Office of Planning and Environmental Review
Leighann Moffitt, Director

County Executive
Navdeep S. Gill

Mitigated Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Negative Declaration re: The Project described as follows:

1. **Control Number: PLNP2020-00054**

2. **Title and Short Description of Project:** Mutual Housing & Habitat for Humanity at 46th Street
   A **Tentative Subdivision Map** to divide an approximately 7.1-gross-acre, split-zoned parcel into:
   18 lots for single-family residential uses on approximately 3.6 gross acres in the RD-5 zone.
   2 lots for 108 affordable apartment units on approximately 3.5 gross acres in RD-20 zoning district.
   A **Special Development Permit** to allow the following:
   Deviation from the minimum setback required from residentially-zoned or property used for residential purposes
   Deviation from the required landscape screening north of the trash enclosure.
   A **Design Review** to deviate from minimum covered parking spaces requirements and to comply with the Countywide Design Guidelines.
   A **State Density Bonus** to allow for 108 affordable units and for the following incentives:
   Deviation from minimum building setbacks (front, rear, and side street).
   Deviation from the required minimum parking spaces.

3. **Assessor's Parcel Number:** 039-0011-013-0000

4. **Location of Project:** The property is located at the southern terminus of Lang Avenue and 46th Street, approximately 0.3 miles south of 47th Avenue, in the South Sacramento community of unincorporated Sacramento County.

5. **Project Applicant:** Mutual Housing California Sacramento

6. Said project will not have a significant effect on the environment for the following reasons:
   a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
   b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
   c. It will not have impacts, which are individually limited, but cumulatively considerable.
   d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

8. The attached Initial Study has been prepared by the Sacramento County Office of Planning and Environmental Review in support of this Negative Declaration. Further information may be obtained by contacting the Office of Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

[Original Signature on File]
Todd Smith
Interim Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
OFFICE OF PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2020-00054

NAME: Mutual Housing & Habitat for Humanity at 46th Street

LOCATION: The property is located at the southern terminus of Lang Avenue and 46th Street, approximately 0.3 miles south of 47th Avenue, in the South Sacramento community of unincorporated Sacramento County.

ASSESSOR'S PARCEL NUMBER: 039-0011-013-0000

OWNERS:

Celia Yniguez
Sacramento Housing and
Redevelopment Agency
801 12th Street
Sacramento, CA 95814

Leah Miller
Habitat for Humanity Greater
Sacramento
819 N 10th Street
Sacramento, CA 95811

APPLICANT:

Parker Evans
Mutual Housing California Sacramento
3321 Power Inn Road, Suite 320
Sacramento, CA 95826

PROJECT DESCRIPTION

1. A **Tentative Subdivision Map** to divide an approximately 7.1-gross-acre, split-zoned parcel into:
    a. 18 lots for single-family residential uses on approximately 3.6 gross acres in the RD-5 zone.
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   a. Deviation from the minimum setback required from residentially-zoned or property used for residential purposes
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3. A **Design Review** to deviate from minimum covered parking spaces requirements and to comply with the Countywide Design Guidelines.

4. A **State Density Bonus** to allow for 108 affordable units and for the following incentives:
   a. Deviation from minimum building setbacks (front, rear, and side street).
   b. Deviation from the required minimum parking spaces.

ENVIRONMENTAL SETTING

The project site is not developed and is actively managed for vegetation abatement for fire control purposes. Habitats are ruderal and disturbed, and are dominated by a variety of non-native weeds with a low diversity of native forbs. Adjacent land uses include a mixture of residential properties of single-family homes and apartment complexes, Nicholas County Park, and State Route 99. The primary land use within the immediate region consists of residential and commercial development. Topography of the project site is relatively level with elevations ranging from 23 to 27 feet above mean sea level.

Plate IS-1: Vicinity Map

Plate IS-2: Proposed Site Plan

ENVIRONMENTAL EFFECTS

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed an Initial Study Checklist (located at the end of this report). The Checklist identifies a range of potential significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

POPULATION/HOUSING

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure).

DISCUSSION OF PROJECT IMPACTS

While the project would directly induce growth with the addition of 18 single-family residential homes and 108 multi-family units (upon full buildout), the project is surrounded by existing residential development and would be consistent with surrounding land use and density. The project is located within the county Urban Services Boundary in an urban area with existing public services and available capacity. Although the project would require a minor extension of existing infrastructure (water & sewer), it is located immediately adjacent to existing residential neighborhoods with these services.

CONCLUSION

Although the project would directly induce growth with the addition of 18 single-family residential homes and 108 multi-family units and require the extension of public infrastructure, it would not result in substantial, unplanned population growth, as the project is located in an area largely developed by residential development with available public services. Impacts are considered ***less than significant***.

TRANSPORTATION/TRAFFIC

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County

VMT Analysis

The passage of Senate Bill 743 (SB 743) in the fall of 2013 led to a change in the way that transportation impacts are measured under CEQA. Starting on July 1, 2020, automobile delay and LOS may no longer be used as the performance measure to determine the transportation impacts of land development projects under CEQA. Instead, an alternative metric that supports the goals of the SB 743 legislation will be required. Although there is no requirement to use any particular metric, the use of VMT has been recommended by the Governor's Office of Planning and Research. This requirement does not modify the discretion lead agencies have to develop their own methodologies or guidelines, or to analyze impacts to other components of the transportation system, such as walking, bicycling, transit, and safety. SB 743 also applies to transportation projects, although agencies were given flexibility in the determination of the performance measure for these types of projects.

The intent of SB 743 is to bring CEQA transportation analyses into closer alignment with other statewide policies regarding greenhouse gases, complete streets, and smart growth. Using VMT as a performance measure instead of LOS is intended to discourage suburban sprawl, reduce greenhouse gas emissions, and encourage the development of smart growth, complete streets, and multimodal transportation networks.

Sacramento County Department of Transportation (SacDOT) has developed screening criteria for development projects. The screening criteria VMT thresholds of significance are summarized in Table IS-1.

Table IS-1: Screening Criteria for CEQA Transportation Analysis

Type	Screening Criteria
Small Projects	• Projects generating less than 237 average daily traffic (ADT)
Local-Serving Retail[1]	• 100,000 square feet of total gross floor area or less; OR if supported by a market study with a capture area of 3 miles or less; AND • Local Serving: Project does not have regional-serving characteristics.
Local-Serving Public Facilities/Services	• Transit centers • Day care center • Public K-12 schools • Neighborhood park (developed or undeveloped) • Community center • Post offices • Police and fire facilities • Branch libraries • Government offices (primarily serving customers in-person) • Utility, communications, and similar facilities • Water sanitation, waste management, and similar facilities
Projects Near Transit Stations	• High-Quality Transit: Located within ½ a mile of an existing major transit stop[2] or an existing stop along a high-quality transit corridor[3]; AND • Minimum Gross Floor Area Ratio (FAR) of 0.75 for office projects or components; AND • Parking: Provides no more than the minimum number of parking spaces required[4]; AND • Sustainable Communities Strategy (SCS): Project is not inconsistent with the adopted SCS; AND • Affordable Housing: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units; AND • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.

Restricted Affordable Residential Projects	• Affordability: Screening criteria only apply to the restricted affordable units; AND • Restrictions: Units must be deed-restricted for a minimum of 55 years; AND • Parking: Provides no more than the minimum number of parking spaces required4; AND • Transit Access: Project has access to transit within a ½ mile walking distance; AND • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.

[1] See Appendix A for land use types considered to be retail.

[2] Defined in the Pub. Resources Code § 21064.3 ("Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods").

[3] Defined in the Pub. Resources Code § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours").

[4] Sacramento County Zoning Code Chapter 5: Development Standards

DISCUSSION OF PROJECT IMPACTS

This project consists entirely of affordable housing units, which screen out from VMT analysis provided certain other criteria are met. Principally, the project must have transit access within a 1/2 mile walking distance and provide no more than the minimum number of required parking spaces. The project is located within 0.5-mile of bus stops located on 47th Avenue. The project does not have more than the minimum number of required parking spaces. Bicycle and pedestrian infrastructure are proposed as part of this project and therefore, would not adversely impact either mode of transportation. Therefore, further VMT analysis is not necessary.

CONCLUSION

Impacts related to VMT are considered ***less than significant***.

AIR QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

- Expose sensitive receptors to pollutant concentrations in excess of standards.

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that

increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-3). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-4).

Table IS-2: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment Classification = Serious (1 hour Standard[1])	Non-Attainment, Classification = Severe -15* (1 hour[2] and 8 hour[3] Standards)
Particulate Matter 10 Micron	Non-Attainment (24 hour Standard and Annual Mean)	Attainment (24 hour standard)
Particulate Matter 2.5 Micron	Attainment (Annual Standard)	Non-Attainment (24 hour Standard) and Unclassified/Attainment (Annual)
Carbon Monoxide	Attainment (1 hour and 8 hour Standards)	Attainment (1 hour and 8 hour Standards)
Nitrogen Dioxide	Attainment (1 hour Standard and Annual)	Unclassified/Attainment (1 hour and Annual)
Sulfur Dioxide[4]	Attainment (1 hour and 24 hour Standards)	Attainment (1 hour)
Lead	Attainment (30 Day Standard)	Attainment (3-month rolling average)
Visibility Reducing Particles	Unclassified (8 hour Standard)	No Federal Standard
Sulfates	Attainment (24 hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (1 hour Standard)	No Federal Standard

1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.

2. Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009. SMAQMD has requested EPA recognize attainment to fulfill the requirements.

3. For both that 1997 and the 2008 Standard.
4. Cannot be classified

*Federal designations based on information from http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol17/pdf/CFR-2010-title40-vol17-sec81-305.pdf

*California Area Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports

Source: SMAQMD. "Air Quality Standards Attainment Status". *Air Quality Data*. Accessed: May 18, 2020. http://www.airquality.org/air-quality-health/air-quality-pollutants-and-standards

Table IS-3: SMAQMD Significance Thresholds

	ROG[1] (lbs/day)	NO_x (lbs/day)	CO ($\mu g/m^3$)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Construction (short-term)	None	85	CAAQS[2]	80[3*]	82[3*]
Operational (long-term)	65	65	CAAQS	80[3*]	82[3*]

1. Reactive Organic Gas

2. California Ambient Air Quality Standards

3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.

Construction Emissions/Short-Term Impacts

Short-term air quality impacts are mostly due to dust (PM_{10} and $PM_{2.5}$) generated by construction and development activities, and emissions from equipment and vehicle engines (NO_x) operated during these activities. Dust generation is dependent on soil type and soil moisture, as well as the amount of total acreage actually involved in clearing, grubbing and grading activities. Clearing and earthmoving activities comprise the major source of construction dust generation, but traffic and general disturbance of the soil also contribute to the problem. Sand, lime or other fine particulate materials may be used during construction, and stored on-site. If not stored properly, such materials could become airborne during periods of high winds. The effects of construction activities include increased dust fall and locally elevated levels of suspended particulates. PM_{10} and $PM_{2.5}$ are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

Particulate Matter and Ozone Precursor (NO_x) Emissions

The SMAQMD Guide includes screening criteria for construction-related particulate matter and NO_x. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction PM_{10}, $PM_{2.5}$, or NO_x thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills); or,
- Require import or export of soil materials that will require a considerable amount of haul truck activity

Some PM_{10} and $PM_{2.5}$ emissions during project construction can be reduced through compliance with institutional requirements for dust abatement and erosion control. These institutional measures include the SMAQMD "District Rule 403-Fugitive Dust" and measures in the Sacramento County Code relating to land grading and erosion control [Title 16, Chapter 16.44, Section 16.44.090(K)].

The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply.

DISCUSSION OF PROJECT IMPACTS

The project screens out using SMAQMD's screening criteria. Nevertheless, CalEEMod was used to provide estimates for construction-related emissions (Appendix A). The estimated emissions are shown in Table IS-5.

Table IS-4: Construction-Related Emission Estimates

	Emissions in pounds per day			
	ROG	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Thresholds	None	85	80	82
Estimated Emissions	90.56	56.70	13.58	7.95
CalEEMod Version 2016.3.2				

As shown in Table IS-5, construction-related emissions are below SMAQMD's thresholds of significance for criteria pollutants.

CONSTRUCTION

Impacts related to construction-related emissions are considered ***less than significant***.

OPERATIONAL EMISSIONS/LONG-TERM IMPACTS

Once a project is completed, additional pollutants are emitted through the use, or operation, of the site. Land use development projects typically involve the following sources of emissions: motor vehicle trips generated by the land use; fuel combustion from landscape maintenance equipment; natural gas combustion emissions used for space and water heating; evaporative emissions of ROG associated with the use of consumer products; and, evaporative emissions of ROG resulting from the application of architectural coatings.

DISCUSSION OF PROJECT IMPACTS

CalEEMod was used to estimate operational estimates for the project. The CalEEMod operational estimates are shown in Table IS-6.

Table IS-5: CalEEMod Operational Emission Estimates

Operational Year 2022	Criteria pollutants in pounds per day			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Thresholds	65	85	80	82
Operational (long-term)	5.21	6.96	5.02	1.44

Table IS-6 shows that all operational emission estimates are below SMAQMD's significance thresholds.

CONCLUSION

The project will not exceed significance thresholds during the operational period; impacts are considered ***less than significant***.

TOXIC AIR CONTAMINANTS

The California Air Resources Board (CARB) indicates that one of the highest public health priorities is the reduction of diesel particulate matter generated by vehicles on California's highways, as it is one of the primary toxic air contaminants (TAC). The California Health and Safety Code describes as "air pollutants which may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health known to cause cancer or other human health impacts." In September 2020, SMAQMD released the Mobile Sources Air Toxics Protocol (MSAT Protocol) Guidance Document to assist local governments with analyzing TAC health impacts along high-traffic roads and rail ways.

The mapping tool identifies all roads that exceed 100,000 average daily trips (ADT) as well as all railways in Sacramento County, with the exception of Sacramento Southern Rail Road, which operates excursion train rides and Sacramento Valley Rail Road, a rail spur that serves McClellan Park. Roadways that exceed 100,000 ADT in the county include:

- Interstate 5
- Interstate 80
- Interstate Business 80
- US Highway 50
- State Route 99
- Segments of State Route 160, Sunrise Boulevard, Watt Avenue, and Hazel Avenue

Neither Sacramento County, CARB, nor SMAQMD have set particular risk-based or concentration-based thresholds of significance for mobile source pollutants. Therefore, this discussion is included for disclosure purposes, so as not to underestimate the level of health risk associated with locating a project next to high-traffic roadway.

DISCUSSION OF PROJECT IMPACTS

The proposed project site is located immediately north of northbound State Route 99 (SR 99), thus increasing the probability that a resident would be exposed to diesel particulate matter (DPM, represented as PM_{10}), Total Organic Gases (TOG), and concentration levels of fine particulate matter ($PM_{2.5}$). SMAQMD's mapping tool was utilized to estimate the health risk associated with the project's location. Table IS-7 shows the mapping tool results.

Table IS-6: SMAQMD Mapping Tool Results

Health Risk Variable	Estimated Value
DPM (in one million)	185
TOG (in one million)	36
Combined DPM & TOG (in one million)	221
$PM_{2.5}$ (µg/m3)	9.5
Notes: DPM=Diesel particulate matter TOG=Total organic gases (µg/m3)=micrograms per cubic meter	

Table IS-7 shows the cancer risk for combined DPM + TOG is 221 cancers per million people above and beyond the background DPM cancer risk of 520 cancers per million. Table IS-7 shows estimated concentration of PM2.5 as 9.5 micrograms per cubic meter of air (µg/m3). It is important to note that these numbers do not take into account existing or planned features such as sound walls and vegetation, which reduce pollutant concentrations, improve pollutant dispersion, and thus, improve air quality.The MSAT Protocol Guidance Document recommends that exposure reduction measures be considered for all projects located next to major roadways and/or railways. The document recommends three exposure reduction strategies:

- Indoor air treatment: Heating, Ventilation and Air Conditioning (HVAC) filters and portable air cleaners
- Land use design
- Solid and vegetation barriers

INDOOR AIR TREATMENT

SMAQMD recommends the installation and use of high efficiency HVAC units in all new homes. Indoor air treatment systems such as HVAC units and portable air cleaners can reduce indoor air particulate concentration levels by 50 to 99 percent with high efficiency HVAC filters. HVAC filters are rated by the size of particles they are designed to capture. Typically, manufacturers report the effectiveness using the Minimum Efficiency Reporting Value (MERV) rating system. Others use a Micro-Particle Performance Rating (MPR), or a Filter Performance Rating (FPR). SMAQMD

recommends a MERV of at least 13, an MPR of at least 1500, or an FPR of at least 10. An FPR of 10 and an MPR of 1500 are equivalent to a MERV 13 rating.

LAND USE DESIGN

Both CARB and SMAQMD recognize that the use of land use design can reduce particulate exposure, pollutant dispersion, and reduce concentrations. The distancing of sensitive receptors from the pollution source is key to reducing pollutant concentrations. SMAQMD's MSAT Protocol Guidance recommends varying building shape and heights, placement of open spaces, and placement of roadways, wider sidewalks, and parking lots between the receptor and source to improve pollutant dispersion and air quality.

SOLID BARRIERS AND USE OF VEGETATION AS BARRIERS

The US Environmental Protection Agency's (EPA) *Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality (2016)* identifies the use of solid barriers, such as sound walls, as an effective means of providing vertical dispersion, which would reduce concentrations. The EPA found that solid barriers reduce pollutant concentrations by 10 to 50 percent. The document also recommends the use of vegetation barriers for reducing concentrations and improving air quality. SMAQMD developed guidance specific to the Sacramento area.

SMAQMD's *Landscaping Guidance for Improving Air Quality near Roadways* (2017) recommends that projects near major roadways incorporate vegetation barriers meeting a minimum 33 feet of an uninterrupted vegetation thickness and at least 16 feet tall. This can be accomplished by spacing the planting of trees and shrubs to provide a vertical vegetative barrier. SMAQMD's *Landscaping Guidance* includes a variety of vegetation planting recommendations and species lists appropriate to the Sacramento region to meet the recommended dimensions.

CONCLUSION

The project intends to use a hybrid approach utilizing elements from each of the three reduction strategies. HVAC systems have become commonplace in new construction and effectively reduce noise, improve air quality, and provide cooling during the hot summer months. The project proponents intend to incorporate HVAC systems in all of the units. There is an existing solid, noise barrier between SR 99 and the property. The project intends to provide buffering from SR 99 by extending 44th Street along the southern property line and placing a parking lot and outdoor activity area between the homes and SR 99. Additionally, the proposed landscaping plan has incorporated dense, overlapping tree canopy along the southern property line.

CRITERIA POLLUTANT HEALTH RISKS

All criteria air pollutants can have human health effects at certain concentrations. Air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS). The NAAQS and CAAQS are informed by a wide range of scientific evidence, which demonstrates that there are known safe concentrations of criteria air pollutants.

Because the NAAQS and CAAQS are based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of these standards, the thresholds established by air districts are also protective of human health. Sacramento County is currently in nonattainment of the NAAQS and CAAQS for ozone. Projects that emit criteria air pollutants in exceedance of SMAQMD's thresholds would contribute to the regional degradation of air quality that could result in adverse human health impacts.

Acute health effects of ozone exposure include increased respiratory and pulmonary resistance, cough, pain, shortness of breath, and lung inflammation. Chronic health effects include permeability of respiratory epithelia and the possibility of permanent lung impairment (EPA 2016).

HEALTH EFFECTS SCREENING

In order to estimate the potential health risks that could result from the operational emissions of ROG, NO_X, and $PM_{2.5}$, PER staff implemented the procedures within SMAQMD's I*nstructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools* (SMAQMD's Instructions). To date, SMAQMD has published three options for analyzing projects: small projects may use the Minor Project Health Screening Tool, while larger projects may use the Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

Both the Minor Project Health Screening Tool and Strategic Area Project Health Screening Tool are based on the maximum thresholds of significance adopted within the five air district regions contemplated within SMAQMD's *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (SMAQMD's Friant Guidance; October 2020). The air district thresholds considered in SMAQMD's Friant Guidance included thresholds from SMAQMD as well as the El Dorado County Air Quality Management District, the Feather River Air Quality Management District, the Placer County Air Pollution Control District, and the Yolo Solano Air Quality Management District. The highest allowable emission rates of NO_X, ROG, PM_{10}, and $PM_{2.5}$ from the five air districts is 82 pounds per day (lbs/day) for all four pollutants. Thus, the Minor Project Health Screening Tool is intended for use by projects that would result in emissions at or below 82 lbs/day, while the Strategic Area Project Health Screening Tool is intended for use by projects that would result in emissions between two and eight times greater than 82 lbs/day. The Strategic Area Project Screening Model was prepared by SMAQMD for five locations throughout the Sacramento region for two scenarios: two times and eight times the threshold of significance level (2xTOS and 8xTOS). The corresponding emissions levels included in the model for 2xTOS were 164 lb/day for ROG and NO_X, and 656 lb/day under the 8xTOS for ROG and NO_X (SMAQMD 2020).

As noted in SMAQMD's Friant Guidance, "each model generates conservative estimates of health effects, for two reasons: The tools' outputs are based on the simulation of a full year of exposure at the maximum daily average of the increases in

air pollution concentration… [and] [t]he health effects are calculated for emissions levels that are very high" (SMAQMD 2020).

The model derives the estimated health risk associated with operation of the project based on increases in concentrations of ozone and $PM_{2.5}$ that were estimated using a photochemical grid model (PGM). The concentration estimates of the PGM are then applied to the U.S. Environmental Protection Agency's Benefits Mapping and Analysis Program (BenMAP) to estimate the resulting health effects from concentration increases. PGMs and BenMAP were developed to assess air pollution and human health impacts over large areas and populations that far exceed the area of an average land use development project. These models were never designed to determine whether emissions generated by an individual development project would affect community health or the date an air basin would attain an ambient air quality standard. Rather, they are used to help inform regional planning strategies based on cumulative changes in emissions within an air basin or larger geography.

It must be cautioned that within the typical project-level scope of CEQA analyses, PGMs are unable to provide precise, spatially defined pollutant data at a local scale. In addition, as noted in SMAQMD's Friant Guidance, "BenMAP estimates potential health effects from a change in air pollutant concentrations, but does not fully account for other factors affecting health such as access to medical care, genetics, income levels, behavior choices such as diet and exercise, and underlying health conditions" (2020). Thus, the modeling conducted for the health risk analysis is based on imprecise mapping and only takes into account one of the main public health determinants (i.e., environmental influences).

DISCUSSION OF PROJECT IMPACTS

Since the project was below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Table IS-8 and Table IS-9.

Table IS-7: $PM_{2.5}$ Health Risk Estimates

$PM_{2.5}$ Health Endpoint	Age Range [1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5] (Mean)	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2] (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
Respiratory					
Emergency Room Visits, Asthma	0 - 99	0.70	0.60	0.0033%	18,419
Hospital Admissions, Asthma	0 - 64	0.045	0.039	0.0021%	1,846
Hospital Admissions, All Respiratory	65 - 99	0.22	0.18	0.00092%	19,644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.11	0.097	0.00041%	24,037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000055	0.000047	0.0012%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0050	0.0044	0.0014%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.012	0.011	0.0015%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.020	0.018	0.0014%	1,239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.070	0.062	0.0012%	5,052
Mortality					
Mortality, All Cause	30 - 99	1.3	1.1	0.0025%	44,766

Notes:

1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region.
3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-

District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.

4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.
5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.*

Table IS-8: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range[1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5] (Mean)	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2] (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.036	0.025	0.00013%	19,644
Emergency Room Visits, Asthma	0 - 17	0.18	0.13	0.0022%	5,859
Emergency Room Visits, Asthma	18 - 99	0.27	0.20	0.0016%	12,560
Mortality					
Mortality, Non-Accidental	0 - 99	0.021	0.015	0.000050%	30,386

Notes:

1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region.
3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.
4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.
5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.*

Again, it is important to note that the "model outputs are derived from the numbers of people who would be affected by [the] project due to their geographic proximity and based on average population through the Five-District-Region. The models do not take into account population subgroups with greater vulnerabilities to air pollution, except for ages for certain endpoints" (SMAQMD 2020). Therefore, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with project implementation to specific health outcomes. While the effects noted above could manifest in individuals, actual effects depend on factors specific to each individual, including life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even if this specific medical information was known about each individual, there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects listed in the tables. Ultimately, the health effects associated with the project, using the SMAQMD guidance "are conservatively estimated, and the actual effects may be zero" (SMAQMD 2020).

CONCLUSION

Neither SMAQMD nor the County of Sacramento have adopted thresholds of significance for the assessment of health risks related to the emission of criteria pollutants. Furthermore, an industry standard level of significance has not been adopted or proposed. Due to the lack of adopted thresholds of significance the health risks, this data is presented for informational purposes and does not represent an attempt to arrive at any level-of-significance conclusions.

NOISE

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in exposure of persons to, or generation of, noise levels in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies.

NOISE FUNDAMENTALS & TERMINOLOGY

Noise is often described as unwanted sound, and thus is a subjective reaction to the physical phenomenon of sound. Sound is variations in air pressure that the ear can detect. Sound levels are measured and expressed in decibels (dB), which is the unit for describing the amplitude of sound1. Because sound pressure levels are defined as logarithmic numbers, the values cannot be directly added or subtracted. For example, two sound sources, each producing 50 dB, will produce 53 dB when combined, not 100

[1] Equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals.

dB. This is because two sources have two times the energy (not volume) of one source, which results in a 3 dB increase in noise levels.

Most environmental sounds consist of several frequencies, with each frequency differing in sound level. The intensities of each frequency combine to generate sound. Acoustical professionals quantify sounds by "weighting" frequencies based on how sensitive humans are to that particular frequency. Using this method, low and extremely high frequency sounds are given less weight, or importance, while mid-range frequencies are given more weight, because humans can hear mid-range frequencies much better than low and very high frequencies. This method is called "A" weighting, and the units of measurement are called dBA (A-weighted decibel level). In practice, noise is usually measured with a meter that includes an electrical "filter" that converts the sound to dBA. The threshold at which one hears sounds is considered to be zero (0) dBA. The range of sound in normal human experience is 0 to 140 dBA. Decibels and other technical terms are defined in Table IS-10.

The ambient noise level is defined as the noise from all sources near and far, and refers to the noise levels that are present before a noise source being studied is introduced. A synonymous term is pre-project noise level.

According to the CEQA Guidelines a noise impact may be significant if the project will result in exposure of persons to or generation of noise levels in excess of standards established by the lead agency (in this case, the Sacramento County General Plan, Zoning Code, and Noise Ordinance), or applicable standards of other agencies; expose people residing or working in the project area to excessive airport noise levels; expose people to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or result in a substantial temporary or periodic increase in ambient noise level in the project vicinity above levels existing without the project. The Sacramento County General Plan Policy NO-7 establishes a significance threshold of 65 dB L_{dn}/CNEL for outdoor activity areas (backyards) and of 45 dB L_{dn}/CNEL or less in indoor areas. Typically, potential sources of significant noise include airports, some commercial activities, industrial activities, railroads, and traffic.

Table IS-9: Acoustical Terminology

TERM	DEFINITION
Ambient Noise Level:	The composite of noise from all sources near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.
Intrusive Noise:	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.
Decibel, dB:	A unit for describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals (20 micronewtons per square meter).
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure.
Community Noise Equivalent Level, CNEL*:	The average equivalent sound level during a 24-hour day, obtained after addition of approximately five decibels to sound levels in the evening form 7:00 p.m. to 10:00 p.m. and ten decibels to sound levels in the night before 7:00 a.m. and after 10:00 p.m.
Day/Night Noise Level, L_{dn}*:	The average equivalent sound level during a 24-hour day, obtained after addition of ten decibels to sound levels in the night after 10:00 p.m. and before 7:00 a.m.
Equivalent Noise Level, L_{eq}:	The average noise level during the measurement or sample period. L_{eq} is typically computed over 1, 8 and 24-hour sample periods.
L_{max}, L_{min}:	The maximum or minimum sound level recorded during a noise event.
L_n :	The sound level exceeded "n" per percent of the time during a sample interval. L_{10} equals the level exceeded 10 percent of the time (L_{90}, L_{50} , etc.)
Noise Exposure Contours:	Lines drawn about a noise source indicating constant levels of noise exposure. CNEL and L_{dn} contours are frequently utilized to describe community exposure to noise.
Sound Exposure Level, SEL; or Single Event Noise Exposure Level, SENEL:	The level of noise accumulated during a single noise event, such as an aircraft overflight, with reference to a duration of one second. More specifically, it is the time integrated A-weighted squared sound pressure level for a stated time interval or event, based on a reference pressure of 20 micropascals and a reference duration of one second.
Sound Level, dBA:	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear and gives good correlation with subjective reactions to noise.

REGULATORY SETTING

In order to limit population exposure to physically and/or psychologically damaging noise levels, the State of California and Sacramento County have established standards and ordinances to control noise.

STATE OF CALIFORNIA

The California Department of Health Services (DHS) office of Noise Control has studied the relationship between noise levels and different land uses. As a result, the DHS has established four categories for judging the severity of noise intrusion on specified land use. Noise in the "normally acceptable" category places no undue burden on affected receptors and would need no mitigation. As noise rises into the "conditionally acceptable" range, some mitigation of exposure (as established by an acoustical study) would be warranted. At the next level, noise intrusion is so severe that it is classified "normally unacceptable" and would require extraordinary noise reduction measures to avoid disruption. Finally, noise in the "clearly unacceptable" category is so severe that it cannot be mitigated.

Title 24 of the California Administrative Code establishes standards governing interior noise levels that apply to all new multifamily residential units in California. The standards require that acoustical studies be performed prior to construction at building locations where the existing L_{dn} exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum L_{dn} noise levels to 45 dBA in any inhabitable room. The U.S. Department of Housing and Urban Development (HUD) has set an L_{dn} of 45 as its goal for interior noise in residential units built with HUD funding.

COUNTY GENERAL PLAN NOISE ELEMENT

The goals of the Sacramento County General Plan Noise Element are to: (1) protect the citizens of Sacramento County from exposure to excess noise and (2) protect the economic base of Sacramento County by preventing incompatible land uses from encroaching upon existing planned noise-producing uses. The General Plan defines a noise sensitive outdoor area as the primary activity area associated with any given land use at which noise sensitivity exists. Noise sensitivity generally occurs in locations where there is an expectation of relative quiet, or where noise could interfere with the activities taking place in an outdoor activity area. An example is a backyard, where loud noise could interfere with the ability to engage in normal conversation.

The Noise Element of the Sacramento County General Plan establishes noise exposure criteria to aid in determining land use compatibility by defining the limits of noise exposure for sensitive land uses. There are policies for noise receptors or sources, transportation or non-transportation noise, and interior and exterior noise.

> NO-1. The noise level standards for noise-sensitive areas of *new* uses affected by traffic or railroad noise sources in Sacramento County are shown by Table 1 (Table IS-11 of this report). Where the noise level standards of Table 1 are predicted to be exceeded at new uses proposed within Sacramento County which are affected by traffic or railroad noise, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 1 standards (reference Table IS-11).

Table IS-10: Noise Standards for New Uses Affected by Traffic and Railroad Noise

New Land Use	Sensitive Outdoor Area – L_{dn}	Sensitive Interior Area – L_{dn}
All Residential[5]	65	45
Transient lodging[3,5]	65	45
Hospitals and nursing homes[3,4,5]	65	45
Theaters and auditoriums[3]	None	35
Churches, meeting halls, schools, libraries, etc.[3]	65	40
Office buildings[3]	65	45
Commercial buildings[3]	None	50
Playgrounds, parks, etc.	70	None
Industry[3]	65	50

1. Sensitive areas are defined in acoustical terminology section.
2. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.
3. Where there are no sensitive exterior spaces proposed for these uses, only the interior noise level standard shall apply.
4. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation either by hospital staff or patients.
5. If this use is affected by railroad noise, a maximum (L_{max}) noise level standard of 70 dB shall be applied to all sleeping rooms to reduce the potential for sleep disturbance during nighttime train passages.

METHODOLOGY

The project site is located adjacent to SR 99. Bollard Acoustical Associates, Inc. (Bollard) was retained by the applicant to prepare a noise assessment (Appendix B). The intent of the noise level measurements was to determine the project noise exposure from SR 99 and provide noise reduction recommendations where necessary.

The Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA-RD-77-108) was used to predict traffic noise levels at the project site. The model is based upon the California Vehicle Noise (CALVENO) emission factors for automobiles, medium trucks and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA model was developed to predict hourly Leq values for free flowing traffic conditions, and is considered accurate within 1.5 dB in most situations.

Bollard conducted traffic noise level measurements at the project site on November 15, 2019. Concurrent Highway 99 traffic counts were conducted during the survey as well.

The measurements were conducted at heights of 5, 10 and 15 feet above existing ground elevation at the location of the nearest building facades to Highway 99 to quantify differences in traffic noise levels at the future first, second and third floor facades of the development.

DISCUSSION OF PROJECT IMPACTS

Bollard's data indicate that the model provided a reasonably accurate prediction of SR 99 traffic noise levels at the unshielded third floor façade position located 25 feet above ground (within 1 dB). At the first and second floor measurement positions located 5 and 15 feet above ground, which were shielded by the intervening, 14-foot tall soundwall (located between the project site and SR 99), the measured levels were 9 and 5 dB lower than the unshielded third floor levels.

At the nearest proposed outdoor activity area, the proposed three-story residential structures themselves will provide additional shielding of SR 99 traffic noise beyond that provided by the existing SR 99 traffic noise barrier. Bollard used the FHWA noise barrier effectiveness algorithms to predict the shielding that would be provided by the combination of soundwall and intervening buildings. The results of that analysis indicate that future traffic noise exposure at the outdoor activity areas would be approximately 15 dB. This calibration offset was applied to the FHWA model for the prediction of future outdoor activity area noise expose shown in Table IS-12.

Table IS-11: Predicted Future Highway 99 Traffic Noise Levels at Project Site

Location	Distance from Roadway Centerline (feet)[2]	Calibration Offset, dBA[3]	Predicted Noise Level, L_{dn} (dB)
Nearest 1st floor building facades	160	-9	69
Nearest 2nd floor building facades	160	-5	73
Nearest 3rd floor building facades	160	0	78
Nearest Outdoor Activity Area	230	-15	61

[1] A complete listing of FHWA model inputs and results are provided in Appendix B.
[2] Distance measured from the centerline of Highway 99.
[3] Offsets to the FHWA model are described in the "FHWA Model Calibration" section of this report.
Source: Bollard Acoustical Consultants, Inc. (2019)

OUTDOOR ACTIVITY AREAS

As indicated in Table IS-12, future exterior traffic noise levels at the primary outdoor activity area of the residences proposed nearest to SR 99 would be approximately 61 dBA L_{dn}. This predicted level satisfies the Sacramento County and HUD 65 dB L_{dn} requirement applicable to new residential developments. As a result, no additional noise mitigation would be required for the outdoor activity areas of this development.

INTERIOR NOISE LEVELS

As indicated in Table IS-12, future exterior traffic noise levels at the nearest building facades are predicted to vary depending on the height of the façade above ground. For

example, third floor façade noise levels will be approximately 9 dB higher than first floor façade levels due to reduced shielding of SR 99 traffic noise by the intervening 14-foot tall soundwall. As a result, varying degrees of building façade noise exposure would be required to ensure compliance with the County and HUD interior noise standard of 45 dBA L_{dn}. Specifically, building façade noise reductions of 24, 28, and 33 dBA would be required of first, second, and third floor facades to meet that standard. Bollard recommended an additional 3 dB of building façade noise reduction beyond the minimum required to satisfy the noise standard.

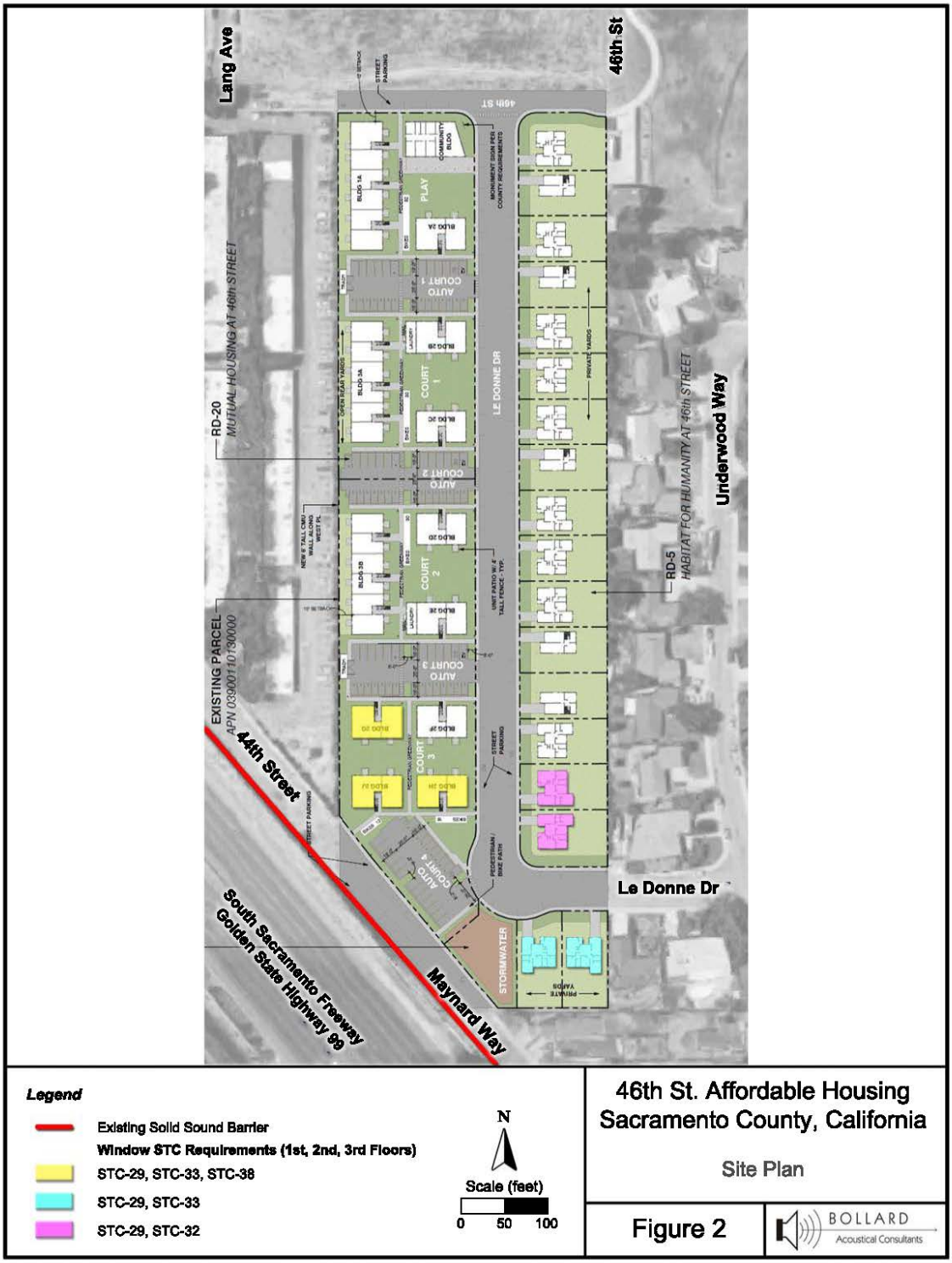
Standard residential construction (stucco siding, windows with a Sound Transmission Class (STC) rating of STC-27, door weather-stripping, exterior wall insulation, composition plywood roof), results in an exterior to interior noise reduction of at least 25 dB with windows closed and approximately 15 dB with windows open. Therefore, standard construction practices would not be adequate for this development. In order to satisfy the County and HUD 45 dBA L_{dn} interior noise level standard with a margin of safety, construction upgrades would be required for the exterior facades of this development proposed on close proximity to SR 99.

In order to ensure compliance with the Sacramento County General Plan 45 dB L_{dn} interior noise level standard with a margin of safety, air conditioning shall be provided for all units throughout the development so that windows and doors can be kept closed as desired for acoustical isolation. Additionally, all exterior door and window assemblies of the shaded residences identified in Plate IS-3 (Figure 2 of Noise Report), from which Highway 99 will be partially or completely visible, shall provide the minimum STC ratings identified in Plate IS-3 (Figure 2 of Noise Report; Appendix B).

CONCLUSION

Compliance with the required exterior STC-ratings will ensure will ensure that the project meets the County and HUD interior noise level of 45 dBA L_{dn}. Impacts related to noise are considered ***less than significant with mitigation***.

Plate IS-3: Required Window STC Ratings



HYDROLOGY AND WATER QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.
- Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.
- Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)
- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

HYDROLOGY & DRAINAGE

The project is generally within the Morrison Creek Watershed. The property is located within a FEMA designated "area with reduced flood risk due to levee" Zone X. Flows at the northern end of the property drain to the northwest where they are channeled under SR 99 and into an open, drainage channel that runs parallel to SR 99 and converges with Morrison Creek. The cul-de-sac located immediately southeast of the project site, directs flows into Morrison Creek, which flows under SR 99 and converges with the aforementioned drainage channel. This section of Morrison Creek is concrete-lined and continues southwesterly to the Regional County Sanitation District's Wastewater Treatment Plant.

DISCUSSION OF PROJECT IMPACTS

The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding.

CONCLUSION

Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are ***less than significant***.

URBAN LEVEL OF PROTECTION

In 2007, several bills were passed that amended the California Water Code and Government Code to strengthen flood protection and link land use planning to flood planning, including SB 5 (2007), as amended by SB 1278 (2012) and AB 1259 (2013). One of the primary purposes of SB-5 and related legislation is to better tie local land use decisions that allow development in floodplains to the potential consequences in the event of a levee break.

A key requirement of SB-5 is that local jurisdictions amend their General Plans and Zoning Code to require 200-year flood protection (urban level of protection) in urban or urbanizing areas, and establish the requirement that when land uses are approved in Flood Hazard Zones, the county must make one of the following findings:

1. The facilities of the State Plan of Flood Control or other flood management facilities protect the property to the Urban Level of Flood Protection (ULOP) in urban and urbanizing areas or the Federal Emergency Management Agency (FEMA) standard of flood protection in non-urbanized areas.

2. The county has imposed conditions on the entitlement or permit that will protect the property to the ULOP in urban and urbanizing areas or the FEMA standard of flood protection in non-urbanized areas.

3. The local flood management agency has made adequate progress on the construction of a flood protection system that will result in flood protection equal to or greater than the ULOP in urban or urbanizing areas by 2025.

4. The property is in an undetermined risk area and has met the ULOP.

In most cases, the ULOP is defined as protection against a 200-year flood, although there are exceptions for shallow flooding or flooding from small watersheds. Levee systems in the Sacramento region require major improvements to provide 200-year flood protection. Therefore, the County and other land use agencies will need to make a finding of adequate progress towards a ULOP to authorize new development in the areas being protected. The ULOP annual reports and the original 2016 ULOP Plan are important pieces of evidence that the land use agencies need and should review in order to make this finding for its respective jurisdictions.

DISCUSSION OF PROJECT IMPACTS

The project is located in two ULOP areas, the American River and Morrison Creek areas. The levee-protected ULOP area is American River and the non-levee protected area is Morrison Creek. The Sacramento Area Flood Control Agency's (SAFCA) "Urban Level of Flood Protection Annual Report" (July 2020) concluded that SAFCA has completed a number of improvements on the American River Levee Improvements Project and is on-track to have the project completed by 2025, which will satisfy the 200-year flood protection requirement for the American River (Finding #3).

The Morrison Creek area is part of the South Sacramento Streams Group. The U.S. Army Corps of Engineers (Corps) is the lead agency for the area and completed a number of structural improvements to the levees and channels along Morrison Creek and its tributaries in South Sacramento. Physical work is complete; however, reports, an Operations and Maintenance Manual, and fiscal closeout are still outstanding. The completion of the physical facilities protect the property to the ULOP (Finding #1). Moreover, Section 906-02(F) of the County Floodplain Management Ordinance requires new residential construction subject to ULOP must have the lowest floor at or above the 200-year floodwater surface elevation (Finding #2).

CONCLUSION

Compliance with the County Floodplain Management Ordinance will ensure that impacts are ***less than significant***.

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rains will wash the sediment into storm drains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include, but are not limited to, vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

Sacramento County has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by Regional Water Board. The Municipal Stormwater Permit requires the County to reduce pollutants in stormwater discharges to the maximum extent practicable and to effectively prohibit non-stormwater discharges. The County complies with this permit in part by developing and enforcing ordinances and requirements to reduce the discharge of sediments and other pollutants in runoff from newly developing and redeveloping areas of the County.

The county has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the county's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one or more acres or moving 350 cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control best management practices (BMPs) that will be implemented during construction to prevent sediment from leaving the site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

In addition to complying with the county's ordinances and requirements, construction sites disturbing one or more acres are required to comply with the State's General Stormwater Permit for Construction Activities (CGP). CGP coverage is issued by the State Water Resources Control Board (State Board) http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml and enforced by the Regional Water Board. Coverage is obtained by submitting a Notice of Intent (NOI) to the State Board prior to construction and verified by receiving a WDID#. The CGP requires preparation and implementation of a site-specific

Stormwater Pollution Prevention Plan (SWPPP) that must be kept on site at all times for review by the State inspector.

Applicable projects applying for a county grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the county has no enforcement authority related to the CGP, the county does have the authority to ensure sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components.

The project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the county ordinances and the state's CGP.

Erosion controls should always be the *first line of defense*, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the *second line of defense*; they help to filter sediment out of runoff before it reaches the storm drains and local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

In addition to erosion and sediment controls, the project must have BMPs in place to keep other construction-related wastes and pollutants out of the storm drains. Such practices include, but are not limited to: filtering water from dewatering operations, providing proper washout areas for concrete trucks and stucco/paint contractors, containing wastes, managing portable toilets properly, and dry sweeping instead of washing down dirty pavement.

It is the responsibility of the project proponent to verify that the proposed BMPs for the project are appropriate for the unique site conditions, including topography, soil type and anticipated volumes of water entering and leaving the site during the construction phase. In particular, the project proponent should check for the presence of colloidal clay soils on the site. Experience has shown that these soils do not settle out with conventional sedimentation and filtration BMPs. The project proponent may wish to conduct settling column tests in addition to other soils testing on the site, to ascertain whether conventional BMPs will work for the project.

If sediment-laden or otherwise polluted runoff discharges from the construction site are found to impact the county's storm drain system and/or waters of the state, the property owner will be subject to enforcement action and possible fines by the county and the Regional Water Board.

Project compliance with requirements outlined above, as administered by the county and the Regional Water Board will ensure that project-related erosion and pollution impacts are ***less than significant***.

OPERATION: STORMWATER RUNOFF

Development and urbanization can increase pollutant loads, temperature, volume and discharge velocity of runoff over the predevelopment condition. The increased volume, increased velocity, and discharge duration of stormwater runoff from developed areas has the potential to greatly accelerate downstream erosion and impair stream habitat in natural drainage systems. Studies have demonstrated a direct correlation between the degree of imperviousness of an area and the degradation of its receiving waters. These impacts must be mitigated by requiring appropriate runoff reduction and pollution prevention controls to minimize runoff and keep runoff clean for the life of the project.

The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Source control BMPs are intended to keep pollutants from contacting site runoff. Examples include "No Dumping-Drains to Creek/River" stencils/stamps on storm drain inlets to educate the public, and providing roofs over areas likely to contain pollutants, so that rainfall does not contact the pollutants. Treatment control measures are intended to remove pollutants that have already been mobilized in runoff. Examples include vegetated swales and water quality detention basins. These facilities slow water down and allow sediments and pollutants to settle out prior to discharge to receiving waters. Additionally, vegetated facilities provide filtration and pollutant uptake/adsorption. The project proponent should consider the use of "low impact development" techniques to reduce the amount of imperviousness on the site, since this will reduce the volume of runoff and therefore will reduce the size/cost of stormwater quality treatment required. Examples of low impact development techniques include pervious pavement and bioretention facilities.

The county requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

Updates and background on the county's requirements for post-construction stormwater quality treatment controls, along with several downloadable publications, can be found at the following websites:

http://www.waterresources.saccounty.net/stormwater/Pages/default.aspx

http://www.beriverfriendly.net/Newdevelopment/

The final selection and design of post-construction stormwater quality control measures is subject to the approval of the County Department of Water Resources; therefore, they should be contacted as early as possible in the design process for guidance. Project compliance with requirements outlined above will ensure that project-related stormwater pollution impacts are ***less than significant***.

BIOLOGICAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat.
- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies.
- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community.
- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species.
- Adversely affect or result in the removal of native or landmark trees

SURVEYS AND METHODOLOGY

Analytical Environmental Services (AES) prepared a biological resources evaluation report on behalf of the applicant. Studies included a floristic survey and an aquatic resources inventory. AES reviewed and analyzed a variety of data from state and federal agencies. A list of special-status species known or with potential to occur on the project site or in the immediate vicinity was developed from database queries of USFWS' Information for Planning and Consultation (IPaC), CDFW's California Natural Diversity Database (CNDDB), and the California Native Plant Society (CNPS) Rare Plant Inventory. Up A Tree Arborist Services (arborist) prepared the tree inventory and arborist report on behalf of the applicant (Attachment C of the Biological Report). Significance findings have been based on the impact conclusions of applicable surveys and studies. In absence of such published documents, the analyses rely on the general definitions of significance.

SURVEYS AND STUDIES

The following technical studies were submitted and/or utilized as part of the biological resources analysis for this project:

- Biological Resources Report (Appendix C)

SOUTH SACRAMENTO COUNTY HABITAT CONSERVATION PLAN (SSHCP)

The SSHCP is a regional approach to addressing development, habitat conservation, and agricultural lands within the south Sacramento County region, including the cities of Galt and Rancho Cordova. The specific geographic scope of the SSHCP includes U.S. Highway 50 to the north, the Sacramento River levee and County Road J11 (connects

the towns of Walnut Grove and Thornton, it is known as the Walnut Grove-Thornton Road) to the west, the Sacramento County line with El Dorado and Amador counties to the east, and San Joaquin County to the south. The SSHCP Project area excludes the City of Sacramento, the City of Folsom, the City of Elk Grove, most of the Sacramento-San Joaquin Delta, and the Sacramento community of Rancho Murieta.

The SSHCP covers 28 different species of plants and wildlife, including 10 that are state and/or federally-listed as threatened or endangered. The SSHCP has been developed as a collaborative effort to streamline permitting and protect covered species habitat. .

On May 15, 2018, the Final SSHCP and EIS/EIR was published in the federal Register for a 30-day review period. Public hearings on the proposed adoption of the final SSHCP, final EIS/EIR, final Aquatic Resources Plan (ARP), and final Implementation Agreement (IA) began in August 2018, and adoption by the County occurred on September 11, 2018. The permit was received on June 12, 2019 from the U.S. Fish and Wildlife Service, July 25, 2019 from the U.S. Army Corps of Engineers, and August 20, 2019 from the California Department of Fish and Wildlife.

The proposed project is in the Urban Development Area (UDA) and considered a covered activity in the SSHCP; therefore, the project must comply with the provisions of the SSHCP and associated permits. The analysis contained below addresses the applicability of the SSHCP, and mitigation has been designed to comply with the SSHCP.

CONSISTENCY WITH THE SOUTH SACRAMENTO COUNTY HABITAT CONSERVATION PLAN

The proposed project's design and construction must comply with all SSHCP requirements including SSHCP avoidance and minimization measures (AMMs). The SSHCP is a habitat-based plan in which mitigation fees are based on impacts to habitat or land cover rather than impacts to individual species.

The land covers outlined in the baseline map are an interpretation of habitat based on remote sensing analyses conducted over a number of years prior to adoption of the SSHCP. The baseline land covers are intended to serve as a guide to for potential habitat present on the project site and are intended to be updated with pedestrian-level biological surveys. During the local impact authorization process, these land covers will be refined, and calculation of project mitigation impact fees will be based on project specific survey and wetland delineation data. The baseline mapping for the project's SSHCP land covers is illustrated in Plate IS-4. Plate IS-5 depicts the updated land cover mapping prepared by the applicant's consultant, Analytical Environmental Services (AES).

The analysis contained in this section is consistent with the protocol for covered species analysis under the SSHCP. Compliance with the SSHCP will ensure that impacts to covered species and their habitat will be less than significant. The mitigation contained in this chapter has been structured such that the required mitigation is consistent with the adopted SSHCP mitigation and monitoring protocols.

The applicant will be required to obtain a signed SSHCP authorization form from the Environmental Coordinator for potential impacts to terrestrial and aquatic habitats. The project will comply with the requirements of the SSHCP, including adherence to the Avoidance and Minimization Measures (Appendix D), as well as payment of fees to support the overall SSHCP Conservation Strategy. The project is consistent with, and aids in the goals set forth in the proposed SSHCP.

Plate IS-4: SSHCP Baseline Land Cover Map

PLATE IS-5: SSHCP LAND COVER DETERMINATION

HABITAT VERIFICATION

The baseline mapping for the project's SSHCP land covers is illustrated in Plate IS-4. The baseline map shows that the overwhelming majority of the site is composed of Valley Grassland (7.02 acres; 98.27% of the site) and that the remaining 0.12 acres (1.73%) of the site is classified as High Density Development).

AES staff performed two pedestrian level surveys of the site, in November 2019 and February 2020. AES updated Plate IS-5 depicts the updated land cover mapping prepared by the applicant's consultant, AES. AES classified the entirety of the project site as "Disturbed" land cover. The SSHCP describes Disturbed land cover as:

> … areas that have been subject to previous or ongoing disturbances such as along roadsides, trails, and parking lots. Scraped or graded land, gravel mining, and waste disposal sites are included in this land cover type. Disturbed land cover type is vegetated with diverse weedy flora. These areas are of special concern as they tend to harbor and facilitate the spread of invasive plant species. Vascular plant species associated with the disturbed land cover typically include Johnson grass, Canadian horseweed (*Conyza canadensis*), milk thistle (*Silybum marianum*), yellow-star thistle (*Centaurea solstitialis*), stinkwort (*Dittrichia graveolens*) and field bindweed (*Convolvulus arvensis*).

AES' "Disturbed" classification is largely tied to the "dominance by invasive and other non-native species". AES's biological report noted that the majority of the species identified on the project site are non-native species, and the project site is actively managed for vegetation abatement. The report states that, "Using site-specific surveys and current CDFW vegetation categories (CDFW, 2019a), this site would likely be classified as a 'semi-natural alliance' dominated by non-native species, such as the 'wild oats and annual brome grasslands' semi-natural alliance." The report goes onto say, that the site is,

> dominated by non-native ruderal herbaceous plants including red-stemmed filaree (*Erodium cicutarium*), prickly lettuce (*Lactuca serriola*), field bindweed (*Convolvulus arvensis*), burclover (*Medicago polymorpha*), prickly sow thistle (*Sonchus asper*), prostrate knotweed (*Polygonum aviculare*), purple sand spurry (*Spergularia rubra*), and non-native annual grasses, including rattail sixweeks grass (*Festuca myuros*), rye grass (*Festuca perennis*), ripgut brome (*Bromus diandrus*), annual blue grass (*Poa annua*), hairy crabgrass (*Digitaria sanguinalis*), and orchard grass (*Dactylis glomerata*).

Many of the non-native plant species present are considered naturalized species and included in the SSHCP Valley Grassland land cover definition. The SSHCP describes Valley Grassland as:

> an annual herbaceous plant community now characterized mostly by naturalized annual grasses. Naturalized annual grasses that dominate the Plan Area's Valley Grassland land cover include wild oats (*Avena fatua*), soft chess (*Bromus*

hordeaceus), ripgut brome (*B. diandrus*), red brome (*B. madritensis ssp. rubens*), wild barley (*Hordeum spp.*), and foxtail fescue (*Vulpia myuros*). Common herbaceous forbs include the naturalized broadleaf filaree (*Erodium botrys*), redstem filaree (*E. cicutarium*), turkey mullein (*Eremocarpus setigerus*), true clovers (*Trifolium spp.*), and bur clover (*Medicago polymorpha*).

While portions of the site such as the compacted trails from human and vehicular traffic, areas with concrete pads from prior structures, and the encampment area at the southern portion of the site would likely be classified as Disturbed land cover, the majority of the project site is consistent with the baseline land cover of Valley Grassland. Table IS-11 shows a comparison of the baseline acreages and the acreages shown in Plate IS-5. The observed plant-species table included in the AES report lists, the presence of red-stemmed filafree, bur clover, ripgut brome, wild oats (*Avena fatua*), slender wild oat (*Avena barbata*), turkey mullein, rye grass, and clover (*Trifolium sp.*), which are indicative of the presence of Valley Grassland land cover onsite.

Table IS-12: Comparison of Baseline Mapping Land Cover Acreages and Determination Acreages

Cover Type	Baseline Area (Acres)	Determination (Acres)
Valley Grassland	7.02	6.23
High Density Development	0.12	0.00
Streams/Creek	0.00	0.03
Disturbed	0.00	0.86

CONCLUSION

Impacts with regards to consistency with the SSHCP are ***less than significant***. With participation in the SSHCP and compliance with its AMMs, impacts are considered ***less than significant***.

WETLANDS AND WATERS OF THE U.S.

Federal and state regulation (Clean Water Act Sections 404 and 401) uses the term "surface water" to refer to all standing or flowing water which is present aboveground either perennially or seasonally. There are many types of surface waters, but the two major groupings are linear waterways with a bed and bank (streams, rivers, etc.) and wetlands. The Clean Water Act has defined the term wetland to mean "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions". The term "wetlands" includes a diverse assortment of habitats such as perennial and seasonal freshwater

marshes, vernal pools, and wetted swales. The 1987 Army Corps Wetlands Delineation Manual is used to determine whether an area meets the technical criteria for a wetland and is therefore subject to local, State or Federal regulation of that habitat type. A delineation verification by the Army Corps will verify the size and condition of the wetlands and other waters in question, and will help determine the extent of government jurisdiction.

Wetlands are regulated by both the Federal and State government, pursuant to the Clean Water Act Section 404 (federal) and Section 401 (state). The United States Army Corps of Engineers (Army Corps) is generally the lead agency for the federal permit process, and the Regional Water Quality Control Board (Regional Water Board) is generally the lead agency for the state permit process. The Clean Water Act protects all "navigable waters", which are defined as traditional navigable waters that are or were used for commerce, or may be used for interstate commerce; tributaries of covered waters; and wetlands adjacent to covered waters, including tributaries.

In addition to the Clean Water Act, the state also has jurisdiction over impacts to surface waters through the Porter-Cologne Water Quality Control Act, which does not require that waters be "navigable". For this reason, Federal non-jurisdictional waters – isolated wetlands – can be regulated by the State of California pursuant to Porter-Cologne.

The Clean Water Act establishes a "no net" loss" policy regarding wetlands for the state and federal governments, and General Plan Policy CO-58 establishes a "no net loss" policy for Sacramento County. Mitigation requirements consistent with the SSHCP are in compliance with these policies.

The SSHCP implements a CWA Section 404 permit strategy (SPK-1995-00386) for SSHCP covered activity projects that would discharge fill material into wetlands and other waters of the United States. The multi-tiered CWA 404 permit strategy draws upon the content of the SSHCP, the Aquatic Resources Program (ARP), and aquatic resource protection ordinances. The ARP is a local jurisdiction based aquatic resources permit program that adds to the strength of the SSHCP framework of protection of natural communities and native plant and wildlife species, including protection of aquatic resources. A primary goal of ARP implementation is to achieve an overall no net loss of aquatic resources functions and services. While the ARP focuses on a permit program to address impacts to aquatic resources and the SSHCP focuses on permitting related to incidental take of species, both permitting processes are done in conjunction with one another and consist of:

- A programmatic general permit (PGP) founded on a local aquatic resources protection program and designed to reduce duplication with that program, for covered activities with minimal individual and cumulative effects on aquatic resources. The PGP is implemented by the three land-use authority Permit Applicants (i.e., Sacramento County, Galt, and Rancho Cordova).

- A regional general permit (RGP), for covered activities with minimal individual and cumulative effects on aquatic resources that do not qualify for the PGP.

- A procedure for issuing Letters of Permission (LOP procedure) for covered activities with more than minimal effects, but less-than-significant effects, on the human environment, including aquatic resources.

- An abbreviated process for issuing standard permits (abbreviated SP) for other covered activity impacts that do not qualify for the PGP or the LOP procedure. The abbreviated SP process is used for the small number of SSHCP covered activities requiring authorization under CWA 404 that may significantly affect the human environment under NEPA, requiring the preparation of an EIS.

The CWA 404 permit strategy relies, at all levels of permitting, on the SSHCP to address avoidance, minimization and requirements for compensatory mitigation for impacts to aquatic resources. Key to satisfying compensatory mitigation requirements, payment of SSHCP-required fees dually fulfills a Corps-approved South Sacramento In Lieu Fee Program established by the SSHCP Permittees, which relies on the compensatory mitigation ratio requirements for aquatic resources contained in the SSHCP (vs. project-by-project compensatory mitigation evaluation).

Section 13260(a) of the California Water Code (Water Code) requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, which could affect the quality of the waters of the State, file a report of waste discharge (ROWD). The discharge of dredged or fill material may constitute a discharge of waste that could affect the quality of waters of the State.

California has largely relied upon its authority under section 401 of the federal CWA to regulate discharges of dredged or fill material to California waters. That section requires an applicant to obtain “water quality certification” from California that the project will comply with state water quality standards before certain federal licenses or permits may be issued. The permits subject to section 401 include permits for the discharge of dredged or fill materials (CWA section 404 permits) issued by the U.S. Army Corps of Engineers (ACOE).

Given the regulatory process employed under section 401, waste discharge requirements under the Porter-Cologne Water Quality Control Act were typically waived for projects that required certification. Regional Water Quality Control Board (RWQCB) waivers also applied to discharges outside of ACOE jurisdiction. However, these waivers expired as of January 1, 2003 pursuant to the requirements of SB 390. These General Waste Discharge Requirements (WDRs) regulate some of the activities for which WDRs were previously waived.

The certification process under section 401 only applies to those waters that are subject to the reach of the CWA. The CWA applies to “navigable waters,” which are defined in the CWA as waters of the US.

DISCUSSION OF PROJECT IMPACTS

No wetlands were identified on site.

AES staff performed surveys for aquatic resources in November 2019 and February 2020. AES surveyed the sites using the Army Corps' 1987 Wetland Delineation Manual and the Arid West Regional Supplement. The surveys identified one aquatic feature, a 300-foot long, man-made ditch located near the northern property boundary. The feature transverses the site from east to west, but no longer has any hydrological connections up or downstream. Surveys did not find any positive indicators for any of the three parameters (vegetation, soils, and hydrology) needed to classify a feature as a wetland and therefore, is unlikely to be classified as waters of the U.S; however, the feature may still be classified as waters of the State of California and would be classified as a stream/creek feature under the SSHCP. If the RWQCB determines the feature constitutes waters of the State, the applicant will need to submit a Report of Waste Discharge, for the filling of the stream feature, to the RWQCB. This submission will serve as an application for WDRs. A signed Notice of Applicability for coverage under General WDRs would be needed prior to authorization under the SSHCP being granted. Additionally, since the project would result in the permanent filling of the 0.03-acre feature it would require compensation through payment of SSHCP Development Fees for Stream/Creek land cover type.

CONCLUSION

Participation in the SSHCP and compliance with the AMMs will ensure impacts are ***less than significant***.

NATIVE TREES

Sacramento County has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12 of the County Code) provides protections for landmark trees and heritage trees. The County Code defines a landmark tree as "an especially prominent or stately tree on any land in Sacramento County, including privately owned land" and a heritage tree as "native oak trees that are at or over 19" diameter at breast height (dbh)." Chapter 19.12 of the County Code, titled Tree Preservation and Protection, defines native oak trees as valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*) and states that "it shall be the policy of the County to preserve all trees possible through its development review process." It should be noted that to be considered a tree, as opposed to a seedling or sapling, the tree must have a diameter at breast height (dbh) of at least 6 inches or, if it has multiple trunks of less than 6 inches each, a combined dbh of 10 inches. The Sacramento County General Plan Conservation Element policies CO-138 and CO-139 also provide protections for native trees:

CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson's hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.

CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting

specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

Native trees other than oaks include Fremont cottonwood (Populus fremontii), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*, which is also a List 1B plant), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis),* gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

DISCUSSION OF PROJECT IMPACTS

AES prepared an arborist report that is included as Attachment C of the Biological Resources Assessment (Appendix B). The arborist report identified three native oaks on the project site. The three valley oaks are located along the eastern property boundary line. All three trees are located under SMUD power lines. The arborist report noted that the trees were in "poor-fair" health as their canopies have all been topped and heavily pruned to prevent the trees from impacting the overhead SMUD facilities. The arborist report recommended that all three trees be removed to prevent them from impacting power lines and potentially falling over in the future. Since the trees are in poor health, replacement plantings will not be required.

CONCLUSION

Impacts to native trees are considered ***less than significant***.

SPECIAL STATUS SPECIES

The likelihood of a special status species to be present on the project site was determined using the technical studies/documents listed above, and topical literature as cited. Species considered for presence are those species with modeled habitat identified in the SSHCP and species considered with potential occurrence as indicated on the official USFWS species list, CNDDB quad queries (Florin & Elk Grove US Geological Survey 7.5-minute quadrangles), CNPS queries. This is the basis for species outlined in Table IS-13 and Table IS-14, which report the likelihood of species occurrence based on habitat presence either on the site or in proximity of the site, survey results (if any), and nearby recorded species occurrences. Likelihood of occurrence is rated as Not Expected to Occur, Could Occur, and Known to Occur, which are defined as:

Not Expected to Occur: Species is unlikely to be present on the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

Could Occur: Suitable habitat is available on the project site; however, there are little to no other indicators that the species might be present.

Known to Occur: The species, or evidence of its presence, was observed on the project site during project surveys, or was otherwise documented.

Species with a Not Expected to Occur designation are not discussed further in subsequent analysis sections.

Special-Status Plants

Table IS-13 provides a list of the special-status plant species with potential to occur based upon the available data from USFWS' IPaC, CNNDB, CNPS, and species covered by the SSHCP. The table describes their regulatory status, habitat, and potential for occurrence on the project site. Rationale for potential for occurrence was taken from the project's biological report prepared by AES.

Table IS-13: Special-Status Plant Species and Potential for Occurrence

Species	Status [1]				Habitat and Blooming Period	Potential for Occurrence[2]
	USFWS	CDFW	CRPR	SSHCP		
Alkali-sink goldfields *Lasthenia chrysantha*	–	–	1B.1	No	Foothill grassland (mesic, alkaline), and vernal pools. Elevations range from 0-985 feet. Blooms from February- April (Jepson Flora Project – U.C. Berkeley, 2020).	Not expected to occur. Suitable habitat is not present. The closest occurrence is located over 8 miles southwest of the project site. Species was not present during February 2020 survey.
Dwarf downingia *Downingia pusilla*	–	–	2B.2	Yes	An annual herb found in mesic valley and foothill grassland and vernal pools from 3 to 1,500 feet elevation. Blooms March - May (CNPS 2020).	Not expected to occur. No habitat present. There are multiple occurences within the CNDDB search area; however, the closest occurrence is located approximately 6.73 miles to the southwest.
Heckard's pepper grass *Lepidium latipes var. heckardii*	–	–	1B.2	No	Valley and foothill grasslands (alkaline flats) from 0-655 feet elevation. Blooms March – May (CNPS 2020).	Not expected to occur. No known occurrences within five miles of the project site.
Legenere *Legenere limosa*	–	–	1B.1	Yes	Relatively deep and wet vernal pools below 3,000 feet elevation. Blooms April – June (CNPS 2020).	Not expected to occur. No habitat present. Five known occurrences are located within the search area; the nearest occurs is approximately 4 miles south of the project area.
Peruvian dodder *Cuscuta obtusiflora var. glandulosa*	–	–	2B.2	No	Marshes and swamps (fresh water) from 0-920 feet elevation. Blooms July-October (CNPS 2020).	Not expected to occur. No suitable habitat present. One known occurrence is located approximately 6.29 miles southwest along the margin of large pond.
Saline clover *Trifolium hydrophilum*	–	–	1B.2	No	Shallow marsh, vernal pools, alkaline flats; 0-985 feet. Blooms April – June (CNPS 2019)	Not expected to occur. No habitat present on-site. There are no known occurrences within five miles of the project site.
Sanford's arrowhead *Sagittaria sanfordii*	–	–	1B.2	Yes	Shallow freshwater marshes, swamps, drainage channels; below 2,200 feet elevation. Blooms May–October (CNPS 2020).	Could occur. The drainage channel on the northern property line provides marginal habitat. Nearest known occurrence located 0.40 miles to the south within the concrete-lined Morrison Creek channel.
Wooly rose-mallow *Hibiscus lasiocarpos*	–	–	1B.2	No	Found in freshwater marshes and swamps. Often found in riprap on the sides of levees. 0-395 feet elevation. Blooms June-September (CNPS 2020).	Not expected to occur. No suitable habitat present onsite. No known occurrences within five miles of the project site.

Notes: USFWS = U.S. Fish and Wildlife Service; CDFW = California Department of Fish and Wildlife; CRPR = California Rare Plant Rank; CNDDB = California Natural Diversity Database; ESA = Federal Endangered Species Act; CESA = California Endangered Species Act

[1] Legal Status Definitions

U.S. Fish and Wildlife Service: E Endangered (legally protected) T Threatened (legally protected) California Department of Fish and Game: E Endangered (legally protected)	California Rare Plant Ranks: 1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA) 2 Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA) CRPR Extensions: .1 Seriously endangered in California (>80% of occurrences are threatened and/or high degree and immediacy of threat) .2 Fairly endangered in California (20 to 80% of occurrences are threatened)

Sanford's arrowhead is the only plant species with a potential to occur onsite.

Sanford's Arrowhead

Sanford's arrowhead (*Sagittaria sanfordii)* occurs in emergent marsh habitats, including habitats which are modified or human-made. Sanford's arrowhead is designated as a federal species of special concern and is listed by the California Native Plant Society's Inventory of Rare and Endangered Plants as category 1B.2 (i.e. rare throughout its range in California with a moderate probability of going extinct). Sanford's is fairly common in the Sacramento area. Potential suitable marsh habitats include the margins of rivers, streams, ponds, reservoirs, irrigation and drainage canals and ditches, and stock-ponds. In order to avoid impacts to the species, appropriate habitat must be avoided or a survey must be performed demonstrating that the species is not present.

DISCUSSION OF PROJECT IMPACTS

The man-made ditch located at the northern portion of the property provides marginal habitat for the species. While the plant was not seen during floristic surveys, both surveys were conducted outside of the evident and identifiable bloom period. The nearest CNDDB occurrence, is located within a concrete-channelized section of Morrison Creek, approximately 0.40 miles south of the site.

CONCLUSION

With participation in the SSHCP and compliance with the AMMs impacts to rare plant species are considered ***less than significant***.

Special Status Wildlife Species

Table IS-14 provides a list of the special-status wildlife species with potential to occur based upon the available data from USFWS' IPaC, CNNDB, AES' biological report, and species covered by the SSHCP. The table describes their regulatory status, habitat, and potential for occurrence on the project site.

Table IS-14: Special-Status Wildlife and Potential for Occurrence

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
Invertebrates					
California linderiella *Linderiella occidentalis*	–	–	No	Inhabit shallow vernal pools and other seasonal wetlands.	Not expected to occur. The site does not contain suitable habitat for the species. There are 23 CNDDB occurrences within the search area, with the nearest occurrences located approximately 1.08 miles southwest. The feature occurrence was recorded in 1992.
Midvalley fairy shrimp *Branchinecta mesovallensis*	–	–	Yes	Inhabit shallow vernal pools, vernal swales, and various artificial ephemeral wetland habitats in the Sacramento (SSHCP 2018).	Not expected to occur. The site does not contain suitable habitat for the species. There are 6 CNDDB occurrences within the search area, with the nearest occurrence located 4.20 miles to the southeast.
Vernal pool fairy shrimp *Branchinecta lynchi*	T	–	Yes	Vernal pools and other seasonal wetlands in valley and foothill grasslands. Tends to occur in smaller wetland features (less than 0.05 acre in size) (USFWS 1994).	Not expected to occur. The site does not contain suitable habitat for the species. There are 15 occurrences within the search area, with the nearest occurrence located approximately 1.18 miles southwest.
Vernal pool tadpole shrimp *Lepidurus packardi*	E	–	Yes	Vernal pools and other seasonal wetlands in valley and foothill grasslands that pond for sufficient duration to allow the species to complete its life cycle. Typically found in ponds ranging from 0.1 to 80 acres in size (USFWS 1994).	Not expected to occur. The site does not contain suitable habitat for the species. There are 18 occurrences within the search area, within the search area, with the nearest occurrences located approximately 1.18 miles southwest.
Amphibians and Reptiles					
Giant garter snake *Thamnophis gigas*	T	T	Yes	Slow-moving streams, sloughs, ponds, marshes, inundated floodplains, rice fields, and irrigation/drainage ditches on the Central Valley floor with mud bottoms, earthen banks, emergent vegetation, abundant small aquatic prey and absence or low numbers of large predatory fish. Also require upland refugia not subject to flooding during the snake's inactive season.	Not expected to occur. No suitable habitat on-site. Although the site has a drainage channel on-site, it is isolated and is not close to other drainage features.
Western pond turtle *Emys marmorata*	–	SC	Yes	Forage in ponds, marshes, slow-moving streams, sloughs, and irrigation/drainage ditches; nest in nearby uplands with low, sparse vegetation.	Not expected to occur. No suitable habitat on-site. There are five known occurrences within the search area; the closest known occurrence located are approximately 3.55 mile south of the project site.
Western spadefoot *Spea hammondii*	–	SC	Yes	Vernal pools and other seasonal ponds with a minimum three-week inundation period in valley and adjacent foothill grasslands.	Not expected to occur. Suitable habitat not present on-site. There are no known CNDDB records within the search area.
Birds					

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
Burrowing owl *Athene cunicularia* (burrow sites)	–	SC	Yes	Nests and forages in grasslands, agricultural lands, open shrublands, and open woodlands with existing ground squirrel burrows or friable soils. Suitable burrow sites consist of short, herbaceous vegetation with only sparse cover of shrubs or taller herbs (Shuford and Gardali 2008: 221).	Could occur. The valley grasslands on-site provide suitable habitat for the species. Ground-mammal burrow were present on-site, the species was not observed. There are 18 CNDDB records within the search area. The nearest occurrence, from 2006, is approximately 0.95 miles southwest of the site. Further discussion below.
Cooper's hawk *Accipiter cooperi*	–	–	Yes	Nests in a wide variety of woodland and forest habitats. Dense stands of live oak, deciduous riparian, or other forest habitats near water are preferred. Nests are placed in deciduous trees in crotches 10-80 ft above the ground (CWHR 2019).	Not expected to occur. Unlikely that nesting would occur nearby since there are no live oak, deciduous, riparian, or other forest habitats near water anywhere close to the project site. There are three recorded occurrences. The nearest occurrence was recorded 4.4 miles south of the project site.
Ferruginous hawk *Buteo regalis*	–	–	Yes	Forages in large, open tracts of grasslands, sparse scrubland, and deserts. It frequents open grasslands, sagebrush flats, desert scrub, low foothills and surrounding valleys, and fringes of pinyon-juniper habitats. Nesting occurs in lone trees or on telephone poles; species is not known to breed in California (CWHR 2019).	Could occur. The site's valley grassland suitable foraging habitat. There are two CNDDB records in the search area; the closest record, from 2003, is located approximately 3.63 miles southwest of the site. Further discussion below.
Loggerhead shrike *Lanius ludovicianus*	–	SC	Yes	Nests in a densely-foliaged shrub or tree. Prefers open grasslands or scrub with shrubs or trees and low, sparse herbaceous cover with perches available (fences, posts, utility lines). In California, the critical nesting season in is from March into August (CHWR 2019).	Could occur. The valley grassland provides suitable foraging habitat and marginal nesting habitat. There are no known CNDDB records of loggerhead shrike in Sacramento County; however, this species is frequently observed in open grasslands in the Central Valley, including portions of Sacramento County as indicated by eBird (2020) observations. Further discussion below.
Northern harrier *Circus cyaneus*	–	SC	Yes	Breed and forage in a variety of open (treeless) habitats that provide adequate vegetative cover, an abundance of suitable prey, and scattered hunting, plucking, and lookout perches such as shrubs and fence posts. Habitats include freshwater marshes, brackish and saltwater marshes, wet meadows, weedy borders of lakes, rivers and streams, annual and perennial grasslands, vernal pool complexes, weed fields, ungrazed or lightly grazed pastures, low-	Not expected to occur. The valley grassland provides suitable foraging habitat; however, the site is located in an urban area and lacks the aquatic habitat that the species prefers. There are no known CNDDB records of northern harrier in the search area or in Sacramento County; however, this species is frequently observed throughout Sacramento County as indicated by eBird (2020) observations.

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
				growing crop fields, sagebrush flats, and desert sinks (Shuford and Gardali 2008).	
Purple martin *Progne subis*	–	SC	No	Inhabits open forests, woodlands, and riparian areas in breeding season. Found in a variety of open habitats during migration, including grassland, wet meadow, and fresh emergent wetland, usually near water. Nests in conifer stands, often in woodpecker holes. Uses valley foothill and montane hardwood and conifer, and riparian habitats.	Not expected to occur. No suitable habitat present. Nearest known occurrence is located 2.98 miles northwest of the site.
Song sparrow (Modesto population) *Melospiza melodia*	–	–	No	Found in riparian or herbaceous wetland habitat among brushy, shrubby areas of grass along water courses and marshes. Nests on the ground among clumps of dead grass or in small conifers and other shrubs.	Not expected to occur. No suitable habitat present on-site. There are four known occurrences within the search area, the nearest occurrence was recorded in 1900 and is located northwest of the site. The more recent occurrences were recorded in 2009. They are located along the Sacramento River, approximately 4.93 miles southwest of the site.
Swainson's hawk *Buteo swainsoni*	–	T	Yes	Forages in grasslands and agricultural lands; nests in riparian and isolated trees.	Could occur. There are 47 CNDDB occurrences within the search area. Closest occurrence, from 2015, is located approximately 1.54 miles southeast of the project site. The trees along the eastern property line provide suitable nesting habitat. Additionally, the valley grasslands on site provide suitable foraging habitat. Further discussion below.
Tricolored blackbird *Agelaius tricolor* (nesting colony)	–	E	Yes	Forages in agricultural lands and grasslands; nests in marshes, riparian scrub, and other areas that support cattails or dense thickets of shrubs or herbs. Requires open water and protected nesting substrate, such as flooded, spiny, or thorny vegetation (Schuford and Gardali 2008: 439).	Not expected to occur. The site does not contain any potential nesting or foraging habitat. There are 8 CNDDB records in the search area. The closest record is located approximately 4.03 miles southeast of the site—colony is considered possibly extirpated.
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	T	E	No	Prefer isolated wooded riparian corridors surrounded by extensive arid uplands. Known breeding populations in California, exist along the Sacramento River and Feather River (Dettling MD, Seavy NE, Howell CA, Gardali T 2015).	Not expected to occur. The site does not contain suitable habitat. The one record within the search area was recorded in 1877. This occurrence has a 5-mile radius and is located northwest of the site.
White-tailed kite *Elanus leucurus*	–	FP	Yes	White-tailed kites occur in herbaceous and open stages of most habitats in cismontane California. Areas with substantial groves of dense, broad-leafed deciduous trees are used for nesting and roosting. Nests are typically located from 20 to 100 feet above	Could occur. The site contains marginal foraging habitat for the species. There are two known CNDDB records within the search area, with the closest record, from 1990, located 2.54 miles south of the site. Further discussion below.

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
				the ground near the top of dense oak, willow, or other tree stands, and are often located near an open foraging area with a dense population of voles (CWHR 2019).	
Yellow-headed blackbird *Xanthocephalus xanthocephalus*	–	–	No	Breeds in prairie wetlands and along other western lakes and marshes where tall reeds and rushes are present. Forages in the wetlands and in surrounding grasslands and croplands. In winter large flocks forage in agricultural areas.	Not expected to occur. No habitat present. There is one recorded occurrence within the search area; it is located approximately 4.22 miles southwest of the project site, along the Sacramento River.
		Mammals			
American badger *Taxidea taxus*	–	SC	Yes	Suitable habitat occurs in the drier open stages of most shrub, forest, and herbaceous habitats with friable soils. Badgers are generally associated with treeless regions, prairies, parklands, and cold desert areas.	Not expected to occur. Suitable habitat nor present on-site. There are two known CNDDB records with the search area, with the nearest occurrence located approximately 2.04 miles northeast of the site.
Pallid bat *Antrozous pallidus*	–	SC	No	Grasslands, agricultural fields, and desert habitat. Roosts in rock crevices, caves, mine shafts, under bridges, in buildings and tree hollows. Some hibernate; many remain active all year in low to mid-elevations.	Could occur. Suitable foraging habitat and marginal roosting habitat present on-site. No CNDDB occurrences within search area. Further discussion below.
Western red bat *Lasiurus blossevillii*	–	SC	Yes	This species roost primarily in trees along edge habitats adjacent to streams, fields, or urban areas. The species can be found within either natural or human-made structures, such as caves, mines, crevices (including under bridges), hollow trees, and in abandoned or seldom-used buildings. Young are born to the species in the spring and early summer (maternity colonies typically begin to form in April, and births occur from May through early July).	Could occur. Suitable foraging habitat and marginal roosting habitat present. There are no known occurrences of western red bat within five miles of the project area. Further discussion of the species can be found below.
Yuma myotis *Myotis yumanensis*	–	–	No	Found in open forests and woodlands usually feeding over water. Emerges soon after sunset and feeds on a variety of flying insects low to the ground. Roosts in buildings, bridges, mines, caves, or crevices (CDFW 2020).	Not expected to occurr. Site lacks woodland habitat. No known occurrences within five miles of the site. Further discussion below.

Note: CNDDB = California Natural Diversity Database; USFWS = U.S. Fish and Wildlife Service

[1] Legal Status Definitions

Federal:
- E Endangered (legally protected)
- T Threatened (legally protected)
- D Delisted

State:
- D Delisted
- FP Fully protected (legally protected)
- SC Species of special concern (no formal protection other than CEQA consideration)
- E Endangered (legally protected)
- T Threatened (legally protected)

[2] Potential for Occurrence Definitions

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		

Not expected to occur: Species is unlikely to be present on the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

Could occur: Suitable habitat is available on the project site; however, there are little to no other indicators that the species might be present.

Known to occur: The species, or evidence of its presence, was observed on the project site during project surveys, or was otherwise documented.

Source: AES 2020, CDFW 2020, CNDDB 2020, USFWS 2020

As noted in Table IS-14, several special-status species and SSHCP cover species have the potential to occur in the project site. Species not expected to occur will not be discussed further. Species with potential to occur are discussed below.

Burrowing Owl

According to the CDFW life history account for the species, burrowing owl (*Athene cunicularia*) habitat can be found in annual and perennial grasslands, deserts, and arid scrublands characterized by low-growing vegetation. Burrows are the essential component of burrowing owl habitat. Both natural and artificial burrows provide protection, shelter, and nesting sites for burrowing owls. Burrowing owls typically use burrows made by fossorial mammals, such as ground squirrels or badgers, but also use human-made structures such as cement culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement. Burrowing owls are listed as a California Species of Special Concern due to loss of breeding habitat.

Burrowing owls may use a site for breeding, wintering, foraging, and/or migration stopovers. Nesting season is generally defined as February 1 – September 15. Occupancy of suitable burrowing owl habitat can be verified at a site by detecting a burrowing owl, its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance. Burrowing owls exhibit high site fidelity, reusing burrows year after year.

According to the CDFW "Staff Report on Burrowing Owl Mitigation" (March 2012), surveys for burrowing owl should be conducted whenever suitable habitat is present within 500 feet of a proposed impact area; this is also consistent with the "Burrowing Owl Survey Protocol and Mitigation Guidelines" published by The California Burrowing Owl Consortium (April 1993). Occupancy of burrowing owl habitat is confirmed whenever one burrowing owl or burrowing owl sign has been observed at a burrow within the last three years.

The CDFW Staff Report on Burrowing Owl Mitigation indicates that the impact assessment should address the factors which could impact owls, the type and duration of disturbance, the timing and duration of the impact, and the significance of the impacts. The assessment should also take into account existing conditions, such as the visibility and likely sensitivity of the owls in question with respect to the disturbance area and any other environmental factors which may influence the degree to which an owl may be impacted (e.g. the availability of suitable habitat).

DISCUSSION OF PROJECT IMPACTS

The proposed staging areas contain valley grasslands, which provide suitable habitat for burrowing owl. Participation in the SSHCP and compliance with the AMMs, including preconstruction surveys for burrowing owl, will ensure take of the species does not occur.

CONCLUSION

With participation in the SSHCP and compliance with AMMs, impacts to burrowing owls are considered ***less than significant***.

FERRUGINOUS HAWK

This species forages in large, open tracts of grasslands, sparse scrubland, and deserts. It frequents open grasslands, sagebrush flats, desert scrub, low foothills and surrounding valleys, and fringes of pinyon-juniper habitats. Nesting occurs in lone trees or on telephone poles. Prey includes lagomorphs, ground squirrels, and mice, although it will also take birds, reptiles, and amphibians. This species is not known to breed in California; however, the species may forage within habitat on-site.

DISCUSSION OF PROJECT IMPACTS

The site's valley grassland provide suitable foraging habitat and nesting habitat. There are two CNDDB records in the search area. The closest record, from 2003, is located approximately 3.63 miles southwest of the site.

Potential nesting habitat is provided by trees on-site and the surrounding properties to the south. Development of the parcel would result in a loss of foraging habitat (valley grassland) and potential nesting habitat.

CONCLUSION

With participation in the SSHCP and compliance with the AMMs for raptors, impacts to ferruginous hawk are considered ***less than significant***.

LOGGERHEAD SHRIKE

According to the California Fish and Wildlife Life History Account for the loggerhead shrike (*Lanius ludovicianus*), the species breeds mainly in shrublands or open woodlands with a fair amount of grass cover and areas of bare ground. They require tall shrubs or trees (they also use fences or power lines) for hunting perches, territorial advertisement, and pair maintenance; open areas of short grasses, forbs, or bare ground for hunting; and large shrubs or trees for nest placement. They also need impaling sites for prey manipulation or storage, which can include sharp, thorny, or multistemmed plants and barbed-wire fences. The breeding season for this species begins in mid-March to early April and extends to July. The species is listed as a California Species of Special Concern due to loss of nesting habitat.

DISCUSSION OF PROJECT IMPACTS

The valley grassland provides suitable foraging habitat and potential nesting habitat along the southern property boundaries. There are no known CNDDB records of loggerhead shrike in Sacramento County; however, this species is frequently observed in open grasslands in the Central Valley, including portions of Sacramento County as indicated by eBird (2020) observations.

Development of the site would result in potential nesting and foraging habitat for the species. Compliance with the SSHCP AMMs for raptors will be required. Although the species is not a raptor, it is grouped in with the raptor AMMs because of its use of impaling sites.

CONCLUSION

With participation in the SSHCP and compliance with the AMMs for raptors, impacts to the species are considered ***less than significant***.

SWAINSON'S HAWK

The Swainson's hawk (*Buteo swainsoni*) is listed as a threatened species by the State and is a covered species under the SSHCP. It is a migratory raptor typically nesting in or near valley floor riparian habitats during spring and summer months. Swainson's hawks were once common throughout the state, but various habitat changes, including the loss of nesting habitat (trees) and the loss of foraging habitat through the conversion of native Central Valley grasslands to certain incompatible agricultural and urban uses has caused an estimated 90% decline in their population.

DISCUSSION OF PROJECT IMPACTS

There are 47 CNDDB occurrences within the search area. Closest occurrence, from 2015, is located approximately 1.54 miles southeast of the project site. The trees along the eastern property line provide suitable nesting habitat.

Suitable habitat is present for nesting and foraging on and near the project site. Construction activities associated with the proposed project would result in the loss of potential foraging habitat. In order to avoid potential impacts to the species, compliance with the SSHCP AMMs for Swainson's hawk will be required.

CONCLUSION

With participation in the SSHCP and compliance with the AMMs for raptors, impacts to the species are considered ***less than significant***.

WHITE-TAILED KITE

White-tailed kite is a CDFW fully protected species. White-tailed kites occur in herbaceous and open stages of most habitats in cismontane California. Areas with substantial groves of dense, broad-leafed deciduous trees are used for nesting and roosting. They also roost in saltgrass and Bermuda grass in southern California. White-tailed kite breeds from February to October, with peak activity from May to August. Nests are typically located from 20 to 100 feet above the ground near the top of dense

oak, willow, or other tree stands, and are often located near an open foraging area with a dense population of voles (CWHR 2019).

DISCUSSION OF PROJECT IMPACTS

Large trees onsite could potentially provide nesting habitat. There are two known CNDDB records within the search area. The closest record, from 1990, located 1.50 miles northeast of the project site. The valley grasslands on-site provide potential foraging habitat.

Development of the site will result in a loss of potential nesting and foraging habitat for the species. Compliance with the SSHCP AMMs for raptors will be required.

CONCLUSION

With participation in the SSHCP and compliance with the AMMs for raptors, impacts to the species are considered ***less than significant***.

Pallid Bat & Western Red Bat

Pallid bat (*Antrozous pallidus*) is a state-listed Species of Special Concern. This species can is commonly found in grasslands, agricultural fields, and desert habitat. The species can be found roosting within natural or man-made structures, such as rock crevices, caves, mine shafts, under bridges, in buildings and tree hollows.

Western red bat (*Lasiurus blossevillii*) is a state-listed Species of Special Concern. This species roost primarily in trees along edge habitats adjacent to streams, fields, or urban areas. The species can be found within either natural or human-made structures, such as caves, mines, crevices (including under bridges), hollow trees, and in abandoned or seldom-used buildings. Young are born to the species in the spring and early summer (maternity colonies typically begin to form in April, and births occur from May through early July). Threats to the species include loss of foraging and roosting habitat, and disruption of maternity colonies.

DISCUSSION OF PROJECT IMPACTS

There are no known occurrences of the three bat species within five miles of the project area; however, suitable foraging habitat is present in and adjacent to the area. Culverts running under SR99, in trees, or other structures around the site. Proposed tree and vegetation removal could impact roosting bats. Western red bat is the only covered bat species within the SSHCP; however, compliance with the AMMs of the SSHCP would ensure impacts to the other two bat species are less than significant.

CONCLUSION

With participation in the SSHCP and compliance with its AMMs, impacts to pallid bats andwestern red batsare considered ***less than significant***.

Migratory Nesting Birds

The Migratory Bird Treaty Act of 1918, which states “unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue,

hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(18) of FESA defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take." To avoid take of nesting migratory birds, minimization measures have been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded.

DISCUSSION OF PROJECT IMPACTS

Suitable tree habitat is present throughout the project site and adjacent properties. Preconstruction surveys for migratory nesting birds will be required if work is to commence between February 1 and September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting migratory birds, potentially resulting in nest abandonment or other harm to nesting success.

CONCLUSION

Impacts to migratory nesting birds are ***less than significant***.

CULTURAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Cause a substantial adverse change in the significance of a historical resource
- Have a substantial adverse effect on an archaeological resource
- Disturb any human remains, including those interred outside of formal cemeteries

Under CEQA, lead agencies must consider the effects of projects on historical resources and archaeological resources. A "historical resource" is defined as a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant (Section 15064.5[a] of the Guidelines). Public Resources Code (PRC) Section 5042.1 requires that any properties that can be expected to be directly or indirectly affected by a proposed project be evaluated for CRHR eligibility. Impacts to historical resources that materially impair those characteristics that convey its historical significance and justify its inclusion or eligibility for the NRHP or CRHR are considered a significant effect on the environment (CEQA guidelines 15064.5)).

In addition to historically significant resources, an archeological site may meet the definition of a "unique archeological resource" as defined in PRC Section 21083.2(g). If

unique archaeological resources cannot be preserved in place or left in an undisturbed state, mitigation measures shall be required (PRC Section 21083.2 (c)).

CEQA Guidelines Section 15064.5 (e) outlines the steps the lead agency shall take in the event of an accidental discovery of human remains in any location other than a dedicated cemetery.

Cultural Setting

AES also prepared a cultural resources report for the project. The findings of the report were utilized in the analysis below.

A search of records and historical information on file at the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) was conducted on December 3, 2019. A 0.5-mile search radius was used.

The records search found five archaeological surveys were conducted within 0.5 miles of the project site, none of them overlapped the project site. The records search did not identify any known cultural resources within 0.5 miles.

Discussion of Project Impacts

AES conducted a pedestrian-level survey at 15 meter transects on December 4, 2019. The survey did not detect any historic or archeological resources. There are no known cultural resources on the project site.

Project activities are limited to the project site. All five historic resources mentioned in the NCIC records search are located offsite and would be avoided; therefore, the project does not have the potential to impact these resources.

The project is unlikely to impact human remains buried outside of formal cemeteries; however, if human remains are encountered during construction, mitigation is included specifying how to comply with CEQA Guidelines Section 15064.5 (e), Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code.

Conclusion

Impacts to cultural resources are considered ***less than significant***.

Tribal Cultural Resources

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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 a cultural value to a

California Native American tribe, 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 Public Resources Code 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 Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Under PRC Section 21084.3, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources (TCRs; 21080.3.1(a)).

Tribal Cultural Resource Setting

AES submitted a Sacred Lands File Search (SLFS) request to the Native American Heritage Commission (NAHC) on November 20, 2019. On November 25, 2019, the NAHC responded that there was a negative SLFS for the project site.

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects on July 7, 2020. Responses were received from the United Auburn Indian Community (UAIC) and Wilton Rancheria (Wilton).

Discussion of Project Impacts

UAIC stated that they were not aware of any TCRs on or near the project site, and requested that unanticipated discovery mitigation be incorporated into the project. No further consultation was requested.

Wilton requested consultation under AB-52 on July 29, 2020, via email. Wilton is not aware of any TCRs on the project site, but did disclose that the project site is located near a known site of cultural significance. In order to avoid construction-related impacts to potential unknown tribal cultural resources, they have requested that unanticipated discovery mitigation be incorporated. In the event that cultural resources are discovered during construction, both Wilton and UAIC will be contacted.

Conclusion

With the recommended mitigation, impacts to TCRs will be ***less than significant***.

Hazards and Hazardous Materials

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials

In 2012, SHRA hired Geocon Consultants, Inc. (Geocon) to prepare a Phase I Environmental Site Assessment (ESA) for the property. Geocon prepared a report (dated January 2, 2013) detailing their findings (Appendix E). The discussion below summarizes their efforts and findings.

Methodology

Geocon researched a variety of federal, state, tribal, and local databases and directories to determine if any recognized environmental conditions (RECs) had been recorded on or near the project site. Additionally, Geocon staff conducted a pedestrian-level survey of the site on December 18, 2012.

Discussion of Project Impacts

Geocon's research not identify any known RECs on the project site. Similarly, the pedestrian survey did not identify any evidence of hazardous materials on the site. The research returned several RECs within a ¼-mile of the site. All records could be attributed to inactive facilities that previously handled hazardous materials, but Geocon concluded that the chance of impact to the site from these facilities were low, mostly due to lack of reported releases or violations from the facilities.

The State Water Resource's Control Board's GeoTracker and the California Environmental Protection Agency, Department of Toxic Substances Control's Envirostor databases did not contain any records on or within ¼-mile of the site. The report did not identify any evidence of RECs on the site nor the adjoining properties.

Conclusion

Impacts related to hazardous materials are considered ***less than significant***.

Greenhouse Gas Emissions

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Regulatory Setting

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this establishes a broad framework for the State's long-term GHG reduction and climate change adaptation program. Of particular importance is AB 32, which establishes a statewide goal to reduce GHG emissions back to 1990 levels by 2020, and Senate Bill (SB) 375 supports AB 32 through coordinated transportation and land use planning with the goal of more

sustainable communities. SB 32 extends the State's GHG policies and establishes a near-term GHG reduction goal of 40% below 1990 emissions levels by 2030. Executive Order (EO) S-03-05 identifies a longer-term goal for 2050.[2]

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

In October of 2011, Sacramento County approved the Climate Action Plan Strategy and Framework document (CAP), which is the first phase of developing a community-level Climate Action Plan. The CAP provides a framework and overall policy strategy for reducing greenhouse gas emissions and managing our resources in order to comply with AB 32. It also highlights actions already taken to become more efficient, and targets future mitigation and adaptation strategies. The CAP contains policies/goals related to agriculture, energy, transportation/land use, waste, and water.

THRESHOLDS OF SIGNIFICANCE

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. Governor's Office of Planning and Research's (OPR's) Guidance does not include a quantitative threshold of significance to use for assessing a proposed development's GHG emissions under CEQA. Moreover, CARB has not established such a threshold or recommended a method for setting a threshold for proposed development-level analysis.

In April 2020, SMAQMD adopted an update to their land development project operational GHG threshold, which requires a project to demonstrate consistency with CARB's 2017 Climate Change Scoping Plan. SMAQMD's technical support document, "Greenhouse Gas Thresholds for Sacramento County", identifies operational measures that should be applied to a project to demonstrate consistency.

All projects must implement Tier 1 Best Management Practices to demonstrate consistency with the Climate Change Scoping Plan. After implementation of Tier 1 Best Management Practices, project emissions are compared to the operational land use screening levels table (equivalent to 1,100 metric tons of CO2e per year). If a project's operational emissions are less than or equal to 1,100 metric tons of CO2e per year after implementation of Tier 1 Best Management Practices, the project will result in a less than cumulatively considerable contribution and has no further action. Tier 1 Best Management Practices include:

- BMP 1 – no natural gas: projects shall be designed and constructed without natural gas infrastructure.

[2] EO S-03-05 has set forth a reduction target to reduce GHG emissions by 80 percent below 1990 levels by 2050. This target has not been legislatively adopted.

- BMP 2 – electric vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards (Multi-family dwellings = 20% of total parking spaces to be EV Capable), except all EV Capable spaces shall be instead EV Ready.

    - EV Capable requires the installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)

    - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

SMAQMD's GHG construction and operational emissions thresholds for Sacramento County are shown in Table IS-15.

Table IS-15: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO_2e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO_2e	1,100 metric tons per year	10,000 metric tons per year

Methodology

The resultant GHG emissions of the project were estimated using CalEEMod, version 2016.3.2 (Appendix A).

Construction-Generated Greenhouse Gas Emissions

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. Table IS-16 illustrates the specific construction-generated GHG emissions that would result from grading, construction of homes, architectural coating, and construction of the drainage basin.

Table IS-16: Construction-Related Greenhouse Gas Emissions (Metric Tons per Year)

Emissions Source	**CO2e**
SMAQMD Construction Threshold	1,100
Project Construction-Related Emissions*	322.23
Exceeds Threshold?	**No**

Source: CalEEMod version 2016.3.2. See Appendix A for emission model outputs.

As shown in Table IS-16, project construction would result in a maximum annual generation of approximately 322.23 metric tons of CO_2e during construction; however, this is not reflective of the project in its entirety. Once construction is complete, the generation of these GHG emissions would cease. Annual construction emissions generated by the development would not exceed the County's construction-related, numeric threshold of 1,100 metric tons of CO_2e.

CONCLUSION

Construction-related GHG impacts are considered ***less than significant***.

OPERATIONAL-GENERATED GREENHOUSE GAS EMISSIONS

CalEEMod was used to estimate the project's operational GHG emissions. The developer has not confirmed whether the new units would utilize natural gas. The use of natural gas would contribute 81.48 metric tons of CO_2e annually. This would equate to approximately 8.38% of the project's total estimated operational emissions of CO_2e.

The project's location and design allow for the enabling of multiple, mobile mitigation measures within the CalEEMod platform. Mobile mitigation measures that were enabled were, Increased Density, Increase Transit Accessibility, Integrate Below-Market Rate Housing, and Improve Pedestrian Network. These mitigation measures are not mitigation within the traditional sense; rather, they are strategic land use designs that mitigate the estimated mobile emissions. The project's location within a 0.5-mile of a bus stop, the 17 unit/acre density, 100 percent of the project being affordable housing, and the improvement of pedestrian and bicycle facilities are self-mitigating and offset the estimated mobile GHG emissions by approximately 177.37 metric tons per year (15% reduction). Table IS-17 summarizes all the direct and indirect annual GHG emissions level associated with the project.

Table IS-17: Operational-Related Greenhouse Gas Emissions (Metric Tons/Year)

Emissions Source	CO_2e
Area Source (landscaping, hearth)	2.17
Energy (Electric & Natural Gas)	245.96
Mobile	705.21
Waste	33.67
Water	20.91
Total	**1,007.97**

Source: CalEEMod version 2016.3.2. See Appendix A for emission model outputs.

As shown in Table IS-17, the project would produce 1,007.97 metric tons of CO_2e annually. Mobile emissions are the primary source.

CONCLUSION

While the project proponent has not committed to developing the project in accordance with BMP 1 of the Tier 1 BMPs, the project has incorporated other mitigation strategies that more than offset the emissions resulting from the potential use of natural gas. The project will be required to implement BMP 2, which requires that each single-family unit has a minimum of one EV Ready parking space and that 20 percent of the total parking spaces for the multi-family dwellings be constructed to an EV Ready level. As shown in Table IS-17, the individual project would not exceed the SMAQMD established annual threshold of 1,100 metric tons. Impacts are considered ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures A & B are critical to ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur: (1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

As the applicant, or applicant's representative, for this project, I acknowledge that project development creates the potential for significant environmental impact and agree to implement the mitigation measures listed below, which are intended to reduce potential impacts to a less than significant level.

Applicant _[Original Signature on File]_____ Date: _____

MITIGATION MEASURE A: 45DB INTERIOR NOISE REDUCTIONS

Air conditioning units shall be provided for all units/residences within this development to allow the occupants to close doors and windows as desired for additional acoustical isolation.

Additionally, per Plate IS-3 (Figure 2 of the Noise Report; Appendix B), Buildings #2G, 2J, & 2H (shaded yellow in the graphic) will be required to install exterior windows and doors with a minimum of STC-29 (1st floor), STC-33 (2nd story), and STC-38 (3rd story) ratings. The two single- family homes located at the southeast corner of the project site (shaded blue) will be required to have exterior windows and doors with a minimum of STC-29 (1st floor) and STC-33 (2-story) ratings. The two single-family homes (shaded pink) will be required to have exterior windows and doors with a minimum of STC-29 (1st story) and STC-32 (2nd story) ratings.

MITIGATION MEASURE B: COMPLIANCE WITH THE SSHCP

The applicant shall obtain authorization through the SSHCP prior to all ground-disturbing activities, on-site and off-site. Authorization under the SSHCP shall include implementation and conformance with all applicable Avoidance and Minimization Measures (Appendix D) and payment of any fees necessary to mitigate for impacts to species and habitat.

SSHCP Authorization shall compensate for impacts associated with:

1. Impacts to SSHCP land covers, including:
    - Valley grassland
    - Stream/creek
2. Potential species-specific impacts including:
    - Burrowing owl
    - Cooper's hawk
    - Ferruginous hawk
    - Loggerhead shrike
    - Sanford's arrowhead
    - Swainson's hawk
    - Special status raptors
    - White-tailed kite
    - Western red bat*

*AMMs specific to Western red bat shall also apply to Pallid bat

MITIGATION MEASURE C: MIGRATORY BIRD NEST PROTECTION

To avoid impacts to nesting migratory birds the following shall apply:

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and September

15, a survey for active migratory bird nests shall be conducted no more than 14 day prior to construction by a qualified biologist.

2. Trees slated for removal shall be removed during the period of September through January, in order to avoid the nesting season. Any trees that are to be removed during the nesting season, which is February through September, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.

If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which has been determined by a qualified biologist, shall be established and maintained around the nest to prevent nest failure. All construction activities shall be avoided within this buffer area until a qualified biologist determines that nestlings have fledged.

MITIGATION MEASURE D: CULTURAL RESOURCES – UNANTICIPATED DISCOVERIES

In the event that human remains are discovered in any location other than a dedicated cemetery, work shall be halted and the County Coroner contacted. For all other unexpected cultural resources discovered during project construction, work shall be halted until a qualified archaeologist may evaluate the resource encountered.

1. Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop and the County Coroner and the Office of Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.

2. In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.

a. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.

b. If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

3. The appended Tribal Cultural Resources (TCRs) Awareness Brochure provides a definition and examples of TCRs that may be encountered during construction. The brochure was developed to assist construction teams with the identification and protection of TCRs. The brochure shall be shared with construction teams prior to ground disturbance.

MITIGATION MEASURE E: 20 PERCENT OF PARKING TO BE EV READY

Per Best Management Practice (BMP) 2 of the Sacramento Metropolitan Air Quality Management District (SMAQMD) Tier 1 BMPs for greenhouse gas thresholds, the developer shall provide:

a) a minimum of one EV Ready parking space per single-family unit; and

b) 20 percent of the total number of parking spaces for the multi-family dwellings shall be constructed to an EV Ready level.

EV Ready requires the installation of “raceway” (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage), adequate panel capacity for dedicated branch circuits, installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for this project as follows:

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is $7,200.00. This fee includes administrative costs of $948.00.

2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by the California Environmental Quality Act as follows:

1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.

2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.

3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. **LAND USE** - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, South Sacramento Community Plan, and Sacramento County Zoning Code.
b. Physically disrupt or divide an established community?			X		The project will not create physical barriers that substantially limit movement within or through the community.
2. **POPULATION/HOUSING -** Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The project will directly contribute to population growth. The project site is in a developed, urban area with available public services and infrastructure capacity. The proposal will result in some increases in density above existing designations, but is within an area designated for urban growth and uses.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production.
4. **AESTHETICS -** Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?				X	The project does not occur in the vicinity of any scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?				X	The project is not located in a non-urbanized area.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		Construction will not substantially degrade the visual character or quality of the project site. It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.
5. **AIRPORTS -** Would the project:					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				X	The project occurs outside of any identified public or private airport/airstrip safety zones.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?			X		The project occurs outside of any identified public or private airport/airstrip noise zones or contours.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				X	The project does not affect navigable airspace.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X	The project does not involve or affect air traffic movement.
6. **PUBLIC SERVICES -** Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The water service provider has adequate capacity to serve the water needs of the proposed project.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		The Sacramento Regional County Sanitation District has adequate wastewater treatment and disposal capacity to service the proposed project.
c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X		The Kiefer Landfill has capacity to accommodate solid waste until the year 2050.
d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing service lines are located within existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from service line extension.
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project would result in minor increases to student population; however, the increase would not require the construction/expansion of new unplanned school facilities. Established case law, *Goleta Union School District v. The Regents of the University of California* (36 Cal-App. 4th 1121, 1995), indicates that school overcrowding, standing alone, is not a change in the physical conditions, and cannot be treated as an impact on the environment.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will result in increased demand for park and recreation services, but meeting this demand will not result in any substantial physical impacts.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The is 100% affordable housing and is located within 0.5-mile of bus stops located on 47th Avenue. The project does not have more than the minimum number of required parking spaces. Bicycle and pedestrian infrastructure are proposed as part of this project and therefore, could not adversely impact either mode of transportation. Refer to the Transportation section of the IS.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.
8. **AIR QUALITY** - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. Compliance with existing dust abatement rules and standard construction mitigation for vehicle particulates will ensure that construction air quality impacts are less than significant. The California Emissions Estimator Model (CalEEMod) was used to analyze ozone precursor emissions; the project will not result in emissions that exceed standards.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		The project will not expose sensitive receptors to pollutant concentrations in excess of standards. Refer to the Air Quality section of the IS.
c. Create objectionable odors affecting a substantial number of people?				X	The project will not generate objectionable odors.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
9. **NOISE -** Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?		X			The project is in the vicinity of a noise source that generates noise in excess of applicable standards, but mitigation will reduce these impacts to less than significant levels. Refer to the Noise discussion in the Environmental Effects section above.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will not substantially increase water demand over the existing use.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding. Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?				X	The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area. Refer to the discussion in the Environmental Effects section above.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?				X	The project site is not within a 100-year floodplain.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?			X		The project is located in an area subject to 200-year urban levels of flood protection (ULOP). Refer to the Hydrology discussion in the Environmental Effects section above.
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. **GEOLOGY AND SOILS** - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?				X	The project is not located on an unstable geologic or soil unit.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?				X	A public sewer system is available to serve the project.
e. Result in a substantial loss of an important mineral resource?				X	The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. **BIOLOGICAL RESOURCES** - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?			X		The project would not have a substantial adverse effect on any special status species, nor would the project substantially reduce wildlife habitat or species populations. Refer to the Biological Resources discussion in the Environmental Effects section above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		The project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities. Refer to the Biological Resources discussion in the Environmental Effects section above.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		The aquatic resources delineation did not identify any wetlands on the project site. One man-made ditch is located on the northern end of the property and would be filled. Refer to the Biological Resources discussion above.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		The project would not result in a substantial adverse effect to native resident or migratory species. Refer to the Biological Resources discussion in the Environmental Effects section above.
e. Adversely affect or result in the removal of native or landmark trees?			X		There are three, native oaks located on the project site. All three trees are in poor condition and the arborist report has recommended their removal. Refer to the Biological Resources discussion in the Environmental Effects section above.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		There are no known conflicts with any approved plan for the conservation of habitat. The project is within the Urban Development Area of the South Sacramento Habitat Conservation Plan (SSHCP). The project will need to comply with the applicable avoidance and minimization measures outlined in the SSHCP. Refer to the Biological Resources discussion in the Environmental Effects section above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project..
b. Have a substantial adverse effect on an archaeological resource?			X		No known archaeological resources occur on-site. An archaeological survey was conducted on the project site and a subsequent report was prepared by the applicant's consultant. Refer to the Cultural Resources discussion in the Environmental Effects section above.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		The project site is located outside any area considered sensitive for the existence of undiscovered human remains. No known human remains exist on the project site; nevertheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.
14. **TRIBAL CULTURAL RESOURCES -** Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and one request for consultation was received. Refer to the Cultural Resources discussion in the Environmental Effects section above.
15. **HAZARDS AND HAZARDOUS MATERIALS** - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X	The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?				X	The project does not involve the transport, use, and/or disposal of hazardous material.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X	The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		While the project will introduce multiple dwelling units and increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are net resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The California Emissions Estimator Model (CalEEMod) was used to estimate the greenhouse gas emissions associated with the project. Based on the results, the established County threshold of 1,100 annual metric tons of CO2e will not be exceeded. Refer to the Greenhouse Gas Emissions discussion of the IS.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	**Current Land Use Designation**	**Consistent**	**Not Consistent**	**Comments**
General Plan	LDR (Low Density Residential)	X		
Community Plan	RD-10	X		South Sacramento Community Plan
Land Use Zone	RD-20 Multiple Family Residential / RD-5 Residential	X		

INITIAL STUDY PREPARERS

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Section Manager: Manuel Mejia

Project Managers: Jessie Shen/Desirae Fox

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