 1964, has been continuously occupied for nearly 50 years. The building's central location allows easy access to the Governor, legislators, and other State agencies, and the building's size, approximately 657,000 square feet, supports approximately 2,400 State employees. The building, which is considered a "high rise" by the building code, has received minimal repair and updating since its construction. According to a 2001 Resources Renovation Study, the State Fire Marshal identified numerous building deficiencies that did not comply with fire and life-safety standards in 1996. In 1997, it was identified that the structural strength of the building needed improvement (DGS 2001). A Resources Building Renovation Study Update, prepared in 2014, identified that the building's seismic deficiencies and absence of modern high-rise fire, and life and safety elements put the building's occupants at high risk should an earthquake, fire, or any other emergency event occur (DGS 2014). Other building deficiencies identified in the 2014 study include the presence of hazardous materials (e.g., asbestos) and water intrusion, as well as needed upgrades to emergency access, air systems, plumbing, telecommunications, lighting controls, restrooms, and other building infrastructure (DGS 2001; DGS 2014).

The project would involve a comprehensive tear-down, removing the majority of the building while leaving the steel building frame and concrete decking in place. Project demolition activities would include removal of existing asphalt and some surrounding concrete, including sidewalks, as well as removal of hazardous materials within the building. After demolition is complete, a comprehensive renovation of the building would implement compulsory code-required improvements including seismic upgrades and reinforcement to the existing building frame, installation of a building-wide fire sprinkler system, reconstruction of three 17-story exit stair towers, and replacement of asbestos-containing fireproofing. Additionally, the antiquated mechanical, plumbing, electrical, security, and telecommunication systems would be replaced. The project would remove architectural barriers in accordance with the Americans with Disabilities Act (ADA) and the California Building Code (CBC) and the building envelope (roof, windows, and exterior pre-cast concrete panels) would be replaced to correct seismic deficiencies, alleviate water intrusion, and increase energy efficiency. Because of the building's historic designation, the renovations would be designed to address the building's historic character, as well as correct the critical fire and life safety issues and other code deficiencies. The project goal is to achieve Zero Net Energy and Leadership in Energy and Environmental Design (LEED) v4 Silver certification. Once operational, the building would retain its existing height of 17 stories and gross building area of approximately 657,000 square feet. The asphalt and concrete for sidewalks, Neighbors Alley, and plaza would be reestablished and landscaping and trees would be replaced where possible.

1.3 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR evaluated the potential for the Resources Building Renovation Project to result in physical environmental effects related to Archaeological, Historic, and Tribal Cultural Resources; Transportation and Circulation; Utilities and Infrastructure; Air Quality; Greenhouse Gas Emissions and Climate Change; Energy; Noise; Hazards and Hazardous Materials; Biological Resources; and Aesthetics. As summarized in Table 2-1 of the Draft EIR, the project's impacts were determined to be less than significant for all resources except Archaeological, Historical, and Tribal Cultural Resources, Transportation and Circulation, Noise, and Biological Resources. Mitigation Measures 4.3-1 through 4.3-4(a-f). 4.4-5, 4.9-2, and 4.11-1 through 4.11-3 reduce the project's impacts on these resources to less-than-significant levels, except for the project's impact to the historic architectural resources of the Resources Building, which would remain significant and unavoidable despite implementation of feasible mitigation measures.

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2 RESPONSES TO COMMENTS

This chapter contains the six comment letters received during the public review period for the Draft EIR, which concluded on May 11, 2020, and one comment letter received after May 11, 2020. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses have been prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including a numerical designation for each comment letter received (A1, A2, A3, etc.), the author of the comment letter, and the date of the comment letter.

Table 2-1 List of Commenters

Letter No.	Commenter	Date
	AGENCIES	
A1	United Auburn Indian Community Tribal Historic Preservation Department Anna M. Starkey, M.A., RPA	April 6, 2020
A2	Sacramento Metropolitan Air Quality Management District CEQA & Land Use Section, Transportation & Climate Change Division Joseph James Hurly, Associate Air Quality Planner/Analyst	April 21, 2020
A3	Sacramento Fire Department King Tunson, Planning Entitlements/Administration	May 1, 2020
A4	City of Sacramento Carson Anderson, Preservation Director	May 8, 2020
A5	City of Sacramento Department of Public Works, Transportation Division Pelle Clarke, Senior Engineer	May 11, 2020
A6	City of Sacramento Department of Public Works, Urban Forestry Kevin A. Hocker, City Urban Forester	May 11, 2020
A7	Shingle Springs Band of Miwok Indians Kara Perry, Site Protection Manager, Cultural Resources Department	June 26, 2020 (comment received after conclusion of the public comment period)

2.2 COMMENTS AND RESPONSES

The written comments received on the Draft EIR and the responses to those comments are provided below. Each individual comment within the letters (Comment A1-1, Comment A1-2, etc.) is reproduced in its entirety and is followed by the response (Response A1-1, Response A1-2, etc.).

2.3 AGENCIES

Letter A1 United Auburn Indian Community

Anna M. Starkey, M.A., RPA
Tribal Historic Preservation Department
April 6, 2020

DGS appreciates the United Auburn Indian Community's (UAIC) review of the Resources Building Renovation Project Draft EIR and acknowledges receipt of the comments via email. As requested by UAIC in Assembly Bill (AB) 52 consultation, to provide confidentiality, DGS has provided written responses to the comments directly to the tribe. The comments and responses are not reproduced herein.

Letter A2 Sacramento Metropolitan Air Quality Management District

Joseph James Hurly, Associate Air Quality Planner/Analyst
CEQA & Land Use Section, Transportation & Climate Change Division
April 21, 2020

Comment A2-1

Thank you for providing the Draft Environmental Impact Report (DEIR) for the Resources Building Renovation Project (project) to the Sacramento Metropolitan Air Quality Management District (SMAQMD or Sac Metro Air District) for review. This project consists of a comprehensive tear-down, reinforcement, and rebuild of the State Resources Building, a 17-story building at 1416 9th Street In downtown Sacramento. SMAQMD comments on the DEIR and design recommendations follow.

Response A2-1

DGS appreciates SMAQMD's review and input. Please see Responses A2-2 through A2-9, below.

Comment A2-2

California Environmental Quality Act (CEQA) Comments:

Construction (Short-term) Emissions:

Table 4.6-4 in the DEIR shows that the maximum emissions of criteria air pollutants and ozone precursors would not exceed SMAQMD thresholds of significance for nitrogen oxides (NO_X) and particulate matter (PM_{10} and $PM_{2.5}$) when SMAQMD's Basic Construction Emission Control Practices are implemented; however, these emission control practices were only noted in the air quality narrative and a table footnote. SMAQMD recommends that the Department of General Services (DGS) add the SMAQMD's Basic Construction Emission Control Practices as Conditions of Approval for the project or include them in the project's Mitigation Monitoring and Reporting Program. The SMAQMD's Basic Construction Emission Control Practices are attached for your reference.

As a reminder, the thresholds of significance for particulate matter are 80 pounds/day or 14.6 tons/year for PM_{10}, and 82 pounds/day or 15 tons/year for $PM_{2.5}$, only if the project implements SMAQMD's Basic Construction Emission Control Practices; otherwise, the particulate matter thresholds are zero (0) for the total emissions of PM_{10} and $PM_{2.5}$.

Response A2-2

As disclosed in Impact 4.6-1 and Table 4.6-4 of the Draft EIR, construction activities would not result in emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ that would exceed SMAQMD-recommended thresholds. Therefore, construction-generated emissions of criteria air pollutants or precursors would not contribute substantially to the nonattainment status of the SVAB for ozone with respect to the California ambient air quality standards (CAAQS) and national ambient air quality standards (NAAQS), PM_{10} with respect to the CAAQS, and $PM_{2.5}$ with respect to the NAAQS. As noted in Table 4.6-4 of the Draft EIR, DGS would comply with SMAQMD's Basic Construction Emissions Control Practices. DGS will establish conditions of approval for the design-build team that require implementation of SMAQMD's Basic Construction Emission Control Practices throughout the project construction period, as follows:

- Control of fugitive dust (required by District Rule 403 and enforced by District staff).
- Water all exposed surfaces 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 feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- 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.

DGS recognizes that California regulations limit idling from both on-road and off-road diesel-powered equipment. The California Air Resources Board (CARB) enforces idling limitations and compliance with diesel fleet regulations. Therefore, the following exhaust emission controls from diesel powered fleets working at the construction site will also be made conditions of approval for the design-build team:

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [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.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1].

Additionally, although not required by local or state regulation, DGS will require the design-build team to:

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Comment A2-3

Operational (Long-term) Emissions: The project is not anticipated to exceed the Sac Metro Air District thresholds of significance for operational emissions of criteria air pollutants and ozone precursors.

Response A2-3

As documented in Impact 4.6-2 of the Draft EIR, although project operations would result in the generation of long-term operational emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$, the emissions would not exceed SMAQMD's thresholds of significance (65 lb/day for ROG, 65 lb/day for NO_X, 80 lb/day for PM_{10}, and 82 lb/day for $PM_{2.5}$). Therefore, operational emissions would not conflict with the air quality planning efforts or contribute substantially to the nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone, CAAQS PM_{10}, or the NAAQS for $PM_{2.5}$. This impact would be less than significant.

Comment A2-4

Greenhouse Gas Emissions and Climate Change:

SMAQMD commends the project for pursuing Leadership in Energy and Environmental Design (LEED) Silver certification, not being serviced with natural gas, and receiving 100% renewable energy through the State energy contract with the Sacramento Municipal Utility District.

Consequently, this project appears to be consistent with the State's Green Building Action Plan as required by EO-8-18-12[1].

[1] Green Building Action Plan; EXECUTIVE ORDER B-18-12 (4-25-2012) hups://green.ca.gov/buildings/resources/executiveorder/

Response A2-4

As discussed in Impact 4.8-1 of the Draft EIR, the building would be designed to comply with the Green Building Action Plan for State-owned buildings established under Executive Order B-18-12. Also consistent with the Green Building Action Plan, measures addressing energy reduction, energy-efficient design strategies, electric vehicle charging, and renewable energy sources would be implemented to meet LEED Silver certification. Other energy-efficient design features include light-emitting diode lighting and EnergyStar®–certified office equipment.

Comment A2-5

Coordinate with the City of Sacramento to ensure the project is consistent with the Central City Specific Plan: The City of Sacramento's Central City Specific Plan includes plans for various improvements adjacent to and within the vicinity of the project site. These plans include lane reductions on 8th Street, a 1-way to 2-way conversion of N street, a Class II enhanced buffered bike lane along N street adjacent to the project site, and transit investments along 8th and 9th streets in the vicinity of the project site. SMAQMD recommends that DGS coordinate with the City of Sacramento to ensure the project is supportive and complementary to these planned infrastructure improvements.

Additionally, SMAQMD supports mitigation measure 4.4-5: Improve Pedestrian Crossings at the O Street/8th Street and O Street/9th Street Intersections.

Response A2-5

The City's future infrastructure improvements are included in the cumulative impact analysis in Chapter 5 of the Draft EIR. These improvements are listed in Section 5.2.4, "Related Projects," and are considered in the cumulative transportation and circulation impacts in Section 5.3.2, "Transportation and Circulation." The Resources Building Renovation Project does not include permanent modifications to the surrounding transportation infrastructure system and would not conflict with future implementation of Grid 3.0 elements. In addition, the State will implement Mitigation Measure 4.4-5 to improve the pedestrian crossings at the O Street/8th Street and O Street/9th Street intersections.

Comment A2-6

Bicycle Parking: SMAQMD recommends the inclusion of short-term bicycle parking for visitors and long-term bicycle storage for employees. Short-term bicycle parking should be adjacent to public entrances to the building and feature racks that allow for the storage of personal bicycles and BikeShare bicycles. Long-term bicycle parking should be in a secure, ground-level, multi-bicycle room with racks that can accommodate a variety of bicycle shapes and sizes. and provide electrical service to allow for the charging of e-bicycles. Short-term & long-term parking facilities should be of sufficient quantity to ensure that bicycle parking related to the project does not overflow onto existing facilities or informal bicycle parking locations (street furniture, street signs, etc.).

Response A2-6

DGS would include both short-term and long-term bicycle parking in the Resources Building Renovation Project. It is anticipated that five loop bike racks, providing short-term bicycle parking for ten bikes would be provided external to the building. In addition, there would be an external rack for electric bikes and scooters (such as Jump bikes and scooters). Long-term bicycle parking for employees would be provided in a secured indoor room with space for between 50 to 120 bicycles.

Comment A2-7

Tree Shading: SMAQMD encourages DGS to work with the City of Sacramento and Regional Transit to identify feasible locations for new shade trees and install new trees as a replacement for tree canopy lost due to the project's construction.

Response A2-7

As addressed in Impact 4.11-3 of the Draft EIR, the project would result in the removal of trees within the State-owned landscaped areas as well as City street trees. It is DGS's intent to retain/save as many trees as possible within the boundaries of the project during the demolition and rebuild of the Resources Building. However, preliminary site logistics plans, total building skin removal, pedestrian safety, and location of the construction site indicates that many of the onsite trees would be affected. Recognizing this, considerable effort has been placed on designing the

surrounding landscape and plaza areas to be in the international modern style, which incorporates trees (existing/new) in the site design. Vegetation would be chosen to address shade, drought-tolerance, the long-term health and sustainability of the entire remodeled area, and to avoid heat islands.

Mitigation Measure 4.11-3 requires that, prior to tree removal and other site preparation and demolition activities, DGS will complete a survey of trees at the project site and any other areas affected by excavation (e.g., utility work), demolition, and construction, and prepare and submit a detailed tree removal, protection, replanting, and replacement plan for the City street trees to the City arborist. The City street tree removal plan will be developed by a certified arborist. Implementation of this mitigation measure would reduce potentially significant impacts associated with City street tree removal to a less-than-significant level by providing replacement trees and complying with the City's Tree Preservation Ordinance.

Comment A2-8

SMAQMD Rules: All projects am subject to SMAQMD rules at the time of construction. Specific rules that may relate to construction activities are attached. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800.

Response A2-8

DGS and the project planners and engineers will work with the District to ensure current rules are followed and that any necessary permitting is obtained for the project.

Comment A2-9

Notifications: Please provide the SMAQMD with hyperlinks to electronic copies of any further notifications regarding this project by sending them to projectreview@airguality.org. SMAQMD would appreciate the opportunity to review and comment on any further changes or documents related to this project.

Please contact me at 916-874-2694 or Jhurley@airguality.org if you have any questions regarding these comments and recommendations.

Response A2-9

DGS appreciates Sac Metro Air District's input and will continue to provide SMAQMD notifications regarding the project.

Letter A3 Sacramento Fire Department

King Tunson, Planning Entitlements/Administration
May 1, 2020

Comment A3-1

The above-referenced document has been reviewed and I don't have any comments.

Response A3-1

DGS appreciates review by the Sacramento Fire Department. DGS will inform the Fire Department of future actions related to the CEQA process for the Resources Building Renovation Project and will coordinate with your staff as necessary through the project construction process.

Letter A4 City of Sacramento

Carson Anderson, Preservation Director
May 8, 2020

Comment A4-1

Good afternoon. This is in response to a postcard invitation to me in my capacity as Preservation Director of the City of Sacramento to offer comment on the Resources Building Replacement Project Draft EIR. Thank you for the opportunity.

The DEIR identifies the subject building as being on the State Master List of Historical Resources, and as being eligible for the National Register (NRHP) and California Register (CRHR) under Criteria 1/A (association with broad patterns of history) and Criteria C/3 (design/planning considerations). The DEIR further notes that the Stanford Mansion is on the State Master, listed on the NRHP, CRHR and Sacramento Register, and that it also has National Historic Landmark status (1987).

Response A4-1

DGS appreciates review by the City of Sacramento Preservation Director. Please see responses to your comments below.

Comment A4-2

As noted in the regulatory framework discussion in the DEIR, it is the stated policy of the City to consider demolition of historic resources as a last resort option (2035 General Plan Policy 2.1.15) even while also accommodating sustainable growth and change (2035 General Plan Goal LU 1.1), in part, by protecting subsurface cultural resources and ensuring new contextually responsive/appropriate infill development. Bearing in mind the City's preservation policies the proposed "comprehensive teardown" of the Resources Building is regrettable and should be and avoided if at all feasible. One concern I have in reading the DEIR is that although the "Project Background and Need" section provides a compelling rationale for why such a massive intervention is necessary to address life-safety, hazardous materials remediation, technology infrastructure, utilities and energy conservation purposes, it does not include a rehabilitation alternative to explain why such a project alternative is infeasible and would not meet project purposes. The Final EIR should include a rehabilitation alternative along with the current No Project and complete teardown-and-rebuild alternatives. This is essential in demonstrating to the public why rehabilitation of the Resources Building is not feasible.

Response A4-2

DGS has determined that the Resources Building needs a major renovation to correct serious seismic and fire/life safety code deficiencies and replace antiquated infrastructure systems (see Draft EIR Chapter 3, Section 3.1, "Project Background and Need"). The compulsory code-required improvements include: seismic upgrade, installation of a building-wide fire sprinkler system, reconstruction of three 17-story exit stair towers, and asbestos-free fireproofing. Extensive demolition is required to replace the obsolete mechanical, plumbing, electrical, security, and telecommunication systems. The project would include removal of architectural barriers in accordance with the Americans with Disabilities Act (ADA) and the California Building Code (CBC). Replacement of the building envelope (roof, windows, and exterior pre-cast concrete panels) is necessary to correct seismic deficiencies, alleviate water intrusion, and to increase energy efficiency. Finally, hazardous materials are present in existing building materials and require abatement.

DGS evaluated alternatives to achieve the necessary renovations via different construction phasing schemes. This is summarized in Section 7.3.1, "Renovate Occupied Building," of the Draft EIR, which discussed partial building occupancy during construction. Although technically feasible to achieve the project goals, this alternative would increase fire/life safety risks, project costs, and construction duration compared to the proposed project. For these reasons, this alternative was rejected from detailed consideration.

Alternative 1, the No Project Alternative, and Alternative 2, the Replacement Building Alternative, presented in Section 7.4 of the Draft EIR, examined, respectively, leaving the building in its current state and a complete building demolition and new building construction. As presented in Table 7-1 of the Draft EIR, Alternative 2, the Replacement Building Alternative, would be the environmentally superior alternative because although the environmental impacts would be similar to the proposed project and no significant impacts or significant and unavoidable impacts would be completely avoided, the reduced building size (due to the reduced building height to meet the Capitol View Protection Act) would reduce utility and energy demands and would reduce air pollutant emissions and GHG emissions.

The comment states that a "rehabilitation" alternative should also be evaluated. DGS assumes that the term "rehabilitation" is referring to rehabilitation of the Resources Building based on the Secretary of the Interior's Rehabilitation Standards and the California Historical Building Code. Rehabilitation is defined by the Secretary of the

Interior as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Rehabilitation Standards acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character (U.S. Department of the Interior, National Park Service, Technical Preservation Services 2017).

DGS has considered rehabilitation of the Resources Building; however, rehabilitation has been ruled out as infeasible because the key building systems and materials would be impacted to address the code, seismic, fire/life safety, and hazardous material issues. Due to the type, age, and anticipated disturbance to building materials and systems, the ability to reuse building elements is mostly very limited. The following issues make rehabilitation of the building infeasible.

- Hazardous Materials Abatement
  - The piping insulation and the fireproofing throughout the building contains asbestos. Fireproofing is installed to the underside of all decks, within elevator shafts, and potentially other residual locations. The necessary removal of asbestos-containing materials would require demolition and removal of materials throughout the entire building.
  - There are PCBs confirmed in the exterior sealants between the exterior precast panels and there is potential that PCBs have leached into the panels; this is still being investigated. The removal of PCBs would impact the exterior of the building and may make reuse of the exterior panels unsafe.
- Deficient Mechanical, Electrical, Piping, and IT/AV Cabling Systems
  - These systems are obsolete. They were designed to rely on abundant and inexpensive energy and are inefficient.
  - The IT/AV systems do not adequately accommodate current communication needs.
  - The equipment for these systems has far exceeded the life cycle outlined by each manufacturer.
  - Because of the prevalence of asbestos-containing materials throughout the building, the systems have not been maintained and upgraded over the years. Full replacement is necessary.
  - These systems are installed throughout the entire building. The first floor is the entry point with mechanical, data, and electrical rooms housing equipment/panels with the systems then distributed throughout each floor. To access, remove, and replace these systems, the interior of the building needs to be gutted (i.e., remove walls, ceilings, partitions etc.).
- Structural and Seismic Upgrades
  - The original building was designed 50+ years ago; it does not meet current seismic code requirements as dictated in the California Building Code.
  - The building must be retrofitted to ensure performance during a seismic event and to bring it into compliance with current codes.
  - The exterior panels' seismic capacity is not up to current standards. In a seismic event, panels could be damaged, displaced, or could even fail and fall off the building. If panels were to remain in place, they would need seismic retrofitting. However, the exterior panels have been a source of leaks over the years and cannot be adequately repaired.
  - The weight of the exterior panels is an issue; the panels currently represent approximately 20 percent of the building weight. The building requires a lighter-weight exterior envelope due to the structural and seismic requirements. Removal of the panels would take a large load off the building structure. If some type of similar paneling were replaced, the building structure would need additional improvements to address the gravity load, which is not anticipated to be needed for the proposed building design.
  - To address the necessary structural and seismic upgrades, the steel beams need to be accessed for bracing and structural dampers.

- Building Performance
  - To achieve the State's sustainability/energy efficiency goals of LEED and Green Certification, it requires new energy efficient building materials rather than reusing existing materials, which would hinder this goal. A modern-high-performance building envelope is necessary and would be more durable and will save energy.
  - If the existing pre-cast exterior panels were reinstalled, they would not be warranted by the design-builder because the weather-proofing and seismic performance could not be guaranteed.
  - The State and the building occupants identified good daylighting (bringing natural light as far into the building space as possible) as a very high priority. To achieve this goal, additional window area must be provided. If the existing pre-cast exterior panels were reinstalled, it would inhibit the desired daylighting, which is part of the LEED and Green Certification.
  - It is a goal of the project to have a safe/comfortable/efficient workspace for State workers. This includes interior program requirements, including acoustics, temperature control, and air quality, which are controlled by the choice and design of construction materials. The reuse of existing building materials would hinder this goal.
  - The existing layouts of internal building spaces are inefficient. New open layouts would be designed to maximize daylighting and minimize noise.
- Costs
  - Attempting to remedy the feasibility issues above with more expensive building treatments would not be impossible. However, such treatments would increase the project costs by at least 25 percent, and likely more, making the cost of the project infeasible for the State.
- Benefits of a Renovated/New Building

  DGS is requiring that the building design reflect the historic architectural International Building style. The proposed comprehensive tear-down and rebuild of the Resources Building would not allow for rehabilitation of all the building's historic architectural elements (due to materials being out of compliance with code, past their lifecycle, inefficient, and containing hazardous materials). However, DGS determined that the following project objectives are critical and meeting these project objectives outweighs meeting the rehabilitation standards:
  - protect the health and safety of the Resources Building occupants;
  - correct fire and life safety deficiencies and provide a complete upgrade of all the building's infrastructure systems;
  - extend the useful life and viability of the Resources Building;
  - provide a modern, efficient, and safe environment for State employees and the public they serve;
  - integrate the new State development with the existing neighborhood;
  - develop a sustainable and energy-efficient building;
  - design a building that is respectful of the existing historic Leland Stanford Mansion State Historic Park; and
  - make the building safe while honoring the historical qualities of the building.

Comment A4-3

The DEIR does not contain any information about the intended architectural treatment of the Resources Building as part of the retrofit design. Although the DEIR includes the statement that the "renovation would be designed to address the building's historic character," a bit more discussion of what the design treatment would be is needed. For example, will the new design treatment make any reference to the existing building in terms of window patterning, void-to-solid patterning, architectural materials, color? Would any exterior cladding be reincorporated into the new design skin in any way to establish a tangible visual link, in design terms, between the retrofitted building design

treatment and the current building? If not, DGS is missing an additional mitigation opportunity to address the comprehensive teardown of the building.

Response A4-3

DGS will require the design-build team to design the Resources Building Renovation in the post-war International Style, to fit within the modern Sacramento landscape, and the key historic character defining features of the existing Resources Building have been documented. The design-build team must follow the post-war International Style for all new design that replaces character defining features. The characteristics of this style include:

- Honest expression of structure
- Simple geometric forms
- Horizontal massing
- Flat roofs
- Use of mass-produced materials and industrial technologies
- Smooth wall surfaces
- Minimal ornamentation, emphasizing building elements
- Horizontal bands of flush windows
- Floor-to-ceiling windows
- Open interior spaces
- Integration of indoor and outdoor spaces

Integrated designed landscapes are characteristic of government buildings constructed in the post-war International Style. All new landscape design that replaces character defining features must reflect the following characteristics:

- Design and materials emphasis on accessibility, circulation, and ease of maintenance
- For post-war International Style, hardscaped plazas of concrete, aggregate paving, and/or brick typically predominate over softscape
- Simple geometric configurations with strong visual connection to building
- Open plaza and walkway elements
- Integral geometric planters and otherwise constrained/defined planting areas
- Integral site furnishings and other hardscape elements as pragmatic sculptural accents
- Freestanding light fixtures

Comment A4-4

The Stanford Mansion - Mitigation Measures 4.3-4a (construction-period falling impacts due to the teardown of the Resources Building) and 4.3-4b (construction-period vibrational impacts) have been proposed to protect this highly significant resource. These measures appear to be adequate, however, the need, ahead of the start of the construction process, to develop a careful vibration control plan needs to be emphasized. Such a plan should be based upon expert guidance from a vibration control consultant with documented expertise designing projects in sensitive historic settings.

Response A4-4

The text of page 4.3-25 in Section 4.3, "Archaeological, Historical, and Tribal Cultural Resources," "Mitigation Measure 4.3-4b: Vibration Monitoring," is hereby revised as follows:

Mitigation Measure 4.3-4b: Vibration Monitoring

Although there is no anticipated substantial adverse change to the Stanford Mansion from vibration impacts from the project, Mitigation Measure 4.9-2 of this Draft EIR requires the development and implementation of a vibration control plan, which shall be applicable to construction activities located within 30 feet of any building or within 80 feet of an occupied building, such as the Leland Stanford Mansion.

A vibration control plan shall be developed by a vibration control consultant with documented expertise designing projects in sensitive historic settings ~~the design-build team~~ to be submitted to and approved by DGS before initiating any construction activities within the type and distance parameters identified above. Applicable elements of the plan will be implemented before, during, and after construction activity. The plan shall consider all potential vibration-inducing activities that would occur and require implementation of sufficient mitigation measures to ensure that the existing Leland Stanford Mansion State Historic Park, or other buildings, would not be exposed to vibration levels that would result in damage to the building.

The text in Section 4.9, "Noise," Mitigation Measure 4.9-2: Develop and Implement a Vibration Control Plan," is hereby revised as follows:

Mitigation Measure 4.9-2: Develop and Implement a Vibration Control Plan

This mitigation measure shall be applicable to construction activities located within 30 feet of any building or within 80 feet of an occupied building, such as the Leland Stanford Mansion or a nearby office building.

A vibration control plan shall be developed by a vibration control consultant with documented expertise designing projects in sensitive historic settings ~~the design-build team~~ to be submitted to and approved by DGS before initiating any construction activities within the type and distance parameters identified above. Applicable elements of the plan will be implemented before, during, and after construction activity. The plan shall consider all potential vibration-inducing activities that would occur and require implementation of sufficient mitigation measures to ensure that the existing Leland Stanford Mansion State Historic Park, or other buildings, would not be exposed to vibration levels that would result in damage to the building or substantial human disturbance. Items that shall be addressed in the plan include, but are not limited to, the following:

…

Comment A4-5

Per Mitigation Measure 4.3-4c (repair of inadvertent damage), I would recommend that any repair treatment plan would best be coordinated under the supervision of a qualified preservation architect, rather than by an architectural historian working singly.

Response A4-5

The text of page 4.3-25 in Section 4.3, "Archaeological, Historical, and Tribal Cultural Resources," "Mitigation Measure 4.3-4c: Repair Inadvertent Damage," is hereby revised as follows:

Mitigation Measure 4.3-4c: Repair Inadvertent Damage

If project-related demolition or construction activities results in inadvertent damage of historic elements of the Stanford Mansion, the State shall repair them in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Inadvertent damage is any damage that results in a significant impact to a historical resource within the meaning of CEQA Guidelines Section 15064.5(b)(2) or adverse effects to historic properties within the meaning of 36 C.F.R. Part 800.5(a)(1). All repairs shall be reviewed and approved by a qualified architectural historian ~~or historic architect~~ under the supervision of a qualified preservation architect (both meeting the appropriate Secretary of Interior's Professional Qualification Standards) prior to determining that the treatment has been adequately implemented.

Comment A4-6

Resources Building Archival Recordation Documentation – Mitigation Measure 4.3-4d: I would recommend a rewording of the discussion of the HABS photo documentation to state that a minimum, rather than a maximum, of 30 large format images be made of the Resources Building exterior and interior. There should be as many views as necessary to sufficiently document the property.

Response A4-6

The text of page 4.3-26 in Section 4.3, "Archaeological, Historical, and Tribal Cultural Resources," "Mitigation Measure 4.3-4d: Preparation of Archival Recordation Documentation," is hereby revised as follows:

Mitigation Measure 4.3-4d: Preparation of Archival Recordation Documentation

DGS shall ensure that prior to any building alteration or demolition activities, the Resources Building shall be the subject of recordation by photography and written historical data following the standards of the Historic American Buildings Survey (HABS). HABS Level II documentation shall be implemented, which includes large-format archival photographs and written data and shall include historic plans of the building and associated landscape features. Archival photographs to sufficiently document the property shall include ~~up to~~ approximately 30 views of the Resources Building including contextual views of the building within its setting, along with exterior, interior, and detail views of character-defining features. The HABS documentation shall be completed by a qualified professional who meets the standards for History or Architectural History set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The draft documentation shall be submitted for review and approval by DGS. The final documentation shall be distributed or offered to the SHPO, DGS, and the appropriate interested parties, which may include, but is not limited to historical organizations.

Comment A4-7

As part of Mitigation Measures 4.3-4e (Interpretive Panels/Displays) and 4.3-4f (Oral History Project) DGS is proposing to create permanent interpretive exhibits on the interior and exterior of the renovated building designed for durability, placed in pedestrian-friendly locations, with attractive design features. The opportunity to reutilize some of the existing building fabric proposed for removal to create such exhibits should be explored, as this would create a tangible link between the existing building and the newly retrofitted building for visitors to the property.

The oral history component is to be overseen by a qualified historian and calls for the Center for Sacramento History and other museum and historical societies to be afforded the opportunity to comment on the research design. It further states that the project should conform to The Principles for Oral History and Best Practices for Oral History (October 2009) and the information should be recorded on archival quality Gold CD-Rs prior to dissemination to local repositories. These appear to be well-accepted best practices and will be helpful in addressing the loss of the current architectural resource.

Response A4-7

The text of page 4.3-26 in Section 4.3, "Archaeological, Historical, and Tribal Cultural Resources," "Mitigation Measure 4.3-4e: Interpretive Panels and/or Signage," is hereby revised as follows:

Mitigation Measure 4.3-4e: Interpretive Panels and/or Signage

DGS shall prepare two or more interpretive exhibits, signs, and or plaques that provide information regarding the history, construction, and subsequent use of the Resources Building and the California State Capitol Plan, and shall include information regarding the Modernism and International architectural styles. The interpretive exhibits would use images, narrative history, drawings, or other material produced for the archival recordation documentation mitigation (Mitigation 4.3-4d), oral histories (Mitigation Measure 4.3-4f), documentation collected from the time capsule embedded in the cornerstone of the building, or other archival resources. DGS will reuse existing building materials, as feasible, in the exhibits to create a tangible link between the existing building and the renovated building. The interpretive exhibits may be in the form of, but are not necessarily limited to, interpretive display panels, and/or printed material for dissemination to the public. The interpretive

exhibits shall be installed within interior public spaces of the renovated Resources Building and ~~should~~ shall be integrated into the design of the outdoor public areas. Interpretive displays and the signage/plaques installed outdoors ~~should~~ shall be sufficiently durable to withstand inclement weather conditions of the site for at least ten years, like fiber-glass embedment panels, that meet National Park Service signage standards. Displays and signage/plaques shall be lighted, installed at pedestrian-friendly locations, and be of adequate size to attract the interested pedestrian. Maintenance of displays and signage/plaques shall be included in the management of the common area maintenance program on the property.

The text of page 4.3-26 in Section 4.3, "Archaeological, Historical, and Tribal Cultural Resources," "Mitigation Measure 4.3-4e: Interpretive Panels and/or Signage," is hereby revised as follows:

Mitigation Measure 4.3-4f: Oral History Project

Prior to any structural demolition and construction activities, one or more persons meeting the Secretary of the Interior's Professional Qualification Standards under History and Architectural History shall assemble important personal histories of persons knowledgeable about history and Modernism and International design of the Resources Building, and the design, adoption, and implementation of the California State Capitol Plan. An oral history project to record their stories would be a valuable resource and assist with interpretative and educational exhibits, (Mitigation 4.3-4e, and archival recordation documentation (Mitigation 4.3-4d). The Center for Sacramento History, and other local museum and historical societies, shall be given the opportunity to comment on the research design for any oral history project. The research design would identify anticipated informants, research goals, and protocols. Any oral history research and interviews ~~should~~ shall be conducted in conformance with the Principles for Oral History and Best Practices for Oral History (October 2009). CDs prepared during any oral history project ~~should~~ shall be recorded on archive quality discs, such as archival gold CD-Rs, and disseminated to local repositories. The oral history project shall be available at the Resources Building when occupancy begins.

Comment A4-8

Bearing in mind the concerns / recommendations presented above, in general, I think the potential impacts to built historic resources and possible subsurface cultural resources have been thoughtfully considered, and the proposed mitigation measures are appropriately detailed in a majority of cases.

Thank you again for affording the opportunity to comment on the project.

Response A4-8

DGS appreciates the City's input on the treatment and mitigation of the built historic resources related to the Resources Building Renovation Project and has revised the project-related mitigation measures as necessary address the City's concerns.

Letter A5 City of Sacramento, Department of Public Works, Transportation Division

Pelle Clarke, Senior Engineer
May 11, 2020

Comment A5-1

Thank you for including the City of Sacramento in the environmental review process for the project referenced above. The proposed project would involve the renovation of the existing 17-story Resources Building located at 1416 9th Street, in downtown Sacramento. The project site is bounded by N Street on the north, 9th Street on the east, O Street on the south, and 8th Street on the west. Neighbors Alley and the northeastern portion of the block is included in the project, although the northwestern portion of the block is not part of this project. The renovation does not substantially increase the workable space for employees; however, renovation would lead to employee housing efficiencies that would allow the building to accommodate an additional 100 employees. This would yield an increase in employees from 2,400 to 2,500 employees. The project would involve a comprehensive tear-down, leaving the building's steel frame, then reinforcement/rebuild matching the current footprint, mass, and height.

The City of Sacramento Department of Public Works has the following comments on the Draft EIR for this project:

1. The City of Sacramento's Central City Specific Plan integrates a number of planned transportation improvements and programs to further enhance the downtown grid. In the vicinity of the proposed project, the future infrastructure improvements include but are not limited to:
   - 8th Street lane reduction from 3 lanes to 2 lanes adjacent to the project site;
   - N Street conversion from an eastbound 1-Way vehicle travel to 2-Way vehicle travel; including the section of N Street that bounds the project site on the north between 9th Street and 8th Street.
   - Pedestrian network improvements within the vicinity of the project site;
   - 9th Street protected bike lane adjacent to the project site;
   - Class II Bike Lane along N Street adjacent to the project site;
   - Transit investments along 8th and 9th Street adjacent to the project site.

   Please coordinate any off-site improvement plans with City of Sacramento Department of Public Works.

Response A5-1

The City's future infrastructure improvements are included in the cumulative impact analysis in Chapter 5 of the Draft EIR. These improvements are listed in Section 5.2.4, "Related Projects," and are considered in the cumulative transportation and circulation impacts in Section 5.3.2, "Transportation and Circulation." The Resources Building Renovation Project does not include permanent modifications to the surrounding transportation infrastructure system and would not conflict with future implementation of Grid 3.0 elements. In addition, the State will implement Mitigation Measure 4.4-5 to improve the pedestrian crossings at the O Street/8th Street and O Street/9th Street intersections.

Comment A5-2

2. Access to driveways shall be constructed in conformance with the City's driveway standards, Standard Construction Specifications, and to the satisfaction of the Department of Public Works. Improvements required shall be determined by the City. This shall include street lighting and the repair or replacement/reconstruction of any existing deteriorated curb, gutter and sidewalk fronting the property per City standards and to the satisfaction of the Department of Public Works.

Response A5-2

Project-related driveways would be constructed in conformance with the City's driveway standards, Standard Construction Specifications, and to the satisfaction of the Department of Public Works.

Comment A5-3

3. Any abandonment of the streets must be coordinated with the City of Sacramento Department of Public Works.

Response A5-3

As stated in Section 1.4.2, "Required Permits and Approvals," and in Section 4.2.4, "Land Use," of the Draft EIR, the project may include abandonment of Neighbors Alley by the City, transfer to State ownership, and utility easements, and that as a responsible agency, the City would use this EIR for discretionary actions such as sidewalk or roadway encroachment permits, potential abandonment of Neighbors Alley. DGS will coordinate with the City of Sacramento Department of Public Works on any proposed abandonment of Neighbors Alley.

Comment A5-4

4. Mitigation Measure 4.4 -5: Improve Pedestrian Crossings at the O Street/8th Street and O Street/9th Street Intersections. Any modifications to the City of Sacramento intersections are subject to review and approval of the City of Sacramento Department of Public Works. A signal design concept report (DCR) must be submitted to the Transportation Division. In addition to the improvements listed in the DEIR, such as marked crosswalks, warning

devices, and pedestrian signal heads, the improvements may include ADA ramps, pre-emption equipment, and/or other modifications.

Response A5-4

As stated in Mitigation Measure 4.4-5, final designs for all pedestrian crossing improvements are subject to review and approval by the City of Sacramento Traffic Engineer. A DCR shall be prepared for the pedestrian safety improvements and submitted to the City for review and approval. The improvements shall be designed in compliance with ADA standards. Furthermore, the pedestrian crossing improvements shall be completed before the State Fire Marshal issuance of a certificate of occupancy. Implementation of Mitigation Measure 4.4-5 would reduce significant impacts associated with pedestrians to a less-than-significant level by improving pedestrian safety at the two intersections closest to the project site through improved crosswalks and warning signage for pedestrians and motorists.

Comment A5-5

5. The proposed project is required to comply with Sacramento City Code Section 12.20.020 to prepare a traffic control plan for any construction activities that may obstruct vehicular or pedestrian traffic on city streets. The plan is subject to review and approval of the City of Sacramento Director of Department of Public Works. City Code Section 12.20.030 outlines the minimum requirements for information that must be provided in the traffic control plan. The project site is adjacent to a light rail station which is a pedestrian generating use; thus, the City recommends the project divert shared-use traffic in lieu of closing sidewalks and bike lanes during construction activities. The City recommends maintaining shared-use facilities during construction to accommodate multiple modes of transportation and include these facilities in the required traffic control plan. The traffic control plan is subject to review and approval of the City of Sacramento director of Department of Public Works.

Response A5-5

As stated on page 3-6 and discussed in Impact 4.4-6, "Construction-Related Impacts," in accordance with Section 12.20.20 of the Sacramento City Code, DGS or its selected contractor would prepare a construction traffic management plan, which is subject to approval by the City of Sacramento Traffic Engineer and subject to review by all affected agencies, including California Highway Patrol and City of Sacramento Fire and Police Departments. The plan would be designed to ensure acceptable operating conditions on local roadways, pedestrian and bicycle facilities, and transit studied as a part of this EIR and affected by construction traffic. At a minimum, the plan shall include a:

- description of trucks, including number and size of trucks per day, expected arrival/departure times, and truck circulation patterns;
- description of bicycle and pedestrian facility closures, including duration, advance warning and posted signage, safe and efficient access routes for emergency vehicles, and use of manual traffic control;
- description of driveway access plan, including provisions for safe vehicular, pedestrian, and bicycle travel; minimum distance from any open trench; special signage; and private vehicle accesses.
- description of provisions to ensure operation of and access to light rail lines on O Street and the bus transit stops on 8th Street and 9th Street in close proximity to the project site.

A copy of the construction traffic management plan shall be submitted to local emergency response agencies and transit providers, and these agencies shall be notified at least 30 days before the commencement of construction that would partially or fully obstruct roadways. The project site is located within the downtown street grid; therefore, various alternative vehicle, pedestrian, and bicycle routes are available to access the project area and nearby locations in response to temporary access disruptions during construction. As discussed in Impact 4.4-6 of the Draft EIR, the sidewalk access along O Street would be maintained with a protective tunnel to support pedestrian access to the O Street transit stop, and the transit lines and vehicular access on O Street would be maintained. Vehicular, pedestrian, and bicycle access to the Leland Stanford Mansion, apartments, and office buildings and other uses in the vicinity of the Resources Building would be maintained at all times.

Comment A5-6

6. Pursuant to City Code Section 17.700.060, a Transportation System Management Plan is required. The Transportation System Management Plan shall be subject to review and approval by the City of Sacramento, Department of Public Works.

Response A5-6

DGS has incentives in place to encourage non-auto transportation, use of transit, bicycle parking, ride sharing, teleworking, and the like, that currently apply to the Resources Building and would continue to apply with implementation of the proposed project. Furthermore, the project-related increase of 100 employees would result in minor increases in transportation demands, as addressed in Section 4.3 of the Draft EIR. As discussed in Impact 4.4-3, the project would generate demand for 22 additional AM peak hour transit trips and 23 additional PM peak hour transit trips due to 100 new employees. Because the project area is served by multiple and substantial transit services, the increase in demand would be accommodated by existing available transit. The project would result in a minor increase in automobile (37 trips in the AM and 40 trips in the PM peak hour), bicycle (4 trips in each peak hour), and pedestrian (2 trips in the AM and 3 trips in the PM peak hour) trips and, therefore, would not adversely affect light rail or bus operations. Potential transit users would be able to access the nearby light rail stations and bus stations by utilizing existing sidewalks and crosswalks. Furthermore, State employee mode share surveys indicate that a substantial number of State employees within the Central City use non-auto commute modes. As a State office building, the employees in the renovated building would have access to a transportation commute program with a transportation commute coordinator, a statewide telework policy, and an alternate work week program open to all employees with the permission of their management. As explained in the Draft EIR (page 4.4-2), the Resources Renovation Project is located on State-owned property, has been authorized and funded by the State of California through the State Projects Infrastructure Fund, and would be implemented by the California Department of General Services (DGS). State agencies are not subject to local plans, policies, and zoning regulations. Therefore, DGS is not subject to City Code Section 17.700.060 and DGS does not anticipate submitting a Transportation System Management Plan to the City.

Comment A5-7

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development and we would like to be included on early review of the proposed project site plan.

If you have any questions regarding these comments, please contact Aelita Milatzo at (916)-808-1953 or by email at amilatzo@cityofsacramento.org.

Response A5-7

DGS appreciates the City Department of Public Works, Traffic Engineering, input. DGS and the project planners and engineers will continue to coordinate with the City regarding the local transportation network.

Letter A6 City of Sacramento, Department of Public Works, Urban Forestry

Kevin A. Hocker, City Urban Forester
May 11, 2020

Comment A6-1

I have no comments on the adequacy of the draft EIR. I would just like to point out for your consideration that while the project description includes the removal of all trees and landscaping both within the property boundaries and within the public right-of-way, it appears that there may be an opportunity to retain several large mature trees both within the property and within the public right of way, on the northern portion of the project that is described in the project as being a storage and staging area. I encourage the project planners to consider retaining mature trees in this area where it is possible and feasible to do so, and would like to remind them that in the case or removal of city trees the director must consider whether there are reasonable means of accomplishing the applicant's goal with less impact to the tree before rendering a decision to issue a permit to remove a city tree under Sacramento City Code 12.56.050.

Response A6-1

DGS appreciates your review and input on retaining and protecting trees on the Resources Building Renovation Project site.

As addressed in Impact 4.11-3 of the Draft EIR, the project would result in the removal of trees within the State-owned landscaped areas as well as City street trees. It is DGS's intent to retain/saved as many trees as possible within the boundaries of the project during the demolition and rebuild of the Resources Building. However, preliminary site logistics plans, total skin removal, pedestrian safety, and location of the construction site indicates that many of the onsite trees would be impacted. Recognizing this, considerable effort has been placed on designing the surrounding landscape and plaza areas to be in the international modern style, which incorporates trees (existing/new) in the site design. Vegetation would be chosen to address shade, drought-tolerance, the long-term health and sustainability of the entire remodeled area, and to avoid heat islands.

Mitigation Measure 4.11-3 requires that before commencement of tree removal and other site preparation and demolition activities, DGS will complete a survey of trees at the project site and any other areas affected by excavation (e.g., utility work), demolition, and construction, and prepare and submit a detailed tree removal, protection, replanting, and replacement plan for the City street trees to the City arborist. The City street tree removal plan will be developed by a certified arborist. Implementation of this mitigation measure would reduce potentially significant impacts associated with City street tree removal to a less-than-significant level by providing replacement trees and complying with the City's Tree Preservation Ordinance.

Letter A7 Shingle Springs Band of Miwok Indians

Kara Perry, Site Protection Manager, Cultural Resources Department
June 26, 2020

Comment A7-1

I did have a chance to review the EIR for the Resources Building. At this point we do not agree that with the mitigation measures it would be considered less-than-significant. Our thought on this is that whenever something is found the Tribe considers it significant. We can see why the measures are put in place but cannot in good conscience agree that they lessen any damages caused by inadvertent discoveries. As I am sure you are aware the Tribe considers the entire area to be of great significance and extremely sensitive for cultural resources. If you would please add this to the comments for the EIR. Please keep us updated as to the timeframe for ground disturbance so we can have a Tribal monitor present.

Response A7-1

DGS appreciates Shingle Springs' review of the Resources Building Renovation Project Draft EIR and acknowledges receipt of the comment via email.

In regard to concerns regarding the significance of tribal cultural resources, DGS is working within the legal constructs of the relevant portions of the Public Resources Code (PRC), and more specifically, CEQA and AB 52. Per AB 52, the Legislature added new requirements regarding tribal 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 tribal cultural resource is a project that may have a significant effect on the environment." (PRC Section 21084.2)

A Tribal Cultural Resource is defined in PRC Section 21074 (a)(1)(A)-(B) as:

- A site feature, place, cultural landscape, sacred place or object, which is of cultural value to a tribe
- AND is either: On or eligible for the CA Historic Register or a local historic register,
- OR the lead agency, at its discretion, chooses to treat the resource as a TCR and this decision is supported by substantial evidence.

Per Appendix G of the State CEQA Guidelines, the evaluation of TCRs under CEQA addresses the following:

Would the project cause a substantial adverse change in the significance of a TCR, 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, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
- 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.

Section 4.3 of the Draft EIR, "Archaeological, Historical, and Tribal Cultural Resources," presents the applicable regulations, the known existing environmental setting, and analyzes the project's potential to impact known and unknown cultural resources. Key to the analysis within the current legal constructs are the following questions:

- Are designated TCRs present at the project site?
- Is a site, feature, place, or cultural landscape eligible for designation as a TCR, but not yet designated, present at the project site?
- Is there substantial evidence that a previously undiscovered site or feature, eligible to be a TCR, is present on the project site?
- Would the project cause a substantial adverse change in the significance of a TCR or a site, feature, place, or cultural landscape eligible for designation as a TCR.

As stated on page 4.3-17 of the Draft EIR, under "Tribal Cultural Resources," the record search results indicate the study area is encompassed within the Sacramento River Tribal Cultural Landscape (TCL P-34-005225), identified by the Nisenan as Hoyo Sayo/Tah Sayo (UAIC) and the Plains Miwok as Waka-ce/Waka-Ly (Wilton Rancheria). However, the study area does not embody any of the contributing characteristics of the TCL, namely, waterways, tule habitat, fisheries, and other wildlife. As such, defining or contributing elements of the TCL would not be affected by renovation of the Resources Building. Furthermore, no additional TCRs within the PRC definition are recorded within the study area. There is also no substantial evidence that a previously undiscovered site or feature, eligible to be a TCR, is present on the project site. The EIR acknowledges that there is clear evidence of ongoing precontact and historic Native American occupation of downtown Sacramento, and sites or features eligible to be a TCR have been found during subsurface excavations in the downtown area. However, there have also been many subsurface excavations in the downtown area that have not encountered sites or features that would qualify as a TCR. No physical evidence has been found or documented at the project site to indicate that subsurface resources that would qualify as a TCR, within the PRC definition, are present.

The EIR acknowledges the potential for previously unknown subsurface material, that could qualify as a TCR, to be discovered during ground disturbance at the project site. However, Mitigation Measures 4.3-1 and 4.3-2 provide multiple layers of avoidance and minimization actions so that if a feature that could quality as a TCR is encountered, there is not a "substantial adverse change in the significance of the TCR."

DGS recognizes Shingle Springs' desire to monitor ground disturbing activities related to the project. Please note that the text on page 4.3-21 in Mitigation Measure 4.3-1, "Monitoring and Response Measures for Potential Unknown Historic Archaeological Resources," is hereby revised as follows:

Mitigation Measure 4.3-1: Monitoring and Response Measures for Potential Unknown Historic Archaeological Resources

A cultural resources awareness training program ~~will~~ shall be provided to all ~~construction~~ on-site personnel active on the project site during earthmoving activities. The first training ~~will~~ shall be provided prior to the initiation of ground-disturbing activities. The training ~~will~~ shall be developed and conducted in coordination

with a qualified archaeologist meeting the U.S. Secretary of the Interior guidelines for professional archaeologists and consulting Native American tribes. The program shall include relevant information regarding sensitive cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program shall also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and shall outline what to do and whom to contact if any potential archaeological resources or artifacts are encountered.

Where ground-disturbing activities occur in native soils, or there is no evidence of extensive past ground disturbances, a qualified archaeologist meeting the U.S. Secretary of the Interior guidelines for professional archaeologists ~~will~~ shall monitor ground-disturbing activities. If evidence of any historic-era subsurface archaeological features or deposits ~~are~~ is discovered during construction-related earthmoving activities (e.g., ceramic shard, trash scatters, brick walls), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can ~~access~~ assess the significance of the find. If after evaluation, a resource is considered significant, all preservation options shall be considered as required by CEQA, including possible data recovery, mapping, capping, or avoidance of the resource. If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. However, if historic-era artifacts are found to be associated with Native American tribal members, they shall be evaluated and treated consistent with the process identified in Mitigation Measure 4.3-2. 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, and distributes this information to the public.

Significance after Mitigation

Implementation of this mitigation measure would reduce Impact 4.3-1 to a **less-than-significant** level by requiring preconstruction training, construction monitoring, and, in the case of a discovery, preservation options (including data recovery, mapping, capping, or avoidance) and proper curation if significant artifacts are recovered.

In addition, the text on page 4.3-22 in Mitigation Measure 4.3-2, "Monitoring and Response Measures for Potential Unknown Prehistoric Archaeological Resources and Tribal Cultural Resources," is hereby revised as follows:

Mitigation Measure 4.3-2: Monitoring and Response Measures for Potential Unknown ~~Prehistoric~~ Precontact Archaeological Resources and Tribal Cultural Resources

This mitigation measure expands on the actions included in Mitigation Measure 4.3-1 to also address encountering unknown ~~prehistoric~~ precontact archaeological and tribal cultural resources.

A representative or representatives from a culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the cultural resources awareness training program included in Mitigation Measure 4.3-1. The program will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and behaviors, consistent with Native American Tribal values.

Where ground disturbing activities occur in native soils, or there is no evidence of extensive past ground disturbances, or evidence suggests that imported soils have a high probability of containing artifacts and materials of importance to tribal entities, a qualified archaeologist and Native American tribal monitor(s) will monitor ground-disturbing activities. ~~Native American representative(s) will be invited to observe any excavations.~~ Interested Native American Tribes will be provided at least seven days' notice prior to the initiation of ground disturbing activities. If any previously undisturbed native soil is imported to the project site for fill or other purposes, the archaeologist and the ~~Native American representative(s)~~ tribal monitor(s) will also monitor handling and placement of this material to determine if archaeological material may be imported with the native soil. The determination for initiating or ending monitoring disturbance of imported soils will be made

based on coordination between the qualified archeologist and ~~Native American~~ tribal monitor(s), with a final determination made by DGS.

If evidence of any ~~prehistoric~~ precontact subsurface archaeological features or deposits are discovered during construction-related earth-moving activities (e.g., lithic scatters, midden soils), all ground-disturbing activity in the vicinity of the discovery shall be halted until a qualified archaeologist and Native American representative can assess the significance of the find. If after evaluation, a resource is considered significant, or is considered a tribal cultural resource, all preservation options shall be considered as required by CEQA, including possible data recovery, mapping, capping, or avoidance of the resource. If artifacts must be recovered from significant ~~prehistoric~~ precontact archaeological resources, they shall be transferred to an appropriate tribal representative, or housed at a qualified curation facility. If artifacts or other materials must be removed, preference shall be given to transferring materials to an appropriate tribal representative and re-interring the material at a location on the project site. 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, and distributes this information to the public.

Finally, in regard concern regarding the discovery and treatment of human remains, DGS is proceeding in accordance with the relevant portions of the California Public Resources Code (PRC), and more specifically, CEQA and AB 52, in assessment of impacts to historical, archaeological, and tribal cultural resources (TCRs). (Please see Response A1-2, above regarding TCRs defined in PRC Section 21074 (a)(1)(A)-(B).) CEQA requires DGS, as lead agency, to determine the significance of environmental impacts (PRC Section 21082.2; State CEQA Guidelines Section 15064) and grants it the authority to mitigate (State CEQA Guidelines Section 15041).

The conclusion of Draft EIR Impact 4.3-3, "Potential Discovery of Human Remains," is based on reasoned analysis and substantial evidence in the record (CEQA Guidelines Sections 15064.7(b) and 15384). As described in the discussion of Impact 4.3-3, there are no known cemeteries or burials at the project site and, because the site is developed with the existing Resources Building, soils are previously disturbed with no known human remains being found. Bone fragments found during preconstruction ground disturbance at the Resources Building site were evaluated and determined to not be human bone fragments. Like TCRs (see Draft EIR Impact 4.3-2), there is no evidence to suggest that human remains are present at the project site. However, in its conclusion of Impact 4.3-3, DGS acknowledges the potential for inadvertent disturbance of human remains during construction (Draft EIR Impact 4.3-3). Consistent with California Health and Safety Code Section 7050.5(a), DGS defines disturbance of human remains as knowingly mutilating or disinterring, wantonly disturbing, or willfully removing human remains in or from any location other than a dedicated cemetery without authority of law. Consistent with CEQA Guidelines Section 15064.5(e), Draft EIR Mitigation Measure 4.3-3 directly, and Mitigation Measure 4.3-2 indirectly (i.e., that focus is not on human remains but actions to protect other resources that would also result in protecting encountered human remains) provide multiple layers of avoidance and impact minimization actions. Mitigation Measure 4.3-3, "Response Protocol in Case Human Remains are Uncovered," is consistent with the California Health and Safety Code 7050.5(b) and (c) and the California Native American Historical, Cultural, and Sacred Sites Act in requiring that, if suspected human remains are found during project construction, all work shall be halted in the immediate area, the county coroner shall be notified to determine the nature of the remains, and if remains are determined to be Native American the coroner shall contact the Native American Heritage Commission (NAHC) who shall assign a Most Likely Descendent (MLD). Furthermore, Mitigation Measure 4.3-3 reflects CEQA Guidelines Section 15064.5(d) and PRC Section 5097.98, which establish the ability for DGS to "develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission." CEQA Guidelines Section 15064.5(d)(2) goes on to state that action implementing such an agreement is exempt from the requirements of CEQA.

DGS acknowledges the stated perspective that any disturbance of human remains is a significant effect for which no mitigation can compensate. However, DGS is following the State CEQA Guidelines, PRC, and Health and Safety Code in its determination of significance and, based on substantial evidence, the effectiveness of mitigation. As articulated in the Draft EIR, every effort will be made by DGS to avoid disturbance of cultural resources, including human remains, and—if avoidance cannot be achieved—to appropriately reinter remains with applicable tribal consultation, and with dignity and respect.

3 REVISIONS TO THE DRAFT EIR

This chapter presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections to information in the Draft EIR. Changes in the text are signified by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

3.1 PROJECT MODIFICATIONS

There have been no modifications to the Resources Building Renovation Project, as described in Draft EIR Chapter 3, "Project Description," since publication of the Draft EIR on March 27, 2020.

3.2 REVISIONS TO THE DRAFT EIR

This section presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number.

3.2.1 Revisions to Chapter 2, Executive Summary

Revisions to Table 2-1, "Summary of Impacts and Mitigation Measures," of Chapter 2, "Executive Summary," are addressed in Sections 3.2.2 and Section 3.2.3 of this Final EIR.

3.2.2 Revisions to Section 4.3, Archaeological, Historical, and Tribal Cultural Resources

The text in Section 4.3, "Archaeological, Historical, and Tribal Cultural Resources," Section 4.3.1, "Regulatory Setting," page 4.3-5 is hereby revised as follows:

~~California Native American Historical, Cultural, and Sacred Sites Act~~

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

Health and Safety Code, Sections 7052 and 7050.5

Section 7052 of the Health and Safety Code states that the disturbance of Native American cemeteries is a felony. Section 7050.5 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 determined to be Native American, the coroner must contact the NAHC.

Public Resources 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 burial falls within the jurisdiction of the Native American Heritage Commission (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.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (PRC 5097.9-5097.991) applies to both state and private lands. The Act requires that upon discovery of human remains, construction or excavation activity cease and the County coroner be notified. If the remains are of a Native American, the coroner must notify NAHC, which notifies and has the authority to designate the most likely descendant (MLD) of the deceased. The Act stipulates the procedures the descendants may follow for treating or disposing, with appropriate dignity, human remains and any items associated with Native American burials.

The text on page 4.3-17 of the Draft EIR, is hereby revised as follows:

Tribal Cultural Resources

The record search results indicate the study area is encompassed within the Sacramento River Tribal Cultural Landscape (TCL P-34-005225), identified by the Nisenan as Hoyo Sayo/Tah Sayo (UAIC) and the Plains Miwok as Waka-ce/Waka-Ly (Wilton Rancheria). However, the study area does not embody any of the contributing characteristics of the TCL, namely, waterways, tule habitat, fisheries, and other wildlife. As such, defining or contributing elements of the TCL would not be affected by project activities. No additional TCRs ~~archaeological resources~~ are recorded within the study area.

The term "prehistoric" is hereby revised throughout the entirety of the Draft EIR and replaced with the term "precontact." In particular, the text on page 4.3-19 of the Draft EIR is hereby revised as follows:

METHODOLOGY

~~For purposes of discussion throughout the following impacts and mitigation measures, the term "historic resources" describes extant buildings and structures as well as subsurface historic-era features (such as wells, privies, or foundations). Prehistoric resources refer to Native American sites, features, or burials.~~

~~While~~

For purposes of discussion throughout the following impacts and mitigation measures, the term "historic resources" includes extant architectural resources (e.g., buildings and structures), historic landscapes, and subsurface historic-era features (such as wells, privies, or foundations, as well as evidence of historic-era Native American occupation). "Precontact resources" refers to pre-European contact Native American sites, features, or burials.

Although there is a low likelihood that intact historic-era cultural deposits or features are present within the project site, the proximity of the project site to former high ground suggests a probability is moderate to high for the presence of intact ~~prehistoric~~ precontact deposits or features at depth within the project footprint. Background research indicates that substantial ~~prehistoric~~ precontact and historic deposits containing significant data have been discovered in similar settings in downtown Sacramento. Past projects have had success locating buried cultural resources using historic maps, photographs, archival data, and consultation.

The text on page 4.3-21 in "Mitigation Measure 4.3-1, Monitoring and Response Measures for Potential Unknown Historic Archaeological Resources," is hereby revised as follows:

Mitigation Measure 4.3-1: Monitoring and Response Measures for Potential Unknown Historic Archaeological Resources

A cultural resources awareness training program ~~will~~ shall be provided to all ~~construction~~ on-site personnel active on the project site during earthmoving activities. The first training ~~will~~ shall be provided prior to the initiation of ground-disturbing activities. The training ~~will~~ shall be developed and conducted in coordination with a qualified archaeologist meeting the U.S. Secretary of the Interior guidelines for professional archaeologists and consulting Native American tribes. The program shall include relevant information regarding sensitive cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program shall also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and shall outline what to do and whom to contact if any potential archaeological resources or artifacts are encountered.

Where ground-disturbing activities occur in native soils, or there is no evidence of extensive past ground disturbances, a qualified archaeologist meeting the U.S. Secretary of the Interior guidelines for professional archaeologists ~~will~~ shall monitor ground-disturbing activities. If evidence of any historic-era subsurface archaeological features or deposits ~~are~~ is discovered during construction-related earthmoving activities (e.g., ceramic shard, trash scatters, brick walls), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can ~~access~~ assess the significance of the find. If after evaluation, a resource is considered significant, all preservation options shall be considered as required by CEQA, including possible data recovery, mapping, capping, or avoidance of the resource. If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. However, if historic-era artifacts are found to be associated with Native American tribal members, they shall be evaluated and treated consistent with the process identified in Mitigation Measure 4.3-2. 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, and distributes this information to the public.

Significance after Mitigation

Implementation of this mitigation measure would reduce Impact 4.3-1 to a **less-than-significant** level by requiring preconstruction training, construction monitoring, and, in the case of a discovery, preservation options (including data recovery, mapping, capping, or avoidance) and proper curation if significant artifacts are recovered.

The text on page 4.3-22 in "Mitigation Measure 4.3-2, Monitoring and Response Measures for Potential Unknown Prehistoric Archaeological Resources and Tribal Cultural Resources," is hereby revised as follows:

Mitigation Measure 4.3-2: Monitoring and Response Measures for Potential Unknown ~~Prehistoric~~ Precontact Archaeological Resources and Tribal Cultural Resources

This mitigation measure expands on the actions included in Mitigation Measure 4.3-1 to also address encountering unknown ~~prehistoric~~ precontact archaeological and tribal cultural resources.

A representative or representatives from a culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the cultural resources awareness training program included in Mitigation Measure 4.3-1. The program will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and behaviors, consistent with Native American Tribal values.

Where ground disturbing activities occur in native soils, or there is no evidence of extensive past ground disturbances, or evidence suggests that imported soils have a high probability of containing artifacts and materials of importance to tribal entities, a qualified archaeologist and Native American tribal monitor(s) will monitor ground-disturbing activities. ~~Native American representative(s) will be invited to observe any excavations.~~ Interested Native American Tribes will be provided at least seven days' notice prior to the initiation of ground disturbing activities. If any previously undisturbed native soil is imported to the project site for fill or other purposes, the archaeologist and the ~~Native American representative(s)~~ tribal monitor(s) will also monitor handling and placement of this material to determine if archaeological material may be imported with the native soil. The determination for initiating or ending monitoring disturbance of imported soils will be made based on coordination between the qualified archeologist and ~~Native American~~ tribal monitor(s), with a final determination made by DGS.

If evidence of any ~~prehistoric~~ precontact subsurface archaeological features or deposits are discovered during construction-related earth-moving activities (e.g., lithic scatters, midden soils), all ground-disturbing activity in the vicinity of the discovery shall be halted until a qualified archaeologist and Native American representative can assess the significance of the find. If after evaluation, a resource is considered significant, or is considered a tribal cultural resource, all preservation options shall be considered as required by CEQA, including possible data recovery, mapping, capping, or avoidance of the resource. If artifacts must be recovered from significant ~~prehistoric~~ precontact archaeological resources, they shall be transferred to an appropriate tribal representative, or housed at a qualified curation facility. If artifacts or other materials must be removed, preference shall be given to transferring materials to an appropriate tribal representative and re-interring the material at a location on the project site. 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, and distributes this information to the public.

The text on page 4.3-25 in "Mitigation Measure 4.3-4b: Vibration Monitoring," is hereby revised as follows:

Mitigation Measure 4.3-4b: Vibration Monitoring

Although there is no anticipated substantial adverse change to the Stanford Mansion from vibration impacts from the project, Mitigation Measure 4.9-2 of this Draft EIR requires the development and implementation of a vibration control plan, which shall be applicable to construction activities located within 30 feet of any building or within 80 feet of an occupied building, such as the Leland Stanford Mansion.

A vibration control plan shall be developed by a vibration control consultant with documented expertise designing projects in sensitive historic settings ~~the design-build team~~ to be submitted to and approved by DGS before initiating any construction activities within the type and distance parameters identified above. Applicable elements of the plan will be implemented before, during, and after construction activity. The plan shall consider all potential vibration-inducing activities that would occur and require implementation of sufficient mitigation measures to ensure that the existing Leland Stanford Mansion State Historic Park, or other buildings, would not be exposed to vibration levels that would result in damage to the building.

The text on page 4.3-25 in "Mitigation Measure 4.3-4c: Repair Inadvertent Damage," is hereby revised as follows:

Mitigation Measure 4.3-4c: Repair Inadvertent Damage

If project-related demolition or construction activities results in inadvertent damage of historic elements of the Stanford Mansion, the State shall repair them in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Inadvertent damage is any damage that results in a significant impact to a historical resource within the meaning of CEQA Guidelines Section 15064.5(b)(2) or adverse effects to historic properties within the meaning of 36 C.F.R. Part 800.5(a)(1). All repairs shall be reviewed and approved by a qualified architectural historian ~~or historic architect~~ under the supervision of a qualified preservation architect (both meeting the appropriate Secretary of Interior's Professional Qualification Standards) prior to determining that the treatment has been adequately implemented.

The text on page 4.3-26 in "Mitigation Measure 4.3-4d: Preparation of Archival Recordation Documentation," is hereby revised as follows:

Mitigation Measure 4.3-4d: Preparation of Archival Recordation Documentation

DGS shall ensure that prior to any building alteration or demolition activities, the Resources Building shall be the subject of recordation by photography and written historical data following the standards of the Historic American Buildings Survey (HABS). HABS Level II documentation shall be implemented, which includes large-format archival photographs and written data and shall include historic plans of the building and associated landscape features. Archival photographs to sufficiently document the property shall include ~~up to~~ approximately 30 views of the Resources Building including contextual views of the building within its setting, along with exterior, interior, and detail views of character-defining features. The HABS documentation shall be completed by a qualified professional who meets the standards for History or Architectural History set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The draft documentation shall be submitted for review and approval by DGS. The final documentation shall be distributed or offered to the SHPO, DGS, and the appropriate interested parties, which may include, but is not limited to historical organizations.

The text on page 4.3-26 in "Mitigation Measure 4.3-4e: Interpretive Panels and/or Signage," is hereby revised as follows:

Mitigation Measure 4.3-4e: Interpretive Panels and/or Signage

DGS shall prepare two or more interpretive exhibits, signs, and or plaques that provide information regarding the history, construction, and subsequent use of the Resources Building and the California State Capitol Plan, and shall include information regarding the Modernism and International architectural styles. The interpretive exhibits would use images, narrative history, drawings, or other material produced for the archival recordation documentation mitigation (Mitigation 4.3-4d), oral histories (Mitigation Measure 4.3-4f), documentation collected from the time capsule embedded in the cornerstone of the building, or other archival resources. DGS will reuse existing building materials, as feasible, in the exhibits to create a tangible link between the existing building and the renovated building. The interpretive exhibits may be in the form of, but are not necessarily limited to, interpretive display panels, and/or printed material for dissemination to the public. The interpretive exhibits shall be installed within interior public spaces of the renovated Resources Building and ~~should~~ shall integrated into the design of the outdoor public areas. Interpretive displays and the signage/plaques installed outdoors ~~should~~ shall be sufficiently durable to withstand inclement weather conditions of the site for at least ten years, like fiber-glass embedment panels, that meet National Park Service signage standards. Displays and signage/plaques shall be lighted, installed at pedestrian-friendly locations, and be of adequate size to attract the interested pedestrian. Maintenance of displays and signage/plaques shall be included in the management of the common area maintenance program on the property.

The text page 4.3-26 in "Mitigation Measure 4.3-4f: Oral History Project," is hereby revised as follows:

Mitigation Measure 4.3-4f: Oral History Project

Prior to any structural demolition and construction activities, one or more persons meeting the Secretary of the Interior's Professional Qualification Standards under History and Architectural History shall assemble important personal histories of persons knowledgeable about history and Modernism and International design of the Resources Building, and the design, adoption, and implementation of the California State Capitol Plan. An oral history project to record their stories would be a valuable resource and assist with interpretative and educational exhibits, (Mitigation 4.3-4e, and archival recordation documentation (Mitigation 4.3-4d). The Center for Sacramento History, and other local museum and historical societies, shall be given the opportunity to comment on the research design for any oral history project. The research design would identify anticipated informants, research goals, and protocols. Any oral history research and interviews ~~should~~ shall be conducted in conformance with the Principles for Oral History and Best Practices for Oral History (October 2009). CDs

prepared during any oral history project ~~should~~ shall be recorded on archive quality discs, such as archival gold CD-Rs, and disseminated to local repositories. The oral history project shall be available at the Resources Building when occupancy begins.

3.2.3 Revisions to Section 4.9, Noise and Vibration

The text on pages 4.9-14 and 4.9-15 in "Mitigation Measure 4.9-2: Develop and Implement a Vibration Control Plan," is hereby revised as follows:

Mitigation Measure 4.9-2: Develop and Implement a Vibration Control Plan

This mitigation measure shall be applicable to construction activities located within 30 feet of any building or within 80 feet of an occupied building, such as the Leland Stanford Mansion or a nearby office building.

A vibration control plan shall be developed by a vibration control consultant with documented expertise designing projects in sensitive historic settings ~~the design-build team~~ to be submitted to and approved by DGS before initiating any construction activities within the type and distance parameters identified above. Applicable elements of the plan will be implemented before, during, and after construction activity. The plan shall consider all potential vibration-inducing activities that would occur and require implementation of sufficient mitigation measures to ensure that the existing Leland Stanford Mansion State Historic Park, or other buildings, would not be exposed to vibration levels that would result in damage to the building or substantial human disturbance. Items that shall be addressed in the plan include, but are not limited to, the following:

…

4 REFERENCES

CHAPTER 1, INTRODUCTION

California Department of General Services. 2001. *Resources Building Renovation Study*.

———. 2014 (July). *Resources Building Renovation Study Update*.

DGS. *See* California Department of General Services.

CHAPTER 2, RESPONSES TO COMMENTS

U.S. Department of the Interior National Park Service. Technical Preservation Services. 2017. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings*. Page 2. Washington D.C.

CHAPTER 3, REVISIONS TO THE DRAFT EIR

No references cited.

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