



Mitigated Negative Declaration

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

1. **Control Number:** PLNP2020-00131
2. **Title and Short Description of Project:** Grace Bible Church Expansion

The proposed project is a request for the following planning entitlements:

- A **Use Permit Amendment:** to allow expansion of the existing church by increasing assembly-use to 800 persons; expansion of the private K-12 school to allow up to 300 students; future construction of 25,000 square feet in new buildings and additions to replace existing modular buildings, and construction of new parking.
 - A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).
3. **Assessor's Parcel Number:** 235-0214-001, 248-0011-048, and 248-0011-003
 4. **Location of Project:** The project site is located at the southeast corner of the intersection of Hazel Avenue and Cedarvillage Drive, in the Fair Oaks community.
 5. **Project Applicant:** Baranov Building Design
 6. Said project will not have a significant effect on the environment for the following reasons:
 - a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
 - b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
 - c. It will not have impacts, which are individually limited, but cumulatively considerable.
 - d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.
 7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

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

[Original Signature on File]

Joelle Inman

Environmental Coordinator

County of Sacramento, State of California

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2020-00131

NAME: Grace Bible Church Expansion

LOCATION: The project site is located at the southeast corner of the intersection of Hazel Avenue and Cedarvillage Drive, in the Fair Oaks community.

ASSESSOR'S PARCEL NUMBERS: 235-0214-001, 248-0011-048, and 248-0011-003

OWNER: Grace Bible Church
5010 Hazel Avenue
Fair Oaks, CA 95628
Attention: Brian Liebich

APPLICANT: Baranov Building Design
5620 Benhenry Court
Rocklin, CA 95677
Attention: Andre Baranov

PROJECT DESCRIPTION

The proposed project is a request for the following planning entitlements:

1. A **Use Permit Amendment** to allow expansion of the existing church by increasing assembly-use to 800 persons, expansion of the private K-12 school to allow up to 300 students, future construction of 25,000 square feet in new buildings and additions to replace existing modular buildings, and construction of new parking. Note: The proposed project is for the expansion of the above uses. This document is only analyzing the changes associated with the expansion and not the existing uses/capacity currently operating on-site.
2. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

ENVIRONMENTAL SETTING

The proposed project site is located within an urban residential area in the northeastern portion of unincorporated Sacramento County (see Plate IS-1). The proposed project site

is located on the east side of Hazel Avenue at the corner of Cedarville Drive, in the community of Fair Oaks. The site currently operates as a church and Private K-12 school. The church use has been in operation on the property since 1954. The site is developed with buildings for the church and school uses as well as associated parking, paved play area, and landscaping. Existing buildings on-site include separate buildings for sanctuary, fellowship, classroom, youth ministries, and offices along with a classroom modular totaling approximately 28,382 square feet. The vacant parcel at the southern portion of the site was once developed as a single-family residential lot, but the structures were subsequently demolished. The frontage of the project site is included as part of the Hazel Avenue Road Widening project by the Sacramento County Department of Transportation (SacDOT).

The northernmost parcel (APN: 235-0214-001) is zoned RD-20 (Residential Density 20 acres) and the remaining project parcels are zoned RD-5 (Residential Density 5 acres). Surrounding land uses mainly consist of single-family residential uses. Exceptions include a water tank located adjacent to the site's northernmost parcel and a Fire Station located across Hazel Avenue from the project site. Zoning of parcels to the west across Hazel Avenue are RD-3 (Residential Density 3 acres). Parcels to the south, north, and east are zoned RD-5. See Plate IS-2 and Plate IS-3 to review project location and zoning maps.

The proposed project includes the expansion of the existing church and private school uses, and involves the construction of a new church building, associated parking, drive aisles, concrete flatwork, landscaping, and underground utilities. A new 20,000 square foot fellowship/class/office/kitchen building will be built on-site along with square footage additions to the existing sanctuary and fellowship buildings. The existing classroom modular and office buildings on-site will be demolished. At full buildout, the site will have approximately 45,527 square feet of building area. See Plate IS-4 for the Master Site Plan of the proposed project. See Table IS-1 for the existing and proposed building areas on-site and Table IS-2 for the existing and proposed maximum capacity of uses on-site.

The project site supports landscaping, trees, and grasses, particularly on the vacant parcel. Trees on-site, consisting of both native oaks and non-native trees, are located along the site's boundaries and within the vacant parcel. Overall, the project site is relatively flat, but does have differences in grade elevation from Hazel Avenue (between 262 to 264 feet) to the eastern portion of the site (between 260 to 254 feet).

Table IS-1: Existing and Proposed Building Areas of Project Master Site Plan (in square feet)

Building No.	Existing	Demolished	New	Buildout
Sanctuary "A"	6,972 SF	0 SF	3,000 SF	9,972 SF
Fellowship "B"	5,555 SF	0 SF	2,000 SF	7,555 SF
Classroom "C"	8,000 SF	0 SF	0 SF	8,000 SF
Youth Ministries	1,655 SF	1,655 SF	0 SF	0 SF
Classroom Modular	4,000 SF	4,000 SF	0 SF	0 SF
Office	2,200 SF	2,200 SF	0 SF	0 SF
Fellowship/Class/Office/Kitchen	0 SF	0 SF	20,000 SF	20,000 SF
Totals	28,382 SF	7,855 SF	25,000 SF	45,527 SF

Table IS-2: Existing and Proposed Maximum Capacity for Uses On-site

Use	Existing	Proposed
Church Congregation	600 persons	800 persons
Preschool and K-8 Private School	300 students (School's enrollment numbers vary from 160 to 300 students).	300 students (No increase is proposed).

Plate IS-1: County Vicinity Map

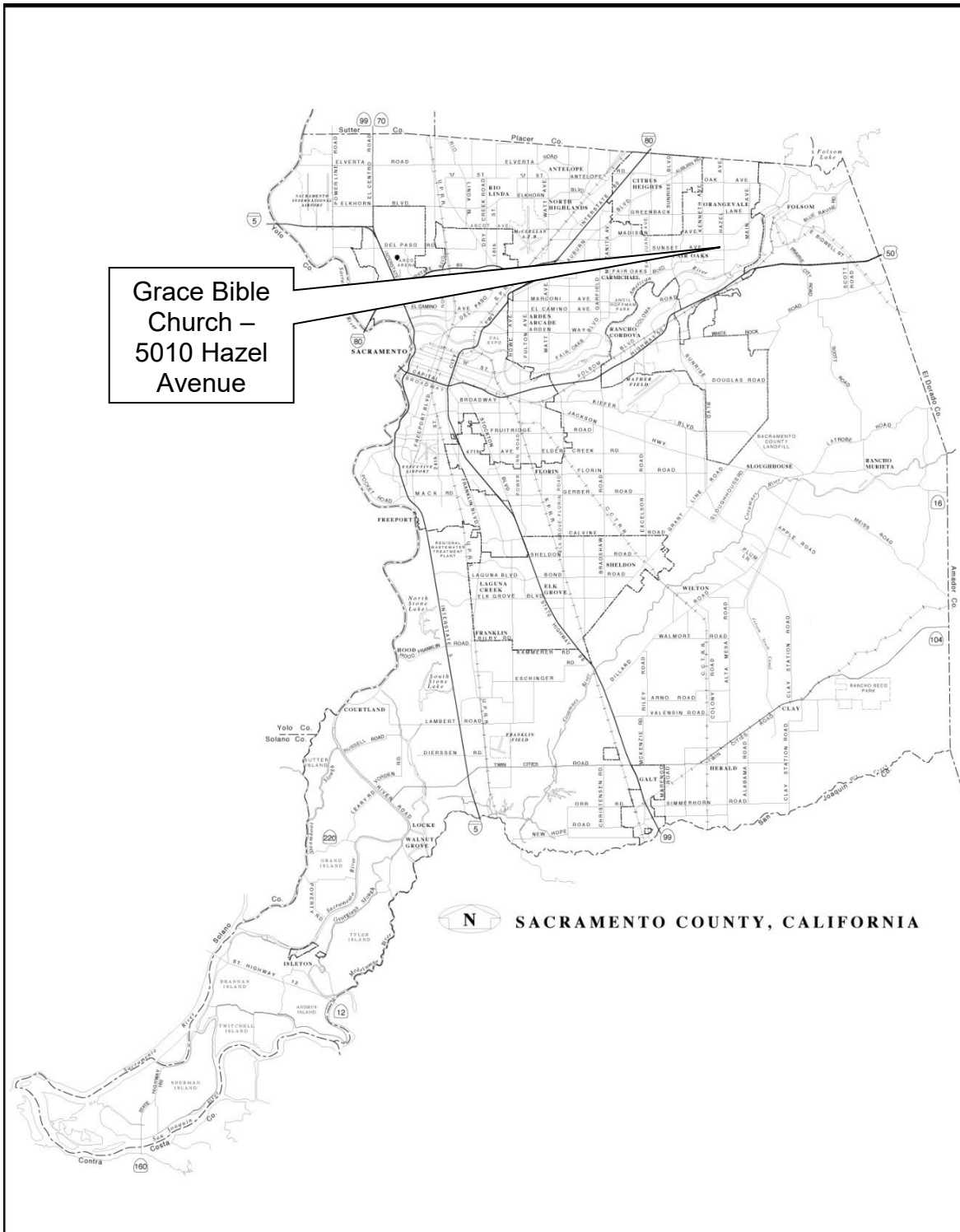


Plate IS-2: Location Map

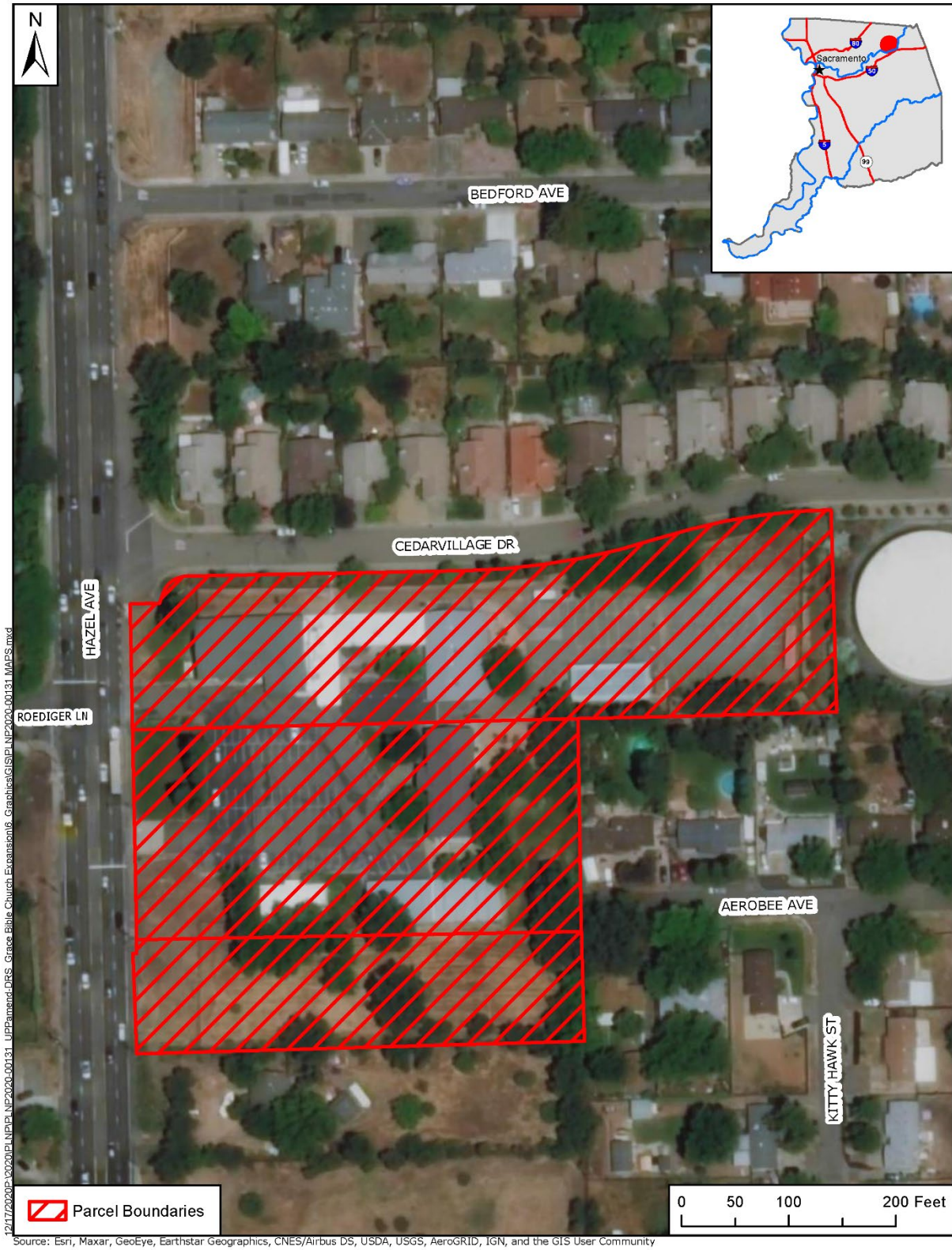
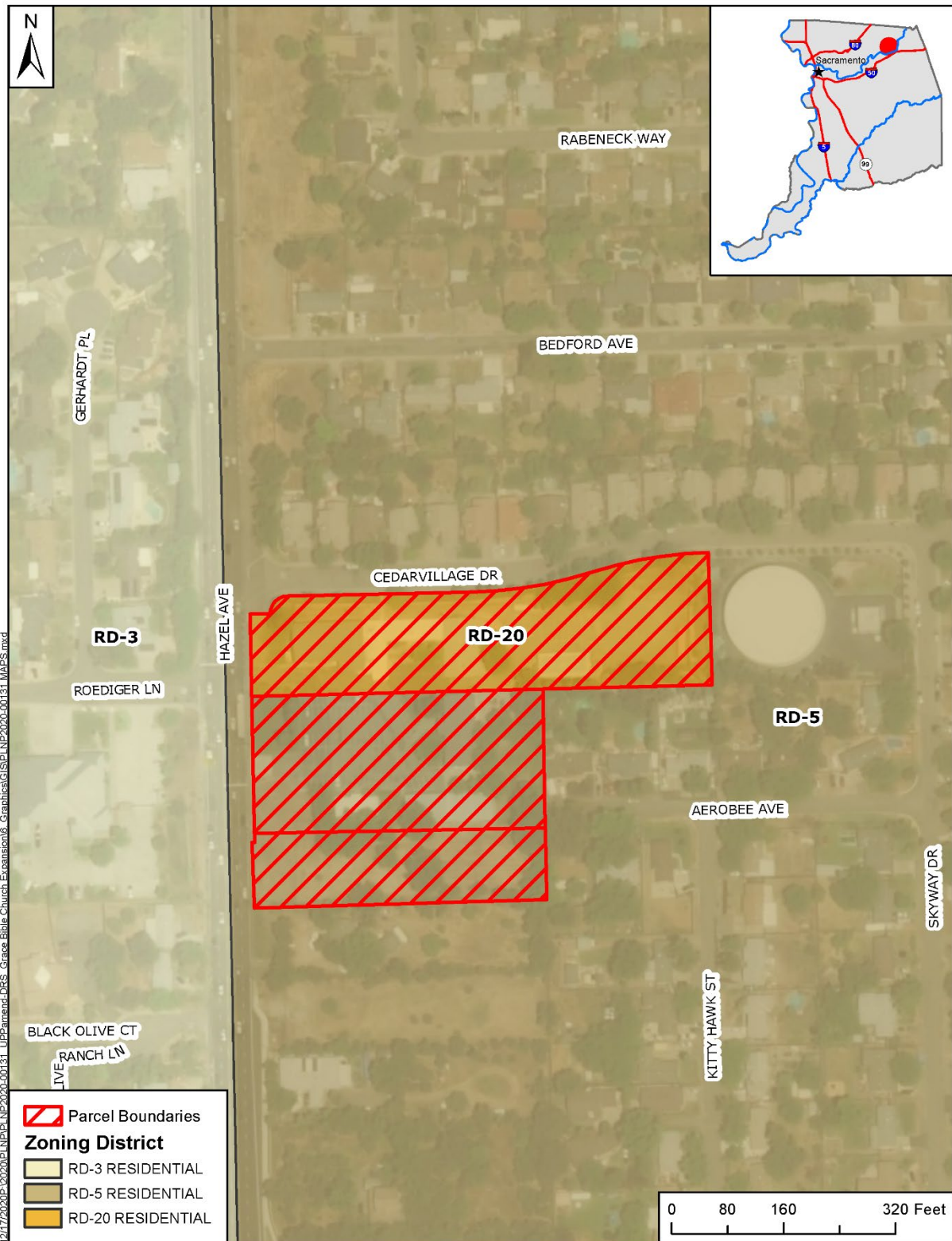


Plate IS-3: Zoning Map



121772020P-002001.NP.LN.P2020-00131_LUPParamand.DES_Grace Bible Church Expansion16_Graphics\GIS\PLN\2020-00131_MAPS.mxd

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

ENVIRONMENTAL EFFECTS

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

BACKGROUND

As noted above, the church has been in operation on the property since 1954. A Notice of Exemption (NOE) was filed for a Use Permit to legalize the existing church and allow a mobile home to be placed on the church property as a residence for a night watchman (County Control No. 1984-UP-1014). No other entitlements or environmental documentation has been issued for the subject property, with the exception of substantial compliance determinations in 2001 and 2020.

TRANSPORTATION/TRAFFIC

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

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

VMT ANALYSIS

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

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

Sacramento County Department of Transportation (SacDOT) has updated the Sacramento County Transportation Analysis Guidelines to reflect the new analysis requirements. The updated guidelines can be viewed at:

<https://sacdot.saccounty.net/Documents/A%20to%20Z%20Folder/Traffic%20Analysis/Transportation%20Analysis%20Guidelines%2009.10.20.pdf#search=transportation%20guidelines>

SacDOT has developed screening criteria for development projects. The screening criteria for VMT thresholds of significance are summarized in Table IS-3.

Table IS-3: Screening Criteria for CEQA Transportation Analysis

Type	Screening Criteria
Small Projects	<ul style="list-style-type: none"> • Projects generating less than 237 average daily traffic (ADT)
Local-Serving Retail ¹	<ul style="list-style-type: none"> • 100,000 square feet of total gross floor area or less; <u>OR</u> if supported by a market study with a capture area of 3 miles or less; <u>AND</u> • Local Serving: Project does not have regional-serving characteristics.
Local-Serving Public Facilities/Services	<ul style="list-style-type: none"> • Transit centers • Day care center • Public K-12 schools • Neighborhood park (developed or undeveloped) • Community center • Post offices • Police and fire facilities • Branch libraries • Government offices (primarily serving customers in-person) • Utility, communications, and similar facilities • Water sanitation, waste management, and similar facilities
Projects Near Transit Stations	<ul style="list-style-type: none"> • High-Quality Transit: Located within ½ a mile of an existing major transit stop² or an existing stop along a high-quality transit corridor³; <u>AND</u> • Minimum Gross Floor Area Ratio (FAR) of 0.75 for office projects or components; <u>AND</u> • Parking: Provides no more than the minimum number of parking spaces required⁴; <u>AND</u> • Sustainable Communities Strategy (SCS): Project is not inconsistent with the adopted SCS; <u>AND</u> • Affordable Housing: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units; <u>AND</u> • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.

<p>Restricted Affordable Residential Projects</p>	<ul style="list-style-type: none"> • Affordability: Screening criteria only apply to the restricted affordable units; AND • Restrictions: Units must be deed-restricted for a minimum of 55 years; AND • Parking: Provides no more than the minimum number of parking spaces required⁴; AND • Transit Access: Project has access to transit within a ½ mile walking distance; AND • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.
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¹ See Appendix A for land use types considered to be retail.

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

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

⁴ Sacramento County Zoning Code Chapter 5: Development Standards

VMT: DISCUSSION OF IMPACTS

The Department of Transportation (DOT) reviewed the proposed project to determine whether the project would require a VMT analysis. The project is considered an existing Private K-12 School and a Place of Worship with a current square footage total of approximately 28,382 square feet on-site. The existing maximum capacity is 600 persons for the church use and 160 students (as of Fall 2020) for the private K-12 school use. With the proposed project, the expansion will consist of an additional 25,000± square feet on-site. With the demolition of 7,855± square feet, the total proposed square footage at project build out will be approximately 45,527 square feet on-site. At build-out, the maximum capacity will be 800 persons for the church use and 300 students for the private K-12 school use. According to the screening criteria listed in Table IS-3, the project screens out because it falls into the exclusion category of “small projects” due to producing less than 237 new daily trips. Thus, no further analysis is required.

DOT staff, Cameron Shew, prepared a Trip Generation Table (Table IS-4) comparing the existing use to the proposed use. As shown in Table IS-4, the proposed project would result in 35 new daily trips. Although the school’s building square footage will be increasing in size, the calculated change in overall new trips is based on the school’s historical capacity and their new planned capacity. According to the project applicant, the historical capacity is 300 students and that capacity will not increase with the proposed project. Thus, the net change in school trips is zero. From the screening criteria listed in Table IS-3, because the project generates less than 237 new daily trips, a VMT analysis is not warranted. Further, the addition of 35 new daily trips does not result in a substantial increase in VMT and impacts to transportation/traffic are **less than significant**.

Table IS-4: Trip Generation Table

Condition	Zoning Use (Area) or	Source	Daily Trip Rate	Daily Trips	P.M. Hour Rate	Peak Trip	P.M. Peak Trips
Existing Use	Church 12.53 KSF GFA	ITE (560)	6.95 VTE/KSF GFA	87	0.49 VTE/KSF GFA		6
Existing Use	Private School (K-12) 300 Students	ITE (536)	2.48 VTE/Student	744	0.17 VTE/Student		51
Proposed Use	Church 17.53 KSF GFA	ITE (560)	6.95 VTE/KSF GFA	122	0.49 VTE/KSF GFA		9
Proposed Use	Private School (K-12) 300 Students	ITE (536)	2.48 VTE/Student	744	0.17 VTE/Student		51
Increase in trips from Existing to Proposed Uses				35	---		3

Notes: VTE = Vehicle Trip Ends KSF GFA = 1000 square foot gross floor area

ITE = Institute of Transportation Engineers, *Trip Generation*, 10th Edition (Land Use No.)

Note: The proposed new 20,000± square foot building was not included in square footage numbers above because the maximum capacity for the private school use at 300 students will remain as is.

AIR QUALITY

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

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

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB’s frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-5). Moreover, SMAQMD has established significance thresholds to determine if a proposed project’s emission contribution significantly contributes to regional air quality impacts (Table IS-6).

Table IS-5: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment (1 hour Standard ¹ and 8 hour standard)	Non-Attainment, Classification = Severe -15* (8 hour ³ Standards) Attainment (1 hour standard ²)
Particulate Matter 10 Micron	Non-Attainment (24 hour Standard and Annual Mean)	Attainment (24 hour standard)
Particulate Matter 2.5 Micron	Attainment (Annual Standard)	Non-Attainment (24 hour Standard) and Attainment (Annual)
Carbon Monoxide	Attainment (1 hour and 8 hour Standards)	Attainment (1 hour and 8 hour Standards)
Nitrogen Dioxide	Attainment (1 hour Standard and Annual)	Unclassified/Attainment (1 hour and Annual)
Sulfur Dioxide ⁴	Attainment (1 hour and 24 hour Standards)	Attainment/unclassifiable ⁵
Lead	Attainment (30 Day Standard)	Attainment (3-month rolling average)
Visibility Reducing Particles	Unclassified (8 hour Standard)	No Federal Standard

Sulfates	Attainment (24 hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (1 hour Standard)	No Federal Standard
<p>1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.</p> <p>2. Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009.</p> <p>3. For the 1997, 2008 and the 2015 Standard.</p> <p>4. Cannot be classified</p> <p>5. Designation was made as part of EPA’s designations for the 2010 SO₂ Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017</p> <p>* Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports Source: SMAQMD. “Air Quality Pollutants and Standards”. Web. Accessed: December 3, 2018. http://airquality.org/air-quality-health/air-quality-pollutants-and-standards</p>		

Table IS-6: SMAQMD Significance Thresholds

	ROG ¹ (lbs/day)	NO _x (lbs/day)	CO (µg/m ³)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Construction (short-term)	None	85	CAAQS ²	80 ^{3*}	82 ^{3*}
Operational (long-term)	65	65	CAAQS	80 ^{3*}	82 ^{3*}
<p>1. Reactive Organic Gas 2. California Ambient Air Quality Standards 3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.</p>					

CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS

Short-term air quality impacts are mostly due to dust (PM₁₀ and PM_{2.5}) generated by construction and development activities, and emissions from equipment and vehicle engines (NO_x) operated during these activities. Dust generation is dependent on soil type and soil moisture, as well as the amount of total acreage actually involved in clearing, grubbing and grading activities. Clearing and earthmoving activities comprise the major source of construction dust generation, but traffic and general disturbance of the soil also contribute to the problem. Sand, lime or other fine particulate materials may be used during construction, and stored on-site. If not stored properly, such materials could become airborne during periods of high winds. The effects of construction activities include increased dust fall and locally elevated levels of suspended particulates. PM₁₀ and PM_{2.5} are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

CONSTRUCTION PARTICULATE MATTER EMISSIONS

The Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide) includes screening criteria for construction-related particulate matter. Projects that are 35 acres

or less in size will generally not exceed the SMAQMD's construction PM₁₀ or PM_{2.5} thresholds of significance provided that the project does not:

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

Some PM₁₀ and PM_{2.5} emissions during project construction can be reduced through compliance with institutional requirements for dust abatement and erosion control. These institutional measures include the SMAQMD "District Rule 403-Fugitive Dust" and measures in the Sacramento County Code relating to land grading and erosion control [Title 16, Chapter 16.44, Section 16.44.090(K)].

The project site is less than 35 acres (4.88 net acres; 5.87 gross acres) and does not involve buildings more than 4 stories tall; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. A limited amount of demolition activities will occur on-site with the removal of two structures and one modular totaling approximately 7,855 square feet. Therefore, the project falls below the SMAQMD Guide screening criteria for PM₁₀ and PM_{2.5}. The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. These requirements are already required by existing rules and regulations, and have also been included as mitigation.

CONSTRUCTION OZONE PRECURSOR EMISSIONS (NO_x)

The SMAQMD Guide currently provides screening criteria for construction-related ozone precursor emissions (NO_x) similar to those which will be implemented for particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction NO_x thresholds of significance provided that the project does not:

1. Include buildings more than 4 stories tall;
2. Include demolition activities;
3. Include significant trenching activities;

4. Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
5. Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills);
6. Require import or export of soil materials that will require a considerable amount of haul truck activity; or,
7. Require soil disturbance (i.e., grading) that exceeds 15 acres per day. Note that 15 acres is a screening level and shall not be used as a mitigation measure.

The screening criteria for construction emissions related to both particulate matter and ozone precursors are almost identical, as shown above. As noted, the Grace Bible Church project site is less than 35 acres (4.88 net acres; 5.87 gross acres) and does not involve buildings more than 4 stories tall; significant trenching activities; an unusually compact construction schedule; or, import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project falls below the SMAQMD Guide screening criteria for construction emissions related to both Particulate Matter and Ozone precursors and impacts are **less than significant**.

OPERATIONAL EMISSIONS/LONG-TERM IMPACTS

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

Typically, a project must be comprised of large acreages or intense uses in order to result in significant operational air quality impacts. For ozone precursor emissions, the screening table in the SMAQMD Guide allows users to screen out projects that include up to 209 ksf (thousand square feet) for places of worship projects and up to 4,350 students for school projects. For particulate matter emissions, the screening table allows users to screen out projects that include up to 515 ksf for places of worship projects and up to 9,100 students for school projects. The proposed expansion of the existing Private K-12 School and Church consists of approximately 25,000 square feet of new building area and up to 300 students maximum attending the school. Thus, the proposed project is below these screening thresholds. Additionally, both uses will operate at different times, with the school use operating during the weekday and the church use operating on weekends. Impacts related to operational emissions are **less than significant**.

CRITERIA POLLUTANT HEALTH RISKS

All criteria air pollutants can have human health effects at certain concentrations. Air Districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the national ambient

air quality standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The NAAQS and CAAQS are informed by a wide range of scientific evidence, which demonstrates that there are known safe concentrations of criteria air pollutants. Because the NAAQS and CAAQS are based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of these standards, the thresholds established by air districts are also protective of human health. Sacramento County is currently in nonattainment of the NAAQS and CAAQS for ozone. Projects that emit criteria air pollutants in exceedance of SMAQMD's thresholds would contribute to the regional degradation of air quality that could result in adverse human health impacts.

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

HEALTH EFFECTS SCREENING

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

Both the Minor Project Health Screening Tool and Strategic Area Project Health Screening Tool are based on the maximum thresholds of significance adopted within the five air district regions contemplated within SMAQMD's *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (SMAQMD's Friant Guidance; October 2020). The air district thresholds considered in SMAQMD's Friant Guidance included thresholds from SMAQMD as well as the El Dorado County Air Quality Management District, the Feather River Air Quality Management District, the Placer County Air Pollution Control District, and the Yolo Solano Air Quality Management District. The highest allowable emission rates of NO_x, ROG, PM₁₀, and PM_{2.5} from the five air districts is 82 pounds per day (lbs/day) for all four pollutants. Thus, the Minor Project Health Screening Tool is intended for use by projects that would result in emissions at or below 82 lbs/day, while the Strategic Area Project Health Screening Tool is intended for use by projects that would result in emissions between two and eight times greater than 82 lbs/day. The Strategic Area Project Screening Model was prepared by SMAQMD for five locations throughout the Sacramento region for two scenarios: two times and eight times the threshold of significance level (2xTOS and 8xTOS). The corresponding emissions levels included in the model for 2xTOS were 164 lb/day for ROG and NO_x, and 656 lb/day under the 8xTOS for ROG and NO_x (SMAQMD 2020).

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

year of exposure at the maximum daily average of the increases in air pollution concentration... [and] [t]he health effects are calculated for emissions levels that are very high” (SMAQMD 2020).

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

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

DISCUSSION OF PROJECT IMPACTS: CRITERIA POLLUTANT HEALTH RISKS

Since the project was below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Table IS-7 and Table IS-8.

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

PM _{2.5} Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidence s Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
		(Mean)	(Mean)		
Respiratory					
Emergency Room Visits, Asthma	0 - 99	0.83	0.76	0.0041%	18419
Hospital Admissions, Asthma	0 - 64	0.052	0.048	0.0026%	1846
Hospital Admissions, All Respiratory	65 - 99	0.36	0.32	0.0016%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.19	0.18	0.00074%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000068	0.000061	0.0016%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0059	0.0055	0.0018%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.016	0.015	0.0020%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.026	0.025	0.0020%	1239

Acute Myocardial Infarction, Nonfatal	65 - 99	0.12	0.11	0.0022%	5052
Mortality					
Mortality, All Cause	30 - 99	2.4	2.2	0.0048%	44766
Notes:					
<ol style="list-style-type: none"> 1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function. 2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region. 3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP. 4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context. 5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the <i>Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District</i>. 					

Table IS-8: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5} (Mean)	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ² (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.085	0.069	0.00035%	19644
Emergency Room Visits, Asthma	0 - 17	0.31	0.25	0.0043%	5859
Emergency Room Visits, Asthma	18 - 99	0.54	0.45	0.0036%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.054	0.046	0.00015%	30386

Notes:

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

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

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

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

NOISE

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

- Result in exposure of persons to, or generation of, noise levels in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies and results in a substantial temporary increase in ambient noise levels in the project vicinity.

Noise is defined as unwanted sound. Sound is a rapid fluctuation of air pressure above and below atmospheric pressure. Sound levels are measured and expressed in decibels (dB) and 0 dB corresponding roughly to the threshold of hearing. The ambient noise level is defined as the noise from all sources near and far, and refers to the noise levels that are present before a noise source being studied is introduced. A synonymous term is pre-project noise level. To protect citizens and visitors of the County from unhealthy or inappropriate noise levels, the General Plan contains a Noise Element with policies designed to control or abate noise.

COUNTY GENERAL PLAN NOISE ELEMENT

The goals of the Sacramento County General Plan Noise Element are to: (1) protect the citizens of Sacramento County from exposure to excess noise and (2) protect the economic base of Sacramento County by preventing incompatible land uses from

encroaching upon existing planned noise-producing uses. The General Plan defines a noise sensitive outdoor area as the primary activity area associated with any given land use at which noise sensitivity exists. Noise sensitivity generally occurs in locations where there is an expectation of relative quiet, or where noise could interfere with the activity which takes place in the outdoor area. An example is a backyard, where loud noise could interfere with the ability to engage in normal conversation.

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

NO-5. The interior and exterior noise level standards for noise-sensitive areas of new uses affected by existing non-transportation noise sources in Sacramento County are shown by Table 2 (see Table IS-9). Where the noise level standards of Table 2 (see Table IS-9) are predicted to be exceeded at a proposed noise-sensitive area due to existing non-transportation noise sources, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 2 (see Table IS-9) standards within sensitive areas.

**Table IS-9: Noise Element Table 2
Non-Transportation Noise Standards Median (L₅₀)/Maximum (L_{max})**

New Land Use	Outdoor Area		Interior
	Daytime	Nighttime	Day and Night
All Residential	55 / 75	50 / 70	35 / 55
Transient lodging ⁴	55 / 75	---	35 / 55
Hospitals and nursing homes ^{5,6}	55 / 75	---	35 / 55
Theaters and auditoriums ⁶	---	---	30 / 50
Churches, meeting halls, schools, libraries, etc. ⁶	55 / 75	---	35 / 60
Office buildings ⁶	60 / 75	---	45 / 65
Commercial buildings ⁶	---	---	45 / 65
Playgrounds, parks, etc ⁶	65 / 75	---	---
Industry ⁶	60 / 80	---	50 / 70

a. The Table 2 standards shall be reduced by 5 dB for sounds consisting primarily of speech or music, and for recurring impulsive sounds. If the existing ambient noise level exceeds the standards of Table 2, then the noise level standards shall be increased at 5 dB increments to encompass the ambient.

b. Sensitive areas are defined in the acoustic terminology section.

c. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.

d. Outdoor activity areas of transient lodging facilities are not commonly used during nighttime hours.

e. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.

f. The outdoor activity areas of these uses (if any), are not typically utilized during nighttime hours.

g. Where median (L₅₀) noise level data is not available for a particular noise source, average (Leq) values may be substituted for the standards of this table provided the noise source in question operates for at least 30 minutes of an hour. If the source in question operates less than 30 minutes per hour, then the maximum noise level standards shown would apply.

NO-6. Where a project would consist of or include non-transportation noise sources, the noise generation of those sources shall be mitigated so as not exceed the interior

and exterior noise level standards of Table 2 (see Table IS-9) at existing noise-sensitive areas in the project vicinity.

NO-7. The “last use there” shall be responsible for noise mitigation. However, if a noise-generating use is proposed adjacent to lands zoned for uses which may have sensitivity to noise, then the noise generating use shall be responsible for mitigating its noise generation to a state of compliance with the Table 2 (see Table IS-9) standards at the property line of the generating use in anticipation of the future neighboring development.

NO-8. Noise associated with construction activities shall adhere to the County Code requirements. Specifically, Section 6.68.090(e) addresses construction noise within the County.

NO-13. Where noise mitigation measures are required to satisfy the noise level standards of this Noise Element, emphasis shall be placed on the use of setbacks and site design to the extent feasible, prior to consideration of the use of noise barriers.

PROJECT IMPACTS

According to a noise manual prepared by Bollard & Brennan in 2005, children playing on school playgrounds, at neighborhood parks, and in daycare centers are often considered potentially significant noise sources, which could adversely affect adjacent noise-sensitive land uses. Typical noise levels associated with groups of approximately 50 children playing at a distance of 50 feet generally range from 55 to 60 dB Leq, with maximum noise levels ranging from 70 to 75 dB. Given the proximity of most schools, parks and daycare centers to residential uses, the potential for exceedance of the County’s Noise Ordinance and Noise Element standards exists, depending on the orientation and proximity of the play areas to those nearest residences, the number of children using the play areas at a given time, and the types of activities the children are engaged in.

The proposed project is located adjacent to an existing single-family residential neighborhood to the east of the site. The proposed project will include two playground areas; an open play area proposed with a maximum of 60 children at a given time, and the relocation of the elementary school age (5-12 years old) playground with a maximum of 30 children at a given time. An existing preschool age (2-5 years old) playground with a maximum of 30 children will remain at its current location east of the fellowship hall and is oriented north of the residential neighborhood. The closest residential property line to the proposed play areas is approximately 84 feet. Based upon the above noise levels, the proposed project complies with the County Noise Standards for outdoor and interior noise levels of non-transportation noise source play areas adjacent to residential uses. Additionally per the project exhibits, a typical concrete fence will be located along the project parking lot areas separating existing single-family residences. This will further reduce noise through attenuation. Parking lot 3 is proposed to be located between the adjacent single-family residential neighborhood and the playground, picnic area, and open play area. There are some small portions where wooden fencing would be used to preserve the health of native oak trees, but this will have minimal effect on the noise

attenuation provided by the concrete fence. Project impacts related to noise is ***less than significant***.

HYDROLOGY AND WATER QUALITY

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

- Alter the existing drainage patterns in such a way that it causes flooding;
- Contribute runoff that would exceed the capacity of existing or planned stormwater infrastructure;
- Place housing within the 100-year floodplain;
- Place structures in a 100-year floodplain that would cause substantial impacts as a result of impeding or redirecting flood flows;
- Develop in an area that is subject to 200 year urban levels of flood protection (ULOP), or;
- Expose people or structures to substantial loss of life, health, or property as a result of flooding.

The project site is located within an area identified on the FEMA FIRM Panel Number 06067C011H and 06067C0113H as “Zone X,” 500-year floodplain,” which indicates there is a less than 0.2 percent chance of a flood event occurring on the site for any given year. The project site is also located within the Arcade Creek South Branch watershed. The project site and surrounding area is not located within the local flood hazard zone. A preliminary Level 3 drainage study was prepared for the proposed project by RFE Engineering, Incorporated (see Appendix A). Plate IS-5 is the Master Grading, Drainage, and Paving Plan Exhibit included with the drainage study.

According to the drainage study, the site’s natural topography decreases from north to south and in its existing condition, there are three drainage shed areas that discharge in different parts of the site. The proposed project grading will direct most of the on-site drainage to a combination of above ground bio-retention planters and flow-based bio-retention structures. The bio-retention planters will filter and infiltrate most of the drainage during smaller rainfall events. The bio-retention structures will filter pollutants out of the stormwater before conveying the runoff to the on-site storm drain network. During larger storm events, the bio-retention planters will pond and overflow into catch basins that will then convey the runoff to the on-site storm drain system.

A small amount of on-site area will sheet flow off-site, where it will be collected by the public storm drain system on Hazel Avenue. This area will be smaller than the existing area that currently sheet flows off-site. The proposed project will have two primary discharge points that are similar to the existing condition on-site. There will be one connection to the existing public storm drain system on Aerobee Avenue and one to an

existing 18" pipe that connects to the underground system on Cedarvillage Drive. The estimated impervious area due to the proposed project for the subject parcels is approximately 72.3% of the site area.

The proposed project and associated drainage study were reviewed by the County Department of Water Resources (DWR) for issues related to drainage on the project site and onto neighboring properties. DWR staff (Durkee) determined that the preliminary drainage study meets County requirements; however conditions of approval for the project include a request for a more detailed (Level 4) drainage study for review and approval by DWR prior to submission of improvement and grading plans. A Level 4 drainage study is typically a refined planning level analysis that provides more detailed design information. No new drainage impacts are identified at this level of analysis. The project will also be subject to the County Improvement Standards, the Water Agency Code, and the Floodplain Management Ordinance, including conditions requiring minimum pad/floor elevations and requiring commercial parking and drive areas to be constructed no lower than one foot below the 100-year floodplain. The project's drainage improvements may be phased, and if so, each phase will be required to provide a standalone Level 4 drainage study consistent with the Level 3 drainage study and all applicable standards. With DWR's review and conditions, project impacts related to drainage are ***less than significant***.

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

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

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

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

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

Applicable projects applying for a County grading permit must show proof that a WDID# has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure

sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components. The project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's CGP.

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

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

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

If sediment-laden or otherwise polluted runoff discharges from the construction site are found to impact the County's storm drain system and/or Waters of the State, the property owner will be subject to enforcement action and possible fines by the County and the Regional Water Board. Project compliance with requirements outlined above, as administered by the County and the Regional Water Board will ensure that project-related erosion and pollution impacts are ***less than significant***.

OPERATION: STORMWATER RUNOFF

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

The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Source control BMPs are

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

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

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

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

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

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

BIOLOGICAL RESOURCES

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

- Have a substantial effect on a special status species, sensitive habitat, or protected wetland;
- If it would interfere substantially with the movement of wildlife; or
- If it would conflict with applicable ordinances, policies, or conservation plans.

NATIVE TREES

Over the years, a significant number of trees have been removed throughout Sacramento County to facilitate urban development, to accommodate agriculture, to provide fuel wood, or to be milled into building materials. It is clear that with continued urban and rural development, the County's woodlands and the variety of species they support will disappear unless concerted efforts are pursued to protect this valuable resource.

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

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

CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

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

Project Tree Setting

An arborist report was prepared for the project site by Mark Frizzell of Tree Solutions dated May 28, 2020 (Appendix B). The arborist report information included the tree species, diameter at breast height (dbh), number of stems, canopy radius (dripline), height, vigor, structural integrity, overall health condition rating, and specific defects related to the condition of each tree. A total of 72 trees were included in the report, 9 of

which are native oaks and 63 of which are non-native. Native oak tree species consist of Valley Oak (*Quercus lobata*) and Blue Oak (*Quercus douglasii*). Non-native tree species consist of Linden, London Plane, Olive, Mulberry, Pecan, Elm, Pistache, Redwood, Cedar, Aleppo Pine, Pin Oak, Evergreen Ash, Flowering Pear, and Trident Maple. See Plate IS-6 for the specific location of all trees on-site and the approximate encroachment percentages of on-site native oak trees.

Native Oak Trees

The arborist report identifies a total of 9 native oak trees on-site, with one of these trees removed due to the widening of Hazel Avenue by the Sacramento County Department of Transportation (SacDOT). Six of the native oak trees within the project limits are considered heritage trees, which are native oaks at or over 19" dbh. The overall condition of these native oak trees varies, but the majority are either in fair or good condition. See Table IS-10 for a listing of all on-site native oak trees identified in the arborist report.

The project will encroach upon two native oak trees, both of which are heritage trees, due to construction associated with the proposed project. These trees include Tree No. 8 – 23" dbh Valley Oak and Tree No. 16 – 22" dbh Valley Oak. The native oak trees will have partial encroachment at 36.6% and 43.8%, respectively, due to improvements for a proposed parking lot area at the southern and eastern ends of the project site. Approximately 6 on-site native oak trees will have encroachment at under 20% due to the proposed project. No native oaks trees are proposed for removal due to the proposed project.

Mitigation is required to compensate for the partial encroachment of two heritage native oak trees on-site. Standard mitigation for native oak tree encroachment and construction protection is included to ensure impacts related to native oak trees from the proposed project are ***less than significant***.

Table IS-10: Native Oak Trees On-Site

Tree #	Common Oak Name	Dripline/ Canopy Radius	dbh	Vigor/Structural Integrity	Action	Encroachment	Mitigation
2	Blue Oak	32 ft.	30"	Fair/Fair Overall Condition Rating 3 (Fair)	Retain	16.4%	Protective Measures
7	Valley	48 ft.	30"	Fair/Fair Overall Condition Rating 3 (Fair)	Retain	16.6%	Protective Measures
8	Valley	41 ft.	23"	Fair/Poor Overall Condition Rating 2 (Poor)	Retain	36.6%	8.4" & Protective Measures
11	Valley	28 ft.	8"	Good/Fair Overall Condition Rating 4 (Good)	Retain	7.1%	Protective Measures
12	Valley	30 ft.	10"	Good/Fair Overall Condition Rating 3 (Fair)	Retain	17.5%	Protective Measures
15	Valley	60 ft.	31"	Fair/Fair Overall Condition Rating 3 (Fair)	Retain	13.4%	Protective Measures
16	Valley	42 ft.	22"	Fair/Fair Overall Condition Rating 3 (Fair)	Retain	43.8%	9.6" & Protective Measures
17	Valley	53 ft.	21"	Fair/Good Overall Condition Rating 4 (Good)	Retain	5.7%	Protective Measures
19	Valley	45 ft.	36"	Fair/Very Poor Overall Condition Rating 2 (Poor)	Removed by County due to Road Widening	N/A	N/A
Total							18" inches

NON-NATIVE TREES AND TREE CANOPY

The Sacramento County General Plan Conservation Element contains several policies aimed at preserving tree canopy within the County. These are:

CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.

CO-146. If new tree canopy cannot be created on-site to mitigate for the non-native tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.

CO-147. Increase the number of trees planted within residential lots and within new and existing parking lots.

CO-149. Trees planted within new or existing parking lots should utilize pervious cement and structured soils in a radius from the base of the tree necessary to maximize water infiltration sufficient to sustain the tree at full growth.

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. The list includes more than seventy trees, so is not included here, but it is available at <http://www.planning.saccounty.net/> under the “Environmental Documents CEQA/NEPA Overview heading. Policy CO-146 references the Greenprint program, which is run by the Sacramento Tree Foundation and has a goal of planting five million trees in the Sacramento region.

The project site contains approximately 63 non-native trees, the majority of which are located on the vacant parcel at the southern portion of the site. See Appendix C for a listing of all on-site non-native trees identified in the arborist report. A total of 27 non-native trees will remain on the site and will be incorporated with the proposed project. A total of 36 non-native trees are proposed for removal due to the proposed project, consisting of Linden, London Plane, Olive, Pecan, Elm, Redwood, Mulberry, Pin Oak, Evergreen Ash, Flowering Pear, and Trident Maple species. Of the 36 non-native trees identified in the arborist report that are proposed for removal, the trees range in individual size from a dripline canopy radius of 10± to 60± feet. Ten of the trees have a dripline canopy radius at or over 30 feet, indicating the maturity of these trees. The majority of the non-native trees proposed for removal were identified in the arborist report as in good to fair condition, with seven trees identified in poor condition.

County PER staff calculated the tree canopy for individual non-native trees proposed for removal from the circle area radius formula ($A = \pi r^2$). Where non-native trees proposed for removal were clustered with tree canopies overlapping, measurements were calculated for the tree canopy removal through the use of aerial photography. Total non-

native tree canopy loss on-site due to the proposed removal of 36 non-native trees will be approximately 35,664 square feet. To compensate for the loss of non-native tree canopy, tree plantings consistent with General Plan policy CO-145 will be required. This will be accomplished by planting enough trees from the County's approved landscape tree list so that planted trees yield an equivalent amount of canopy utilizing the 15 year shade values. Mitigation will require either on-site replanting of non-native trees to the greatest extent feasible, or payment into the Greenprint program. The preliminary landscape plan exhibit indicates that the total planting area for the project will be approximately 26,793 square feet. Mitigation is not required for all tree canopy proposed for removal; it is only required for tree canopy that will not be replaced with new landscaping. With mitigation, impacts associated with non-native tree canopy removal are ***less than significant with mitigation.***

SPECIAL STATUS SPECIES

NESTING BIRDS OF PREY

This section addresses raptors which are not listed as endangered, threatened, or of special concern, but are nonetheless afforded general protections by the Fish and Game Code. Raptors and their active nests are protected by the California Fish and Game Code Section 3503.5, which states: It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey, or raptors) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Section 3(19) of the Federal Endangered Species Act defines the term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered “take.” Thus, take may occur both as a result of cutting down a tree or as a result of activities nearby an active nest which cause nest abandonment.

Raptors within the Sacramento region include tree-nesting species such as the red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as “special animals” due to concerns over nest disturbance: Cooper’s hawk, sharp-shinned hawk, golden eagle, northern harrier, and white-tailed kite.

The project site contains numerous mature trees that could serve as suitable habitat for nesting raptors. If present, nesting raptors can be disturbed by construction equipment if appropriate measures are not taken. To avoid impacts to nesting raptors, particularly prior to tree removal, mitigation involves pre-construction nesting surveys to identify any active nests and to implement avoidance measures if nests are found – if construction will occur during the nesting season of March 1 to September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. Mitigation will ensure that impacts to nesting raptors will be ***less than significant***.

MIGRATORY BIRDS

The Migratory Bird Treaty Act of 1918, which states “unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill” a migratory bird. Section 3(19) of the Federal Endangered Species Act defines the term “take” to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered “take.”

The project site contains numerous mature trees that could serve as suitable habitat for migratory birds. If present, migratory birds can be disturbed by construction equipment if appropriate measures are not taken. To avoid take of nesting migratory birds, particularly prior to tree removal, mitigation has been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. Impacts to migratory birds are **less than significant**.

TRIBAL CULTURAL RESOURCES

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

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with a cultural value to a California Native American tribe, that is:

Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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

TRIBAL CULTURAL RESOURCE SETTING

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects on January 12, 2021. No requests for consultation were received. E-mail correspondence from the United Auburn Indian Community of the Auburn Rancheria (UAIC) tribe representatives dated January 21, 2021 stated that their records do not indicate that the project area is sensitive for tribal cultural resources, but requested mitigation for the unanticipated discoveries of tribal cultural resources.

DISCUSSION OF PROJECT IMPACTS – TRIBAL CULTURAL RESOURCES

Through consultation under CEQA, tribes confirmed that the project area does not contain tribal cultural resources of significance. Mitigation is required for the inadvertent discovery of cultural resources, including tribal cultural resources, during ground

disturbance and project construction. With this mitigation in place, project impacts to tribal cultural resources will be ***less than significant***.

GREENHOUSE GAS EMISSIONS

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

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

REGULATORY BACKGROUND

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this establishes a broad framework for the State's long-term GHG reduction and climate change adaptation program. Of particular importance is AB 32, which establishes a statewide goal to reduce GHG emissions back to 1990 levels by 2020, and Senate Bill (SB) 375 supports AB 32 through coordinated transportation and land use planning with the goal of more sustainable communities. SB 32 extends the State's GHG policies and establishes a near-term GHG reduction goal of 40% below 1990 emissions levels by 2030. Executive Order (EO) S-03-05 identifies a longer-term goal for 2050.¹

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

In November of 2011, Sacramento County approved the Phase 1 Climate Action Plan Strategy and Framework document (Phase 1 CAP), which is the first phase of developing a community-level Climate Action Plan. The Phase 1 CAP provides a framework and overall policy strategy for reducing greenhouse gas emissions and managing our resources in order to comply with AB 32. It also highlights actions already taken to become more efficient, and targets future mitigation and adaptation strategies. This document is available at http://www.green.saccounty.net/Documents/sac_030843.pdf. The CAP contains policies/goals related to agriculture, energy, transportation/land use, waste, and water.

Goals in the section on agriculture focus on promoting the consumption of locally-grown produce, protection of local farmlands, educating the community about the intersection of agriculture and climate change, educating the community about the importance of open space, pursuing sequestration opportunities, and promoting water conservation in agriculture. Actions related to these goals cover topics related to urban forest management, water conservation programs, open space planning, and sustainable agriculture programs.

Goals in the section on energy focus on increasing energy efficiency and increasing the usage of renewable sources. Actions include implementing green building ordinances

¹ EO S-03-05 has set forth a reduction target to reduce GHG emissions by 80 percent below 1990 levels by 2050. This target has not been legislatively adopted.

and programs, community outreach, renewable energy policies, and partnerships with local energy producers.

Goals in the section on transportation/land use cover a wide range of topics but are principally related to reductions in vehicle miles traveled, usage of alternative fuel types, and increases in vehicle efficiency. Actions include programs to increase the efficiency of the County vehicle fleet, and an emphasis on mixed use and higher density development, implementation of technologies and planning strategies that improve non-vehicular mobility.

Goals in the section on waste include reductions in waste generation, maximizing waste diversion, and reducing methane emissions at Kiefer landfill. Actions include solid waste reduction and recycling programs, a regional composting facility, changes in the waste vehicle fleet to use non-petroleum fuels, carbon sequestration at the landfill, and methane capture at the landfill.

Goals in the section on water include reducing water consumption, emphasizing water efficiency, reducing uncertainties in water supply by increasing the flexibility of the water allocation/distribution system, and emphasizing the importance of floodplain and open space protection as a means of providing groundwater recharge. Actions include metering, water recycling programs, water use efficiency policy, water efficiency audits, greywater programs/policies, river-friendly landscape demonstration gardens, participation in the water forum, and many other related measures.

The Phase 1 CAP is a strategy and framework document. The County adopted the Phase 2A CAP (Government Operations) on September 11, 2012. Neither the Phase 1 CAP nor the Phase 2A CAP are “qualified” plans through which subsequent projects may receive CEQA streamlining benefits. The County is currently developing a Communitywide CAP, which will flesh out the strategies involved in the strategy and framework CAP, and will include economic analysis, intensive vetting with all internal departments, community outreach/information sharing, timelines, and detailed performance measures. The Communitywide CAP is targeted for adoption in Summer 2022.

The commitment to a Communitywide CAP is identified in General Plan Policy LU-115 and associated Implementation Measures F through J on page 117 of the General Plan Land Use Element. This commitment was made in part due to the County’s General Plan Update process and potential expansion of the Urban Policy Area to accommodate new growth areas. General Plan Policies LU-119 and LU-120 were developed with SACOG to be consistent with smart growth policies in the SACOG Blueprint, which are intended to reduce VMT and GHG emissions. This second phase CAP is intended to flesh out the strategies involved in the strategy and framework CAP, and will include economic analysis, intensive vetting with all internal departments, community outreach/information sharing, timelines, and detailed performance measures.

THRESHOLDS OF SIGNIFICANCE

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. The Governor’s Office of Planning and Research’s (OPR’s) Guidance does not include a quantitative threshold of significance to use for

assessing a proposed development's GHG emissions under CEQA. Moreover, CARB has not established such a threshold or recommended a method for setting a threshold for proposed development-level analysis.

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

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

- BMP 1 – no natural gas: projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 – electric vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards.
 - EV Capable requires the installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

Projects that implement BMP 1 and BMP 2 can utilize the screening criteria for operation emissions outlined in Table IS-11. Projects that do not exceed 1,100 metric tons per year are then screened out of further requirements. For projects that exceed 1,100 metric tons per year, then compliance with BMP 3 is also required:

- BMP 3 – Reduce applicable project VMT by 15% residential and 15% worker relative to Sacramento County targets, and no net increase in retail VMT. In areas with above-average existing VMT, commit to provide electrical capacity for 100% electric vehicles.

SMAQMD's GHG construction and operational emissions thresholds for Sacramento County are shown in Table IS-6.

Table IS-11: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	10,000 metric tons per year

PROJECT IMPACTS

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. The project is within the screening criteria for construction related impacts related to air quality. Therefore, construction-related GHG impacts are ***less than significant***.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

The project will implement BMP 1 and BMP 2 in its entirety. As such, the project can be compared to the operational screening table. The proposed project screens out for GHG Emissions based upon the SMAQMD Operational Screening Levels as illustrated below in Table IS-12. The proposed expansion of the existing Private K-12 School and Church consists of approximately 25,000 square feet of new building area and an existing maximum capacity of up to 300 students attending the school. This amount is less than the GHG screening level thresholds in Table IS-12, which were developed by SMAQMD using the California Emissions Estimator Model (CalEEMOD). Thus, the operational emissions associated with the project are less than 1,100 MT of CO₂e per year because the project is below the GHG screening thresholds. Mitigation is included such that the project will implement BMP 1 and BMP 2. The impacts from GHG emissions are ***less than significant with mitigation***.

Table IS-12: SMAQMD GHG Operational Screening Levels

Land Use	GHG Screening Level
Elementary School	57,000 square feet/676 students
High School	53,000 square feet/400 students
Places of Worship	53,000 square feet
Proposed Project	Existing: 28,382 square feet Proposed: 25,000 square feet

	Existing Maximum Capacity for Private School Use: 300 students
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ENVIRONMENTAL MITIGATION MEASURES

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

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

Applicant [Original Signature on File] Date: _____

MITIGATION MEASURE A: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

The following Basic Construction Emissions Control Practices are considered feasible for controlling fugitive dust from a construction site. The practices also serve as best management practices (BMPs), allowing the use of the non-zero particulate matter significance thresholds. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- 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 should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout 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 (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel-powered equipment. The California Air Resources Board (CARB) enforces idling limitations and compliance with diesel fleet regulations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [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.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.

Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic.

MITIGATION MEASURE B: NATIVE OAK TREE ENCROACHMENT

The encroachment of 18 inches dbh of native oak trees (Tree No. 8 – 23" dbh Valley Oak and Tree No. 16 – 22" dbh Valley Oak) shall be compensated for by planting in-kind oak trees equivalent to the dbh inches lost, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. On-site preservation of native oak trees that are less than 6 inches (<6 inches) dbh, may also be used to meet this compensation requirement. Native oak trees include: valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), and blue oak (*Quercus douglasii*). Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. A total of 18 inches will require compensation.

Equivalent compensation based on the following ratio is required:

- one preserved native oak tree < 6 inches dbh on-site = 1 inch dbh
- one D-pot seedling (40 cubic inches or larger) = 1 inch dbh
- one 15-gallon tree = 1 inch dbh
- one 24-inch box tree = 2 inches dbh
- one 36-inch box tree = 3 inches dbh

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

1. Species, size and locations of all replacement plantings and < 6-inch dbh trees to be preserved
2. Method of irrigation

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

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

Native oak trees <6 inches dbh to be retained on-site shall have at least a 20-foot radius suitable root zone. The suitable root zone shall not have impermeable surfaces, turf/lawn, dense plantings, soil compaction, drainage conditions that create ponding (in the case of native oak trees), utility easements, or other overstory tree(s) within 20 feet of the tree to be preserved. Trees to be retained shall be determined to be healthy and structurally sound for future growth, by an ISA Certified Arborist subject to Environmental Coordinator approval.

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

MITIGATION MEASURE C: NATIVE OAK TREE CONSTRUCTION PROTECTION

For the purpose of this mitigation measure, a native oak tree is defined as a valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), and blue oak (*Quercus douglasii*) having a diameter at breast height (dbh) of at least 6 inches, or if it has multiple trunks of less than 6 inches each, a combined dbh of at least 10 inches.

With the exception of the trees compensated for through Mitigation Measure B, above, all native oak trees on the project site (see Table IS-8), all portions of adjacent off-site native oak trees which have driplines that extend onto the project site, and all off-site native oak trees which may be impacted by utility installation and/or improvements associated with this project, shall be preserved and protected as follows:

1. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb shall constitute the dripline protection area of the tree. Limbs must not be cut back in order to change the dripline. The area beneath the dripline is a critical

- portion of the root zone and defines the minimum protected area of the tree. Removing limbs which make up the dripline does not change the protected area.
2. Chain link fencing or a similar protective barrier shall be installed one foot outside the driplines of the native oak trees prior to initiating project construction, in order to avoid damage to the trees and their root system.
 3. No signs, ropes, cables (except cables which may be installed by a certified arborist to provide limb support) or any other items shall be attached to the native trees.
 4. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the driplines of the native oak trees.
 5. Any soil disturbance (scraping, grading, trenching, and excavation) is to be avoided within the driplines of the native oak trees. Where this is necessary, an ISA Certified Arborist will provide specifications for this work, including methods for root pruning, backfill specifications and irrigation management guidelines.
 6. All underground utilities and drain or irrigation lines shall be routed outside the driplines of native oak trees. Trenching within protected tree driplines is not permitted. If utility or irrigation lines must encroach upon the dripline, they should be tunneled or bored under the tree under the supervision of an ISA Certified Arborist.
 7. If temporary haul or access roads must pass within the driplines of native oak trees, a roadbed of six inches of mulch or gravel shall be created to protect the root zone. The roadbed shall be installed from outside of the dripline and while the soil is in a dry condition, if possible. The roadbed material shall be replenished as necessary to maintain a six-inch depth.
 8. Drainage patterns on the site shall not be modified so that water collects or stands within, or is diverted across, the dripline of native oak trees.
 9. No sprinkler or irrigation system shall be installed in such a manner that it sprays water within the driplines of the native oak trees.
 10. Tree pruning that may be required for clearance during construction must be performed by an ISA Certified Arborist or Tree Worker and in accordance with the American National Standards Institute (ANSI) A300 pruning standards and the International Society of Arboriculture (ISA) "Tree Pruning Guidelines".
 11. Landscaping beneath the oak trees may include non-plant materials such as boulders, decorative rock, wood chips, organic mulch, non-compacted decomposed granite, etc. Landscape materials shall be kept two (2) feet away from the base of the trunk. The only plant species which shall be planted within the driplines of the oak trees are those which are tolerant of the natural semi-arid environs of the trees. Limited drip irrigation approximately twice per summer is recommended for the understory plants.
 12. Any fence/wall that will encroach into the dripline protection area of any protected tree shall be constructed using grade beam wall panels and posts or piers set no

closer than 10 feet on center. Posts or piers shall be spaced in such a manner as to maximize the separation between the tree trunks and the posts or piers in order to reduce impacts to the trees.

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

MITIGATION MEASURE D: NON-NATIVE CANOPY REPLACEMENT

Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species. Preference is given to on-site mitigation, but if this is infeasible, then funding shall be contributed to the Sacramento Tree Foundation's Greenprint program in an amount proportional to the tree canopy lost (as determined by the 15-year shade cover calculations for the tree species to be planted through the funding, with the cost to be determined by the Sacramento County Tree Foundation). In order to compensate for the substantial loss of non-native urban tree canopy, approximately 35,664 square feet of tree canopy shall be provided on-site or through funding into the Greenprint program. The non-native trees remaining in place shall not be included as credit towards the tree canopy replacement amount. Note: The project's preliminary landscape plan states that approximately 26,793 square feet of planting area will be provided. The remaining tree canopy replacement amount is approximately 8,871 square feet.

MITIGATION MEASURE E: MIGRATORY BIRD NESTING PROTECTION

To avoid impacts to nesting birds and ensure compliance with the Migratory Bird Treaty Act, implement the following measures:

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and August 31, a survey for active migratory bird nests shall be conducted no more than 14 days prior to construction by a qualified biologist.
2. Trees slated for removal shall be removed during the period of September through January, in order to avoid the nesting season. Any trees that are to be removed during the nesting season, which is February through August, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.
3. If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which has been determined by a qualified biologist, shall be established and

maintained around the nest to prevent nest failure. All construction activities shall be avoided within this buffer area until a qualified biologist determines that nestlings have fledged, or until September 1.

In the event of accidental harm or unavoidable impacts, the California Department of Fish and Wildlife (CDFW) shall be contacted by the project applicant.

MITIGATION MEASURE F: RAPTOR NEST PROTECTION

If construction activity (which includes clearing, grubbing, or grading) is to commence within 500 feet of suitable nesting habitat between March 1 and September 15, a survey for raptor nests shall be conducted by a qualified biologist. The survey shall cover all potential tree habitat on-site and off-site up to a distance of 500 feet from the project boundary. The survey shall occur within 30 days of the date that construction will encroach within 500 feet of suitable habitat. The biologist shall supply a brief written report (including date, time of survey, survey method, name of surveyor and survey results) to the Environmental Coordinator prior to ground disturbing activity. If no active nests are found during the survey, no further mitigation will be required. If any active nests are found, the Environmental Coordinator and California Fish and Wildlife shall be contacted to determine appropriate avoidance/protective measures. The avoidance/protective measures shall be implemented prior to the commencement of construction within 500 feet of an identified nest.

MITIGATION MEASURE G: INADVERTENT DISCOVERY OF CULTURAL RESOURCES OR TRIBAL CULTURAL RESOURCES

In the event that human remains are discovered in any location other than a dedicated cemetery, work shall be halted and the County Coroner contacted. For all other potential tribal cultural resources [TCRs], archaeological, or cultural resources discovered during project's ground disturbing activities, work shall be halted until a qualified archaeologist and/or tribal representative may evaluate the resource.

1. **Unanticipated human remains.** Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop and the County Coroner and the Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.
2. **Unanticipated cultural resources.** In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional

archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.

- a. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
- b. If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

MITIGATION MEASURE H: GREENHOUSE GASES

The project is required to incorporate the Tier 1 Best Management Practices or propose Alternatives that demonstrate the same level of GHG reductions as BMPs 1 and 2, listed below. At a minimum, the project must mitigate natural gas emissions and provide necessary wiring for an all-electric retrofit to accommodate future installation of electric space heating, water heating, drying, and cooking appliances.

Tier 1: Best Management Practices (BMP) Required for all Projects

- BMP 1: No natural gas: Projects shall be designed and constructed without natural gas infrastructure.
- BMP 2: Electric vehicle ready: Projects shall meet the current CalGreen Tier 2 standards, except all EV Capable spaces shall instead be EV Ready.
 - EV Capable requires the installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

MITIGATION MEASURE COMPLIANCE

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is \$5,900.00. This fee includes administrative costs of \$1,039.00.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

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

- 1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.
- 2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.
- 3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. LAND USE - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, Fair Oaks Community Plan, and Sacramento County Zoning Code.
b. Physically disrupt or divide an established community?			X		The project will not create physical barriers that substantially limit movement within or through the community.
2. POPULATION/HOUSING - Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The project will neither directly nor indirectly induce substantial unplanned population growth. A less than significant impact will result.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing. No impact will occur.
3. AGRICULTURAL RESOURCES - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils. No impact will occur.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site. No impact will occur.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production. No impact will occur.
4. AESTHETICS - Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?			X		The project does not occur in the vicinity of any scenic highways, corridors, or vistas. A less than significant impact will result.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?				X	The project is not located in a non-urbanized area. No impact will occur.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity. A less than significant impact will result.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		With the K-12 private school and church use currently in operation, the project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area. A less than significant impact will result.
5. AIRPORTS - Would the project:					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				X	The project occurs outside of any identified public or private airport/airstrip safety zones. No impact will occur.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				X	The project occurs outside of any identified public or private airport/airstrip noise zones or contours. No impact will occur.

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service. A less than significant impact will result.
h. Result in substantial adverse physical impacts associated with the provision of public school services?				X	The project will not require the use of public school services. No impact will occur.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?				X	The project will not require park and recreation services. No impact will occur.
7. TRANSPORTATION - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The project does not conflict with or is inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). The vehicles miles traveled associated with the Private K-12 School and Place of Worship will have minor transportation impacts. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation. A less than significant impact will result.
8. AIR QUALITY - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. A less than significant impact will result.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?			X		The project will not generate objectionable odors. A less than significant impact will result.
9. NOISE - Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The project will generate a noise source that will not exceed applicable standards. Refer to the Noise discussion in the Environmental Effects section above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary. A less than significant impact will result.
10. HYDROLOGY AND WATER QUALITY - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will incrementally add to groundwater consumption; however, the singular and cumulative impacts of the proposed project upon the groundwater decline in the project area are minor. A less than significant impact will result.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area. A less than significant impact will result.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		The project site is not within a 100-year floodplain. A less than significant impact will result.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?			X		The project is not located in an area subject to 200-year urban levels of flood protection (ULOP). A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. A less than significant impact will result.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards. A less than significant impact will result.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality. A less than significant impact will result.
11. GEOLOGY AND SOILS - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?			X		The project is not located on an unstable geologic or soil unit. A less than significant impact will result.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		A public sewer system is available to serve the project. A less than significant impact will result.
e. Result in a substantial loss of an important mineral resource?			X		The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site. A less than significant impact will result.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location. A less than significant impact will result.
12. BIOLOGICAL RESOURCES - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?			X		No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations. A less than significant impact will result.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		No protected surface waters are located on or adjacent to the project site. A less than significant impact will result.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected. A less than significant impact will result.
e. Adversely affect or result in the removal of native or landmark trees?		X			Native and/or landmark trees occur on the project site and/or may be affected by on and/or off-site construction. Mitigation is included to ensure impacts are less than significant. Refer to the Biological Resources discussion in the Environmental Effects section above.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources. A less than significant impact will result.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		There are no known conflicts with any approved plan for the conservation of habitat. A less than significant impact will result.
13. CULTURAL RESOURCES - Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		The Northern California Information Center was contacted regarding the proposed project. The record search did not identify qualified historic resources. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on an archaeological resource?			X		The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources. A less than significant impact will result.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation. A less than significant impact will result.
14. TRIBAL CULTURAL RESOURCES - Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was not received. Tribal cultural resources have not identified in the project area. Refer to the Cultural Resources discussion in the Environmental Effects section above.
15. HAZARDS AND HAZARDOUS MATERIALS - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material. A less than significant impact will result.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material. A less than significant impact will result.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X		The project does not involve the use or handling of hazardous material. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The project is not located on a known hazardous materials site. A less than significant impact will result.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan. A less than significant impact will result.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires. A less than significant impact will result.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		While the project will expand an existing K-12 private school and church use and increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are met resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements. A less than significant impact will result.
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X			The project will not have the potential to interfere with the County meeting the goals of AB 32 (reducing greenhouse gas emissions to 1990 levels by 2020); therefore, the climate change impact of the project is considered less than significant.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose of reducing the emission of greenhouse gases. A less than significant impact will result.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	LDR and MDR (Low Density Residential and Medium Density Residential)	X		
Community Plan	RD-5, RD-5 (PQP) and RD-20 (PQP) (Residential Density 5, Residential Density 5/Public-Quasi Public, Residential Density 20/Public-Quasi Public)	X		
Land Use Zone	RD-5 and RD-20 (Residential Density 5 and Residential Density 20)	X		

APPENDICES

Appendix A: A Drainage Report titled *Preliminary Drainage Study and Stormwater Quality Control Plan for Grace Bible Church* prepared by RFE Engineering, Incorporated dated January 17, 2022

Appendix B: An Arborist Report prepared by Mark Frizzell: Tree Solutions dated May 28, 2020

Appendix C: List of Non-Native Trees On-Site prepared by Sacramento County Planning and Environmental Review (PER)

INITIAL STUDY PREPARERS

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