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:** PLER2022-00006

2. **Title and Short Description of Project:** 7340 28th Street Grading Permit
   The proposed project is a request for a grading permit on a 9.8 acre parcel in the North Highlands community. The entire parcel is proposed to be graded with the amount of material to be cut estimated at 10,653 cubic yards and the amount to be filled estimated at 10,546 cubic yards. The amount of cut and fill are approximately balanced on the site. However, it should be noted that the calculation of cut and fill was done using land desktop volume calculator from existing grade and proposed finish grade terrain models, using the grid method. Exact excavation volume will be determined at time of field excavation. The proposed grading activity supports future development of the site consistent with County zoning regulations.

3. **Assessor's Parcel Number:** 208-0071-008

4. **Location of Project:** The project site is located at 7340 28th Street, approximately 950 feet north of Q Street, in the North Highlands community

5. **Project Applicant:** Pulltail Inc.

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

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

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

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

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLER2022-00006

NAME: 7340 28th Street Grading Permit

LOCATION: The project site is located at 7340 28th Street, approximately 950 feet north of Q Street, in the North Highlands community (reference Plate IS-1).

ASSESSOR'S PARCEL NUMBER: 208-0071-008

OWNER/APPLICANT: Pulltail Inc.
4513 Maryam Court
Fair Oaks, CA 95628
Contact: Henry Danielyan

ENGINEER: Top Engineering Inc.
2701 Compton Pare Lane
Carmichael, CA 95608
Contact: Val Tarasov

INTRODUCTION

Pursuant to Section 15002(i) of the California Environmental Quality Act (CEQA) Guidelines, "CEQA applies in situations where a governmental agency can use its judgement in deciding whether and how to carry out or approve a project. A project subject to such judgmental controls is called a 'discretionary project.'" According to the Sacramento County Code, Chapter 16.44.140 Land Grading and Erosion Control, grading and erosion control permits are considered discretionary projects and subject to the requirements of CEQA.

PROJECT DESCRIPTION

The proposed project is a request for a grading permit on a 9.8 acre parcel in the North Highlands community. The entire parcel is proposed to be graded with the amount of material to be cut estimated at 10,653 cubic yards and the amount to be filled estimated at 10,546 cubic yards. The amount of cut and fill are approximately balanced on the site. However, it should be noted that the calculation of cut and fill was done using land desktop

volume calculator from existing grade and proposed finish grade terrain models, using the grid method. Exact excavation volume will be determined at time of field excavation. The proposed grading activity supports future development of the site consistent with County zoning regulations. Reference Plate IS-2a through Plate IS-2c.

ENVIRONMENTAL SETTING

The project site is currently vacant and is generally flat, with topography ranging from 83 feet above sea level to the east, sloping down to 74 feet above sea level to the west adjacent to 28th Street. The site consists of mostly non-native grassland with a small patch of *Ailanthus altissima* (tree of heaven), an invasive species, in the southwest corner and a small grove of eucalyptus trees in the northwest corner of the property. No other trees occur on the property and no bird nests were observed in the vicinity of the project site. There are swales and some evidence of ponded water, however no vernal pools were observed at the time of the site visit, and grasses are well established throughout the site.

The project site has been altered due to placement of fill soil over the north central portion of the site. This fill placement changed the surface water drainage of the site. Surface water from the surrounding area is directed to the southeastern and southern property boundaries and connects with the historical drainage area that collects surface water from the south and exits the property through a culvert under 28th Street approximately half way up the western property boundary.

The project site is located within the North Highland Community Plan area, approximately 0.5 miles from the northern end of the McClellan Airport runway. The project site is zoned M-1 - Light Industrial, with a general plan designation of Intensive Industrial. The project site is within the safety zone for the airport and the 65 dB noise contour. Surrounding land uses are industrial to the west and south and agricultural-residential uses to the west and north.

Plate IS-1: Project Site (Aerial Photo 2022)

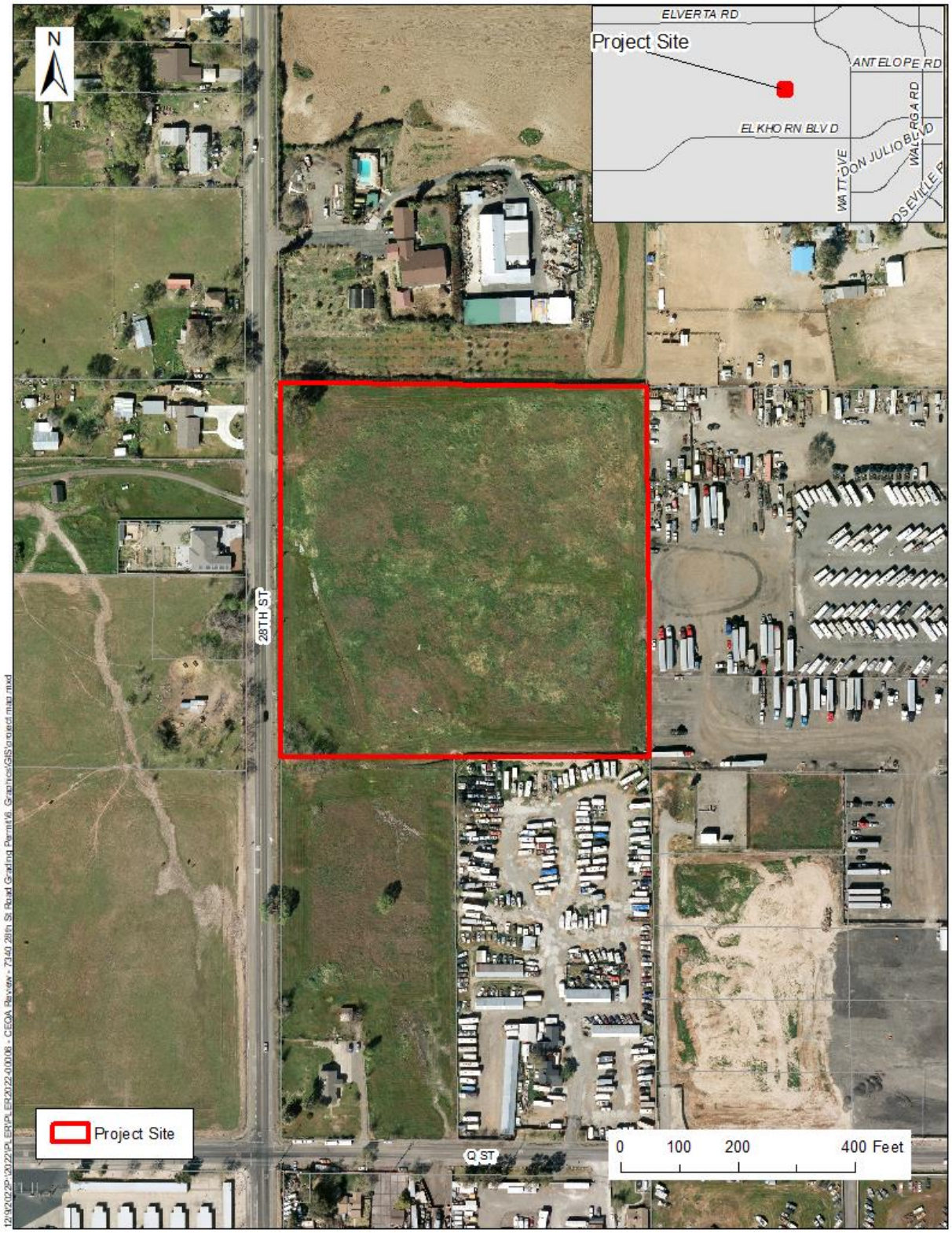


Plate IS-2a: Proposed Grading Plan – Overall

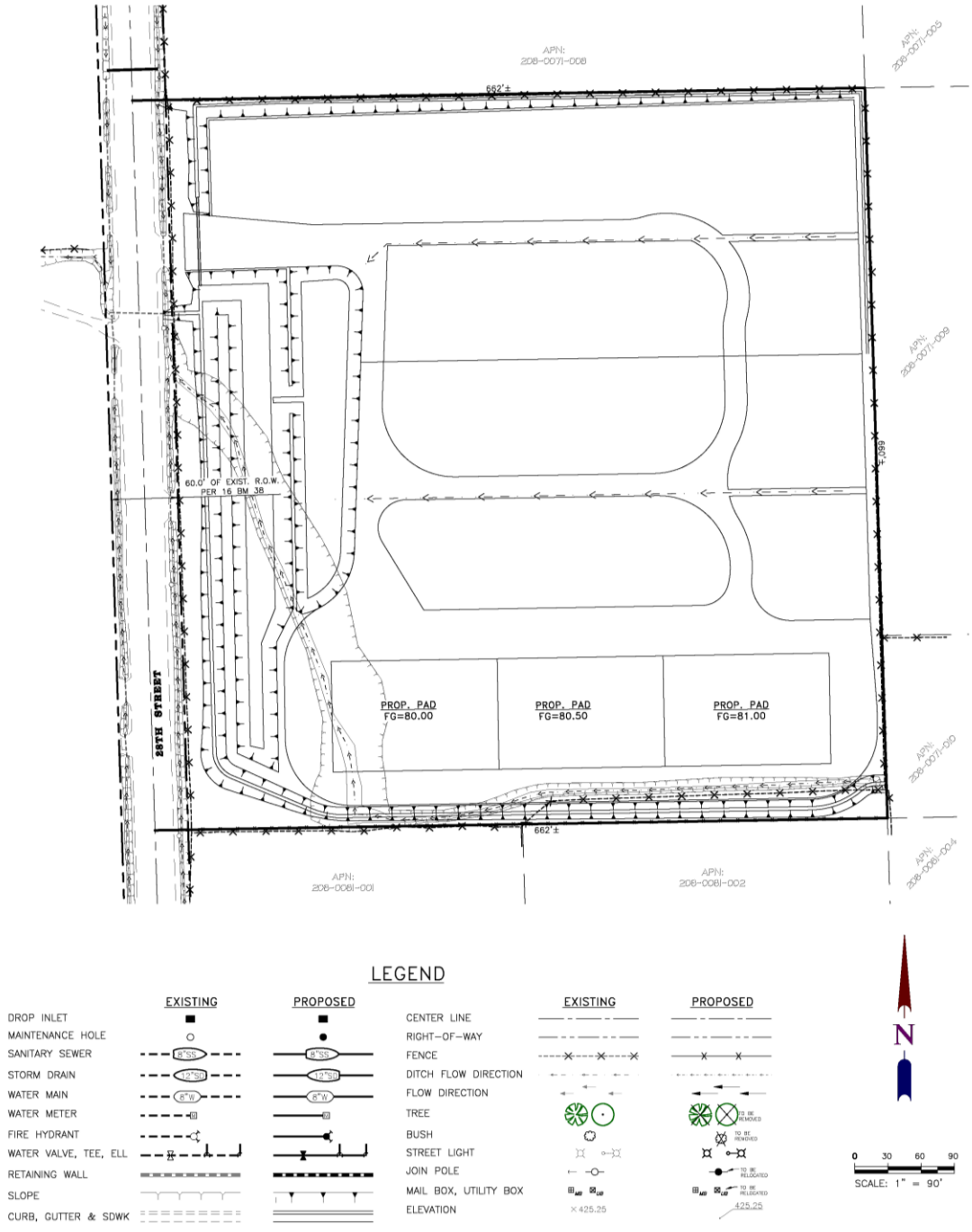


Plate IS-2b: Proposed Grading Plan – Northern Portion

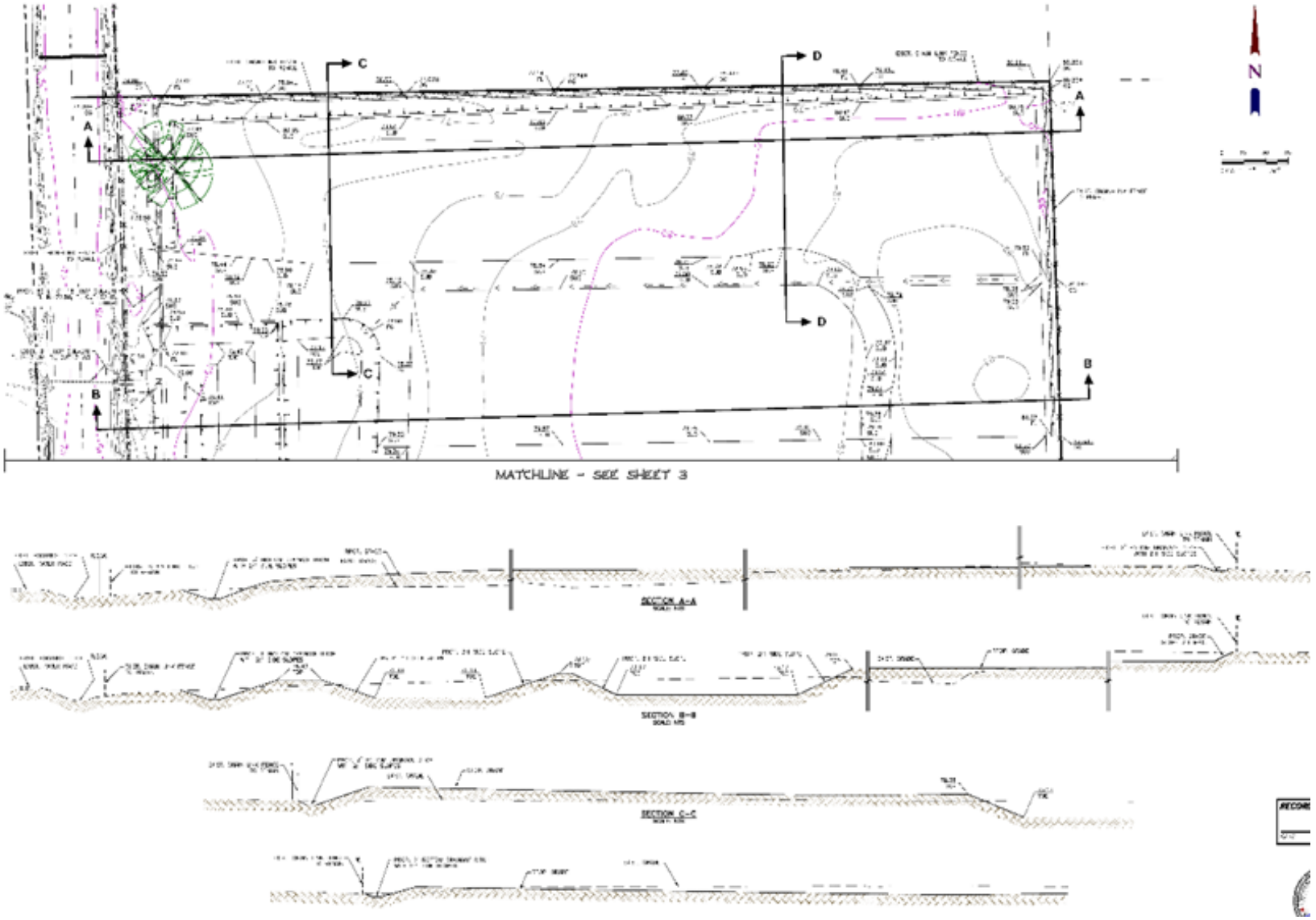
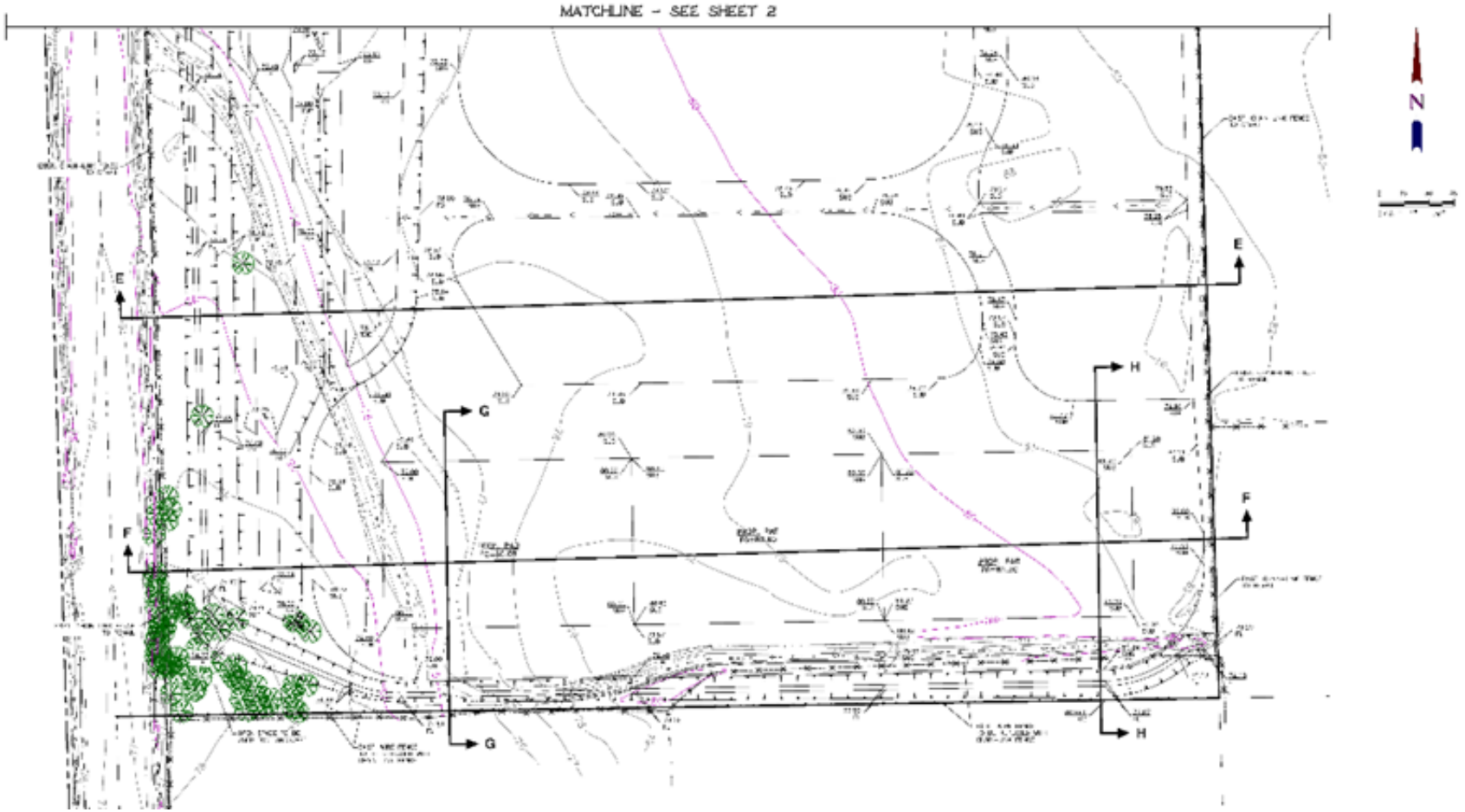


Plate IS-2c: Proposed Grading Plan – Southern Portion



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.

AIRPORTS

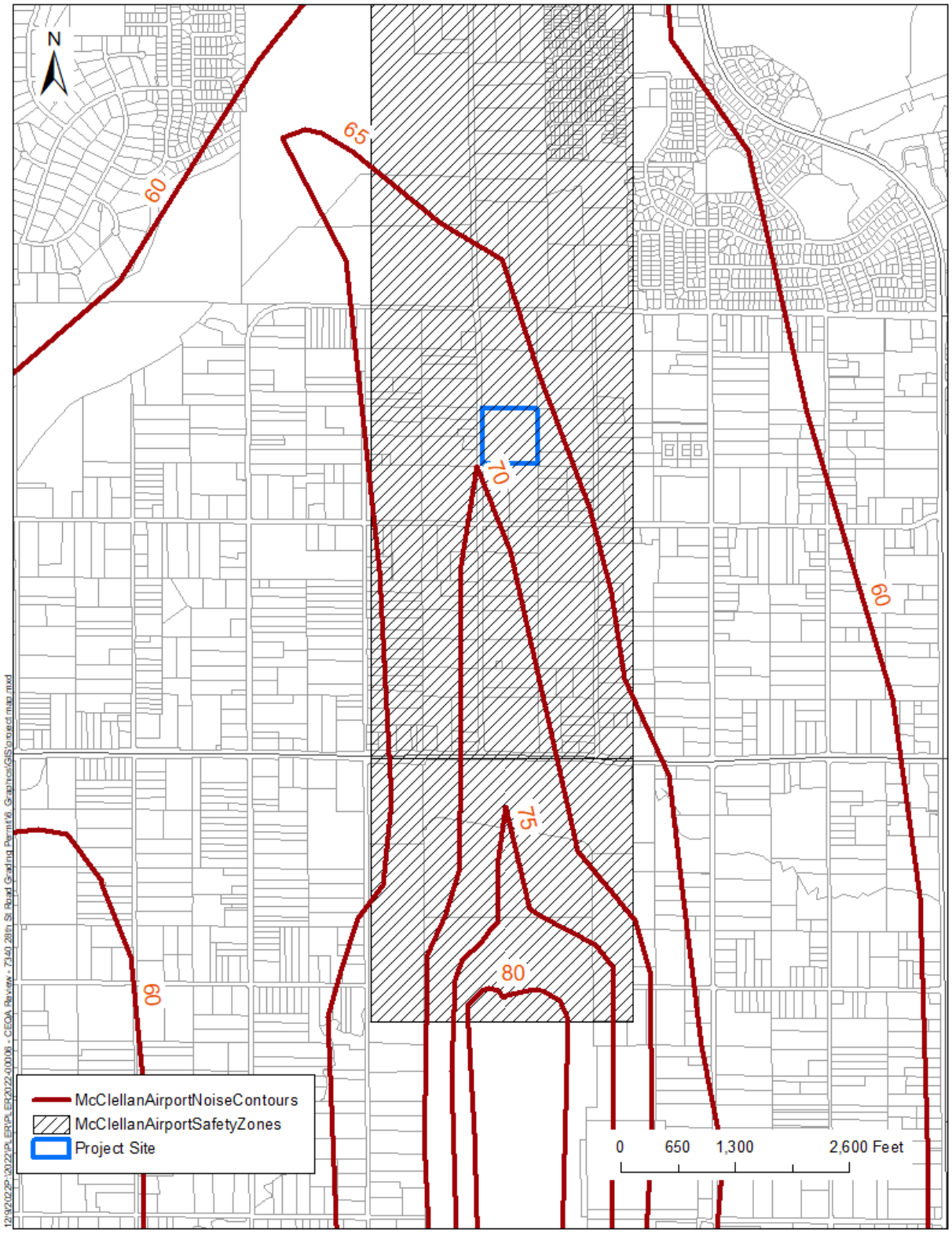
This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip

- Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards

Airports are required to prepare a Comprehensive Land Use Plan (CLUP). The purpose of the Airport Land Use Commission Law is to: 1. Protect public health, safety, and welfare through the adoption of land use standards that minimize the public's exposure to safety hazards and excessive levels of noise. 2. Prevent the encroachment of incompatible land uses around public-use airports, thereby preserving the utility of these airports into the future. The CLUP restricts the development of uses identified as sensitive receptors for noise and to reduce the risk to populations living in the vicinity of the airport, uses that are permitted are those allowed in M-1, Light Industrial, and M-2 Heavy Industrial zoning districts, areas further out from the airport could include commercial and some residential uses. For the areas with the McClellan safety zone, the CLUP identifies incompatible land uses as those uses that would interfere with airport operations such as landings and take offs therefore a major component is the regulation of buildings and other structure is the heights in the vicinity of landing/take off zones. Reference Plate IS-3 for McClellan safety zone and noise contours.

Plate IS-3: McClellan Airport Safety and Noise Contours



RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE VICINITY OF AN AIRPORT/AIRSTRIP

The project consists of the grading of land. The completed project will not involve the placement of persons living or working on the project site. Therefore, safety hazard impacts to people living or working in the vicinity of the airport would be ***less than significant***.

EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO AIRCRAFT NOISE LEVELS IN EXCESS OF APPLICABLE STANDARDS

While the project site is within the 65 dB noise contour, the proposed project consists of the grading of land. Construction workers on the project site would be temporary and the completed project would not expose people working in the project area to aircraft noise levels in excess of applicable standards and impacts would be ***less than significant***.

AIR QUALITY

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

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

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

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 PM10 or PM2.5 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 (9.8 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. However, the project does entail the use of cut and fill so the CalEEMod emissions model was run to determine if the project emissions would meet the SMAQMD Guide screening criteria for PM_{10} and $PM_{2.5}$ (reference Appendix A). Table IS-3 shows the results of the CalEEMod model run and whether the emissions are significant.

Table IS-3: Project Emissions

	ROG[1] (lbs/day)	NO_x (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Construction Threshold (short-term)	None	85	80[3*]	82[3*]
Construction emissions	2.19	20	4	4
Significant (Yes/No)	No	No	No	No
Operational Threshold (long-term)	65	65	80[3*]	82[3*]
Operational emissions	<0.1	<0.1	<0.1	<0.1
Significant (Yes/No	No	No	No	No

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.

The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. These requirements are already required by existing rules and regulations, and have also been included as mitigation. Impacts from PM_{10} and $PM_{2.5}$ emissions are ***less than significant***.

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 project site is less than 35 acres (9.8 acres) and does not involve buildings more than 4 stories tall; significant trenching activities; an unusually compact construction schedule; or, import or export of soil materials requiring a considerable amount of haul truck activity However, the project does entail the use of cut and fill so the CalEEMod emissions model was run to determine if the project emissions would meet the SMAQMD Guide screening criteria for Ozone precursors. Table IS-3 shows the results of the CalEEMod model run and whether the emissions are significant impacts. Based on the results shown on Table IS-3 the impacts to air quality from Ozone precursors are considered to be ***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. However, the proposed project once complete (grading finished), will not produce operational emission. As shown in Table IS-3 the results from the CalEEMod calculations show impacts related to operational emissions are expected to be ***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.
- Place structures that would impede or redirect flood flows within a 100-year floodplain.

- Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.

- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

Drainage and Flooding

The project site is within Zone X as determined by the 2012 FEMA Flood Insurance Rate Map, panel number 06067C009H.

Flood Zone X is defined as an area determined to be outside the 100-year floodplain, which indicates there is statistically, for insurance rate mapping purposes, a less than 0.2 percent chance of a flood event occurring on the site for any given year. The proposed project will alter the existing drainage course on the property to flow along the southern property line and north along the west side of the property to the existing culvert which carries surface and stormwater flows to the west. A drainage study (Level 4) was prepared for the project and has been reviewed by the Sacramento County Department of Water Resources. The Level 4 study shows how surface water flows will maintain pre-project outflow conditions. Development activities would result in no impacts to drainage and flooding; therefore, 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:

- 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 riparian habitat or other sensitive natural communities
- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies
- Adversely affect or result in the removal of native or landmark trees
- Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat

BIOLOGICAL RESOURCES – REGULATORY SETTING

FEDERAL REGULATIONS

FEDERAL ENDANGERED SPECIES ACT

The Federal Endangered Species Act (FESA) of 1973 protects species that are federally listed as endangered or threatened with extinction. FESA prohibits the unauthorized "take" of listed wildlife species. Take includes harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such activities. Harm includes significant modifications or degradations of habitats that may cause death or injury to protected species by impairing their behavioral patterns. Harassment includes disruption of normal behavior patterns that may result in injury to or mortality of protected species. Civil or criminal penalties can be

levied against persons convicted of unauthorized "take." In addition, FESA prohibits malicious damage or destruction of listed plant species on federal lands or in association with federal actions, and the removal, cutting, digging up, damage, or destruction of listed plant species in violation of state law. FESA does not afford any protections to federally listed plant species that are not also included on a state endangered species list on private lands with no associated federal action.

MIGRATORY BIRD TREATY ACT

The Migratory Bird Treaty Act (MBTA) prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale, purchase or barter, any native migratory bird, their eggs, parts, and nests, except as authorized under a valid permit (50 CFR 21.11.). Likewise, Section 3513 of the California Fish & Game Code prohibits the "take or possession" of any migratory non-game bird identified under the MBTA. Therefore, activities that may result in the injury or mortality of native migratory birds, including eggs and nestlings, would be prohibited under the MBTA.

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 U.S. Army Corps of Engineers 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 U. S. Army Corps of Engineers (USACE) is generally the lead agency for the federal permit process, and the Central Valley Regional Water Quality Control Board (CVRWQCB) 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.

STATE REGULATIONS

STATE ENDANGERED SPECIES ACT

With limited exceptions, the California Endangered Species Act (CESA) of 1984 protects state-designated endangered and threatened species in a way similar to FESA. For projects on private property (i.e. that for which a state agency is not a lead agency), CESA enables CDFW to authorize take of a listed species that is incidental to carrying out an otherwise lawful project that has been approved under CEQA (Fish & Game Code Section 2081).

CALIFORNIA FISH AND GAME CODE, SECTION 3503.5 - RAPTOR NESTS

Section 3503.5 of the Fish and Game Code makes it unlawful to take, possess, or destroy hawks or owls, unless permitted to do so, or to destroy the nest or eggs of any hawk or owl.

LOCAL REGULATIONS

COUNTY OF SACRAMENTO GENERAL PLAN

The Conservation Element of the Sacramento County General Plan (under Policy CO-58) currently provides protection to various ecosystems. Specifically, it "ensures no net loss of wetlands, riparian woodlands, and oak woodlands." The General Plan also seeks to protect landmark and heritage trees (collectively referred to as "protected trees"). "Landmark trees" are defined as ones that are "especially prominent and stately." "Heritage trees" are defined as native oaks that exceed 60 inches in circumference. Policies CO-137, CO- 138, CO-139, CO-140, and CO-141 encourage protection and preservation of landmark and heritage trees, and Policy CO-145 requires mitigation by creation of new tree canopy equivalent to the acreage of non-native tree canopy

SPECIAL STATUS SPECIES

SURVEYS AND STUDIES

The Biological Resources Assessment for the 28th Avenue Storage Facility Development Project prepared by Soar Environmental Consulting (Soar)(November 2022) addresses the biological resources in the project area (Appendix B). Studies included a floristic survey and analysis of potential special-status species. Soar reviewed and analyzed a variety of data from state and federal agencies. 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 United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB). Significance findings have been based on the impact conclusions of applicable surveys and studies.

The CNDDB records search indicated 13 State-listed special-status wildlife species most likely to occur within or near the project site would include:

- Bank swallow (*Riparia riparia*)
- California black rail (*Laterallus jamaicensis coturniculus*)
- Least Bell's vireo (*Vireo bellii pusillus*)
- Swainson's hawk (*Buteo swainsoni*)
- Tricolored blackbird (*Agelaius tricolor*)
- Western yellow-billed cuckoo (Coccyzus americanus occidentalis)
- Chinook salmon (Oncorhynchus tshawytscha)
- Longfin smelt (Spirinchus thaleichthys)
- Steelhead (Oncorhynchus mykiss irideus)
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)
- Vernal pool fairy shrimp (*Branchinecta lynchi*)
- Vernal pool tadpole shrimp (*Lepidurus packardi*)
- Giant gartersnake (*Thamnophis gigas*)

The IPaC search revealed 5 additional federally-listed sensitive wildlife species likely to occur within or near the project site include:

- California Red-legged (*Rana draytonii*)
- California Tiger Salamander (*Ambystoma californiense*)
- Delta Smelt (Hypomesus transpacificus)
- Conservancy Fairy Shrimp (*Branchinecta conservatio*)
- Monarch Butterfly (*Danaus plexippus*)

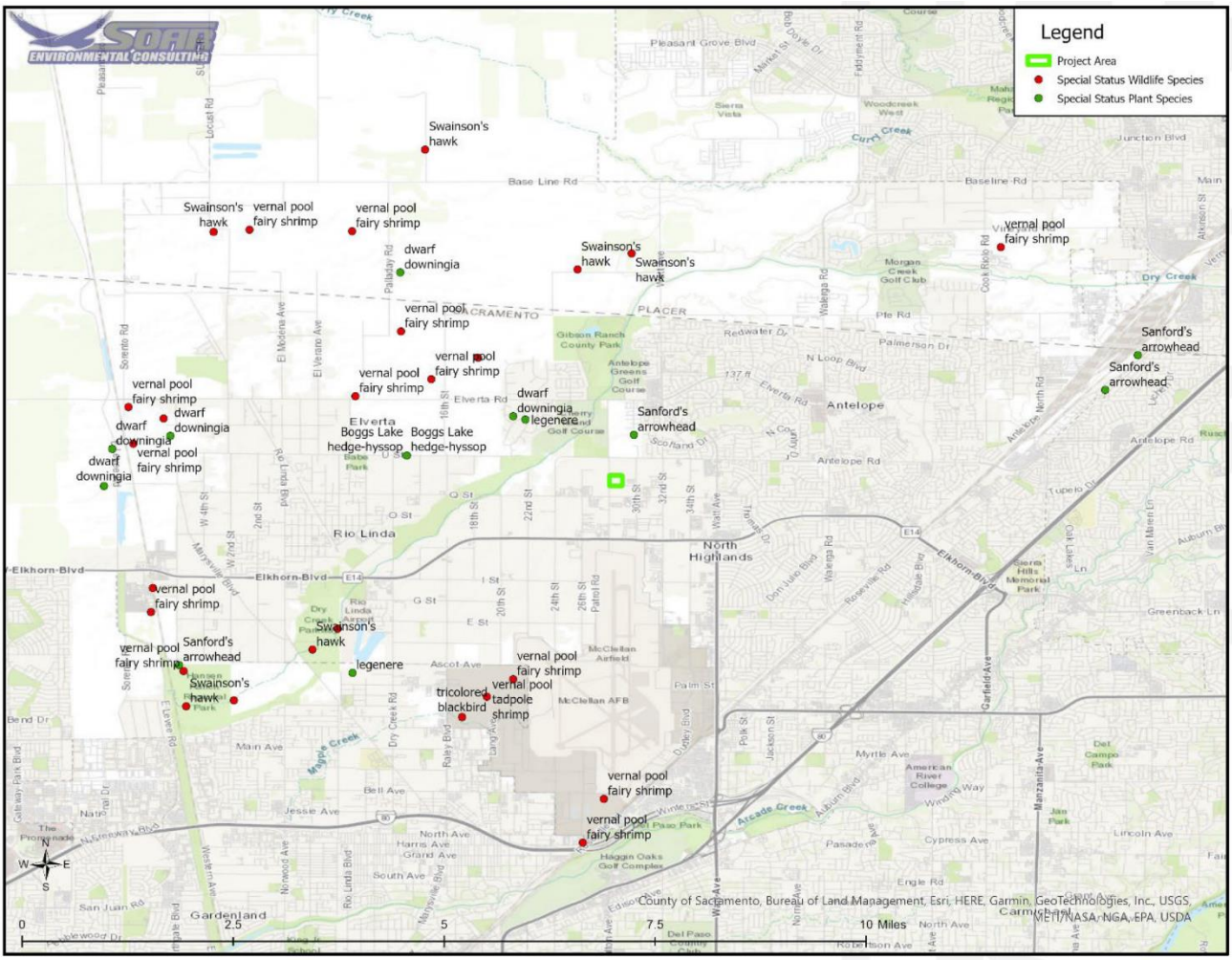
A search of the California Native Plant Society (CNPS) Online Rare Plant Inventory identified the following 4 special-status plant species likely to occur within or proximate to the project site:

- Boggs Lake hedge- hyssop (*Gratiola heterosepala*)

- Dwarf downingia (Downingia pusilla)
- Legenere (Legenere limosa)
- Sanford's arrowhead (Sagittaria sanfordii)

Of these species, four wildlife and four plant species have the potential to occur on the project site: Swainson's hawk, tricolored blackbird, vernal pool fairy shrimp, vernal pool tadpole shrimp, Boggs Lake hedge-hyssop, dwarf downingia, legenere, and Sanford's arrowhead. Reference Plate IS-4 for species exhibit.

Plate IS-4: CNDDB Species Map



SURVEY FINDINGS

On May 7, 2022, Soar Environmental conducted a habitat assessment (reference Appendix B) on the property for the above mentioned species. Walking the perimeter of the property, and meandering transects throughout the project site, the surveyor searched for signs of vernal pools, bird nests, identified vegetation, and looked for other signs of wildlife occupancy and suitable habitat for special status species identified above. Survey

efforts emphasized the search for special-status species that had documented occurrences in the data records search of the CNDDB, IPaC, and CNPS databases. After surveying the project site, the surveyor drove the roads within 0.5 mile surrounding the project footprint searching for potentially active nests, cavities in trees or powerline poles, vernal pools, special-status plant species, or any signs of wildlife occupancy or suitable habitat.

Field surveys did not observe special status species occupying the project site, nor was habitat observed on or nearby that would support special status species with the potential to occur onsite.

PROJECT IMPACTS

The project consists of the grading of land for future development. The grading will remove the ruderal grasses and redirect the onsite drainage swale. The eucalyptus trees in the northwest corner and approximately eight *Ailanthus altissima (tree of heaven)* trees are shown for removal on the grading plans.

SWAINSON'S HAWK

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

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

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

The project site is zoned light industrial and is not considered to retain habitat value pursuant to the County Swainson's Hawk Ordinance; therefore, this analysis focuses on the disturbing potential nesting habitat.

NESTING HABITAT IMPACT METHODOLOGY

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, CDFW recommends implementing the measures set forth in the California Fish and Wildlife Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California (November 1, 1994). These state that no intensive new disturbances, such as heavy equipment operation associated with construction, should be initiated within ¼-mile of an active Swainson's hawk nest in an urban setting or within ½-mile in a rural setting between March 1 and September 15.

The nearest recorded Swainson's hawk nest is located approximately 2.3 miles to the north. The project site is located north of the McClellan Airport runway and is surrounded on the east and south by industrial uses. As noted in the Biological Assessment, the project site and ½ mile buffer were observed for the presence of nesting raptors, including Swainson's hawk, during peak breeding season. No nests were observed in onsite trees, nearby trees and utility poles.

Due to the urbanized nature of the project area, and that no nests were observed within or nearby the project site, one pre-construction survey 30-days prior to the start of earth movement is sufficient to ensure impacts to Swainson's hawk are ***less than significant***.

TRICOLORED BLACKBIRD

The tricolored blackbird (*Agelaius tricolor*) is protected under the California Fish and Game Code (Sections 3503 and 3800). In March of 2019, tricolored blackbird was listed as a State threatened species under the California Endangered Species Act.

Reasons for decline of tricolored blackbird populations include loss of nesting and foraging habitat. According to the California Department of Fish and Wildlife Life History Account for the tricolored blackbird (*Agelaius tricolor*), the species is mostly a resident in California, and common locally throughout the Central Valley. The species is a colonial nester which breeds near fresh water, preferably in emergent wetland with tall, dense cattails or tules, but also in thickets of willow, blackberry, wild rose, and tall herbs. Nesting colonies usually support a minimum of 50 pairs. The species feeds in grassland and cropland habitats. The usual breeding season is mid-April into late July.

The project site does not have dense shrubs or emergent wetlands; therefore, there is no suitable nesting habitat for tricolored blackbirds on the project site. The proposed project ***will not impact*** tricolored blackbirds.

BURROWING OWL

According to the California Fish and Wildlife 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. Breeding season is generally defined as spanning February 1 to August 31 and wintering from September 1 to January 31. 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.

One ground squirrel burrow was observed on the property, but there was no evidence that it is being used by other species, such as burrowing owl. Burrowing owls were not observed and the nearest recorded occurrence is four miles to the west. Impacts to nesting burrowing owls are ***less than significant***.

VERNAL POOL CRUSTACEANS

According to the Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon (vernal pool recovery plan)[1], California linderiella, midvalley fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp use the same habitat types, though California linderiella tends to prefer deeper pools. The shrimp feed on algae, bacteria, protozoa, rotifers and bits of detritus. The females carry their eggs in a ventral brood sac until they are dropped to the bottom of the pool, or the mother dies and sinks. At the end of the rainy season, as the pool dries up, the eggs remain in a dormant stage in the dried pool until the rains of the next season, or other environmental stimuli cause them to hatch. Cysts will hatch when the pool refills, although not all cysts present will hatch during the following rainy season, and they may remain dormant in the soil for multiple seasons.

According to the Biological Assessment, the wetland features on the project site do not have characteristic vegetation to classify them as vernal pools. Since vernal pool crustaceans are dependent on vernal pools, these species are not present on the project site. The proposed grading would not remove vernal pools; therefore, there are ***no impacts*** to vernal pool crustaceans.

RARE PLANTS

A variety of plant species are adapted to the hydrologic and soil conditions present in vernal pools, and generally do not occur elsewhere. Vernal pool habitats have dramatically declined in California, and as a result many of the plant species associated with the habitat have likewise declined. Vernal pool-associated special-status plant species found in Sacramento County are: Ahart's dwarf rush, Boggs Lake hedge-hyssop, dwarf downingia, legenere, pincushion navarretia, Sacramento Orcutt grass, and slender Orcutt grass.

[1] United States Fish and Wildlife Service, "Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon", December 2005.

Sanford's arrowhead 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.

As noted in the Biological Assessment, pedestrian surveys were conducted during the blooming period of these plants and would have been readily identifiable. No rare plants were observed in the onsite wetland swale or drainage ditch and neither feature has characteristics that classify it as a vernal pool. The proposed grading would not remove rare plants; therefore, there are ***no impacts*** to rare plants.

AQUATIC RESOURCES (WATERS AND WETLANDS)

The applicant provided a Draft Aquatic Resources Delineation Report prepared by Soar Environmental Consulting (Soar) (Appendix C). Based on the survey performed on June 10 and June 12, 2022, the report identified aquatic resources in the Project area that potentially qualify as waters of the U.S. and/or waters of the State. Waters of the U.S. on the site are subject to regulatory jurisdiction by both the USACE and the Central Valley Regional Water Quality Control Board (CVRWQCB). Waters of the State on the site are subject to the jurisdiction of the CVRWQCB and potentially the California Department of Fish and Wildlife (CDFW). Pursuant to these policies, any wetlands to be excavated or filled require 1:1 mitigation, and construction within the wetlands cannot take place until the appropriate permit(s) have been obtained from the Army Corps, the U.S. Fish and Wildlife Service (USFWS), the Regional Water Board, the California Department of Fish and Wildlife and any other agencies with authority over surface waters. Any loss of delineated wetlands not mitigated for through the permitting process must be mitigated, pursuant to County policy. Appropriate mitigation may include establishment of a conservation easement over wetlands, purchase of mitigation banking credits, or similar measures.

DELINEATION FINDINGS

On June 10 and June 12, Soar Environmental Consulting Inc. biologist, Danielle Aparicio, conducted the field site visit to delineate all potential wetlands. The findings of each parameter (hydrophytic vegetation, wetland hydrology, and hydric soils) and corresponding indicators are evaluated and described in this report. The findings and conclusions presented in this report, including the location and extent of waters subject to regulatory jurisdiction, represent the professional opinion of the consultant biologist. The results presented in the report are considered preliminary unless and until concurrence is received from the USACE, CVRWQCB, and CDFW.

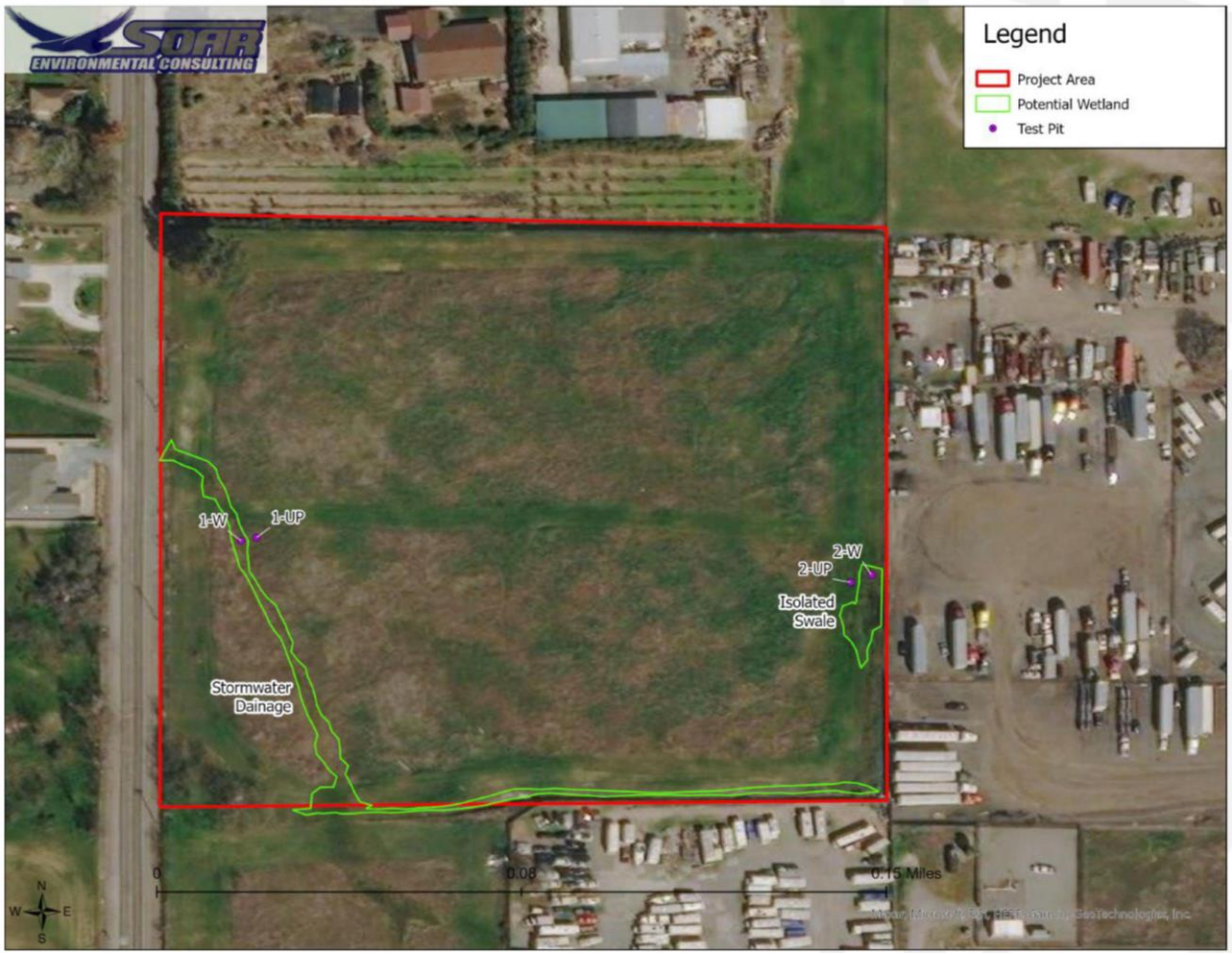
A subject area is determined to be a wetland if all three required parameters (hydrophytic vegetation, wetland hydrology, hydric soils) are present. At a minimum, one positive indicator for each parameter must be found in order to make a positive wetland determination. Two potential jurisdictional wetlands, 0.27-acres total, were evaluated and

delineated on site. Reference Table IS-4 summaries the aquatic resources present on the project site and Plate IS-5 shows the location of the resources.

Table IS-4: Delineated Wetlands

Wetland Feature	Acreage	Linear Feet
Drainage Swale	0.21	964
Isolated Wetland Swale	0.06	116

Plate IS-5: Aquatic Resources Delineation



During the survey, all three parameters were present within the isolated swale and the stormwater drainage. The water source of the isolated swale is not clear but is thought to come from the adjacent property stormwater run-off and accumulated in the swale within the project boundary. The water source of the stormwater drainage comes from the stormwater drainage pipe located on the southeast corner of the project site. The stormwater drainage flows along the southern ditch from east the west, then from south to northwest and into the roadside ditch that has a culvert connecting under 28th Street to the residential property on the west side of the street.

PROJECT IMPACTS

The proposed project will alter the onsite drainage swale and fill in the isolated swale. The drainage swale will be realigned and constructed with a three-foot bottom with 2:1 side slopes, resulting in a swale top width of approximately 12 feet. The realigned swale will follow along the south property line and then continue north along the west property line to the existing culvert which crosses 28th Street. The realigned drainage swale will be approximately 1,470 linear feet with an approximate acreage of 0.24 acres[2].

As stated above, any wetlands to be excavated or filled require 1:1 mitigation, and construction within the wetlands cannot take place until the appropriate permit(s) have been obtained. The proposed realignment will replace 100 percent of the existing wetlands and therefore would be in compliance with County General Plan Policy CO-58. Mitigation is included to ensure compensation for direct impacts to onsite surface waters consistent with County Policy. Impacts to wetlands and waters are ***less than significant with mitigation***.

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

[2] The acreage is estimated using an average ordinary high water mark of seven feet (half way between the drainage bottom, 3-feet and top, 12-feet) from bank to bank.

Planning and Design Division. The list includes more than eight trees, so is not included here, but it is available at http://www.planning.saccounty.gov/ 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).

NON-NATIVE TREE CANOPY PROJECT IMPACTS

The project site contains a clump of tree of heaven (*Ailanthus altissima*), an invasive species, in the southwest corner and two eucalyptus trees in the northwest corner. The project will require the removal of the eucalyptus trees and approximately eight tree of heavens. The project site is also within the North Highlands community which is an environmental justice community. Pursuant to General Plan Policy CO-145 and EJ-25, the removal of non-native canopy for development needs to be replaced at 125 percent. Using ArcGIS software and 2022 aerial photos, the canopy acreage for the eucalyptus and tree of heaven were calculated. The total square feet of canopy removed would be 2,555. Typically, new development is required to install landscaping which can incorporate some or all of the required replacement trees. However, since this is a grading permit only, and there is no landscaping plan associated with this request, mitigation requiring the replacement of 3,194 square feet (125 percent x 2,555 square feet) of non-native tree canopy is recommended. With recommended mitigation, impacts to non-native tree canopy is ***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.

GREENHOUSE GAS EMISSIONS 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.

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

[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.

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 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. The CAP was brought to the Board of Supervisors (BOS) as a workshop item on March 23, 2022. The CAP was revised based upon input received from the BOS and a final CAP was brought back before the BOS for approval, on September 27, 2022, but was continued to a future hearing date.

Greenhouse Gas Emissions 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-5. 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-5.

Table IS-5: 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

GREENHOUSE GAS EMISSIONS 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 during the grading and paving stages. Therefore to determine the potential CO_2e construction emissions the CalEEMod model was run using no mitigation measures. The construction

emissions associated with the project are calculated to be 42 MT of CO_2e per year, which is less than 1,100 MT of CO_2e per year construction threshold. Therefore, construction-related GHG impacts are considered ***less than significant***.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

The proposed project is the grading of land. As such, there are no operational uses associated with the proposed project. The proposed project ***will not impact*** operational-related GHG emissions.

ENVIRONMENTAL MITIGATION MEASURES

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

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

Applicant _____ 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: SWAINSON'S HAWK NESTING HABITAT

If construction, grading, or project-related improvements are to commence between March 1 and September 15, a focused survey for Swainson's hawk nests on the site and within ¼ mile of the site shall be conducted by a qualified biologist no later than 30 days prior to the start of construction work (including clearing and grubbing). If active nests are found, the California Fish and Wildlife shall be contacted to determine appropriate protective measures, and these measures shall be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, no further mitigation will be required.

MITIGATION MEASURE C: WETLAND COMPENSATION

To compensate for the permanent loss of wetlands, the applicant shall perform one or a combination of the following prior to issuance of grading permit, and shall also obtain all applicable permits from the Army Corps of Engineers, the U.S. Fish and Wildlife Service, the Central Valley Regional Water Quality Control Board, and the California Department of Fish and Wildlife:

A. Where a Section 404 Permit has been issued by the Army Corps of Engineers, or an application has been made to obtain a Section 404 Permit, the Mitigation and Management Plan required by that permit or proposed to satisfy the requirements of the Corps for granting a permit may be submitted for purposes of achieving a

no net-loss of wetlands. The required Plan shall be submitted to the Sacramento County Environmental Coordinator, U.S. Army Corps of Engineers, and U.S. Fish and Wildlife Service for approval prior to its implementation.

B. If regulatory permitting processes result in less than a 1:1 compensation ratio for loss of wetlands, the Project applicant shall demonstrate that the wetlands which went unmitigated/uncompensated as a result of permitting have been mitigated through other means. Acceptable methods include: reconstruction of wetland swales on the project site, payment into a mitigation bank, or protection of off-site wetlands through the establishment of a permanent conservation easement, subject to the approval of the Environmental Coordinator.

MITIGATION MEASURE D: NON-NATIVE TREE CANOPY REPLACEMENT

Removal of 3,194 square feet (2,555 square feet x 125%) of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species. Preference is given to on-site mitigation.

MITIGATION MEASURE E: UNANTICIPATED CULTURAL RESOURCE DISCOVERY

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

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

2. **Unanticipated cultural resources**. In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the

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

a. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.

b. If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

MITIGATION MEASURE 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 Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is $2,500. This fee includes administrative costs of $1050.00.

2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

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

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

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. **LAND USE** - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, North Highlands Community Plan and Sacramento County Zoning Code.
b. Physically disrupt or divide an established community?			X		The project will not create physical barriers that substantially limit movement within or through the community.
2. **POPULATION/HOUSING -** Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The project will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations.
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..
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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		The project consists of grading of the subject parcel. Construction will not substantially degrade the visual character or quality of the project site.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		Lighting would consist of security lighting that would not be directed off site. 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 is located within the safety zone of McClellan Airport. Refer to the Airports discussion in the Environmental Effects section above.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?			X		The project is located in the vicinity of McClellan Airport and is within the 65 dB noise contour. Refer to the Airports discussion in the Environmental Effects section above.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				X	The project does not affect navigable airspace.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X	The project does not involve or affect air traffic movement.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
6. **PUBLIC SERVICES -** Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The project will not result in increased demand for water supply.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		The project will not require wastewater services.
c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X		The Kiefer Landfill has capacity to accommodate solid waste until the year 2050.
d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?			X		The project will not require construction or expansion of new water supply, wastewater treatment, or wastewater disposal facilities.
e. Result in substantial adverse physical impacts associated with the provision of stormwater drainage facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
h. Result in substantial adverse physical impacts associated with the provision of public school services?				X	The project will not require the use of public school services.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?				X	The project will not require park and recreation services.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?				X	The proposed project is to grade approximately 10 acres for future industrial uses. A Traffic Impact Study is not required for the grading activity. The project will not result in individual or cumulative traffic impacts.
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?			X		The project will not generate objectionable odors.
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 proposed project would result in construction noise that may result in a temporary increase in ambient noise. However, this would not be a significant impact due to compliance with the County of Sacramento's Noise Ordinance (Chapter 6.68 of the County Code). The completed project will not generate substantial noise. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will not rely on groundwater supplies and will not substantially interfere with groundwater recharge.

	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		Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area.
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 not located in an area subject to 200-year urban levels of flood protection (ULOP).
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. **GEOLOGY AND SOILS** - Would the project:					

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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.
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?			X		The project is not located on an unstable geologic or soil unit.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		A public sewer system is available to serve the project.
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:					

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?		X			No special status species are known to exist on or utilize the project site; however the project site does contain suitable habitat for nesting Swainson's hawk. 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		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site.
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			There are a total of 0.27 acres of delineated wetlands on the project site. Project impacts will result in permanent and temporary loss of protected wetlands. Mitigation is included to require no net-loss. Refer to the Biological Resources discussion in the Environmental Effects section above.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected.
e. Adversely affect or result in the removal of native or landmark trees?			X		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 will remove 2,555 square feet of non-native tree canopy. Mitigation is included to require in-kind replacement tree canopy. Refer to the Biological Resources discussion in the Environmental Effects section above.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?				X	There are no known conflicts with any approved plan for the conservation of habitat.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project.
b. Have a substantial adverse effect on an archaeological resource?			X		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 February 11, 2022 for the project area and a one-quarter-mile buffer. The records search identified no previously recorded resources within the project site. A Phase I Cultural Resource Assessment Report was prepared for the project by Soar Environmental Consulting. The archaeologist walked parallel transects of three to five meter separation. The field survey found no indications of either historic or archeological resources being present. Nevertheless, unanticipated subsurface discoveries are possible and mitigation is recommended to ensure proper treatment if cultural resources are discovered. Project impacts to cultural resources will be less than significant.
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 on September 20, 2022. Request for formal consultation was not received. Tribal cultural resources have not identified in the project area; however, unanticipated subsurface discoveries are possible and mitigation is recommended to ensure proper treatment if Tribal Cultural Resources are discovered. Project impacts to tribal cultural resources will be less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
15. **HAZARDS AND HAZARDOUS MATERIALS** - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X	The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?				X	The project does not involve the transport, use, and/or disposal of hazardous material.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X	The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?				X	The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		Project involves the grading of land. Grading will not involve methods that are wasteful, inefficient or unnecessary consumption of energy resources. Project impacts are less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X	The project involves the grading of land and will not obstruct a state or local plan for renewable energy or energy efficiency.
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 California Emissions Estimator Model (CalEEMod) was used to estimate the greenhouse gas emissions associated with the project. Based on the results, the established County threshold of 1,100 annual metric tons of CO2e for construction will not be exceeded. Impacts are less than significant. See the GHG discussion in the Environmental Effects section 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	Intensive Industrial	X		
Community Plan	M-1	X		
Land Use Zone	M-1	X		

INITIAL STUDY PREPARERS

Environmental Coordinator: Joelle Inman

Senior Environmental Analyst: Julie Newton

Associate Environmental Analyst: Kurtis Steinert

Office Manager: Belinda Wekesa-Batts

Administrative Support: Justin Maulit