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| <b>Docket Number:</b>   | 93-AFC-02C  |
| <b>Project Title:</b>   | Compliance - Application for Certification SMUD's Proctor & Gamble Cogeneration Project |
| <b>TN #:</b>            | 203477  |
| <b>Document Title:</b>  | SCA Procter & Gamble - Data Requests 1-12   |
| <b>Description:</b>     | SCA Procter & Gamble - Data Requests 1-12 (12-23-2014)                                  |
| <b>Filer:</b>           | Mary Dyas   |
| <b>Organization:</b>    | California Energy Commission  |
| <b>Submitter Role:</b>  | Commission Staff  |
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**CALIFORNIA ENERGY COMMISSION**

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SACRAMENTO, CA 95814-5512  
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December 23, 2014

Ross Gould  
Superintendent / Thermal Generation & Gas Pipeline Assets  
SMUD Power Generation  
6201 S Street  
Mail Stop B355  
Sacramento, CA 95628

Dear Mr. Gould,

**SCA PROCTER & GAMBLE PROJECT (93-AFC-2C) - PETITION TO AMEND**

Pursuant to Title 20, California Code of Regulations, section 1769, the California Energy Commission staff, requests the information specified in the enclosed data requests. The information requested is necessary for Commission staff to more fully understand the project and assess whether the project will result in adverse impacts.

This set of Data Requests (#1-12) is being made in the area of Cultural Resources. The Data Requests were developed as a result of staff's review of the Petition to Amend submitted by the Sacramento Cogeneration Authority (SCA) on October 30, 2014. Written responses to the enclosed data requests are due to the Energy Commission staff on or before January 23, 2014 or at such a date as may be mutually agreed.

If you are unable to provide the information requested, or object to providing the requested information, please notify me within 14, days of receipt of this request. Any objections to the data requests must contain the reasons for not providing the information, and the grounds for any objections (see Title 20, California Code of Regulations, section 1769).

If you have any questions, please call me at (916) 651-8891, or E-mail me at [mary.dyas@energy.ca.gov](mailto:mary.dyas@energy.ca.gov).

Sincerely,

Mary Dyas  
Compliance Project Manager

Enclosure:  
Data Requests

**SACRAMENTO COGENERATION AUTHORITY  
PROCTER AND GAMBLE (93-AFC-2C)  
Data Requests**

**Technical Area: Cultural Resources**

**Authors: Melissa Mourkas and Gabriel Roark**

**Background: Transportation Route**

The proposed route(s) described in the petition to amend (PTA) to transport Boiler 1B from the Sacramento Co-Gen facility at Campbell Soup Supply Company (CSSC) to the Co-Gen facility at Proctor & Gamble (P&G) might encounter overhead or other obstructions (SCA 2014:3-15). The PTA goes on to describe the Central Route as the preferred route, noting that it has the fewest overhead obstructions and the ability to cross over to the opposite side of the street to maneuver around overhead traffic lights. However, the description provided is not firm on whether or not obstructions would be encountered and whether removal or adjustment of traffic and transportation facilities might be required. Removal or adjustment of infrastructure such as poles, curbs, transmission lines, or other facilities has the potential to create ground disturbance and subsequently, the potential to impact historical resources.

**Data Requests:**

1. Please describe modifications to any roadway or intersection that may be required for transportation of Boiler 1B.
2. If modifications are required, please describe the potential for ground disturbance, the degree of disturbance and/or the potential impacts on any resources of historic age<sup>1</sup> along the route(s).

**Background: Removal of Boiler 1B**

At staff's request, the petitioner (SCA/SMUD) provided a figure (SCA 2014b, attached) showing the location of the building housing Boiler 1B and a photograph of the boiler itself to assist staff in understanding exactly where Boiler 1B is currently located. According to the supplemental information provided by the petitioner on November 24, 2014, Boiler 1B is currently located at the CSSC plant at 6200 Franklin Boulevard in Sacramento County, in a facility designated as the Old Boiler House. Additionally, the petitioner provided information on December 9, 2014, revealing that the boiler house is part of the original CSSC factory whose construction began in 1947 (SCA 2014c). This indicates that the CSSC and facilities such as the boiler house are of historic age. The petitioner also provided a chronology of upgrades to the boiler(s) at the CSSC. The chronology indicates that Boiler 1B was one of several boiler replacements which took place on the CSSC plant site beginning in 1986, continuing into 1990. The CSSC

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<sup>1</sup> Defined as resources that are 45 years or older (OHP 1995:2).

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CoGen plant was licensed in 1994 to provide additional steam capacity to the CSSC and is located adjacent to the CSSC plant.

What is not understood from the information provided to date are the potential impacts to the 1947 CSSC plant, how the removal of Boiler 1B would occur, and what type of modifications to the boiler house, excavation or ground disturbance might be required to accomplish this task. The petitioner can fill these information gaps for staff by providing the information requested below.

**Data Requests:**

3. Is any ground disturbance anticipated for the Boiler 1B removal at the CSSC plant? If so, please describe in detail the extent of ground disturbance anticipated.
4. What was the depth of previous excavation at the location of Boiler 1B?
5. What modifications, if any, to the “boiler house” structure will be required to remove Boiler 1B?
6. If there will be ground disturbance and/or modifications to the boiler house, please conduct a cultural resources inventory of the proposed activities at the CSSC plant to the standards described in Title 20, California Code of Regulations, section 1704(b)(2), Appendix B(g)(2)(B)–(C). If all proposed removal activities would occur on paved or graveled surfaces, and do not require excavation, the petitioner need not conduct an archaeological survey as part of the cultural resources inventory. If modification would be made to the boiler house, please evaluate the Old Boiler House under the California Environmental Quality Act’s criteria for historical resources as part of the cultural resources inventory referred to previously in this paragraph.

**Background: Construction at P&G**

Boiler 1B is proposed to be installed on the grounds of the P&G plant at 5000 83<sup>rd</sup> Street, within the city of Sacramento. Section 2.0 of the PTA provides general information but details have not been provided as to the method of installation or the potential for ground disturbing activities.

**Data Requests:**

7. What is the depth of excavation required to build the Boiler 1B foundation at the project site?

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8. Please describe the nature of the utility tie-in and display the location on a 7.5-minute topographic map of the project site. How deep would excavation need to be? How deep was previous excavation at this location?
9. What “associated facilities<sup>2</sup>” would need to be constructed and installed? Please map their locations on a 7.5-minute topographic quadrangle and describe them, with reference to prior depth of excavation and proposed excavation for new associated facilities.
10. Please describe and map on a 7.5-minute topographic quadrangle and aerial photograph the proposed tie-in to the substation. Include depths of proposed and previous excavations, if applicable.

**Background: Records Search Results**

11. Certain studies and information are missing from the records search documented in Helton (2014:Confidential Attachment A). These are primarily architectural surveys and evaluations within a one-mile radius of the proposed project amendment. In addition, certain maps or plats were not included.
  - a. SA-7130 (Hatoff and Egheman 2002) records several cultural resources. If this report covers a historic architectural survey or archaeological excavations, staff will require a copy of this report.
  - b. SA-3405 (Maniery 1995) is an architectural survey; staff requires a copy.
  - c. SA-310B (Bakarich and Rondeau 1980) is an architectural survey; staff requires a copy.
  - d. SA-3397 (USACE 1998) is an architectural survey and evaluation; staff requires a copy.
  - e. SA-3373 (Green 1998) is an architectural survey and evaluation; staff requires a copy.
  - f. Examination of prior records search materials shows record of survey SA-379 along Florin-Perkins Road, within the 1-mile buffer (Cleland et al. 1987). This document includes management provisions for historic architecture, and therefore should be provided to staff.

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<sup>2</sup> Referenced numerous times in the PTA (Helton 2014:iii, 1-1-1-2; SCA 2014:ES-1, 1-1-1-4, 2-1-2-2, 3-3, 3-7-3-17; Trew and Herbert 2014:1).

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**REFERENCES**

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**Bakarich and Rondeau 1980**—Lili Bakarich and Michael F. Rondeau. *Additional Historic Archival Research and Reconnaissance for the Proposed Widening of Florin-Perkins Road (Addendum Report)*. On file, North Central Information Center, California Historical Resources Information System, Sacramento. Study 000310B.

**CBSLocal 2012**—CBS Sacramento.  
<http://sacramento.cbslocal.com/2012/09/27/campbell-soup-is-shutting-down-sacramento-plant>. September, 2012.

**CEC 1994a**—California Energy Commission. *Final Staff Assessment, Sacramento Power Authority Application for Certification for the SMUD Co-Gen Project at Proctor & Gamble. 93-AFC-2*. July. On file, California Energy Commission Library, Sacramento.

**CEC 1994b**—California Energy Commission. *Final Staff Assessment, Sacramento Power Authority Application for Certification for the SMUD Co-Gen Project at Campbell Soup. 93-AFC-3C*. July. On file, California Energy Commission Library, Sacramento.

**CEC 1994c**—California Energy Commission. *Final Decision, Sacramento Power Authority Application for Certification for the SMUD Co-Gen Project at Proctor & Gamble. 93-AFC-2*. November. On file, California Energy Commission Library, Sacramento.

**Cleland et al. 1987**—James H. Cleland, A. L. Christenson, C. M. Woods, and J. C. Smith. *An Archeological Overview and Management Plan for the Sacramento Army Depot, Sacramento, California*. Prepared for Western Region, National Park Service, U.S. Department of the Interior, San Francisco. On file, North Central Information Center, California Historical Resources Information System, Sacramento. Study SA-000379.

**Green 1998**—Melvyn Green. *Historic Properties Sacramento Army Depot and Benicia Army Cemetery*. On file, North Central Information Center, California Historical Resources Information System, Sacramento. Study SA-003373.

**Hatoff and Egheman 2002**—Brian Hatoff and R. Egheman. *Roseville Energy Facility Cultural Resources*. June. URS. On file, North Central Information Center, California Historical Resources Information System, Sacramento. Study SA-007130.

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**Helton 2014—Clint Helton.** *Cultural Resources Report for the Sacramento Cogeneration Authority's Petition for Post-certification License Amendment of the Procter and Gamble Cogeneration Project (93-AFC-2C)*. October. CH2M Hill, Santa Ana, CA. Prepared for Sacramento Cogeneration Authority. Appendix B to *Petition for Post-certification License Amendment: Addition of an Auxiliary Boiler and Associated Facilities for the Sacramento Cogeneration Authority's Procter and Gamble Cogeneration Project, Sacramento, California (93-AFC-2C)*, by Sacramento Cogeneration Authority. October 2014. Sacramento, CA. Submitted to California Energy Commission, Sacramento.

**Maniery 1995—Mary L. Maniery.** *Historical Property Survey of the Sacramento Army Depot Redevelopment Plan EIR*. PAR Environmental, Sacramento, CA. On file, North Central Information Center, California Historical Resources Information System, Sacramento. Study SA-003405.

**OHP 1995—Office of Historic Preservation.** *Instructions for Recording Historical Resources*. March. Sacramento, CA. Electronic document, <http://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>, accessed December 1, 2014.

**OHP 2012—Office of Historic Preservation.** Directory of Properties in the Historic Property Data File for Sacramento County. April 5. Sacramento, CA. On file, North Central Information Center, California Historical Resources Information System, Sacramento. In Confidential Cultural Resources Attachment A to *Cultural Resources Report for the Sacramento Cogeneration Authority's Petition for Post-certification License Amendment of the Procter and Gamble Cogeneration Project (93-AFC-2C)*, by Clint Helton. October. CH2M Hill, Santa Ana, CA. Prepared for Sacramento Cogeneration Authority. Appendix B to *Petition for Post-certification License Amendment: Addition of an Auxiliary Boiler and Associated Facilities for the Sacramento Cogeneration Authority's Procter and Gamble Cogeneration Project, Sacramento, California (93-AFC-2C)*, by Sacramento Cogeneration Authority. October 2014. Sacramento, CA. Submitted to California Energy Commission, Sacramento.

**SCA 1993a—Sacramento Cogeneration Authority.** (Sacramento Power Authority). Application for Certification Procter & Gamble Cogeneration Project. 93-AFC-2. September.

**SCA 1993b—Sacramento Cogeneration Authority.** (Sacramento Power Authority). Application for Certification Campbell Soup Cogeneration Project. 93-AFC-3C. November.

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**SCA 2014a—Sacramento Cogeneration Authority.** *Petition for Post-certification License Amendment: Addition of an Auxiliary Boiler and Associated Facilities for the Sacramento Cogeneration Authority's Procter and Gamble Cogeneration Project, Sacramento, California (93-AFC-2C).* October. Sacramento, CA. Submitted to California Energy Commission, Sacramento.

**SCA 2014b—Sacramento Cogeneration Authority.** Current Location of Auxilliary Boiler 1B (formerly Campbell Soup Boiler #2) and Accompanying Photograph. Submitted to Energy Commission staff via e-mail December 2, 2014). November 24, 2014.

**SCA 2014c—Sacramento Cogeneration Authority/SMUD.** E-mail correspondence from Ross Gould to Energy Commission Staff. December 9, 2014.

**Trew and Herbert 2014—Leslie Trew and Rand Herbert.** *Sacramento Cogeneration Authority's Petition for Post-certification License Amendment of the Procter and Gamble Cogeneration Project Historic Resources Inventory and Evaluation Report.* October. Davis, CA. Prepared for Sacramento Cogeneration Authority. Appendix C to *Petition for Post-certification License Amendment: Addition of an Auxiliary Boiler and Associated Facilities for the Sacramento Cogeneration Authority's Procter and Gamble Cogeneration Project, Sacramento, California (93-AFC-2C)*, by Sacramento Cogeneration Authority. October 2014. Sacramento, CA. Submitted to California Energy Commission, Sacramento.

**USACE 1998—U.S. Army Corps of Engineers.** *Evaluation of Cultural Resources at Sacramento Army Depot.* On file, North Central Information Center, California Historical Resources Information System, Sacramento. Study 003397.