Todd Smith, Planning Director
Planning and Environmental Review

Troy Givans, Director
Department of Community Development

County of Sacramento

Mitigated Negative Declaration

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

1. **Control Number:** PLNP2021-00170

2. **Title and Short Description of Project:** Phan Apartment Homes at Sierra Vista Park

   The project consists of the following planning entitlement requests:

   1. A **Development Plan Review** for a 26-unit apartment home community in the SMUD Substation Neighborhood Preservation Area.
   2. A **Special Development Permit** to allow a reduction in perimeter landscaping from the 7-foot standard to 5 feet.
   3. A **Design Review** to comply with the Countywide Design Guidelines.

   If approved, the project would construct three two-story, multi-family buildings totaling 10,394 square feet and 26 units. The project would also construct approximately 21,389 square feet of asphalt paved access drives and a paved parking lot providing 54 stalls, 24 of which would be covered. Other site improvements include bike racks, trash enclosures, a playground, an outdoor common area, lighting, landscaping, sidewalks, trash enclosures, and new curb and gutter. The property will be enclosed by six-foot tall fencing and masonry walls located along the perimeter of the development. Access to the development is located at the south end of the site along 48th Avenue, and includes electronic entry/exit gates for vehicle and pedestrian traffic.

3. **Assessor's Parcel Number:** 039-0041-004-0000

4. **Location of Project:** The project site is located at 3945 48th Avenue, in the SMUD Substation Neighborhood Preservation Area Ordinance of the South Sacramento community of unincorporated Sacramento County.

5. **Project Applicant:**

   Bobby Phan
   5501 66th Avenue, Suite 100
   Sacramento, CA 95823

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

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

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

[Original Signature on File]
Joelle Inman
Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2021-00170

NAME: Phan Apartment Homes at Sierra Vista Park

LOCATION: The project site is located at 3945 48th Avenue, in the SMUD Substation Neighborhood Preservation Area Ordinance of the South Sacramento community of unincorporated Sacramento County (reference Plate IS-1).

ASSESSOR'S PARCEL NUMBER: 039-0041-004-0000

OWNER:

Seiss Wagner
300 36th Way
Sacramento, CA 95816

APPLICANT:

Bobby Phan
5501 66th Avenue, Suite 100
Sacramento, CA 95823

PROJECT DESCRIPTION

The project consists of the following planning entitlement requests:

1. A **Development Plan Review** for a 26-unit apartment home community in the SMUD Substation Neighborhood Preservation Area.

2. A **Special Development Permit** to allow a reduction in perimeter landscaping from the 7-foot standard to 5 feet.

3. A **Design Review** to comply with the Countywide Design Guidelines.

If approved, the project would construct three two-story, multi-family buildings totaling 10,394 square feet and 26 units (reference Plate IS-2). The project would also construct approximately 21,389 square feet of asphalt paved access drives and a paved parking lot providing 54 stalls, 24 of which would be covered. Other site improvements include bike racks, trash enclosures, a playground, an outdoor common area, lighting,

landscaping, sidewalks, trash enclosures, and new curb and gutter. The property will be enclosed by six-foot tall fencing and masonry walls located along the perimeter of the development. Access to the development is located at the south end of the site along 48th Avenue, and includes electronic entry/exit gates for vehicle and pedestrian traffic.

ENVIRONMENTAL SETTING

The 1.67-acre parcel is located in an urbanized area along the southwest side of State Highway 99 at the 47th Avenue exit. The site consists of an undeveloped lot, bordered on the east by a vacant lot, multi-family residential housing to the west, single-family and multi-family residential development to the south. The northern boundary is bordered by a drainage channel, which flows to the southeast and is a tributary to Morrison Creek. The site is nearly flat but slopes towards the drainage channel at the northern end of the property.

Vegetation onsite includes a eucalyptus grove at the southern end of the site and various non-native trees, common weedy species of grasses are located throughout the site, including soft chess (*Bromus hordeaceus*), ripgut brome (*B. diandrus*), wild oats (*Avena fatua*), and Italian ryegrass (*Festuca perennis*). Common herbaceous forbs include the redstem filaree (*Erodium cicutarium*), Mediterranean hoary mustard (*Hirschfeldia incana*), and wild radish (*Raphanus sativus*).

Plate IS-1: Vicinity Map

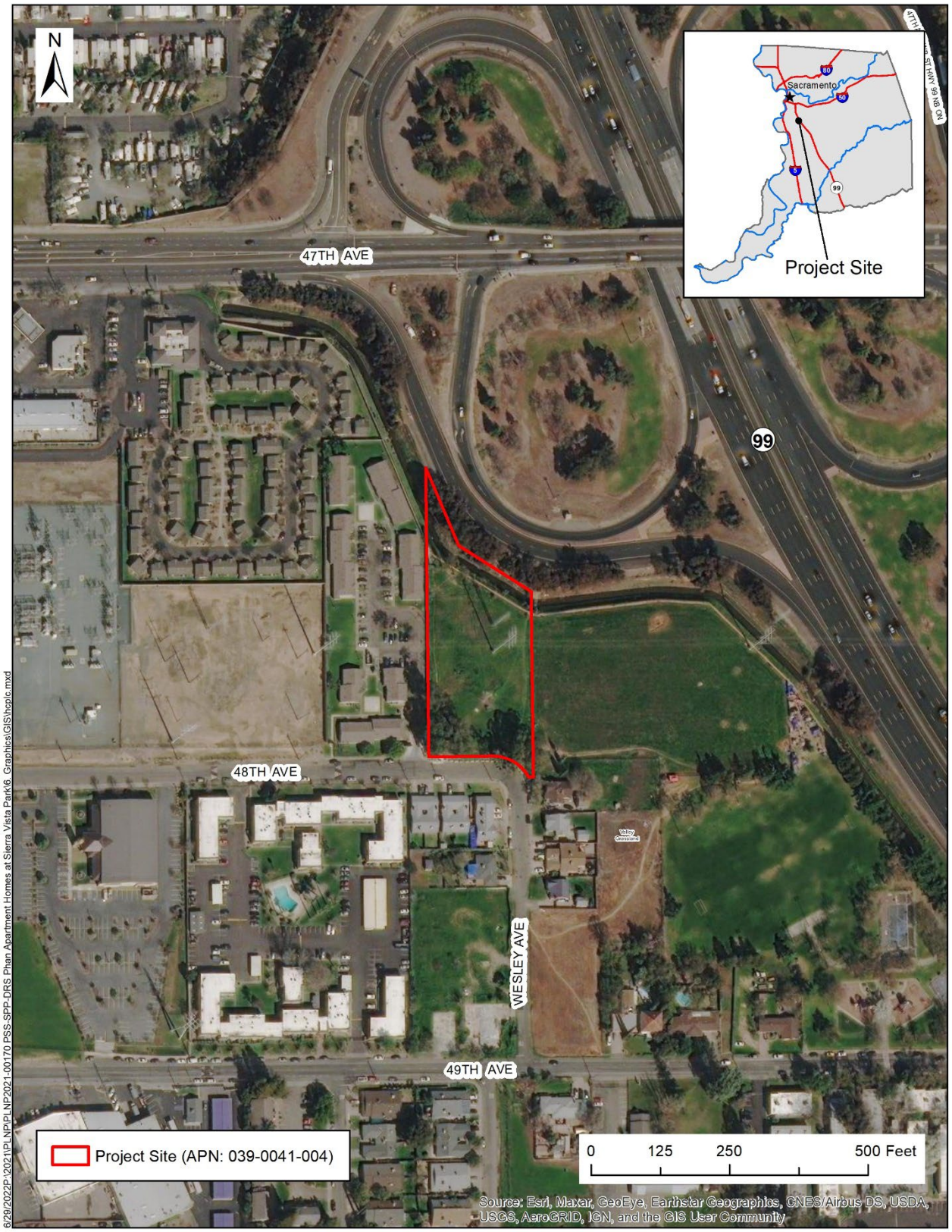
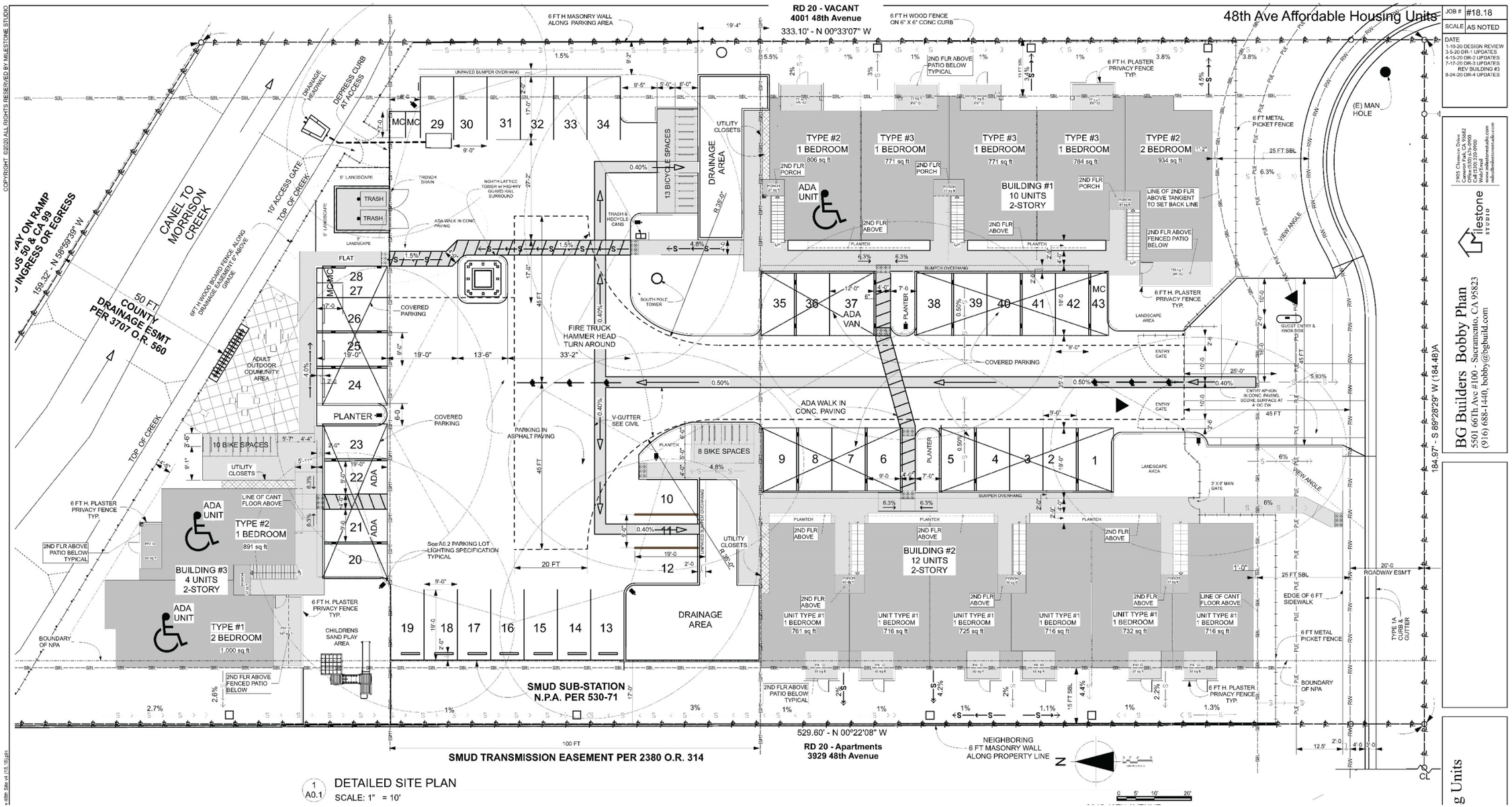


Plate IS-2: Proposed Site Plan



ENVIRONMENTAL EFFECTS

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

LAND USE

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

- 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

SACRAMENTO COUNTY GENERAL PLAN

The project site has a Sacramento County General Plan (General Plan) land use designation of Medium Density Residential (MDR). The proposed project is consistent with the existing General Plan designations and does not conflict with policies of the General Plan adopted to mitigate environmental impacts. Impacts in regards to conflicts with the General Plan are ***less than significant***.

SOUTH SACRAMENTO COMMUNITY PLAN

The project site is located within the South Sacramento community. The County Board of Supervisors adopted the South Sacramento Community Plan (Community Plan) in December 1978. The Community Plan identifies goals and objectives related to land use, population, housing, transportation, noise, utilities and community facilities in order to guide development within the Community Plan area. The Community Plan land use designation for the subject parcels is RD-20 (Multiple Family Residential). Multifamily dwellings are a permitted primary use within the RD-20 zone. The proposed project complies with the policies of the Community Plan. Impacts in regards to consistency with the South Sacramento Community Plan are ***less than significant***.

SACRAMENTO MUNICIPAL UTILITY DISTRICT SUBSTATION IN SOUTH SACRAMENTO NEIGHBORHOOD PRESERVATION AREA

The western property boundary is located approximately 535 feet east of the Sacramento Municipal Utility District (SMUD) substation. A portion of the project site is located within the SMUD Substation in South Sacramento Neighborhood Preservation Area (NPA). The purpose of the NPA is to guide development adjacent to the existing electrical substation and the easements associated with the high voltage transmission lines (reference Plate IS-3). The NPA provides development standards to protect the substation and its

associated electrical facilities as well as adjacent residential users. The SMUD NPA contains setback standards for uses abutting the substation as well as landscaping standards including the type of vegetation, location of planting, and vegetation height.

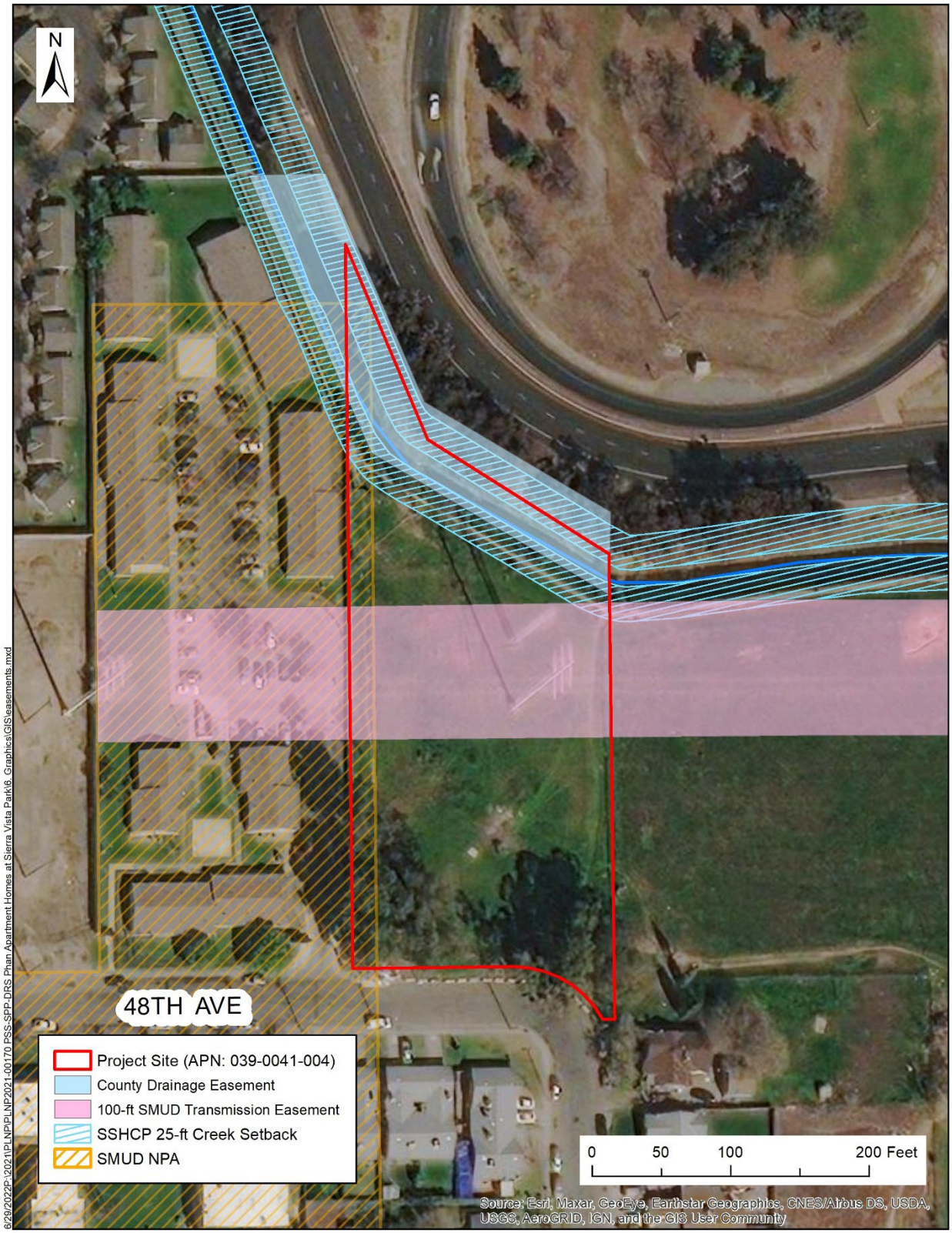
The area along the western boundary line is located within the SMUD NPA. The associated easement is 17-feet wide and runs from the southern property line to the drainage channel at the north. The subject parcel also has a 100-foot wide SMUD high voltage transmission easement, which bisects the parcel. Development in this area is limited and the project is proposing automotive and bicycle parking within the 100-foot easement; parking is an allowed use within the transmission easement.

The proposed project is consistent with the SMUD NPA Ordinance. Impacts in regards to consistency with the SMUD NPA are ***less than significant***.

Sacramento County Zoning Code

The proposed project is located on a parcel with a zoning designation of RD-20 (Multiple Family Residential). The proposed multifamily dwelling units are consistent with this zoning. The Special Development Permit entitlement request is to allow a reduction in perimeter landscaping from the 7-foot standard to 5-feet. Although the proposed 5-foot landscaping is inconsistent with the Zoning Code, the project site is constrained by the 100-foot SMUD easement and the Morrison Creek channel on a small parcel thereby reducing the available space to build out the project site to its zoned potential for multi-family housing. Therefore, the reduction of 2 feet of landscaping does not substantially conflict with the Zoning Code such that there is an environmental impact. Environmental impacts in regards to conflicts with Zoning Code are ***less than significant***.

Plate IS-3: Existing Easements and SMUD NPA



AIR QUALITY

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

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

- Expose sensitive receptors to pollutant concentrations in excess of standards

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-1). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-2).

Table IS-1: 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

1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.
2. Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009.
3. For the 1997, 2008 and the 2015 Standard.
4. Cannot be classified
5. Designation was made as part of EPA's designations for the 2010 SO_2 Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017

* 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

Table IS-2: SMAQMD Significance Thresholds

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

1. Reactive Organic Gas
2. California Ambient Air Quality Standards
3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.

CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS

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

CONSTRUCTION PARTICULATE MATTER EMISSIONS

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

The project site is less than 35 acres (1.67 acres) and does not involve buildings more than 4 stories tall; demolition activities; 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. Therefore, the project falls below the SMAQMD Guide screening criteria for PM_{10} 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 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:

- 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);

- Require import or export of soil materials that will require a considerable amount of haul truck activity; or,
- 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.

CONSTRUCTION EMISSIONS CONCLUSION

The screening criteria for construction emissions related to both particulate matter and ozone precursors are almost identical, as shown above. As noted, the Phan Apartments project site is less than 35 acres (1.67 acres) and does not involve buildings more than 4 stories tall; demolition activities, 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 682 new dwelling units for residential, low rise apartment projects. For particulate matter emissions, the screening table allows users to screen out projects that include up to 1,385 new single-family dwelling units for residential projects. The proposed project consists of 26 dwelling units, and therefore falls below these screening thresholds. 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 I*nstructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools* (SMAQMD's Instructions). To date, SMAQMD has published three options for analyzing projects: small projects may use the Minor Project Health Screening Tool, while larger projects may use the Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

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

As noted in SMAQMD's Friant Guidance, "each model generates conservative estimates of health effects, for two reasons: The tools' outputs are based on the simulation of a full year of exposure at the maximum daily average of the increases in air pollution concentration… [and] [t]he health effects are calculated for emissions levels that are very high" (SMAQMD 2020).

The model derives the estimated health risk associated with operation of the project based on increases in concentrations of ozone and $PM_{2.5}$ that were estimated using a photochemical grid model (PGM). The concentration estimates of the PGM are then applied to the U.S. Environmental Protection Agency's Benefits Mapping and Analysis Program (BenMAP) to estimate the resulting health effects from concentration increases. PGMs and BenMAP were developed to assess air pollution and human health impacts over large areas and populations that far exceed the area of an average land use

development project. These models were never designed to determine whether emissions generated by an individual development project would affect community health or the date an air basin would attain an ambient air quality standard. Rather, they are used to help inform regional planning strategies based on cumulative changes in emissions within an air basin or larger geography.

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

DISCUSSION OF PROJECT IMPACTS: CRITERIA POLLUTANT HEALTH RISKS

The project site is located to the west of southbound State Route 99 (SR 99). 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-3 and Table IS-4.

Table IS-3: $PM_{2.5}$ 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]	Incidences 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	0.70	0.60	0.0033%	18419
Hospital Admissions, Asthma	0 - 64	0.0045	0.039	0.0021%	1846
Hospital Admissions, All Respiratory	65 - 99	0.22	0.18	0.0092%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular	65 - 99	0.11	0.097	0.00041%	24037

(less Myocardial Infarctions)					
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000055	0.000047	0.0012%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0050	0.0044	0.0014%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.012	0.011	0.0015%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.020	0.011	0.0015%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.070	0.062	0.0012%	5052
Mortality					
Mortality, All Cause	30 - 99	1.3	1.1	0.0025%	44766

Notes:

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

Table IS-4: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range[1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5] (Mean)	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2] (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.036	0.025	0.00013%	19644
Emergency Room Visits, Asthma	0 - 17	0.18	0.13	0.0022%	5859
Emergency Room Visits, Asthma	18 - 99	0.27	0.20	0.0016%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.021	0.015	0.00005%	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 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

NOISE FUNDAMENTALS & TERMINOLOGY

Noise is often described as unwanted sound, and thus is a subjective reaction to the physical phenomenon of sound. Sound is variations in air pressure that the ear can detect. Sound levels are measured and expressed in decibels (dB), which is the unit for describing the amplitude of sound1. Because sound pressure levels are defined as logarithmic numbers, the values cannot be directly added or subtracted. For example, two sound sources, each producing 50 dB, will produce 53 dB when combined, not 100 dB. This is because two sources have two times the energy (not volume) of one source, which results in a 3 dB increase in noise levels.

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

Most environmental sounds consist of several frequencies, with each frequency differing in sound level. The intensities of each frequency combine to generate sound. Acoustical professionals quantify sounds by "weighting" frequencies based on how sensitive humans are to that particular frequency. Using this method, low and extremely high frequency sounds are given less weight, or importance, while mid-range frequencies are given more weight, because humans can hear mid-range frequencies much better than low and very high frequencies. This method is called "A" weighting, and the units of measurement are called dBA (A-weighted decibel level). In practice, noise is usually measured with a meter that includes an electrical "filter" that converts the sound to dBA. The threshold at which one hears sounds is considered to be zero (0) dBA. The range of sound in normal human experience is 0 to 140 dBA. Decibels and other technical terms are defined in Table IS-5.

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

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

Table IS-5: Acoustical Terminology

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

REGULATORY SETTING

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

STATE OF CALIFORNIA

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

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

COUNTY GENERAL PLAN NOISE ELEMENT

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

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

> NO-1. The noise level standards for noise-sensitive areas of *new* uses affected by traffic or railroad noise sources in Sacramento County are shown by Table 1 (Table IS-6 of this report). Where the noise level standards of Table 1 are predicted to be exceeded at new uses proposed within Sacramento County which are affected by traffic or railroad noise, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 1 standards (reference Table IS-6).

Table IS-6: Noise Standards for New Uses Affected by Traffic and Railroad Noise

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

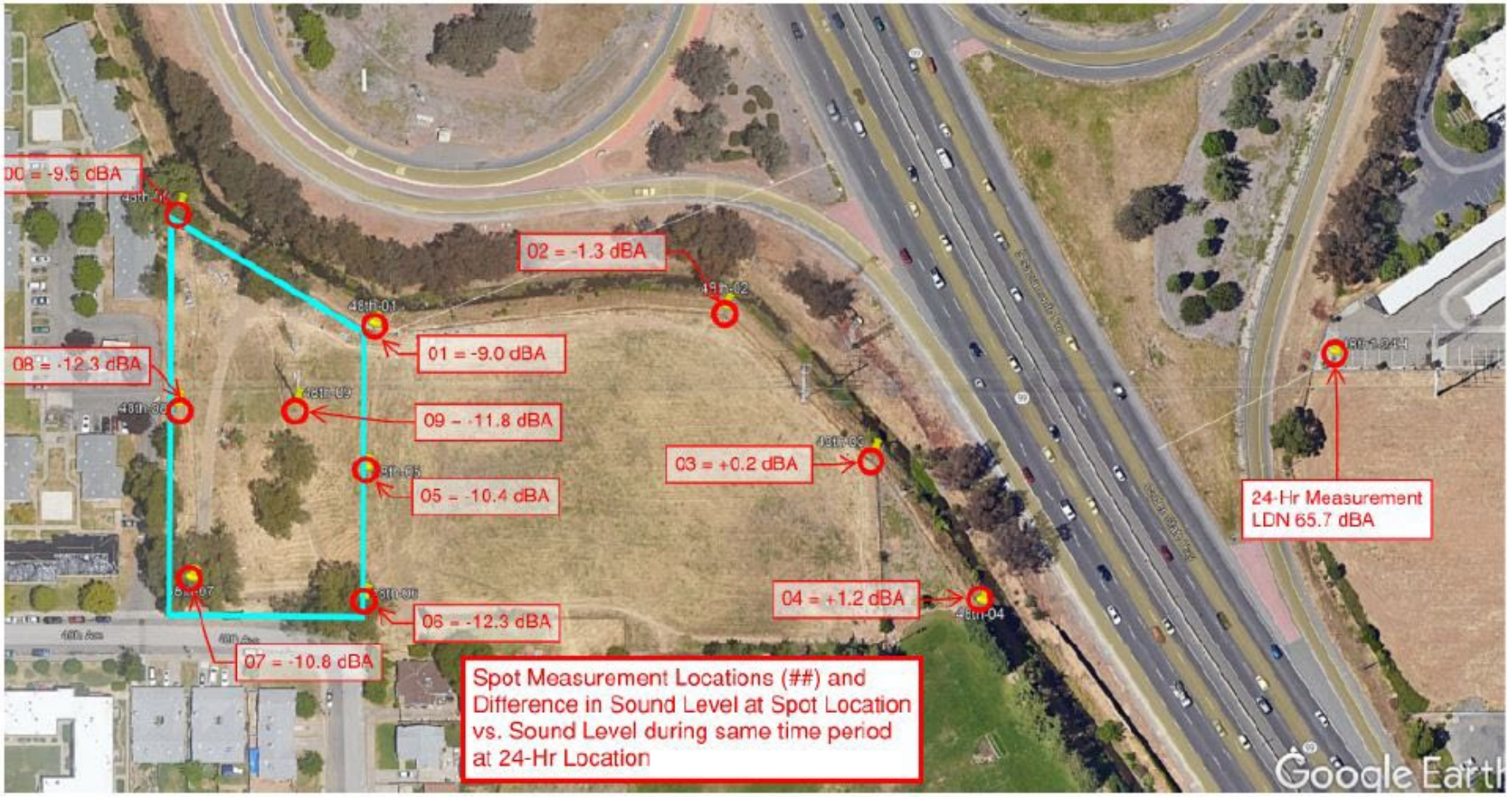
1. Sensitive areas are defined in acoustical terminology section.
2. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.
3. Where there are no sensitive exterior spaces proposed for these uses, only the interior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

METHODOLOGY

The project site is located adjacent to SR 99. RNS Acoustics (RNS) was retained by the applicant to prepare a noise assessment (Appendix A). The intent of the assessment was to determine noise levels at the project site from automotive traffic along SR 99 and provide noise reduction recommendations where necessary.

RNS conducted several noise measurements at the project site and around the adjacent eastern parcel, on September 24, 2021 from 2:55pm to 4:05pm (reference Plate IS-4). A 24-hour noise measurement was taken from the U-Haul parking lot located on the eastern side of northbound SR 99, from 2:00pm on September 24 to 2:00pm to September 25. The project site and U-Haul site are generally flat and have similar elevations. The consultant specified that the U-Haul location was used for staging of the monitoring equipment because of concerns of equipment being stolen at the project site. The spot level measurements were then compared to the same time-periods as the 24-hour location measurements.

Plate IS-4: Spot Measurement Locations and 24-hr Location



DISCUSSION OF PROJECT IMPACTS

The average noise level at the 24-hr location was 65.7 dB L_{dn}. RNS' data indicate that the noise levels measurements at the project site were 9.0 to 12.3 dBA lower than measurements at the 24-hour location. This can be attributed to the increased distance of the project site from the highway as compared to the 24-hour location. The loudest spot measurement location on the project site (#1) was located at the northeast corner of the project site. The northeast corner of the project site is located approximately 75 feet south of the southbound SR 99 on-ramp and 450 feet from the centerline of the closet southbound lane of SR 99. The noise study calculated the L_{dn} equivalent for the project site by subtracting 9.0 dB (difference between loudest spot measurement and 24-hour location) from the hourly measurements of the 24-hour location. The report concluded that the average noise level at the project site was 56.7 dB L_{dn}, which is below the residential, outdoor sensitive threshold of 65 dB. No additional noise mitigation is required for outdoor activity areas for this development.

Standard residential construction (stucco siding, windows with a Sound Transmission Class (STC) rating of STC-27, door weather-stripping, exterior wall insulation, composition plywood roof), results in an exterior to interior noise reduction of at least 25 dB with windows closed and approximately 15 dB with windows open. Therefore, standard construction practices would ensure that the project is compliant with the County 45 dBA L_{dn} interior noise level standard. No additional noise mitigation is required to meet the interior noise level standard.

Impacts related to noise are ***less than significant***.

HYDROLOGY AND WATER QUALITY

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

- Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site
- Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area
- Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)
- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality

HYDROLOGY & DRAINAGE

The project is located within the Morrison Creek watershed. Flows drain towards the northern end of the property and into the drainage channel, which then flows to the

southeast for one mile where it then converges with Morrison Creek. Morrison Creek continues southwesterly to the Regional County Sanitation District's Wastewater Treatment Plant.

The property is located within a FEMA designated "area with reduced flood risk due to levee" Zone X.

The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding. Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are ***less than significant***.

Urban Level Of Protection

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

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

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

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

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

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

In most cases, the ULOP is defined as protection against a 200-year flood, although there are exceptions for shallow flooding or flooding from small watersheds. Levee systems in the Sacramento region require major improvements to provide 200-year flood protection. Therefore, the County and other land use agencies will need to make a finding of adequate progress towards a ULOP to authorize new development in the areas being

protected. The ULOP annual reports and the original 2016 ULOP Plan are important pieces of evidence that the land use agencies need and should review in order to make this finding for its respective jurisdictions.

DISCUSSION OF PROJECT IMPACTS

The project is located in two ULOP areas, the American River and Morrison Creek areas. Surface flows drain to the north and into a drainage channel, which flows to the southeast and eventually into Morrison Creek. The levee-protected ULOP area is the American River and the non-levee protected area is Morrison Creek. The Sacramento Area Flood Control Agency's (SAFCA) "Urban Level of Flood Protection Annual Report" (July 2021) concluded that SAFCA has completed a number of improvements on the American River Levee Improvements Project and is on-track to have the project completed by 2025, which will satisfy the 200-year flood protection requirement for the American River (Finding #3).

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

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

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

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

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

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

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

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

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

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

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

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

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

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

OPERATION: STORMWATER RUNOFF

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

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

The County requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design

Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

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

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

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

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

BIOLOGICAL RESOURCES

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

- Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat
- Have a substantial adverse effect on riparian habitat or other sensitive natural communities
- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community
- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species
- Conflict with any local policies or ordinances protecting biological resources

SURVEYS AND METHODOLOGY

Salix Consulting, Inc. (Salix) prepared a biological resources report (Appendix B) on behalf of the applicant. Studies included a floristic and wildlife surveys and an aquatic resources inventory. Salix reviewed and analyzed a variety of data from state and federal agencies.

California Tree and Landscape Consulting, Inc. (CalTLC) prepared the tree inventory and arborist report on behalf of the applicant (Appendix C).

A list of special-status species known or with potential to occur on the project site or in the immediate vicinity was developed from database queries of USFWS' Information for Planning and Consultation (IPaC), CDFW's California Natural Diversity Database (CNDDB), and the California Native Plant Society (CNPS) Rare Plant Inventory. Significance findings have been based on the impact conclusions of applicable surveys and studies. In absence of such published documents, the analyses rely on the general definitions of significance.

SOUTH SACRAMENTO COUNTY HABITAT CONSERVATION PLAN (SSHCP)

The SSHCP is a regional approach to addressing development, habitat conservation, and agricultural lands within the south Sacramento County region, including the cities of Galt and Rancho Cordova. The specific geographic scope of the SSHCP includes U.S. Highway 50 to the north, the Sacramento River levee and County Road J11 (connects the towns of Walnut Grove and Thornton, it is known as the Walnut Grove-Thornton Road) to the west, the Sacramento County line with El Dorado and Amador counties to the east, and San Joaquin County to the south. The SSHCP Project area excludes the City of Sacramento, the City of Folsom, the City of Elk Grove, most of the Sacramento-San Joaquin Delta, and the Sacramento community of Rancho Murieta.

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

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

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

CONSISTENCY WITH THE SOUTH SACRAMENTO COUNTY HABITAT CONSERVATION PLAN

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

The baseline mapping for the SSHCP land covers is illustrated in Plate IS-5. The baseline mapping indicates the parcel comprises the following land cover types and acreages: 1.50 acres High Density Development, 0.10 acres Valley Grassland, and 0.04 acres of Streams/Creeks. The land cover types outlined in the baseline map are an interpretation of habitat based on remote sensing analysis over a number years prior to adoption of the SSHCP. Therefore, these land covers are intended to serve as a guide as to what may

be present on the project site and are intended to be updated. During the local impact authorization process, these land covers will be refined, and calculation of project mitigation impact fees will be based on project specific survey and wetland delineation data.

Salix's report concluded that the land cover types in the project area consisted of approximately 1.31 acres of Valley Grassland and 0.04 acres of Major Roads (Plate IS-6). The Biological Resources Assessment concluded that the project study area does not contain any areas or features that may qualify as aquatic resources; however, the study area did not include the drainage channel north of the proposed development area. The 0.04 acres of Stream/Creeks was left out of the report's study area as development would not occur within the channel.

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

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

The applicant submitted a Small Lot Waiver for Stream Setbacks in order to deviate from the 25-foot stream setback requirement.

PER determined that the project site met the following conditions for waiver requests outlined in the SSHCP:

- The project site is a preexisting lot (defined as existing as of the date the SSHCP is formally adopted) for which there is insufficient room outside the Stream Setback for uses permitted by the underlying zoning and for which there is no other reasonable or prudent alternative to placement in the setback, including obtaining variances from setback or other requirements that would allow conformance with the setback requirements.

- The 25-foot stream setback requirement is considered an economic hardship whereby the subject property is not capable of yielding a reasonable economic return as a result of unique circumstances specific to the subject property, as follows:

    - An economic hardship related to or arising from the characteristics of the property due to the particular physical surroundings, shape, or topographical conditions of the property involved; and

- The applicant can demonstrate that there is no adjacent land that is reasonably available or could be obtained, used, expanded, or managed to fulfill the basic purpose of the proposed activity.

As indicated in the Waiver application, the project site has limited development flexibility (reference Plate IS-3), as it is impacted by the following constraints:

- A 100-foot Sacramento Municipal Utility District (SMUD) high voltage transmission easement;
- A 200-foot SMUD Neighborhood Preservation Area (NPA) electrical substation easement; and,
- A 50-foot Sacramento County drainage easement along the drainage canal.

The above easements reduce the net area of the project site to approximately 0.9 acres. The addition of the 25-foot stream setback requirement would further reduce the net developable area of the project site to approximately 0.78 acres. This would create an economic hardship for the proposed project whereby a reasonable economic return could not be yielded because of the unique site constraints associated with the subject property. The only adjacent land that is reasonably available is the vacant property to the east of the site. The project applicant approached the owner of the vacant property with an offer to purchase that was declined.

PER further determined that that the proposed Covered Activity is in conformance with all applicable local, state, and federal regulations, and that the waiver granted is the minimum relief necessary to relieve the hardship.

PER provided this determination to State and Federal Permitting Agencies for review and no objections to granting the waiver were received. The request was approved on December 22, 2021.

Impacts with regards to consistency with the proposed SSHCP are ***less than significant***.

Plate IS-5: SSHCP Land Cover Types for the Project Site

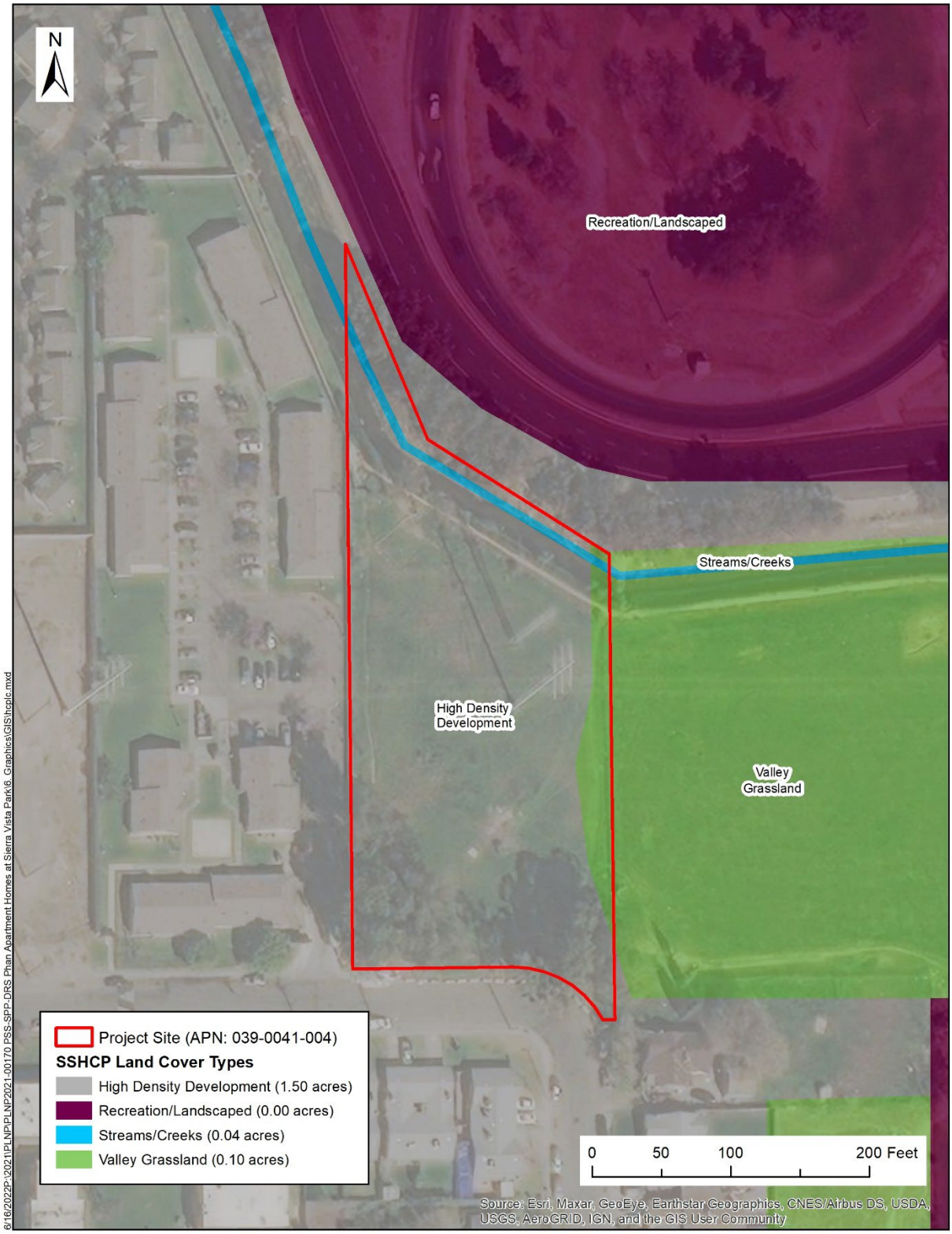


Plate IS-6: Verified Land Cover Types

WETLANDS AND WATERS OF THE U.S.

Federal and state regulation (Clean Water Act Sections 404 and 401) uses the term "surface water" to refer to all standing or flowing water which is present aboveground either perennially or seasonally. There are many types of surface waters, but the two major groupings are linear waterways with a bed and bank (streams, rivers, etc) and wetlands. The Clean Water Act has defined the term wetland to mean "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions". The term "wetlands" includes a diverse assortment of habitats such as perennial and seasonal freshwater marshes, vernal pools, and wetted swales. The 1987 Army Corps Wetlands Delineation Manual is used to determine whether an area meets the technical criteria for a wetland and is therefore subject to local, State or Federal regulation of that habitat type. A delineation verification by the Army Corps will verify the size and condition of the wetlands and other waters in question, and will help determine the extent of government jurisdiction.

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

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

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

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

incidental take of species, both permitting processes are done in conjunction with one another and consist of:

- A programmatic general permit (PGP) founded on a local aquatic resources protection program and designed to reduce duplication with that program, for covered activities with minimal individual and cumulative effects on aquatic resources. The PGP is implemented by the three land-use authority Permit Applicants (i.e., Sacramento County, Galt, and Rancho Cordova).
- A regional general permit (RGP), for covered activities with minimal individual and cumulative effects on aquatic resources that do not qualify for the PGP.
- A procedure for issuing Letters of Permission (LOP procedure) for covered activities with more than minimal effects, but less-than-significant effects, on the human environment, including aquatic resources.
- An abbreviated process for issuing standard permits (abbreviated SP) for other covered activity impacts that do not qualify for the PGP or the LOP procedure. The abbreviated SP process is used for the small number of SSHCP covered activities requiring authorization under CWA 404 that may significantly affect the human environment under NEPA, requiring the preparation of an EIS.

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

DISCUSSION OF PROJECT IMPACTS

The baseline mapping classifies the unnamed drainage channel classified as 0.04 acres of Stream/Creeks. The proposed 24-inch storm drain outfall would be located within the embankment of the channel. Construction level specifications have not been submitted for the structure, but a 2-foot by 2-foot structure would constitute a direct impact to 0.00009 acres of Stream/Creek land cover. The applicant will be required to secure all necessary regulatory permits and agreements for the proposed drainage outfall. .

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

NON-NATIVE TREES

The Sacramento County General Plan Conservation and Environmental Justice Elements contain 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 onsite 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.

EJ-23. The County will achieve equitable tree canopy in EJ Communities.

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. Policy EJ-23 was adopted because there is a disproportionate lack of tree canopy cover in identified EJ communities. This policy is guided by an implementation measure which identifies that during California Environmental Quality Act review, project (public and private) tree impacts shall be mitigated by providing an extra 25 percent tree replacement in the same EJ community where the impact occurs (i.e. 125 percent).

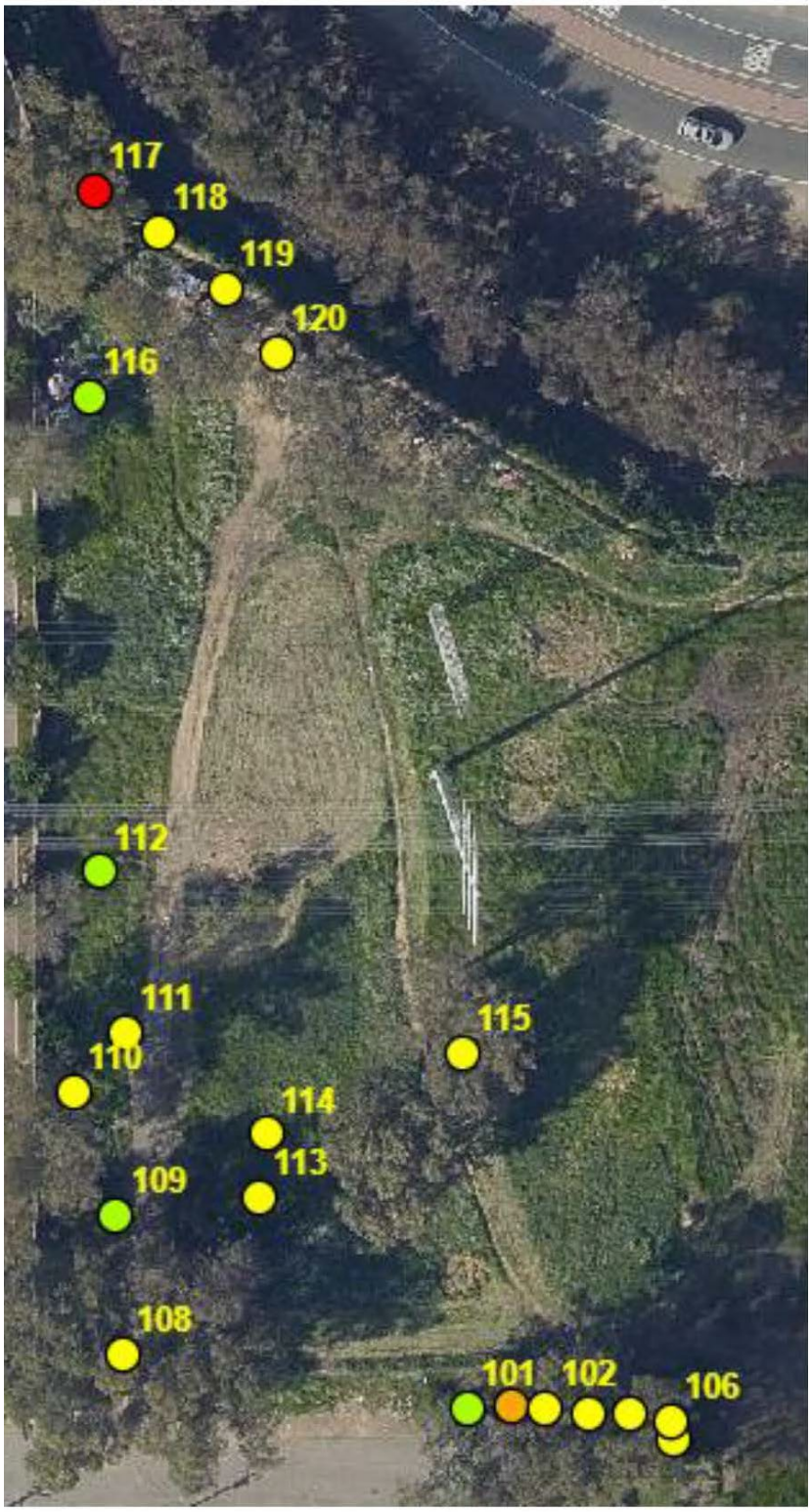
DISCUSSION OF PROJECT IMPACTS

California Tree and Landscape Consulting, Inc. (CalTLC) prepared an arborist report (Appendix C). The arborist report identified 20 trees on the project site. None of the documented trees are either native, protected species, nor are any of the trees considered landmark trees under the County Tree Preservation Ordinance. All but one of trees surveyed on the site are blue gum (*Eucalyptus globulus*). The majority of these trees are located closely together and form a eucalyptus grove towards the southwestern portion of the parcel (refer to Plate IS-7). The arborist report recommends the removal of 16 trees, 15 blue gums and one dead Canary Island pine (*Pinus canariensis*) labeled as #117. Trees 108, 118, 119 and 120 are to be preserved. The eucalyptus grove comprises 0.27 acres (11,761.20 square feet). The project site is located within the South Sacramento community, which is one of four designated Environmental Justice communities within the General Plan. Pursuant to the Implementation Measure for Policy EJ-23, an extra 25 percent tree replacement would be required. This would bring the total tree canopy area to 14,701.50 square feet. The 15-year shade value for the trees listed on the proposed landscape plan would provide 17,376 square feet of canopy, which would result in a net-gain—no mitigation is required.

CONCLUSION

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

Plate IS-7: Tree Locations



Special Status Species

The likelihood of a special status species to be present on the project site was determined using the technical studies/documents listed above, and topical literature as cited. Species considered for presence are those species with modeled habitat identified in the SSHCP and species considered with potential occurrence as indicated on the official USFWS species list, CNDDB quadrangle queries (Sacramento East, Sacramento West, Clarksburg Carmichael, Florin, and Elk Grove U.S. Geological Survey 7.5-minute quadrangles), and CNPS queries. This is the basis for species outlined in Table IS-7 and Table IS-8, which report the likelihood of species occurrence based on habitat presence either on the site or in proximity of the site, survey results (if any), and nearby recorded species occurrences. Likelihood of occurrence is rated as Not Expected to Occur, Could Occur, and Known to Occur, which are defined as:

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

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

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

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

Special Status Plants

Table IS-7 provides a list of the special status plant species with potential to occur based upon the available data from USFWS' IPaC, CNDDB, CNPS, and species covered by the SSHCP. The table describes their regulatory status, habitat, and potential for occurrence on the project site. Rationale for potential for occurrence was based upon modeled species within the SSHCP valley grassland and streams/creeks cover types as well as CNDDB records.

Table IS-7: Special Status Plant Species and Potential for Occurrence

Species	Status [1]				Habitat and Blooming Period	Potential for Occurrence[2]
	USFWS	CDFW	CRPR	SSHCP		
Ahart's dwarf rush *Juncus leiospermus* var. *ahartii*	_	_	1B.2	Yes	An annual herb found in mesic valley and foothill grassland from 100 to 750 feet. Blooms March - May (CNPS 2020).	Not expected to occur. Project site lacks aquatic features that would keep the site moist. There is one recorded occurrence within the CNDDB search area; however, it is located more than five miles east of the site.

Species	Status [1]				Habitat and Blooming Period	Potential for Occurrence[2]
	USFWS	CDFW	CRPR	SSHCP		
Bogg's Lake hedge-hyssop *Gratiola heterosepala*	–	E	1B.2	Yes	A state-endangered annual herb found in clay soils along margins of lakes, marshes, swamps, and in vernal pools from 33 to 7,792 feet elevation. Blooms from April - June (CNPS 2020).	Not expected to occur. Proposed development area lacks aquatic habitat. There are five occurrences within the six-quad CNDDB search area; however, all of them are located farther than five miles from the site.
Dwarf downingia *Downingia pusilla*	–	–	2B.2	Yes	An annual herb found in mesic valley and foothill grassland and vernal pools from 3 to 1,500 feet elevation. Blooms March - May (CNPS 2020).	Not expected to occur. There are three known CNDDB occurrences within the search area; the nearest occurrence is located more than seven miles to the east of the site.
Heckard's pepper grass *Lepidium latipes var. heckardii*	–	–	1B.2	No	Valley and foothill grasslands (alkaline flats) from 0-655 feet elevation. Blooms March – May (CNPS 2020).	Not expected to occur. Site does not contain vernal pools. No known occurrences within five miles of the project site.
Legenere *Legenere limosa*	–	–	1B.1	Yes	Relatively deep and wet vernal pools below 3,000 feet elevation. Blooms April – June (CNPS 2020).	Not expected to occur. The site does not contain vernal pools. There are 17 occurrences within the CNDDB search area, with the nearest occurrence approximately 4.68 miles south of the site.
Peruvian dodder *Cuscuta obtusiflora var. glandulosa*	–	–	2B.2	No	Marshes and swamps (fresh water) from 0-920 feet elevation. Blooms July-October (CNPS 2020).	Not expected to occur. No known occurrences within five miles of the project site.
Pincushion navarretia *Navarretia myersii*	–	–	1B.1	Yes	Vernal pools (often acidic). 65 – to 980 feet elevation. Blooms April – May.	Not expected to occur. The site does not contain vernal pools. No occurrences within five miles of the site.
Sacramento Orcutt grass *Orcuttia viscida*	E	E	1B.1	Yes	Vernal pools; 98 to 328 feet elevation. Blooms April–July (CNPS 2020).	Not expected to occur. Not expected to occur. The site does not contain vernal pools. No occurrences within five miles of the site. The project site is not in or near designated critical habitat for Sacramento Orcutt grass.
Saline clover *Trifolium hydrophilum*	–	–	1B.2	No	Shallow marsh, vernal pools, alkaline flats; 0-985 feet. Blooms April – June (CNPS 2019)	Not expected to occur. No habitat present on-site. There are no known occurrences within five miles of the project site.

Species	Status [1]				Habitat and Blooming Period	Potential for Occurrence[2]
	USFWS	CDFW	CRPR	SSHCP		
Sanford's arrowhead *Sagittaria sanfordii*	–	–	1B.2	Yes	Shallow freshwater marshes, swamps, drainage channels; below 2,200 feet elevation. Blooms May–October (CNPS 2020).	Could occur. The unnamed drainage channel at the northern end of the property could provide suitable habitat for the site; however, this area is fenced off from the proposed development site. There are 18 occurrences within five miles of the site, with the nearest occurrence approximately 0.86 miles southeast of the site. Further discussion below.
Slender Orcutt grass *Orcuttia tenuis*	T	E	1B.1	Yes	Annual herb found in vernal pools, often those with gravelly substrate, from 115 to 5,800 ft. Blooms May – October (CNPS 2020).	Not expected to occur. No habitat on-site. No occurrences within five miles of the site.

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

[1] Legal Status Definitions

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

SANFORD'S ARROWHEAD

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

DISCUSSION OF PROJECT IMPACTS

The unnamed drainage channel at the northern end of the property could provide suitable habitat for the site; however, this area is fenced off from the proposed development site. There are 18 occurrences within five miles of the site, with the nearest occurrence approximately 0.86 miles southeast of the site. Construction within the embankment area of the channel would be limited to the 24-inch outfall at the northeast corner of the project.

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

SPECIAL STATUS WILDLIFE SPECIES

Table IS-8 provides a list of the special status wildlife species with potential to occur based upon the available data from USFWS' IPaC, CNDDB, and species covered by the SSHCP. The table describes their regulatory status, habitat, and potential for occurrence on the project site.

Table IS-8: Special Status Wildlife and Potential for Occurrence

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
Invertebrates					
California linderiella *Linderiella occidentalis*	–	–	No	Inhabit shallow vernal pools and other seasonal wetlands.	Not expected to occur. The site does not contain vernal pools or seasonal wetlands.
Midvalley fairy shrimp *Branchinecta mesovallensis*	–	–	Yes	Inhabit shallow vernal pools, vernal swales, and various artificial ephemeral wetland habitats in the Sacramento (SSHCP 2018).	Not expected to occur. The site does not contain vernal pools or seasonal wetlands.
Ricksecker's water scavenger beetle *Hydrochara ricksecker*i	–	–	Yes	Inhabits seasonal wetlands, including vernal pools.	Not expected to occur. The site does not contain vernal pools or seasonal wetlands.
Valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	T	–	Yes	VELB is completely dependent on its host plant, elderberry (*Sambucus* species), which is a common component of the remaining riparian forests and adjacent upland habitats of the Central Valley. In non-riparian settings, elderberries occur solitarily or in groups in oak woodlands and annual grasslands.	Not expected to occur. No elderberry shrubs onsite.
Vernal pool fairy shrimp *Branchinecta lynchi*	T	–	Yes	Vernal pools and other seasonal wetlands in valley and foothill grasslands. Tends to occur in smaller wetland features (less than 0.05 acre in size) (USFWS 1994).	Not expected to occur. The site does not contain vernal pools or seasonal wetlands.
Vernal pool tadpole shrimp *Lepidurus packardi*	E	–	Yes	Vernal pools and other seasonal wetlands in valley and foothill grasslands that pond for sufficient duration to allow the species to complete its life cycle. Typically found in ponds ranging from 0.1 to 80 acres in size (USFWS 1994).	Not expected to occur. The site does not contain vernal pools or seasonal wetlands.
Amphibians and Reptiles					
California tiger salamander *Ambystoma californiense*	FT	ST	Yes	Vernal pools and seasonal wetlands with a minimum 10-week inundation period and surrounding uplands, primarily grasslands, with burrows and other belowground refugia (e.g., rock or soil crevices).	Not expected to occur. There are no CNDDB occurrences within the search area. Additionally, the site is outside of the known range of the species.
Giant garter snake	T	T	Yes	Slow-moving streams, sloughs, ponds, marshes, inundated floodplains, rice fields, and	Could occur. The drainage channel at the north end of the parcel has a natural mud bottom and

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
Thamnophis gigas				irrigation/drainage ditches on the Central Valley floor with mud bottoms, earthen banks, emergent vegetation, abundant small aquatic prey and absence or low numbers of large predatory fish. Also require upland refugia not subject to flooding during the snake's inactive season.	aerial imagery shows ample vegetation within the channel as well as water in several summer months. There are 7 occurrences within the CNDDB search area, with the nearest occurrence located 3.59 miles southwest of the site at Regional San's Bufferlands. The development area is provides upland grasslands, but lacks rodent burrows needed for refugia in the inactive season. Further discussion below.
Western pond turtle *Emys marmorata*	–	SC	Yes	Forage in ponds, marshes, slow-moving streams, sloughs, and irrigation/drainage ditches; nest in nearby uplands with low, sparse vegetation.	Could occur. The drainage channel at the north end of the parcel has a natural mud bottom and aerial imagery shows ample vegetation within the channel as well as water in several summer months; however, there is a chain-link fence between the development area and the drainage channel, which would exclude the species from the area proposed for construction. There are 7 occurrences within the CNDDB search area with the nearest occurrence located 2.85 miles southwest of the site.
Western spadefoot *Spea hammondii*	–	SC	Yes	Vernal pools and other seasonal ponds with a minimum three-week inundation period in valley and adjacent foothill grasslands.	Not expected to occur. Project site does not contain seasonal vernal pools, wetlands, or ponds. There are four known CNDDB records within the search area, none of which are located within 5 miles of the site.
		Birds			
Burrowing owl *Athene cunicularia* (burrow sites)	–	SC	Yes	Nests and forages in grasslands, agricultural lands, open shrublands, and open woodlands with existing ground squirrel burrows or friable soils. Suitable burrow sites consist of short, herbaceous vegetation with only sparse cover of shrubs or taller herbs (Shuford and Gardali 2008: 221).	Could occur. Although the site contains valley grasslands, the bio report notes that the site lacks rodent burrows, and is located in a busy, urban area and is less than an acre in size; however, out of an abundance of caution the site should be surveyed again prior to construction. There are 28 CNDDB records within the search area. The nearest occurrence is approximately 0.52 miles west of the site. Further discussion below.
Cooper's hawk *Accipiter cooperi*	–	–	Yes	Nests in a wide variety of woodland and forest habitats. Dense stands of live oak, deciduous riparian or other forest habitats near water are preferred. Nests are placed in deciduous trees in crotches 10-80 ft above the ground (CWHR 2019).	Not expected to occur. The site does not contain dense stands of riparian woodlands. There are three occurrences within the CNDDB search area. The closest record, from 1996, is approximately 4.84 miles northwest of the site.
Ferruginous hawk *Buteo regalis*	–	–	Yes	Forages in large, open tracts of grasslands, sparse scrubland, and deserts. It frequents open grasslands, sagebrush flats, desert scrub, low foothills and surrounding valleys, and fringes of pinyon-juniper habitats. Nesting	Not expected to occur. The project site and neighboring parcel to the east provide suitable foraging habitat for the species, but since the species is not known to nest in CA, it is highly unlikely the project would result in take of the

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
				occurs in lone trees or on telephone poles; species is not known to breed in California (CWHR 2019).	species. There are three CNDDB records in the search area; however, none are within five miles of the site.
Greater sandhill crane *Grus candensis*	–	T;FP	Yes	Wintering visitor to Central Valley. Often found in large agricultural habitats, seasonally managed wetlands, and freshwater marsh. Prefers open shortgrass plains, grain fields and open wetlands when foraging.	Not expected to occur. Site lacks suitable habitat for the species. No recorded occurrences within five miles of the site.
Loggerhead shrike *Lanius ludovicianus*	–	SC	Yes	Nests in a densely-foliaged shrub or trees. Prefers open grasslands or scrub with shrubs or trees and low, sparse herbaceous cover with perches available (fences, posts, utility lines). In California, the critical nesting season is from March into August (CHWR 2019).	Could occur. The valley grassland provides suitable foraging habitat and potential nesting habitat. There are no known CNDDB records of loggerhead shrike in Sacramento County; however, this species is frequently observed in open grasslands in the Central Valley, including portions of Sacramento County as indicated by eBird (2021) observations. Further discussion below.
Northern harrier *Circus cyaneus*	–	SC	Yes	Breed and forage in a variety of open (treeless) habitats that provide adequate vegetative cover, an abundance of suitable prey, and scattered hunting, plucking, and lookout perches such as shrubs and fence posts. Habitats include freshwater marshes, brackish and saltwater marshes, wet meadows, weedy borders of lakes, rivers and streams, annual and perennial grasslands, vernal pool complexes, weed fields, ungrazed or lightly grazed pastures, low-growing crop fields, sagebrush flats, and desert sinks (Shuford and Gardali 2008).	Not expected to occur. Although there is a drainage channel at the northern end of the property, the site is located in a busy, urban area and is less than an acre in size. There are no recorded occurrences within CNDDB.
Swainson's hawk *Buteo swainsoni*	–	T	Yes	Forages in grasslands and agricultural lands; nests in riparian and isolated trees.	Could occur. There are 97 CNDDB occurrences within the search area. Closest occurrence is located approximately 1.82 miles southwest of the project site. The site contains multiple trees along the northern bank of the drainage channel that could provide suitable nesting habitat. Further discussion below.
Tricolored blackbird *Agelaius tricolor* (nesting colony)	–	T	Yes	Forages in agricultural lands and grasslands; nests in marshes, riparian scrub, and other areas that support cattails or dense thickets of shrubs or herbs. Requires open water and protected nesting substrate, such as flooded, spiny, or thorny vegetation (Schuford and Gardali 2008: 439).	Not expected to occur. The site lacks dense vegetation that the species would nest in and is located within an urban setting. The closest record (2008) is located approximately 0.64 miles northeast of the site—colony is considered extant. Further discussion below.
White-tailed kite *Elanus leucurus*	–	FP	Yes	White-tailed kites occur in herbaceous and open stages of most habitats in cismontane California. Areas with substantial groves of	Could occur. Large trees onsite could potentially provide nesting habitat. There are 14 CNDDB records within the search area, with the closest

Species	Listing Status[1]			Habitat	Potential for Occurrence[2]
	Federal	State	SSHCP		
				dense, broad-leafed deciduous trees are used for nesting and roosting. Nests are typically located from 20 to 100 feet above the ground near the top of dense oak, willow, or other tree stands, and are often located near an open foraging area with a dense population of voles (CWHR 2019).	record located 3.02 miles south of the project site. Valley grasslands on-site provide potential foraging habitat. Trees at north bank of drainage channel and eucalyptus grove could provide suitable nesting habitat. Further discussion below.
		Mammals			
American badger *Taxidea taxus*	–	SC	Yes	Suitable habitat occurs in the drier open stages of most shrub, forest, and herbaceous habitats with friable soils. Badgers are generally associated with treeless regions, prairies, parklands, and cold desert areas.	Not expected to occur. No suitable habitat, project site is small and does not contain friable soils. There are three known CNDDB records with the search area, with the nearest occurrence located approximately 2.37 miles northeast of the site.
Western red bat *Lasiurus blossevillii*	–	SC	Yes	This species roost primarily in trees along edge habitats adjacent to streams, fields, or urban areas. The species can be found within either natural or human-made structures, such as caves, mines, crevices (including under bridges), hollow trees, and in abandoned or seldom-used buildings. Young are born to the species in the spring and early summer (maternity colonies typically begin to form in April, and births occur from May through early July).	Could occur. There are no known occurrences of western red bat within five miles of the project area; however, trees along north bank of the drainage channel could provide suitable habitat. This area is excluded from the project site by a fence and the drainage channel—vegetation removal would not occur in this area and therefore, roosting bats would not be disturbed.

Note: CNDDB = California Natural Diversity Database; USFWS = U.S. Fish and Wildlife Service; SSHCP = South Sacramento Habitat Conservation Plan

[1] Legal Status Definitions

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

[2] Potential for Occurrence Definitions

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

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

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

Source: CDFW 2021, CNDDB 2021, USFWS 2021, Salix 2021

As noted in Table IS-8, several special status species and SSHCP-covered species have the potential to occur on the project site. Species not expected to occur are not discussed further. Species with potential to occur are discussed below.

BURROWING OWL

According to the CDFW life history account for the species, burrowing owl (*Athene cunicularia*) habitat can be found in annual and perennial grasslands, deserts, and arid scrublands characterized by low-growing vegetation. Burrows are the essential

component of burrowing owl habitat. Both natural and artificial burrows provide protection, shelter, and nesting sites for burrowing owls. Burrowing owls typically use burrows made by fossorial mammals, such as ground squirrels or badgers, but also use human-made structures such as cement culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement. Burrowing owls are listed as a California Species of Special Concern due to loss of breeding habitat.

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

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

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

DISCUSSION OF PROJECT IMPACTS: BURROWING OWL

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

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

GIANT GARTER SNAKE

Giant garter snake (GGS; *Thamnophis gigas*) is listed as Threatened, by the state and federal governments. The species can be found in slow-moving streams, sloughs, ponds, marshes, inundated floodplains, rice fields, and irrigation/drainage ditches on the Central Valley floor with mud bottoms, earthen banks, emergent vegetation, abundant small aquatic prey and absence or low numbers of large predatory fish. It is important to note that the species requires upland refugia not subject to flooding during the snake's inactive season.

DISCUSSION OF PROJECT IMPACTS: GIANT GARTER SNAKE

The drainage channel at the north end of the parcel has a natural mud bottom and aerial imagery shows ample vegetation within the channel as well as water in summer months. There are seven occurrences within the CNDDB search area, with the nearest occurrence located 3.59 miles southwest of the site at Regional San's Bufferlands. The development area provides upland grasslands, but lacks rodent burrows needed for refugia in the inactive season. Construction activities will occur within 200 feet of aquatic habitat. The project will be required to comply with the SSHCP's AMMs.

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

LOGGERHEAD SHRIKE

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

DISCUSSION OF PROJECT IMPACTS: LOGGERHEAD SHRIKE

Suitable habitat is present for nesting and foraging on and near the project site. There are no known CNDDB records of loggerhead shrike in Sacramento County; however, this species is frequently observed in open grasslands in the Central Valley, including portions of Sacramento County as indicated by eBird (2021) observations.

Development of the site would result in potential nesting and foraging habitat for the species. Compliance with the SSHCP AMMs for raptors will be required. Although the species is not a raptor, it is grouped in with the raptor AMMs because of its use of impaling sites. With participation in the SSHCP and compliance with the AMMS for raptors, impacts to the species are considered ***less than significant***.

SWAINSON'S HAWK

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

DISCUSSION OF PROJECT IMPACTS: SWAINSON'S HAWK

Suitable habitat is present for nesting and foraging on and near the project site. Construction activities associated with the proposed project would result in the loss of potential foraging habitat (Valley Grassland) and noise from construction activities have the potential to disturb any active nests that may be located along the drainage channel. In order to avoid potential impacts to the species, compliance with the SSHCP AMMs for Swainson's hawk will be required.

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

WHITE-TAILED KITE

White-tailed kite is a CDFW fully protected species. White-tailed kites occur in herbaceous and open stages of most habitats in cismontane California. Areas with substantial groves of dense, broad-leafed deciduous trees are used for nesting and roosting. They also roost in saltgrass and Bermuda grass in southern California. White-tailed kite breeds from February to October, with peak activity from May to August. Nests are typically located from 20 to 100 feet above the ground near the top of dense oak, willow, or other tree stands, and are often located near an open foraging area with a dense population of voles (CWHR 2019).

DISCUSSION OF PROJECT IMPACTS: WHITE-TAILED KITE

The valley grasslands on-site provide potential foraging habitat for the species. The trees along the north bank of drainage channel and the eucalyptus grove at the south end of the property could provide suitable nesting habitat. There are 14 CNDDB records within the search area, with the closest record located 3.02 miles south of the project site. Development of the site will result in a loss of potential nesting and foraging habitat for the species. Compliance with the SSHCP AMMs for raptors will be required.

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

WESTERN POND TURTLE

The western pond turtle (*Emys marmorata*)[2], is listed as a California Species of Special Concern by CDFW. According to the Fish and Wildlife Life History Account for the species, the western pond turtle is an aquatic turtle that usually leaves the aquatic site to reproduce, to aestivate, or to overwinter. Western pond turtles require some slack- or slow-water aquatic habitat. High-gradient streams with minimal cover or basking habitat are not suitable. In pond environments the species typically only leaves the water to

[2] The western pond turtle was identified as being comprised of two subspecies, one of which was the northwestern pond turtle (*Clemmys marmorata marmorata*). It is still listed as such in the Fish and Game Life History Account, as the account was written in 1994; however, the current special animals list clarifies that subsequent research has shown that the subspecies designations were not warranted, and the western pond turtle is now tracked only by species, not subspecies.

reproduce, whereas in stream environments the turtles more commonly leave the water to aestivate or overwinter, in addition to leaving for reproduction. Turtles leave the water to overwinter in October or November, and typically become active in March or April. Mating typically occurs in late April or early May, but may occur year-round. Most egg-laying occurs in May or June, but may occur as early as April or as late as August. The hatchlings remain in the nest over the winter, and emerge in the spring. Suitable nesting locations have dry soils (usually in a substrate with a high clay or silt fraction) on a slope that is unshaded and may be at least partially south-facing. The nest site can be up to 1,300 feet from the aquatic habitat, but it is more typical for the nest to be within 650 feet of aquatic habitat. The Life History Account conservatively recommends a buffer of 1,650 feet to ensure that neither adults nor nests will be impacted.

DISCUSSION OF PROJECT IMPACTS: WESTERN POND TURTLE

There are seven occurrences within the CNDDB search area with the nearest occurrence located 2.85 miles southwest of the site. The drainage channel at the north end of the parcel has a natural mud bottom and aerial imagery shows ample vegetation within the channel as well as water in several summer months. The drainage channel and surrounding upland may provide suitable habitat for the species; however, there is a chain-link fence between the development area and the drainage channel, which would likely exclude the species from the area proposed for construction.

Construction activities will occur within 100 feet of the aquatic habitat. The project will be required to comply with the SSHCP's AMMs.

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

WESTERN RED BAT

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

DISCUSSION OF PROJECT IMPACTS: WESTERN RED BAT

There are no known occurrences of western red bat within five miles of the project area; however, trees along north bank of the drainage channel could provide suitable roosting habitat. This area is excluded from the project site by a fence and the drainage channel—vegetation removal would not occur in this area and therefore, roosting bats are unlikely disturbed.

With participation in the SSHCP and compliance with the AMMS for western red bats, impacts to the species are considered ***less than significant***.

MIGRATORY NESTING BIRDS

The Migratory Bird Treaty Act of 1918, which states "unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(18) of FESA defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take." To avoid take of nesting migratory birds, minimization measures have been included to require that activities, either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded.

DISCUSSION OF PROJECT IMPACTS: MIGRATORY NESTING BIRDS

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

With mitigation impacts to migratory nesting birds are ***less than significant***.

CULTURAL RESOURCES

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

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

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

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

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

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

CULTURAL SETTING

A cultural report was prepared for the project by Peak & Associates, Inc. (Peak). The following information and analysis is based on these reports.

A search of records and historical information on file at the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) was conducted on October 1, 2021 for the project area and a 1/4-mile buffer. The record search did not find any previously recorded reports within the project area or buffered radius, nor did it find previously recorded cultural resources.

Peak conducted a field survey of the project site on October 3, 2021. The archaeologists walked parallel transects of five to ten-meter separation. The survey efforts did not identify evidence of prehistoric or historic-era cultural resources.

CULTURAL RESOURCES PROJECT IMPACTS

No cultural resources were identified within the project area during the pedestrian survey. If previously unidentified cultural resources are encountered during project implementation, a qualified professional archeologist should be contacted to evaluate the resource. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

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

There are no known cultural or archeological resources on the project site, but mitigation has been included to ensure that if any are found during groundbreaking activities, all construction is to be halted and Planning and Environmental Review (PER) is to be contacted immediately. Impacts related to cultural resources from the project 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:

    a) 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

    b) 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

Peak submitted a Sacred Lands File Search (SLFS) request to the Native American Heritage Commission (NAHC) on November 5, 2021. On November 7, 2021, the NAHC responded that there was a positive SLFS for the project site. The letter indicated that Ione Band of Miwok Indians (Ione) and the United Auburn Indian Community (UAIC) should be contacted for information regarding known and recorded sites.

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to Ione, UAIC, and Wilton Rancheria on December 30, 2021. Two responses were received from Wilton Rancheria and UAIC requesting consultation pursuant to AB 52.

DISCUSSION OF PROJECT IMPACTS – TRIBAL CULTURAL RESOURCES

Tribes indicated that the project site was in the general vicinity of known resources, but that they were not aware of tribal cultural resources on-site. In the event that TCRs are uncovered during ground disturbing activities, unanticipated discovery mitigation has been included specifying that work be stopped within a 100-foot radius of any discoveries, that the PER and tribal representatives from culturally affiliated tribes shall be contacted. Work within the radius shall not be resumed, until it is determined, in consultation with culturally affiliated tribes, that the find is not a TCR, or that the find is a TCR and all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB 52, has been satisfied. Preservation in place is the preferred alternative under CEQA and UAIC protocols, and every effort must be made to preserve the resources in place, including through project redesign. With this mitigation in place, project impacts to tribal cultural resources will be ***less than significant***.

HAZARDS AND HAZARDOUS MATERIALS

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

- 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.

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

Sacramento County is responsible for enforcing the state regulations, both in the City of Sacramento and the County, governing hazardous waste generators, hazardous waste storage, and underground storage tanks (including inspections, enforcement and removals). The Sacramento County Environmental Management Department (EMD) regulates the use, storage and disposal of hazardous materials in Sacramento County by issuing permits, monitoring regulatory compliance, investigating complaints, and other enforcement activities. The EMD oversees remediation of certain contaminated sites resulting from leaking underground storage tanks.

The GeoTracker and EnviroStor databases are resources for identifying environmental data related to hazardous materials (including the location of leaking storage tanks, cleanup sites, disposal sites, monitoring wells, sites with hazardous waste permits and the status of such sites). The databases are maintained by the State Water Resources Control Board and the State Department of Toxic Substances Control, respectively. The databases did not identify any open or closed hazardous waste cases within the proposed project limits; however, the cultural report prepared for the property described historic agricultural operations on the parcel.

Until the mid-1980s, lead was an additive used in gasoline and other fuels. Lead particles were emitted via vehicle exhaust and aerially deposited along freeways and roads. Frequently traveled roads, such as freeways, commonly have higher concentrations of lead deposits within exposed soils near the pavement. The highest concentrations are typically within 10 feet of the roadway. Lead can be found up to 30 feet from the edge of the pavement, but at much lower concentrations (Department of Toxic Substances Control 2016). Disturbance of contaminated soils can result in exposure of these toxic particles via respiration or ingestion.

Pesticides and fertilizers were widely used post World War II. If uncovered and not remediated, residual chemicals can have an adverse effect on public health. Agricultural and related businesses often stockpile pesticides, petroleum products, fertilizers, paints, and other chemicals. A discussion related to hazards and hazardous materials is warranted on the use pesticides for prior agricultural activities.

HISTORIC ENVIRONMENTAL SETTING

The cultural report prepared by Peak indicates that agricultural operations in the project area date back to the late 19th century. County aerial imagery from the 1937 depict row cropping on the neighboring parcel to the east but not within the project limits. The next available County aerial image from 1953 shows the parcel had been developed with a residence along 48th Avenue and several accessory buildings as well as trees throughout the site. The neighboring parcels may have still been used for agricultural operations at that time, but by 1964, State Highway 99 was constructed through many of the larger agricultural tracts in the vicinity and operations had ceased.

DISCUSSION OF PROJECT IMPACTS: HAZARDOUS MATERIALS

AERIALLY DEPOSITED LEAD (ADL)

The project site is located near State Highway 99; however, the project site is located over 500 feet from the southbound section of Highway 99. The nearest section of the highway is the southbound on-ramp, which is located approximately 100 feet north of the proposed construction area. The project would not disturb exposed soils near either area of Highway 99 and is located well outside the 30-foot buffer of the right-of-way; therefore, disturbance of ADL contaminated soils is highly unlikely. Soil testing for ADLs will not be required.

AGRICULTURAL OPERATIONS

Although the cultural report mentions the parcel likely was used for agricultural purposes in the late 19th century, County aerial imagery from 1937 shows trees throughout the parcel site and that row crops were located on the parcels to the east of the subject property. By the 1953, the site had been developed with several structures and imagery from that period shows trees throughout the site. Since pesticide and fertilizer use is associated with post-World War II agricultural operations, it is unlikely that either were ever used on the subject property, as County aerial images do not show evidence of row crops on the parcel from the 1930s on.

Impacts related to hazardous materials are ***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.[3]

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 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.

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[3] 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.

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 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. County Staff prepared a final draft of the CAP, which was heard at the Planning Commission on October 25, 2021. County staff is now working to address comments received from the Planning Commission, prior to bringing a revised CAP to the County Board of Supervisors.

Thresholds of Significance

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

In April 2020, SMAQMD adopted an update to their land development project operational GHG threshold, which requires a project to demonstrate consistency with CARB's 2017 Climate Change Scoping Plan. 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-9. 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-9.

Table IS-9: SMAQMD Thresholds of Significance for Greenhouse Gases

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

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 considered ***less than significant***.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

The project will implement BPM 1 and BMP 2 in its entirety. As such, the project can be compared to the operational screening table. CalEEMod was used to estimate annual operational emissions (Appendix E). Operational emissions for the proposed use is estimated to generate 208 metric tons of CO_2e per year. The operational emissions associated with the project are less than 1,100 MT of CO_2e per year. Mitigation has been included such that the project will implement BMP 1 and BMP 2. The impacts from GHG emissions are ***less than significant with mitigation***.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures are critical to ensure that identified 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 _____ 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: PARTICIPATION IN THE SSHCP

To compensate for impacts to approximately 1.31 acres of Valley Grassland and 0.0009 acres of Stream/Creek, the applicant shall obtain authorization through the SSHCP and conform with all applicable Avoidance and Minimization Measures (Appendix D), as well as payment of fees necessary to mitigate for impacts to species and habitat prior to construction.

MITIGATION MEASURE C: REGULATORY PERMITS AND AGREEMENTS FOR WORK WITHIN CHANNEL EMBANKMENT

In addition to any necessary permit coverage extended through the SSHCP permitting process, the project proponent shall secure all necessary regulatory permits and/or agreements for work associated with the proposed drainage outfall within the top of bank area of the drainage channel, prior to construction.

The project proponent shall submit copies of final permits and agreements received to Sacramento County Planning & Environmental Review (PER). If a regulatory agency determines that permits are not necessary, the project proponent shall provide PER with correspondence to that effect.

MITIGATION MEASURE D: MIGRATORY BIRD NEST PROTECTION

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

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and September 15, a survey for active migratory bird nests shall be conducted no more than 14 day prior to construction by a qualified biologist.

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

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

MITIGATION MEASURE E: INADVERTENT DISCOVERY OF 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 cultural resources discovered during project's ground disturbing activities, work shall be halted until a qualified archaeologist 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.

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 F: UNANTICIPATED DISCOVERIES (TRIBAL CULTURAL RESOURCES)

If any Tribal Cultural Resources (TCRs) are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. The appropriate tribal representatives from the culturally affiliated tribe(s) shall be immediately notified.

Work at the discovery location cannot resume until it is determined, in consultation with culturally affiliated tribes, that the find is not a TCR, or that the find is a TCR and all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB 52, has been satisfied. Preservation in place is the preferred alternative under CEQA and UAIC protocols, and every effort must be made to preserve the resources in place, including through project redesign.

The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary.

MITIGATION MEASURE G: 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. CalGreen Tier 2 standards for multi-family residential projects require 20% of parking to be made EV Ready. The project proponent shall provide a minimum of two EV Ready parking spaces.

- 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 Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is **$5,700.00**. This fee includes administrative costs of $1039.00.

2. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

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

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

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. **LAND USE** - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, South Sacramento Community Plan, SMUD Substation in South Sacramento Neighborhood Preservation Area, and Sacramento County Zoning Code.
b. Physically disrupt or divide an established community?			X		The project would not substantially limit movement within or through the community. The proposed project consists of a gated-residential development, which is already bordered by another gated, residential development to the west and a drainage channel to the north. The parcel to the east is undeveloped. Access through the area is provided via public roads and sidewalks along 48th Avenue.
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 proposal is consistent with existing land use designations and is within an area designated for urban growth and uses and existing public infrastructure and utilities.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project would result in minor increases to student population; however, the increase would not require the construction/expansion of new unplanned school facilities. Established case law, *Goleta Union School District v. The Regents of the University of California* (36 Cal-App. 4th 1121, 1995), indicates that school overcrowding, standing alone, is not a change in the physical conditions, and cannot be treated as an impact on the environment.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will result in increased demand for park and recreation services, but meeting this demand will not result in any substantial physical impacts.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The project is considered a “small project” as it would result in less than 237 average daily trips and therefore screens out under the County of Sacramento Department of Transportation Screening Criteria. Projects that screen out are presumed to have a less than significant impact.

	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 would not result in a substantial adverse impact to access or circulation. 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 would not result in a substantial adverse impact to public safety on area roadways. The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.
8. **AIR QUALITY** - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. Compliance with existing dust abatement rules and standard construction mitigation for vehicle particulates will ensure that construction air quality impacts are less than significant. Refer to the Air Quality discussion in the Environmental Effects section above.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		The project would not expose sensitive receptors to pollutant concentrations in excess of standards. See Response 8.a.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Create objectionable odors affecting a substantial number of people?				X	The project will not generate objectionable odors.
9. **NOISE -** Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The project is in the vicinity of State Highway 99, but is within residential noise standards established by the County General Plan without mitigation. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards. Refer to the Noise discussion in the Environmental Effects section above.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will 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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		The project includes minor drainage improvements, but would not substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding. Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
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 site is in a local flood hazard area, but not in a federally mapped floodplain. Compliance with the County Floodplain Management Ordinance, County Drainage Ordinance, and Improvement Standards will ensure less than significant impacts. Refer to the Hydrology discussion in the Environmental Effects section above.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?				X	The project site is not within a 100-year floodplain.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?			X		The project is located in an area subject to 200-year urban levels of flood protection (ULOP). Refer to the Hydrology discussion in the Environmental Effects section above.
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		The project would not create or contribute to runoff that would exceed the capacity of the existing drainage system. With compliance with the Sacramento County Floodplain Management Ordinance and Improvement Standards impacts would be less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. **GEOLOGY AND SOILS** - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction. Refer to the Geology and Soils discussion in the Environmental Effects section above. Mitigation has been included to ensure that impacts are less than significant.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		A public sewer system is available to serve the project.
e. Result in a substantial loss of an important mineral resource?				X	The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X	No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. **BIOLOGICAL RESOURCES** - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?		X			The project would not result in an adverse impact on any special status species or substantially reduce their associated habitat. Mitigation is included to reduce impacts to less than significant levels. Refer to the Biological Resources discussion in the Environmental Effects section above.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		The subject parcel has a drainage channel which runs to the southeast at the northern end of the property; however, development is not proposed within the channel and therefore, would not affect it. The project would not result in an adverse effect on riparian habitat or other sensitive natural communities. Refer to the Biological Resources discussion in the Environmental Effects section above.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		The subject parcel has a drainage channel which runs to the southeast at the northern end of the property; however, development is not proposed within or immediately adjacent to the channel and therefore, would not it. Refer to the Biological Resources section.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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. Refer to the Biological Resources section.
e. Adversely affect or result in the removal of native or landmark trees?			X		No native and/or landmark trees occur on the project site, nor is it anticipated that any native and/or landmark trees would be affected by off-site improvement required as a result of the project.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?		X			The project is within the Urban Development Area of the South Sacramento Habitat Conservation Plan (SSHCP). The project shall comply with the applicable avoidance and minimization measures outlined in the SSHCP. Refer to the Biological Resources discussion in the Environmental Effects section above.
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?				X	No historical resources would be affected by the proposed project.
b. Have a substantial adverse effect on an archaeological resource?			X		No known archaeological resources occur on-site. The Northern California Information Center was contacted regarding the proposed project. No recorded resources or previous reports are associated with the subject parcel. No recorded resources or prior cultural reports were within the ¼-mile search area.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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.
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 two requests for consultation were received from UAIC and Wilton Rancheria. Tribal cultural resources were 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.
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. See Hazardous Materials section of the IS.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X	The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The project is not located on a known hazardous materials site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		While the project will introduce 26 apartment units, which would increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are net resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
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 fully comply with the SMAQMD GHG Tier 1 BMPs. As such, the project screens out of further analysis and impacts are less than significant. See the GHG discussion above.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	Medium Density Residential	X		
Community Plan	RD-20	X		South Sacramento Community Plan
Land Use Zone	RD-20 (Multi-family Residential)		X	Inconsistent with perimeter landscaping requirements, but would be consistent upon approval of the Special Development Permit.

INITIAL STUDY PREPARERS

Environmental Coordinator: Joelle Inman

Senior Environmental Analyst: Meg de Courcy

Associate Environmental Analyst: Josh Greetan

Office Manager: Belinda Wekesa-Batts

Administrative Support: Justin Maulit

APPENDICES

Appendix A: Noise Assessment. RNS Acoustics, October 2021

Appendix B: Biological Report. Salix Consulting, Inc., January 2022

Appendix C: Arborist Report. California Tree and Landscape Consulting, Inc., September 2019.

Appendix D: South Sacramento Habitat Conservation Plan Avoidance and Minimization Measures

Appendix E: CalEEMod Annual Report

REFERENCES

State of California Department of Toxic Substances Control. *Statewide Agreement for Caltrans for Reuse of Aerially Deposited Lead-Contaminated Soils*, March 2016.