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:

1. Control Number: PLNP2021-00237

2. Title and Short Description of Project: Somers Hangar Expansion Project

The proposed project is a request to expand an existing airport hangar facility and associated uses on-site for private business and personal operations. The existing aircraft hangar is approximately 17,984 square feet with a 765± square foot office area and a 791± square foot vestibule area. The expansion will increase the aircraft hangar to approximately 30,537 square feet, increase the existing office area to approximately 7,783 square feet, and add a private garage valet parking area consisting of 16 indoor parking spaces. The total square footage will increase on-site from 21,223± gross square feet to 64,183± gross square feet.

The project consists of the following planning entitlement requests:

- 1. A **Design Review** for a 42,960 square foot addition to an existing 21,223 square foot aircraft hangar facility on approximately 2 acres in the McClellan Park Special Planning Area (SPA) zone.
- 2. A **Special Development Permit** to deviate from minimum front and side street setbacks, minimum frontage landscape planter depth, and minimum parking standards.
- 3. Assessor's Parcel Number: 215-0300-096-0000
- **4. Location of Project:** The project site is located at 5617 Price Avenue and 5806 Kelly Way, in the McClellan Business Park, at the northwest corner of the intersection of Price Avenue and James Way, in the North Highlands community of unincorporated Sacramento County.
- **5. Project Applicant:** SoMC, LLC 5241 Arnold Avenue McClellan, CA 95652 Attention: Kevin Webb
- **6.** Said project will not have a significant effect on the environment for the following reasons:
  - a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to

- drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
- b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
- c. It will not have impacts, which are individually limited, but cumulatively considerable.
- d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.
- 7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.
- **8.** The attached Initial Study has been prepared by the Sacramento County Office of Planning and Environmental Review in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Office of Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

Joelle Inman Joelle Inman

**Environmental Coordinator** 

County of Sacramento, State of California

# COUNTY OF SACRAMENTO PLANNING AND ENVIRONMENTAL REVIEW INITIAL STUDY

# **PROJECT INFORMATION**

CONTROL NUMBER: PLNP2021-00237

**NAME:** Somers Hangar Expansion Project

**LOCATION:** The project site is located at 5617 Price Avenue and 5806 Kelly Way, in the McClellan Business Park, at the northwest corner of the intersection of Price Avenue and James Way, in the North Highlands community of unincorporated Sacramento County.

**Assessor's Parcel Number (APN):** 215-0300-096-0000

#### **OWNER/APPLICANT:**

SoMC, LLC 5241 Arnold Avenue McClellan, CA 95652 Attention: Kevin Webb

## **PROJECT DESCRIPTION**

The proposed project is a request to expand an existing airport hangar facility and associated uses on-site for private business and personal operations. The existing aircraft hangar is approximately 17,984 square feet with a 765± square foot office area and a 791± square foot vestibule area. The expansion will increase the aircraft hangar to approximately 30,537 square feet, increase the existing office area to approximately 7,783 square feet, and add a private garage valet parking area consisting of 16 indoor parking spaces. The total square footage will increase on-site from 21,223± gross square feet to 64,183± gross square feet.

The project consists of the following planning entitlement requests:

- 1. A **Design Review** for a 42,960 square foot addition to an existing 21,223 square foot aircraft hangar facility on approximately 2 acres in the McClellan Park Special Planning Area (SPA) zone.
- A Special Development Permit to deviate from minimum front and side street setbacks, minimum frontage landscape planter depth, and minimum parking standards.

# **ENVIRONMENTAL SETTING**

The proposed project site is located within the McClellan Business Park in the northcentral portion of unincorporated Sacramento County (Plate IS-1). The proposed project site is located on the west side of Price Avenue and the north side of James Way. Existing access to the project site is provided from a driveway and parking lot area off Price Avenue. Overall, the proposed project site is fully developed with the existing aircraft facility and associated uses. The site is landscaped with lawn at the front, rear, and sides of the property. Street trees abut the southern side of the property along James Way and a non-native tree fronts the southern side of the property along Price Avenue. The existing aircraft hangar is used to store corporate and private aircraft.

The property is zoned in the McClellan Park SPA (Special Planning Area), and is specifically located in the Core Aviation/Industrial District of the SPA Subarea and the General Industrial Sub-District of the SPA Subzone (see Land Use discussion, below, for further information on this specific SPA Subdistrict.) Surrounding land uses consist of industrial, warehouse, and industrial park type uses. The McClellan Airport Airfield is located adjacent to the project site to the west. Low rise apartment housing is located approximately 270 feet to the east of the site across Price Avenue and Perrin Avenue (private). Zoning of all parcels in the immediate and surrounding area are also SPA. See Plate IS-2 and Plate IS-3 to review the project location and zoning maps. See Plate IS-4 for the Preliminary Site Plan exhibit of the proposed project site.

The existing aircraft hangar facility is used for the private corporate operations of SBM Building Management and for personal use by the property owner. Thus, the project is a private airport facility and will not be used by the general public. See Table IS-1 for a complete synopsis of the existing and proposed uses and square footages on-site. The existing aircraft hangar and associated offices will be expanded to a two-story facility. With the expansion, the total square footage will increase on-site from 21,223± gross square feet to 64,183± gross square feet, with the expansion adding approximately 42,960 gross square feet to the site (see **Table IS-1** and **Plate IS-3** for specific project information).

The existing parking lot area will also be expanded to accommodate employees and visitors of the proposed project with new landscaping. Site access will be provided by three (3) new asphalt driveway entrances on the west side of Price Avenue; two (2) fronting the main building entry area and one farther north that provides driveway access to the private garage valet parking area. Two aircraft hangar access driveways are proposed at the south side of the new aircraft hangar area addition on the westerly extension of James Way within the secure airfield/runway envelope. These two driveways provide access to the new aircraft hangar expansion area. According to the project applicant, with the expansion, approximately half of the aircraft will support their private business operations while the remaining aircraft will be used for personal uses. The overall volume of flights will remain approximately the same and on a typical day, no more than 2 to 3 employees will be on-site at any given time.

Table IS-1: Existing and Proposed Uses/Square Footages On-Site

Use	Existing	Proposed	
Aircraft Hangar	17,984± SF	30,537± SF	
Office Area	765± SF	7,783± SF	
Storage	764± SF	0 SF	
Private Garage Valet Parking Area (consisting of 16 indoor parking spaces)		4,515 SF	
Vestibule Area	791± SF		
Totals	20,304± SF (net)	42,835± SF	
	21,223 SF (gross)	42,960 SF (gross)	

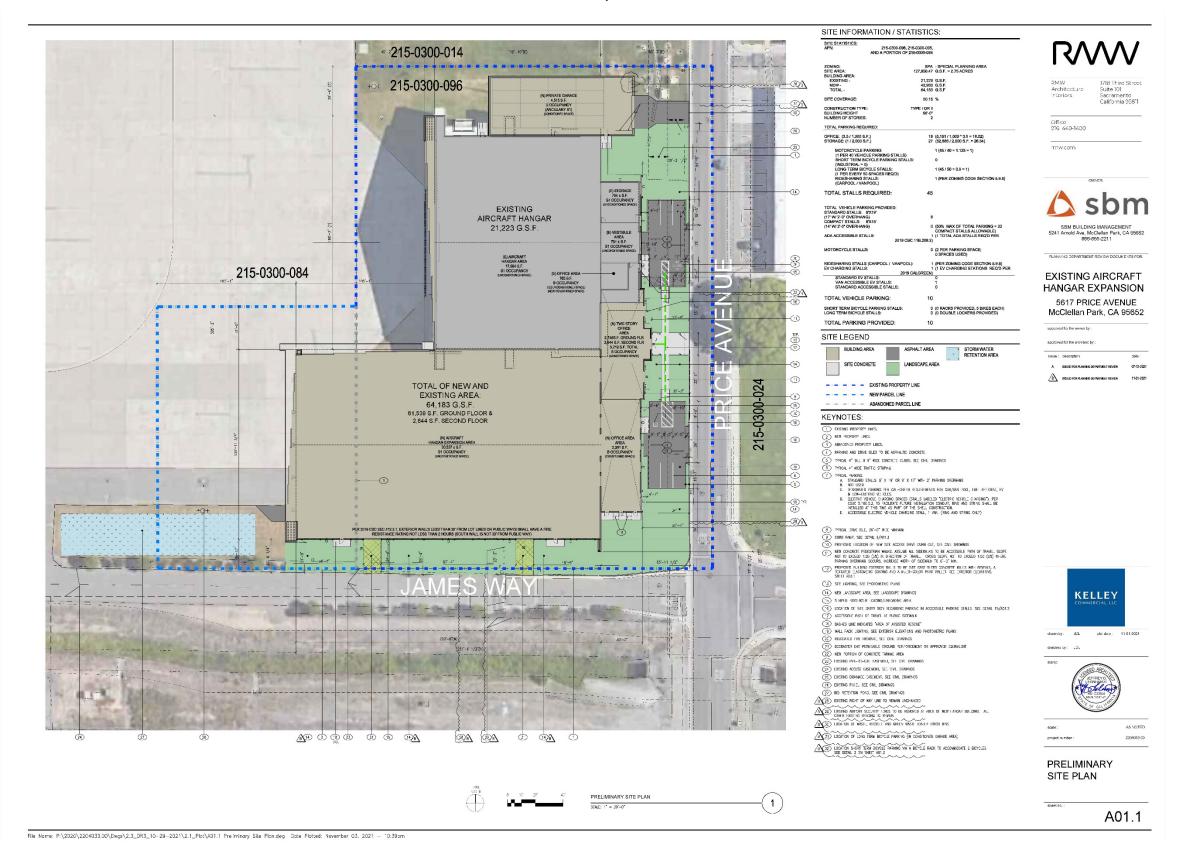
Plate IS-1: Vicinity Map



REDWOOD ST JAMES WAY PRICE AVE 125 250 500 Feet Project Parcel (APN:215-0300-096-0000) Esri, Maxar, Earthstar Geographics, and the GIS User Community

Plate IS-2: Existing Conditions at Project Site

Plate IS-3: Proposed Site Plan



# **ENVIRONMENTAL EFFECTS**

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

# **LAND USE**

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

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

#### GENERAL PLAN

The existing General Plan land use designation for the site is Intensive Industrial (INT IND). This land use designation allows for manufacturing and related activities including research, processing, warehousing, and supporting commercial uses, the intensive nature of which require urban services. Prescribed floor area ratios (FAR) for this land use designation range from 0.15 to 0.80; with the proposed project the FAR would be 0.43¹ and would remain compatible with the intent of this land use designation. Industrial Intensive areas are located within the urban portion of the County and receive an urban level of public infrastructure and services. The proposed uses of the site are consistent with the existing land use designation. Impacts in regards to consistency with the General Plan are *less than significant*.

#### **NORTH HIGHLANDS COMMUNITY PLAN**

The project site is located within the North Highlands community of unincorporated Sacramento County. The County Board of Supervisors adopted the North Highlands Community Plan (Community Plan) in November 1973. The Community Plan identifies goals and objectives related to land use, population, housing, transportation, noise, utilities and community facilities in order to guide development within the Community Plan area. The Community Plan land use designation for the site is Special Planning Area (SPA).

 $<sup>^{1}</sup>$  0.43 FAR = 64,183 square-foot gross floor area / 147,799 square feet of buildable land area for the proposed project.

SPAs can be established to tailor the Zoning Code to meet the specific needs of existing communities. They impose a "special" set of development standards for select areas that have unique qualities or problems that cannot be adequately addressed by the County's Zoning Code, such as historic areas or main streets, or for areas subject to unique environmental conditions, such as steep slopes or flooding. SPAs may require more stringent development standards than the Zoning Code, or may actually relax such standards, depending upon the nature of the area in question.

#### McClellan Park SPA & County Zoning Code

With the Department of Defense's (DOD) announcement of its intention to close McClellan Air Force Base in 1995, the County of Sacramento was designated as the Local Reuse Agency. The DOD and County worked jointly on several phased Base Reuse Plans. The land at the McClellan Park site was initially categorized into specific zoning classifications in the McClellan Technology Center SPA Zoning Ordinance, which was approved by the County in July 1997. Subsequent amendments were made as additional progress in the reuse planning effort were made. The McClellan Park SPA was created through approval of a Zoning Ordinance Amendment by the BOS in December 2006, as part of the McClellan AFB Draft Final Reuse Plan Project (County Control #00-0566). The amendment designated the prior High Technology Industrial Park District, Administrative District, and Residential District into four new districts (Core Aviation/Industrial District, West McClellan District, East McClellan District, and South McClellan District). The McClellan Park SPA was last amended in January 2019.

It was the intent of the County Board of Supervisors in adopting this Special Planning Area (SPA) to facilitate conversion of the former McClellan Air Force Base (AFB) from a military facility to a modern, attractive, and economically viable industrial business park with a core of aviation, industrial, and related uses. In so doing, this SPA is intended to:

- Provide for the efficient reuse of existing McClellan facilities and high quality redevelopment of underutilized land and facilities.
- Promote an orderly, balanced, and integrated land use pattern that optimizes existing McClellan assets, supports sustainable land utilization, and enhances local and regional character, identity, and quality of development.
- Define permitted uses, development standards, performance standards, and design guidelines that provide flexibility in recognition of the unique and evolving conditions at McClellan Park generally consistent with the planning direction provided in the McClellan AFB Final Reuse Plan and the McClellan AFB Implementation Plan.

# **CORE AVIATION/INDUSTRIAL DISTRICT**

The project site is located in the Core Aviation/Industrial District of the McClellan Park SPA. This district is intended to accommodate aviation, aviation industrial, heavy industrial, and light industrial uses. This district is composed of two subdistricts – the

Airfield Subdistrict and the General Industrial Subdistrict (reference Plate IS-4). The project site is located in the General Industrial Subdistrict land use designation.

#### GENERAL INDUSTRIAL SUBDISTRICT

This subdistrict adjoins the airfield and provides for a variety of permitted light and heavy industrial uses including, but not limited to, industrial, fabrication, manufacturing, assembly, and research and development. It is intended that this subdistrict include medium and large-scale industrial uses that support and complement other industrial activities at McClellan Park. All facilities and uses existing within this subdistrict as of September 17, 1996, and subsequent uses approved by the Sacramento County Office of Planning and Environmental Review as of July 2018, are permitted. Uses permitted in the subdistrict, are set forth in Table 1 include: Core Aviation/Industrial District Permitted Use, as well as any use permitted in M-1; Light Industrial; and M-2, Heavy Industrial Zoning districts as set forth in the Sacramento County Zoning Code, Chapter 3, Table 3.2.5.

## **DISCUSSION OF CONSISTENCY WITH SPA**

The proposed project consists of the expansion of an existing hangar for storage of aircraft as well as maintenance and repair, both of these uses are permitted uses within the General Industrial Subdistrict (refer to Table 1 of the SPA; Core Aviation/Industrial District Permitted Uses – Aviation and Aviation Industrial Uses).

The McClellan SPA restricts commercial office and administrative uses within the General Industrial Subdistrict to specific buildings within the SPA area, but has a note saying, "For all other buildings and parcels, the base zone applies." The existing hangar building (Building #1080) is not included in the SPA list for those uses. The base zones for the parcel are M-1 and M-2. In the M-1 and M-2 zoning districts, office uses are permitted as incidental uses, subject to a finding that the use does not exceed 25 percent of the gross floor area of structure(s) committed to the primary use. The proposed project would expand office use to approximately 7,783 square feet, which would be roughly 12.12% of the total gross floor area and is therefore, a permitted use per Section 3.7.7.A of the Zoning Code.

Proposed onsite parking is ancillary to the allowed Impacts in regards to consistency with the McClellan Park SPA are *less than significant*.

# **COUNTY ZONING CODE**

The project is requesting a **Special Development Permit** to deviate from the following development standards:

- Front Yard Setback (Section 5.6.2.A, Table 5.14): The standard for minimum front yard setback is 50 feet. The project as proposed provides a front yard setback of 26 feet.
- Side Street Yard Setback (Section 5.6.2.A, Table 5.14): The standard for minimum side street setback is 50 feet. The project as proposed provides a 12 foot setback.

• Parking (Section 5.9.2.C and D, Tables 5.21 and 5.22): Based on the parking ration standards of Tables 5.21 and 5.22, the required parking for the project totals 45 stalls. As proposed, the project provides a total of 41 stalls.

There are no significant physical changes to the environment due to the request for a special development permit. Although minor elements of the project are not consistent with development standards, they would be consistent with Zoning Code upon approval of the entitlement request for a special development permit.

Impacts in regards to consistency with the Sacramento County Zoning Code are *less than significant*.

REDWOOD ST **GENERAL** INDUSTRIAL SUB-DISTRICT WHERRY OFFICE PARK SUB-DISTRICT JAMES WAY AIRFIELD SUB-DISTRICT Project Parcel (APN:215-0300-096-0000) **SPA Subzone** AIRFIELD SUB-DISTRICT GENERAL INDUSTRIAL SUB-DISTRICT 125 250 500 Feet WHERRY OFFICE PARK SUB-DISTRICT ource: Esri, Maxar, Earthstar Geographics, and the GIS User Community

**Plate IS-4: SPA Sub-District Designations** 

## **AIRPORTS**

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

- Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip.
- Expose people residing or working in the project area to aircraft noise levels in access of applicable standards.

The subject project is located within the McClellan Airport Policy Planning Area. Land Use compatibility for the Airfield is guided by the McClellan Air Force Base (McClellan AFB) Comprehensive Land Use Plan (CLUP), a document prepared by the Airport Land Use Commission (ALUC). The McClellan CLUP was adopted in January 1987 and the current version was last amended in December 1992. The purpose of the CLUP is to establish land use compatibility guidelines for height, noise, and safety within Airport Policy Areas. The CLUP is intended to protect airport operations from encroachment by non-compatible land uses, as well as protect citizens on the ground from the impacts of excessive noise and aircraft accidents. Any project that requires an entitlement and that falls with an airport safety zone or noise contour will be subject to the land use policies outlined in the CLUP. Generally, no land uses except open space are allowed in Clear Zones, many uses are restricted in the Approach-Departure Zone, and most uses are allowed within the Overflight Zone.

The project site is located within the Overflight Safety Zone of the CLUP. All projects located within the McClellan Airport Planning Policy Area must comply with the CLUP. According to the CLUP's Land Use Compatibility Guidelines for Safety, offices, warehousing and storage, and parking facilities such as private garages are allowed uses in the Overflight Zone. The proposed project is an allowed use in the Overflight Zone and therefore, would not result in a safety hazard for people residing or working in the vicinity of the airport.

Impacts are less than significant.

General Plan Policy NO-2 of the Noise Element states,

Proposals for new development within Sacramento County which may be affected by aircraft noise shall be evaluated relative to Table 4: Land Use Compatibility for Aircraft Noise, except in the following case. Development proposals which may be affected by aircraft noise from Sacramento International Airport shall be evaluated relative to the Land Use Compatibility Plan prepared for Sacramento International Airport dated December 12, 2013, adopted herein by reference.

The SPA requires that before issuance of any building permit for all uses, the owner of the underlying property shall, as a condition of development approval, dedicate to Sacramento County an avigation easement acknowledging ongoing operations at the Sacramento McClellan Airport as prescribed in McClellan SPA 511-22 Performance

Standards, Section d(2). Such avigation easement shall grant to McClellan Business Park, as the airport owner/operator, the right to permit aircraft operations, which may generate noise and vibration affecting the property. Dedication of an avigation easement has been included in the project's conditions of approval by Sacramento County Department of Airports.

The project site is located between the 65-70 dB Community Noise Equivalent Level noise contours. The Land Use Compatibility for Airport Noise (Table 4 of the Noise Element) indicates that of the projects proposed uses (offices, warehousing and storage, and parking facilities) are allowed within the 65-70dB CNEL noise contours. The same uses are also consistent with the Land Use Compatibility Table for Airport Noise for the CLUP. None of the proposed uses will require additional noise mitigation. The project would not expose individuals to aircraft noise in excess of standards.

Impacts are *less than significant*.

# TRANSPORTATION/TRAFFIC

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

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

#### **VMT ANALYSIS**

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

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

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

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

SacDOT has developed screening criteria for development projects. The screening criteria for VMT thresholds of significance are summarized in Table IS-2.

**Table IS-2: Screening Criteria for CEQA Transportation Analysis** 

Туре	Screening Criteria				
Small Projects	Projects generating less than 237 average daily traffic (ADT)				
Local-Serving Retail <sup>1</sup>	<ul> <li>100,000 square feet of total gross floor area or less; <u>OR</u> if supported by a market study with a capture area of 3 miles or less; AND</li> <li>Local Serving: Project does not have regional-serving characteristics.</li> </ul>				
Local-Serving Public Facilities/Services	<ul> <li>Transit centers</li> <li>Day care center</li> <li>Public K-12 schools</li> <li>Neighborhood park (developed or undeveloped)</li> <li>Community center</li> <li>Post offices</li> <li>Police and fire facilities</li> <li>Branch libraries</li> <li>Government offices (primarily serving customers in-person)</li> <li>Utility, communications, and similar facilities</li> </ul>				
Projects Near Transit Stations	<ul> <li>High-Quality Transit: Located within ½ a mile of an existing major transit stop<sup>2</sup> or an existing stop along a high-quality transit corridor<sup>3</sup>; <u>AND</u></li> <li>Minimum Gross Floor Area Ratio (FAR) of 0.75 for office projects or components; <u>AND</u></li> <li>Parking: Provides no more than the minimum number of parking spaces required<sup>4</sup>; <u>AND</u></li> <li>Sustainable Communities Strategy (SCS): Project is not inconsistent with the adopted SCS; <u>AND</u></li> <li>Affordable Housing: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units; <u>AND</u></li> <li>Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.</li> </ul>				

# Restricted Affordable Residential Projects

- Affordability: Screening criteria only apply to the restricted affordable units; AND
- Restrictions: Units must be deed-restricted for a minimum of 55 years;
   AND
- Parking: Provides no more than the minimum number of parking spaces required4; AND
- Transit Access: Project has access to transit within a ½ mile walking distance; AND
- Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.

<sup>&</sup>lt;sup>1</sup> See Appendix A for land use types considered to be retail.

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

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

<sup>&</sup>lt;sup>4</sup> Sacramento County Zoning Code Chapter 5: Development Standards

# VMT: DISCUSSION OF IMPACTS

The Department of Transportation (DOT) reviewed the proposed project to determine whether the project would require a VMT analysis. The project is considered an expansion to an existing 21,223± aircraft hangar facility with a total proposed square footage of approximately 42,960± square feet for the expansion (see Table IS-2 for a complete synopsis of the existing and proposed uses and square footages on-site). According to the screening criteria listed in Table IS-2, the project screens out for VMT significance thresholds because it falls into the exclusion category of "small projects" due to producing less than 237 new daily trips. Thus, no further analysis is required.

DOT staff, Gary Gasperi, prepared a Trip Generation Table (Table IS-3) comparing the existing use to the proposed use. According to DOT Staff, the land use of an aircraft hangar was classified as rental storage for trip generation purposes. As shown in Table IS-3, the proposed project would result in 86 new daily trips. Although the existing aircraft hangar building's square footage will be increasing in size, the calculated change in overall new trips will not substantially increase. From the screening criteria listed in Table IS-2 because the project generates less than 237 new daily trips, a VMT analysis is not warranted. Further, the addition of 86 new daily trips does not result in a substantial increase in VMT and impacts to transportation/traffic are *less than significant*.

P.M. Peak **Daily Trip** Daily P.M. Peak **Zoning or Use** Condition Source **Hour Trip** (Area) Rate **Trips Trips** Rate Hangar **SDMC** 2 VTE/KSF 0.18 VTE/KSF Existing 42 4 Use LDC GFA GFA 21.22 KSF GFA Hangar **Proposed** 2 VTE/KSF SDMC 0.18 VTE/KSF 128 12 Use LDC GFA GFA 64.18 KSF GFA Increase in trips from Existing to Proposed Uses 86 8

**Table IS-3: Trip Generation Table** 

Notes: VTE = Vehicle Trip Ends KSF GFA = 1000 square foot gross floor area SDMC LDC = San Diegp Municipal Land Development Code Trip Generation Manual

# **AIR QUALITY**

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

 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-4). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-5).

**Table IS-4: Air Quality Standards Attainment Status** 

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

<sup>1.</sup> Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.

<sup>2.</sup> Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009.

- 3. For the 1997, 2008 and the 2015 Standard.
- 4. Cannot be classified
- 5. Designation was made as part of EPA's designations for the 2010 SO<sub>2</sub> Primary National Ambient Air Quality Standard Round 3 Designation in December 2017
- \* Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports

Source: SMAQMD. "Air Quality Pollutants and Standards". Web. Accessed: December 3, 2018. http://airquality.org/airquality-health/air-quality-pollutants-and-standards

ROG1 CO  $NO_x$  $PM_{10}$  $PM_{2.5}$ (lbs/day) (lbs/day) (lbs/day)  $(\mu g/m^3)$ (lbs/day)  $80^{3*}$ 82<sup>3\*</sup> Construction (short-term) None 85 CAAQS<sup>2</sup> 803\* 82<sup>3\*</sup> Operational (long-term) 65 65 **CAAQS** 

**Table IS-5: SMAQMD Significance Thresholds** 

#### **CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS**

Short-term air quality impacts are mostly due to dust (PM<sub>10</sub> and PM<sub>2.5</sub>) generated by construction and development activities, and emissions from equipment and vehicle engines (NO<sub>x</sub>) operated during these activities. Dust generation is dependent on soil type and soil moisture, as well as the amount of total acreage actually involved in clearing, grubbing and grading activities. Clearing and earthmoving activities comprise the major source of construction dust generation, but traffic and general disturbance of the soil also contribute to the problem. Sand, lime or other fine particulate materials may be used during construction, and stored on-site. If not stored properly, such materials could become airborne during periods of high winds. The effects of construction activities include increased dust fall and locally elevated levels of suspended particulates. PM<sub>10</sub> and PM<sub>2.5</sub> are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

## **CONSTRUCTION PARTICULATE MATTER EMISSIONS**

The Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide) includes screening criteria for construction-related particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction PM<sub>10</sub> or PM<sub>2.5</sub> thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;

<sup>1.</sup> Reactive Organic Gas

<sup>2.</sup> California Ambient Air Quality Standards

<sup>3\*.</sup> Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.

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

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

The project site is less than 35 acres (2 acres) and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project falls below the SMAQMD Guide screening criteria for PM<sub>10</sub> and PM<sub>2.5</sub>. The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. These requirements are already required by existing rules and regulations, and have also been included as mitigation.

# **OZONE PRECURSOR EMISSIONS (NO<sub>x</sub>)**

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

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

7. Require soil disturbance (i.e., grading) that exceeds 15 acres per day. Note that 15 acres is a screening level and shall not be used as a mitigation measure.

# **CONSTRUCTION EMISSIONS CONCLUSION**

The screening criteria for construction emissions related to both particulate matter and ozone precursors are almost identical, as shown above. As noted, the Somers Hangar Expansion project site is less than 35 acres (2 acres), does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; or, import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project falls below the SMAQMD Guide screening criteria for construction emissions related to both Particulate Matter and Ozone precursors and impacts are *less than significant*.

#### **OPERATIONAL EMISSIONS/LONG-TERM IMPACTS**

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

Email correspondence from the applicant team dated January 20, 2023, states, there are currently 12 planes onsite and that the total number of planes will remain 12 after project construction. Therefore, an expansion of use related to aircraft is not expected and operational emissions analysis is limited to the expansion of the buildings.

Typically, a project must be comprised of large acreages or intense uses in order to result in significant operational air quality impacts. The proposed expansion project is on a developed, small two-acre site, with a combination of uses consisting of the aircraft hangar, private valet parking garage area, storage, and offices. For ozone precursor emissions, the screening table in the SMAQMD Guide allows users to screen out projects that include up to 516 ksf (thousand square feet) for general office buildings. For particulate matter emissions, the screening table allows users to screen out projects that include up to 1,100 ksf for general office buildings. No other comparable uses associated with the project are listed in the screening table. The proposed expansion project will add 42,960± square feet to the existing 21,223± square foot aircraft hangar facility, for a total square footage of approximately 64,183± gross square feet. This total square footage is substantially less compared to the other commercial uses screening levels in the table. Thus, the proposed project is below these screening thresholds. Impacts related to operational emissions are *less than significant*.

# CRITERIA POLLUTANT HEALTH RISKS

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

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

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

#### **HEALTH EFFECTS SCREENING**

In order to estimate the potential health risks that could result from the operational emissions of ROG, NO<sub>X</sub>, and PM<sub>2.5</sub>, 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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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 PM<sub>2.5</sub> 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-6 and Table IS-7.

Table IS-6: PM<sub>2.5</sub> Health Risk Estimates

PM <sub>2.5</sub> Health Endpoint	Age Range <sup>1</sup>	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) <sup>2,5</sup> (Mean)	Incidences Across the 5- Air-District Region Resulting from Project Emissions (per year) <sup>2</sup>	Percent of Background Health Incidences Across the 5- Air-District Region <sup>3</sup>	Total Number of Health Incidences Across the 5-Air- District Region (per year) <sup>4</sup>
Respiratory		(ivican)	(ivically		
Emergency Room Visits, Asthma	0 - 99	1.1	1.1	0.0058%	18419
Hospital Admissions, Asthma	0 - 64	0.075	0.070	0.0038%	1846
Hospital Admissions, All Respiratory	65 - 99	0.36	0.32	0.0016%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.20	0.18	0.00075%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000098	0.000092	0.0024%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0090	0.0085	0.0028%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.020	0.019	0.0026%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.033	0.032	0.0026%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.12	0.11	0.0023%	5052
Mortality					
Mortality, All Cause	30 - 99	2.4	2.2	0.0049%	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-7: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range <sup>1</sup>	Incidences Across the Reduced Sacramento 4- km Modeling Domain Resulting from Project Emissions (per year) <sup>2,5</sup> (Mean)	Incidences Across the 5- Air-District Region Resulting from Project Emissions (per year) <sup>2</sup> (Mean)	Percent of Background Health Incidences Across the 5- Air-District Region <sup>3</sup>	Total Number of Health Incidences Across the 5- Air-District Region (per year) <sup>4</sup>
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.090	0.071	0.00036%	19644
Emergency Room Visits, Asthma	0 - 17	0.40	0.34	0.0058%	5859
Emergency Room Visits, Asthma	18 - 99	0.66	0.56	0.0045%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.056	0.047	0.00016%	30386

#### Notes:

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

5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*.

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

#### **CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS**

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

# **HYDROLOGY AND WATER QUALITY**

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

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

 Expose people or structures to substantial loss of life, health, or property as a result of flooding.

The project site is located within an area identified on the FEMA FIRM Panel Number 06067C0067H as "Zone X," 500-year floodplain," which indicates there is a less than 0.2 percent chance of a flood event occurring on the site for any given year. The project site is also located within the Magpie Creek watershed and within proximity to the existing Magpie Creek drainage channel. The project site is not located within the local flood hazard zone, but a majority of the surrounding area is located within this zone. A Preliminary Drainage Study dated August 23, 2022 was prepared for the proposed project by Stantec (see Appendix A). Plate IS-5 is an enlarged site plan included with the drainage study that illustrates the project's on-site and off-site improvements. According to the applicant, the project is a slab on grade expansion to an existing structure on a flat site, in which minimum grading will be needed. A minimal amount of soil will be exported from the site as a result of spoils from foundation, utility excavations, and trenching activities.

According to the Preliminary Drainage Study, the existing asphalt and concrete pavements within the parking area and the concrete sidewalk along the perimeter of the existing hangar will be removed. The existing private backbone storm drain system will remain in place and continue to convey storm water runoff from on-site and off-site areas to the north. Proposed on-site storm drain infrastructure, which will include a bioretention basin, will connect to the existing private storm drain system. The minimum and maximum elevations will be 70.30 feet (proposed bioretention basin bottom) and 74.50 feet (hangar finish floor). The finish floor elevation of the proposed hangar and garage will conform to the existing hangar elevation of 74.50 feet. The parking area at the front of the existing hangar and the side of the proposed hangar will have a uniform surface gradient and slope in one direction.

The Preliminary Drainage Study concluded that the proposed project site runoff is anticipated to be more than the existing site runoff due to more surface area sheet flow draining into the existing private 24" storm drain system. Storm water will sheet flow across the parking areas and will be intercepted by curb and gutter, which will convey the storm water to grated inlets. The storm water captured by the inlets will be piped to either the bioretention basin or a StormFilter with outlet pipes connecting to the existing storm drain system on-site. The bioretention basin inlet will intercept and allow the higher sheet flow rates to bypass treatment. The treated storm water will be intercepted by pipe within the basin's gravel layer and conveyed to the grated inlet. The StormFilter will allow higher sheet flow rates to flow over its internal weir. The existing and proposed building finish floor elevations are above the ponding water surface elevations expected to occur on-site during a 100-year storm event. Additionally, the maximum flooding depth possible within the parking areas will be less than 1 foot.

The proposed project and associated drainage study were reviewed by the County Department of Water Resources (DWR) for issues related to drainage on the project site.

DWR staff (Durkee) approved the Level 4 drainage study prepared for the project. The report concluded that the proposed 100-year storm discharge rate and volume released from the project site will be equal to the existing condition. The project will comply with the County Improvement Standards, the Water Agency Code, and the Floodplain Management Ordinance, including conditions requiring minimum pad/floor elevations and requiring non-enclosed parking areas to be constructed no lower than one foot below the base flood elevation. Project impacts related to drainage are *less than significant*.



Plate IS-5: Enlarged Site Plan with On-site and Off-site Improvements

#### WATER QUALITY

#### **CONSTRUCTION WATER QUALITY: EROSION AND GRADING**

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

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

The 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*.

## **HAZARDS AND HAZARDOUS MATERIALS**

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

- Create a significant hazard to the public or environment through routine transport, use, or disposal of hazardous materials;
- Will create reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Will emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, or

• Be located on a site which is included on a list of hazardous materials sites and, as a result, creates a significant hazard to the public or environment.

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.

#### SITE ENVIRONMENTAL HISTORY

#### McClellan Air Force Base

The project site consists of one parcel. The parcel is located in the eastern, central portion of the decommissioned, 3,452-acre McClellan Air Force Base. The base was operated from 1936 until 2001 as an aircraft repair depot and supply base. Prior to the decommissioning of the base, the US Air Force began remedial actions of the facility. McClellan Air Force Base is listed in the Department of Defense's (DOD) and the U.S. Environmental Protection Agency's (EPA) Superfund National Priorities List (NPL) databases with boundaries extending beyond the base itself and including the subject site. The status of the DOD listing is scheduled to close. According to the State of California Water Board's GeoTracker database, the 3,452-acre NPL site was divided into hundreds of separate areas that have unique cleanup and management plans. The GeoTracker program, which is a resource for identifying environmental data (including the location of leaking underground storage tanks (USTs), cleanup sites, disposal sites, monitoring wells, sites with hazardous waste permits and the status of such sites) for regulated facilities. The program indicated that there is a closed hazardous materials clean-up case related to the former McClellan Air Force Base and aircraft maintenance (Case No.: DOD100194700) associated with the project site.

The Remedial Action Completion Report (RACR) associated with this area refers to the site location as Lot 16. Lot 16's boundary lines match existing parcel boundary lines. According to GeoTracker, the hazardous materials clean-up case includes the following potential containments of concern entering soils: polychlorinated biphenyls (PCBs), tetrachloroethylene (PCE), trichloroethylene (TCE), vinyl chloride, and other chlorinated hydrocarbons. During the operation of the Air Force base, floor and trench drains in the hangar buildings were used to dispose of containments related to aircraft maintenance. Contamination of soil also occurred at an aircraft wash area. The proposed project site is located within the vicinity of a groundwater plume associated with the former Air Force base. The hazardous materials clean-up case notes stated that soil excavation occurred in 2007, removing oil-stained soils containing contaminants at the southwest corner of Building #1020 (the existing hangar building on-site). Soil excavation measured approximately 900 square feet by 4 feet deep. Historical documentation also noted the

installation of a 4,000 gallon UST near the northwestern corner of the existing hangar building. The case was closed on December 15, 2018. Based on the regulatory status, this case would not be expected to pose a significant environmental concern for the project site.

Since contaminants exceed residential screening levels, a Land Use Covenant (LUC) was recorded against the entire parcel in February 2013. LUCs are recorded in order to limit public exposure to remnant hazardous materials, wastes, or substances that remain on the property which are not suitable for unrestricted land uses. The LUC restricts residential, hospital, schools (public or private), and day care facilities on the parcel. The LUC also specifies that any soil disturbance (digging, excavation, grading, trenching, etc.) must be conducted in accordance with the state-approved Site-Specific Soils Management Manual (SMM).

Compliance with the existing LUC would ensure that impacts related to past contaminants onsite are *less than significant*.

## **OPERATIONAL CONSIDERATIONS**

The applicant indicated that office employees working within the office space expansion area will be safeguarded from the fumes associated with the fueling and take-off of planes from the hangar expansion portion of the project. The aircraft are fueled outside of the hangar envelope only and the aircraft engines are only activated when the aircraft is also outside of the hangar; therefore, employees would not be exposed to noxious fumes associated with fueling and engine combustion.

Impacts related to hazardous emissions 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.<sup>2</sup>

# **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 <a href="http://www.green.saccounty.net/Documents/sac 030843.pdf">http://www.green.saccounty.net/Documents/sac 030843.pdf</a>. 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

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<sup>&</sup>lt;sup>2</sup> 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 Phase 1 CAP is a strategy and framework document. The County adopted the Phase 2A CAP (Government Operations) on September 11, 2012. Neither the Phase 1 CAP nor the Phase 2A CAP are "qualified" plans through which subsequent projects may receive CEQA streamlining benefits. The Communitywide CAP (Phase 2B) has been in progress for some time (https://planning.saccounty.net/PlansandProjectsIn-Progress/Pages/CAP.aspx) but was placed on hold in late 2018 pending in-depth review of CAP-related litigation in other jurisdictions.

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 CO<sub>2</sub>e per year). If a project's operational emissions are less than for equal to 1,100 metric tons of CO<sub>2</sub>e 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-8. 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-8.

Table IS-8: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects								
	Construction Phase	Operational Phase						
Greenhouse Gas as CO <sub>2</sub> e	1,100 metric tons per year	1,100 metric tons per year						
Stationary Source Only								
	Construction Phase	Operational Phase						
Greenhouse Gas as CO <sub>2</sub> e	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; therefore, construction-related GHG impacts are considered *less than significant*.

## **OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS**

The existing aircraft hangar facility already is connected and utilizes natural gas service. According to the project applicant, the use of natural gas for the proposed expansion will only be needed in relation to climate control (primary heating) for the office space expansion. As noted previously, the proposed expansion is approximately 7,783 square feet. CalEEMod version 2020.4.0 was used to quantify annual operational emissions for the project and consisted of two separate annual runs; the runs are combined in Appendix B.

Since the proposed office area would be the only new area utilizing natural gas, the first CalEEMod run modeled operational emissions for this area separately from the rest of the proposed structures in order to calculate emissions from the expansion of natural gas use. The use of natural gas is modeled within the Operational Energy Use section of the model. The Operational Energy Use tab is split into three areas: Title 24, Non-Title 24, and lighting. Electricity use is split into each of these areas. The Title 24 of the California Code of Regulations, known as the California Building Standards Code (or "Title 24"), uses are defined as the major building envelope systems covered by Part 6 (California Energy Code) of Title 24 such as space heating, space cooling, water heating, and ventilation. Lighting was separated out since it can be both part and not part of Title 24. Since lighting is not considered as part of the building envelope energy budget, CalEEMod does not consider lighting to have any further association with Title 24 references in the program. Non-Title 24 is everything else such as appliances and electronics. Natural gas is just distinguished as Title 24 or Non-Title 24.

The default Title 24 and Non-Title 24 Electricity and Natural Gas Fields for General Office Buildings were then adjusted to reflect the applicants proposal of natural gas only being

used for primary heating. Non-Title 24 gas intensity field was zeroed out and the kilo British Thermal Unit (kBTU) was converted to kilowatt hours (kWh) and added to the non-Title 24 electricity field. The California Air Pollution Central Officers Association's (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health Equity (December 2021) was used to calculate energy demand for primary heating in Sacramento County. Table E-15.2 breaks down Commercial Energy Consumption by End Use,1 Electricity Demand Forecast Zone, and Building Type. The General Office Building land use for Electricity Demand Forecast Zone number 13 (Sacramento County) shows that 285 Therms per 1,000 square feet are needed per year for primary heating. Since CalEEMod uses kBTU, units were converted. Based upon the 7,783-square foot space, energy demand for primary heating would be equivalent to 221,815.50 kBTU per year. The expansion of natural gas for operational heating of the new office space would result in approximately 11.91 MT CO<sub>2</sub>e annually.

The second CalEEMod run quantified annual operational emissions for the unconditioned hangar and enclosed parking garage. Since natural gas will not be utilized in either of these structures, both the Title 24 and non-Title 24 natural gas fields were zeroed out. The default inputs for unrefrigerated warehouse – no rail (hangar) were modified to remove default Title 24 natural gas inputs and redistributed the converted kWh to the Title 24 electricity field.

The total annual CO<sub>2</sub>e for the entirety of the project (offices, hangar, garage, landscaping) is approximately 253.93 MT per year, which is significantly less than the screening threshold of 1,100 MT of CO<sub>2</sub>e per year.

In order to be consistent with BMP 1 of the SMAQMD Tier 1 BMPs, the project would either need to comply fully with the standard or would need to offset the additional 11.91 MT CO<sub>2</sub>e produced annually for heating using natural gas. The US average electricity source emissions of 0.818 lbs CO<sub>2</sub>e per kWh (U.S. EPA 2022). A 9 kW solar system generates approximately 10,000 kWh annually which would offset approximately 8,180 lbs of CO<sub>2</sub>. In order to offset the estimated 11.91 MT (26,257.055 pounds) CO<sub>2</sub>e from heating the project proponent would need to provide a 29kW solar system. This requirement has been included as a minimization measure within the MMRP to ensure compliance.

BMP 2 of the SMAQMD Tier 1 BMPs requires projects to provide the minimum EV Ready parking stalls. Per Table 5.106.5.3.3 of the 2019 California Green Building Code Standards, the project would be required to provide two EV Ready parking stalls. The California Green Building Code was recently revised and this requirement has increased. The project as proposed is proposing one EV charging station. The hangar project will need to install additional stalls consistent with standards in effect at the time the first subsequent permit (grading, building permit, etc) is obtained from Sacramento County in order to meet BMP 2 of the Tier 1 BMPs.

As discussed above, the proposed project will be required to comply with Tier 1 BMPs or demonstrate to the satisfaction of the Environmental Coordinator that proposed

alternatives will satisfy an equivalent level of GHG reductions as the Tier 1 BMPs. The impacts from GHG emissions are *less than significant with mitigation*.

## **ENVIRONMENTAL MITIGATION MEASURES**

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

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

Applicant	Original Signature on File	Date:	

# MITIGATION MEASURE A: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

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

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed
  as soon as possible. In addition, building pads should be laid as soon as possible
  after grading unless seeding or soil binders are used.

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

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1].
   For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance\_cert1.html.

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

## **MITIGATION MEASURE B: SMAQMD TIER 1 BMPs**

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

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

- BMP 1: No natural gas: Projects shall be designed and constructed without natural gas infrastructure.
- BMP 2: Electric vehicle ready: Projects shall meet the current CalGreen Tier 2 standards, except all EV Capable spaces shall instead be EV Ready.

If the project proponent chooses to propose alternatives, they will need to submit documentation to the satisfaction of the Environmental Coordinator demonstrating that the alternatives are equivalent to Tier 1 BMPs. Documentation shall be submitted to PER prior to approval grading plans or building permits, whichever occurs first.

## **MITIGATION MEASURE COMPLIANCE**

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is \$2,900.00. This fee includes administrative costs of \$1,050.00.

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

## **INITIAL STUDY CHECKLIST**

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. LAND USE - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			Х		The project is consistent with the environmental policies of the Sacramento County General Plan, North Highlands/Old Foothill Farms Community Plan and Sacramento County Zoning Code. Refer to the Land Use discussion in the Environmental Effects section above.
b. Physically disrupt or divide an established community?			Х		The project will not create physical barriers that substantially limit movement within or through the community.
2. <b>POPULATION/HOUSING -</b> 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)?			×		The project will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations. A less than significant impact will result.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?			Х		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 pro	oject:				
Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils. No impact will occur.
b. Conflict with any existing Williamson Act contract?				Х	No Williamson Act contracts apply to the project site. No impact will occur.

c. Introduce incompatible uses in the vicinity of	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments  The project does not occur in an area of agricultural
existing agricultural uses?					production. No impact will occur.
4. <b>AESTHETICS -</b> Would the project:					
Substantially alter existing viewsheds such as scenic highways, corridors or vistas?				Х	The project does not occur in the vicinity of any scenic highways, corridors, or vistas. No impact will occur.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?				Х	The project is not located in a non-urbanized area. No impact will occur.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			Х		It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity. A less than significant impact will result.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		With the aircraft hangar currently in operation, the project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area. A less than significant impact will result.
5. AIRPORTS - Would the project:					
Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?			Х		The project is located within the safety zone of McClellan Airport. Refer to the Airports discussion in the Environmental Effects section above.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?			Х		The project is located adjacent to McClellan Airport and is within the 65dB noise contour. Refer to the Airports discussion in the Environmental Effects section above.

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
C.	Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?			Х		The project is located adjacent to McClellan Airport. Refer to the Airports discussion in the Environmental Effects section above.
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?			Х		The project does involve or may potentially affect air traffic movement. Refer to the Airports discussion in the Environmental Effects section above.
6.	PUBLIC SERVICES - Would the project:					
a.	Have an adequate water supply for full buildout of the project?			Х		The water service provider (Sacramento Suburban Water District) has adequate capacity to serve the water needs of the proposed project. A less than significant impact will result.
b.	Have adequate wastewater treatment and disposal facilities for full buildout of the project?			Х		The Sacramento Regional County Sanitation District has adequate wastewater treatment and disposal capacity to service the proposed project. A less than significant impact will result.
C.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			Х		The Kiefer Landfill has capacity to accommodate solid waste until the year 2050. A less than significant impact will result.
d.	Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?			Х		Minor extension of infrastructure would be necessary to serve the proposed project. Existing service lines are located within existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from service line extension.

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e.	Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			Х		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?			Х		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g.	Result in substantial adverse physical impacts associated with the provision of emergency services?			Х		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service. A less than significant impact will result.
h.	Result in substantial adverse physical impacts associated with the provision of public school services?			Х		The project will not require the use of public school services. A less than significant impact will result.
i.	Result in substantial adverse physical impacts associated with the provision of park and recreation services?			Х		The project will not require park and recreation services. A less than significant impact will result.
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?			Х		The project does not conflict with or is inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). The vehicles miles traveled associated with the aircraft hangar expansion project will have minor transportation impacts. A less than significant impact will result.

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b.	Result in a substantial adverse impact to access and/or circulation?			Х		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?			Х		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			х		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. A less than significant impact will result.
b.	Expose sensitive receptors to pollutant concentrations in excess of standards?			Х		There are no sensitive receptors (i.e., schools, nursing homes, hospitals, daycare centers, etc.) adjacent to the project site.  See Response 8.a.
C.	Create objectionable odors affecting a substantial number of people?			Х		The project could result in occasional or periodic odors, but is adjacent to McClellan Airport and is an expansion of an existing aircraft hangar facility. A less than significant impact will result.

	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?			Х		The project is adjacent to a noise source (McClellan Airport) that generates noise in excess of applicable standards, but is an expansion of an existing aircraft hangar facility that is already susceptible to this noise.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			Х		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.			Х		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary. A less than significant impact will result.
10. HYDROLOGY AND WATER QUALITY - Would	the project:				
Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			Х		The project will not substantially increase water demand over the existing use. A less than significant impact will result.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			Х		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?			Х		The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area. Adjacent properties are located within a local flood hazard area. Compliance with the County Floodplain Management Ordinance, County Drainage Ordinance, and Improvement Standards will assure less than significant impacts. Refer to the Hydrology discussion in the Environmental Effects section above.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			Х		The project site is not within a 100-year floodplain. A less than significant impact will result.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?			Х		The project is not located in an area subject to 200-year urban levels of flood protection (ULOP). A less than significant impact will result.
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?			Х		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. A less than significant impact will result.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			Х		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards. A less than significant impact will result.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			Х		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality. A less than significant impact will result.
11. GEOLOGY AND SOILS - Would the project:					

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
a.	Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			Х		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?			Х		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction. A less than significant impact will result.
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 onor off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?			X		The project is not located on an unstable geologic or soil unit. A less than significant impact will result.
d.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			Х		A public sewer system is available to serve the project. A less than significant impact will result.
e.	Result in a substantial loss of an important mineral resource?			Х		The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site. A less than significant impact will result.
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			Х		No known paleontological resources (e.g. fossil remains) or sites occur at the project location. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
12. BIOLOGICAL RESOURCES - Would the project	t:				
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?			Х		No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations. A less than significant impact will result.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			Х		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site. A less than significant impact will result.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			Х		No protected surface waters are located on or adjacent to the project site. A less than significant impact will result.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			Х		The project site is already developed. Project implementation would not affect native resident or migratory species. A less than significant impact will result.
e. Adversely affect or result in the removal of native or landmark trees?			Х		No native and/or landmark trees occur on the project site, nor is it anticipated that any native and/or landmark trees would be affected by off-site improvement required as a result of the project. A less than significant impact will result.
f. Conflict with any local policies or ordinances protecting biological resources?			Х		The project is consistent with local policies/ordinances protecting biological resources. A less than significant impact will result.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			Х		There are no known conflicts with any approved plan for the conservation of habitat. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments					
13. CULTURAL RESOURCES - Would the project:	13. CULTURAL RESOURCES - Would the project:									
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project. A less than significant impact will result.					
b. Have a substantial adverse effect on an archaeological resource?			×		The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources. A less than significant impact will result.					
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		No known human remains exist on the project site.  Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation. A less than significant impact will result.					
14. TRIBAL CULTURAL RESOURCES - Would the	project:									
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. A less than significant impact will result.					
15. HAZARDS AND HAZARDOUS MATERIALS - \	Nould the pr	oject:								
Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			Х		Refer to the Hazards and Hazardous Materials discussion in the Environmental Effects section.					
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			Х		Refer to the Hazards and Hazardous Materials discussion in the Environmental Effects section.					

	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 site is located within ¼ mile of two existing schools, Community Outreach Academy, an elementary charter school, and an adult education school for the Twin Rivers Unified School District. Refer to the Hazards and Hazardous Materials discussion in the Environmental Effects section.
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		Refer to the Hazards and Hazardous Materials discussion in the Environmental Effects section.
Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			Х		The project would not interfere with any known emergency response or evacuation plan. A less than significant impact will result.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			Х		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires. A less than significant impact will result.
16. ENERGY – Would the project:					
Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		While the project will expand an existing aircraft hangar facility 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?			Х		The project will comply with Title 24, Green Building Code, for all project efficiency requirements. A less than significant impact will result.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments		
17. GREENHOUSE GAS EMISSIONS – Would the project:							
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			Х		The project screens out of further analysis and impacts are less than significant. Refer to the GHG Emissions discussion in the Environmental Effects section.		
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			Х		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases. A less than significant impact will result.		

## **SUPPLEMENTAL INFORMATION**

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	Intensive Industrial	Х		
Community Plan	SPA (McClellan Park Special Planning Area)	Х		
Land Use Zone	SPA (McClellan Park Special Planning Area)	Х		

## **APPENDICES**

Appendix A: A Drainage Report titled *Drainage Study for 5617 Price Avenue – Hangar Expansion* prepared by Stantec dated August 23, 2022

Appendix B: Combined Annual CalEEMod Runs

## REFERENCES

Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health Equity. California Air Pollution Central Officers Association, December 2021.

GHG Emission Factors Hub. Emissions and Generation Resource Integrated Database (eGRID). U.S. Environmental Protection Agency, April 2022. https://www.epa.gov/climateleadership/ghg-emission-factors-hub

## **INITIAL STUDY PREPARERS**

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