Office of Planning and Environmental Review
Leighann Moffitt, Director

Interim County Executive
Ann Edwards

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: PLNP2020-00079**

2. **Title and Short Description of Project:** East Lawn Sierra Hills Memorial Park
   The cemetery expansion will occur within the unincorporated County of Sacramento and in the incorporated City of Citrus Heights. To meet Sacramento County entitlements, the project is subject to a use permit to legalize and expand an existing cemetery operation in the Residential-2 zone and design review to comply with Countywide Design Guidelines. To meet the City of Citrus Heights regulations, the project is subject to a use permit for a cemetery in a low-density residential zone. The County is CEQA lead for the project and the City of Citrus Heights is a responsible agency.

   The project will occur in two undeveloped areas of the East Lawn Sierra Hills Memorial Park: a western portion of the existing cemetery, and an eastern portion between the developed cemetery and a residential neighborhood in the City of Citrus Heights. In the western portion, a paved road will be constructed in the place of an existing gravel road to connect two existing roads. In the eastern portion, up to three new mausoleum buildings will be developed and road and landscaping improvements will be made.

3. **Assessor's Parcel Number:** 229-0390-003-0000, 229-0390-018-0000, 229-0390-031-0000, and 229-0390-034-0000

4. **Location of Project:** The project is located at 5757 Greenback Lane in the unincorporated community of Carmichael/Old Foothill Farms in the County of Sacramento and 6700 Verner Avenue in the incorporated City of Citrus Heights

5. **Project Applicant:** Steve Bartel, East Lawn, Inc.

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]
Joelle Inman
Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
OFFICE OF PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2020-00079

NAME: East Lawn Sierra Hills Memorial Park

LOCATION: The project is located at 5757 Greenback Lane in the unincorporated community of Carmichael/Old Foothill Farms in the County of Sacramento and 6700 Verner Avenue in the incorporated City of Citrus Heights (Plate IS-1 and Plate IS-2).

ASSESSOR'S PARCEL NUMBER: 229-0390-003-0000, 229-0390-018-0000, 229-0390-031-0000, and 229-0390-034-0000

APPLICANT: Steve Bartel, East Lawn, Inc.
4300 Folsom Blvd, Sacramento, CA 95819
steveb@eastlawn.com

PROJECT DESCRIPTION

The cemetery expansion will occur within the unincorporated County of Sacramento and in the incorporated City of Citrus Heights (Plate IS-2). To meet Sacramento County entitlements, the project is subject to a use permit to legalize and expand an existing cemetery operation in the Residential-2 (RD-2) zone and design review to comply with Countywide Design Guidelines. To meet the City of Citrus Heights regulations, the project is subject to a use permit for a cemetery in a low-density residential zone. The County is CEQA lead for the project and the City of Citrus Heights is a responsible agency.

The project will occur in two undeveloped areas of the East Lawn Sierra Hills Memorial Park: a western portion of the existing cemetery, and an eastern portion between the developed cemetery and a residential neighborhood in the City of Citrus Heights (Plate IS-3). In the western portion, a paved road will be constructed in the place of an existing gravel road to connect two existing roads. In the eastern portion, up to three new mausoleum buildings will be developed and road and landscaping improvements will be made. Technical studies are in the appendix and are available online at: https://planningdocuments.saccounty.net/projectdetails.aspx?projectID=6872&communityID=6

Plate IS-1: Project Vicinity Map

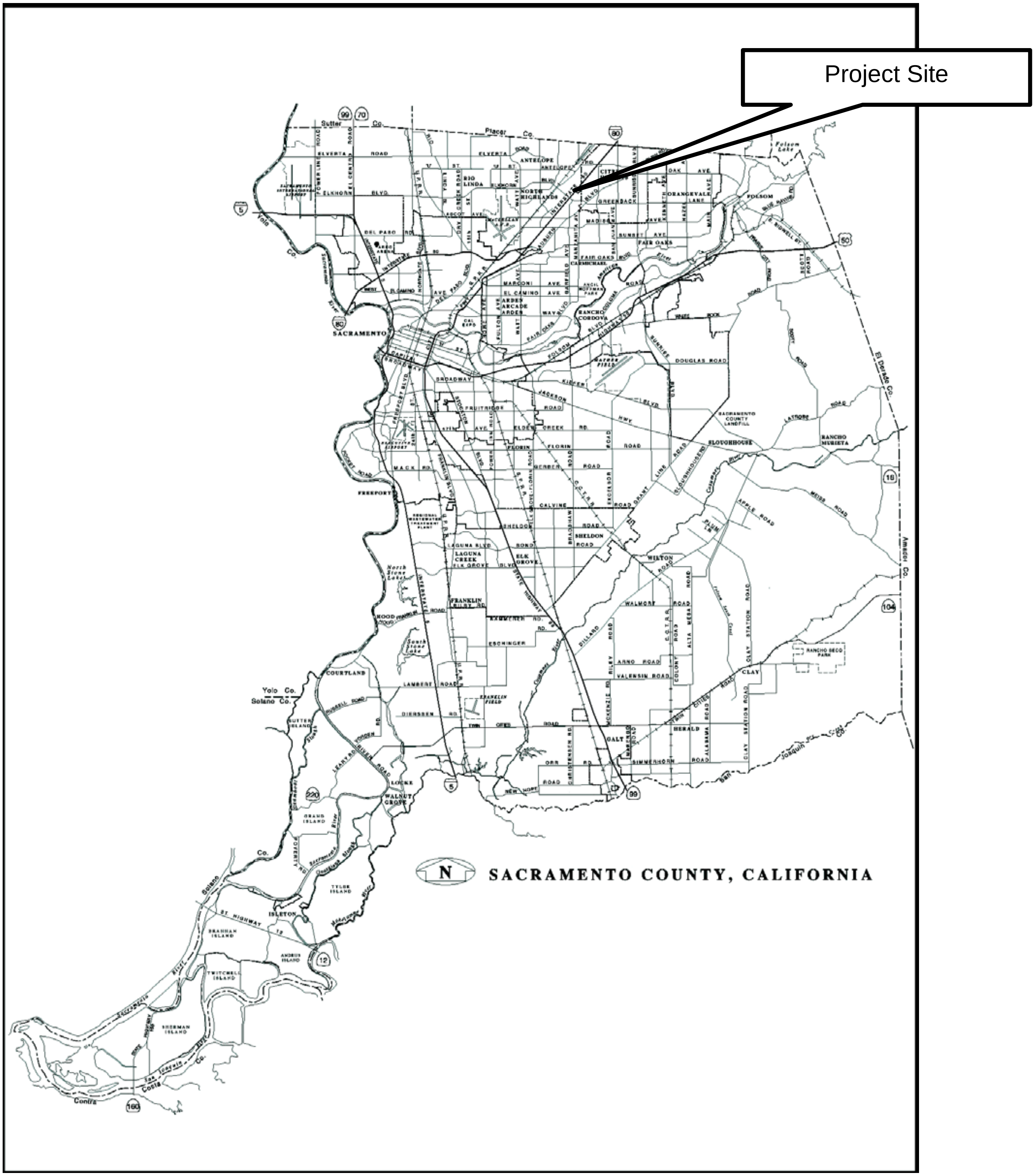


Plate IS-2: Project Area

Plate IS-3: Proposed Landscape Plans

ENVIRONMENTAL SETTING

The East Lawn Sierra Hills Memorial Park is located at 5757 Greenback Lane in Sacramento County, approximately three-quarters of a mile from Exit 98 for Greenback Lane from Business Interstate 80 East. The cemetery, which is comprised of four parcels, is immediately adjacent to residential properties and a small business park. Half of the cemetery parcels are located in Sacramento County and half in the incorporated City of Citrus Heights. The majority of the project is slated to occur within the County (Plate IS-3). The project is slated to occur on portions of undeveloped land within the greater East Lawn Sierra Hills Memorial Park, which are separated by the developed portions of the memorial park. The western portion lies solely within Sacramento County and the eastern portion includes land within the County and the City of Citrus Heights.

Western Project Area

The western project area is approximately 1-acre in size and is entirely located within Sacramento County. The area is bound on the west by a seasonal flowing, unnamed tributary to Cripple Creek (intermittent drainage), and on the remaining three sides by developed portions of the cemetery. An informal unpaved track and gravel road run north/south through the area connecting two paved roadways. There is an established riparian corridor along the unnamed tributary to Cripple Creek. This riparian community is located along the steep, incised, eastern bank of the creek. Other portions of this area contain ruderal vegetation communities (Plate IS-4).

Plate IS-4: Western Area: Location of proposed road

	
Unimproved track in west project area, looking south towards Greenback Lane from road to Veterans Memorial.	Gravel road in the west project area, looking north from road to Veterans Memorial.

Eastern Project Area

The eastern project area is approximately 26-acres in size and is located in both Sacramento County and in the City of Citrus Heights. The area is bound on the north and east by residential neighborhoods, on the south by an office park, and on the west by developed portions of the cemetery. Vegetation within this area mostly consists of annual brome grassland with scattered native oak trees. The northwestern portion of this area contains excavated dirt from the excavation of new graves. There is also a small ephemeral drainage that flows from north to south through this area. (Plate IS-5)

Plate IS-5: Eastern Area: Undeveloped Property

	
Looking south from existing Pet Cemetery.	Looking north from existing Cremation Garden and Estates.
	
Looking east at adjacent residential neighborhood.	Looking south from existing Cremation Garden and Estates.

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 potentially significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

BACKGROUND

The East Lawn Sierra Hills Memorial Park is designated as a cemetery, or public/quasi-public space in the Sacramento County General Plan and is zoned as residential (RD-2). The portions of the cemetery located within the incorporated City of Citrus Heights are zoned in the Citrus Heights General Plan as Low Density Residential. The cemetery is operating a certificate of non-conforming use; however, to the certificate prohibits expansion of the facility. East Lawn, LLC is seeking a use permit to allow for the expansion of ground-burials and the possible construction of additional mausoleum buildings. Expansion is proposed within the existing, developed cemetery and on an adjacent parcel north of the cemetery, in the City of Citrus Heights.

HYDROLOGY AND WATER QUALITY

- 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?

WATER QUALITY

The following discussion describes the Stormwater Ordinance, best management practices for erosion control, and design requirements to prevent and manage stormwater runoff. Grading for the proposed infrastructure improvements and the issuance of a building permit is dependent on adherence with these measures.

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:

- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?
- Adversely affect or result in the removal of native or landmark trees?
- Have a substantial adverse effect on riparian habitat or other sensitive natural communities?

WETLANDS/WATERS OF THE US

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 above-ground 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 (USACE) is generally the lead agency for the federal permit process, and the Regional Water Quality Control Board (RWQCB) 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. Isolated wetlands, that is, those wetlands that are not hydrologically connected to other "navigable" surface waters (or their tributaries), are not considered to be subject to the Clean Water Act.

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. Pursuant to these policies, any wetlands to be excavated or filled require 1:1 mitigation, and construction within the wetlands cannot take place until the appropriate permit(s) have been obtained from the Army Corps, the U.S. Fish and Wildlife Service (USFWS), the Regional Water Board, the California Department of Fish and Wildlife and any other agencies with authority over surface waters. Any loss of delineated wetlands not mitigated for through the permitting process must be mitigated, pursuant to County policy. Appropriate mitigation may include establishment of a conservation easement over wetlands, purchase of mitigation banking credits, or similar measures.

PROJECT IMPACTS

Madrone Ecological Consulting, LLC conducted a wetland delineation in April 2020 (Appendix A). The jurisdictional and non-jurisdictional aquatic features are summarized in Table IS-1 and delineated in Plate IS-6. Jurisdictional wetland features were identified in the eastern and western portions of the cemetery. The man-made aquatic features within the cemetery property appear to gather and convey natural precipitation only.

Table IS-1: Aquatic Features

Jurisdictional Waters		0.212 acre
	Seasonal Wetlands	0.005 acre
	Seasonal Wetland Swale	0.046 acre
Other Waters		*0.161 acre*

	Ephemeral Drainage	0.117 acre
	Intermittent Drainage	0.044
Non-Jurisdictional Waters		0.309 acre
	Wetlands	0.300 acre
	Man-made Wetland	0.023 acre
	Man-made Non-Depressional Wetland	0.277 acres
Other Waters		0.009 acre
	Man-made Ditch	0.009 acre

In the eastern portion, the single natural seasonal wetland (0.005 acre) is located in the northeastern tip of the property, adjacent to the residential neighborhood and appears to receive natural precipitation only. Other aquatic features in the eastern portion are seasonal and did not contain special status plant species. The wetland swales identified (0.046 acre) are located in two areas along the north-south ephemeral drainage through the area. The ephemeral drainage (0.117 acre) results from surface water runoff and exits the cemetery property through a small concrete box culvert, which conveys the water through the adjacent residential neighborhood and into Cripple Creek.

The site plan does not show work occurring in, or within 50' of the location of the natural seasonal wetland; however, the proposed roads will cross the ephemeral drainage area. The Department of Water Resources (DWR, Durkee, 3/30/2020) reviewed the site plan and indicated that road crossings over the drainage/culvert must be designed so that existing residential property upstream is not adversely impacted. DWR will review plans for the final crossings to ensure the flow of the ephemeral drainage is not impeded. Work proposed within the confines of the jurisdictional aquatic features will require permitting consistent through the USACE and RWQCB, consistent with the Clean Water Act.

In the western portion of the cemetery, jurisdictional intermittent drainage is located in a deeply incised channel at the perimeter of the property. The drainage contains pooled water and appears to only flow during and for periods after precipitation events. No vegetation was observed within the channel of this drainage. Vegetation along the steep bank of the drainage consisted of a dense riparian canopy of Valley oak, Fremont's cottonwood, black willow, and California walnut with an understory of fig and Chinese privet.

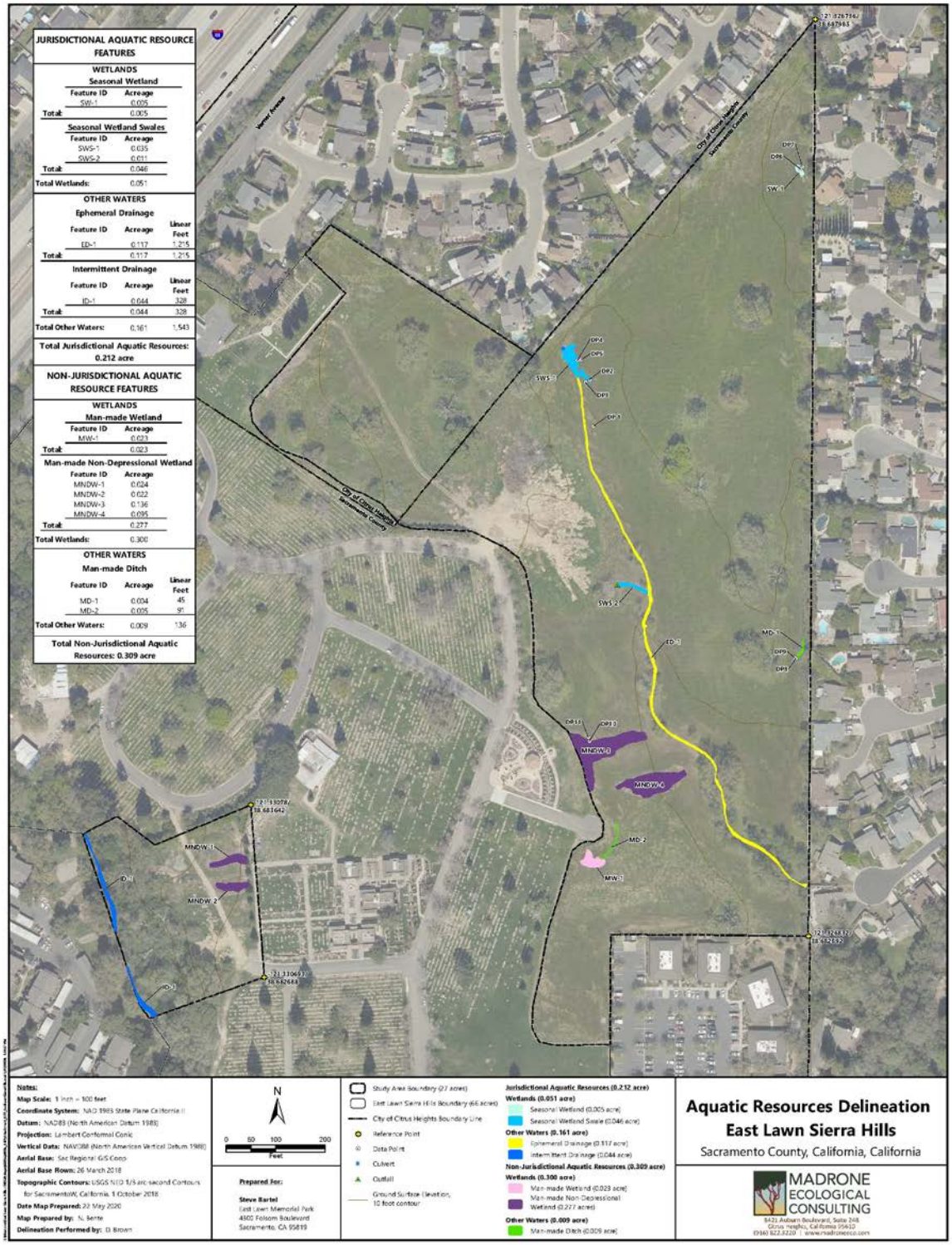
The road proposed on the western portion of the project area will not occur within the confines of the channel that contains intermittent jurisdictional drainage. There is no regulatory setback for other surface waters, but the County Environmental Review Section has typically required a minimum 50-foot setback[1]. Maintenance of these

[1] Research suggests that some of the most common urban runoff pollutants – including sediment, nitrogen, and phosphorus – can be filtered over this distance by intervening vegetation. Source: McElfish, James M. et al. 2008. Planner's Guide to Wetland Buffers for Local Governments. Environmental Law Institute, Washington, D.C.

setbacks will avoid indirect impacts to the surface water. Mitigation has been included to ensure that development will not occur within fifty feet (50') of the wetland features.

Mitigation has been included such that work proposed within the vicinity of the jurisdictional aquatic features will require either a 50' setback from delineated features, or submittal of compliance with the Clean Water Act through submittal of permits issued by the USACE and RWQCB. With mitigation impacts are ***less than significant***.

Plate IS-6: Aquatic Resources Delineation



SPECIAL STATUS SPECIES

SWAINSON'S HAWK AND NESTING RAPTORS

The Swainson's hawk (*Buteo swainsoni*) is listed as a threatened species by the State of California and is a candidate for federal listing as threatened or endangered. 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.

Swainson's hawks feed primarily upon small mammals, birds, and insects. Their typical foraging habitat includes native grasslands, alfalfa and other hay crops that provide suitable habitat for small mammals. Certain other row crops and open habitats also provide some foraging habitat. The availability of productive foraging habitat near a Swainson's hawk's nest site is a critical requirement for nesting and fledgling success. In central California, about 85% of Swainson's hawk nests are within riparian forest or remnant riparian trees. CEQA analysis of impacts to Swainson's hawks consists of separate analyses of impacts to nesting habitat and foraging habitat.

The CEQA analysis provides a means by which to ascertain impacts to the Swainson's hawk. When the analysis identifies impacts, mitigation measures are established that will reduce impacts to the species to a less than significant level. Project proponents are cautioned that the mitigation measures are designed to reduce impacts and do not constitute an incidental take permit under the California Endangered Species Act (CESA). Anyone who directly or incidentally takes a Swainson's hawk, even when in compliance with mitigation measures established pursuant to CEQA, may violate the California Endangered Species Act.

FORAGING HABITAT IMPACT METHODOLOGY

The California Department of Fish and Wildlife (CDFW) recommends evaluating project sites located within 10 miles of recorded Swainson's hawk nests because the raptors most commonly forage within that range. To determine impacts to the foraging habitat of Swainson's hawks, the CDFW recommends either implementation of the measures set forth in their Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California (November 1, 1994); or, the development of a more location-specific methodology. In May of 2006, CDFW approved a methodology to determine impacts to the foraging habitat of Swainson's hawks in Sacramento County. The Board of Supervisors adopted an ordinance to establish a Swainson's Hawk Impact Mitigation Program (Chapter 16.130 of the Sacramento County Code). The Program has been amended several times; the latest amendment went into effect in December of 2009.

The value of Swainson's hawk foraging habitat is greatest in open space areas not fragmented development, and lessens as properties develop with increasingly more intensive uses on smaller parcel sizes. Therefore, there is a strong correlation between the presence of suitable habitat and zoning for large agricultural parcels; conversely,

areas zoned for agricultural-residential or more dense uses tended to have fragmented, or absent habitat. Although there may be individual properties which do not follow the observed regional trend, CDFW concluded that the value of Swainson's hawk habitat in Sacramento County correlates to the minimum parcel size allowed by zoning. Implementation of mitigation based on the following sliding scale would result in adequate cumulative mitigation for the species (Table IS-2).

Table IS-2: Swainson's Hawk Foraging Habitat Value by Zoning Category

Zoning Category	Habitat Value Remaining
AG-40 and above (e.g., AG-80, 160 etc.)	100%
AG-20	75%
AR-10	25%
AR-5 and smaller (e.g., AR-2, 1 or RD-5, 7, 10, 15, 20 etc.)	0%

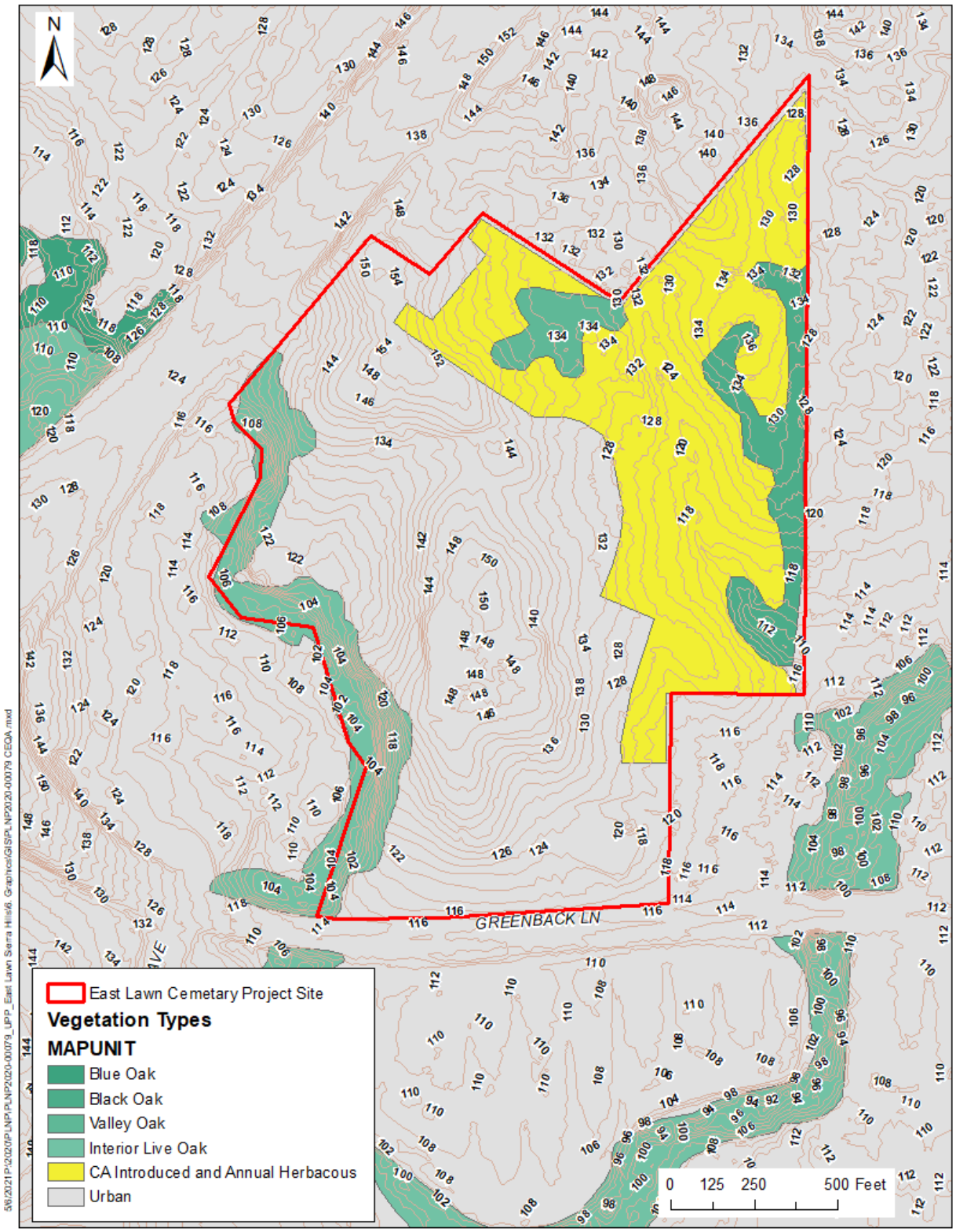
The methodology assumes that properties with zoning of AG-40 and larger maintain 100% of their foraging habitat value and properties with AR-5 zoning and smaller have lost all foraging habitat value. The percentage of foraging value lost between zones between AG-40 and AR-5 reflect the fragmentation of large agricultural land holdings and changes in land use from general agriculture to agricultural-residential.

PROJECT IMPACTS

The undeveloped eastern portion of the cemetery includes approximately 18 acres of perennial and invasive grasslands. Madrone Ecological Consulting, LLC surveyed the vegetation of the project site in April of 2020 (Appendix B). Annual brome grassland was the most abundant vegetation community identified within the undeveloped project area. This vegetation community is dominated by non-native annual grasses and forbs, such as wild oat (*Avena barbata*), soft brome (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), and perennial ryegrass (*Festuca perennis*). Other species commonly occurring in this community on-site include broad leaf filaree (*Erodium botrys*), cut-leaf geranium (*Geranium dissectum*), blow wives (*Achyrachaena mollis*), rose clover (*Trifolium hirtum*), and hairy vetch (*Vicia villosa*).

The undeveloped project sites containing grasslands are located on the main cemetery lot and the immediately adjacent parcel to the north. Both parcels are zoned as RD-2. The developed cemetery within the parcel is depicted as urban development on CDFW vegetation maps (Plate IS-7). On the north, the cemetery property is adjacent to Interstate 80 and is surrounded by developed (urban) uses. In accordance with the Swainson's hawk methodology for Sacramento County, the development of a parcel with RD-2 zoning does not necessitate mitigation.

Plate IS-7: Topography and Vegetation of Project Site



NESTING HABITAT IMPACT METHODOLOGY

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, CDFW recommends utilizing the methodology set forth in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). The document recommends that surveys be conducted for the two survey periods immediately prior to the **start of construction**. The five survey periods are defined by the timing of migration, courtship, and nesting in a typical year. Surveys should extend a ¼ -mile radius around all project activities, and if active nesting is identified, CDFW should be contacted.

Table IS-3: Recommended Survey Periods for Swainson's Hawk (TAC 2000)

Period #	Timeframe	# of surveys required	Notes
I.	Jan. 1 – Mar. 20	1	Optional, but recommended
II.	Mar. 20 – Apr. 5	3	
III.	Apr. 5 – Apr. 20	3	
IV.	Apr. 21 – June 10	N/A	Initiating surveys is not recommended during this period
V.	June 10 – July 30	3	

PROJECT IMPACTS

The closest recorded Swainson's hawk nests to the project site are located along the American and Sacramento rivers, approximately 4-5 miles from the project site; however, the project site includes riparian habitat and several native oaks, which could contain nests. Pre-construction surveys are, therefore, required to ensure that construction activities do not agitate nesting hawks, potentially resulting in nest abandonment or other harm to nesting success.

If construction will occur during the nesting season of March 1 to September 15, mitigation for Swainson's hawk and other nesting raptors involves pre-construction nesting surveys in accordance with Table IS-3, above, to identify active nests and to implement avoidance measures if nests are found. The number of surveys employed will be dependent on the proposed date of construction. According to the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley,* prepared by the Swainson's Hawk Technical Advisory Committee (May 2000), the risk for impacts to nesting birds is lower in environments near roadways and areas that have high human use. The purpose of the survey requirement is to ensure that construction activities do

not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact CDFW to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. With nesting survey mitigation, impacts to nesting raptors are ***less than significant***.

MIGRATORY NESTING BIRDS

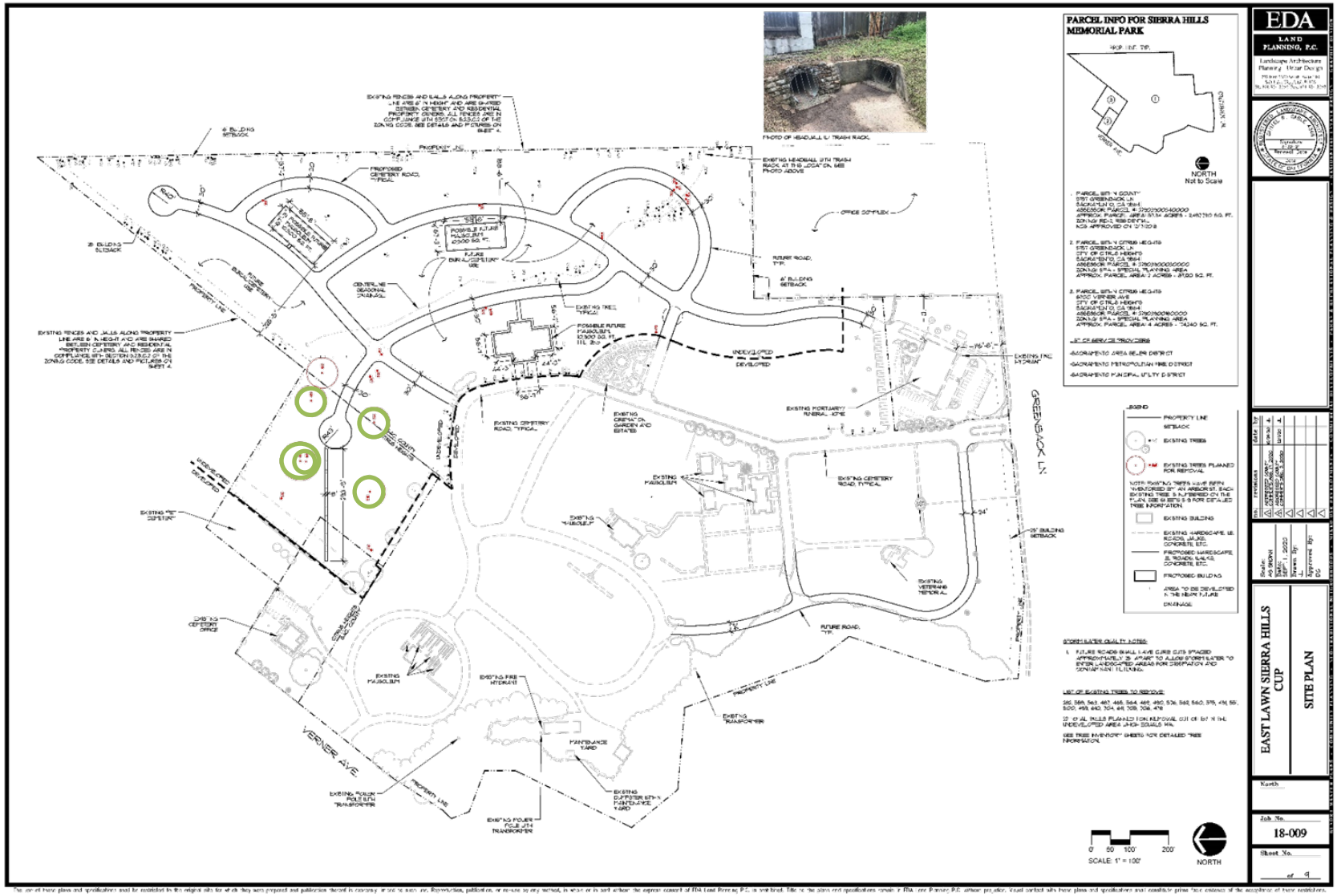
The Migratory Bird Treaty Act of 1918, which states "unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(18) of the Federal Endangered Species Act 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 considered "take."

Large native oak trees and the riparian habitat along the unnamed tributary to Cripple Creek provide potential nesting habitat for migratory birds. To avoid take of nesting migratory birds, mitigation has been included either to require that activities occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. Impacts to migratory birds are ***less than significant.***

TREE PROTECTIONS

Expansion of the East Lawn Cemetery will result in the removal of twenty (20) trees and may result in tree encroachment in Sacramento County and the City of Citrus Heights (**Plate IS-8**). Impacts and mitigation for trees will be evaluated and calculated according to the policies of each respective jurisdiction. Please note that the trees outlined in green on the site plan below are located within the City of Citrus Heights.

Plate IS-8: Tree Removal Plan



Note: Trees outlined in green are located in the City of Citrus Heights.

SACRAMENTO NATIVE AND LANDMARK 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, as follows:

- 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*).

SACRAMENTO TREE PROJECT IMPACTS

The project site contains areas of sparse to dense tree coverage. A tree inventory was prepared by EDA Land Planning in November of 2020 (Appendix C). The inventory identified a total of 14 native oaks in the cemetery expansion area in Sacramento County that are slated for removal. Of the oaks that will be removed, four (4) are in poor condition (#490, #611, #705, and #706) and do not require mitigation. The 14 mature, healthy oaks that will be removed have a total dbh of 228 inches (Plate IS-8 above and Table IS-4 below).

Table IS-4: Sacramento County Trees to be Removed

Tally	Tree No.	Tree	Condition	DBH in inches
1	490	Valley oak.	Poor: cavity decay.	48
2	491	Valley oak	Good	20
3	499	Valley oak	Good	13
4	500	Valley oak	Good	40
5	551	Valley oak.	Fair: signs of stress	46
6	560	Interior live oak	Fair	13
7	562	Valley oak	Good	16
8	564	Blue oak	Fair	49
9	576	Valley oak	Good	8
10	610	Valley oak	Fair: poor structure	14
11	611	Valley oak	Poor: pest problem, poor structure.	12
12	704	Interior live oak	Fair	9
13	705	Valley oak	Poor: laying on ground.	7
14	706	Valley oak	Poor: laying on ground.	7
Total				228

In addition to those trees that will be removed for the infrastructure improvements, native oaks located adjacent to the development may be impacted by permanent encroachment. For example, paving may occur within the driplines of a stand of oaks located in the eastern portion of the project site (605, 609, 707, 708, and 709) (Plate IS-9 and Plate IS-10 below). Prior to the issuance of grading permits, the applicant shall provide an updated tree removal plan that overlays the driplines of trees adjacent to the proposed improvements and mitigation fees will be updated.

Plate IS-9: Eastern Area – Tree Protection

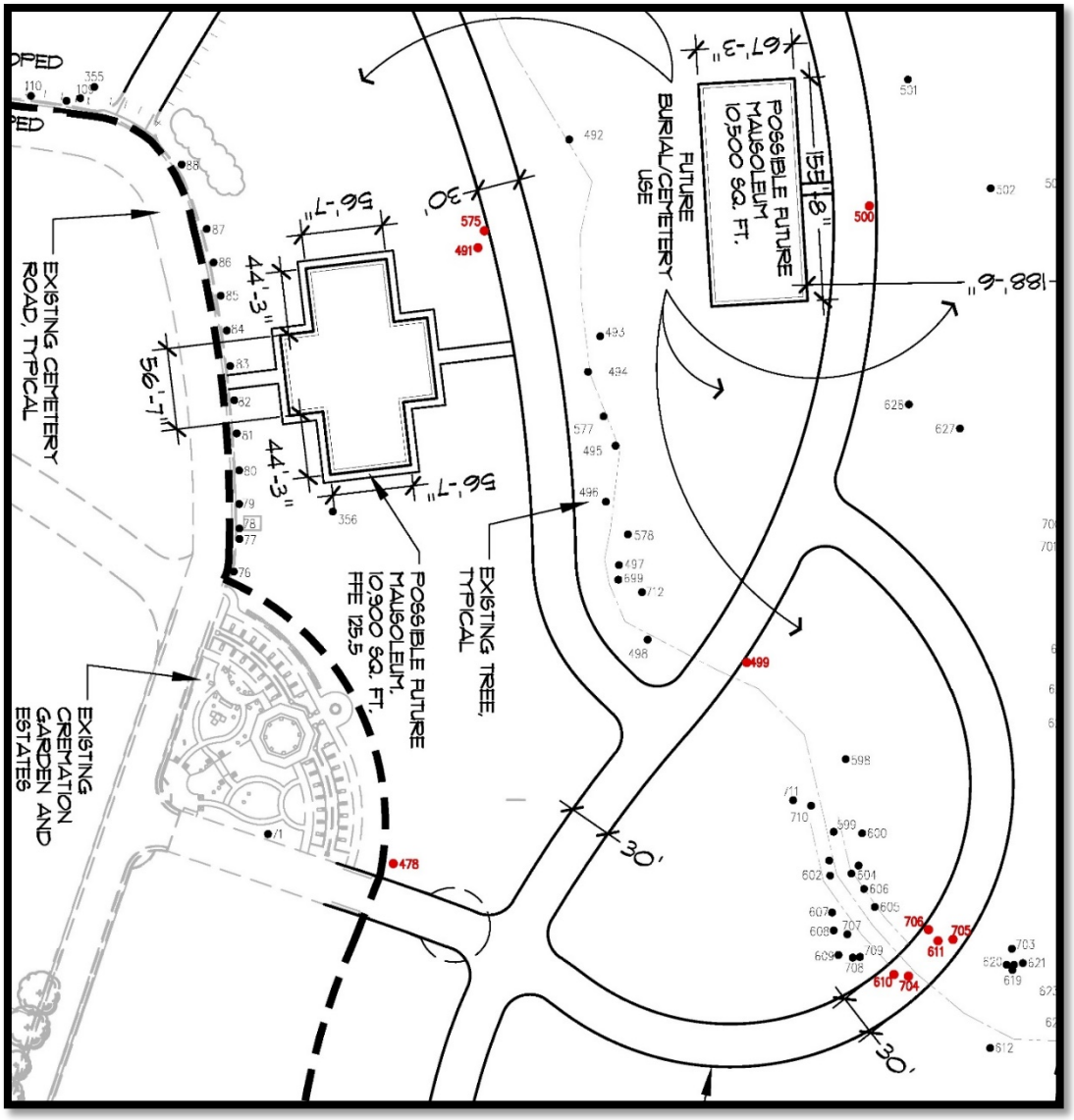
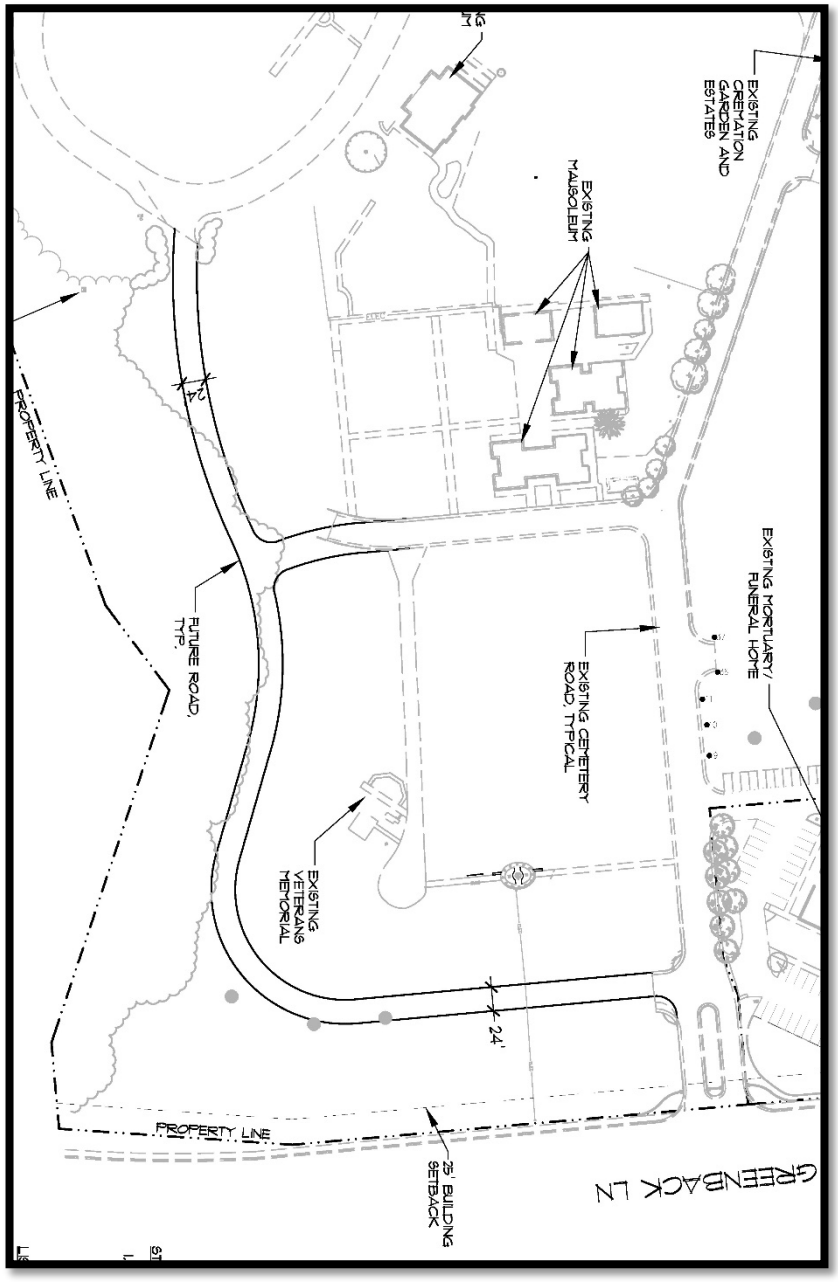


Plate IS-10: Western Area – Proposed Road



Temporary Tree Impacts

Those trees located adjacent to capital improvements may experience temporary encroachment during construction. To prevent the staging of equipment within the driplines of trees adjacent to work, the applicant will submit a tree protection plan prior to the issuance of grading permits. With the submittal of plans showing tree driplines that may be permanently and/or temporarily impacted by construction, impacts associated with the removal of native trees are ***less than significant.***

CITY OF CITRUS HEIGHTS TREE PROTECTIONS

The City of Citrus Heights Tree Preservation and Protection Ordinance (Municipal Code Chapter 106.39.010) regulates the removal of, and construction within, the dripline of protected trees. Protected trees include native oaks with a single trunk greater than 6 inches or aggregate of trunks greater than 10 inches in diameter, and mature trees with trunks greater than 19 inches in diameter. The City of Citrus Heights exempts willow, alder, fruit, eucalyptus, cottonwood, pine, catalpa, fruitless mulberry, and palm trees from the City's tree preservation and protection regulations."

CITY OF CITRUS HEIGHT TREE IMPACTS

A total of 5 trees will be removed from the portion of the East Lawn Sierra Hills Memorial Park located within the jurisdiction of Citrus Heights: 4 valley oaks and 1 blue oak (**Table IS-5**). One tree (#563) has a diameter at breast height (dbh) of less than 6 inches; because it is not considered a mature tree, its DBH does not require mitigation. The total DBH that will be removed is approximately 186 inches.

Table IS-5: City of Citrus Heights Trees to be Removed

Tally	Tree No.	Tree	Condition	DBH in inches
1	282	Valley oak.	Good	22
2	465	Blue oak.	Fair	35
3	487	Valley oak.	Good	37
4	489	Valley oak	Good	45
5	559	Valley oak	Good	47
6	563	Valley oak	Good	3
Total				186

The development proposed within the jurisdiction of the City of Citrus Heights will not result in temporary or permanent encroachment of trees. Mitigation is included for the removal of trees within the jurisdiction; therefore, impacts associated with the removals of trees will be ***less than significant.***

RIPARIAN HABITAT AND STREAMS

Riparian habitat is defined as a distinct community of plants and animals found in and alongside a stream or river. These communities can be up to a mile wide adjacent to large rivers, or a narrow border along the banks of small creeks. A stream is defined as a linear flowing waterway, either ephemeral or perennial, with a defined bed and banks. For riparian habitat, an impact is defined as any direct removal or modification of the habitat. For streams, a direct impact may occur if any fill or excavation occurs within the ordinary high water mark, which is the active channel of a stream. There is no regulatory setback for work proximate to streams, but the County typically requires a minimum 50-

foot setback[2] to avoid indirect impacts, such as the flow of polluted stormwater runoff into the channel Plate IS-11.

[2] Research suggests that some of the most common urban runoff pollutants – including sediment, nitrogen, and phosphorus – can be filtered over this distance by intervening vegetation. Source: McElfish, James M. et al. 2008. Planner's Guide to Wetland Buffers for Local Governments. Environmental Law Institute, Washington, D.C.

Plate IS-11: Riparian Corridor along Western Property Edge

	
Incised channel with intermittent drainage along western edge of the cemetery property, looking south.	Looking southeast, up embankment from edge of incised channel.
	
Edge of riparian corridor, looking northwest. Verner Avenue in background.	Edge of riparian corridor, looking north from Greenback Lane.

PROJECT IMPACTS

As described in the Hydrology and Wetlands section of this document, the western project area contains a narrow riparian corridor at the westernmost parcel edge, along the unnamed tributary to Cripple Creek. The ephemeral tributary is located in a deeply incised channel, bordered by a mix of Valley oak, Fremont's cottonwood (*Populus fremontii* subsp. *Fremontii*) and black willow (*Salix gooddingii*) with a mixed understory of Himalayan blackberry (*Rubus armeniacus*), Chinese privet (*Ligustrum lucidum*), fig (*Ficus*

carica), northern California black walnut (*Juglans hindsii*), and a sparse understory of annual grasses and forbs.

No trees will be removed for construction of the new road. Furthermore, construction will not occur within the ordinary high water mark of the ephemeral drainage located within the channel. The new road will be at least 50 feet from the edge of the deeply incised drainage channel and so impacts to the riparian area are unlikely. To protect against indirect impacts to the creek, erosion and sediment best management practices (discussed fully in the Hydrology and Water Quality section of this document) will be in place to keep construction-related wastes and pollutants out of the streambed. Therefore, with standard construction best management practices in place, impacts to the riparian area will be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures (A - E) 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: JURISDICTIONAL WATERS PROTECTION AND COMPENSATION

To compensate for impacts to state and/or federally jurisdictional waters, the applicant shall obtain all applicable permits from the Army Corps of Engineers and the Central Valley Regional Water Quality Control Board prior to issuance of improvement plans.

In areas where wetlands/waters are to be avoided, a 50' setback from waters shall be maintained, unless otherwise approved by the Environmental Coordinator. The Environmental Coordinator will review the proposed plans to ensure that construction will not occur the approved buffer from jurisdictional waters.

MITIGATION MEASURE B: SWAINSON'S HAWK AND NESTING RAPTORS

If construction, grading, or project-related improvements are to commence between February 1 and September 15, focused surveys for Swainson's hawk nests shall be conducted by a qualified biologist within a ¼ -mile radius of project activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). To meet the minimum level of protection for the species, surveys should be completed for the two survey periods immediately prior to commencement of construction activities in accordance with the 2000 TAC recommendations. If active nests are found, CDFW shall be contacted to determine appropriate protective measures, and these measures shall be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, no further mitigation will be required.

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 August 31, 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 should 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 August, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.

3. If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which shall be 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, or until September 1.

MITIGATION MEASURE D: SACRAMENTO COUNTY NATIVE TREE REMOVAL

The removal of 228 inches dbh of native trees (491, 499, 500, 551, 560, 562, 564, 576, 610, 704) shall be compensated for by planting in-kind native trees equivalent to the dbh inches lost, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. If final improvement plans involve encroachment to oaks beyond those listed above, then partial mitigation fees will be required when encroachment exceeds 20% of a tree.

Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. A total of 228 inches will require compensation.

Tree No.	Tree	Condition	DBH in inches
491	Valley oak	Good	20
499	Valley oak	Good	13
500	Valley oak	Good	40
551	Valley oak.	Fair: signs of stress	46
560	Interior live oak	Fair	13
562	Valley oak	Good	16
564	Blue oak	Fair	49
576	Valley oak	Good	8
610	Valley oak	Fair: poor structure	14
704	Interior live oak	Fair	9

Equivalent compensation based on the following ratio is required:

- one D-pot seedling (40 cubic inches or larger) = 1 inch dbh

- one 15-gallon tree = 1 inch dbh
- one 24-inch box tree = 2 inches dbh
- one 36-inch box tree = 3 inches dbh

Prior to the approval of Improvement Plans or Building Permits, whichever occurs first, a Replacement Tree Planting Plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the Environmental Coordinator for approval. The Replacement Tree Planting Plan(s) shall include the following minimum elements:

1. Species, size and locations of all replacement plantings and < 6-inch dbh trees to be preserved
2. Method of irrigation
3. If planting in soils with a hardpan/duripan or claypan layer, include the Sacramento County Standard Tree Planting Detail L-1, including the 10-foot deep boring hole to provide for adequate drainage
4. Planting, irrigation, and maintenance schedules;
5. Identification of the maintenance entity and a written agreement with that entity to provide care and irrigation of the trees for a 3-year establishment period, and to replace any of the replacement trees which do not survive during that period.
6. Designation of 20-foot root zone radius and landscaping to occur within the radius of trees < 6 inches dbh to be preserved on-site.

No replacement tree shall be planted within 15 feet of the driplines of existing native trees or landmark size trees that are retained on-site, or within 15 feet of a building foundation or swimming pool excavation. The minimum spacing for replacement native trees shall be 20 feet on-center. Examples of acceptable planting locations are publicly owned lands, common areas, and landscaped frontages (with adequate spacing). Generally unacceptable locations are utility easements (PUE, sewer, storm drains), under overhead utility lines, private yards of single family lots (including front yards), and roadway medians.

If tree replacement plantings are demonstrated to the satisfaction of the Environmental Coordinator to be infeasible for any or all trees removed, then compensation shall be through payment into the County Tree Preservation Fund. Payment shall be made at a rate of $325.00 per dbh inch removed but not otherwise compensated, or at the prevailing rate at the time payment into the fund is made.

MITIGATION MEASURE E: SACRAMENTO COUNTY TREE PROTECTION

For the purpose of this mitigation measure, a native tree is defined as an oak having 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 at least 10 inches. The following five trees will be retained and protected during construction: 605, 609, 707, 708, and 709.

Additionally, all native trees on the project site, all portions of adjacent off-site native trees which have driplines that extend onto the project site, and all off-site native trees which may be impacted by utility installation and/or improvements associated with this project, shall be preserved and protected as follows:

1. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb shall constitute the dripline protection area of the tree. Limbs must not be cut back in order to change the dripline. The area beneath the dripline is a critical portion of the root zone and defines the minimum protected area of the tree. Removing limbs which make up the dripline does not change the protected area.

2. Chain link fencing or a similar protective barrier shall be installed one foot outside the driplines of the native trees prior to initiating project construction, in order to avoid damage to the trees and their root system.

3. No signs, ropes, cables (except cables which may be installed by a certified arborist to provide limb support) or any other items shall be attached to the native trees.

4. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the driplines of the native trees.

5. Any soil disturbance (scraping, grading, trenching, and excavation) is to be avoided within the driplines of the native trees. Where this is necessary, an ISA Certified Arborist will provide specifications for this work, including methods for root pruning, backfill specifications and irrigation management guidelines.

6. All underground utilities and drain or irrigation lines shall be routed outside the driplines of native trees. Trenching within protected tree driplines is not permitted. If utility or irrigation lines must encroach upon the dripline, they should be tunneled or bored under the tree under the supervision of an ISA Certified Arborist.

7. Drainage patterns on the site shall not be modified so that water collects or stands within, or is diverted across, the dripline of oak trees.

8. No sprinkler or irrigation system shall be installed in such a manner that it sprays water within the driplines of the oak trees.

9. Tree pruning that may be required for clearance during construction must be performed by an ISA Certified Arborist or Tree Worker and in accordance with the American National Standards Institute (ANSI) A300 pruning standards and the International Society of Arboriculture (ISA) “Tree Pruning Guidelines”.

10. Landscaping beneath the oak trees may include non-plant materials such as boulders, decorative rock, wood chips, organic mulch, non-compacted decomposed granite, etc. Landscape materials shall be kept two (2) feet away from the base of the trunk. The only plant species which shall be planted within the driplines of the oak trees are those which are tolerant of the natural semi-arid environs of the trees. Limited drip irrigation approximately twice per summer is recommended for the understory plants.

11. Any fence/wall that will encroach into the dripline protection area of any protected tree shall be constructed using grade beam wall panels and posts or piers set no closer than 10 feet on center. Posts or piers shall be spaced in such a manner as to maximize the separation between the tree trunks and the posts or piers in order to reduce impacts to the trees.

12. For a project constructing during the months of June, July, August, and September, deep water trees by using a soaker hose (or a garden hose set to a trickle) that slowly applies water to the soil until water has penetrated at least one foot in depth. Sprinklers may be used to water deeply by watering until water begins to run off, then waiting at least an hour or two to resume watering (provided that the sprinkler is not wetting the tree's trunk. Deep water every 2 weeks and suspend watering 2 weeks between rain events of 1inch or more.

MITIGATION MEASURE F: CITY OF CITRUS HEIGHTS TREE REMOVAL

Trees 282, 465, 487, 489, and 559 (totaling 186 inches dbh) are within Citrus Heights jurisdiction.

Tree No.	Tree	Condition	DBH in inches
282	Valley oak.	Good	22
465	Blue oak.	Fair	35
487	Valley oak.	Good	37
489	Valley oak	Good	45
559	Valley oak	Good	47

Please note the replacement tree calculation for these trees mirrors the county requirements:

- One 15-gal tree = 1 inch dbh
- One 24-inch box = 2 inches dbh
- One 36-inch box = 3 inches dbh

The proposed project will abide by the Standard Policies and Procedures for Approved Work listed in Section 106.39.050 of the City's Tree Preservation and Protection Ordinance. If required by the City upon approval of the Tree Permits, replacement tree plantings or in-lieu mitigation fees will be completed or paid in accordance with City requirements. Payment shall be made at a rate of $298 per dbh inch removed.

Replacement Tree Monitoring: Replacement trees planted by the applicant shall be monitored for a period of 3 years. The applicant shall retain a qualified arborist or biologist to complete annual monitoring reports. The monitoring reports shall provide information regarding the use of irrigation for the replacement trees, any repairs needed for the irrigation system, any vegetation management that has been completed or is recommended, and the survival rate of all replacement trees. If any trees fail within the first 3 years after planting, the applicant shall replace those trees on site and monitor the newly planted trees for a total of 3 years from the date of planting, unless other success criteria is established in a replanting plan that meets the requirements of Section 106.39.060.C of the City of Citrus Heights Municipal Code.

MITIGATION MEASURE COMPLIANCE

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

1. It shall be the responsibility of the project applicant to reimburse the County for all expenses incurred in the implementation of the Mitigation Monitoring and Reporting Program (MMRP), including any necessary enforcement actions. The applicant shall pay an initial deposit of **$7,900**, which includes administrative costs of **$948.00**. Over the course of the project, the Office of Planning and Environmental Review will regularly conduct cost accountings and submit invoices to the applicant when the County monitoring costs exceed the initial deposit.

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 the environmental requirements of all applicable land use plans and policies for the City of Citrus Heights and the County of Sacramento. Refer to the Land Use discussion in the Environmental Effects section above
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 neither directly nor indirectly induce substantial unplanned population growth.
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		Construction will not substantially degrade the visual character or quality of the project site.
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.
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.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
6. **PUBLIC SERVICES -** Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The project will not result in increased demand for water supply.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?				X	The project will not require wastewater services.
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	The project will not require construction or expansion of new water supply, wastewater treatment, or wastewater disposal facilities.
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			X		Improvement/grading plans will be provided to the County Department of Water Resources for review and approval pursuant to current Improvement Standards, Water Agency Code, the Floodplain Management Ordinance, and the Stormwater Quality Manual. Road crossings over the through drainage ditch must be designed so that existing residential property upstream is not adversely impacted. An overland release analysis may be required to the discretion of Water Resources.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?				X	The project will not require electric or natural gas service.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?				X	The project will not increase demand for emergency services.
h. Result in substantial adverse physical impacts associated with the provision of public school services?				X	The project will not require the use of public school services.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?				X	The project will not require park and recreation services.
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 proposed project will have no impacts on vehicle miles traveled and is presumed to cause a less than significant transportation impact. Expansion of the cemetery will not result in additional miles traveled.
b. Result in a substantial adverse impact to access and/or circulation?				X	No changes to existing access and/or circulation patterns would occur as a result of the project.
c. Result in a substantial adverse impact to public safety on area roadways?				X	No changes to existing access and/or circulation patterns would occur as a result of the project; therefore no impacts to public safety on area roadways will result.
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.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		See Response 8.a.
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 not in the vicinity of any uses that generate substantial noise, nor will the completed project generate substantial noise. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.
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.
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.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?				X	The project is not located in an area subject to 200-year urban levels of flood protection (ULOP).
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.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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; however, expansion of the cemetery will not necessitate expansion of the wastewater system.
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. Although located in an area with known mineral resources, the proposed project would not significantly impact future use of important mineral resources located on 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 area contains the potential to serve as nesting habitat for Swainson's hawk. Mitigation has been included to minimize impacts to less than significant. 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 site contains riparian habitat along the incised channel in the western portion of the project site. Mitigation for potential impacts to native trees within the riparian corridor is included to reduce impacts to less than significant levels. 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			A stream crosses the project site. The County Department of Water Resources will review grading/improvement plans prior to the construction of roads across the ephemeral drainage in the project area. No construction activities are proposed within the intermittent drainage channel. Refer to the Biological Resources discussion in the Environmental Effects section above.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?		X			Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected.
e. Adversely affect or result in the removal of native or landmark trees?		X			Native and/or landmark trees occur on the project site and/or may be affected by on and/or off-site construction. Mitigation is included to ensure impacts are less than significant. 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.

	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		A cultural resources survey was prepared; no historical resources were identified.
b. Have a substantial adverse effect on an archaeological resource?			X		No known archaeological resources occur on-site.
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.
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 request for consultation was not received. Tribal cultural resources have not been identified in the project area.
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.
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.

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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		Expansion of the cemetery will not increase energy consumption.
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.
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 project does not exceed the threshold for GHG construction emissions and the project won't see an increase in operational GHG emissions.
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
Sacramento County General Plan City of Citrus Heights General Plan	PQP – cemetery, public, quasi-public Low Density Residential	X		
Carmichael Community Plan	Carmichael Community Plan Land Use RD-2 (PQP)	X		
Sacramento County Land Use Zone City of Citrus Heights Zoning Code	RD-2	X		Consistent with use permit

INITIAL STUDY PREPARERS

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