City of
SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

ENVIRONMENTAL PLANNING
SERVICES

300 Richards Boulevard
Third Floor
Sacramento, CA 95811

MITIGATED NEGATIVE DECLARATION

The City of Sacramento, California, a municipal corporation, does hereby prepare, declare, and publish this Mitigated Negative Declaration for the following described project:

1143 Blumenfeld Cannabis Complex Project (Z21-027) The project consists of a request for a Conditional Use Permit to establish Cannabis Production (including cultivation, distribution and manufacturing) in both existing and proposed buildings totaling approximately 49,000 square feet, on approximately 2.56 acres in the Light Industrial Zone (M-1), and Site Plan and Design Review for two new commercial buildings totaling approximately 18,000 square feet and for the associated site development.

The Lead Agency is the City of Sacramento. The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that there is no substantial evidence that the project, as identified in the attached Initial Study, will have a significant effect on the environment. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. An Environmental Impact Report is not required pursuant to the Environmental Quality Act of 1970 (Sections 21000, et seq., Public Resources Code of the State of California).

This Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Sections 15000 et seq. of the California Code of Regulations), the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento, and the Sacramento City Code.

A copy of this document and all supportive is available on the City's EIR Webpage at:
http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports

Environmental Services Manager, City of Sacramento,
California, a municipal corporation

By: Ron Bess

Date: July 11, 2022

City of SACRAMENTO

BLUMENFELD CANNABIS COMPLEX (Z21-027)

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR ANTICIPATED SUBSEQUENT PROJECTS UNDER THE 2035 GENERAL PLAN MASTER EIR

This Initial Study has been prepared by the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811, pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations) and the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento.

ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into the following sections:

SECTION I – BACKGROUND: Provides summary background information about the project name, location, sponsor, and the date this Initial Study was completed.

SECTION II – PROJECT DESCRIPTION: Includes a detailed description of the proposed project.

SECTION III – ENVIRONMENTAL CHECKLIST AND DISCUSSION: Reviews proposed project and states whether the project would have additional significant environmental effects (project-specific effects) that were not evaluated in the Master EIR for the 2035 General Plan.

SECTION IV – ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Identifies which environmental factors were determined to have additional significant environmental effects.

SECTION V – DETERMINATION: States whether environmental effects associated with development of the proposed project are significant, and what, if any, added environmental documentation may be required.

REFERENCES CITED: Identifies source materials that have been consulted in the preparation of the Initial Study.

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SECTION I – BACKGROUND

Project Name and File Number:	Blumenfeld Cannabis Complex (Z21-027)
Project Location:	1143 Blumenfeld Drive Sacramento, CA 95815
Project Applicant:	Capitol Compliance Management c/o Kevin McCarty 701 12th Street Sacramento, CA 95814
Project Planner:	Robert Williams, Associate Planner, City of Sacramento
Environmental Planner:	Ron Bess, Associate Planner, City of Sacramento
Date Initial Study Completed:	May 2022

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 1500 *et seq.*). The Lead Agency is the City of Sacramento.

The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR and is consistent with the land use designation and the permissible densities and intensities of use for the project site as set forth in the 2035 General Plan. See CEQA Guidelines Section 15176 (b) and (d).

The City has prepared the attached Initial Study to review the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the 2035 General Plan Master EIR to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)) and identify any potential new or additional project-specific significant environmental effects that were not analyzed in the Master EIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects to a level of insignificance, if any.

As part of the Master EIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the Master EIR (CEQA Guidelines Section 15177(d)) Policies included in the 2035 General Plan that reduce significant impacts identified in the Master EIR are identified and discussed. See also the Master EIR for the 2035 General Plan. The mitigation monitoring plan for the 2035 General Plan, which provides references to applicable general plan policies that reduce the environmental effects of development that may occur consistent with the general plan, is included in the adopting resolution for the Master EIR.

The analysis contained in this IS/MND incorporates by reference the general discussion portions of the 2035 General Plan Master EIR. (CEQA Guidelines Section 15150(a)). The Master EIR and resolution is available for public review at the City of Sacramento's web site link listed below.

The City of Sacramento Community Development Department is located at 300 Richards Boulevard, Sacramento, CA 95811. The office is can be contacted at (916) 264-5011. A copy of this document and all supportive documentation may be reviewed through the City's website at:

http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports

The City of Sacramento will circulate a Notice of Availability/Notice of Intent (NOA/NOI) that confirms the City's intention to adopt the Mitigated Negative Declaration and provides dates for public comment. The NOA/NOI will be available on the City's website set forth above.

The City is soliciting views of interested persons and agencies on the content of the environmental information presented in this document. Written comments should be sent at the earliest possible date, but no later than the 30-day review period ending August 12, 2022

Please send written responses to:

Ron Bess, Associate Planner
Community Development Department
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811
Direct Line: (916) 808-8272
Rbess@cityofsacramento.org

SECTION II – PROJECT DESCRIPTION

INTRODUCTION

The applicant group is seeking a conditional use permit for the Blumenfeld Cannabis Complex (proposed project). This document provides a description of the proposed project and includes project location, project description, schedule, construction and operation information.

This Initial Study/Negative Declaration (IS/ND) was prepared pursuant to CEQA. This document was written for the proposed project for the purpose of determining whether the project may have a significant effect on the environment.

PROJECT LOCATION

The project is located in the Erickson Industrial Park area located off Arden Way in the Erickson Industrial Park area of north Sacramento, California (Exhibits 1 & 2). The approximately 2.56-acre site includes parcels identified by APNs 277-0241-019-0000, 277-0241-018-0000, 277-0241-017-0000, and 277-0241-016-0000.

PROJECT DESCRIPTION

The proposed project would involve the construction and operation of a cannabis cultivation, manufacturing, and distribution facility on the project site as a permitted use under the County's cannabis ordinances.

The project would make use of existing buildings on-site with the plan of remodeling the interior space to accommodate the entitlement use divisions. Table 1, shows the characteristics of each building and uses within the project site, and Table 2 provides a listing of the interior spaces and square footage of the interior that would be used for cannabis cultivation and related activities. A diagram of the Use Entitlement Areas can be found in Appendix D.

The new structures would be mixed light facilities using a combination of natural and supplemental artificial light to allow for the cultivation of cannabis. One of the new structures will be utilized solely for cultivation, while the other will include rooms for cultivation and manufacturing, as well as a business facility for distribution. The design of the mixed-light structures will feature secure walls resistant to penetration, and will be opaque to ensure that light emission to the exterior will be controlled as to not pose a nuisance to neighbors. These buildings will have and a roof that fit tightly and will be retrofitted with filtration systems so that odor emission is able to be effectively controlled.

The staff parking lot is located on the Northeast side of the property. Staff members utilize the secured gate entrance located on the Southeast side of the building. Clients and vendors have access to parking on the Northeast side of the building. The main entrance is located on the Northeast side of the building. Vendors will only be admitted to the facility by a qualified manager. All pick up and drop offs will be scheduled and take place in the secured loading area. The secured loading area entrance is located on the Southeast side of the property.

Table 1 Building and Project Site Areas

Project Components	Square Feet (acres)
Total Project Site	**111,578 (2.56)**
Total Building Footprint	**48,511**
Total Building including 2nd Floor Office	**52,372**
Existing Warehouse	23,112
Existing Office Footprint	6,144
Existing Second Floor Office	3,861
NEW Mixed Light Structure 1	9,167
NEW Mixed Light Structure 2	9,167
NEW Existing Storage	921

Table 2 Interior Cultivation and Use Entitlement Areas

Use Entitlement	Square Feet
Cultivation	
Nursery Cultivation	7,143
Vegetation/Clone Room	5,066
Flower Room	18,334
Ancillary and Product Storage	9,526
Cultivation Areas Total	40,069
Distribution Room	1,278
Manufacturing Room	1,020
Total Production	**42,367**

Operations Methodology – Cultivation

Cultivation of cannabis is defined by the DCC in Chapter 1, Article 1, § 15000 Definitions, as any activity involving the planting, growing, harvesting, drying, curing, grading, or trimming of cannabis. The applicant proposes to cultivate cannabis with both proposed buildings. Plants would begin the growth process in the vegetation and cloning rooms for the initial growth process then would be transferred to the flowering rooms to enable continued growth to maturity and until they are ready for harvesting. After harvesting, the plants would be transferred to the manufacturing room for drying and curing. Upon completion of this process, the plants would be weighted, packed, stored (as needed), until they were loaded for transportation and shipped to a licensed processing facility or licensed sales location.

Cultivation would use a hydroponic water system, and use growth medium such as clay pebbles, rockwool, coco base, perlite, or hybrid soil hydroponic. Use of this system encourages root development directly into the medium and would enable the addition of soil amendments in liquid form and more efficient delivery to plants and remove the demand for importation of soils and soil disposal. All fertilizers and nutrients would be clearly labelled and stored in secure areas and/or closets. Use of this type of system allows plants to mature quicker, provided the nutrients are properly managed and minimizes the potential for soil-borne diseases and pest-related issues, reducing the need for pesticides.

All pesticides, fertilizers, or other substances used in the cultivation process will be stored in original, labeled containers and kept securely within a mounted steel structure or containment locker to minimize the risk of any storage-related nutrient leaks. Each storage area and container will be lined at the base with a flood tray to capture any liquids in the event of accidental leaks. Large buckets of liquid nutrients will be stored on pallets at ground level to minimize the consequence of accidental spills. All open containers of nutrients will be stored in industrial grade catch pans to prevent spills from being released into other areas of the building or into the municipal water system. All pesticides, fertilizers, or other substances used in cultivation will be applied by means of a controlled distribution system using drip lines and nutrient injectors to minimize risk of accidental spills as well as maximize the water efficiency of the cultivation process (Appendix H page 23).

All wastewater generated during cultivation and operations will pass through a filtration system.

All plants being cultivated will be situated inside flood trays during cultivation to capture any water overflow. The flood trays drain through hoses connected to a central drainage system that removes contaminants by means of a filtration system before wastewater is released.

All municipal water used in cultivation is first purified through a reverse osmosis filtration system that produces a component of wastewater during operation that is then looped back into the water reservoir to be filtered again. The cultivation system utilizes a top-watering method in order to maximize water efficiency, as water that goes below root level is wasted. The system will utilize approximately 90% of the water coming into the facility for irrigation purposes with approximately 10% discharged as wastewater through the central drainage system via flood trays, hoses, and filters. The volume of water collected from dehumidifiers placed in cultivation rooms varies depending on ambient conditions, with a total ranging from 40 to 80 gallons per day including all cultivation rooms. The water is discharged from the humidifiers through hoses into the main reservoir to be recycled through the reverse osmosis filtration system and used in the cultivation process. A water meter and backflow prevention device will be installed at the point of initial entry to the facility to measure usage as well as ensure that nutrients are not released into the municipal water system (Appendix H page 23). Buildings used for cultivation will be retrofitted with air filtration systems so that odor emission is able to be effectively controlled.

Building Design and Use

Building improvements would include remodeling of the interior space of the existing warehouse structure to accommodate the entitlement use divisions. The project also includes construction of two new mixed-light structures consisting of metal Butler buildings and built with a translucent roof equipped with light deprivation curtains. The design of the mixed light structures would feature secure walls/envelope resistant to penetration and ensure that light emission to the exterior would be controlled so as to not pose a nuisance to neighbors. These buildings would have opaque walls and a hard roof that fits tightly and will be retrofitted with air filtration systems so that odor emission is able to be effectively controlled.

Site Access

Access to the site would be provided via a rolling gate for vendor and transport vehicle entry on the northeast side of the building. Staff members would utilize the secured gate entrance located on the southeast side of the building. Parking spaces along the northeast edge of the property would be relocated to the northeast side of the existing warehouse, and the remainder of the spaces would be waived/removed. The staff parking lot would be located on the northeast side of the property and clients and vendors would also have access to parking on the northeast side of the building.

Landscaping

The project would have a landscape allowing for clear, unobstructed views of surrounding areas to avoid creating entrapment areas. All mature landscaping would follow the two-foot, six-foot rule to define territory. All landscaping would be ground cover, two feet or less and lower tree canopies of mature trees would be above six feet. This would increase natural surveillance and eliminates hiding areas within the landscape. Tree canopies would not interfere with or block lighting. This would create shadows and areas of concealment. The landscaping plan would allow for proper visibility regarding lighting and surveillance cameras through the maturity of trees and shrubs.

Security and Lighting

This project would be equipped with and maintain a security system with an alarm system with a UL Certification in accordance with ANSI/AL Standard 681-2014 (Standard for installation and Classification of Burglar and Holdup Alarm), Extent Number 2. The alarm system would communicate with at least 24 hours of continued operation time in case of power failure. The alarm system would

include silent Holdup Buttons at Point of transport area, managers office, and safe(s), and a lobby that can be used if there is an immediate threat. Sacramento Police Department is the dispatch agency for Holdup Alarms. The manager would be able to respond to any alarm within one hour. All employees with access to the alarm system would be assigned individual alarm codes to arm/disarm the system. This facility would maintain a log of when the alarm system is armed and disarmed. The log would be maintained for a minimum of 90 days. The facility would be staffed at all times that the security system is not fully functional. Security Director, Hamlet Serobyan would be responsible for all security issues and building management issues on the property.

The facility would be equipped with a Video Assessment and Surveillance System (VASS). Cameras would be recorded at a minimum of 2MP (2048x1536) resolution, 15 Frames Per Second, except where camera placement allows for lower resolution cameras to provide adequate coverage (pixel per foot ratio to be taken into consideration). Cameras would record continuously 24 hours per day and all camera recordings would be maintained for a minimum of 90 days. Camera recordings would be kept on-site in a secured area only accessible to management. The surveillance-system storage device or the cameras would be transmission control protocol (TCP) capable of being accessed through the internet. The camera system would be maintained with a battery backup with at least 1 hour of stand-by time in case of power failures.

Exterior lighting shall be white light using LED lamps with full cutoff fixtures to limit glare and light trespass. Broken or damaged lighting shall be repaired or replaced within 48 hours of being noted. Exterior lighting shall be shielded or otherwise designed to avoid spill-over illumination to adjacent streets and properties (Appendix H page 17).

The design of the mixed-light structures will feature secure walls/envelope resistant to penetration and ensure that light emission to the exterior will be controlled so as to not pose a nuisance to neighbors. These buildings will have opaque walls and a hard roof that fits tightly.

Project Operation

After project startup, the site would be in continuous operation. Hours of operation of the proposed use would be 7 am to 7 pm.

Project Schedule

The project construction schedule anticipates approximately 4-6 months of construction design phase, with actual construction taking place over another 4-6 month time period concluding with issuance of a Certificate of Occupancy.

LAND USE, POPULATION AND HOUSING, AGRICULTURAL RESOURCES

Introduction

The California Environmental Quality Act (CEQA) requires the Lead Agency to examine the effects of a project on the physical conditions that exist within the area that would be affected by the project. CEQA also requires a discussion of any inconsistency between the proposed project and applicable general plans and regional plans.

An inconsistency between the proposed project and an adopted plan for land use development in a community would not constitute a physical change in the environment. When a project diverges from an adopted plan, however, it may affect planning in the community regarding infrastructure and services, and the new demands generated by the project may result in later physical changes in response to the project.

In the same manner, the fact that a project brings new people or demand for housing to a community does not, by itself, change the physical conditions. An increase in population may, however, generate changes in retail demand or demand for governmental services, and the demand for housing may generate new activity in residential development. Physical environmental impacts that could result from implementing the proposed project are discussed in the appropriate technical sections.

This section of the initial study identifies the applicable land use designations, plans and policies, and permissible densities and intensities of use, and discusses any inconsistencies between these plans and the proposed project. This section also discusses agricultural resources and the effect of the project on these resources.

Discussion

Land Use

The project site has been designated as urban center low in the 2035 General Plan and is zoned M-1 (light industrial).

The project site is located in an urbanized portion of the community. The project is in north Sacramento, located in the Erickson Industrial Park (Exhibit 3). The property is bordered on all sides by similarly zoned M-1 light industrial parcels. The property is surrounded by Kingston Contracting Inc. (1133 Blumenfeld Drive), C G Rail Signal Wiring, Inc., Blumenfeld Drive and Sears Outlet Store to the south and southeast; Niello Audi (1201 Blumenfeld Drive) to the east; Ellis and Ellis Sign Systems (1111 Joellis Way), and US Food (1025 Joellis Way) to the west and southwest; Cemex Joellis Way Ready Mix Plant (1001 Joellis Way) to the north and northwest; and the railroad to the north. The boundaries of the property are greater than 600 feet from any public or private K-12 school or any neighborhood or community park. The location, zoning and characteristics of the parcel make it ideal for use as a cannabis microbusiness facility complex encompassing cultivation, manufacturing, and distribution use entitlements.

Development of the site as proposed would alter the existing landscape, but the project site has been designated for urban development in the 2035 General Plan and the Planning and Development Code, and the proposed development is consistent with these planning designations.

Agricultural Resources

The Master EIR discussed the potential impact of development under the 2035 General Plan on agricultural resources. See Master EIR, Chapter 4.1. In addition to evaluating the effect of the general

plan on sites within the City, the Master EIR noted that to the extent the 2035 General Plan accommodates future growth within the City limits, the conversion of farmland outside the City limits is minimized. The Master EIR concluded that the impact of the 2035 General Plan on agricultural resources within the City was less than significant.

The proposed project site does not contain soils designated as Important Farmland (i.e., Prime Farmland, Unique Farmland or Farmland of Statewide Importance) (NRCS 2022) (Appendix N). The site is not zoned for agricultural uses, and there are no Williamson Act contracts that affect the project site. No existing agricultural or timber-harvest uses are located on or in the vicinity of the project site. Development of the site would result in no impacts on agricultural resources.

Wildfire

Pursuant to the CAL Fire and Resources Assessment Program (FRAP), the City of Sacramento is located within a Local Responsibility Area (LRA). The project site is not located within or adjacent to a designated Very High Fire Hazard Severity Zone (VHFHSZ) (CDFFP 2022). Furthermore, the project site is located within a developed area where substantial wildland-urban interface does not exist. Thus, the risk of wildfire at the project site is minimal. The Master EIR does not identify any significant impacts related to wildfire risk. Based on the above, the proposed project would not create a substantial fire risk for existing development in the project vicinity. Therefore, the project would not have a significant impact related to Wildfire.

AESTHETICS

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
1. AESTHETICS Would the project:			
A) Create a source of glare that would cause a public hazard or annoyance?			✓
B) Create a source of glare that would cause a public hazard or annoyance?			✓
C) Create a source of glare that would cause a public hazard or annoyance?			✓

Environmental Setting

The vicinity of the project site consists of light industrial development. The project is bordered on all sides by similarly zoned M-1 light industrial parcels. The location, zoning, and characteristics of the parcel are consistent with use as a *Cannabis* microbusiness facility complex encompassing cultivation, manufacturing, and distribution use entitlements.

The project would involve building improvements including remodeling of the interior space of the existing warehouse structure to accommodate the entitlement use divisions. The project would include construction of two mixed-light structures consisting of metal Butler buildings and build with a translucent roof equipped with light deprivation curtains. The design of the mixed-light structures will feature secure walls/envelope resistant to penetration and ensure that light emission to the exterior will be controlled so as to not pose a nuisance to neighbors. The project would not change the visual character of the area.

Standards of Significance

The significance criteria used to evaluate the project impacts to aesthetics are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines, thresholds of significance adopted by the City in applicable general plans and previous environmental documents, and professional judgment. A significant impact related to aesthetics would occur if the project would:

- substantially interfere with an important scenic resource or substantially degrade the view of an existing scenic resource; or
- create a new source of substantial light or glare that is substantially greater than typical urban sources and could cause sustained annoyance or hazard for nearby sensitive receptors.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR described the existing visual conditions in the general plan City of Sacramento, and the potential changes to those conditions that could result from development consistent with the 2035 General Plan. See Master EIR, Chapter 4.13, Visual Resources.

The Master EIR identified potential impacts for light and glare (Impact 4.13-1) and concluded that impacts would be less than significant.

Answers to Checklist Questions

A) Create a source of glare that would cause a public hazard or annoyance?

No impact. The proposed project is located within the Erickson Industrial Park area of North Sacramento. It is surrounded by similar industrial-use properties and would not create a new source of glare that exceeds the existing glare from surrounding properties. Lighting features of the proposed project include the use of LED lighting indoors to facilitate the indoor growth of cannabis. As discussed in the project description, exterior lighting will use LED lighting that is shielded or designed to avoid spill-over illumination to adjacent streets and properties. All lighting used for plants would be contained within fully enclosed buildings. The structures will have no windows to prevent light leakage. The building roofs will be transparent but spill light from this source would be minimal. Therefore, no impacts would occur, and no mitigation is necessary.

B) Create a new source of light that would be cast onto oncoming traffic or residential uses?

No impact. The proposed project is located within the Erickson Industrial Park area of North Sacramento. The nearest residential dwellings are located 0.8 miles from the proposed project site. The project site is surrounded by similar light industrial-use properties and would not create a new source of light that exceeds the existing light sources from surrounding properties. Lighting features of the proposed project include the use of LED lighting indoors to facilitate the indoor growth of cannabis. As discussed in the project description, exterior lighting will use LED lighting that is shielded or designed to avoid spill-over illumination to adjacent streets and properties. All lighting used for plants would be contained within fully enclosed buildings. The structures will have no windows to prevent light leakage. The building roofs will be transparent but spill light from this source would be minimal. Therefore, no impacts would occur, and no mitigation is necessary.

C) Substantially degrade the visual character or quality of the site and its surroundings?

No impact. The subject property and existing buildings will remain and be used as-is. The two new mixed-light structures will be constructed from the same materials as the existing exterior buildings. As a result, the proposed project will not degrade existing visual character or quality of the site and its surroundings. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Aesthetics.

AIR QUALITY

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
2. AIR QUALITY Would the project:			
A) Result in construction emissions of NO_x above 85 pounds per day?			✓
B) Result in operation emissions of NO_x or ROG above 65 pounds per day?			✓
C) Violate any air quality standard or have a cumulatively considerable contribution to an existing or projected air quality violation?			✓
D) Result in PM_{10} and $PM_{2.5}$ concentrations that exceed SAMQMD requirements?		✓	
E) Result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm)?			✓
F) Result in exposure of sensitive receptors to substantial pollutant concentrations?			✓
G) Result in TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources?			✓

Environmental Setting

The City of Sacramento is located within the Sacramento Valley Air Basin (SVAB), which is a valley bounded by the North Coast Mountain Ranges to the west and the Northern Sierra Nevada Mountains to the east. The terrain in the valley is flat and approximately 25 feet above sea level.

Hot, dry summers and mild, rainy winters characterize the Mediterranean climate of the Sacramento Valley. Throughout the year, daily temperatures may range by 20 degrees Fahrenheit with summer highs often exceeding 100 degrees and winter lows occasionally below freezing. Average annual rainfall is about 20 inches and snowfall is very rare. Summertime temperatures are normally moderated by the presence of the "Delta breeze" that arrives through the Carquinez Strait in the evening hours.

The mountains surrounding the SVAB create a barrier to airflow, which can trap air pollutants in the valley. The highest frequency of air stagnation occurs in the autumn and early winter when large high-pressure cells lie over the valley. The lack of surface wind during these periods and the reduced vertical flow caused by less surface heating reduces the influx of outside air and allows air pollutants to become concentrated in a stable volume of air. The surface concentrations of pollutants are highest when these conditions are combined with temperature inversions that trap cooler air and pollutants near the ground.

The warmer months in the SVAB (May through October) are characterized by stagnant morning air or light winds, and the Delta breeze that arrives in the evening out of the southwest. Usually, the evening breeze transports a portion of airborne pollutants to the north and out of the Sacramento Valley. During about half of the day from July to September, however, a phenomenon called the "Schultz Eddy" prevents this from occurring. Instead of allowing the prevailing wind patterns to move north carrying the pollutants out of the valley, the Schultz Eddy causes the wind pattern to circle back south. This phenomenon exacerbates the pollution levels in the area and increases the likelihood of violating Federal or State standards. The Schultz Eddy normally dissipates around noon when the Delta breeze begins.

Criteria Air Pollutants

Concentrations of emissions from criteria air pollutants (the most prevalent air pollutants known to be harmful to human health) are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$), and lead. The Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds of significance for criteria air pollutants are shown in Appendix J. The sources of criteria air pollutants and their respective acute and chronic health impacts are described in Table 3.

Table 3 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute[1] Health Effects	Chronic[2] Health Effects
Ozone	Secondary pollutant resulting from reaction of ROG and NO_X in presence of sunlight. ROG emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels	Increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	Permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide (CO)	Incomplete combustion of fuels; motor vehicle exhaust	Headache, dizziness, fatigue, nausea, vomiting, death	Permanent heart and brain damage
Nitrogen dioxide (NO_2)	Combustion devices; e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines	Coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	Chronic bronchitis, decreased lung function
Sulfur dioxide (SO_2)	Coal and oil combustion, steel mills, refineries, and pulp and paper mills	Irritation of upper respiratory tract, increased asthma symptoms	Insufficient evidence linking SO2 exposure to chronic health impacts
Respirable particulate matter (PM_{10}), Fine particulate matter ($PM_{2.5}$)	Fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the Atmosphere by condensation and/or transformation of SO2 and ROG	Breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, Premature death	Alterations to the immune system, carcinogenesis
Lead	Metal processing	Reproductive/developmental effects (fetuses and children)	Numerous effects including neurological, endocrine, and cardiovascular effects

NOTES: NO_X = oxides of nitrogen; ROG = reactive organic gases.
[1]"Acute" refers to effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.
[2]"Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.
SOURCE: EPA 2018

Existing Air Quality

The U.S. Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. EPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970 and most recently amended by Congress in 1990. The CAA required EPA to establish the National Ambient Air Quality Standards (NAAQS) for the following criteria air pollutants: ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. CAA also requires each State to prepare a State implementation plan (SIP) for attaining and maintaining the NAAQS. The federal Clean Air Act Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. Individual SIPs are modified

periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies.

The California Air Resources Board (CARB) is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, required CARB to establish its own California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. In most cases the CAAQS are more stringent than the NAAQS.

The SVAB is currently designated as nonattainment for the NAAQS 8-hour ozone standard and the CAAQS for both 1-hour and 8-hour O_3 standard. The SVAB is also currently designated as nonattainment for both NAAQS and CAAQS 24-hour PM_{10} standards. In addition, the SVAB is currently designated as nonattainment for the NAAQS 24-hour $PM_{2.5}$ standard. The air basin is designated as unclassified or in attainment for the remaining criteria air pollutants (SMAQMD 2020).

Toxic Air Contaminants

According to the California Almanac of Emissions and Air Quality (CARB 2013), the majority of the estimated health risks from toxic air contaminants (TACs) can be attributed to relatively few compounds, the most important being diesel particulate matter (diesel PM). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

Sensitive Receptors

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants. The closest sensitive receptors to the project site include Childtime of Sacramento (3.9 miles), Jefferson school (5.1 miles), Fremont Park Playground (5.5 miles), Mercy General Hospital (4.7 miles), D.W. Babcock Elementary School (1.9 miles), and residential dwellings that begin 0.8 miles from the proposed project site.

Standards of Significance

For purposes of this Initial Study, air quality impacts may be considered significant if construction and/or implementation of the proposed project would result in the following impacts that remain significant after implementation of 2035 General Plan policies:

- Construction emissions of NOx above 85 pounds per day;
- Operational emissions of NOx or ROG above 65 pounds per day;
- Violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- Any increase in PM_{10} concentrations, unless all feasible Best Available Control Technology (BACT) and Best Management Practices (BMPs) have been applied, then increases above 80 pounds per day or 14.6 tons per year;

- CO concentrations that exceed the 1-hour State ambient air quality standard (i.e., 20.0 ppm) or the 8-hour State ambient standard (i.e., 9.0 ppm); or
- Exposure of sensitive receptors to substantial pollutant concentrations.

Ambient air quality standards have not been established for toxic air contaminants (TAC). TAC exposure is deemed to be significant if:

- TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR addressed the potential effects of the 2035 General Plan on ambient air quality and the potential for exposure of people, especially sensitive receptors such as children or the elderly, to unhealthful pollutant concentrations. See Master EIR, Chapter 4.2.

Policies in the 2035 General Plan in Environmental Resources were identified as mitigating potential effects of development that could occur under the 2035 General Plan. For example, Policy ER 6.1.1 calls for the City to work with the California Air Resources Board and the SMAQMD to meet state and federal air quality standards; Policy ER 6.1.2 requires the City to review proposed development projects to ensure that the projects incorporate feasible measures that reduce construction and operational emissions; Policy ER 6.1.4 and ER 6.1.11 calls for coordination of City efforts with SMAQMD; and Policy ER 6.1.15 requires the City to give preference to contractors using reduced-emission equipment.

The Master EIR identified exposure to sources of toxic air contaminants (TAC) as a potential effect. Policies in the 2035 General Plan would reduce the effect to a less-than-significant level. The policies include ER 6.1.4, requiring coordination with SMAQMD in evaluating exposure of sensitive receptors to TACs, and impose appropriate conditions on projects to protect public health and safety; as well as Policy LU 2.7.5 requiring extensive landscaping and trees along freeways fronting elevation and design elements that provide proper filtering, ventilation, and exhaust of vehicle air emissions from buildings.

Answers to Checklist Questions

Result in construction emissions of NO_x above 85 pounds per day?

No impact. The California Emissions Estimator Model (CalEEMod) was used to calculate maximum daily emission of criteria air pollutants during construction of the proposed project. The maximum daily emission of NO_x for the proposed project during construction is 17.0061 lb/day shown in the CalEEMod Emissions Summary (Appendix K page 1). This is below the SMAQMD thresholds of significance. Therefore, no impact would occur, and no mitigation is necessary.

B) Result in operational emissions of NO_x or ROG above 65 pounds per day?

No impact. The California Emissions Estimator Model (CalEEMod) was used to calculate maximum daily emission of criteria air pollutants during operation of the proposed project. The total daily emission of NO_x for the proposed project operations is 4.1011 lb/day and total ROG of 4.8258 lb/day as shown in the CalEEMod Emissions Summary (Appendix K page 2). This is below the SMAQMD thresholds of significance (Appendix J). Therefore, no impact would occur, and no mitigation is necessary.

C) Violate any air quality standard or have a cumulatively considerable contribution to an existing or projected air quality violation?

No impact. The proposed project's maximum daily emissions of criteria air pollutants during construction and operation are shown in Appendix K. All of these projected emissions are within the SMAQMD thresholds of significance (Appendix J). Therefore, no impact would occur, and no mitigation is necessary.

D) Result in PM_{10} and $PM_{2.5}$ concentrations that exceed SAMQMD requirements?

No impact. Based on the CalEEMod model, construction PM_{10} and $PM_{2.5}$ total emissions are 7.9014 lb/day and 4.1282 lb/day, respectively. Operational PM_{10} and $PM_{2.5}$ total emissions are 4.3084 lb/day and 1.2303 lb/day, respectively (Appendix K). The SMAQMD thresholds are 0 lb/day for both PM_{10} and $PM_{2.5}$. However, the SMAQMD Thresholds of Significance Table states that if all feasible BACT/BMP's are applied, then construction and operational PM_{10} and $PM_{2.5}$ total emissions can be 80 lb/day and 82 lb/day respectively (Appendix J). The proposed project will subject to the applicable SMAQMD construction and operational BACTSs and BMPs (Appendix L and Appendix M) through the implementation of Mitigation Measure AQ-1. With the implementation of the BACTS and BMPs, the project would result in a less-than-significant effect for PM emissions

E) Result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm)?

No impact. The proposed project's maximum daily emissions of criteria air pollutants during construction and operation are shown in Appendix K. All of these projected emissions are within the SMAQMD thresholds of significance (Appendix J). Therefore, no impact would occur, and no mitigation is necessary.

F) Result in exposure of sensitive receptors to substantial pollutant concentrations?

No impact. The nearest sensitive receptor is residential dwellings (0.8 miles). Projected pollutant concentrations from CalEEMod (Appendix K) show that the proposed project will be within SMAQMD's thresholds of significance (Appendix J). Therefore, no impact would occur, and no mitigation is necessary.

G) Result in TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources?

No impact. The list of TACs include, but are not limited to asbestos, acetaldehyde, chloroform, methylene chloride, naphthalene, vinyl chloride, etc. (OEHHA 2022). The possibility of asbestos containing materials in the existing office building is medium according to the Transaction Screen Assessment (Appendix G). However, the office building will remain and be used as-is, so there is no risk of introducing asbestos to the environment. The proposed project will make use of certain hazardous materials for cultivation operations listed in the Hazardous Material Inventory Statement (Appendix C). None of the hazardous materials used during operations of the proposed project are considered TACs. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

Mitigation Measure AQ-1: Implement SMAQMD Best Management Practices for construction and operation:

The project shall implement the following required best management practices to control fugitive dust from project construction activities.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways shall be covered.
- Use wet power vacuum street sweepers to remove any visible track-out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour.
- All roadways, driveways, sidewalks, parking lots to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.
- Maintain equipment inspection and maintenance programs to ensure work and fuel efficiencies.

The following list identifies the BMPs for operational PM emissions for land use development projects:

1. Compliance with District rules that control operational PM and NOx emissions. Reference rules regarding wood burning devices, boilers, water heaters, generators and other PM control rules that may apply to equipment to be located at the project. Current rules can be found on the District's website:

http://www.airquality.org/Businesses/Rules-Regulations

2. Compliance with mandatory measures in the California Building Energy Efficiency Standards (Title 24, Part 6) that pertain to efficient use of energy at a residential or non-residential land use. The current standards can be found on the California Energy Commission's website:

http://www.energy.ca.gov/title24/

3. Compliance with mandatory measures in the California Green Building Code (Title 24, Part 11). The California Building Standards Commission provides

helpful links on its website:

https://www.dgs.ca.gov/BSC/Resources/Page- Content/Building-Standards-Commission-Resources-List- Folder/CALGreen

Current mandatory measures related to operational PM include requirements for bicycle parking, parking for fuel efficient vehicles, electric vehicle charging, and fireplaces for non-residential

projects. Residential project measures include requirements for electric vehicle charging and fireplaces.

4. Compliance with anti-idling regulations for diesel powered commercial motor vehicles (greater than 10,000 gross vehicular weight rating). This BMP focuses on non-residential land use projects (retail and industrial) that would attract these vehicles. The current requirements include limiting idling time to 5 minutes and installing technologies on the vehicles that support anti-idling. Information can be found on the California Air Resources Board's website:

https://ww2.arb.ca.gov/our-work/programs/idle-reduction-technologies/idle-reduction-technologies.

Findings

With the implementation of Mitigation Measure AQ-1,the project would have no additional project-specific environmental effects relating to Air Quality.

BIOLOGICAL RESOURCES

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
3. BIOLOGICAL RESOURCES Would the project:			
A) Create a potential health hazard or use, production, or disposal of materials that would pose a hazard to plant or animal populations in the area affected?			✓
B) Result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal species?			✓
C) Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands)?			✓

Environmental Setting

Prior to human development, the natural habitats within the region included perennial grasslands, riparian woodlands, oak woodlands, and a variety of wetlands including vernal pools, seasonal wetlands, freshwater marshes, ponds, streams, and rivers. Over the last 150 years, agriculture, irrigation, flood control, and urbanization have resulted in the loss or alteration of much of the natural habitat within the City limits. Non-native annual grasses have replaced the native perennial grasslands, many of the natural streams have been channelized, much of the riparian and oak woodlands have been cleared, and most of the marshes have been drained and converted to agricultural or urban uses.

Though the majority of the City is developed with residential, commercial, and other urban development, valuable plant and wildlife habitat still exists. These natural habitats are located primarily outside the city boundaries in the northern, southern and eastern portions of the City, but also occur along river and stream corridors and on a number of undeveloped parcels. Habitats that are present in the City include annual grasslands, riparian woodlands, oak woodlands, riverine, ponds, freshwater marshes, seasonal wetlands, and vernal pools. These habitats and their general locations are discussed briefly below.

Existing Conditions

The project is within the Sacramento North, California, U.S. Geological Survey (USGS) 7.5-Minute Topographic Quadrangle. The American River is located approximately 0.92 miles to the southwest and the Sacramento River is located approximately 3.71 miles to the west. Average annual precipitation is about 17.8 inches; most precipitation falls between November and March.

The project is located in north Sacramento, California, and is generally bound on all sides by industrial development. As a result of past development, natural habitat and associated plant and wildlife species have been extirpated from the area. There are no sensitive wetland features or natural environments within the project corridor.

The biological setting characterization is based on information gathered from the U.S. Fish and Wildlife Service's (USFWS) database Information for Planning and Conservation (IPaC) and the California Natural Diversity Database (CNDDB) for the Sacramento East, Sacramento West, Taylor Monument , Rio Linda, Citrus Heights, Carmichael, Elk Grove, Florin, and Clarksburg USGS 7.5 Minute Quadrangles. A list of federally endangered or threatened species was generated by the USFWS IPaC (see Appendix A). The special-status species list is summarized in Appendix A.

General Plants

The habitat adjacent to the project is developed. Vegetation in the area is limited to landscaped trees and shrubs. Development has removed natural plant communities.

Special-Status Plant Species

Three special-status plants were identified in the CNDDB and USFWS search for Sacramento East and the eight surrounding 7 ½ minute quadrangles (see Appendix A). Sacramento Orcutt grass (*Orcuttia viscida*) and slender Orcutt grass (*Orcuttia tenuis*) are commonly found in vernal pools. Boggs lake hedge-hyssop (*Gratiola heterosepala*) is commonly found in freshwater marches and swamps as well as vernal pools. Because of the lack of vernal pools or wetland features in the project site, these species are not likely to occur.

General Wildlife

Development has extirpated many common wildlife species from the area. Ornamental trees in the area can provide foraging and roosting habitat for bird species.

Special-Status Wildlife Species

Fifteen special-status wildlife species were identified in the CNDDB and IPaC search for Sacramento East and the eight surrounding 7 ½ minute quadrangles (see Appendix A). None of these species are likely to occur on the project site because of a lack of suitable habitat. 8 migratory birds of concern were identified in the IPaC. The project site is lacking suitable trees for nesting and foraging habitat. Therefore, no migratory birds of concern are expected to occur or be affected in the project area.

Site Visit

A site visit was conducted on May 23, 2022. Existing vegetation consisted of multiple *Cupressus sempervirens* (Italian cypress), one *Pinus sp.* (pine), and multiple *Ailanthus altissima* (tree of Heaven). Landscaped plants around existing buildings on-site consisted of multiple *Cordyline sp.* and one *Acer platanoides* (Norway maple; 'Crimson King' cultivar). The site contains existing buildings and the

grounds are asphalt. The site visit confirms that there is no suitable habitat for special-status biological resources.

Standards of Significance

For purposes of this environmental document, an impact would be significant if any of the following conditions or potential thereof, would result with implementation of the proposed project:

- Creation of a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected;
- Substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal; or
- Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands).

For the purposes of this document, "special-status" has been defined to include those species, which are:

- Listed as endangered or threatened under the federal Endangered Species Act (or formally proposed for, or candidates for, listing);
- Listed as endangered or threatened under the California Endangered Species Act (or proposed for listing);
- Designated as endangered or rare, pursuant to California Fish and Game Code (Section 1901);
- Designated as fully protected, pursuant to California Fish and Game Code (Section 3511, 4700, or 5050);
- Designated as species of concern by U.S. Fish and Wildlife Service (USFWS), or as species of special concern to California Department of Fish and Game (CDFG);
- Plants or animals that meet the definition of rare or endangered under the California Environmental Quality Act (CEQA).

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.3 of the Master EIR evaluated the effects of the 2035 General Plan on biological resources within the City. The Master EIR identified potential impacts in terms of degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status birds, through the loss of both nesting and foraging habitat.

Policies in the 2035 General Plan were identified as mitigating the effects of development that could occur under the provisions of the 2035 General Plan.

- Policy ER 2.1.5 calls for the City to preserve the ecological integrity of creek corridors and other riparian resources;
- Policy ER 2.1.10 requires the City to consider the potential impact on sensitive plants for each project and to require pre-construction surveys when appropriate; and
- Policy ER 2.1.11 requires the City to coordinate its actions with those of the California Department Fish and Wildlife, U.S. Fish and Wildlife Service, and other agencies in the protection of resources.

The Master EIR discussed biological resources in Chapter 4.3. The Master EIR concluded that policies in the general plan, combined with compliance with the California Endangered Species Act, Natomas Basin HCP (when applicable) and CEQA would minimize the impacts on special-status species to a less-than-significant level (see Impact 4.3-1), and that the general plan policies, along with similar compliance with

local, state and federal regulation would reduce impacts to a less-than-significant level for habitat for special-status invertebrates, birds, amphibians and reptiles, mammals and fish (Impacts 4.3-3-6).

Given the prevalence of rivers and streams in the incorporated area, impacts to riparian habitat is a common concern. Riparian habitats are known to exist throughout the City, especially along the Sacramento and American rivers and their tributaries. The Master EIR discussed impacts of development adjacent to riparian habitat that could disturb wildlife species that rely on these areas for shelter and food, and could also result in the degradation of these areas through the introduction of feral animals and contaminants that are typical of urban uses. The California Department of Fish and Wildlife (CDFW) regulates potential impacts on lakes, streams, and associated riparian (streamside or lakeside) vegetation through the issuance of Lake or Streambed Alteration Agreements (SAA) (per Fish and Game Code Section 1602), and provides guidance to the City as a resource agency. While there are no federal regulations that specifically mandate the protection of riparian vegetation, federal regulations set forth in Section 404 of the Clean Water Act address areas that potentially contain riparian-type vegetation, such as wetlands.

The general plan calls for the City to preserve the ecological integrity of creek corridors, canals and drainage ditches that support riparian resources (Policy ER 2.1.5) and wetlands (Policy ER 2.1.6) and requires habitat assessments and impact compensation for projects (Policy ER 2.1.10). has adopted a standard that requires coordination with state and federal agencies if a project has the potential to affect other species of special concern or habitats (including regulatory waters and wetlands) protected by agencies or natural resource organizations (Policy 2.1.11).

Implementation of 2035 General Plan Policy ER 2.1.5 would reduce the magnitude of potential impacts by requiring a 1:1 replacement of riparian habitat lost to development. While this would help mitigate impacts on riparian habitat, large open areas of riparian habitat used by wildlife could be lost and/or degraded directly and indirectly through development under the 2035 General Plan. Given the extent of urban development designated in the general plan, the preservation and/or restoration of riparian habitat would likely occur outside of the City limits. The Master EIR concluded that the permanent loss of riparian habitat would be a less-than-significant impact. (Impact 4.3-7)

Answers to Checklist Questions

A) Create a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected?

No impact. The proposed project has put a waste management plan in place to ensure the proper use of hazardous materials and generation, accumulation, disposal, and record keeping of hazardous waste. The waste and hazardous materials identified in the waste management plan include, but are not limited to batteries, pesticides, thermostats, thermometers, fluorescent and other mercury containing lamps, aerosol cans, and cannabis waste (Appendix E), With this waste management plan in place, no impact would occur, and no mitigation is necessary.

B) Result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal species?

No impact. The project site does not contain suitable habitat to support the species of concern that have the potential to be present in the project area and would not have an adverse effect on them (Appendix A). Therefore, no impact would occur, and no mitigation is necessary.

C) Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands)?

No impact. The project would not have an adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act as the site does not contain any of these features. The closest recognized wetland is approximately 0.25 miles northwest of the project site (Appendix F). Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Biological Resources.

CULTURAL RESOURCES

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
4. CULTURAL RESOURCES Would the project:			
A) Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in § 15064.5?			✓
B) Directly or indirectly destroy a unique paleontological resource?			✓
C) Disturb any human remains?			✓

Environmental Setting

The City of Sacramento and the surrounding area are known to have been occupied by Native American groups for thousands of years prior to settlement by non-Native peoples. Archaeological materials, including human burials, have been found throughout the city, some in deeply buried contexts. One of the tools used to identify the potential for cultural resources to be present in the project area is the 2035 General Plan Background Report. Generalized areas of high sensitivity for cultural resources are located within close proximity to the Sacramento and American Rivers and moderate sensitivity was identified near other watercourses. The proposed project site is not adjacent to these high or moderate sensitivity units shown in the 2035 General Plan Background Report.

The 2035 General Plan land use diagram designates a wide swath of land along the American River as Parks, which limits development and impacts on sensitive cultural resources. High sensitivity areas may be found in other areas related to the ancient flows of the rivers, with differing meanders than found today. Recent discoveries during infill construction in downtown Sacramento have shown that the downtown area is highly sensitive for both historic- and pre contact indigenous resources. Native American burials and artifacts were found in 2005 during construction of the New City Hall and historic period archaeological resources are abundant downtown due to the evolving development of the area and, in part, to the raising of the surface street level in the 1860s and 1870s, which created basements out of the first floors of many buildings.

Standards of Significance

For purposes of this Initial Study, cultural resource impacts may be considered significant if construction and/or implementation of the proposed project would result in one or more of the following:

- Cause a substantial change in the significance of a historical or archaeological resource as defined in CEQA Guidelines Section 15064.5; or
- Directly or indirectly destroy a unique paleontological resource; or
- A substantial adverse change in the significance of such resources.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.4 of the Master EIR evaluated the potential effects of development under the 2035 General Plan on prehistoric and historic resources.

General plan policies identified as reducing such effects call for identification of resources on project sites (Policy HCR 2.1.1), implementation of applicable laws and regulations (Policy HCR 2.1.2), early

consultation with owners and land developers to minimize effects (Policy HCR 2.1.10) and encouragement of adaptive reuse of historic resources (Policy HCR 2.1.14). Demolition of historic resources is deemed a last resort. (Policy HCR 2.1.15)

The Master EIR concluded that implementation of the 2035 General Plan would have a significant and unavoidable effect on historic resources and archaeological resources. (Impacts 4.4-1, 2)

Answers to Checklist Questions

A) Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in § 15064.5?

No impact. The proposed project property is in an industrial park and the property has been previously used for light industrial use. The proposed use of this property is similar to that which preceded it. Construction activities proposed in this project would not involve ground disturbing activities or demolition of existing buildings and structures. Thus, the proposed project would not create an adverse change in the significance of a historical or archaeological resource. Therefore, no impact would occur, and no mitigation is necessary.

B) Directly or indirectly destroy a unique paleontological resource?

No impact. The proposed project would make use of existing buildings on the property and involve the construction of two new structures. However, construction will not involve ground disturbing activities and would not cause a substantial adverse change in the significance of a paleontological resource. Therefore, no impact would occur, and no mitigation is necessary.

C) Disturb any human remains?

No impact. The proposed project would make use of existing buildings on the property and involve the construction of two new structures. However, construction will not involve ground disturbing activities and would not cause disturbance to any human remains. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Cultural Resources.

ENERGY

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
5. ENERGY Would the project:			
A) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?			✓
B) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓

Structures built would be subject to Titles 20 and 24 of the California Code of Regulations, which reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. The 2035 General Plan includes policies (see 2035 General Plan Energy Resources Goal U 6.1.1) and related policies to encourage energy-efficient technology by offering rebates and other incentives to commercial and residential developers, coordination with local utility providers and recruitment of businesses that research and promote energy conservation and efficiency.

The Master EIR discussed energy conservation and relevant general plan policies in section 6.3 (page 6-3). The discussion concluded that with implementation of the general plan policies and energy regulation (e.g., Title 24) development allowed in the general plan would not result in the inefficient, wasteful or unnecessary consumption of energy.

See also Section 12, below, discussing impacts related to energy. The Master EIR concluded that implementation of state regulation, coordination with energy providers and implementation of general plan policies would reduce the potential impacts from construction of new energy production or transmission facilities to a less-than-significant level.

Environmental and Regulatory Setting

Sacramento Municipal Utility District (SMUD) is a community-owned and not-for-profit utility that provides electric services to 900 square miles, including most of Sacramento County (SMUD 2020). Pacific Gas and Electric (PG&E) is an inventory-owned utility that provides electric and natural gas services to approximately 16 million people within a 70,000-square-mile service area in both northern and central California (PG&E 2020). SMUD is the primary electricity supplier, and PG&E is the primary natural gas supplier for the City of Sacramento and the project area.

Energy demand related to the proposed project would include energy directly consumed for space heating and cooling and proposed electric facilities and lighting. Indirect energy consumption would be associated with the generation of electricity at power plants. Transportation-related energy consumption includes the use of fuels and electricity to power cars, trucks, and public transportation. Energy would also be consumed by equipment and vehicles used during project construction and routine maintenance activities.

Energy Policy and Conservation Act, and CAFE Standards

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Under this act, the National Highway Traffic and Safety Administration, is responsible for revising existing fuel economy standards and establishing new vehicle economy standards. The Corporate Average Fuel Economy program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Three Energy Policy Acts have been passed, in 1992, 2005, and

2007, to reduce dependence on foreign petroleum, provide tax incentives for alternative fuels, and support energy conservation.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. EPAct requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

State of California Energy Efficiency Action Plan

The 2019 California Energy Efficiency Action Plan has three primary goals for the state: double energy efficiency savings by 2030 relative to a 2015 base year (per SB 350), expand energy efficiency in low-income and disadvantaged communities, and reduce greenhouse gas emissions from buildings. This plan provides guiding principles and recommendations on how the state would achieve those goals. These recommendations include:

- identifying funding sources that support energy efficiency programs,
- identifying opportunities to improve energy efficiency through data analysis,
- using program designs as a way to encourage increased energy efficiency on the consumer end,
- improving energy efficiency through workforce education and training, and
- supporting rulemaking and programs that incorporate energy demand flexibility and building decarbonization. (CEC 2019)

California Green Building Standards

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions.

The 2019 California Energy Code was adopted by CEC on May 9, 2018 and applies to projects constructed after January 1, 2020. The 2019 California Energy Code is designed to move the State closer to its zero-net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the electricity needs of each residential unit (California Code of Regulations (CCR), Title 24, Part 6, Section 150.1(c)4). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively required energy efficiency standards will result in a 53 percent reduction in new residential construction as compared to the 2016 California Energy Code. Non-residential buildings are anticipated to reduce energy consumption by 30 percent as compared to the 2016 California Energy Code primarily through prescriptive requirements for high-efficiency lighting (CEC 2018). The Energy Code is enforced through the local plan check and building permit process.

Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

Transportation-Related Regulations

Various regulatory and planning efforts are aimed at reducing dependency on fossil fuels, increasing the use of alternative fuels, and improving California's vehicle fleet. Senate Bill (SB) 375 aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. CARB, in consultation with the metropolitan planning organizations, provides each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035.

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), CEC and the CARB prepared and adopted a joint agency report in 2003, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003).

AB 1007 (Chapter 371, Statues of 2005) required CEC to prepare the State Alternative Fuels Plan to increase the use of alternative fuels in California.

In January 2012, CARB approved the Advanced Clean Cars program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The program's zero-emission vehicle regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025.

On August 2, 2018, the National Highway Traffic Safety Administration (NHTSA and EPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). Part One of the SAFE Rule revokes a waiver granted by EPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by EPA for the explicit purpose of GHG emission reduction, and indirectly, criteria air pollutant and ozone precursor emission reduction. On March 31, 2020, Part Two of the SAFE Rule was published and would amend existing CAFE and tailpipe CO_2 emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026.

GHG Reduction Regulations

Several regulatory measures such as AB 32 and the Climate Change Scoping Plan, EO B-30-15, SB 32, and AB 197 were enacted to reduce GHGs and have the co-benefit of reducing California's dependency on fossil fuels and making land use development and transportation systems more energy efficient.

Renewable Energy Regulations

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond.

SB 100, signed in September 2018, requires that all California utilities, including independently-owned utilities, energy service providers, and community choice aggregators, supply 44 percent of retail sales from renewable resources by December 31, 2024, 50 percent of all electricity sold by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The law also requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020—an increase in fuel economy standards of 40 percent.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the Energy Policy Act of 2005 in setting out a comprehensive national energy strategy for the 21st century.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Structures built would be subject to Titles 20 and 24 of the California Code of Regulations, which reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. The 2035 General Plan includes policies (see 2035 General Plan Energy Resources Goal U 6.1.1) and related policies to encourage energy-efficient technology by offering rebates and other incentives to commercial and residential developers, coordination with local utility providers and recruitment of businesses that research and promote energy conservation and efficiency.

The Master EIR discussed energy conservation and relevant General Plan policies in section 6.3 (page 6-3). The discussion concluded that with implementation of the General Plan policies and energy regulation (e.g., Title 24) development allowed in the General Plan would not result in the inefficient, wasteful or unnecessary consumption of energy.

See also Section 12, below, discussing impacts related to energy. The Master EIR concluded that implementation of state regulation, coordination with energy providers and implementation of General Plan policies would reduce the potential impacts from construction of new energy production or transmission facilities to a less-than-significant level.

Sacramento Climate Action Plan

The Sacramento CAP was adopted on February 14, 2012 by the Sacramento City Council and was incorporated into the 2035 General Plan. The Sacramento CAP includes GHG emission reduction targets, strategies, and implementation measures developed to help the City reach these targets. Reduction strategies address GHG emissions associated with transportation and land use, energy, water, waste management and recycling, agriculture, and open space.

Answers to Checklist Questions

A) Result in a potentially significant environmental impact due to wasteful. Inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?

No impact. Neither federal or State law nor the State CEQA Guidelines establish thresholds that define when energy consumption is considered wasteful, inefficient, and unnecessary. Compliance with CCR Title 24 Energy Efficiency Standards would result in energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. For example, energy would be required to transport people and goods to and from the project site. Energy use is discussed by anticipated use type below.

Construction

The proposed project includes the construction of two new mixed-light structures. These will be metal butler buildings, which are constructed up to 30 percent faster than conventional construction of buildings (Butler 2022). The building envelope assemblies are manufactured in a controlled environment of a factory and delivered to the job site in a ready-to-assemble sequence. Energy use for construction will consist of vehicles delivering materials, vehicles to aid in construction, and power tools for assembling the buildings.

Operational

The proposed project includes the use of existing office and warehouse buildings with similar operations in which they were previously used. Additionally, the two new mixed-light structures will be used for cannabis cultivation which will include 24 hour operations for cannabis production. These cultivation operations will consist of using natural light, which will penetrate the translucent rooves of the mixed-light structures helping to save on energy, as well as artificial light such as fluorescent, light emitting diode (LED), or high-pressure sodium (HPS) lighting. Cultivation will prove to be the highest energy consuming operational activity for the proposed project using an estimated 268 mWh per month (Appendix P). Regarding energy efficiency, the project applicant's Conditional Use Permit will be routed to SMUD for their review and may contact them for help finding the best way to provide reliable and energy efficient solutions for their business (Appendix H page 2). Employee travel to the proposed project site and distribution of cannabis products from the proposed project will also make use of vehicles for transportation.

The subject property has been historically used for similar light-industrial uses. Therefore, no impact would occur, and no mitigation is necessary.

B) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No impact. The 2035 General Plan states that the City shall encourage the installation and construction of renewable energy systems and facilities such as wind, solar, hydropower, geothermal, and biomass facilities (2035 General Plan U 6.1.6). Regarding energy efficiency, it states that the City shall develop and implement energy efficiency standards for existing buildings, and provide incentives for property owners to make improvements to meet minimum efficiency standards (2035 General Plan U 6.1.11). The largest use of energy for the proposed project will be electricity for the indoor cultivation of cannabis. There are no state or local plans that state thresholds for maximum use of electrical energy for cannabis cultivation. The proposed project will also implement cogeneration systems including solar photovoltaic panel arrays and a cogeneration microturbine with an electrical capacity of 530 kW. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Energy.

GEOLOGY AND SOILS

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
6. GEOLOGY AND SOILS Would the project allow a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards			✓

Environmental Setting

The project is located on lands within the City and County of Sacramento at an elevation of about 25 to 30 feet above mean sea level. This area is within the Great Valley geomorphic province of California. The Great Valley is bounded on the north by the Klamath and Cascade mountain ranges, on the east by the Sierra Nevada Mountains, and on the west by the Coast Ranges.

Seismic Hazards

No known active faults or Alquist-Priolo earthquake zones are present in Sacramento County. Although the site lies within the Central Valley part of California that is considered to be seismically stable, earthquake activity in neighboring regions, namely the Sierra Nevada and the San Francisco Bay area, could affect the project site with ground shaking and liquefaction. The closest active fault to the City of Sacramento is the foothills fault system about 23 miles east of the city. The maximum magnitude earthquake from the foothills fault system is anticipated to be magnitude 6.5. According to the City's Emergency Plan, the largest earthquake threat to the City comes from earthquakes along Northern California's major faults, which are the San Andreas, Calaveras, and Hayward faults. Ground shaking on any of these faults could cause shaking within the City to an intensity of 5 to 6 on the Modified Mercalli intensity scale. Liquefaction, the loss of soil shear strength caused by a sudden increase in pore water pressure, is determined by a number of factors, including soil type, depth to water, soil density, and the duration and intensity of ground shaking. Based on known soil, slope, groundwater, and ground shaking conditions in the project area, the potential for ground rupture, strong ground shaking and landslides, in the project area is considered to be low. Soils in the project area may be prone to liquefaction (City of Sacramento 2015).

Standards of Significance

For the purposes of this Initial Study, an impact is considered significant if it allows a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.5 of the Master EIR evaluated the potential effects related to seismic hazards, underlying soil characteristics, slope stability, erosion, existing mineral resources and paleontological resources in the City. Implementation of identified policies in the 2035 General Plan reduced all effects to a less-than-significant level. Policy EC 1.1.1 requires regular review of the City's seismic and geologic safety standards, and Policy EC 1.1.2 requires geotechnical investigations for project sites to identify and respond to geologic hazards, when present.

Answers to Checklist Questions

A) Would the project allow a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards?

No impact. The subject property has been previously used for industrial use. The proposed project operations will be similar to these uses and will include the construction of two mixed-light structures which will not involve any ground disturbing activities. According to the Transaction Screen Assessment, the subject property is underlain by layers of sandy silt and fine to coarse-grained sand with varying amounts of silt and gravel (Appendix G, page 7). Publicly available seismological information shows no faults are known to lie within the project site (California Geological Survey 2022). Existing buildings on-site were built in the 1960s (Appendix G page 6) and will be used and remain as-is. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Geology and Soils.

GREENHOUSE GAS EMISSIONS

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
7. GREENHOUSE GAS EMISSIONS Would the project:			
A) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓
B) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓

Environmental Setting

The City of Sacramento is located within the Sacramento Valley Air Basin (SVAB), which is a valley bounded by the North Coast Mountain Ranges to the west and the Northern Sierra Nevada Mountains to the east. The terrain in the valley is flat and approximately 25 feet above sea level.

Hot, dry summers and mild, rainy winters characterize the Mediterranean climate of the Sacramento Valley. Throughout the year, daily temperatures may range by 20 degrees Fahrenheit with summer highs often exceeding 100 degrees and winter lows occasionally below freezing. Average annual rainfall is about 20 inches and snowfall is very rare. Summertime temperatures are normally moderated by the presence of the "Delta breeze" that arrives through the Carquinez Strait in the evening hours.

The mountains surrounding the SVAB create a barrier to airflow, which can trap air pollutants in the valley. The highest frequency of air stagnation occurs in the autumn and early winter when large high-pressure cells lie over the valley. The lack of surface wind during these periods and the reduced vertical flow caused by less surface heating reduces the influx of outside air and allows air pollutants to become concentrated in a stable volume of air. The surface concentrations of pollutants are highest when these conditions are combined with temperature inversions that trap cooler air and pollutants near the ground.

The warmer months in the SVAB (May through October) are characterized by stagnant morning air or light winds, and the Delta breeze that arrives in the evening out of the southwest. Usually, the evening breeze transports a portion of airborne pollutants to the north and out of the Sacramento Valley. During about half of the day from July to September, however, a phenomenon called the "Schultz Eddy" prevents this from occurring. Instead of allowing the prevailing wind patterns to move north carrying the pollutants out of the valley, the Schultz Eddy causes the wind pattern to circle back south. This phenomenon exacerbates the pollution levels in the area and increases the likelihood of violating Federal or State standards. The Schultz Eddy normally dissipates around noon when the Delta breeze begins.

Greenhouse Gases

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. GHGs are responsible for "trapping" solar radiation in the earth's atmosphere, a phenomenon known as the greenhouse effect. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. Emissions of GHGs contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity

generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. Emissions of CO_2 are, largely, byproducts of fossil fuel combustion.

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is enormous. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

Several regulations currently exist related to GHG emissions, predominantly Assembly Bill (AB) 32, Executive Order S-3-05, and Senate Bill (SB) 32. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. Executive Order S-3-05 established the GHG emission reduction target for the State to reduce to the 2000 level by 2010, the 1990 level by 2020 (AB 32), 40 percent below the 1990 level by 2030, and to 80 percent below the 1990 level by 2050 (SB 32).

To meet the statewide GHG emission targets, the City adopted the City of Sacramento Climate Action Plan (CAP) on February 14, 2012 to comply with AB 32. The CAP identified how the City and the broader community could reduce Sacramento's GHG emissions and included reduction targets, strategies, and specific actions. In 2015, the City of Sacramento adopted the 2035 General Plan Update. The update incorporated measures and actions from the CAP into Appendix B, General Plan CAP Policies and Programs, which includes citywide policies and programs that are supportive of reducing GHG emissions

Standards of Significance

A project is considered to have a significant effect relating to greenhouse gas emissions if it fails to satisfy the requirements of the City's Climate Action Plan.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR found that greenhouse gas emissions that would be generated by development consistent with the 2035 General Plan would contribute to climate change on a cumulative basis. Policies of the General Plan identified in the Master EIR that would reduce construction related GHG emissions include: ER 6.1.2, ER 6.1.11 requiring coordination with SMAQMD to ensure feasible mitigation measures are incorporated to reduce GHG emissions, and ER 6.1.15. The 2035 General Plan incorporates the GHG reduction strategy of the 2012 Climate Action Plan (CAP), which demonstrates compliance mechanism for achieving the City's adopted GHG reduction target of 15 percent below 2005 emissions by 2020. Policy ER 6.1.8 commits the City to assess and monitor performance of GHG emission reduction efforts beyond 2020, and progress toward meeting long-term GHG emission reduction goals, ER 6.1.9 also commits the City to evaluate the feasibility and effectiveness of new GHG emissions reduction measures in view of the City's longer-term GHG emission reductions goal. The discussion of greenhouse gas emissions and climate change in the 2035 General Plan Master EIR are incorporated by reference in this Initial Study. (CEQA Guidelines Section 15150)

The Master EIR identified numerous policies included in the 2035 General Plan that addressed greenhouse gas emissions and climate change. See Draft Master EIR, Chapter 4.14, and pages 4.14-1 et seq. The Master EIR is available for review online at http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports

Answers to Checklist Questions

A) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

No impact. The proposed project would produce greenhouse gasses through use of electricity (indirect) and use of vehicles for transportation (direct). The proposed project will primarily make use of electricity for cannabis cultivation operations. The main use will be indoor lighting for cannabis cultivation. Electricity production generates the second largest share of greenhouse gas emissions, with approximately 60% of our electricity being produced by burning fossil fuels, primarily coal and natural gas (EPA 2022). Transportation of employees to and from the proposed project site as well as distribution of cannabis products will generate greenhouse gas emissions. According to the Master EIR Chapter 4.9-7, vehicle miles traveled is one of the primary generators of greenhouse gas emissions. Additionally, industrial energy consumption produced approximately 50 percent less greenhouse gas emissions than on-road transportation in 2020. The proposed project will be making use of the subject property with similar operations of projects that preceded it. Therefore, no impacts would occur, and no mitigation is necessary.

B) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No impact. The main energy source that the proposed project will use is electricity for the cultivation of cannabis. The Master EIR has no specific regulations regarding the use of electricity in regard to greenhouse gas emissions and rather focuses on transportation. The focus of the Master EIR on greenhouse gas emissions is to generally reduce emissions by specific percentages by 2035 and 2050. Since the use of electricity is an indirect producer of greenhouse gases, the focus of the Master EIR would lie with municipal greenhouse gas reductions. Policy ER 6.1.7 states that the City shall maintain and implement its Phase 1 Climate Action Plan to reduce municipal greenhouse gas emissions by 49 percent and 83 percent by 2035 and 2050, respectively. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Greenhouse Gas Emissions.

HAZARDS

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
8. HAZARDS Would the project:			
A) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities?			✓
B) Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials?			✓
C) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities?			✓

Environmental and Regulatory Setting

Federal regulations and regulations adopted by the Sacramento Metropolitan Air Quality Management District (SMAQMD() apply to the identification and treatment of hazardous materials during demolition and construction activities. Failure to comply with these regulations respecting asbestos may result in a Notice of Violation being issued by the AQMD and civil penalties under state and/or federal law, in addition to possible action by U.S. EPA under federal law.

Federal law covers a number of different activities involving asbestos, including demolition and renovation of structures (40 CFR § 61.145).

SMAQMD Rule 902 and Commercial Structures

The work practices and administrative requirements of Rule 902 apply to all commercial renovations and demolitions where the amount of Regulated Asbestos-Containing Material (RACM) is greater than:

- 260 lineal feet of RACM on pipes, or
- 160 square feet of RACM on other facility components, or
- 35 cubic feet of RACM that could not be measured otherwise.

The administrative requirements of Rule 902 apply to any demolition of commercial structures, regardless of the amount of RACM. To determine the amount of RACM in a structure, Rule 902 requires that a survey be conducted prior to demolition or renovation unless:

- the structure is otherwise exempt from the rule, or
- any material that has a propensity to contain asbestos (so-called "suspect material") is treated as if it is RACM.

Surveys must be done by a licensed asbestos consultant and require laboratory analysis. Asbestos consultants are listed in the phone book under "Asbestos Consultants." Large industrial facilities may use non-licensed employees if those employees are trained by the U.S. EPA. Questions regarding the use of non-licensed employees should be directed to the AQMD.

Standards of Significance

For the purposes of this Initial Study, an impact is considered significant if the proposed project would:

- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities;
- expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials; or
- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR evaluated effects of development on hazardous materials, emergency response and aircraft crash hazards. See Chapter 4.6. Implementation of the General Plan may result in the exposure of people to hazards and hazardous materials during construction activities, and exposure of people to hazards and hazardous materials during the life of the general plan. Impacts identified related to construction activities and operations were found to be less than significant. Policies included in the 2035 general Plan, including PHS 3.1.1 (investigation of sites for contamination) and PHS 3.1.2 (preparation of hazardous materials actions plans when appropriate) were effective in reducing the identified impacts.

Answers to Checklist Questions

A) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities?

No impact. The proposed project will make use of existing buildings on-site as well as the construction of two new mixed-light structures which will not include ground-disturbing activities where soils will be exposed. Therefore, no impact would occur and no mitigation is necessary.

B) Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials?

No impact. The possibility of asbestos containing materials and lead based paint is medium in the office area due to the fact that the structure was built in the 1960s (Appendix G page 6). However, all existing buildings on the subject property will remain and no demolition will occur. Therefore, there will be no exposure of asbestos containing materials. Regarding operation of the proposed project, the chemicals to be used can be seen in the Hazardous Materials Inventory Statement (Appendix C) and the Pest Management Plan (Appendix O) and management of hazardous materials is outlined in the Waste Management Plan (Appendix E). Therefore, no impact would occur, and no mitigation is necessary.

C) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities?

No impact. The proposed project will not include construction activities that involve ground-disturbing activities. Groundwater will not be exposed during the construction of the two new mixed-light structures. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Hazards.

HYDROLOGY AND WATER QUALITY

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
9. HYDROLOGY AND WATER QUALITY Would the project:			
A) Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project?			✓
B) Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood?			✓

Environmental Setting

The American River is located approximately 1 mile to the south of the project site. The American River is a 30 mile long river that runs from the Sierra Nevada mountain range to its confluence with the Sacramento River in downtown Sacramento. Via the Sacramento River, it is part of the San Francisco Bay watershed. The river is fed by the melting snowpack of the Sierra Nevada and its many headwaters and tributaries, including the North Fork American River, the Middle Fork American River, and the South Fork American River. The river has high quality water and it is the main source of drinking water for Sacramento. The American River watershed supports Mediterranean, temperate, and montane ecosystems, and it is the home of a diverse array of fish and wildlife.

Standards of Significance

For purposes of this Initial Study, impacts to hydrology and water quality may be considered significant if construction and/or implementation of the Proposed Project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the Specific Plan or
- substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.7 of the Master EIR evaluates the potential effects of the 2035 General Plan as they relate to surface water, groundwater, flooding, stormwater and water quality. Potential effects include water quality degradation due to construction activities (Impacts 4.7-1, 4.7-2), and exposure of people to flood risks (Impacts 4.7-3). Policies included in the 2035 General Plan, including a directive for regional cooperation (Policies ER 1.1.2, EC 2.1.1), comprehensive flood management (Policy EC 2.1.23), and construction of adequate drainage facilities with new development (Policy ER 1.1.1 to ER 1.1.10) were identified that the Master EIR concluded would reduce all impacts to a less-than-significant level.

Answers to Checklist Questions

A) Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project?

No impact. The proposed project will make use of existing buildings on-site and the construction of the two new mixed-light structures will not include ground disturbing activities and will not create sediments or other contaminants that would degrade water quality. Therefore, no impact would occur, and no mitigation is necessary.

B) Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood ?

No impact. The project site is within a flood zone X which is designated as an area with reduced flood risk due to levee (Appendix I). The subject property has been historically used for industrial uses and the proposed project operations will be similar to those which preceded it. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Hydrology and Water Quality.

NOISE

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
10. NOISE Would the project:			
A) Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?			✓
B) Result in residential interior noise levels of 45 dBA L_{dn} or greater caused by noise level increases due to the project?			✓
C) Result in construction noise levels that exceed the standards in the City of Sacramento general plan or Noise Ordinance?			✓
D) Permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction?			✓
E) Permit adjacent residential and commercial areas to be exposed to vibration-peak particle-velocities greater than 0.5 inches per second due to highway traffic and rail operations.			✓
F) Permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic?			✓

Environmental Setting

The proposed project is located in the Erickson Industrial Park area of North Sacramento. This area is zoned for light industrial use. Surrounding properties are being used in a similar manner to the proposed projects operations. The nearest sensitive receptors to sound are residential dwellings that begin 0.8 miles northwest of the proposed project site.

Standards of Significance

For purposes of this Initial Study, impacts due to noise may be considered significant if construction and/or implementation of the Proposed Project would result in the following impacts that remain significant after implementation of general plan policies:

- result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases;
- result in residential interior noise levels of 45 dBA L_{dn} or greater caused by noise level increases due to the project;
- result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance;
- permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction;
- permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations; or
- permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR evaluated the potential for development under the 2035 General Plan to increase noise levels in the community. New noise sources include vehicular traffic, aircraft, railways, light rail and stationary sources. The general plan policies establish exterior (Policy EC 3.1.1) and interior (Policy EC 3.1.3) noise standards. A variety of policies provide standards for the types of development envisioned in the general plan. See Policy EC 3.1.8, which requires new mixed-use, commercial and industrial development to mitigate the effects of noise from operations on adjoining sensitive land use, and Policy 3.1.9, which calls for the City to limit hours of operations for parks and active recreation areas to minimize disturbance to nearby residences. Notwithstanding application of the general plan policies, noise impacts for exterior noise levels (Impact 4.8-1) and interior noise levels (Impact 4.8-2), and vibration impacts (Impact 4.8-4) were found to be significant and unavoidable.

Answers to Checklist Questions

A) Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?

No impact. The City of Sacramento has no specific regulations regarding construction related noise. However, noise restrictions in place between the hours of 10:00pm to 7:00am of the following day would prohibit most construction work between these hours (City of Sacramento 2022). Construction for the proposed project will follow these noise restrictions. Standard operations of the proposed project, including cultivation will consist of indoor activities comparable to existing activities by neighboring properties. Therefore, no impact would occur, and no mitigation is necessary.

B) Result in residential interior noise levels of 45 dBA L_{dn} or greater caused by noise level increases due to the project?

No impact. The closest residential area to the proposed project site is approximately 0.8 miles northwest. In absence of obstructions, sound level typically attenuates at a rate of 6dBA for each doubling of distance (County of Santa Barbara 2017). Due to the distance between the proposed project site and the closest residential area, residential interior noise levels will not exceed 45dBA. Therefore, no impact would occur, and no mitigation is necessary.

C) Result in construction noise levels that exceed the standards in the City of Sacramento general plan or Noise Ordinance?

No impact. The City of Sacramento has no specific regulations regarding construction related noise. However, noise restrictions in place between the hours of 10:00pm to 7:00am of the following day would prohibit most construction work between these hours (City of Sacramento 2022). Construction for the proposed project will follow these noise restrictions. Therefore, no impact would occur, and no mitigation is necessary.

D) Permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction?

No impact. The proposed project will make use of existing buildings and include the construction of two new mixed light structures. These structures will be metal butler buildings, which are constructed out of pre-fabricated parts. The construction involves the assembly of pre-fabricated parts, which will make use of conventional construction equipment. These activities will not produce large vibrations. Therefore, no impact would occur, and no mitigation is necessary.

E) Permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations?

No impact. The closest residential areas to the proposed project site are approximately 0.8 miles away. The closest commercial area is approximately 0.1 miles away. Due to the distance between these areas and the proposed project site, vibration-peak-particle velocities will remain under the threshold of 0.5 inches per second during the proposed projects construction activities. Additionally, the proposed project does not involve highway traffic or rail operations. Therefore, no impact would occur, and no mitigation is necessary.

F) Permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic?

No impact. The closest historical building to the proposed project site is the Capitol Mansions which is approximately 4 miles away. Due to the distance between these properties, vibration-peak-particle velocities will remain under the threshold of 0.2 inches per second during the proposed projects construction activities. Additionally, the proposed project does not involve highway traffic. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Noise.

PUBLIC SERVICES

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
11. PUBLIC SERVICES Would the project result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan?			✓

Environmental Setting

The proposed project is located in the Erickson Industrial Park in North Sacramento. The nearest Fire station is the Sacramento Fire Department Station 19 (1.4 miles). The nearest police station is the Los Rios Police Department (1.8 miles). The nearest school facility is Woodlake Elementary School (1.2 miles). Mercy General Hospital is the nearest hospital (4 miles)

Standards of Significance

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR evaluated the potential effects of the 2035 General Plan on various public services. These include police, fire protection, schools, libraries, and emergency services (Chapter 4.10).

The general plan provides that adequate staffing levels for police and fire are important for the long-term health, safety and well-being of the community (Goal PHS 1.1, PHS 2.1). The Master EIR concluded that effects of development that could occur under the general plan would be less than significant.

General plan policies that call for the City to consider impacts of new development on schools (see, for example, Policy ERC 1.1.2 setting forth locational criteria, and Policy ERC 1.1.4 that encourages joint-use development of facilities) reduce impacts on schools to a less-than-significant level. (Impacts 4.10-3, 4) Impacts on library facilities were considered less than significant (Impact 4.10-5).

Answers to Checklist Questions

A) Would the project result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan?

No impact. Due to the proximity of fire, police, school, and hospital services as discussed above, the proposed project would not result in the need for new or altered services. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Public Services.

RECREATION

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
12. RECREATION Would the project:			
A) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?			✓
B) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan?			✓

Environmental Setting

The proposed project is located in the Erickson Industrial Park in North Sacramento. The nearest parks and recreation areas are Woodlake Park (1.3 miles), Babcock Park (1.8 miles), Howe Community Park (2.3 miles), Sutter's Landing Regional Park (3.3 miles), Discovery Park (4.1 miles), and Southside Park (6.1 miles). The American River is approximately 1 mile from the proposed project site which is surrounded by the American River Parkway and features trails for pedestrians and bikers.

Standards of Significance

For purposes of this Initial Study, impacts to recreational resources are considered significant if the proposed project would do either of the following:

- cause or accelerate substantial physical deterioration of existing area parks or recreational facilities; or
- create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.9 of the Master EIR considered the effects of the 2035 General Plan on the City's existing parkland, urban forest, recreational facilities and recreational services. The general plan identified a goal of providing an integrated park and recreation system in the City (Goal ERC 2.1). New residential development will be required to dedicate land, pay in-lieu fees or otherwise contribute a fair share to the acquisition and development of parks and recreation facilities (Policy ERC 2.2.5). Impacts were considered less than significant after application of the applicable policies. (Impacts 4.9-1 and 4.9-2)

Answers to Checklist Questions

A) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?

No impact. Although the proposed project is within close vicinity to quite a few parks and other recreational areas as discussed above, the proposed projects construction and operations will remain on the subject site and will not adversely affect any of these locations. Therefore, no impact would occur, and no mitigation is necessary.

B) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan?

No impact. Although the proposed project is within close vicinity to quite a few parks and other recreational areas as discussed above, the proposed project's construction and operations will remain on the subject site and will not adversely affect any of these locations nor create the need to expand or construct new recreational facilities. The subject property is an existing light-industrial parcel and has been historically used for operations similar to the proposed project. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Recreation.

TRANSPORTATION AND CIRCULATION

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
13. TRANSPORTATION AND CIRCULATION Would the project:			
A) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities			✓
B) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓
C) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓
D) Result in inadequate emergency access?			✓

Environmental Setting

The proposed project is located in the Erickson Industrial Park in North Sacramento. The nearest public transport station is the Royal Oaks Station, a light rail station (0.9 miles). The American River Parkway, surrounding the American River is approximately 1 mile away from the proposed project site. The American River Parkway features pedestrian and bicycle paths. The nearest main road to the subject property is Arden Way (0.3 miles). Arden Way is a major east-west arterial in Sacramento County. It is approximately 8 miles long and runs through Sacramento and the unincorporated suburbs of Arden-Arcade and Carmichael. It is a side street in a light industrial area, running approximately two blocks up to Colfax Street and paralleling the Arden-Garden Connector, the westward continuation for major thoroughfare traffic on Arden Way east of Colfax Street. After Colfax street, Arden Way gains its major thoroughfare status, intersecting Del Paso Boulevard and running parallel with the Regional Transit light rail tracks and a residential frontage street of Arden Way up until Royal Oaks Drive. The nearest highway interchange to the subject property is the Highway 80 and Highway 160 interchange (0.4 miles). These highways are located south and south east of the subject property.

Standards of Significance

For purposes of this Initial Study, impacts to recreational resources are considered significant if the proposed project would do either of the following:

- conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities; or
- conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b); or
- substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- result in inadequate emergency access.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Transportation and circulation were discussed in the Master EIR in Chapter 4.12. Various modes of travel were included in the analysis, including vehicular, transit, bicycle, pedestrian and aviation components. Provisions of the 2035 General Plan that provide substantial guidance include Mobility Goal 1.1, calling for a transportation system that is effectively planned, managed, operated and maintained, promotion of multimodal choices (Policy M 1.2.1), support for state highway expansion and management consistent

with the Sacramento Area Council of Governments Metropolitan Transportation Plan/Sustainable Communities Strategy (SACOG MTP/SCS) (Policy M 1.5.6) and development that encourages walking and biking (Policy LU 4.2.1).

While the general plan includes numerous policies that direct the development of the City's transportation system, the Master EIR concluded that the general plan development would result in significant and unavoidable effects. See Impacts 4.12-3 (roadway segments in adjacent communities, and Impact 4.12-4 (freeway segments).

Answers to Checklist Questions

A) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

No impact. The proposed project would involve construction of two new mixed-light structures. All construction involved would be conducted on the subject property and would not impact transit, roadways, bicycle, and pedestrian facilities. During project operations, traffic would primarily consist of employee vehicles entering the property and parking will be available on-site. This traffic will primarily come from Arden Way, which is the nearest main road to the subject property. Therefore, no impact would occur, and no mitigation is necessary.

B) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No impact. CEQA Guidelines Section 15064.3, subdivision (b) outlines the criteria for analyzing transportation impacts. Since the proposed project is considered a land use project, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact (CEQA Guidelines Section 15064.3, subdivision (b), (1)). This section of the CEQA Guidelines also states that projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant impact. The proposed project area is approximately 0.13 miles long and 0.05 miles wide and all construction activities will be conducted on-site. The miles traveled during project construction and operation will be negligible. Therefore, no impact would occur, and no mitigation is necessary.

C) Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No impact. The proposed project will make use of an existing light-industrial property and no physical changes to site layout and design will be made. The existing warehouse and office buildings will remain as-is and two new mixed-light structures will be constructed. The use and operations of the proposed project will be similar to operations which preceded it. Therefore, no impact would occur, and no mitigation is necessary.

D) Result in inadequate emergency access?

No impact. The subject property involves no deviations for the exterior design concept narrative of the existing buildings. The exterior secure loading area in the front of the facility is equipped with a rolling gate for vendor and transport vehicle entry. The rearrangement of parking spaces as described in the project description allow for improved access to emergency services. As a result, access to the subject property will remain the same as operations that preceded it. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Transportation and Circulation.

TRIBAL CULTURAL RESOURCES

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
14. TRIBAL CULTURAL RESOURCES Would the project:			
A) Cause a substantial adverse change in the significance of a tribal cultural resources, as defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined int terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is:			✓
i. Listed or eligible for listing in the California Register or Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) or			✓
ii. 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 Code 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.		✓	

Environmental Setting

The City of Sacramento and the surrounding area are known to have been occupied by Native American groups for thousands of years prior to settlement by non-Native peoples. Archaeological materials, including human burials, have been found throughout the city, some in deeply buried contexts. One of the tools used to identify the potential for cultural resources to be present in the project area is the 2035 General Plan Background Report. Generalized areas of high sensitivity for cultural resources are located within close proximity to the Sacramento and American Rivers and moderate sensitivity was identified near other watercourses. The proposed project site is not adjacent to these high or moderate sensitivity units shown in the 2035 General Plan Background Report. The 2035 General Plan land use diagram designates a wide swath of land along the American River as Parks, which limits development and impacts on sensitive cultural resources. High sensitivity areas may be found in other areas related to the ancient flows of the rivers, with differing meanders than found today. Recent discoveries during infill construction in downtown Sacramento have shown that the downtown area is highly sensitive for both historic period archaeological - and pre-contact indigenous resources. Native American burials and artifacts were found in 2005 during construction of the New City Hall and historic period archaeological resources are abundant downtown due to the evolving development of the area and, in part, to the raising of the surface street level in the 1860s and 1870s, which created basements out of the first floors of many buildings.

Data Sources/Methodology

Under PRC section 21080.3.1 and 21082.3, the City must consult with tribes traditionally and culturally affiliated with the project area that have requested formal notification and responded with a request for consultation. The parties must consult in good faith. Consultation is deemed concluded when the parties

agree to measures to mitigate or avoid a significant effect on a tribal cultural resource when one is present or when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed on during the consultation process must be recommended for inclusion in the environmental document.

In response to the City's notification of the project to the United Auburn Indian Community of the Auburn Rancheria (UAIC), UAIC conducted a records search for the identification of Tribal Cultural Resources for this project which included a review of pertinent literature and historic maps, and a records search using UAIC's Tribal Historic Information System (THRIS). UAIC's THRIS database is composed of UAIC's areas of oral history, ethnographic history, and places of cultural and religious significance, including UAIC Sacred Lands that are submitted to the Native American Heritage Commission (NAHC). The THRIS resources shown in this region also include previously recorded indigenous resources identified through the California Historic Resources Information System Center (CHRIS) as well as historic resources and survey data.

Native American Consultation

On March 22, 2022 notifications were sent to the four tribes who've previously requested to receive notifications pursuant to Public Resources Code Section 21080.3.1 (AB 52). None of the four tribes requested to consult or responded to the AB52 notification within the required 30 day period.

Regulatory Setting

Federal

There are no Federal plans, policies, or regulations related to Tribal Cultural Resources that are directly applicable to the proposed project, however Section 106 of the National Historic Preservation Act does require consultation with Native Americans to identify and consider certain types of cultural resources. Cultural resources of Native American origin identified as a result of the identification efforts conducted under Section 106 may also qualify as tribal cultural resources under CEQA.

State

California Environmental Quality Act — Statute and Guidelines. CEQA requires that public agencies that finance or approve public or private projects must assess the effects of the project on tribal cultural resources. Tribal cultural resources are defined in Public Resources Code (PRC) 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is (1) listed or determined eligible for listing on the California Register of Historical Resources (CRHR) or a local register, or (2) that are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

California Public Resources Code Section 5024. PRC Section 5024.1 establishes the CRHR, which is the authoritative guide for identifying the State's historical resources to indicate what properties are to be protected, if feasible, from substantial adverse change. For a resource to be eligible for the CRHR, it must be more than 50 years old, retain its historic integrity, and satisfy one or more of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

4. Has yielded, or may be likely to yield, information important in prehistory or history.

Standards of Significance

For the purposes of this Initial Study, a tribal cultural resource is considered to be a significant resource if the resource is: 1) listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources; or 2) the resource has been 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 Code Section 5024.1. For purposes of this Initial Study, impacts on tribal cultural resources may be considered significant if construction and/or implementation of the proposed project would result in the following:

- cause a substantial change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR evaluated the potential effects of development under the 2035 General Plan on prehistoric and historic resources (see Master EIR Chapter 4.4 and Appendix C – Background Report, B. Cultural Resources Appendix), but did not specifically address tribal cultural resources because that resource type had not yet been defined in CEQA at the time the Master EIR was adopted. The Master EIR identified significant and unavoidable effects on historic resources and archaeological resources, some of which could be tribal cultural resources as defined Public Resources Code 21074. Ground-disturbing activities resulting from implementation of development under the 2035 General Plan could affect the integrity of an archaeological site (which may be a tribal cultural resource), thereby causing a substantial change in the significance of the resource. General plan policies identified as reducing such effects on cultural resources that may also be tribal cultural resources include identification of resources on project sites (Policy HCR 2.1.1); implementation of applicable laws and regulations (Policy HCR 2.1.2); consultation with appropriate organizations and individuals including the Native American Heritage Commission and implementation of their consultation guidelines (Policy HCR 2.1.3); enforcement programs to promote the maintenance, rehabilitation, preservation, and interpretation of the City's historic resources (Policy HCR 2.1.4); listing of qualified historic resources under appropriate national, State, and local registers (Policy HCR 2.1.5); consideration of historic and cultural resources in planning studies (Policy HCR 2.1.6); enforcement of compliance with local, State, and federal historic and cultural preservation requirements (Policy HCR 2.1.8); and early consultation with owners and land developers to minimize effects (Policy HCR 2.1.10).

Of particular relevance to this project are policies that ensure compliance with protocol that protect or mitigate impacts to archaeological resources (Policy HCR 2.1.16) and that encourage preservation and minimization of impacts on cultural resources (Policy HCR 2.1.17). Answers to Checklist Questions

The site is an existing developed warehouse. The project site is not listed on any historic registers and the tribes contacted provided no information suggesting the site could be listed**,** however, unknown resources below the surface could be encountered during development of the site. Therefore, the proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074, but the effect can be mitigated to less than significant. Implementation of Mitigation Measures 13-1 through 13-3 would reduce the impact to a less-than-significant level. Thus, with implementation of Mitigation Measures TCR-1a through TCR-1c, implementation of the proposed project would have no additional significant environmental effects beyond what was previously analyzed in the Master EIR.

Mitigation Measures

Mitigation Measure TCR-1a: Conduct Cultural Resources and Tribal Cultural Resources Sensitivity and Awareness Training Program Prior to Ground-Disturbing Activities

The City shall require the applicant/contractor to provide a tribal cultural resources sensitivity and awareness training program (Worker Environmental Awareness Program [WEAP]) for all personnel involved in project construction, including field consultants and construction workers. The WEAP will be developed in coordination with culturally affiliated Native American tribes. T The WEAP shall be conducted before any project-related construction activities begin at the project site. The WEAP will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations.

The WEAP will also describe appropriate avoidance and impact minimization measures for tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential tribal cultural resources are encountered. The WEAP will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values.

Mitigation Measure TCR-1b: In the Event that Tribal Cultural Resources Are Discovered During Construction, Implement Avoidance and Minimization Measures to Avoid Significant Impacts and Procedures to Evaluate Resources.

If tribal cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural materials), and the construction contractor shall immediately notify the project's City representative. Avoidance and preservation in place is the preferred manner of mitigating impacts to tribal cultural resources. This will be accomplished, if feasible, by several alternative means, including:

- Planning construction to avoid tribal cultural resources, archaeological sites and/or other cultural resources; incorporating cultural resources within parks, green-space or other open space; covering archaeological resources; deeding a cultural resource to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity.

- Recommendations for avoidance of tribal cultural resources will be reviewed by the City representative, interested culturally affiliated Native American tribes and other appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project site to avoid tribal cultural resources, modification of the design to eliminate or reduce impacts to tribal cultural resources or modification or realignment to avoid highly significant features within a cultural resource or tribal cultural resource.

- Native American representatives from interested culturally affiliated Native American tribes will be notified to review and comment on these analyses and shall have the opportunity to meet with the City representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.

- If the discovered tribal cultural resource can be avoided, the construction contractor(s), will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. The boundary of a a tribal cultural resource will be determined in consultation with interested culturally affiliated Native American tribes and tribes will be notified to monitor the installation of fencing. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.

- The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area".

If a tribal cultural resource cannot be avoided, the following performance standard shall be met prior to continuance of construction and associated activities that may result in damage to or destruction of tribal cultural resources:

- Each resource will be evaluated for California Register of Historical Resources- (CRHR) eligibility through application of established eligibility criteria (California Code of Regulations 15064.636), in consultation with consulting Native American Tribes, as applicable.

If a a tribal cultural resource is determined to be eligible for listing in the CRHR, the City will avoid damaging effects to the resource in accordance with California PRC Section 21084.3, if feasible. The City shall coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) approved by the City and with interested culturally affiliated Native American tribes that respond to the City's notification. As part of the site investigation and resource assessment, the City and the archaeologist shall consult with interested culturally affiliated Native American tribes to assess the significance of the find, make recommendations for further evaluation and treatment as necessary and provide proper management recommendations should potential impacts to the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record. For any recommendations made by interested culturally affiliated Native American tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

Native American representatives from interested culturally affiliated Native American Tribes and the City representative will also consult to develop measures for long-term management of any discovered tribal cultural resources. Consultation will be limited to actions consistent with the jurisdiction of the City and taking into account ownership of the subject property. To the extent that the City has jurisdiction, routine operation and maintenance within tribal cultural resources retaining tribal cultural integrity shall be consistent with the avoidance and minimization standards identified in this mitigation measure.

If the City determines that the project may cause a significant impact to a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less-than significant may be reached:

- Avoid and preserve resources in place, including, but not limited to, planning construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or

other open space, to incorporate the resources with culturally appropriate protection and management criteria.

- Treat the resource with culturally appropriate dignity taking into account the Tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protect the cultural character and integrity of the resource.
    - Protect the traditional use of the resource.
    - Protect the confidentiality of the resource.
    - Establish permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places.
    - Protect the resource.

Mitigation Measure TCR-1c: Implement Procedures in the Event of the Inadvertent Discovery of Human Remains.

If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the City the following performance standards shall be met prior to implementing or continuing actions such as construction, which may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (HSC Section 7050.5[b]).

If the human remains are of historic age and are determined to be not of Native American origin, the City will follow the provisions of the HSC Section 7000 (et seq.) regarding the disinterment and removal of non-Native American human remains.

If the Coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the Coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant (MLD), in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in California PRC Section 5097.9 et seq.

Findings

Implementation of Mitigation Measures TCR-1a-c would identifiy necessary steps to ensure the development would not result in impacts to tribal cultural resources. Thus, all significant environmental effects ofthe proposed project would be mitigated to a less-than-significant level, and the proposed project would have no additional project-specific environmental effects relating to Cultural Resources.

UTILITIES AND SERVICE SYSTEMS

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
15. UTILITIES AND SERVICE SYSTEMS Would the project:			
A) Result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments?			✓
B) Require a result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts?			✓

Environmental Setting

The proposed project is located in the Erickson Industrial Park in North Sacramento. The subject property and neighboring properties are zoned for light-industrial use. The property is equipped with utilities including municipal water and electricity. The subject property is equipped with 1200 AMPS 277-480 volt 3-phase power (Appendix G page 6).

The City of Sacramento acquires approximately 80 percent of its water supply as surface water from the Sacramento and American Rivers. The remaining 20 percent of water comes from the City's system of about 28 groundwater wells. The Water Distribution Team serves almost one-half million customers within a 100-square-mile service area delivering 37 billion gallons of potable water per year. The Sacramento Municipal Utility District (SMUD) generates the bulk of its power through natural gas (estimated 56%) and hydroelectric generation plants (estimated 22%).

Standards of Significance

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, or school facilities beyond what was anticipated in the 2035 General Plan:

- result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments or
- require or result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR evaluated the effects of development under the 2035 General Plan on water supply, sewer and storm drainage, solid waste, electricity, natural gas and telecommunications. See Chapter 4.11.

The Master EIR evaluated the impacts of increased demand for water that would occur with development under the 2035 General Plan. Policies in the general plan would reduce the impact generally to a less-than-significant level (see Impact 4.11-1) but the Master EIR concluded that the potential increase in demand for potable water in excess of the City's existing diversion and treatment capacity, and which could require construction of new water supply facilities, would result in a significant and unavoidable effect (Impact 4.11-2). The potential need for expansion of wastewater treatment facilities was identified as having a less-than-significant effect (Impact 4.11-4). Impacts on solid waste facilities were less than significant (Impact 4.11-5). Implementation of energy efficient standards as set forth in Titles 20 and 24

of the California Code of Regulations for residential and non-residential buildings, would reduce effects for energy to a less-than-significant level.

Answers to Checklist Questions

A) Result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments?

No impact. Energy use related to the proposed project would include energy directly consumed for special lighting, ventilation, and air conditioning systems. The proposed project will also make use of water for cultivation processes. The subject property has historically been used for similar light-industrial operations and is equipped with municipal water and electricity supplies. These existing utilities on-site are adequate for the proposed project and will not result in the determination that adequate capacity is not available. Therefore, no impact would occur, and no mitigation is necessary.

B) Require or result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts?

No impact. The subject property has historically been used for similar light-industrial operations and is equipped with municipal water and electricity supplies. These existing utilities on-site are adequate for the proposed project and will not result in the construction of new utilities or expansion of existing utilities. Therefore, no impact would occur, and no mitigation is necessary.

Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

Findings

The project would have no additional project-specific environmental effects relating to Utilities and Service Systems.

MANDATORY FINDINGS OF SIGNIFICANCE

Issues:	Effect will be studied in the EIR	Effect will be mitigated to less than significant	No additional significant environmental effect
16. MANDATORY FINDINGS OF SIGNIFICANCE Does the project:			
A) 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 plan 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) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects.)			✓
C) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			✓

Answers to Checklist Questions

A) Does the project 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?

No impact. The proposed project construction and operations will take place on an already developed parcel of property zoned for light-industrial use. There are no remaining fish or wildlife habitat, plant or animal communities, or rare or endangered plants or animals on-site. Additionally, there are no examples of the major periods of California history or prehistory to be eliminated on-site. No major changes to the design and footprint of the property will occur. Therefore, no impact would occur, and no mitigation is necessary.

B) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

No impact. The cumulative context for the proposed project is the continued buildout of the City's 2035 General Plan. With implementation of applicable General Plan policies, requited regulation, and ordinances, the proposed project would not substantially contribute to cumulative impacts and/or cause the cumulative impacts of the 2035 General Plan EIR to exceed the levels described in the MEIR. The proposed project is consistent with the City's 2035 General Plan and would not result in new or increased cumulative impacts or result in additional significant effects and impacts. Therefore, no impact would occur, and no mitigation is necessary.

C) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No impact. The proposed project consists of use of a property that was previously used for similar light-industrial operations. The construction of two mixed-light structures will be the only addition to the existing buildings on site. Operations include cultivation, manufacturing, and distribution of cannabis. As discussed in the project description above, project features have been put in place for operations that would avoid impacts regarding hazardous materials, wastewater, aesthetics, and air quality. These measures are standard for such a project and help avoid any environmental impacts that may cause substantial adverse effects on human beings, whether directly or indirectly. Therefore, no impact would occur, and no mitigation is necessary.

SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would potentially be affected by this project.

	Aesthetics		Hazards
x	Air Quality		Noise
	Biological Resources		Public Services
	Cultural Resources		Recreation
	Energy and Mineral Resources		Transportation/Circulation
	Geology and Soils	x	Tribal Cultural Resources
	Hydrology and Water Quality		Utilities and Service Systems
	None Identified		

SECTION V - DETERMINATION

On the basis of the initial study:

Note: The applicable paragraph should be included, and the others deleted. Questions regarding the findings should be directed to the environmental project planner.

I find that (a) the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; and (c) the proposed project will not have any project-specific additional significant environmental effects not previously examined in the Master EIR, and no new mitigation measures or alternatives will be required. Mitigation measures from the Master EIR will be applied to the proposed project as appropriate. Notice shall be provided pursuant to CEQA Guidelines Section 15087. (CEQA Guidelines Section 15177(b))

X I find that (a) the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the Master EIR are adequate for the proposed project; and (d) the proposed project will have additional significant environmental effects not previously examined in the Master EIR. A Mitigated Negative Declaration will be prepared. Mitigation measures from the Master EIR will be applied to the project as appropriate, and additional feasible mitigation measures and alternatives will be incorporated to revise the proposed project before the negative declaration is circulated for public review, to avoid or mitigate the identified effects to a level of insignificance. (CEQA Guidelines Section 15178(b))

I find that (a) the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the Master EIR are adequate for the proposed project; and (d) the proposed project will have additional significant environmental effects not previously examined in the Master EIR. A focused EIR shall be prepared which shall incorporate by reference the Master EIR and analyze only the project-specific significant environmental effects and any new or additional mitigation measures or alternatives that were not identified and analyzed in the Master EIR. Mitigation measures from the Master EIR will be applied to the project as appropriate. (CEQA Guidelines Section 15178(c))

I find that (a) the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the Master EIR are not adequate for the proposed project; and (d) the proposed project will have additional significant environmental effects not previously examined in the Master EIR. An EIR shall be prepared, which shall tier off of the Master EIR to the extent feasible. (CEQA Guidelines Section 15178(e))

Ron Bess — July 11, 2022

Signature — Date

Ron Bess

Printed Name

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