

# Appendix D

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## Cultural Resources Memorandum



**Cultural Resources Overview Report**  
**SRR Project – Turlock Irrigation District**  
**Marshall Substation Site**

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**Peer-Reviewer:**                      **Date:** 1/4/2023

**Jurisdiction:** California Department of Water Resources

**Regulatory Nexus:**     CEQA         NEPA/ NHPA Section 106

**Project Location:** The proposed project (project) is located south of the community of Patterson, in unincorporated Stanislaus County. The proposed project site is located on a parcel containing the existing Marshall substation, operated by the Turlock Irrigation District (TID), with the project directly adjacent to the existing substation in the southwestern portion of the parcel. The proposed installation area is currently a vacant, fenced-in area used for storage and staging. The project is depicted in Sections 6 of Township 6 South, Range 8 West, on the *Crows Landing, California* 7.5-minute USGS topographic quadrangle maps (Figure 1).

**Project Description:** California Assembly Bill (AB) 205 and AB 209 created a state-led Strategic Reliability Reserve (SRR) program to be developed by the California Department of Water Resources (DWR) in conjunction with its sister state agencies, the California Energy Commission (CEC) and California Air Resources Board (CARB). As part of the SRR program, DWR is looking to develop new emergency and temporary generators, new energy storage systems, and clean energy generation projects, and generate funding for an extension of existing energy generation operations. This effort is just one part of California’s broader effort to safeguard the state’s energy system in the face of climate-induced drought, wildfires, and heat waves that are impacting the state’s energy grid. The equipment installed as part of the SRR program would be used only in extreme peak-demand events to provide temporary power generation to stabilize and supplement existing grid-tied power supplies to avoid grid failures.

The proposed project would include installation of 120 natural gas generators, arranged in 24 rows with five generators each. Associated infrastructure proposed for installation adjacent to the generators would include 24 transformers, 24 generator step-up transformers (GSUs), and four electric switchgear boxes. Each generator would be housed in an enclosure with maximum dimensions of 120 inches by 96 inches by 142 inches (length by width by height). The overall footprint of the proposed generator facility measures approximately 200 feet by 300 feet (Figure 2).

Construction of the proposed project would include site preparation and grading of approximately 70,000 square feet of land for installation of the generators. There would be approximately 900 feet of trenching for fuel pipelines on the project site. Proposed trenches would range from 3 feet wide by 3 feet deep, to 6 feet wide by 6 feet deep. No demolition would be required and no import of soil is anticipated. The area proposed for

installation of the generators would be surfaced with several inches of compacted crushed concrete base rock. Overall depth of disturbance is not expected to exceed 10-feet below existing surface accounting for grading, trenching, and potential over-excavation.

## Background Research

### Data sources:

- Internal DWR Cultural Database
- California Historical Resources Information System Record Search (CHRIS):
  - New     Previous

On November 4, 2022, a CHRIS records search was completed on behalf of Dudek by the Central California Information Center (CCalC). The records search request included the project footprint with a 1-mile radius buffer. The CHRIS search included previously recorded cultural resources and cultural resource studies, as well as review of the National Register of Historic Places, California Register of Historical Resources, California Points of Historical Interest list, California Historical Landmarks list, Archaeological Determinations of Eligibility list, and California State Historic Resources Inventory list (Confidential Attachment A).

- Native American Heritage Commission (NAHC) Sacred Lands Search and Native American Contact List Request Sacred Lands Search Results:
  - Negative     Positive

On October 27, 2022, Dudek requested an NAHC Sacred Lands File Search and Native American Contact List. Additionally, tribal engagement letters requesting consultation for this project as well as the SRR Energy Project Lodi and Modesto Sites were sent to the tribes (see Attachment B).

- Aerial Imagery: 1957, 1971, 1982, 1998, 2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020 (NETR 2022)
- Historic USGS Maps: 1916, 1919, 1920, 1941, 1943, 1947, 1955, 1965, 1972, 1985, 2012, 2015, 2018 (NETR 2022)
- GLO Maps:
- Previous publications and reports
- Other:

Previous survey coverage:         No     Yes

Fifteen previous cultural resource investigations have been undertaken within a 1-mile radius of the project footprint. Of those studies, four address areas intersecting the project footprint: ST-05060, ST-06133, ST-06384, and ST-08341. A small portion of the project footprint has been previously surveyed, primarily along Marshall Road and in the southwest corner of the existing Marshall Substation. While ST-05060 addresses a large portion of the project footprint, the study did not intensively survey that portion of the

report's study area due to access constraints. As such, relatively little of the proposed project site has been subject to previous intensive survey.

Previously recorded resources in project footprint: According to the CCalC record search results, no previously recorded cultural resources are located within the project footprint and two resources are recorded within a 1-mile radius. Both recorded resources are historic-era built environment resources: the Delta Medota Canal (P-50-001904) and Crows Landing Naval Auxiliary Air Station (P-50-002043).

Potential resources in project footprint:

Review of historic aerials and topographic maps was conducted to assess the history of development and disturbance within the project footprint, as a means of assessing the potential presence of unrecorded cultural resources. Topographic maps and aerial images show the project footprint as undeveloped agricultural lands until the 2005 aerial image, at which time the TID Marshall Substation facility is first evident. Most of the area immediately surrounding the project has always consisted of undeveloped or agricultural lands with the exception of West Marshall Road, the Delta Medota Canal, and a residential or agricultural property with several structures located approximately 200 meters west of the project footprint, on the opposite side of the canal.

West Marshall Road is evident on the earliest available topographic map, from 1916, and appears essential unchanged across all aerials and maps. The Delta Mendota Canal first appears on the 1955 topographic map with a newly constructed access road paralleling its eastern side. The canal and road appear unchanged on all subsequent maps and aerial images. A structure is depicted in the location of the aforementioned property on the 1916 map and all subsequent maps until the 2012 topographic, which no longer depicts buildings. The 1941, 1955, 1965, 1972, and 1985 topographic maps depict two buildings on the property, while the other maps depict only one. The two structures, a residence and larger agricultural building, are visible on the 1957 aerial image, and the developed area around the property expands northward to cover a larger area on the 1982 and subsequent aerials. Finally, the project footprint itself appears to be agricultural or undeveloped fields on aerial images prior to 1998, at which point the area appears to be covered by row crops (possible orchards). The TID Marshall Substation first appears on the 2005 aerial image and shows no notable changes on the remaining aerials.

As such, the project footprint appears to be entirely disturbed, with no potentially historic properties within its boundaries. Depending on the depth of disturbance which occurred during construction of the TID Marshall substation, undisturbed subsurface soils may be present in the area. However, given the lack of natural resources or topographic features in the immediate vicinity, the area appears to have low archaeological sensitivity.

## **Field Visit**

Survey:  No  Yes

An intensive pedestrian survey of the entire project footprint was conducted on November 11, 2022, by Dudek Archaeologist Walter Tovar-Saldana. The survey involved walking in closely-spaced transects (less than 5 meters apart) and scanning the ground for cultural resources. Surface visibility was variable. Visibility in the undeveloped northeastern portion of the project footprint was excellent (approximately 100%, with a small amount

of vegetation), but visibility was very low (approximately 0-10%) within the developed substation and moderate-to-low (approximately 25-50%) in the proposed generator installation area, with the surface obscured by imported gravels. Exposed soils consisted of brown, sandy-clay loam. Photographs were taken to document the existing conditions within the project footprint (Figure 3).

Newly recorded resources: The intensive-level pedestrian survey of the project did not identify any surficial evidence of previously unidentified archaeological resources.

## **Results and Recommendations**

The results of the cultural resource inventory efforts are based on CCalC records search results, a review of historic topographic maps and aerial photos, and an intensive pedestrian survey. One cultural resource was identified as a result of these efforts.

Four previous cultural resource investigations intersect the project footprint, however the area has only been subject to limited previous archaeological survey and no resources are recorded within the project footprint.

Record search results did indicate that there is one listed linear resource adjacent to the proposed project footprint, the Delta-Mendota Canal (P-50-001904). The Delta-Mendota Canal has been determined eligible in the NHPA Section 106 consultation process under NRHP/CRHR Criteria A/1, for its major role in water conveyance between Sacramento River Valley And San Joaquin River Valley as part of the Central Valley Project. Though the Delta-Mendota Canal is adjacent to the proposed project site, no physical changes to this resource or to the character-defining features which support its eligibility/listing would be affected by the project. Moreover, the Delta-Mendota Canal spans multiple miles in length and as such, the introduction of a new building or structure at one point along its total length will not affect the ability of the resource to convey overall significance.

Intensive pedestrian survey of the entire project footprint for the current study did not identify any additional cultural resources. Nearly the entirety of the project footprint is previously disturbed by construction of the TID Marshall Substation. Even if project ground disturbing activities extend into native, undisturbed soils the area has low archaeological sensitivity and the potential for impacts to cultural resources is low.

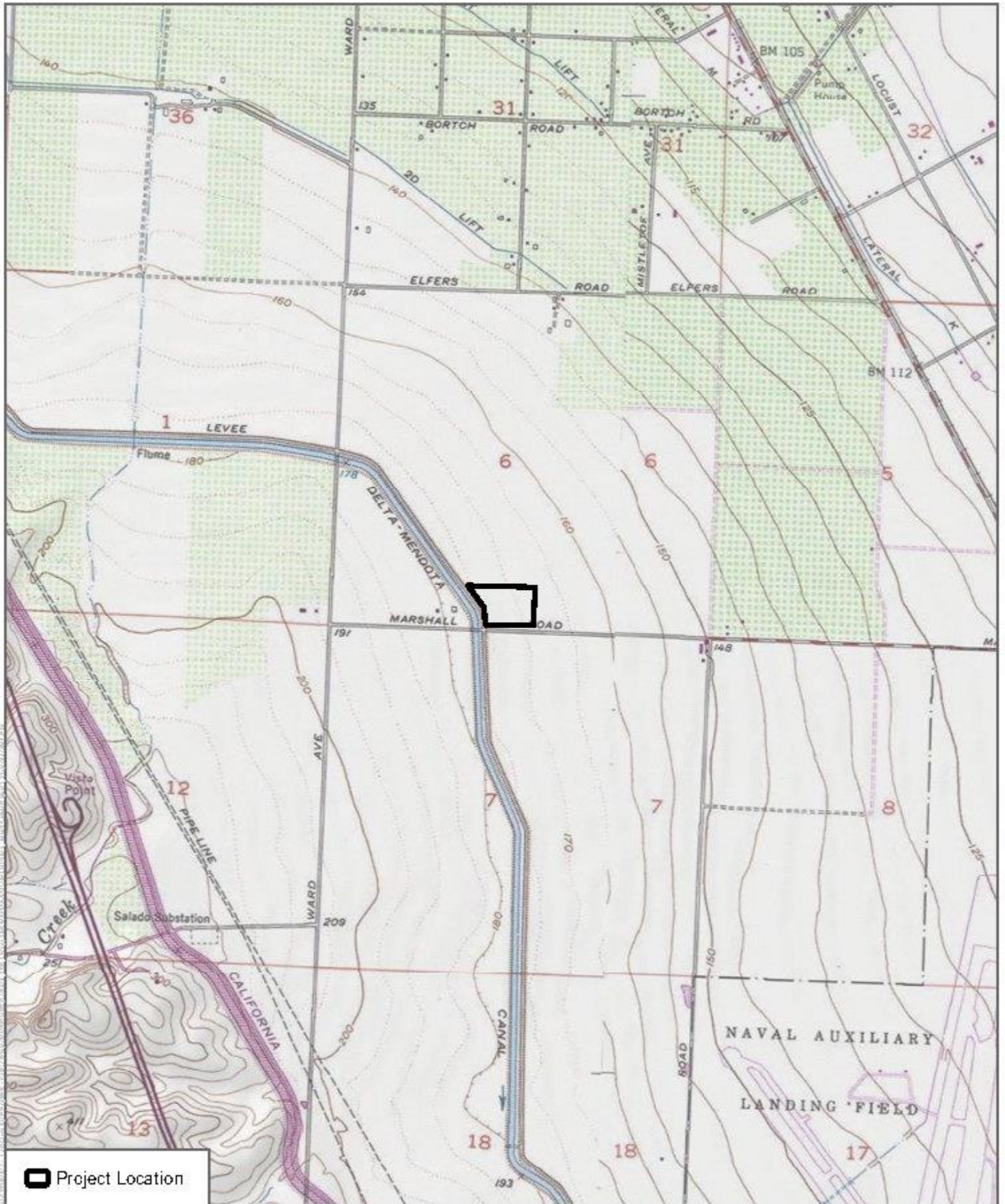
The project activities described within the footprint covered by this memo may be considered cleared for cultural resources under CEQA. Should any of the above project plans be modified to include work not reviewed in this memo, additional studies will be required.

If other cultural resources are discovered while engaging in project activities, all work will temporarily cease until the findings can be assessed by a qualified archaeologist and an appropriate course of action can be determined. Should human remains be uncovered, all work must stop immediately and the County coroner must be contacted pursuant to California Health and Human Safety Code 7050.5(b).

## **References Cited**

NETR. 2022. Historic Aerial Photographs and Topographic maps of Project Site, dating from 1916-2020. Accessed December 8, 2022. <https://www.historicaerials.com/viewer>.





SOURCE: USGS 7.5-minute Series Patterson & Crows Landing Quadrangles

FIGURE 1

Project Location











**Figure 3. Overview of Proposed Generator Installation Area. View to the northeast.**

# **Attachment A**

Confidential Records Search Results



# **Attachment B**

Native American Heritage Commission Tribal Consultation List



**Native American Heritage Commission  
Tribal Consultation List  
Stanislaus County  
12/9/2022**

**Calaveras Band of Mi-Wuk  
Indians**

Gloria Grimes, Chairperson  
P.O. Box 899  
West Point, CA, 95255  
Phone: (209) 419 - 5675  
calaverasband.miwukindians@gmail.com

Mi-wuk

**North Valley Yokuts Tribe**

Katherine Perez, Chairperson  
P.O. Box 717  
Linden, CA, 95236  
Phone: (209) 887 - 3415  
canutes@verizon.net

Costanoan  
Northern Valley  
Yokut

**North Valley Yokuts Tribe**

Timothy Perez,  
P.O. Box 717  
Linden, CA, 95236  
Phone: (209) 662 - 2788  
huskanam@gmail.com

Costanoan  
Northern Valley  
Yokut

**Southern Sierra Miwuk Nation**

Sandra Chapman, Chairperson  
P.O. Box 186  
Mariposa, CA, 95338  
Phone: (559) 580 - 7871  
sandra47roy@gmail.com

Miwok  
Northern Valley  
Yokut  
Paiute

**Tule River Indian Tribe**

Neil Peyron, Chairperson  
P.O. Box 589  
Porterville, CA, 93258  
Phone: (559) 781 - 4271  
Fax: (559) 781-4610  
neil.peyron@tulerivertribe-nsn.gov

Yokut

**Wuksache Indian Tribe/Eshom  
Valley Band**

Kenneth Woodrow, Chairperson  
1179 Rock Haven Ct.  
Salinas, CA, 93906  
Phone: (831) 443 - 9702  
kwood8934@aol.com

Foothill Yokut  
Mono

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed DWR SRR Energy – Modesto Site Project, Stanislaus County.



<u>Tribe</u>	<u>Contact(s)</u>	<u>Title</u>	<u>Letter Sent Date</u>	<u>Response</u>	<u>Follow-up</u>
Calaveras Band of Mi-Wuk Indians	Gloria Grimes	Chairperson	12/16/2022	Pending	email sent 12/20/2022
North Valley Yokuts Tribe	Katherine Perez	Chairperson	12/16/2022	Pending	email sent 12/20/2022
	Timothy Perez	None provided	12/16/2022	Pending	email sent 12/20/2022
Southern Sierra Miwuk Nation	Sandra Chapman	Chairperson	12/16/2022	Pending	email sent 12/20/2022
Tule River Indian Tribe	Neil Peyron	Chairperson	12/16/2022	Pending	email sent 12/20/2022
Wuksache Indian Tribe/Eshom Valley Band	Kenneth Woodrow	Chairperson	12/16/2022	Pending	email sent 12/20/2022