



## MEMORANDUM

**DATE:** September 16, 2022 (revised)

**To:** Iqra Anwar, PLA, CPSI, Callander Associates

**FROM:** Kat Hughes, Senior Environmental Planner  
Kristin Nurmela, Associate

**SUBJECT:** Rio Linda Elverta Recreation and Park District Categorical Exemption for Westside Park Improvements Project

LSA has prepared this memorandum documenting the Rio Linda Elverta Recreation and Park District's (District) decision to process the Westside Park Improvements Project (project) under a Categorical Exemption pursuant to Sections 15301(c) and (d), 15303(e), and 15304(b) of the California Environmental Quality Act (CEQA) Guidelines.

### PROJECT LOCATION AND EXISTING CONDITIONS

Westside Park is located at 6601 West 2nd Street, Rio Linda, in Sacramento County (County), assessor parcel numbers (APNs) 206-0200-040 and 206-0200-041. Westside Park is one of nine parks within the District that is in need of park improvements. The existing 7.28-acre park includes a baseball/softball field, sand volleyball courts, dog park, restroom building, and parking lot. The park also shares a play area with an adjacent elementary school.

### PROPOSED PROJECT

The District is proposing improvements to the existing Westside Park. The project goal is to convert the existing sand volleyball courts to a family gathering area which would include a shade structure, picnic tables, and BBQ grills. Other proposed improvements include removing the single stall restroom building and replacing it with a multi-stall restroom and storage building, and adding walkway connections and bike racks. The remaining portion of the sand volleyball courts would be converted into a lawn area with shade trees as a future phase. Construction activities are anticipated to occur between January 2023 and June 2023.

### CATEGORICAL EXEMPTIONS

The following categorical exemptions are applicable to the proposed project, as further discussed below.

### **Class 1: Existing Facilities**

Section 15301 of the CEQA Guidelines, Existing Facilities, applies to the “minor alteration of existing public...facilities...involving negligible or no expansion of existing or former use.”

- Section 15301(c) applies to “Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes alterations such as the addition of bicycle facilities);”
- Section 15301(d) applies to “Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety.”

The project would qualify for a Class 1 exemption as described above. The project would add bicycle parking, improvements to sidewalks, would improve the underused and deteriorating sand volleyball courts, and would reconstruct a bathroom facility with one to two more stalls than the existing facility. The size and capacity of the park would not increase, and there would not be any expansion of use beyond existing conditions. Therefore, the proposed project would comply with the requirements of both subsection C and subsection D of the Class 1 exemption.

### **Class 3: New Construction or Conversion of Small Structures**

Section 15303 of the CEQA Guidelines, New Construction or Conversion of Small Structures, applies to the “construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another.”

- Section 15303(e) applies to “accessory (appurtenant) structures including... patios, swimming pools, and fences” as examples.

The project would qualify for a Class 3 exemption as described above. The project would add a small shade structure and six picnic tables, two BBQs, and two benches. The proposed structures are small in size and quantity. Therefore, the proposed project would comply with the requirements of subsection E of the Class 3 exemption.

### **Class 4: Minor Alterations to Land**

Section 15304 of the CEQA Guidelines, Minor Alterations to Land, applies to “minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees.”

- Section 15304(b) applies to “new gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire-resistant landscaping.”

The project would qualify for a Class 4 exemption as described above. The project would replace the sand volleyball court with a lawn, and would place a number of shade trees along the perimeter of the lawn and around the shade structure. There would be no healthy, mature, scenic trees removed,

and new landscaping is proposed. Therefore, the proposed project would comply with the requirements of subsection B of the Class 4 exemption.

## EXCEPTIONS TO CATEGORICAL EXEMPTIONS

The following provides a consistency determination with Section 15300.2 of the CEQA Guidelines, which provides exceptions to the above-noted categorical exemptions, and a brief assessment of the CEQA Guidelines Appendix G Initial Study Checklist resource topics that are applicable to the project (under “Exceptions to Categorical Exemptions” Item C). The CEQA Guidelines list the following exceptions to the Categorical Exemptions in Article 19 (see Section 15300.2). In the discussion below, each subsection (in italics) is followed by an explanation of why these exceptions do not apply to the proposed project.

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

The proposed project would be exempt under Classes 1, 3, and 4. The project is located in an existing District-owned park and would result in the conversion of sand volleyball courts to a family gathering area, as well as other minor improvements to existing facilities. The project is not located in a sensitive environment and would not impact an environmental resource of hazardous or critical concern.

- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The proposed project would be implemented within an existing District-owned park and would better serve existing park users. The proposed project would not result in long-term or growth inducing impacts; all temporary construction impacts would be less than significant with the implementation of best management practices (BMPs) and standard specifications. While various transportation, residential, and/or commercial development projects can be expected to be implemented in the region and/or vicinity of the project area, these projects would undergo their own CEQA reviews that require mitigation measures for significant impacts. Construction of the proposed project and these other foreseeable projects would result in less-than-significant cumulative impacts because construction activities would be short-term and mitigated as required based on environmental review. Thus, contributions to potential cumulative impacts would not be cumulatively considerable.

- (c) Significant Effect. A categorical exception shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

No unusual circumstances have been identified in or around the project site that would result in significant environmental impacts.

Based on the field review of the project area, and review of pertinent literature, the potential for significant adverse environmental impacts as defined under CEQA is negligible. The proposed project improvements would occur within an existing District-owned park, which currently consists of sand volleyball courts, a softball/baseball field, dog park, restroom building, and parking lot. There would be no tree removals. The following discussion summarizes the potential effects of the project according to resource topics included in Appendix G of the CEQA Guidelines.

### **Aesthetics**

The proposed project would convert the existing sand volleyball courts to a family gathering area which would include a shade structure, picnic tables, and BBQ grills. Other proposed improvements include removing the single stall restroom building and replacing it with a multi-stall restroom and storage building, and adding walkway connections and bike racks. While a new restroom and shade structure would introduce new visual elements in the project area, it would be consistent with the visual character of the park and would not result in a significant impact to the visual character of the park or the surrounding neighborhood. The proposed project is not located within a scenic highway, nor would it introduce a new source of light or glare. Therefore, the proposed project would not result in impacts related to aesthetics.

### **Agriculture and Forestry Resources**

According to the California Department of Conservation Important Farmland Finder (<https://maps.conservation.ca.gov/DLRP/CIFF/>), the project area is categorized as “Urban and Built-Up Land.” There are no forestry resources within the project area; therefore, the project would not impact agriculture or forestry resources.

### **Air Quality**

The limited scale of the project and resulting limited construction trips would not result in any adverse air quality impacts. Because project construction associated with the proposed project would be temporary, the operation of construction equipment would be of limited duration and would not result in generation of air quality emissions that would conflict with an air quality plan. As the project would not generate additional vehicle trips beyond existing levels or increase parking capacity, no long-term regional emissions would be associated with project-related vehicle trips. Project plans would include standard dust control specifications including preparation of and compliance with an approved fugitive dust control plan as required by the Sacramento Metropolitan Air Quality Management District. Furthermore, operation of the proposed project would not conflict with an air quality plan nor would it result in a cumulatively considerable net increase in criteria pollutants. Therefore, the proposed project would not result in air quality impacts.

### Biological Resources

The developed park site does not contain suitable habitat for any special-status plant or wildlife species, and no work would occur within any sensitive natural community or regulated wetlands or other waters. Because the proposed project does not include the removal of any trees, no direct impacts to nesting birds protected under the federal Migratory Bird Treaty Act or California Fish and Game Code would occur. The potential for indirect impacts (e.g., nest abandonment due to construction-related disturbance) would be low due to the active park setting and the existing levels of disturbance from nearby automobile traffic and park users. The project would not conflict with an adopted Habitat Conservation Plan or other approved local habitat conservation plan. Therefore, the proposed project would not result in impacts to biological resources.

### Cultural Resources

Any excavation required of the proposed project would occur within existing fill and would not impact cultural resources. Project plans would also include standard specifications and procedures in compliance with CCR Section 15064.5(b)(1) for discovery of any cultural resources such as structural features, unusual amounts of bone, shell, artifacts, human remains, or architectural remains. In the case of any such encounter during any work activities, work would be suspended within 100 feet of the find, the District would be notified, and a qualified archaeologist would be consulted for an on-site evaluation. In the event of the discovery of human remains, work would stop and the Sacramento County coroner would be notified, in compliance with California Health and Safety Code Section 7050.5 and CCR Section 15064.5(d). Therefore, the proposed project would not result in impacts to cultural resources.

### Energy

The construction phase of the proposed project would require the operation of construction equipment and vehicles that require energy to operate. Construction of the project is not anticipated to consume large amounts of energy resources nor would it conflict with a State or local renewable energy plan. Operation of the project would not result in changes in energy consumption. Therefore, the proposed project would not result in energy impacts.

### Geology and Soils

The soils in the project area consists of San Joaquin fine sandy loam, 0 to 3 percent slopes. While this soil type is moderately well-drained, the project would be built on pre-disturbed soil and all grading, site compaction, earthwork, trenching, Portland cement concrete, asphalt, aggregate base, subbase, etc. would be performed in accordance with the Uniform Building Code, the latest edition of the County's Improvement Standards (<https://engineering.saccounty.net/Pages/ImprovementStandards.aspx>), and any geotechnical engineering reports prepared for the project. Project plans would also include standard specifications and requirements for erosion control in compliance with the County's current Standard Construction Specifications, as discussed below under Hydrology

and Water Quality. Therefore, the proposed project would not result in impacts related to geology and soils.

### **Greenhouse Gas Emissions**

Operation of construction equipment has the potential to generate greenhouse gas emissions; however, the quantity and type of equipment and the duration with which the equipment would operate during the proposed project construction phase would not result in significant release of greenhouse gas emissions. Park operations would not substantially change as a result of the proposed improvements; therefore, the project would not result in increased greenhouse gas emissions during operation. The proposed project would not result in impacts to greenhouse gas emissions.

### **Hazards and Hazardous Materials**

According to the California Department of Toxic Substances Control EnviroStor website (<https://geotracker.waterboards.ca.gov>), no listed sites are within 1,000 feet of the project area. The project would be constructed in compliance with federal, State, and local regulations, as applicable, and would not result in hazards and hazardous materials impacts. In compliance with Section 10-7 of the County's current Standard Construction Specifications, project plans would include standard specifications for discovery of hazardous substances during construction, including asbestos-containing serpentine rock, and for proper disposal of oils, liquids, and fuels. Therefore, the proposed project would not result in impacts related to hazards and hazardous materials.

### **Hydrology and Water Quality**

According to Flood Insurance Rate Map No. 06067C0054H (dated 8/16/2012), the project area is located within Zone X (an area of minimal flood hazard). The project would convert the existing sand volleyball courts to a family gathering area which would include a shade structure, picnic tables, and BBQ grills. Other proposed improvements include removing the single stall restroom building and replacing it with a multi-stall restroom and storage building, and adding walkway connections and bike racks. The project would be constructed in compliance with federal, State, and local regulations related to water quality. In compliance with Section 10-4 of the County's current Standard Construction Specifications, the Land Grading and Erosion Control Ordinance (Chapter 16.44 of the Sacramento County Code), and the Stormwater Management and Discharge Control Ordinance (Chapter 15.12 of the Sacramento County Code), Project plans would include standard specifications for implementation of storm water, erosion, and sediment control BMPs designed to prevent mud and silt from entering storm runoff and impacting water quality, and compliance with standard site management "housekeeping" measures to prevent storm water pollutant discharges. The project would not conflict with water quality standards, degrade groundwater, substantially alter drainage on- or off-site, or conflict with a water quality control plan or sustainable groundwater control plan. Therefore, the proposed project would not result in hydrology and water quality impacts.

### **Land Use and Planning**

The proposed project would be developed in an existing District-owned park. The project would not include land use or zoning changes and would not conflict with adopted planning documents; rather, these improvements are contemplated and outlined in the District's Master Plan (2006) and Master Plan Existing Conditions Report (2021). The District's Master Plan (2006) identifies needed improvements including shade trees, irrigation upgrades, shaded picnic area, and the conversion of the volleyball court to a group picnic area with shelter and tables. The District is currently in the process of updating the Master Plan, and the Master Plan Existing Conditions Report (2021) identified Westside Park as needing a new restroom facility. Therefore, the proposed project would not result in impacts related to land use and planning.

### **Mineral Resources**

The proposed project would be developed in an existing District-owned park. No mining operations or natural gas fields are located within the project area. Therefore, the proposed project would not result in impacts to mineral resources.

### **Noise**

Proposed project construction activities would result in temporary increases in ambient noise levels due to operation of construction equipment; however, increases in noise levels would be of short duration, would occur during normal business hours, and would not be significant. Project plans would include standard specifications to limit construction hours based on applicable local requirements, including the Noise Control Ordinance (Chapter 6.68 of the Sacramento County Code). Equipment would also be muffled and shrouded to minimize noise levels. The proposed project is not capacity increasing nor would it introduce a new, stationary noise source; therefore, the project would not result in permanent increases in noise levels. The proposed project would not result in impacts related to noise.

### **Population and Housing**

The proposed project does not include the construction or displacement of housing. Nor would the project result in the need for additional housing. Therefore, the proposed project would not result in population and housing impacts.

### **Public Services**

The proposed project would not increase the need for additional public services or expanded public service facilities. Therefore, the proposed project would not result in impacts related to public services.

### **Recreation**

The project includes improvements to Westside Park. The project would result in the conversion of the existing sand volleyball courts to a family gathering area which would include a shade structure, picnic tables, and BBQ grills, as well as the removal of the single stall restroom building, construction of a multi-stall restroom and storage building, and the

addition of walkway connections and bike racks. This would improve the park's facilities by increasing the functions of the park and the accessibility of paths and park facilities. The improvements would also introduce bicycle facilities within the park. Therefore, the proposed project would not result in recreation impacts.

### **Transportation**

The proposed project would not conflict with transportation planning documents, result in increased vehicle miles traveled, result in increased hazards due to design, nor result in inadequate emergency response access. The project limits are within the existing District-owned park, and in the case of any impacts to circulation related to movement of construction equipment, the District or its contractor would coordinate with emergency service personnel in advance of construction to ensure that any temporary lane closure does not affect response times. Project plans would include provisions and specifications regarding any lane closures or detours on County-maintained streets or highways in compliance with County Department of Transportation Right of Way Management requirements and Section 12-2 of the County's current Standard Construction Specifications. These plans would also comply with the current California Manual on Uniform Traffic Control Devices (Cal MUTCD). Express written consent for any such closures or detours is required by the County Department of Transportation Right of Way Management. Therefore, the proposed project would not result in impacts related to transportation.

### **Tribal Cultural Resources**

The project would be located within the existing park and would not impact tribal cultural resources. In the event of the discovery of human remains determined to be Native American, work would stop and the County coroner would be notified, consistent with standard specifications included in the project plans. The coroner would contact the Native American Heritage Commission within 24 hours, and treatment and disposition of human remains would be completed according to Native American Heritage Commission guidelines. Therefore, the proposed project would not result in tribal cultural resources impacts.

### **Utilities / Service Systems**

Any utility relocations or upgrades required for the project would be of short duration during construction and would be coordinated with the utility providers in advance of construction work. Project plans would provide standard specifications and requirements for construction refuse waste management in accordance with the Sacramento County Department of Waste Management and Recycling requirements. Therefore, the proposed project would not result in impacts related to utilities and service systems.

### **Wildfire**

The proposed project area is not located in a Very High Fire Hazard Severity Zone and would not place people or structures in areas that are subject to an increased risk of wildfire. Therefore, the proposed project would not result in impacts related to wildfire.

- (d) Scenic Highways. A categorical exception shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

As discussed under Item C “Aesthetics” above, the proposed project would not result in damage to a scenic resource within a highway officially designated as a State scenic highway. There are no scenic highways located in the project vicinity.

- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The project site is not listed on the Department of Toxic Substances Control Hazardous Waste and Substances Site List (Cortese List, compiled pursuant to Section 65962.5 of the Government Code). Project plans would include standard specifications defining emergency procedures for responding to hazardous materials releases for materials that would be brought onto the site as part of project implementation activities, or for any materials present at the site. The emergency procedures for hazardous materials releases would include the necessary protective equipment, spill containment procedures, and training of workers to respond to accidental spills/releases. All use, storage, transport and disposal of hazardous materials (including any hazardous wastes) during construction activities would be performed in accordance with existing local, State, and federal hazardous materials regulations.

- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The proposed project would occur within an existing District-owned park, and would not affect any historical resources.

## CONCLUSION

In summary, the proposed project would be exempt from detailed CEQA review pursuant to Sections 15301, 15303, and 15304 of the *CEQA Guidelines* and would not meet any of the exceptions listed in Section 15300.2 of the *CEQA Guidelines* that would make the Categorical Exemption inapplicable.

Attachment: Site Concept Plan

DECEMBER 15, 2021

CONCEPT PLAN

# WESTSIDE PARK IMPROVEMENTS

RIO LINDA ELVERTA RECREATION & PARK DISTRICT

