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 Mitigated Negative Declaration re: The Project described as follows:

Control Number: PLNP2020-00195

Title and Short Description of Project: 6840 2nd Street Parcel Map

The project consists of the following planning entitlement requests:

1. A Tentative Parcel Map to divide one approximately 9.99-acre parcel in the AR-2 zone into four parcels and one remainder parcel with the following sizes:
    - Proposed Parcel 1: about 2 gross acres (about 1.85 net acres)
    - Proposed Parcel 2: about 2 acres (gross/net)
    - Proposed Parcel 3: about 1.99 acres (gross/net)
    - Proposed Parcel 4: about 2 acres (gross/net)
    - Remainder Parcel: about 2 gross acres (about 1.85 net acres)
1. A Special Development Permit to allow the project to deviate from the following development standard:
    - Minimum Lot Size in the AR-2 Zone (Zoning Code Section 5.3.1.A., Table 5.4): Two gross acres. As proposed, one of the parcels is ~1.99 gross acres.
2. A Design Review to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines).

No residences are currently proposed; the applicant has indicated the building envelops for future development. The impact analysis in this document assumes that the parcels will be developed. In addition to the residences being developed the proposed construction of the drive will require street improvements along 2nd Street as well as development of a Class C intersection between 2nd Street and the drive.

Assessor's Parcel Number: 206-0142-005-0000

Location of Project: The project site is located at 6840 2nd Street approximately 310 feet north of M Street in the community of Rio Linda.

Project Applicant: Chuck Rose

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.

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.

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

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

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2020-00195

NAME: 6840 2nd Street Parcel Map

LOCATION: The project site is located at 6840 2nd Street approximately 310 feet north of M Street in the community of Rio Linda.

ASSESSOR'S PARCEL NUMBER: 206-0142-005-0000

APPLICANT/OWNER: Chuck Rose
5550 Madison Avenue #F
Sacramento, CA 95841

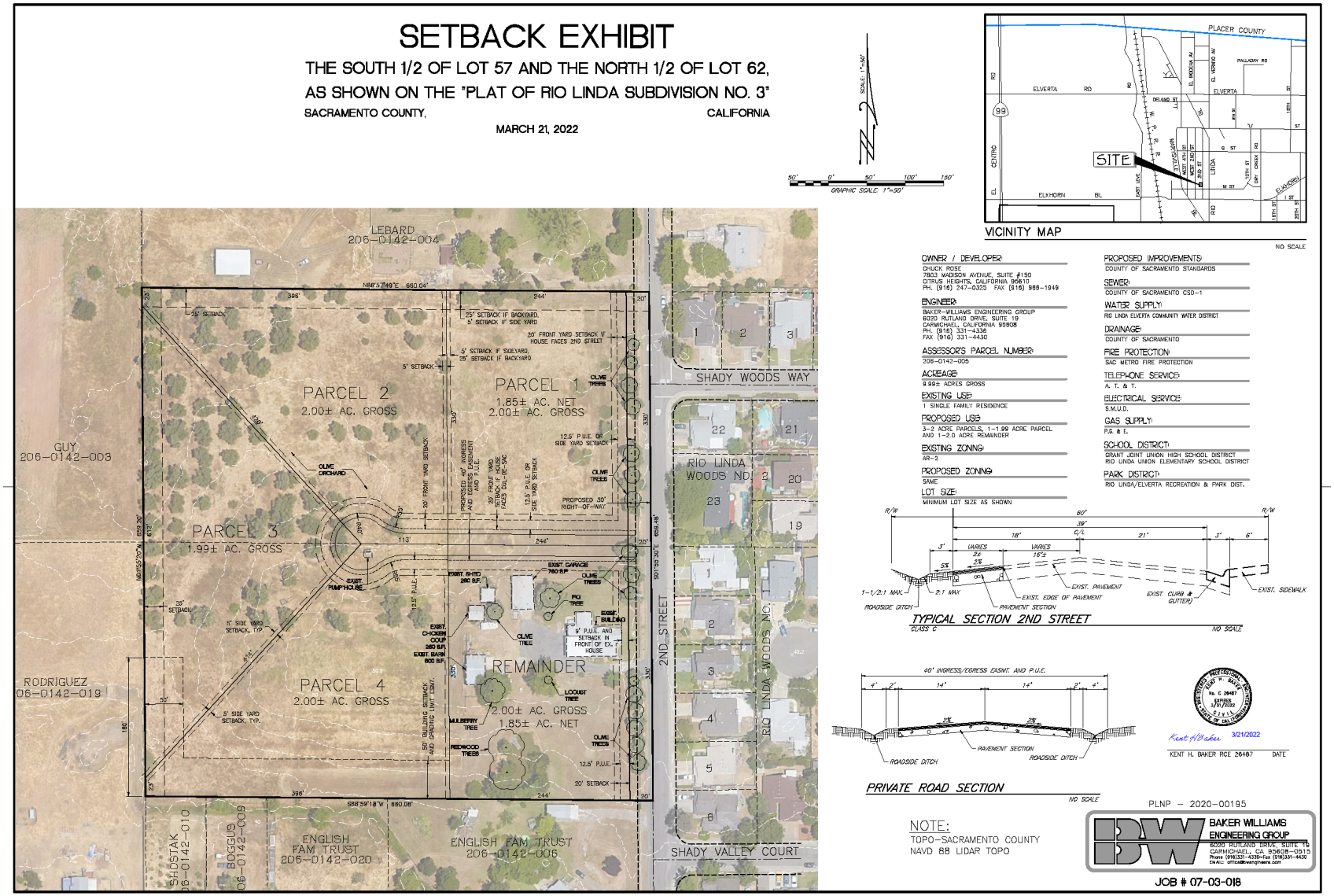
Engineer: Baker Williams Engineering Group
6020 Rutland Drive #19
Carmichael, CA 95608
Contact: Kent Baker

PROJECT DESCRIPTION

The project consists of the following planning entitlement requests:

1. A **Tentative Parcel Map** to divide one approximately 9.99-acre parcel in the AR-2 zone into four parcels and one remainder parcel (Plate IS-1) with the following sizes:
    - Proposed Parcel 1: ~2 gross acres (~1.85 net acres)
    - Proposed Parcel 2: ~2 acres (gross/net)
    - Proposed Parcel 3: ~1.99 acres (gross/net)
    - Proposed Parcel 4: ~2 acres (gross/net)
    - Remainder Parcel: ~2 gross acres (~1.85 net acres)

Plate IS-1: Tentative Map



2. A **Special Development Permit** to allow the project to deviate from the following development standard:
    - Minimum Lot Size in the AR-2 Zone (Zoning Code Section 5.3.1.A., Table 5.4): Two gross acres. As proposed, one of the parcels is ~1.99 gross acres.
3. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

No specific residences are currently proposed, and the applicant has indicated the building envelops for future development. The impact analysis in this document assumes that the parcels will be developed. In addition to the residences being developed the proposed construction of the access drive will require street improvements along 2nd Street as well as development of a Class C intersection between 2nd Street and the access drive.

ENVIRONMENTAL SETTING

The project site is located within the Rio Linda/Elverta community of Sacramento County approximately 335 feet to the north of M Street, on 2nd Street (Plate IS-2). The project site is designated as Agricultural Residential in the County's General Plan and is zoned as AR-2 (Plate IS-3) and designated AR-2 in the Rio Linda/Elverta Community Plan. The site has a residence and out-building on the southeast corner of the property. To the north and northwest, there are olive trees, which are not actively cultivated. To the north, west and south of the property are large lots zoned AR-2 (two residences per acre) with single residences on each parcel. To the east the area is zoned RD-5 (five residences per acre) with single family homes on each of the smaller parcels. The remainder parcel contains an existing residence and other out buildings while the proposed parcels are currently vacant.

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.

Plate IS-2: Aerial Map

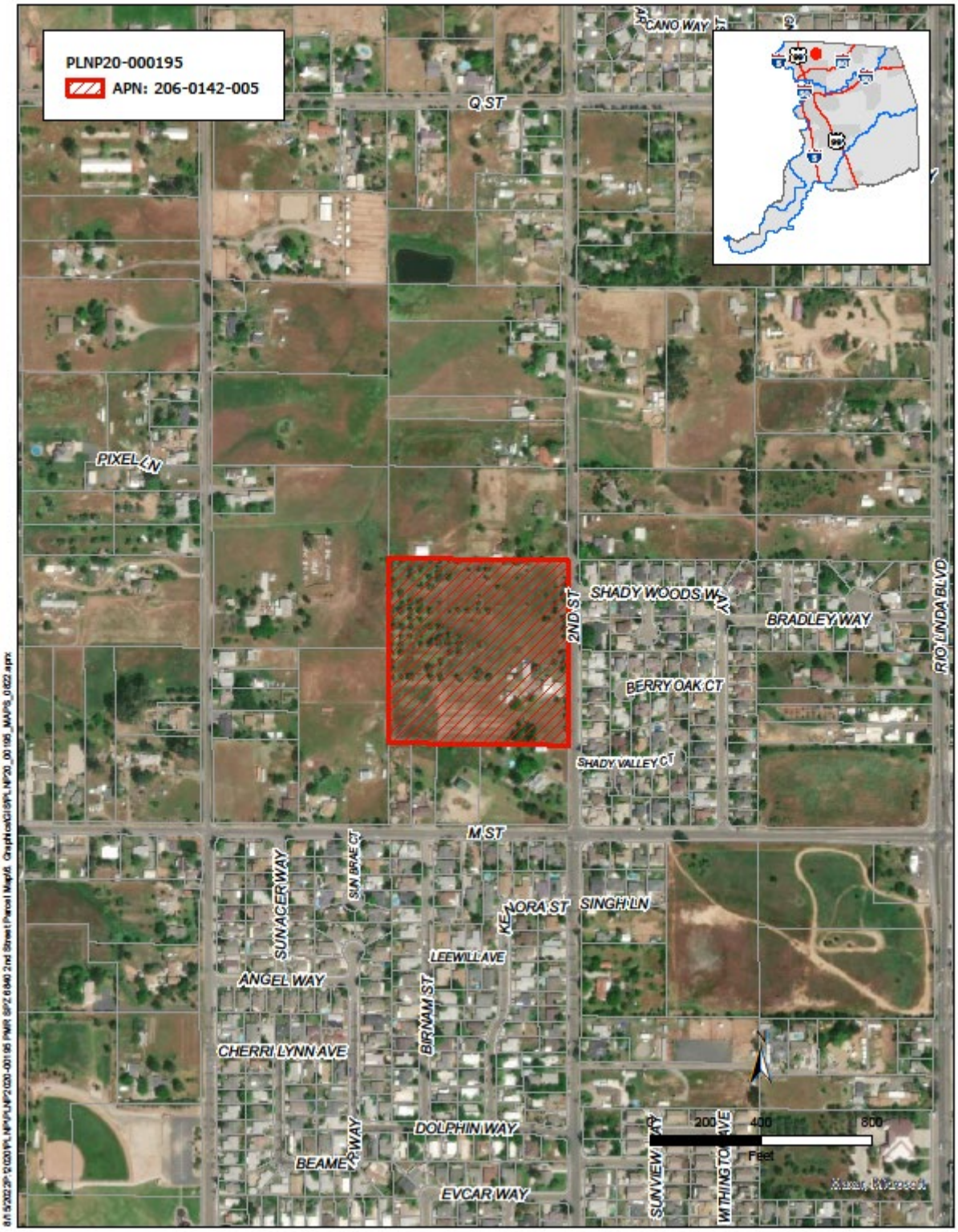
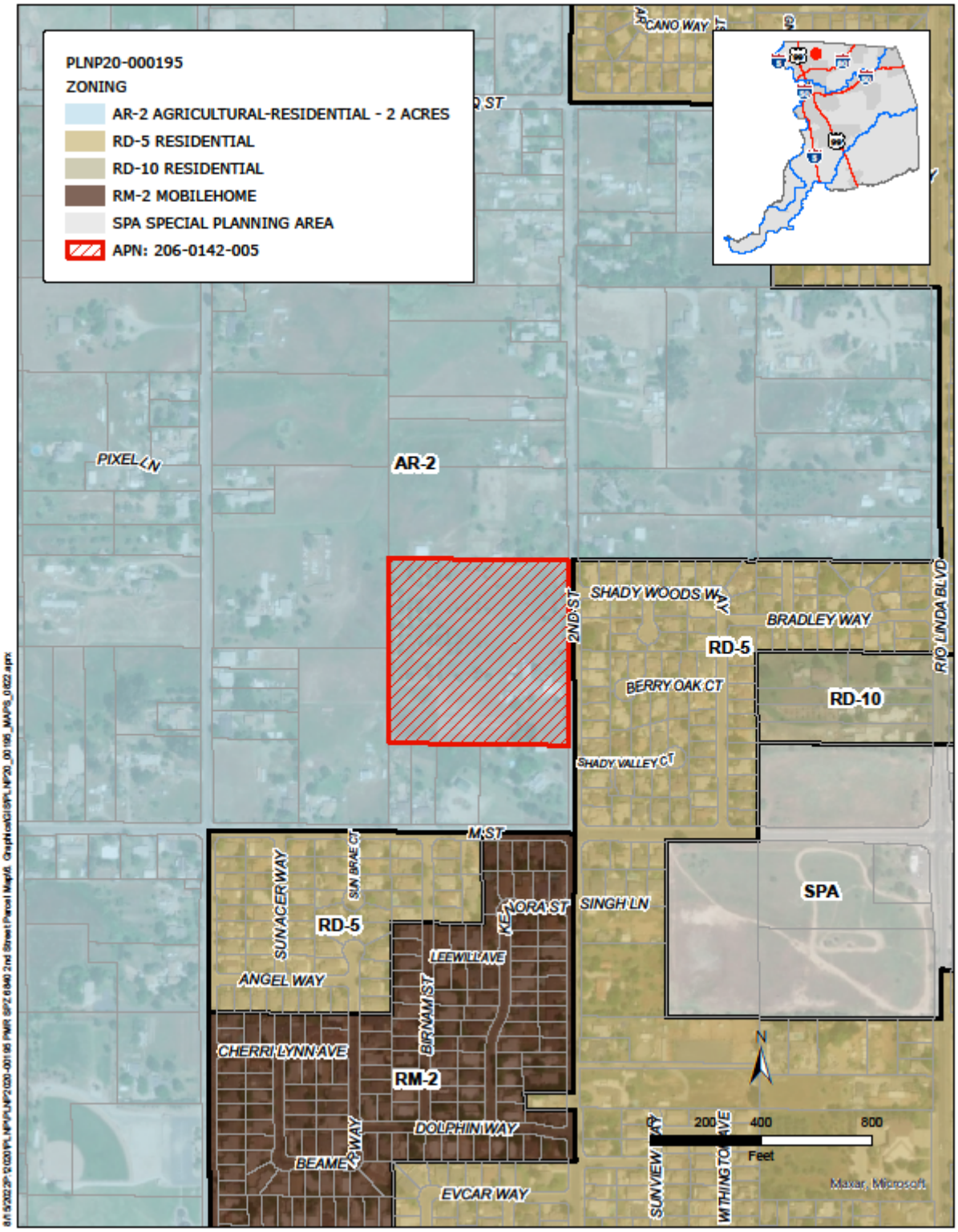


Plate IS-3: Zoning



LAND USE

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

- Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

The Rio Linda/Elverta Community Plan (RLECP) includes Public Facility policies that require either sewer and water, or preparation for sewer and water for all new development. These policies support efforts to protect groundwater from overdraft and contamination, two issues identified as potentially significant in the Rio Linda/Elverta area by both the community and the CEQA analysis during development of the Community Plan.

RLECP PUBLIC SERVICE POLICIES

The Rio Linda/Elverta Community Plan includes the following policies that pertain to the project:

PF-4 - All new development in urban zones must have public sewer. New development on lots of two acres or less in agricultural-residential zones must provide or make provisions for public sewer service.

PF-5 - All new development in urban zones must have public water. New development on lots of two acres or less in agricultural-residential zones must provide or make provisions for public water service.

For properties outside of the Urban Zones (i.e., those properties not within the 'Residential' zoning district (RD-1 through RD-40) must either connect to public water and sewer, or "make provisions for [sewer or water] service." To "make provisions for" sewer/water means that providing 'stub outs' (on-site piping and facilities designed to connect to public water and sewer when available) at time of development satisfies this consistency option.

PUBLIC WATER AND SEWER SITE SPECIFIC ANALYSIS

The project site is zoned AR-2, therefore the project is outside of the urban zone and must either connect to public water and sewer, or "make provisions for [sewer or water] service." According to County Assessor data, the subject parcel is 10 acres gross (435,600 square feet). Survey information included on the proposed parcel map indicates the subject parcel is 9.99 acres, with one of the proposed parcels measuring 1.99 gross acres. Because County records on file indicate that the parcel is 10 acres, and therefore 5 subsequent parcels would meet the 2 acre minimum for AR-2 lots, the ~435 square foot discrepancy in project area for the 1.99 acre lot is considered negligible.

There is an 8-inch water distribution line along 2nd Street. This line provides water service to the existing home on the project site and could be used by any future development of

the project. There is an existing public sewer line on 2nd Street, but SacSewer has indicated that this line is at capacity and no new tie-ins are permitted. Therefore, at this time, the project could supply stub outs for future connections, but would rely on septic service until such time that there is capacity in the sewer facilities on 2nd Street. Installation of septic systems would be subject to the approval by Sacramento County Environmental Management Department (EMD).

With the provision of sewer line utility stub-outs for sewer connections, and provision of water from the Rio Linda Water District, impacts to land use related to consistency with Community Plan policies 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

CRITERIA POLLUTANT HEALTH RISKS

All criteria air pollutants can have human health effects at certain concentrations. Air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS). The NAAQS and CAAQS are informed by a wide range of scientific evidence, which demonstrates that there are known safe concentrations of criteria air pollutants. Because the NAAQS and CAAQS are based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of these standards, the thresholds established by air districts are also protective of human health. Sacramento County is currently in nonattainment of the NAAQS and CAAQS for ozone. Projects that emit criteria air pollutants in exceedance of SMAQMD's thresholds would contribute to the regional degradation of air quality that could result in adverse human health impacts.

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

HEALTH EFFECTS SCREENING

In order to estimate the potential health risks that could result from the operational emissions of ROG, NOX, and PM2.5, PER staff implemented the procedures within SMAQMD's Instructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools (SMAQMD's Instructions). To date, SMAQMD has published three options for analyzing projects: small projects may use the Minor Project

Health Screening Tool, while larger projects may use the Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

Both the Minor Project Health Screening Tool and Strategic Area Project Health Screening Tool are based on the maximum thresholds of significance adopted within the five air district regions contemplated within SMAQMD's Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District (SMAQMD's Friant Guidance; October 2020). The air district thresholds considered in SMAQMD's Friant Guidance included thresholds from SMAQMD as well as the El Dorado County Air Quality Management District, the Feather River Air Quality Management District, the Placer County Air Pollution Control District, and the Yolo Solano Air Quality Management District. The highest allowable emission rates of NOX, ROG, PM10, and PM2.5 from the five air districts is 82 pounds per day (lbs/day) for all four pollutants. Thus, the Minor Project Health Screening Tool is intended for use by projects that would result in emissions at or below 82 lbs/day, while the Strategic Area Project Health Screening Tool is intended for use by projects that would result in emissions between two and eight times greater than 82 lbs/day. The Strategic Area Project Screening Model was prepared by SMAQMD for five locations throughout the Sacramento region for two scenarios: two times and eight times the threshold of significance level (2xTOS and 8xTOS). The corresponding emissions levels included in the model for 2xTOS were 164 lb/day for ROG and NOX, and 656 lb/day under the 8xTOS for ROG and NOX (SMAQMD 2020).

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

The model derives the estimated health risk associated with operation of the project based on increases in concentrations of ozone and PM2.5 that were estimated using a photochemical grid model (PGM). The concentration estimates of the PGM are then applied to the U.S. Environmental Protection Agency's Benefits Mapping and Analysis Program (BenMAP) to estimate the resulting health effects from concentration increases. PGMs and BenMAP were developed to assess air pollution and human health impacts over large areas and populations that far exceed the area of an average land use development project. These models were never designed to determine whether emissions generated by an individual development project would affect community health or the date an air basin would attain an ambient air quality standard. Rather, they are used to help inform regional planning strategies based on cumulative changes in emissions within an air basin or larger geography.

It must be cautioned that within the typical project-level scope of CEQA analyses, PGMs are unable to provide precise, spatially defined pollutant data at a local scale. In addition, as noted in SMAQMD's Friant Guidance, "BenMAP estimates potential health effects from a change in air pollutant concentrations, but does not fully account for other factors affecting health such as access to medical care, genetics, income levels, behavior choices such as diet and exercise, and underlying health conditions" (2020). Thus, the

modeling conducted for the health risk analysis is based on imprecise mapping and only takes into account one of the main public health determinants (i.e., environmental influences).

DISCUSSION OF PROJECT IMPACTS: CRITERIA POLLUTANT HEALTH RISKS

Since the project was below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Table IS-1 and Table IS-2.

Table IS-1: $PM_{2.5}$ Health Risk Estimates

$PM_{2.5}$ Health Endpoint	Age Range [1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5] (Mean)	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2] (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
Respiratory					
Emergency Room Visits, Asthma	0 - 99	1.2	1.1	0.0060%	18419
Hospital Admissions, Asthma	0 - 64	0.079	0.073	0.0040%	1846
Hospital Admissions, All Respiratory	65 - 99	0.32	0.27	0.0014%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.17	0.15	0.00063%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.00011	0.000098	0.0026%	4

Acute Myocardial Infarction, Nonfatal	25 - 44	0.0098	0.0092	0.0030%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.020	0.019	0.0026%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.033	0.031	0.0025%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.11	0.097	0.0019%	5052
Mortality					
Mortality, All Cause	30 - 99	2.1	1.9	0.0042%	44766

Notes:

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

Table IS-2: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range[1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5] (Mean)	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2] (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
Respiratory					

Hospital Admissions, All Respiratory	65 - 99	0.087	0.065	0.00033%	19644
Emergency Room Visits, Asthma	0 - 17	0.43	0.35	0.0060%	5859
Emergency Room Visits, Asthma	18 - 99	0.68	0.56	0.0045%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.054	0.043	0.00014%	30386

Notes:

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

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

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

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

HYDROLOGY AND WATER QUALITY

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

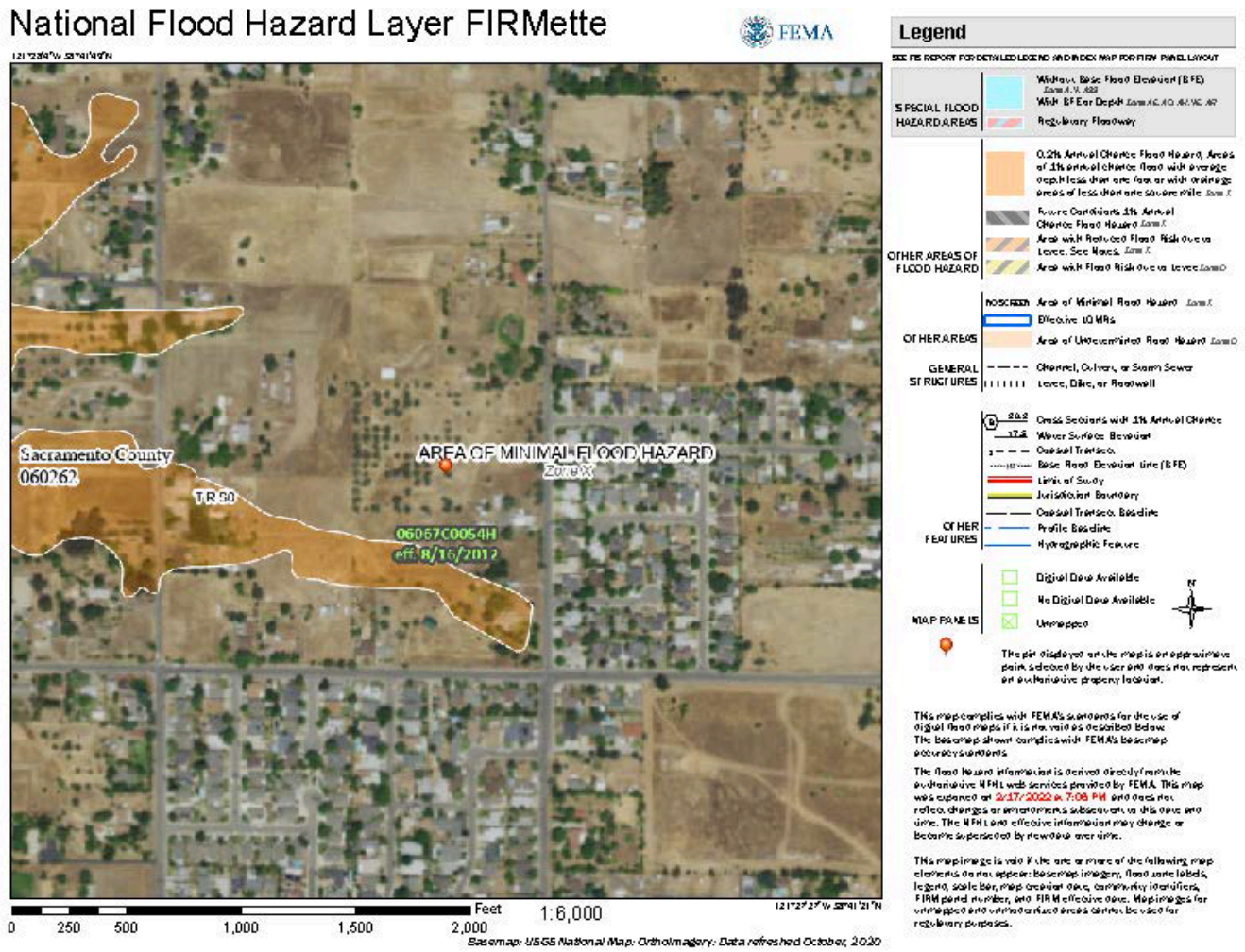
- Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.
- Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area.
- 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 two Federal Emergency Management Agency (FEMA) Flood Zone areas (Plate IS-4). Most of the site is within Zone X with the southwestern portion of the site are within Zone X-500 as determined by the 2012 FEMA Flood Insurance Rate Map, panel number 06067C0054H.

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. Flood Zone X-500 is defined as an "Area of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood." Per the drainage study prepared for the project (Appendix A), avoiding the area identified as flood zone during future development activities would result in impacts to drainage that are ***less than significant***.

Plate IS-4: FEMA Flood Map



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 the movement of any native resident or migratory fish or wildlife species.

- Adversely affect or result in the removal of native or landmark trees.

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.

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 removed.

BIOLOGICAL RESOURCES- IMPACTS AND ANALYSIS

SPECIAL STATUS SPECIES

Staff review of the project site, and search of the California Natural Diversity Database (CNDDB) species list was used to determine the potential habitats and species which could be impacted by the project. Some sensitive habitats, plants, and animals occur within the Rio Linda quadrangle. The CNDDB indicates documented occurrences of Boggs Lake hedge-hyssop, giant gartersnake, tricolor blackbird, Swainson's hawk, burrowing owl, bank swallow, white tailed kite, the specific quadrangles. However, the database does not indicate the presence of any of the above listed species within the project limits. The closest occurrences of the species listed above (i.e. Boggs Lake hedge-hyssop and burrowing owl) is approximately 4,600 feet northeast and 1 mile northwest of the project limits, respectively. The project site does not contain shallow water or vernal pool habitat to support Boggs Lake hedge-hyssop. Nor does the project site contain habitat for steelhead, giant gartersnake, tricolor blackbird, or bank swallow. The species that have the potential for occurrence on the project site are discussed in further detail below.

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.

NESTING HABITAT IMPACT METHODOLOGY

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, CDFW recommends utilizing the methodology set forth in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). The document recommends that surveys be conducted for the two survey periods immediately prior to the start of construction. The five survey periods are defined by the timing of migration, courtship, and nesting in a typical year (refer to Table IS-3). Surveys should extend a ½-mile radius around all project activities, and if active nesting is identified, CDFW should be contacted.

Table IS-3: Recommended Survey Periods for Swainson's Hawk (TAC 2000)

Period #	Timeframe	# of surveys required	Notes
I.	Jan. 1 – Mar. 20	1	Optional, but recommended
II.	Mar. 20 – Apr. 5	3	
III.	Apr. 5 – Apr. 20	3	
IV.	Apr. 21 – June 10	N/A	Initiating surveys is not recommended during this period
V.	June 10 – July 30	3	

For example, if a project is scheduled to begin on June 20, three surveys should be completed in Period III and three surveys in Period V, as surveys should not be initiated in Period IV. It is always recommended that surveys be completed in Periods II, III and V.

PROJECT IMPACTS

The project site is located 1.4 miles from the nearest recorded Swainson's hawk occurrence. The project site contains numerous mature trees that could provide adequate nesting habitat for Swainson's hawk. Therefore, preconstruction surveys for nesting hawks are necessary prior to construction. The purpose of the survey requirement is to ensure that construction activities do not agitate nesting hawks, potentially resulting in nest abandonment or other harm to nesting success. If Swainson's hawk nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting hawks remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. According to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in

California's Central Valley (Swainson's Hawk TAC 2000), the mitigation described above will ensure that impacts to nesting Swainson's hawk will be ***less than significant***.

FORAGING HABITAT IMPACT METHODOLOGY

Swainson's hawks are known to forage up to 18 miles from their nest site; however, that is the extreme range of one individual bird's daily movement. It is more common for a Swainson's hawk to forage within 10 miles of its nest site. Therefore, it is generally accepted and CDFW recommends evaluating projects for foraging habitat impacts when they are within 10 miles of a known nest site. Virtually all of Sacramento County is within 10 miles of a known nest.

Statewide, CDFW recommends implementing the measures set forth in the "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Buteo swainsoni) in the Central Valley of California" (November 1, 1994) for determining impacts to Swainson's hawk foraging habitat unless local jurisdictions develop an individualized methodology designed specifically for their location. Sacramento County has developed such a methodology and received confirmation from CDFW in May of 2006 that the methodology is a better fit for unincorporated Sacramento County and should replace the statewide, generalized methodology for determining impacts to foraging habitat.

Swainson's hawk foraging habitat value is greater in large expansive open space and agricultural areas than in areas which have been fragmented by agricultural-residential or urban development. The methodology for unincorporated Sacramento County is based on the concept that impacts to Swainson's hawk foraging habitat occur as properties develop to increasingly more intensive uses on smaller minimum parcel sizes. As part of methodology development, County and CDFW staff analyzed aerial photography of the County and compared this to the underlying zoning. It was determined that there was a strong correlation in most areas between the presence of suitable habitat and zoning for large agricultural parcels, and conversely that areas zoned for agricultural-residential or more dense uses tended to have fragmented or absent habitat. Therefore, the methodology relies mainly on the minimum parcel size allowed by zoning to determine habitat value. Though there may be individual properties which do not follow the observed regional trend, it was concluded that adherence to this methodology would result in adequate cumulative mitigation for the species.

For the purpose of the methodology, properties with zoning of AG-40 and larger are assumed to maintain 100% of their foraging habitat value and properties with AR-5 zoning and smaller are assumed to have lost all foraging habitat value. The project site is zoned AR-2 for the entire 9.99 acres. In accordance with the Sacramento County Zoning Code Section 2.5.2 Table 2.3 the AR-2 zone district is summarized as "Two (2) acres; same permitted uses as AR-10 (i.e., Allowing the keeping of animals and raising of crops for educational, recreational, or income purposes.) except hog farms are limited to three (3) adult hogs and feedlots are not allowed" Table IS-4 below illustrates this valuation and the continuum between AG-40 and AR-2 that represents the partial loss of habitat value that occurs with fragmentation of large agricultural land holdings. The large, 75% loss of habitat value between AG-20 and AR-2 is due to the change in land use from general agriculture to residential.

Table IS-4: Swainson's Hawk Foraging Habitat Value by Zoning Category

Zoning Category	Habitat Value Remaining
AG-40 and above (e.g. AR-80, AG-160 etc.)	100%
AG-20/UR	75%
AR-10	25%
AR-5 and smaller (e.g. AR-2, 1, or RD-5, 7, 10, 15, 20, etc.	0%

PROJECT IMPACTS - FORAGING HABITAT

Based on the site's existing AR-2 zoning, the land possesses 0% value as suitable foraging habitat. Therefore, no mitigation is required for the loss of foraging habitat. Project impacts to Swainson's hawk foraging habitat are ***less than significant***.

BURROWING OWL

Burrowing owl (*Athene cunicularia*) is not listed pursuant to either the California or federal Endangered Species Acts; however, it is designated as a species of special concern by the CDFW. They typically inhabit dry open rolling hills, grasslands, desert floors, and open bare ground with gullies and arroyos. This species typically uses burrows created by fossorial mammals, most notably the California ground squirrel, but may also use man-made structures such as culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement. The breeding season extends from February 1 through August 31.

The CNDDB records occurrences of burrowing owl within five miles of the project area with the closest situated approximately 1 mile to the northwest.

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.

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

The California Fish and Wildlife Staff Report on Burrowing Owl Mitigation indicates that the impact assessment should address the factors which could impact owls, the type and duration of disturbance, the timing and duration of the impact, and the significance of the impacts. The assessment should also take into account existing conditions, such as the visibility and likely sensitivity of the owls in question with respect to the disturbance area and any other environmental factors which may influence the degree to which an owl may be impacted (e.g. the availability of suitable habitat). The project area is a mixture of open land and olive trees, while the orchard area would be unlikely habitat for burrowing owls there are areas where the owls could forage and nest. As such, prior to the start of development, surveys would be necessary to determine whether the owls are present or not. With mitigation, the impacts to burring owls would be ***less than significant***.

NESTING BIRDS OF PREY

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

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

The project site contains numerous mature trees that could serve as suitable habitat for nesting raptors. If present, nesting raptors can be disturbed by construction equipment if appropriate measures are not taken. To avoid impacts to nesting raptors, mitigation involves pre-construction nesting surveys to identify any active nests and to implement

avoidance measures if nests are found – if construction will occur during the nesting season of March 1 to September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. Mitigation will ensure that impacts to nesting raptors will be ***less than significant***.

MIGRATORY BIRDS

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

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

NATIVE TREES

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

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

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

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

TREE INVENTORY

The applicant provided an Arborist Report prepared by California Tree and Landscape Consulting, Inc. (CalTLC) (Appendix B). The Arborist Report identified the species, size, and location of onsite and overhanging offsite trees. CalTLC inventoried and evaluated trees 4 inches or greater diameter at breast height (dbh) and all multi-trunk trees with an aggregate dbh of 10 inches or greater. A total of 23 trees were inventoried and evaluated. A portion of the project site was occupied by an old olive orchard and these trees were not included in the inventory. Of the 23 trees surveyed, 11 of the trees qualify as "protected trees" by the standards of the Sacramento County Tree Ordinance and Zoning Code (Table IS-5). All of the protected trees identified by the survey are located within the project area. All trees identified are shown on Plate IS-5.

Table IS-5: Tree Inventory of Protected Native Trees

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Onsite/Offsite Encroachment or impacts from Development	Mitigation
1654	Valley Oak	6	6	3	Retain		Within the setback of Parcel 1
1655	Valley Oak	4	4	3	Remove	Within the right-of-way of entrance drive	N/A because of size
1656	Valley Oak	17	20	3	Retain		Located on remainder Parcel
1657	Valley Oak	13	17	3	Retain		Located on remainder Parcel

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Onsite/Offsite Encroachment or impacts from Development	Mitigation
1658	Valley Oak	10	10	3	Retain		Located on remainder Parcel
1661	Valley Oak	7	17	3	Retain		Located on remainder Parcel
1663	Interior Live Oak	6	5	3	Retain		Located on remainder Parcel
1664	Valley Oak	6	10	3	Retain		Located on remainder Parcel
1666	Valley Oak	10	15	3	Retain		Located on remainder Parcel
1672	Valley Oak	10	15	3	Retain		Located on remainder Parcel
1675	California Black Walnut	20	25	3	Retain		Located on remainder Parcel

Plate IS-5: Tree Location

DISCUSSION OF PROJECT IMPACTS

ONSITE AND OFFSITE PROTECTED NATIVE TREES TO BE REMOVED

No development of the 4 parcels is currently proposed. However, as part of the tentative map an access drive is shown. Tree number 1655 is within the proposed right-of-way and will need to be removed. As shown on Table IS-6, this oak tree is 4 inch in diameter and does not qualify as a tree requiring mitigation. Tree 1654 is located within the setback for Parcel 1 and the remaining oak trees are located on the remainder lot (Plate IS-6) where no development is proposed now or in the future. Therefore, while one tree (number 1655) will need to be removed, future development would not remove any other oak or other native trees on the project site. Project impacts associated with the removal of protected native trees are ***less than significant***.

NON-NATIVE TREES

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

> CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.
>
> CO-146. If new tree canopy cannot be created 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.

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. The list includes more than seventy trees, so is not included here, but it is available at http://www.per.saccounty.net/Programs/Documents/Tree%20Coordinator/Tree%2015-year%20shade%20values%201-8-14.pdf#search=15%20year%20shade%20value.
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.

TREE INVENTORY

The Arborist Report identified the species, size, and location of onsite and overhanging offsite trees. Of the 23 trees, 11 of the trees are non-native and are not considered

"protected trees" by the standards of the Sacramento County Tree Ordinance and Zoning Code (Table IS-6). However, any non-native tree canopy removed would require mitigation. In addition to the 11 non-native trees inventoried the requirement that non-native tree canopy replacement would include any of the olive trees that would be removed during the development of the project. All trees identified as well as the olive orchard are shown on Plate IS-5.

Table IS-6: Tree Inventory of Non-Protected Trees

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Mitigation sq. ft.
1653	Ironwood	26	20	3	Retain	Within the setback of Parcel 1
1659	California Black Oak	5	6	3	Retain	Located on remainder Parcel
1662	Coastal Redwood	8	10	3	Retain	Located on remainder Parcel
1665	Coastal Redwood	10	10	3	Retain	Located on remainder Parcel
1667	Coastal Redwood	10	10	3	Retain	Located on remainder Parcel
1668	Coastal Redwood	12	10	3	Retain	Located on remainder Parcel
1669	Coastal Redwood	12	10	3	Retain	Located on remainder Parcel
1670	Coastal Redwood	10	10	3	Retain	Located on remainder Parcel
1671	Chinese Tallow Tree	4	6	3	Retain	Located on remainder Parcel
1673	White Mulberry	28	20	3	Retain	Located on remainder Parcel
1674	White Mulberry	11	20	2	Retain	Located on remainder Parcel

DISCUSSION OF PROJECT IMPACTS

As noted in Table IS-7 the 11 non-protected trees inventoried would not be removed due to future development because for being either within the setback area of a parcel or being located within the remainder parcel. The arborist did not inventory the olive trees that make up the old orchard. There are olive trees within the setback areas of the western and northern portions of the property that could be retained. Development outside of the setback areas could include building, pools and other hardscape as well as new landscape that would remove trees. Any future development would be required to replace tree canopy of those trees removed. A review of the canopies of the olive trees show an average canopy of 855.6 square feet per tree. Given that there are approximately 59 trees that could be removed upwards of 50,480.4 square feet of canopy would need to be replaced depending on the exact number of tree end up being removed. With the replacement of lost canopy project impacts to non-protected trees are expected to be ***less than significant***.

HAZARDS AND HAZARDOUS MATERIALS

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

- Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Expose the public or the environment to a substantial hazard through reasonably forseeable upset conditions involving the release of hazardous materials;

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

The GeoTracker program, which is a resource for identifying environmental data (including the location of leaking storage tanks, cleanup sites, disposal sites, monitoring wells, sites with hazardous waste permits and the status of such sites) for regulated facilities, is maintained by the State Water Resources Control Board. The program did not identify any open or closed hazardous waste cases within the proposed project limits. However, due to portions of the project site once being used as an orchard, a discussion of potential hazards and hazardous materials related to the use of pesticides from prior agricultural activities is included below.

PROJECT SETTING

Review of aerial photography of the project site indicates that the former orchard was in active production in the early 1900s through the 1930s By the mid-1950s, the agricultural buildings on site had been removed. Since then, a single family dwelling and associated accessory structures have been present on the site. The number of olive trees on site

has declined since production in the 1930s. It does not appear that new trees have been planted or that additional production has taken place in at least seventy years.

DISCUSSION OF PROJECT IMPACTS – HAZARDS AND HAZARDOUS MATERIALS

Organochlorine pesticides (OCPs) use in California indicates that sites with agricultural usage ending prior to 1950 do not need to be evaluated for OCPs, according to DTSC guidelines. Organochlorine pesticides were first introduced into California agriculture in 1944 and reached peak usage in the 1960's. OCPs are biopersistent and bioaccumulate in the environment. Most other classes of pesticides have relatively short half-lives and have not been found in agricultural fields. Because it is unclear at what point the olive orchard was no longer in production, protocols to assess for remnant OCPs are recommended out of an abundance of caution. Additionally, arsenic is also recommended for evaluation as a chemical of potential concern (COPC) since its use as arsenical pesticides and herbicides predates 1950.

Soil evaluations of the project site have not been conducted, but there is the potential that contamination could exist due to the use of pesticides/herbicides for olive production. To ensure the health and safety of construction workers and future residents of the site, mitigation has been included such that areas of disturbance shall be evaluated for potential contaminants of concern. The specific metrics for sampling are outlined in Mitigation Measure I below and are consistent with DTSC recommendations. In the event that contamination is uncovered that exceeds the screening thresholds of the DTSC, the mitigation outlines proper handling and disposal to protect construction worker safety from elevated levels of contamination. During construction, soils that are contaminated should be stockpiled for subsequent disposal characterization. With mitigation, project impacts from hazards and hazardous materials are ***less than significant***.

GREENHOUSE GAS EMISSIONS

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

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

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.[1]

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

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

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

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

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

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-1. 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-7.

Table IS-7: 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. The project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres (9.99 acres) and does not involve buildings more

than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply. The project meets the Sacramento Metropolitan Air Quality Management District's screening criteria for PM_{10} and $PM_{2.5}$ and Ozone precursors. Therefore, construction-related GHG impacts are considered ***less than significant***.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

No development is proposed at this time; however, when development is to occur the project will implement BPM 1 and BMP 2 in its entirety. As such, the project can be compared to the operational screening table, which serves as a guide for projects that have been determined to have operational emissions that are less than 1,100 MT of CO_2e per year. Mitigation has been included such that the project will implement BMP 1 and BMP 2. The impacts from GHG emissions are ***less than significant with mitigation***.

ENVIRONMENTAL MITIGATION MEASURES

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

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

Applicant **[Original Signature on File]**_____ Date: _____

MITIGATION MEASURE A: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

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

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.

- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.

- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.

- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

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

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic

MITIGATION MEASURE B: PROVISION OF PUBLIC WATER AND SEWER SERVICE

New development on vacant lots shall connect to public water and sewer, unless it is determined to be infeasible by SacSewer and the Rio Linda/Elverta Water District, respectively. If provision of either water or sewer service is not feasible, then stub-outs for water and/or sewer connections shall be installed during construction of all new houses so that new properties have the ability to connect to public services when available.

MITIGATION MEASURE C: SWAINSON'S HAWK NESTING HABITAT

If construction, grading, or project-related improvements are to commence between February 1 and September 15, focused surveys for Swainson's hawk nests shall be conducted by a qualified biologist within a ½-mile radius of project activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). To meet the

minimum level of protection for the species, surveys should be completed for the two survey periods immediately prior to commencement of construction activities in accordance with the 2000 TAC recommendations. If active nests are found, CDFW 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 D: BURROWING OWL

Prior to the commencement of construction activities (which includes clearing, grubbing, or grading) within 500 feet of suitable burrow habitat, a survey for burrowing owl shall be conducted by a qualified biologist. The survey shall occur within 30 days of the date that construction will encroach within 500 feet of suitable habitat. Surveys shall be conducted in accordance with the following:

1. A survey for-burrows and owls should be conducted by walking through suitable habitat over the entire project site and in areas within 150 meters (~500 feet) of the project impact zone.
2. Pedestrian survey transects should be spaced to allow 100 percent visual coverage of the ground surface. The distance between transect center lines should be no more than 30 meters (~100 feet), and should be reduced to account for differences in terrain, vegetation density, and ground surface visibility. To efficiently survey projects larger than 100 acres, it is recommended that two or more surveyors conduct concurrent surveys. Surveyors should maintain a minimum distance of 50 meters (~160 feet) from any owls or occupied burrows. It is important to minimize disturbance near occupied burrows during all seasons.
3. If no occupied burrows or burrowing owls are found in the survey area, a letter report documenting survey methods and findings shall be submitted to the Environmental Coordinator and no further mitigation is necessary.

4. If occupied burrows or burrowing owls are found, then a complete burrowing owl survey is required. This consists of a minimum of four site visits conducted on four separate days, which must also be consistent with the Survey Method, Weather Conditions, and Time of Day sections of Appendix D of the California Fish and Wildlife “Staff Report on Burrowing Owl Mitigation” (March 2012). Submit a survey report to the Environmental Coordinator which is consistent with the Survey Report section of Appendix D of the California Fish and Wildlife “Staff Report on Burrowing Owl Mitigation” (March 2012).

5. If occupied burrows or burrowing owls are found the applicant shall contact the Environmental Coordinator and consult with California Fish and Wildlife prior to construction, and will be required to submit a Burrowing Owl Mitigation Plan (subject to the approval of the Environmental Coordinator and in consultation with California Fish and Wildlife). This plan must document all proposed measures, including avoidance, minimization, exclusion, relocation, or other measures, and include a plan to monitor mitigation success. The California Fish and Wildlife “Staff

Report on Burrowing Owl Mitigation" (March 2012) should be used in the development of the mitigation plan.

MITIGATION MEASURE E: RAPTOR NEST PROTECTION

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

MITIGATION MEASURE F: MIGRATORY BIRD NEST PROTECTION

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

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and August 31, a survey for active migratory bird nests shall be conducted no more than 14 day prior to construction by a qualified biologist.

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

3. If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which has been determined by a qualified biologist, shall be established and maintained around the nest to prevent nest failure. All construction activities shall be avoided within this buffer area until a qualified biologist determines that nestlings have fledged, or until September 1.

MITIGATION MEASURE G: NON-NATIVE TREE CANOPY

Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species. Preference is given to on-site mitigation, but if this is infeasible, then funding shall be contributed to the Sacramento Tree Foundation's Greenprint program in an amount proportional to the tree canopy lost

(as determined by the 15-year shade cover calculations for the tree species to be planted through the funding, with the cost to be determined by the Sacramento County Tree Foundation).

MITIGATION MEASURE H: CULTURAL RESOURCES UNANTICIPATED 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 unexpected cultural resources discovered during project construction, work shall be halted until a qualified archaeologist may evaluate the resource encountered.

1. 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. 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 I: HAZARDOUS MATERIALS

Prior to construction, the project proponent shall determine the level of concentration of OPCs and arsenic present on the project site through sampling presented in a Phase II environmental site assessment (ESA). The ESA shall be prepared by a qualified geologist and submitted to Sacramento County PER and EMD for acceptance prior to approval of grading permits, improvement plans, or first building permit (whichever occurs first). The sampling shall evaluate areas of proposed disturbance in accordance with DTSC's 2008 Interim Guidance for Sampling Agricultural Properties (Third Revision). OCPs should be analyzed using U.S. EPA 8081A or equivalent. Metals must be analyzed using the U.S. EPA 6000/7000 series. Sample holding times should be consistent with U.S. EPA SW-846. Variances to holding times and effects on data results must be discussed in the data validation section of the report.

- Pesticide Analyses – For the 10 acre site, 20 boring samples shall be taken in accordance with recommendations in the DTSC 2008 Interim Guidance for Sampling Agricultural Properties. Surface samples, discrete or composite, must be analyzed for OCPs.
- Discrete Sampling for Arsenic - A minimum of four discrete on-site surface samples must be analyzed for arsenic. When samples are composited for OCP analysis, one discrete sample from each composite must be analyzed for arsenic. When more than four composite samples are analyzed for OCPs, the total number of discrete samples analyzed for arsenic does not need to be greater than the number of total composite samples used for OCP analysis.

If sampling indicates presence of OCPs or arsenic on the project site that is within the recommended screening thresholds of DTSC, then no further action is required. If sampling indicates that there are contaminants of concern beyond the screening thresholds, then then ESA shall outline steps for remediation including (but not limited to), worker safety protocols, stockpiling and disposal of any contaminated material at an approved landfill.

MITIGATION MEASURE J: GREENHOUSE GASES

The project is required to incorporate the following Tier 1 Best Management Practices (BMPs)

- BMP 1: No natural gas: Projects shall be designed and constructed without natural gas infrastructure.

- BMP 2: Electric vehicle ready: Projects shall meet the current CalGreen Tier 2 standards, except all EV Capable spaces shall instead by EV Ready.

- EV Capable requires the installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)

EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

MITIGATION MEASURE COMPLIANCE

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is $6,300.00. This fee includes administrative costs of $1039.00.

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		Based on the Planning Director's Determination and with the approval of the Special Development Permit, the project is consistent with environmental policies of the Sacramento County General Plan, Rio Linda 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 will result in some increases in density above existing designations, but is within an area designated for urban growth and uses.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?			X		The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?			X		The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X		The project does not involve or affect air traffic movement.
6. **PUBLIC SERVICES -** Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The water service provider has adequate capacity to serve the water needs of the proposed project.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		Septic systems would be required. Refer to the Public Services discussion in the Environmental Effects section above.
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 storm water drainage facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project would result in minor increases to student population; however, the increase would not require the construction/expansion of new unplanned school facilities. Established case law, *Goleta Union School District v. The Regents of the University of California* (36 Cal-App. 4th 1121, 1995), indicates that school overcrowding, standing alone, is not a change in the physical conditions, and cannot be treated as an impact on the environment.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will result in increased demand for park and recreation services, but meeting this demand will not result in any substantial physical impacts.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The proposed project is the division of a 9.9 acre parcel into 4 lots and a remainder. An existing house is on the remainder lot and 4 lots would be developed as residential. Development of the 4 lots would be characterized as a small project and would screen out as not generating significant VMT.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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. The project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres, and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply. The project meets the Sacramento Metropolitan Air Quality Management District's screening criteria for PM_{10} and $PM_{2.5}$ and Ozone precursors.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
9. **NOISE -** Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The project is not in the vicinity of any uses that generate substantial noise, nor will the completed project 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 incrementally add to groundwater consumption; however, the singular and cumulative impacts of the proposed project upon the groundwater decline in the project area are minor.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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 within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map (Flood Zone 500-X). The Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards require that the project be located outside or above the floodplain, and will ensure that impacts are less than significant. Refer to the Hydrology discussion in the Environmental Effects section above.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		Although the project is within a 100-year floodplain, compliance with the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
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		Sacramento County Code Chapters 6.28 and 6.32 provide rules and regulations for water wells and septic systems that are designed to protect water quality. The Environmental Health Division of the County Environmental Management Department has permit approval authority for any new water wells and septic systems on the site. Compliance with existing regulations will ensure that impacts are less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
11. **GEOLOGY AND SOILS** - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.
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		All septic systems must comply with the requirements of the County Environmental Management Department, Environmental Health Division, as set forth in Chapter 6.32 of the County Code. Compliance with County standards will ensure impacts are less than significant.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. **BIOLOGICAL RESOURCES** - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?		X			The project site contains suitable habitat for burrowing owl and 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		No protected surface waters are located on or adjacent to the project site.
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			Native and/or landmark trees occur on the project site and/or may be affected by on and/or off-site construction. Mitigation is included to ensure impacts are less than significant. Refer to the Biological Resources discussion in the Environmental Effects section above.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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.
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		While there is a structure that is older than 50 years it is being retained and not development is proposed on that portion of the property. Therefore, no historical resources would be affected by the proposed project.
b. Have a substantial adverse effect on an archaeological resource?			X		The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources.
c. Disturb any human remains, including those interred outside of formal cemeteries?		X			No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.
14. **TRIBAL CULTURAL RESOURCES -** Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was not received. Tribal cultural resources have not been identified in the project area.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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		While the project will introduce four new homes and increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are net resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X			The project will fully comply with the SMAQMD GHG Tier 1 BMPs. As such, the project screens out of further analysis and impacts are less than significant. See the GHG discussion above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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	AG-RES - Agricultural-Residential	X		
Community Plan	AR-2	X		
Land Use Zone	AR-2	X		

INITIAL STUDY PREPARERS

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