Todd Smith, Planning Director
Planning and Environmental Review

Troy Givans, Director
Department of Community Development

County of Sacramento

Mitigated Negative Declaration

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

1. **Control Number:** PLNP2018-00070

2. **Title and Short Description of Project:** Verde Cruz Townhomes
   The project requests the following entitlements from the County of Sacramento:

   1. A **Tentative Subdivision Map** to divide an approximately 1.75 acre parcel into 17 residential lots and one common/landscape area lot in the Residential (RD-10) Natural Streams (NS) zoning district.
   2. A **Use Permit** to allow more than 10 attached single-family dwelling lots in the RD-10(NS) zoning district.
   3. A **Special Development Permit** to allow the proposed project to deviate from the following development standards:

      - Minimum Interior Lot Area (Section 5.4.2.B, Table 5.7.A): The standard for minimum lot area in the RD-10 zoning district is 3,000 square feet. The project proposes a minimum lot size of 1,568 square feet.
      - Minimum Interior Lot Width (Section 5.4.2.B, Table 5.7.A): The standard for minimum interior lot width in the RD-10 zoning district 30 feet. The project proposes a minimum interior lot width of 16.7 feet.
      - Minimum Corner Lot Width (Section 5.4.2.B, Table 5.7.A): The standard for minimum corner lot width in the RD-10 zoning district is 35 feet. The project proposes a minimum corner lot width of 31 feet.
      - Public Street Frontage (Section 5.4.2.B, Table 5.7.A): Up to two lots may be served by a private drive without meeting the public street frontage requirement. The project proposes that 17 lots be served by a private drive.
      - Minimum Front Yard Setback (Section 5.4.2.C, Table 5.7.C): The standard minimum front yard setback for attached single family development is 20 feet. The project as proposed provides a minimum setback of 14 feet at Parcel 11, and 17 feet at Parcel 12. All other proposed parcels meet the minimum 20 foot setback.
      - Interior Side Yard Setback (Section 5.4.2.C, Table 5.7.C): The standard minimum interior side yard setback for three story single family development is 10 feet. The project proposes a 7.6 foot interior side yard setback for Parcel 1, a 7.5 foot setback for Parcel 10, a 5.7 foot setback for Parcel 11, and a 3.82 foot setback for Parcel 17.
      - Minimum Rear Yard Setback (Section 5.4.2.C, Table 5.7.C): The standard for minimum rear yard setback is 20 percent of the parcel. Parcels 1, 2, 7, 8, 9, and 10 deviate from the minimum standard.

   4. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design*

Guidelines (Design Guidelines).

3. **Assessor's Parcel Number:** 236-0254-009

4. **Location of Project:** The project site is located at 4904 Manzanita Avenue, at the northeast corner of Manzanita Avenue and Bourbon Drive, in the Carmichael/Old Foothill Farms community of unincorporated Sacramento County.

5. **Project Applicant:** MP Brothers

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

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

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

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: PLNP2018-00070

NAME: Verde Cruz Townhomes

LOCATION: The project site is located at 4904 Manzanita Avenue, at the northeast corner of Manzanita Avenue and Bourbon Drive, in the Carmichael/Old Foothill Farms community of unincorporated Sacramento County.

ASSESSOR'S PARCEL NUMBER: 236-0254-009

OWNER/APPLICANT:

MP Brothers
4408 Bijan Court
Fair Oaks, CA 95628
Contact: Nick Parashchak

PROJECT DESCRIPTION

The project requests the following entitlements from the County of Sacramento:

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4. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

ENVIRONMENTAL SETTING

The proposed project site is located within a suburban residential area in the northeastern portion of unincorporated Sacramento County (Plate IS-1). The vacant 1.75± acre remnant oak woodland/urban forest property is located at 4904 Manzanita Avenue (236-0254-009), on the north side of Bourbon Drive and the east side of Manzanita Avenue, in the Carmichael community (Plate IS-2). The project site is designated as Low Density Residential (LDR) within the Sacramento County General Plan (Plate IS-3). Surrounding land uses consist of single-family residential and commercial properties. The zoning of the subject property is Residential (RD-10) and the northeastern portion of the property is within the Natural Stream (NS) combining zone (Plate IS-4). The property maintains unimproved street frontage along Bourbon Drive and Manzanita Avenue. The proposed project will divide the property into seventeen (17) residential lots (Plate IS-5). Access to the project site will be provided via a private driveway off Bourbon Drive for main access to the proposed units (Plate IS-6).

The project site is undeveloped and consists of a remnant oak woodland/urban forest setting with trees that share an understory of low and dry vegetation. The dominant vegetation consists of Blue Oaks and non-native grassland species. The project area is surrounded by urban and residential development and elevations on the site range from

approximately 95 feet to 115 feet above mean sea level. The topography is gradually sloped to the northwest where Verde Cruz Creek lies along the northern property boundary. The creek transverses the northern portion of the site, running east-west until it continues through a box culvert underneath Manzanita Avenue. The only developed portions of the property are situated within upland areas and include paved roads, sidewalks, and roadside pull-offs. Across Bourbon Drive to the south, the residential neighborhood is developed with duplexes.

Plate IS-1: County Vicinity Map

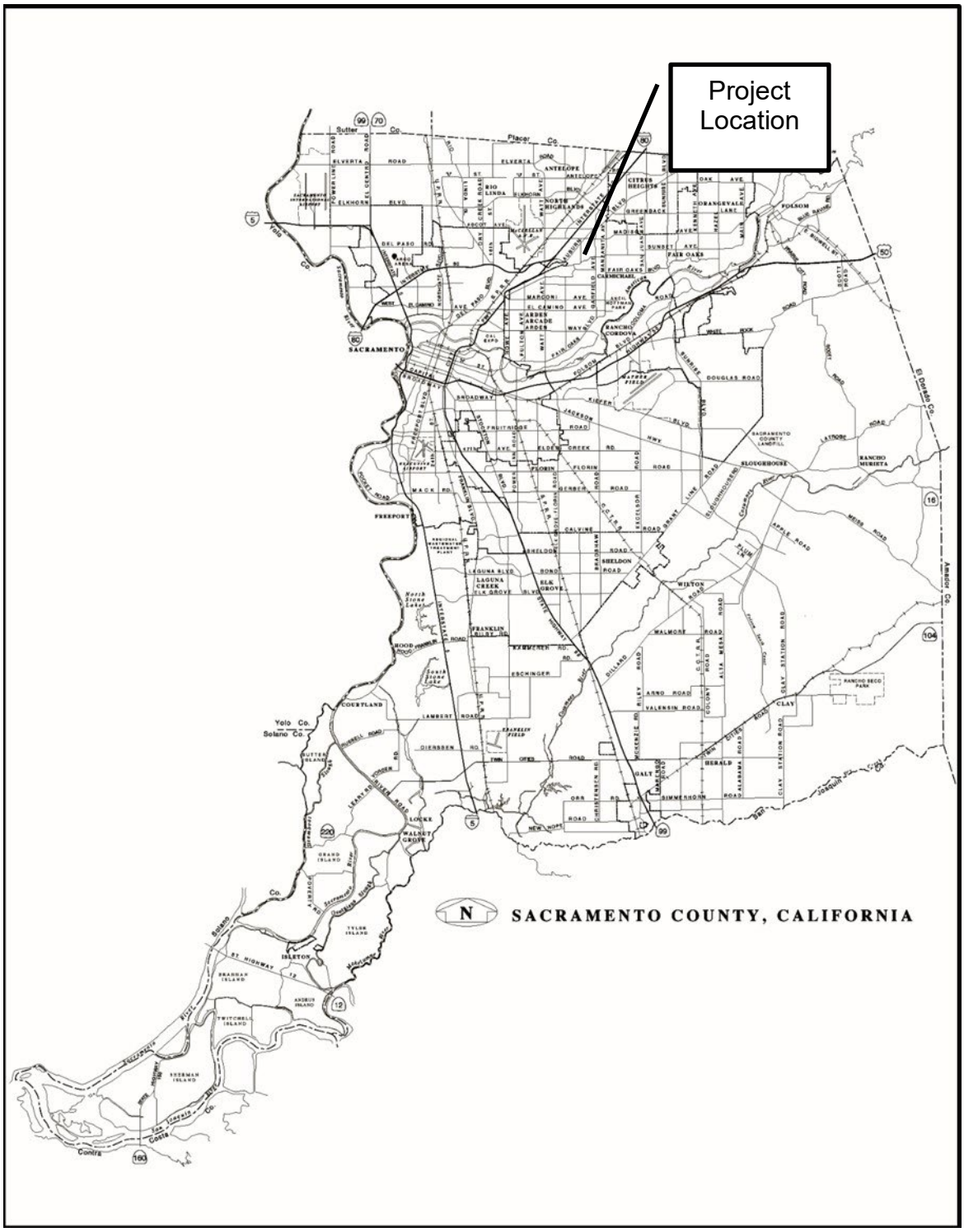


Plate IS-2: Project Vicinity Map

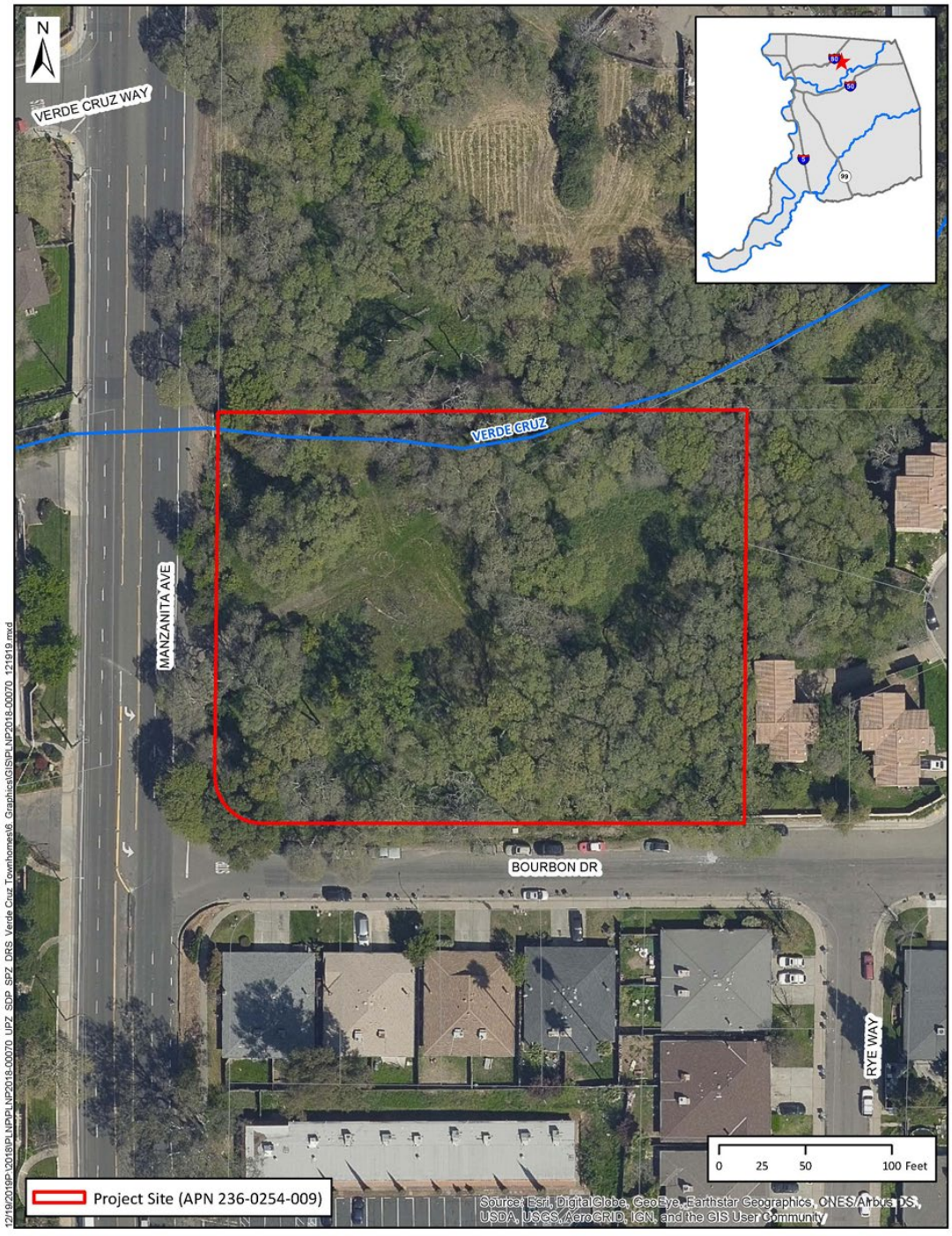


Plate IS-3: General Plan Designation

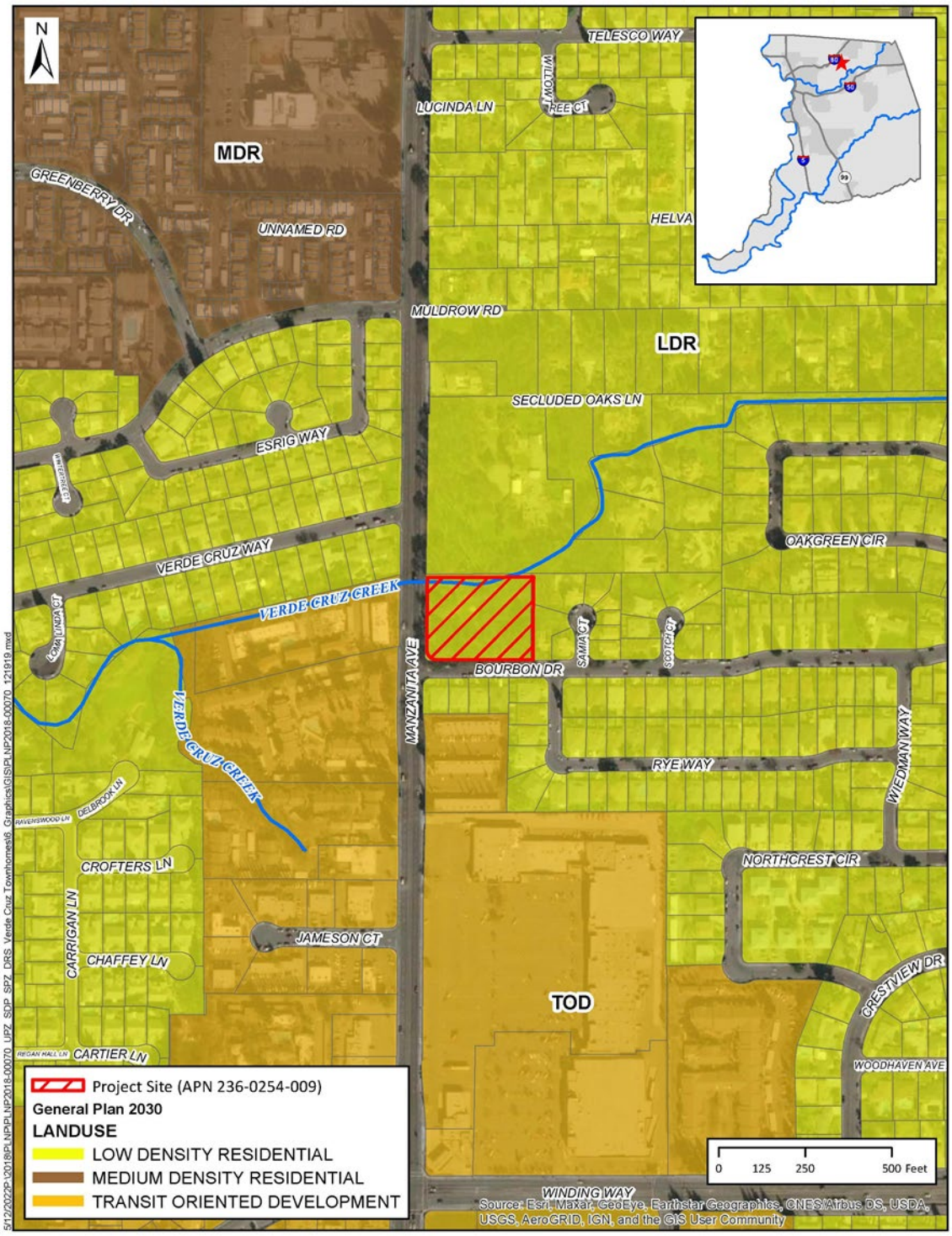


Plate IS-4: Zoning Map

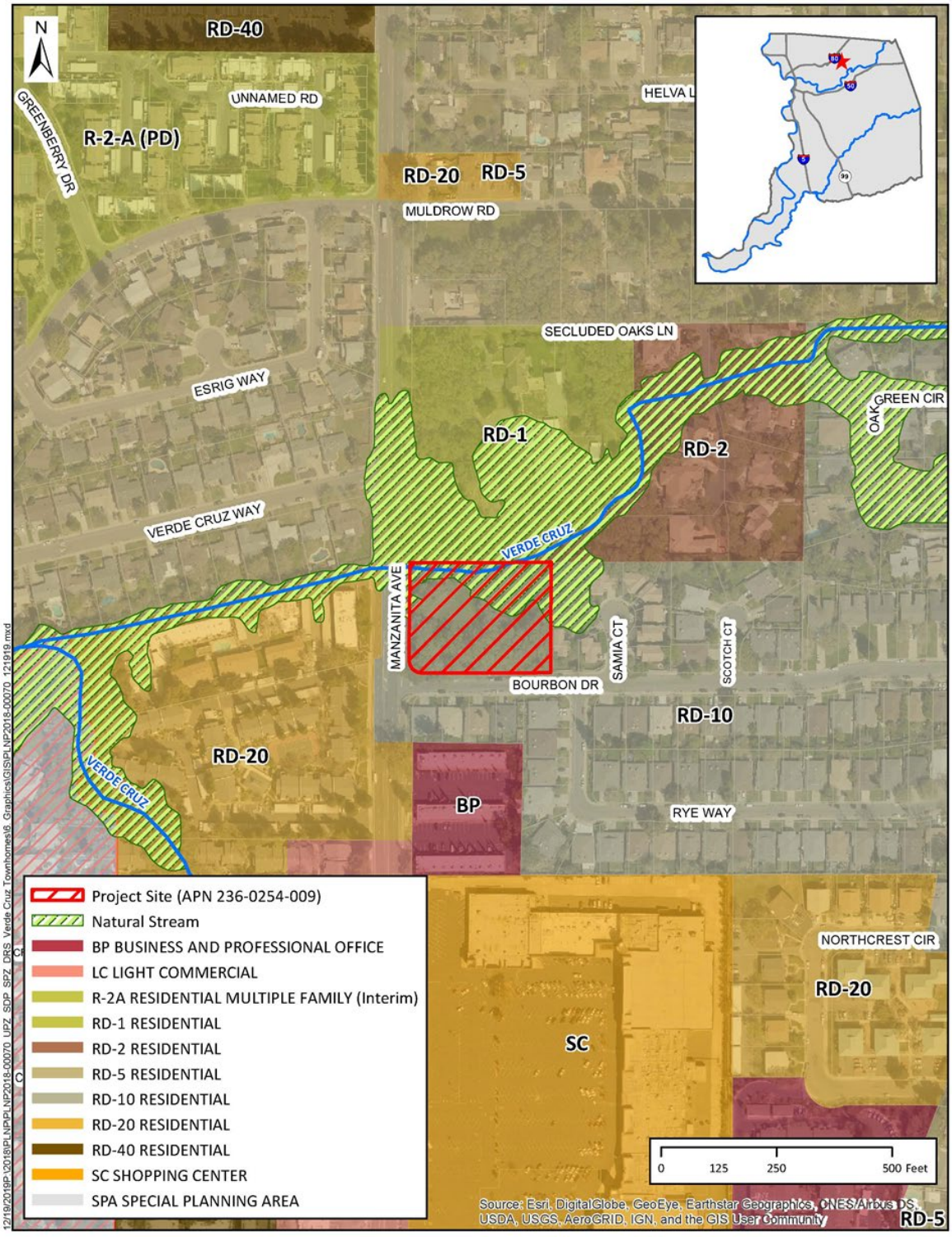


Plate IS-5: Tentative Subdivision Map

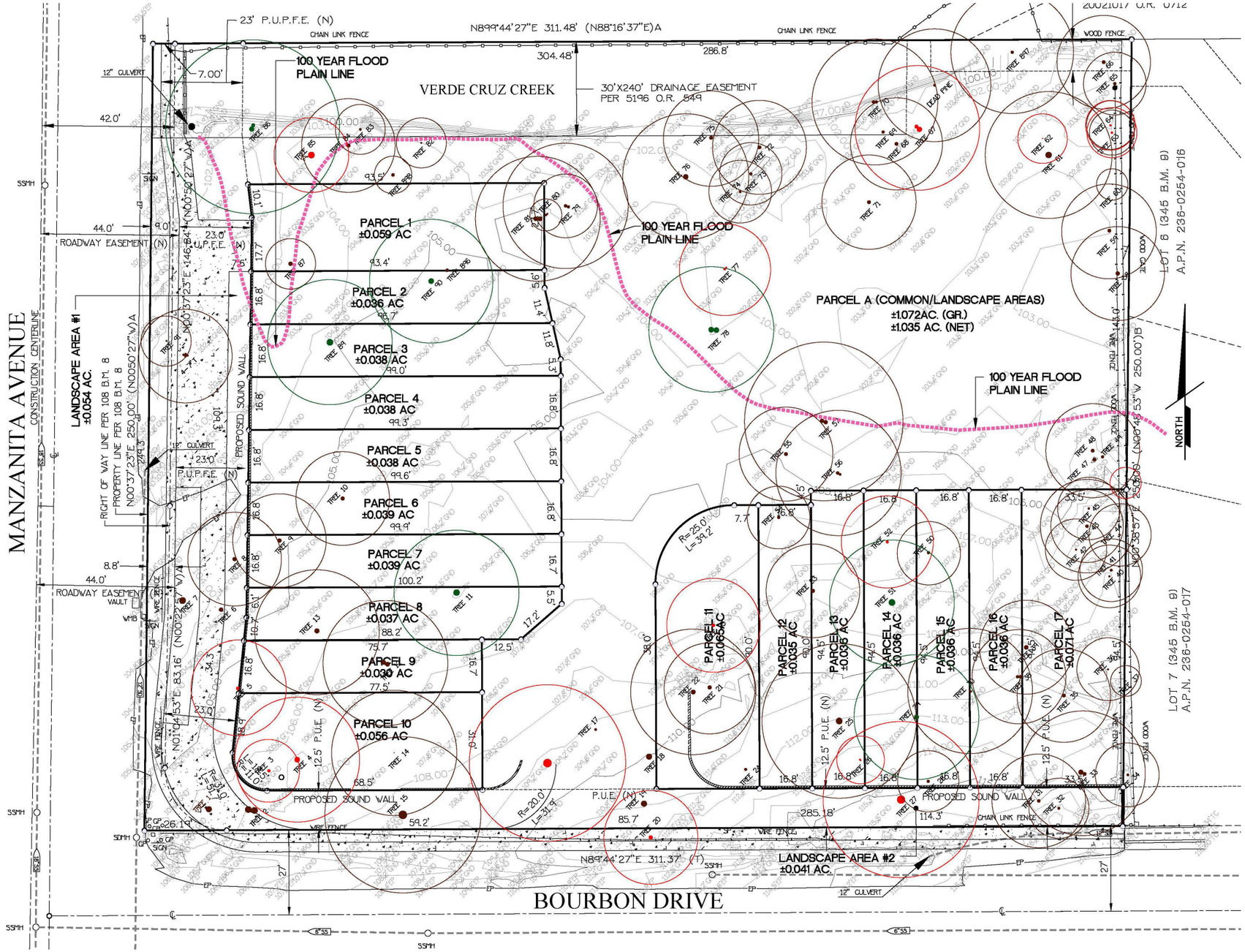
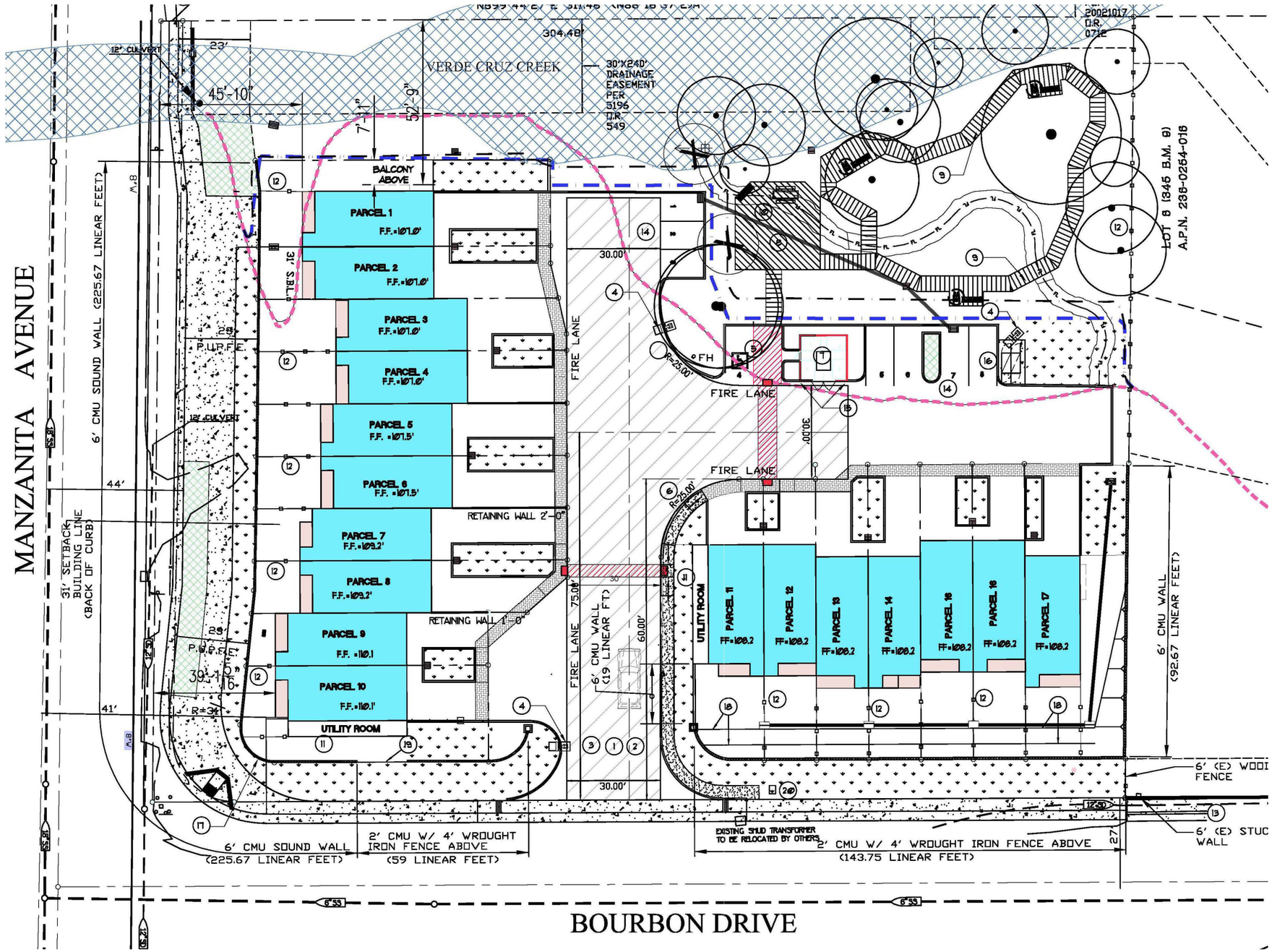


Plate IS-6: Site Plan



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?

The proposed project includes requests to create a subdivision consisting of 17 lots with attached single-family homes along with one common/landscape area, a Tentative Subdivision Map, Use Permit, as well as a Special Development Permit to deviate from setback and lot size requirements, and a Design Review.

The project is located within the Natural Streams (NS) combining zone district. Verde Cruz Creek from the confluence with Arcade Creek to approximately 1,800 feet west of Dewey Drive meets the definition of a natural stream and flows along the northern portion of the property. The Combining Zoning District works to protect current and future occupants of land subject to the physical damage of flooding and works to prevent incompatible development in flood prone areas. The Hydrology and Water Quality section below describes the drainage details of the project and how the proposed project is compatible with the (NS) zone. All permitted uses in the underlying zoning district shall be conditional uses in the (NS) combining zoning district subject to the approval of a Use Permit.

According to the County's General Plan, the project area can be considered an "infill" site, and therefore development of the parcel and connecting with public infrastructure is supported by County policy. The General Plan states that "infill" is "any new development within an established urban area where basic urban infrastructure and services exist." The project site is surrounded to the east, west (across Manzanita Avenue) and south (across Bourbon Drive) with existing development as well as scattered development to the north. Additionally, the project is located within the County's Urban Services Boundary and the Urban Policy Area, meaning that the County anticipated that this site would receive urban levels of public infrastructure and services within the current planning period (to 2030).

The parcel's General Plan designation is Low Density Residential (LDR), and the project is consistent with the designation along with the zoning of Residential (RD-10) and the Natural Stream (NS) combining zone. No conflicts have been identified with General Plan or other County policies adopted with the intent of avoiding or mitigating an environmental effect; therefore, impacts to land use 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.

VEHICLE MILES TRAVELED (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 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 developed screening criteria for development projects. The screening criteria for VMT are summarized in Table IS-1.

Table IS-1: Screening Criteria for CEQA Transportation Analysis

Type	Screening Criteria
Small Projects	• Projects generating less than 237 average daily traffic (ADT)
Local-Serving Retail[1]	• 100,000 square feet of total gross floor area or less; OR if supported by a market study with a capture area of 3 miles or less; AND • Local Serving: Project does not have regional-serving characteristics.

Local-Serving Public Facilities/Services	• Transit centers • Day care center • Public K-12 schools • Neighborhood park (developed or undeveloped) • Community center • Post offices • Police and fire facilities • Branch libraries • Government offices (primarily serving customers in-person) • Utility, communications, and similar facilities • Water sanitation, waste management, and similar facilities
Projects Near Transit Stations	• High-Quality Transit: Located within ½ a mile of an existing major transit stop[2] or an existing stop along a high-quality transit corridor[3]; AND • Minimum Gross Floor Area Ratio (FAR) of 0.75 for office projects or components; AND • Parking: Provides no more than the minimum number of parking spaces required[4]; AND • Sustainable Communities Strategy (SCS): Project is not inconsistent with the adopted SCS; AND • Affordable Housing: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units; AND • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.
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 required; 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.

[1] See Appendix A for land use types considered to be retail.

[2] 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").

[3] 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").

[4] Sacramento County Zoning Code Chapter 5: Development Standards

METHODOLOGY/CONCLUSION

The County of Sacramento Department of Transportation (DOT) reviewed the proposed project and provided an expected trip generation table, which analyzes the estimated trips from the proposed development of 17 townhomes. The DOT's trip generation table shows that the estimated daily trips for the subdivision would be 124 daily trips (Table IS-2). Since the proposed project would generate less than 237 daily trips, the project would be classified as a "small project," which means a VMT analysis is not required and the project contribution to VMT per capita is negligible. Impacts related to VMT are ***less than significant***.

Table IS-2: Trip Generation Table

Condition	Zoning or Use	Source	Daily Trip Rate	Daily Trips	AM Peak Hour Trip Rate	AM Peak Trips	PM Peak Hour Trip Rate	PM Peak Trips	Data Used
Existing Use	Vacant		0 N/A	0	0 N/A	0	0 N/A	0	N/A
Existing Zoning	RD-10 17 DU	ITE (220)	7.32 VTE/DU	124	0.46 VTW/DU	8	0.56 VTE/DU	10	Avg Rate
Proposed Use	Multi-Family (Low-Rise) 17 DU	ITE (220)	7.32 VTE/DU	124	0.46 VTW/DU	8	0.56 VTE/DU	10	Avg Rate
Proposed Use Total				124		8		10	
Increase in Trips from Existing to Proposed Use				124		8		10	

NOTES:

VTE = Vehicle Trip Ends / DU = Dwelling Unit / kvast = per 1000 vehicles of adjacent street traffic

ITE = Institute of Transportation Engineers, Trip Generation, 10th Edition (Land Use No.)

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-3). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-4).

Table IS-3: Air Quality Standards Attainment Status

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

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

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

3. For the 1997, 2008 and the 2015 Standard.

4. Cannot be classified

5. Designation was made as part of EPA's designations for the 2010 SO_2 Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017

* Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports

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

Table IS-4: SMAQMD Significance Thresholds

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

1. Reactive Organic Gas

2. California Ambient Air Quality Standards

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

CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS

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

CONSTRUCTION PARTICULATE MATTER EMISSIONS

The SMAQMD Guide includes screening criteria for construction-related particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction PM_{10} or $PM_{2.5}$ thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills); or,

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

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

The project site is less than 35 acres (1.75 gross acres) and does not involve buildings more than 4 stories tall; 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 meets the SMAQMD Guide screening criteria for PM_{10} and $PM_{2.5}$. The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. These requirements are already required by existing rules and regulations, and have also been included as mitigation.

CONSTRUCTION OZONE PRECURSOR EMISSIONS (NO_X)

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

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills);
- Require import or export of soil materials that will require a considerable amount of haul truck activity; or,
- Require soil disturbance (i.e., grading) that exceeds 15 acres per day. Note that 15 acres is a screening level and shall not be used as a mitigation measure.

CONCLUSION: CONSTRUCTION EMISSIONS

The screening criteria for construction emissions related to both particulate matter and ozone precursors are almost identical, as shown above. As noted, the Verde Cruz Townhome project site is less than 35 acres (1.75 gross acres) and does not involve buildings more than 4 stories tall, significant trenching activities; an unusually compact construction schedule; or, import or export of soil materials requiring a considerable amount of haul truck activity. 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.

Ultimately, a project typically must have large acreages or intense uses in order to result in significant operational air quality impacts. For ozone precursor emissions the screening table in the SMAQMD Guide allows users to screen out projects which include up to 485 new single family dwelling units for residential projects. For particulate matter emissions the screening table allows users to screen out projects which include up to 1,000 new single family dwelling units for residential projects. Depending on the type of commercial use, the screening level for both ozone precursor emissions and particulate matter emissions is hundreds of thousands of square feet of commercial use. The proposed project consists of 17 new townhomes, and therefore falls below these screening thresholds. Impacts related to operational emissions are expected to be ***less than significant***.

CRITERIA POLLUTANT HEALTH RISKS

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

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

HEALTH EFFECTS SCREENING

In order to estimate the potential health risks that could result from the operational emissions of ROG, NO_X, and $PM_{2.5}$, PER staff implemented the procedures within SMAQMD's I*nstructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools* (SMAQMD's Instructions). To date, SMAQMD has published three options for analyzing projects: small projects may use the Minor Project Health Screening Tool, while larger projects may use the

Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

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

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

The model derives the estimated health risk associated with operation of the project based on increases in concentrations of ozone and $PM_{2.5}$ that were estimated using a photochemical grid model (PGM). The concentration estimates of the PGM are then applied to the U.S. Environmental Protection Agency's Benefits Mapping and Analysis Program (BenMAP) to estimate the resulting health effects from concentration increases. PGMs and BenMAP were developed to assess air pollution and human health impacts over large areas and populations that far exceed the area of an average land use development project. These models were never designed to determine whether emissions generated by an individual development project would affect community health or the date an air basin would attain an ambient air quality standard. Rather, they are used to help inform regional planning strategies based on cumulative changes in emissions within an air basin or larger geography.

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

DISCUSSION OF PROJECT IMPACTS: CRITERIA POLLUTANT HEALTH RISKS

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-5 and Table IS-6

Table IS-5: $PM_{2.5}$ Health Risk Estimates

$PM_{2.5}$ Health Endpoint	Age Range[1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2]	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
		(Mean)	(Mean)		
Respiratory					
Emergency Room Visits, Asthma	0 - 99	1.0	0.96	0.0052%	18419
Hospital Admissions, Asthma	0 - 64	0.067	0.062	0.0034%	1846
Hospital Admissions, All Respiratory	65 - 99	0.37	0.33	0.0017%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.20	0.18	0.00077%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000088	0.000081	0.0021%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0078	0.0074	0.0024%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.019	0.018	0.0024%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.031	0.030	0.0024%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.13	0.12	0.0023%	5052
Mortality					
Mortality, All Cause	30 - 99	2.5	2.3	0.0050%	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-6: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range[1]	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2]	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.090	0.072	0.00037%	19644
Emergency Room Visits, Asthma	0 - 17	0.37	0.31	0.0053%	5859
Emergency Room Visits, Asthma	18 - 99	0.63	0.53	0.0042%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.057	0.048	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.

NOISE

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

- Result in exposure of persons to, or generation of, noise levels in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies.

NOISE FUNDAMENTALS & TERMINOLOGY

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

Most environmental sounds consist of several frequencies, with each frequency differing in sound level. The intensities of each frequency combine to generate sound. Acoustical professionals quantify sounds by "weighting" frequencies based on how sensitive humans are to that particular

frequency. Using this method, low and extremely high frequency sounds are given less weight, or importance, while mid-range frequencies are given more weight, because humans can hear mid-range frequencies much better than low and very high frequencies. This method is called “A” weighting, and the units of measurement are called dBA (A-weighted decibel level). In practice, noise is usually measured with a meter that includes an electrical “filter” that converts the sound to dBA. The threshold at which one hears sounds is considered to be zero (0) dBA. The range of sound in normal human experience is 0 to 140 dBA. Decibels and other technical terms are defined in Table IS-7.

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

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

Table IS-7: Acoustical Terminology

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

REGULATORY SETTING

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

STATE OF CALIFORNIA

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

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

COUNTY GENERAL PLAN NOISE ELEMENT

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

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

> NO-1. The noise level standards for noise-sensitive areas of *new* uses affected by traffic or railroad noise sources in Sacramento County are shown by Table 1 (Table IS-8 of this report). Where the noise level standards of Table 1 are predicted to be exceeded at new uses proposed within Sacramento County which are affected by traffic or railroad noise, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 1 standards (reference Table IS-8).

Table IS-8: Noise Standards for New Uses Affected by Traffic and Railroad Noise

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

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

METHODOLOGY

The project site is located adjacent to Manzanita Avenue and the existing noise environment is defined by roadway traffic. J.C. Brennan & Associates, Inc. was retained by the applicant to prepare a noise assessment (Appendix A). The intent of the noise level measurements was to determine the project noise exposure from Manzanita Avenue and provide noise reduction recommendations where necessary.

The Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA RD-77-108) was used to predict traffic noise levels at the project site. The model is based upon the California Vehicle Noise (CALVENO) noise emission factors for automobiles, medium trucks and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA model was developed to predict hourly Leq values for free flowing traffic conditions, and is considered accurate within 1.5 dB in most situations.

J.C. Brennan & Associates, Inc. conducted continuous hourly ambient noise level measurements for a period of 24-hours on the project site from November 29th to November 30th, 2017. The noise level measurements were conducted to determine typical background average (L_{eq}), median (L_{50}) and maximum (L_{max}) noise levels, and to determine the effective day/night distribution of roadway traffic for inclusion in the traffic noise prediction methodology. Instrumentation consisted of a Larson Davis Laboratories (LDL) Model 820 precision integrating sound level meter, which was calibrated in the field before and after use with an LDL Model CAL200 acoustical calibrator. Table IS-9 shows the results of the continuous hourly ambient noise level measurements approximately 250-feet from the centerline of Manzanita Avenue.

Table IS-9: Existing Measured Ambient Noise Monitoring Results

Site	Location	Date	Average Measured Hourly Noise Levels, (dBA)						
			24-hr	Daytime (7:00 am - 10:00 pm)			Nighttime (10:00 pm - 7 am)		
			L_{dn}	L_{eq}	L_{50}	L_{max}	L_{eq}	L_{50}	L_{max}
Continuous 24hr Noise Measurement Sites									
A	250-ft. from centerline of Manzanita Avenue	11/29-30/17	61	59	58	69	53	49	63
Source - j.c. brennan & associates, Inc. 2017									

Future traffic volumes for Manzanita Avenue were based upon the SACOG SACSIM15 year (year 2036) traffic model. Truck percentages and vehicle speeds on the local roadways were estimated from field observations.

DISCUSSION OF PROJECT IMPACTS

Future traffic noise levels are predicted at the outdoor activity area and the first, second, and third floor facades at the project site. Generally, second and third floor receivers will experience traffic noise levels slightly higher than noise levels at the ground floor due to the lack of ground absorption. Therefore, a +3 dB correction factor was added to the FHWA prediction model. A -5 dB correction factor was added to the FHWA model at the outdoor activity area and Block C due to partial shielding provided by townhouse buildings nearest to Manzanita Avenue.

Table IS-10 shows the predicted future traffic noise levels at the noise-sensitive areas on the project site.

Table IS-10
Predicted Exterior Traffic Noise Levels - Manzanita Avenue

Receptor	Location	Distance [1]		Model Correction [2]	Unmitigated Noise Levels, L_{dn}
Block A & B	1st Floor Façade	80-ft.		0 dB	68 dB
	2nd & 3rd Floor Facades	80-ft.		+3 dB	71 dB
Block C	1st Floor Façade	215-ft.		-5 dB	56 dB
	2nd & 3rd Floor Facades	215-ft.		-2 dB	59 dB
Outdoor Activity Area		250-ft.		-5 dB	55 dB

[1.] Distances are measured from the roadway centerline.
[2.] Cumulative
Source: FHWA-RD-77-108 with inputs from SACOG SACSim Model and j.c. brennan & associates, Inc. - 2017

OUTDOOR ACTIVITY AREAS

As indicated in Table IS-10, data for future conditions indicate that the predicted exterior traffic noise levels at the common outdoor activity area will comply with the 65 dB L_{dn} exterior noise level standard. This predicted level satisfies the Sacramento County requirement of 65 dB L_{dn} applicable to new residential developments. As a result, no additional noise mitigation would be required for the outdoor activity areas of this development.

INTERIOR NOISE LEVELS

As indicated in Table IS-10, future exterior traffic noise levels at the nearest building facades are predicted to vary depending on the height of the façade above ground. The predicted Manzanita Avenue traffic noise levels will range between 68 dB Ldn and 71 dB Ldn at the Blocks A and B building facades, and between 56 dB Ldn and 59 dB Ldn at the Block C building façade. Second and third floor façade noise levels for Blocks A and B (closest to Manzanita Avenue) will be approximately 3 dB higher than first floor façade levels due to reduced shielding of Manzanita Avenue traffic noise by the intervening 6-foot tall soundwall. As a result, varying degrees of building façade noise reduction would

be required to ensure compliance with the Sacramento County interior noise standard of 45 dBA L_{dn}. For Blocks A and B (closest to Manzanita Avenue), building façade noise reductions of 23 dBA would be required for the first floor and 26 dBA would be required for the 2nd and 3rd floor facades. For Block C (Bourbon Drive), building façade noise reductions of 11 dBA would be required for the first floor and 14 dBA would be required for the 2nd and 3rd floor facades.

The project proponent is proposing a 6-foot tall sound wall along Manzanita Avenue, which will provide a minimum sound attenuation of -5 dB at the first floor facades of each building. The wall is proposed to be constructed as follows:

- Wood frame on a concrete footing;
- 1/2" plywood or particle board siding on each side of the frame; and,
- A minimum of a two-coat stucco on the wood siding.

Standard construction practices consistent with the uniform building code typically provide a 25 dB exterior-to-interior noise level reduction with windows closed. Therefore, sensitive receptors exposed to exterior noise levels of 70 dB L_{dn}, or less, will typically comply with the Sacramento County 45 dB L_{dn} interior noise level standard. Additional noise reduction measures, such as acoustically rated windows are generally required for exterior noise levels exceeding 70 dB L_{dn}.

As indicated in Table IS-10, future exterior traffic noise levels at the nearest building facades are predicted to vary depending on the height of the façade above ground. First floor facades of each building will be exposed to traffic noise levels of 70 dB Ldn or less, without applying the shielding from the proposed sound wall. Therefore, it is expected that interior noise levels at first floor rooms will comply with the interior noise level standard of 45 dB Ldn. The second and third floor facades for the Block A and B buildings (adjacent to Manzanita Avenue) are expected to be exposed to traffic noise levels up to 71 dB Ldn, and require additional noise mitigation measures.

Table IS-11 shows the results of both exterior and interior noise calculations for a third floor end unit closest to Manzanita Avenue, which has a noise exposure to two wall facades. The exterior wall parallel to Manzanita Avenue was analyzed for a noise level exposure of 71 dB L_{dn}, and the perpendicular exterior wall was analyzed for a noise level exposure of 69 dB L_{dn}. The results of the predictive analysis indicate that the interior noise levels for a typical second or third floor unit at the project site will comply with the Sacramento County interior noise level criterion of 45 dB Ldn, provided that the windows and doors on the parallel and perpendicular sides of the second and third floor facades facing Manzanita Avenue of the Block A and Block B buildings have an STC rating of 30.

Table IS-11 Calculated Exterior and Interior Noise Levels

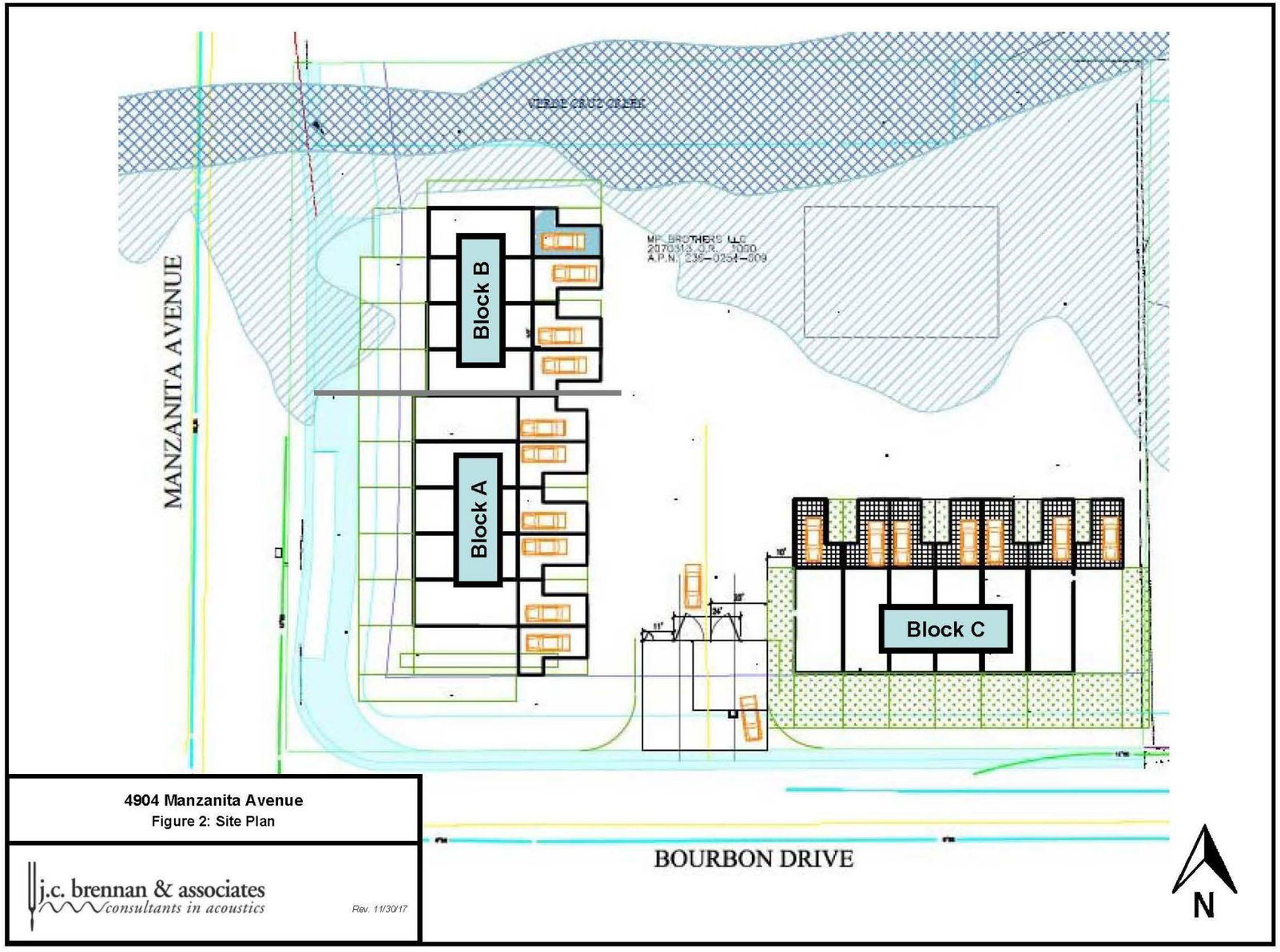
Room	Exterior Noise Levels			Interior Noise Levels	
	Parallel Wall Exterior	Perpendicular Wall Exterior	Cumulative Exterior	Cumulative Interior	NLR
Living / Bedroom	71 dBA	69 dBA	73 dBA	44 dB DNL*	27 dB

Appendix D shows the results of the Interior Calculation Model.
Source: j.c. brennan & associates, Inc., 2017
*Results include STC 30 windows.

CONCLUSION

Standard residential construction (stucco siding, windows with a Sound Transmission Class (STC) rating of STC-27, door weather-stripping, exterior wall insulation, composition plywood roof), results in an exterior to interior noise reduction of at least 25 dB with windows closed and approximately 15 dB with windows open. Therefore, standard construction practices would not be adequate for this development. In order to satisfy Sacramento County 45 dBA L_{dn} interior noise level standard with a margin of safety, construction upgrades that include windows and doors on the parallel and perpendicular sides of the second and third floor facades facing Manzanita Avenue of Block A and Block B buildings shall have an STC rating of 30. In addition, air conditioning shall be provided for all units throughout the development so that windows and doors can be kept closed as desired for acoustical isolation. These measures have been incorporated into Mitigation Measure B for this project. Upon compliance with the mitigation, the interior and exterior noise levels of both the 2nd and 3rd floor facades of Block A and Block B will be in compliance with the Sacramento County General Plan 45 dB L_{dn} interior noise level standard. Impacts related to noise are considered ***less than significant with mitigation***.

Plate IS-7: Noise Study Site Plan



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 stormwater 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;
- 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?

FLOODPLAIN AND FLOODING

The project site is located within an area identified on the FEMA FIRM Panel Number 06067C0098H as "Zone AE," 100-year floodplain. Flood Zone AE is defined as a "special flood hazard area" which has a 1% annual flood risk, or a 26% chance of flooding over a 30-year timeframe. This 1% probability is FEMA's base flood or 100-year flood value. This flood zone is generally an area where flood risks are very high and flooding can happen once every 100 years. Flood Zone AE has a high flooding risk due to low elevations and proximity to floodplains, lakes and rivers.

Verde Cruz Creek (intermittent channel) is located along the northern portion of the project site and conveys urban and residential runoff from the east through the property before running under Manzanita Avenue through a 12" box culvert (Plate IS-8). During rain events, runoff water from streets and adjacent residential neighborhoods flows into Verde Cruz Creek, and then continues north and west to Arcade Creek approximately 0.8 miles northwest of the subject property (Plate IS-9). Approximately 100-feet downstream from the eastern property boundary, the flow transitions to the north or right bank side and continues along the north side an additional 200-feet where it overtops Manzanita Avenue. The ground on the south side of Verde Cruz Creek is above the 100-year water surface elevation for at least 100-feet upstream of Manzanita Avenue.

DRAINAGE

Watermark Engineering, prepared three separate preliminary drainage analysis dated 4/8/19 & 11/26/18 (Appendix B). The analysis submitted in April 2019, provides information to support Low Impact Development (LID) and Water Quality (WQ) facilities for the proposed project (Plate IS-9). The analysis dated 11/26/18 addresses the floodplain impacts of the proposed project.

Proposed Parcels 1, 2 and 3 will encroach into the 100 year floodplain. However, the development of the parcels will be designed to drain into a common planter that will include a bioretention area (Plate IS-8). The configuration of the proposed bioretention area will have eight (8) inches of available ponding and an underdrain 24 inches deep. The planters will vary in length and all but one will be ten (10) feet wide. The planter walls will be six (6) inches thick and therefore, the bioretention area will be nine (9) feet wide. The required bioretention areas will be 13 feet in length. In order to satisfy the requirements, the project will have a bioretention area of 2,000 square feet, a ponding depth of 10 inches and an underdrain 24 inches deep.

Department of Water Resources staff (Durkee) indicated in correspondence dated February 15, 2022 a project design-level (Level 4) drainage study will be required. The study will be required to continue to demonstrate the project will not adversely impact the FEMA floodplain and floodway. An extension of the pipe system in Bourbon Drive and removal of the existing system in Manzanita Avenue, including a new outfall into the creek will be required for this project. According to the preliminary drainage plan submitted by the applicant (Plate IS-9), there are two new outfall options into Verde Cruz Creek. The flow will be directed to either outfall 1 or outfall 2, depending on the configuration of the bioretention area. The outfall locations consist of an existing culvert just upstream of Manzanita Avenue (option 2) or at a vertical concrete structure near the upstream end of the property (option 1). The exact location of the outfall will not be determined until the Level 4 drainage study has been reviewed and approved. Since work will be occurring within the creek with the development of the new outfall, mitigation measures have been added for compliance with the Clean Water Act Sections 404 and 401.

Compliance with DWR's conditions of approval as outlined in the February 15, 2022 correspondence will ensure that environmental impacts related to drainage are considered ***less than significant***.

Plate IS-8: Preliminary Grading Plan

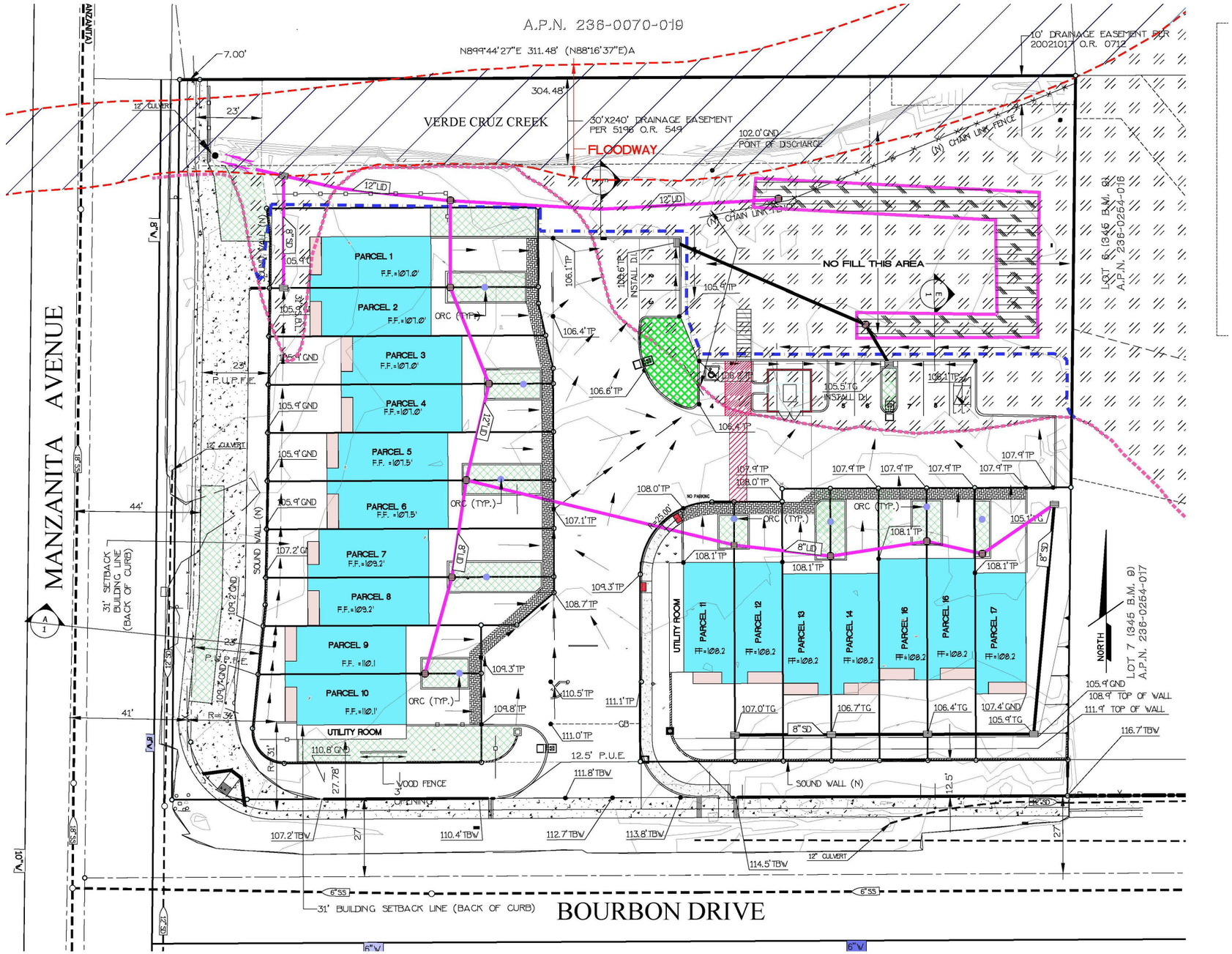
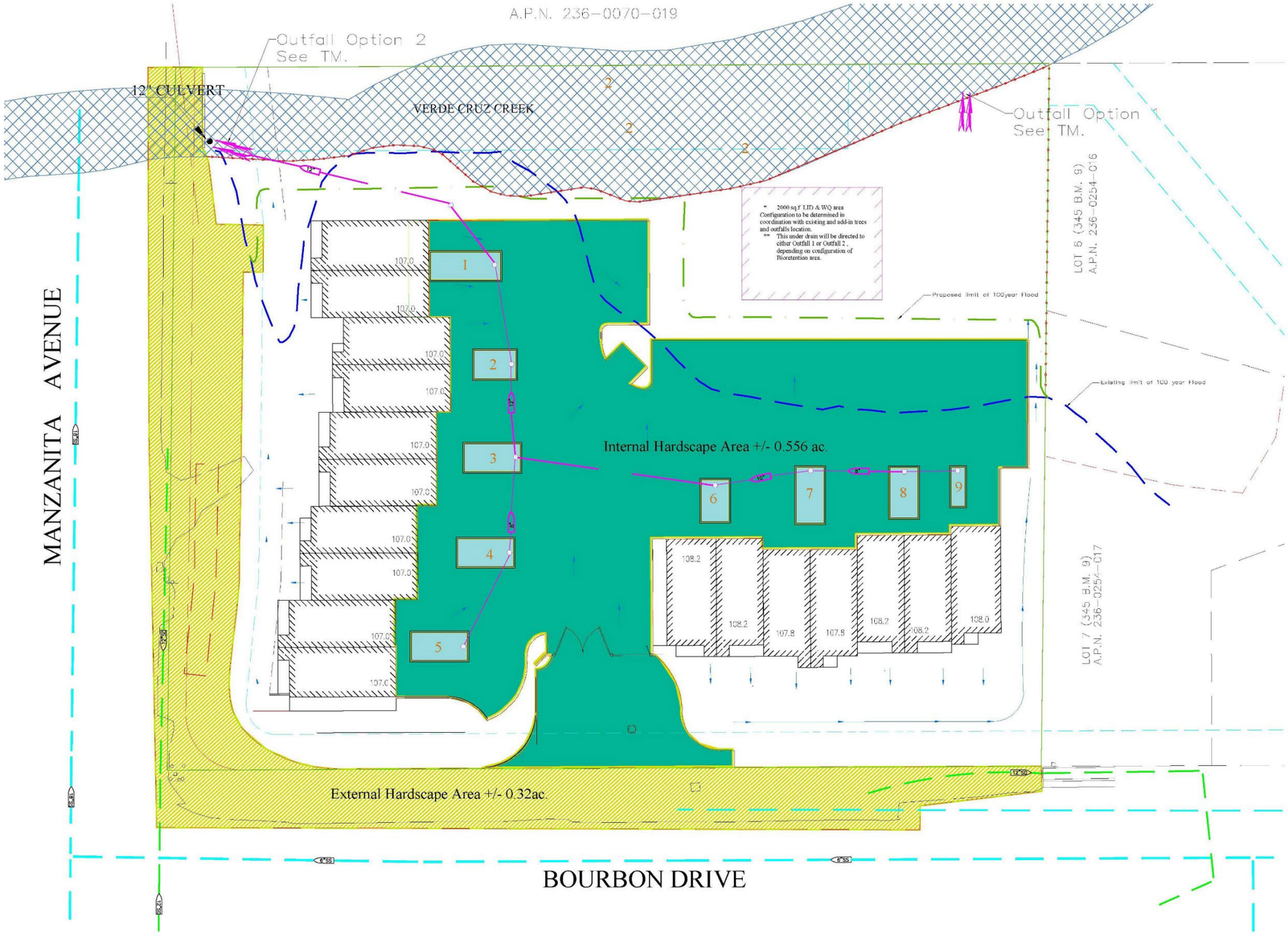
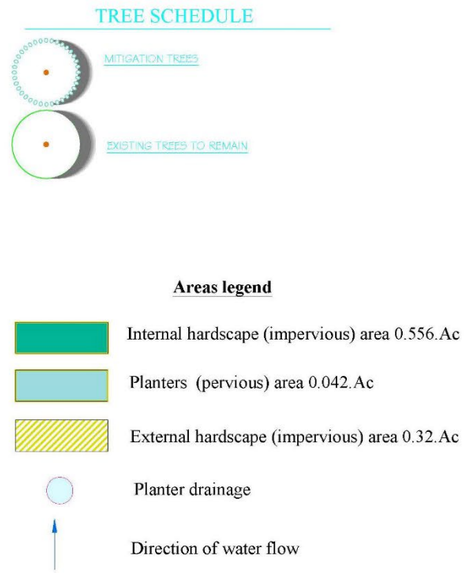


Plate IS-9: Preliminary Drainage Plan





WATER QUALITY

The following discussion describes the Stormwater Ordinance, best management practices for erosion control, and design requirements to prevent and manage stormwater runoff. Grading for the proposed infrastructure improvements and the issuance of a building permit is dependent on adherence with these measures.

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

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

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

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

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

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

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

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

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

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

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

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

OPERATION: STORMWATER RUNOFF

Development and urbanization can increase pollutant loads, temperature, volume and discharge velocity of runoff over the predevelopment condition. The increased volume, increased velocity, and discharge duration of stormwater runoff from developed areas has the potential to greatly accelerate downstream erosion and impair stream habitat in natural drainage systems. Studies have demonstrated a direct correlation between the

degree of imperviousness of an area and the degradation of its receiving waters. These impacts must be mitigated by requiring appropriate runoff reduction and pollution prevention controls to minimize runoff and keep runoff clean for the life of the project.

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

The County requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

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

https://waterresources.saccounty.gov/stormwater/Pages/default.aspx

https://www.beriverfriendly.net/new-development/

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

Biological Resources

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

- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies.
- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community.
- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species.
- Adversely affect or result in the removal of native or landmark trees.

WETLANDS/WATERS OF THE US

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

Wetlands are regulated by both the Federal and State government, pursuant to the Clean Water Act Section 404 (federal) and Section 401 (state). The United States Army Corps of Engineers (USACE) is generally the lead agency for the federal permit process, and the Regional Water Quality Control Board (RWQCB) is generally the lead agency for the state permit process. The Clean Water Act protects all "navigable waters", which are defined as traditional navigable waters that are or were used for commerce, or may be used for interstate commerce; tributaries of covered waters; and wetlands adjacent to covered waters, including tributaries. Isolated wetlands, that is, those wetlands that are not hydrologically connected to other "navigable" surface waters (or their tributaries), are not considered to be subject to the Clean Water Act.

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

The Clean Water Act establishes a "no net" loss" policy regarding wetlands for the state and federal governments, and General Plan Policy CO-58 establishes a "no net loss" policy for Sacramento County. Pursuant to these policies, any wetlands to be excavated or filled require 1:1 mitigation, and construction within the wetlands cannot take place until the appropriate permit(s) have been obtained from the Army Corps, the U.S. Fish and Wildlife Service (USFWS), the Regional Water Board, the California Department of Fish and Wildlife and any other agencies with authority over surface waters. Any loss of delineated wetlands not mitigated for through the permitting process must be mitigated, pursuant to County policy. Appropriate mitigation may include establishment of a conservation easement over wetlands, purchase of mitigation banking credits, or similar measures.

PROJECT IMPACTS

Area West Environmental, Inc. conducted a wetland delineation of aquatic resources within the subject property in May of 2018 (Appendix C). Preliminary wetland mapping was obtained from the U.S. Fish and Wildlife Service National Wetlands Inventory (NWI). The report identified a total of 0.088 acres or 277 square feet of aquatic resources in the Project area (Verde Cruz Creek) that potentially qualify as waters of the U.S. and/or waters of the State (Plate IS-10) & (Plate IS-11). Waters of the U.S. on the site are subject to regulatory jurisdiction by both the USACE and the Central Valley Regional Water Quality Control Board (CVRWQCB).

Verde Cruz Creek transverses the northern portion of the site, running east-west until it continues through a 12" box culvert underneath Manzanita Avenue. The area along this portion of the creek is unvegetated, highly eroded, steep bank along southern side of the channel and gradually sloped bank with dominant non-native herbaceous vegetation along bank and bench of northern side of channel. There is a steep bank along the southern side of the channel with a gradually sloped bank dominant with non-native herbaceous vegetation. Verde Cruz Creek is an urban creek with apparent high winter flows and low summer flows (likely from residential runoff) with a sandy-silt bottom with cobble ~1-inch average diameter. Along the northern side of the channel, the creek supports primarily herbaceous and some vine/shrub species such as white-flowered onion (Allium triquetrum) and Himalayan blackberry (Rubus armeniacus). The parcel generally slopes from the south to the north and consists of blue oak woodland.

The development will occur within 50-feet of Verde Cruz Creek in order to install the appropriate outfall location for drainage purposes. Therefore, mitigation has been included such that for work proposed within the vicinity of the jurisdictional aquatic features will require either a 50-foot setback from delineated features, or submittal of compliance with the Clean Water Act through the submittal of permits issued by the USACE and RWQCB. With mitigation impacts are ***less than significant***.

Plate IS-10 Aquatic Resources Delineation

Plate IS-11 Riparian Corridor

Photo Point 1. View of Verde Cruz Creek – Intermittent Channel, downstream view towards Manzanita Avenue (facing northwest). Taken on May 10, 2018.

Photo Point 2. View of Verde Cruz Creek – Intermittent Channel, upstream view (facing northeast). Taken on May 10, 2018.

Photo Point 3. View just above south bank of Verde Cruz Creek – Intermittent Channel, representative of Blue Oak Woodland vegetation community (facing east). Taken on May 10, 2018.

Photo Point 4. View of southeast corner of Survey Area (facing southeast). Taken on May 10, 2018.

Photo Point 5. View of open non-native grassland area within Blue Oak Woodland (facing east). Taken on May 10, 2018.

Photo Point 6. View of southern boundary of Survey Area (facing southeast). Taken on May 10, 2018.

Special Status Species

The likelihood of a special status species to be present on the project site was determined using the technical studies/documents listed above, and topical literature as cited. Species considered for presence are those species with modeled habitat identified in the SSHCP and species considered with potential occurrence as indicated on the official USFWS species list, CNDDB quad queries (Citrus Heights, Pleasant Grove, Rocklin, Roseville, Folsom, Buffalo Creek, Carmichael, Sacramento East and Rio Linda US Geological Survey 7.5 minute quadrangles), CNPS queries. This is the basis for species outlined in Table IS-12 and Table IS-13, which report the likelihood of species occurrence based on habitat presence either on the site or in proximity of the site, survey results (if any), and nearby recorded species occurrences. Likelihood of occurrence is rated as Not Expected to Occur, Could Occur, and Known to Occur, which are defined as:

> Not Expected to Occur: Species is unlikely to be present on the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
>
> Could Occur: Suitable habitat is available on the project site; however, there are little to no other indicators that the species might be present.
>
> Known to Occur: The species, or evidence of its presence, was observed on the project site during project surveys, or was otherwise documented.

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

Special-Status Plants

Table IS-12 provides a list of the special-status plant species with potential to occur based upon the available data from USFWS' IPaC, CNNDB and CNPS. The table describes their regulatory status, habitat, and potential for occurrence on the project site. Rationale for potential for occurrence was taken from the project's biological report prepared by Area West Environmental. Sanford's arrowhead is the only plant species with a potential to occur onsite due to the habitat characteristics. However, Sanford's arrowhead was not observed during surveys conducted within the bloom period for this species. Therefore, there are no special-status plants present in the project area and no impacts to special-status plants that would result from the proposed project.

Special Status Wildlife Species

Table IS-13 provides a list of the special-status wildlife species with potential to occur based upon the available data from USFWS' IPaC, CNNDB and Area West Environmental biological report (Appendix D). The table describes their regulatory status, habitat, and potential for occurrence on the project site.

Table IS-12: Special Status Plant Species Matrix

Species	Legal Status[1]		Habitat[1]	Potential for Occurrence
	Federal/State	CNPS		
Big-scale balsamroot (*Balsamorhiza macrolepis*)	—	1B.2	Serpentine soils in chaparral, cismontane woodland, and valley and foothill grassland from 295 – 5,102 feet (90 –1,555 meters).	Unlikely to occur. Project area is outside of the elevational range of this species and no appropriate habitat is present.
Hispid bird's beak (*Chloropyron molle*)	—	1B.1	Alkaline soils in meadows and seeps, playas, and valley and foothill grassland. 3 – 509 feet (1 – 155 meters).	Unlikely to occur; no suitable habitat is present.
Dwarf Downingia (*Downingia pusilla*)	—	2B.2	Vernal pools in valley and foothill grasslands. 3 – 1,460 feet (1 – 445 meters).	Unlikely to occur; no suitable habitat is present.
Boggs Lake hedge-hyssop (*Gratiola heterosepala*)	—/CE	1B.2	Clay soils in marshes and swamps (lake margins) and vernal pools. 33 – 7,792 feet (10 – 2,375 meters).	Unlikely to occur; no suitable habitat is present.
Ahart's dwarf rush (*Juncus leiospermus*)	—	1B.2	Mesic soils in valley and foothill grasslands, including wetland riparian. 98 – 751 feet (30 – 229 meters).	Unlikely to occur; no suitable habitat is present.
Red Bluff dwarf rush (*Juncus leiospermus*)	—	1B.1	Vernal pools; vernally mesic soils in chaparral, cismontane woodland, meadows and seeps, and valley and foothill grasslands. 115 – 4,101 feet (35 – 1,250 meters).	Unlikely to occur; no suitable habitat is present.
Legenere (*Legenere limosa*)	—	1B.1	Vernal pools. 3 – 2,887 feet (1-880 meters).	Unlikely to occur; no suitable habitat is present.
Pincushion navarretia (*Navarretia myersii*)	—	1B.1	Often acidic soils in vernal pools. 66 – 1,083 feet (20 - 330 meters).	Unlikely to occur; no suitable habitat is present.
Slender Orcutt Grass (*Orcuttia tenuis*)	FT/CE	1B.1	Often gravelly soil in vernal pools. 115 - 5,775 feet (35 –1,760 meters).	Unlikely to occur; no suitable habitat is present.
Sacramento Orcutt Grass (*Orcuttia viscida*)	FE/CE	1B.1	Vernal pools. 98 – 328 feet (30 – 100 meters).	Unlikely to occur; no suitable habitat is present.
Sanford's arrowhead (*Sagittaria sanfordi*)	—	1B.2	Shallow, freshwater marshes and swamps. 0 – 2,133 feet (0 – 650 meters).	Unlikely to occur. Suitable habitat is present, but the species was not observed during surveys conducted during the appropriate identification period.

[1]Status explanations:
-- = no listing.

Federal
FE = listed as endangered under the federal Endangered Species Act.
FT = listed as threatened under the federal Endangered Species Act.

State
CE = listed as endangered under the California Endangered Species Act.

California Native Plant Society Rare Plant Rank (formerly known as CNPS lists) 1B = Rank 1B species: rare, threatened, or endangered in California and elsewhere.
2B = Rank 2B species: rare, threatened, or endangered in California but more common elsewhere.
0.1 = Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat).
0.2 = Moderately threatened in California (20%-80% occurrences threatened/moderate degree and immediacy of threat).
0.3 = Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known).

Source: CNPS 2018; CNDDB 2018; USFWS 2018, and Calflora 2017.

Table IS-13: Special Status Wildlife Species Matrix

Species	Legal Status[1]		Habitat[1]	Potential for Occurrence
	Federal	State		
Vernal pool fairy shrimp (*Branchinecta lynchi)*	FT	—	Common in vernal pools and seasonal wetlands; also found in sandstone rock outcrop pools.	Unlikely to occur; no suitable habitat is present.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus)*	FT	—	Dependent on elderberry shrubs (host plant) as a food plant; potential habitat is shrubs with stems 1 inch in diameter within Central Valley.	Unlikely to occur; no suitable habitat is present.
Vernal pool tadpole shrimp (*Lepidurus packardi)*	FE	—	Vernal pools, vernal lakes, and other seasonal wetlands.	Unlikely to occur; no suitable habitat is present.
California tiger salamander (*Ambystoma californiense)*	FT	CT	Breeds in temporary ponds formed from rain associated with annual grassland and from 10– 3,200 feet above mean sea level. May also occur in hardwood forest, but less common. Adult life is mostly subterranean in burrows, rock cracks and other structures. Seasonal movements associated with breeding are usually up to 1.25 miles.	Unlikely to occur; no suitable habitat is present.
California red- legged frog (*Rana draytonii)*	FT	SSC	Permanent and semi-permanent aquatic habitats, such as creeks and cold water ponds, with emergent and submergent vegetation; may aestivate in rodent burrows or cracks during dry periods. This species has been known to move overland without regard for topography or vegetation corridors up to a distance of 2 miles.	Unlikely to occur; no suitable habitat is present.
Western spadefoot *(Spea hammondii)*	—	SSC	Pools in intermittent streams, cattle ponds, and seasonal wetlands, such as vernal pools in annual grasslands and oak woodlands.	Unlikely to occur. Isolated oak woodland habitat and the highly urbanized creek are not expected to provide suitable habitat for this species.
Western pond turtle *(Actinemys marmorata)*	—	SSC	Thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches with aquatic vegetation, below 6,000 feet in elevation. Require soil up to 4 inches deep for egg-laying. Females will travel overland up to approximately 325 feet to lay eggs.	Potential for occurrence. Low quality habitat is present for this species in Verde Cruz Creek and nearby uplands (north bank only) in the Project area.
Giant garter snake *(Thamnophis gigas)*	FT	CT	Sloughs, canals, and other small water-ways where there is a prey base of small fish and amphibians; require grassy banks and emergent vegetation for basking and areas of high ground protected from flooding during winter.	Unlikely to occur; no suitable habitat is present.
Tricolored blackbird (*Agelaius tricolor)*	—	CT	Nests in dense colonies in emergent marsh vegetation, such as tules and cattails, or upland sites with blackberries, nettles, thistles, and grainfields; nesting habitat must be large enough to support 50 pairs; probably requires water at or near the nesting colony; requires large foraging areas, including marshes, pastures, agricultural wetlands, dairies, and feedlots, where insect prey is abundant.	Unlikely to occur; no suitable habitat is present.
Grasshopper Sparrow (*Ammodramus savannarum)*	—	SSC	Dry, dense grasslands, especially those with a variety of grasses and tall forbs and scattered shrubs for singing perches. In southern California occurs mainly on hillsides and mesas in coastal districts, but has bred up to 5000 feet in San Jacinto Mts.	Unlikely to occur; no suitable habitat is present.

Species	Legal Status[1]		Habitat[1]	Potential for Occurrence
	Federal	State		
Golden eagle (*Aquila chrysaetos)*	—	FP	Cliffs and escarpments or tall trees for nesting; annual grasslands, chaparral, and oak wood-lands with plentiful medium and large-sized mammals for prey. Uses rolling foothills and mountain terrain, including steep terrain in stream cut canyons and slopes.	Unlikely to occur; no suitable habitat is present.
Burrowing owl *(Athene cunicularia)*	—	SSC	Open annual grasslands or perennial grasslands, deserts, and scrublands characterized by low- growing vegetation. Dependent upon burrowing mammals (especially California ground squirrel) for burrows.	Unlikely to occur; no suitable habitat is present.
Swainson's hawk *(Buteo swainsoni)*	—	CT	Nests in solitary trees or riparian habitats; nests located adjacent to suitable foraging habitat. Forages in open grasslands, irrigated pastures, and grain fields.	Unlikely to occur. Suitable riparian nesting habitat is present, but nesting habitat is located far from suitable open foraging habitat. No nests were observed during survey conducted in the nesting season.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis)*	FT	CE	In California, prefers riparian woodlands comprised of various compositions with a dense understory along slow moving watercourses. Typically requires expansive riparian habitat of 25– 99 acres of habitat for breeding.	Unlikely to occur; no suitable habitat is present.
White-tailed kite *(Elanus leucurus)*	—	FP	Agricultural lands and open stages of most herbaceous habitats. Nests in dense oak, willow, or other tree stands. Forages by hovering over grasslands and catching small mammals such as voles.	Potential for occurrence. This species could nest in the trees within the Project area. Foraging habitat is limited given the lack of open grassland within the Project area.
California black rail *(Laterallus jamaicensis coturniculus)*	—	CT/FP	Inhabits saltwater, brackish, and freshwater marshes. Nests in high areas of salt marshes, shallow freshwater marshes (less than 1.2 inches deep), and wet meadows.	Unlikely to occur; no suitable habitat is present.
Song sparrow (Modesto Population) *(Melospiza melodia)*	—	SSC	Emergent freshwater marshes and riparian willow thickets. Nests in riparian forests of valley oak with a sufficient understory of blackberry, along vegetated irrigation canals and levees, and in recently planted valley oak restoration sites.	Unlikely to occur; no suitable habitat is present.
Purple martin *(Progne subis)*	—	SSC	Uses tree cavities in woodlands for nesting; also nests in vertical drainage holes under elevated freeways and highway bridges; open areas required for feeding.	Potential for occurrence. This species could nest in tree cavities, if present, and forage in the blue oak woodland within the Project area.
Bank swallow *(Riparia riparia)*	—	CT	Nests in bluffs or banks, usually adjacent to water, where the soil consists of sand or sandy loam to allow digging.	Unlikely to occur. No potential habitat in the Project Area.
Pallid bat (*Antrozous pallidus)*	—	SSC	Rocky outcrops, cliffs, and crevices for roosting; access to open habitats required for foraging.	Potential for foraging in Project area. Unlikely to roost as no appropriate habitat is present.

Species	Legal Status[1]		Habitat[1]	Potential for Occurrence
	Federal	State		
Ringtail (*Bassariscus astutas)*	—	FP	Riparian forests, chaparral, scrub, oak woodlands, and rocky hillsides with crevices and tree hollows 3 inches in diameter or greater. Avoids open space and moves from tree to tree or along structures. Omnivorous and will feed on berries such as toyon or mistletoe leaves and berries and will vary depending on the seasons and food availability.	Unlikely to occur. Oak woodland habitat is isolated by surrounding urban areas and riparian vegetation corridor is not sufficient to support ringtail population in the Project Area.
American badger *(Taxidea taxus)*	—	SSC	Permanent resident of most open stage shrub, forest and herbaceous habitats with friable soils for digging burrows. Badgers feed primarily on fossorial species, such as burrowing mammals like pocket gophers and ground squirrels.	Unlikely to occur. No suitable habitat is present.
Delta Smelt (*Hypomesus transpacificus)*	FT	CE	Euryhaline (fresh and brackish water) estuary channels; spawning habitats consist of side channels and sloughs in the middle reaches of the Delta.	Unlikely to occur. No suitable habitat is present.
Central Valley Steelhead DPS (*Oncorhynchus mykiss irideus)*	FT	—	Cool, rocky streams with moderate size gravel for spawning and shade trees for cover and rearing.	Unlikely to occur. No suitable habitat is present.

[1] Status explanations:

-- = no listing.

Federal
FE = listed as endangered under the federal Endangered Species Act.
FT = listed as threatened under the federal Endangered Species Act.

State
CE = listed as endangered under the California Endangered Species Act.
CT = listed as threatened under the California Endangered Species Act.
SSC = state species of special concern
FP = listed as fully protected by the state of California.

Source: CNDDB 2018; USFWS 2018

As noted in Table IS-13, several special-status species have the potential to occur in the project site. Trees and shrubs in the Project area represent potential breeding and/or foraging habitat for some species of special-status and migratory birds, such as white-tailed kite and purple martin. Additionally, the proposed Project area also contains potential foraging habitat for numerous birds and raptors protected under the Migratory Bird Treaty Act.

Verde Cruz Creek and its banks provide suitable (although low quality) aquatic and upland habitat for the western pond turtle, a state species of special concern. Construction of the proposed Project could result in both direct and indirect impacts to the western pond turtle. Direct impacts to western pond turtles resulting from ground disturbance, equipment use, and other proposed Project activities would be avoided through implementation of Mitigation Measures.

Western Pond Turtle

The western pond turtle (*Emys marmorata*)[1], is listed as a California Species of Special Concern by the California Department of Fish and Wildlife. According to the Fish and Wildlife Life History Account for the species, the western pond turtle is an aquatic turtle that usually leaves the aquatic site to reproduce, to aestivate, or to overwinter. Western pond turtles require some slack- or slow-water aquatic habitat. High-gradient streams with minimal cover or basking habitat are not suitable. In pond environments the species typically only leaves the water to reproduce, whereas in stream environments the turtles more commonly leave the water to aestivate or overwinter, in addition to leaving for reproduction. Turtles leave the water to overwinter in October or November, and typically become active in March or April. Mating typically occurs in late April or early May, but may occur year-round. Most egg-laying occurs in May or June, but may occur as early as April or as late as August. The hatchlings remain in the nest over the winter, and emerge in the spring. Suitable nesting locations have dry soils (usually in a substrate with a high clay or silt fraction) on a slope that is unshaded and may be at least partially south-facing. The nest site can be up to 1,300 feet from the aquatic habitat, but it is more typical for the nest to be within 650 feet of aquatic habitat. The Life History Account conservatively recommends a buffer of 1,650 feet to ensure that neither adults nor nests will be impacted.

The California Fish and Wildlife has not published mitigation or other regulatory guidance for the treatment of impacts to this species. As a result, mitigation is focused on preventing construction activities from resulting in direct mortality of a western pond turtle. The developer will be required to perform surveys 24-hours prior to ground-disturbing

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

activity to ensure that there are no western pond turtles within or near the construction area. Impacts to western pond turtle are ***less than significant with mitigation***.

SWAINSON'S HAWK

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

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

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

NESTING HABITAT IMPACT METHODOLOGY

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, CDFW recommends utilizing the methodology set forth in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). The document recommends that surveys be conducted for the two survey periods immediately prior to the start of construction. The five survey periods are defined by the timing of migration, courtship, and nesting in a typical year (Table IS-14). Surveys should extend a ½-mile radius around all project activities, and if active nesting is identified, CDFW should be contacted.

Table IS-14: Recommended Survey Periods for Swainson's Hawk (TAC 2000)

Period #	Timeframe	# of surveys required	Notes

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

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

DISCUSSION OF PROJECT IMPACTS

The project site contains mature trees that could provide adequate nesting habitat for Swainson's hawk, therefore, preconstruction surveys for nesting hawks are necessary prior to construction. The purpose of the survey requirement is to ensure that construction activities do not agitate nesting hawks, potentially resulting in nest abandonment or other harm to nesting success. The CDFW TAC 2000 methodology outlines procedures for conducting multiple bird surveys. Due to the highly urbanized nature of the project site and limited tree canopy, a single survey is adequate. If Swainson's hawk nests are found, the developer is required to contact CDFW to determine what measures need to be implemented in order to ensure that nesting hawks remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. According to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000), the mitigation described above will ensure that impacts to nesting Swainson's hawk will be ***less than significant***.

MIGRATORY NESTING BIRDS

The Migratory Bird Treaty Act of 1918, which states "unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(19) of the Federal Endangered Species Act defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take." To avoid take of nesting migratory birds, mitigation has been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded.

Large trees on the property and within the project vicinity provide potential nesting habitat for migratory birds. To avoid take of nesting migratory birds, mitigation has been included either to require that activities occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. Impacts to migratory birds are ***less than significant.***

NESTING BIRDS OF PREY

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

Raptors within the Sacramento region include tree-nesting species such as the red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as "special animals" due to concerns over nest disturbance: Cooper's hawk, sharp-shinned hawk, golden eagle, northern harrier, and white-tailed kite. Due to the project site containing numerous trees, suitable tree and/or ground-nesting habitat is located on the subject property.

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

NATIVE TREES

Sacramento County has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12

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

The Sacramento County General Plan Conservation Element policies CO-138 and CO-139 also provide protections for native trees:

> CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson's hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.
>
> CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

Native trees other than oaks include Fremont cottonwood (Populus fremontii), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*, which is also a List 1B plant), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis),* gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

SITE SPECIFIC ANALYSIS - NATIVE TREES

Arbitect Arboriculture and Land Architecture prepared the arborist report for the property in July of 2018 including addendums in September of 2019 and June of 2022 (Appendix E). The inventory identified the species, size, and location of onsite and overhanging offsite trees. The survey identified a total of 89 native oaks measuring a minimum of 4 inches in diameter at breast height (DBH) within the project site (Appendix F). The applicant provided a tree exhibit indicating the location of each tree identified in the arborist report and whether the tree will be staying in place, relocated, or removed due to the proposed project (Plate IS-12).

ONSITE NATIVE TREE REMOVAL

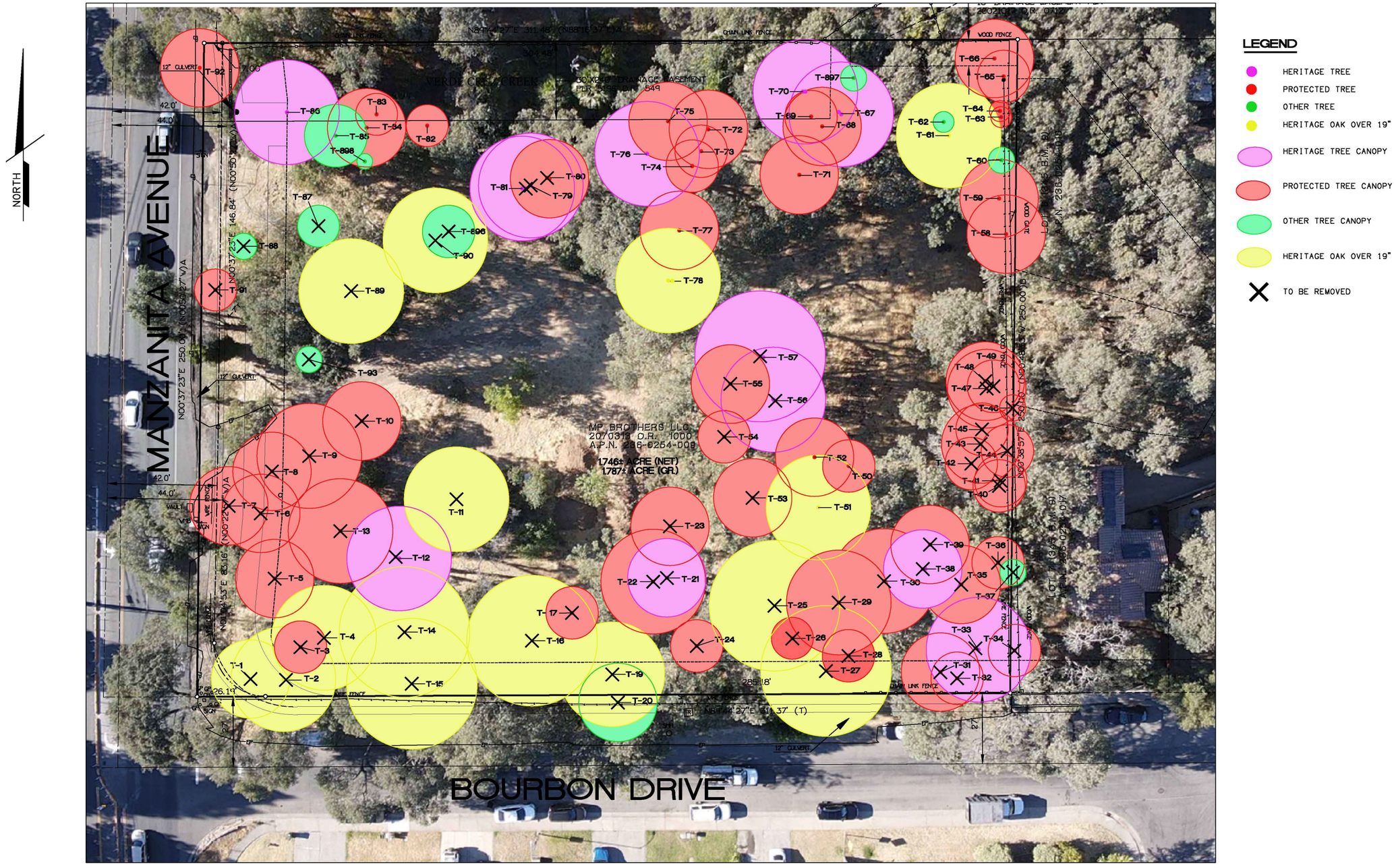
A total of 31 native oak trees (#1, #9, #11, #12, #13, #14, #17, #19, #21, #22, #25, #28, #29, #30, #35, #38, #39, #40, #41, #43, #44, #45, #47, #48, #49, #53, #55, #57, #89, #90,

#91) (537 aggregate diameter inches) are being removed in order to accommodate the development and will require mitigation (Appendix F). The removal of the trees requires mitigation that will be compensated for in-kind on an inch-for-inch basis for the removal of individual trees.

A total of 29 native oak trees (#2, #3, #4, #5, #6, #7, #8, #10, #15, #16, #18, #23, #24, #26, #27, #31, #32, #33, #34, #36, #37, #42, #46, #54, #56, #79, #80, #81, #93) (450 aggregate diameter inches) have been proposed for removal due to defects and/or have a dbh of less than 6" and do not require mitigation for removal (Appendix G).

Mitigation is required to compensate for the full removal of 537-inches dbh of native oak trees on-site. Off-site native oak trees overhanging or adjacent to the project site may be impacted by construction equipment during project construction. Mitigation has been included to protect trees during construction, including removal of debris. Standard mitigation for native tree removal and protection is included to ensure impacts related to native oak trees from the proposed project are ***less than significant with mitigation***.

Plate IS-12: Tree Locations



Non-Native Trees and Tree Canopy

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

> CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.
>
> CO-146. If new tree canopy cannot be created onsite to mitigate for the non-native tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.
>
> CO-147. Increase the number of trees planted within residential lots and within new and existing parking lots.
>
> CO-149. Trees planted within new or existing parking lots should utilize pervious cement and structured soils in a radius from the base of the tree necessary to maximize water infiltration sufficient to sustain the tree at full growth.

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. The list includes more than seventy trees. Policy CO-146 references the Greenprint program, which is run by the Sacramento Tree Foundation and has a goal of planting five million trees in the Sacramento region.

The project site contains seven (7) non-native trees, identified in Table IS-15 below. Four of the non-native trees are proposed for removal and no mitigation is required due to the condition of these trees. Three (3) of the non-native trees will remain on the property. Impacts associated with non-native tree canopy removal are ***less than significant***.

Table IS-15: Non-Native Trees On-Site for Removal

Tree #	Common Name	Scientific Name	DBH (Inch)	Canopy Radius (Feet)	Health/Structure Condition	Action	Mitigation
20	Mulberry	*Morus spp.*	14”	15	2 (Fair); Many dead limbs	Proposed for Removal.	No mitigation required due to condition of tree.
87	Coast Redwood	*Seqouia sempervirens*	15”	8	2.5 (Fair);	Proposed for Removal.	No mitigation required due to condition of tree.
88	Pecan	*Carya illinoinesis*	½”	5	2 (Fair)	Proposed for Removal.	No mitigation required due to size of tree.

Tree #	Common Name	Scientific Name	DBH (Inch)	Canopy Radius (Feet)	Health/Structure Condition	Action	Mitigation
896	Australian Pine	*Casuarina spp.*	12"	10	2 (Fair)	Proposed for Removal.	No mitigation required due to condition of tree.

CULTURAL RESOURCES

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

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

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

In addition to historically significant resources, an archeological site may meet the definition of a "unique archeological resource" as defined in PRC Section 21083.2(g). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, mitigation measures shall be required (PRC Section 21083.2 (c)). CEQA Guidelines Section 15064.5 (e) outlines the steps the lead agency shall take in the event of an accidental discovery of human remains in any location other than a dedicated cemetery.

CULTURAL SETTING

A Cultural Resource Assessment was prepared for the project by PAR Environmental Services, dated March 13, 2019. The following information and analysis is based on this report. Historically, the area was associated with Rancho Del Paso and Rancho San Juan, which were established in the mid nineteenth century. Historical aerial photographs and USGS topographic maps depict no structures within the area of potential impact.

A search of records and historical information on file at the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) was conducted on March 12, 2029 for the project area and a 1/4-mile buffer. The records

search within the proposed project area contains zero recorded indigenous-period/ethnographic-period resource(s) and zero recorded historic-period cultural resources. Outside the proposed project area, but within the one-quarter-mile radius, the broader search area contains zero recorded indigenous-period/ethnographic-period resource(s) and zero cultural resources. However, one study was conducted within ¼ mile from the project site and identified a single prehistoric resource (CA-SAC-204). This resource is located outside of the area of potential impact but is within the ¼ mile buffer.

CULTURAL RESOURCES PROJECT IMPACTS

After a thorough reconnaissance of the subject property using a close, five meter transect approach and intensive survey, no cultural deposits were noted. The cut bank of Verde Cruz Creek that borders the north end of this parcel was rigorously inspected for prehistoric material with negative results. A sacred lands search was conducted through the Native American Heritage Commission (NAHC) and historical information from the Center for Sacramento History about the proposed project for relevant supplementary information and no replies were received. Overall, there are no known historical and/or archaeological resources on the subject property. However, that does not preclude the possibility that other resources could be uncovered during construction and that the inadvertent discoveries mitigation would apply. Given the extent of known cultural resources and patterns of local history, there is low potential for locating historic-period cultural resources in the immediate vicinity of the proposed project area.

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

TRIBAL CULTURAL RESOURCES

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

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with a cultural value to a California Native American tribe, that is:

  a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

  b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set

forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Under PRC Section 21084.3, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources (21080.3.1(a)).

TRIBAL CULTURAL RESOURCE SETTING

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects on February 25, 2020. Wilton Rancheria indicated that they would like to initiate consultation under AB-52. The United Auburn Indian Community did not request consultation, but asked for the inclusion of inadvertent discovery mitigation measures. On January 23, 2023, another AB-52 package was distributed to the tribes because of revisions to the site plan. Staff did not receive responses to the updated AB-52 request. Therefore, it was concluded that Wilton Rancheria no longer wanted to initiate consultation for the proposed project.

TRIBAL CULTURAL RESOURCES PROJECT IMPACTS

Tribal cultural resources were not identified through consultation under CEQA. With this mitigation for unanticipated discoveries, impacts to tribal cultural resources will be ***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.[2]

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

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

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

Goals in the section on energy focus on increasing energy efficiency and increasing the usage of renewable sources. Actions include implementing green building ordinances and programs, community outreach, renewable energy policies, and partnerships with local energy producers.

Goals in the section on transportation/land use cover a wide range of topics but are principally related to reductions in vehicle miles traveled, usage of alternative fuel types, and increases in vehicle efficiency. Actions include programs to increase the efficiency of the County vehicle fleet, and an emphasis on mixed use and higher density development, implementation of technologies and planning strategies that improve non-vehicular mobility.

Goals in the section on waste include reductions in waste generation, maximizing waste diversion, and reducing methane emissions at Kiefer landfill. Actions include solid waste reduction and recycling programs, a regional composting facility, changes in the waste vehicle fleet to use non-petroleum fuels, carbon sequestration at the landfill, and methane capture at the landfill.

Goals in the section on water include reducing water consumption, emphasizing water efficiency, reducing uncertainties in water supply by increasing the flexibility of the water allocation/distribution system, and emphasizing the importance of floodplain and open

[2] 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 commitment to a Communitywide CAP is identified in General Plan Policy LU-115 and associated Implementation Measures F through J on page 117 of the General Plan Land Use Element. This commitment was made in part due to the County's General Plan Update process and potential expansion of the Urban Policy Area to accommodate new growth areas. General Plan Policies LU-119 and LU-120 were developed with SACOG to be consistent with smart growth policies in the SACOG Blueprint, which are intended to reduce VMT and GHG emissions. This second phase CAP is intended to flesh out the strategies involved in the strategy and framework CAP, and will include economic analysis, intensive vetting with all internal departments, community outreach/information sharing, timelines, and detailed performance measures. County Staff prepared a final draft of the CAP, which was heard at the Planning Commission on October 25, 2021. The CAP was brought to the Board of Supervisors (BOS) as a workshop item on March 23, 2022. The CAP was revised based upon input received from the BOS and a final CAP was brought back before the BOS for approval, on September 27, 2022, but was continued to a future hearing date.

Greenhouse Gas Emissions Thresholds of Significance

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

In April 2020, SMAQMD adopted an update to their land development project operational GHG threshold, which requires a project to demonstrate consistency with CARB's 2017 Climate Change Scoping Plan. The Sacramento County Board of Supervisors adopted the updated GHG threshold in December 2020. SMAQMD's technical support document, "Greenhouse Gas Thresholds for Sacramento County", identifies operational measures that should be applied to a project to demonstrate consistency.

All projects must implement Tier 1 Best Management Practices to demonstrate consistency with the Climate Change Scoping Plan. After implementation of Tier 1 Best Management Practices, project emissions are compared to the operational land use screening levels table (equivalent to 1,100 metric tons of CO2e per year). If a project's operational emissions are less than or equal to 1,100 metric tons of CO2e per year after implementation of Tier 1 Best Management Practices, the project will result in a less than

cumulatively considerable contribution and has no further action. Tier 1 Best Management Practices include:

- BMP 1 – no natural gas: projects shall be designed and constructed without natural gas infrastructure.

- BMP 2 – electric vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards.

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

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

Projects that implement BMP 1 and BMP 2 can utilize the screening criteria for operation emissions outlined in Table IS-16. 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-16.

Table IS-76: SMAQMD Thresholds of Significance for Greenhouse Gases

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

PROJECT IMPACTS

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. The project is within the screening criteria for construction related impacts related to air quality. Therefore, construction-related GHG impacts are considered ***less than significant***.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

The project will implement BMP 1 and BMP 2 in its entirety. As such, the project can be compared to the operational screening table. The operational emissions associated with the project are less than 1,100 MT of CO_2e per year; therefore BMP 3 does not apply. Mitigation has been included such that the project will implement BMP 1 and BMP 2. The impacts from GHG emissions are ***less than significant with mitigation***.

ENVIRONMENTAL MITIGATION MEASURES

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

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

Applicant _____ 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: 45dB INTERIOR NOISE REDUCTIONS

Air conditioning units shall be provided for all units/residences within this development to allow the occupants to close doors and windows as desired for additional acoustical isolation.

Additionally, per Plate IS-7 (Figure 2 of the Noise Report; Appendix A), Buildings Block A & Block B (adjacent to Manzanita Avenue) will be required to install exterior windows and doors on the parallel and perpendicular sides of the second and third floor facades with an STC rating of 30.

MITIGATION MEASURE C: JURISDICTIONAL WATERS PROTECTION AND COMPENSATION

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

A. Where a Section 404 Permit has been issued by the Army Corps of Engineers, or an application has been made to obtain a Section 404 Permit, the Mitigation and Management Plan required by that permit or proposed to satisfy the requirements of the Corps for granting a permit may be submitted for purposes of achieving a no net-loss of surface waters. The required Plan shall be submitted to the Sacramento County Environmental Coordinator, U.S. Army Corps of Engineers, and U.S. Fish and Wildlife Service for approval prior to its implementation.

B. If regulatory permitting processes result in less than a 1:1 compensation ratio for loss of surface waters, the Project applicant shall demonstrate that the surface

waters which went unmitigated/uncompensated as a result of permitting have been mitigated through other means. Acceptable methods include payment into a mitigation bank or protection of off-site surface waters through the establishment of a permanent conservation easement, subject to the approval of the Environmental Coordinator.

C. In areas where wetlands/waters are to be avoided, a 50-foot setback from waters shall be maintained. The Environmental Coordinator will review the proposed plans to ensure that construction will not occur within a 50-foot buffer of jurisdictional waters.

MITIGATION MEASURE D: WESTERN POND TURTLE

To avoid impacts to western pond turtles the following shall apply:

1. Twenty four hours prior to the commencement of ground-disturbing activity (i.e. clearing, grubbing, or grading) suitable habitat within the project area shall be surveyed for western pond turtle by a qualified biologist. The survey shall include aquatic habitat and 1,650 feet of adjacent uplands surrounding aquatic habitat within the project area. The biologist shall supply a brief written report (including date, time of survey, survey method, name of surveyor and survey results) to the Environmental Coordinator prior to ground disturbing activity.
2. Construction personnel shall receive worker environmental awareness training. This training instructs workers how to recognize western pond turtles and their habitat.
3. If a western pond turtle is encountered during active construction, all construction shall cease until the animal has moved out of the construction area on its own or relocated by a qualified biologist. If the animal is injured or trapped, a qualified biologist shall move the animal out of the construction area and into a suitable habitat area. California Fish and Wildlife and the Environmental Coordinator shall be notified within 24-hours that a turtle was encountered.

MITIGATION MEASURE E: SWAINSON'S HAWK NESTING HABITAT

If construction, grading, or project-related improvements are to commence between February 1 and September 15, focused surveys for Swainson's hawk nests shall be conducted by a qualified biologist within a ½-mile radius of project activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). To meet the minimum level of protection for the species, surveys should be completed for the two survey periods immediately prior to commencement of construction activities in accordance with the 2000 TAC recommendations. If active nests are found, CDFW shall be contacted to determine appropriate protective measures, and these measures shall be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, no further mitigation will be required.

MITIGATION MEASURE F: MIGRATORY BIRD NEST PROTECTION

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

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

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

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

MITIGATION MEASURE G: RAPTOR NEST PROTECTION

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

MITIGATION MEASURE H: NATIVE OAK TREE REMOVAL

The removal of 537 inches dbh of native oak trees (#1,#9,#11, #12, #13, #14, #17, #19, #21, #22, #25, #28, #29, #30, #35, #38, #39, #40, #41, #43, #44, #45, #47, #48, #49, #53, #55, #57, #89, #90, #91) shall be compensated for by planting in-kind native trees equivalent to the dbh inches lost, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. On-site preservation of native trees that are less than 6 inches (<6 inches) dbh, may also be used to meet this compensation requirement. Native trees include: valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), Oregon ash

(*Fraxinus latifolia*), western redbud (*Cercis occidentalis),* gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. A total of 537 inches will require compensation.

Equivalent compensation based on the following ratio is required:

- one preserved native tree < 6 inches dbh on-site = 1 inch dbh
- one D-pot seedling (40 cubic inches or larger) = 1 inch dbh
- one 15-gallon tree = 1 inch dbh
- one 24-inch box tree = 2 inches dbh
- one 36-inch box tree = 3 inches dbh

Prior to the approval of Improvement Plans or Building Permits, whichever occurs first, a Replacement Tree Planting Plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the Environmental Coordinator for approval. The Replacement Tree Planting Plan(s) shall include the following minimum elements:

1. Species, size and locations of all replacement plantings and < 6-inch dbh trees to be preserved
2. Method of irrigation
3. If planting in soils with a hardpan/duripan or claypan layer, include the Sacramento County Standard Tree Planting Detail L-1, including the 10-foot deep boring hole to provide for adequate drainage
4. Planting, irrigation, and maintenance schedules;
5. Identification of the maintenance entity and a written agreement with that entity to provide care and irrigation of the trees for a 3-year establishment period, and to replace any of the replacement trees which do not survive during that period.
6. Designation of 20-foot root zone radius and landscaping to occur within the radius of trees < 6 inches dbh to be preserved on-site.

No replacement tree shall be planted within 15 feet of the driplines of existing native trees or landmark size trees that are retained on-site, or within 15 feet of a building foundation or swimming pool excavation. The minimum spacing for replacement native trees shall be 20 feet on-center. Examples of acceptable planting locations are publicly owned lands,

common areas, and landscaped frontages (with adequate spacing). Generally unacceptable locations are utility easements (PUE, sewer, storm drains), under overhead utility lines, private yards of single-family lots (including front yards), and roadway medians.

Native trees <6 inches dbh to be retained on-site shall have at least a 20-foot radius suitable root zone. The suitable root zone shall not have impermeable surfaces, turf/lawn, dense plantings, soil compaction, drainage conditions that create ponding (in the case of oak trees), utility easements, or other overstory tree(s) within 20 feet of the tree to be preserved. Trees to be retained shall be determined to be healthy and structurally sound for future growth, by an ISA Certified Arborist subject to Environmental Coordinator approval.

If tree replacement plantings are demonstrated to the satisfaction of the Environmental Coordinator to be infeasible for any or all trees removed, then compensation shall be through payment into the County Tree Preservation Fund. Payment shall be made at a rate of $325.00 per dbh inch removed but not otherwise compensated, or at the prevailing rate at the time payment into the fund is made.

MITIGATION MEASURE I: CULTURAL RESOURCES UNANTICIPATED DISCOVERIES

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

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

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

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

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

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

MITIGATION MEASURE J: GREENHOUSE GASES

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

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

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

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

MITIGATION MEASURE COMPLIANCE

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is $**8,400**. This fee includes administrative costs of $1,050.00.

2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no

encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

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

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

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. **LAND USE** - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, Carmichael Community Plan, Sacramento County Zoning Code and the Natural Streams (NS) combining zone. See the land use discussion under the environmental effects section above.
b. Physically disrupt or divide an established community?			X		The project will not create physical barriers that substantially limit movement within or through the community. This project proposes a dedicated 30-foot wide private drive off Bourbon Drive.
2. **POPULATION/HOUSING -** Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The 1.75 acre property is zoned RD-10 and allows 10 residential units per acre. Therefore, the maximum density allowed on the subject property is 17.5 dwelling units. The project and the net addition of 17 single-family homes will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations. The project is located within an area designated for urban growth and uses.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing. The subject property is currently vacant and includes the development of 17 single-family homes, resulting in a net increase in housing stock.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				X	The project occurs outside of any identified public or private airport/airstrip noise zones or contours.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?			X		The project does not affect navigable airspace.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X		The project does not involve or affect air traffic movement.
6. **PUBLIC SERVICES -** Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The water service provider (Sacramento Suburban Water District) has adequate capacity to serve the water needs of the proposed project.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		The Sacramento Regional County Sanitation District has adequate wastewater treatment and disposal capacity to service the proposed project. Developing the property will require the payment of Regional San sewer impact fees (connection fees).
c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X		The Kiefer Landfill has capacity to accommodate solid waste until the year 2050.
d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing service lines are located within existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from service line extension.

	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?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project would result in minor increases to student population; however, the increase would not require the construction/expansion of new unplanned school facilities. Established case law, *Goleta Union School District v. The Regents of the University of California* (36 Cal-App. 4th 1121, 1995), indicates that school overcrowding, standing alone, is not a change in the physical conditions, and cannot be treated as an impact on the environment.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will result in increased demand for park and recreation services, but meeting this demand will not result in any substantial physical impacts.
7. **TRANSPORTATION** - Would the project:					

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The project site is located along Manzanita Avenue, a four-lane arterial that extends along the western property line. There is an existing Regional Transit bus stop at the corner of Manzanita Avenue at Bourbon Drive. Therefore, since the project is within ½ mile of a bus stop the project will have a less than significant transportation impact. According to the Sacramento County Department of Transportation, the proposed project would generate less than 237 daily trips; therefore, a VMT analysis for the proposed project is not required. The project will result in minor increases in vehicle trips, but this increase will not cause, either individually or cumulatively, a level of service standard established by Sacramento County to be exceeded.
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. The project is proposing a 30-foot wide private drive off Bourbon Drive along the southern portion of the property. Bourbon Drive is a minor street and Manzanita Avenue is the arterial. A project driveway on a minor street must be a minimum of 35 feet wide and must be a minimum of 40 feet from the curb return of the arterial. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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. Refer to the Air Quality discussion under the Environmental Effects section above.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?			X		The project will not generate objectionable odors.
9. **NOISE -** Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?		X			The project is not in the vicinity of any uses that generate substantial noise, nor will the completed project generate substantial noise. Upon implementation of mitigation measures, the project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards. Refer to the Noise discussion in the Environmental Effects section above.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will not substantially increase water demand over the existing use.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding. Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map (Flood Zone AE). All proposed structures within the 100-year floodplain will be required to have minimum pad elevations pursuant to Ordinance No. 1 of the Sacramento County Drainage Ordinance. The Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards require that the project be located outside or above the floodplain, and will ensure that impacts are less than significant. The project site is in a local flood hazard area, but not in a federally mapped floodplain. Compliance with the County Floodplain Management Ordinance, County Drainage Ordinance, and Improvement Standards will assure less than significant impacts. Refer to the Hydrology discussion in the Environmental Effects section above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		Although the project is within a 100-year floodplain, compliance with the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?				X	The project is not located in an area subject to 200-year urban levels of flood protection (ULOP). The project is located in an area subject to 200-year urban levels of flood protection (ULOP). Refer to the Hydrology discussion in the Environmental Effects section above.
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. **GEOLOGY AND SOILS** - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?			X		The project is not located on an unstable geologic or soil unit.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		A public sewer system is available to serve the project.
e. Result in a substantial loss of an important mineral resource?			X		The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. **BIOLOGICAL RESOURCES** - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?		X			The property has the potential to provide foraging habitat for wildlife. Refer to the Biological Resources discussion in the Environmental Effects section above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site. Refer to the Biological Resources discussion in the Environmental Effects section above.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		No protected surface waters are located on or adjacent to the project site. Refer to the Biological Resources discussion in the Environmental Effects section above.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected.
e. Adversely affect or result in the removal of native or landmark trees?		X			Native and/or landmark trees occur on the project site and/or may be affected by on and/or off-site construction. Mitigation is included to ensure impacts are less than significant. Refer to the Biological Resources discussion in the Environmental Effects section above.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		There are no known conflicts with any approved plan for the conservation of habitat.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project. However, mitigation for cultural resources unanticipated discoveries has been added to the mitigation measures.
b. Have a substantial adverse effect on an archaeological resource?			X		The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		The project site is located outside any area considered sensitive for the existence of undiscovered human remains. No known human remains exist on the project site; nevertheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.
14. **TRIBAL CULTURAL RESOURCES -** Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was not received. Tribal cultural resources have not identified in the project area.
15. **HAZARDS AND HAZARDOUS MATERIALS** - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X		The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		While the project will introduce 17 new homes and increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are net resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The project will fully comply with the SMAQMD GHG Tier 1 BMPs. As such, the project screens out of further analysis and impacts are less than significant. See the GHG discussion above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	**Current Land Use Designation**	**Consistent**	**Not Consistent**	**Comments**
General Plan	Low Density Residential (LDR)	x		
Community Plan	Residential (RD-10)	x		
Land Use Zone	Residential (RD-10)	x		

INITIAL STUDY PREPARERS

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