Todd Smith, Planning Director
Planning and Environmental Review

Troy Givans, Director
Department of Community Development

County of Sacramento

Mitigated Negative Declaration

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

1. **Control Number:** PLNP2022-00238

2. **Title and Short Description of Project:** Public Storage Chippendale

   The project consists of the following entitlement requests:

1. A **Use Permit** to allow mini storage in the Light Commercial (LC) zoning district pursuant to *Sacramento County Zoning Code* (Zoning Code) § 3.2.5, Table 3.1.
2. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

The proposed project would demolish the existing building and construct one, three-story self-storage building in its former footprint with new site improvements. The proposed building consists of 152,532 square feet (SF), including a 900 SF rental office, and is approximately 41' in height.

The applicant's Use Permit request would include operations with lighting provided on-site between the hours of 9am-6pm. The proposed project would include 29 luminaires located along the peripheries of the storage building and within the parking lot (see Plate IS-5). The largest source of light will come from the twenty 15' single head luminaires amounting to an estimated 85,400 lumens during operating hours.

Access to the site will be from two existing driveways on Chippendale Avenue. The western driveway will provide access to customers visiting the rental office or entering the building to visit their storage space. The eastern driveway will be for emergency access only, with no access for customers to the building or parking but will also maintain the existing access easement with the property to the north. A 22-space parking lot will be located adjacent to the customer lobbies on the west side of the building.

The applicant proposes to remove 21 trees, including four Chinese Hackberry, four Tulip Poplar, one Aleppo Pine, one Japanese Black Pine, nine Chinese Tallow, three Chinese Elm, and two Mexican Fan Palm.

All new site improvements will be constructed and will include a fifty-foot landscaped setback along Chippendale Avenue and a new locked trash/recycling enclosure on the west side of the building. The trash and recycling bins are only available to Public Storage office staff, as customers are required to remove their own debris from the facility.

3. **Assessor's Parcel Number:** 228-0151-027-0000

4. **Location of Project:** The Project site is located at 4745 Chippendale Drive, 75 feet northwest of the Chippendale Drive and Wall Street intersection, in the unincorporated community of Carmichael/ Old Foothill Farms.

5. **Project Applicant:** Public Storage

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

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

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

Julie Newton

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2022-00238

NAME: Public Storage Chippendale

LOCATION: The Project site is located at 4745 Chippendale Drive, 75 feet northwest of the Chippendale Drive and Wall Street intersection, the Carmichael/Old Foothill Farms community.

ASSESSOR'S PARCEL NUMBER: 228-0151-027-0000

OWNER:

Attn: Celia Puff
Chippendale Partners, LLC
4745 Chippendale Dr.
Sacramento, CA 95841

APPLICANT:

Attn: Aaron Anderson
Public Storage
701 Western Ave.
Glendale, CA 91201

PROJECT DESCRIPTION

The project consists of the following entitlement requests:

1. A **Use Permit** to allow mini storage in the Light Commercial (LC) zoning district pursuant to *Sacramento County Zoning Code* (Zoning Code) § 3.2.5, Table 3.1.
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The applicant's Use Permit request would include office operations with lighting provided on-site between the hours of 9am-6pm. External lighting would exist continuously. The proposed project would include 29 luminaires located along the peripheries of the storage building and within the parking lot (see Plate IS-5). The largest source of light will come from the twenty 15' single head luminaires amounting to an estimated 85,400 lumens during operating hours (See Plate IS-6).

Access to the site will be from two existing driveways on Chippendale Avenue. The western driveway will provide access to customers visiting the rental office or entering the building to visit their storage space. The eastern driveway will be for emergency access only, with no access for customers to the building or parking but will also maintain the existing access easement with the property to the north. A 22-space parking lot will be located adjacent to the customer lobbies on the west side of the building (See Plate IS-4).

The applicant proposes to remove 21 trees, including four Chinese Hackberry, four Tulip Poplar, one Aleppo Pine, one Japanese Black Pine, nine Chinese Tallow, three Chinese Elm, and two Mexican Fan Palm (See Plate IS-7 and Table IS-11).

All new site improvements will be constructed and will include a fifty-foot landscaped setback along Chippendale Avenue and a new locked trash/recycling enclosure on the west side of the building. The trash and recycling bins are only available to Public Storage office staff, as customers are required to remove their own debris from the facility (See Plate IS-8 and Table IS-12).

ENVIRONMENTAL SETTING

The Project site is located within the Carmichael/Old Foothill Farms portion of unincorporated Sacramento County (see Plate IS-1). The site is located on the north side of the Chippendale Drive and Wall Street intersection, and approximately 0.2 miles east of Interstate 80 Expressway (see Plate IS-2).

The site is fully developed with mature trees and landscaping and is within an urbanized corridor and is currently zoned for Commercial/Office development (See Plate IS-3). The surrounding property land uses consist of a multi-use business office park, a used vehicle sales lot, and shopping center parking.

Overall, the project site is relatively flat, but does have changes in grade elevation from the roadway at ~118± feet along the eastern boundary of the parcel to at 114± feet along the western boundary of the parcel (See Plate IS-4).

Plate IS-1: County Vicinity Map

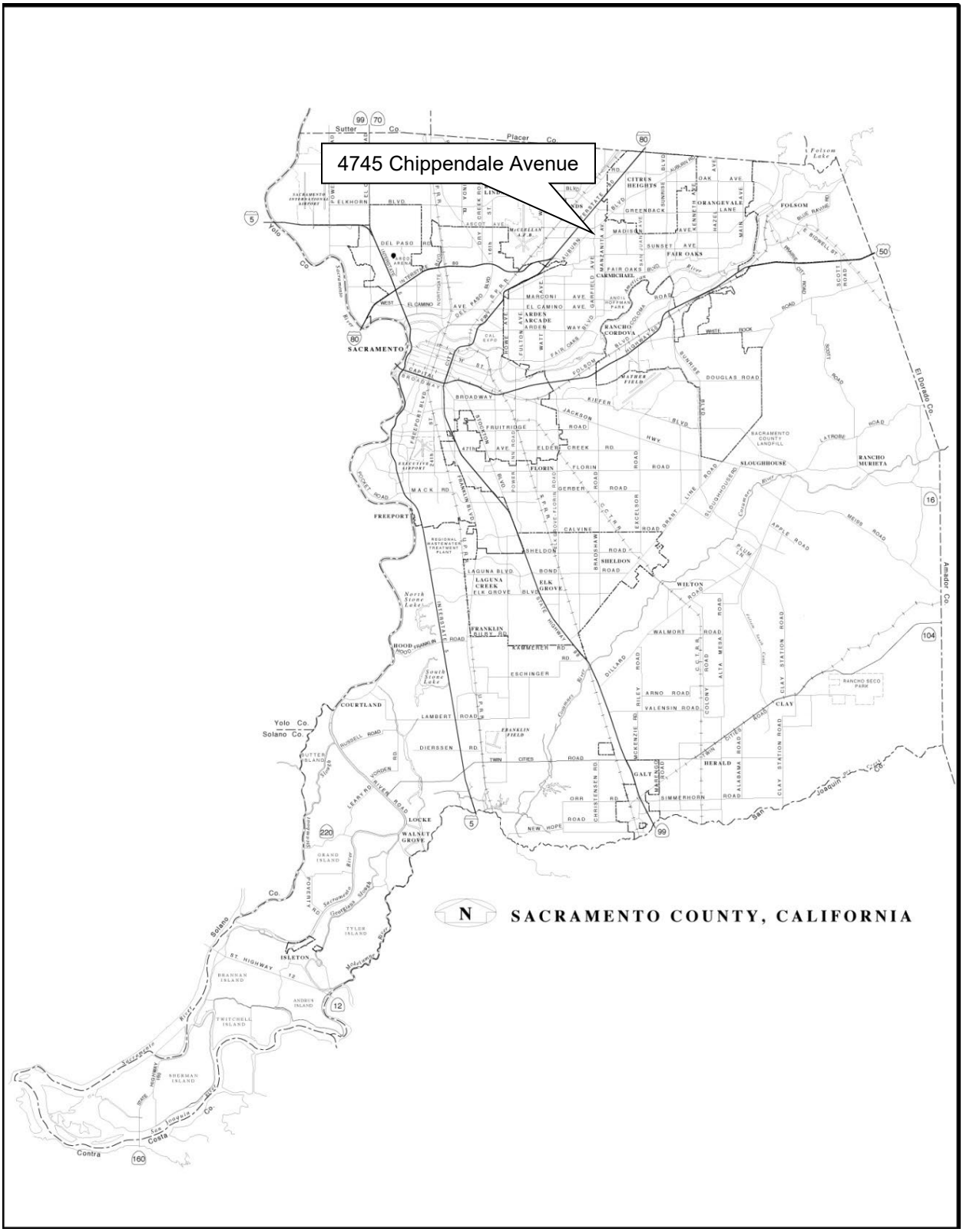


Plate IS-2: Location Map

Plate IS-3: Zoning Map

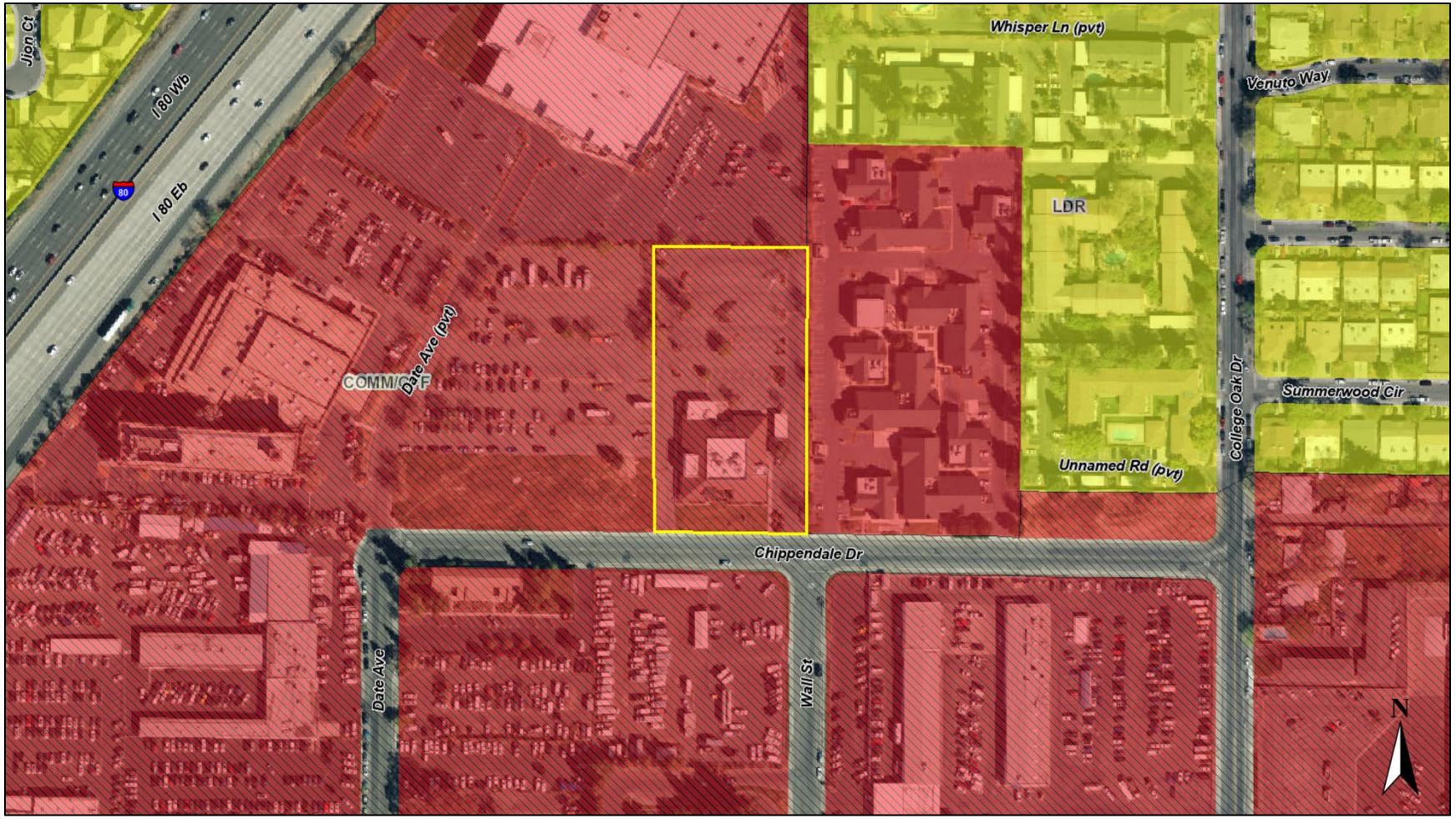
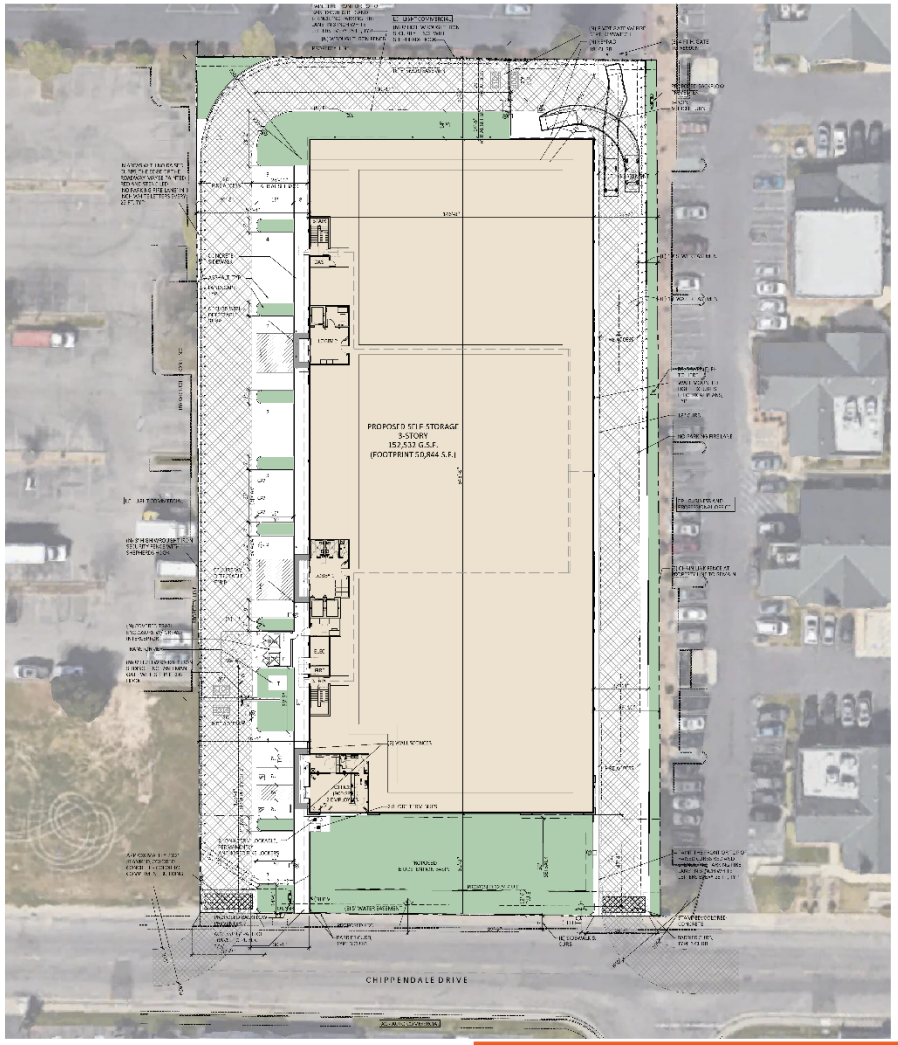


Plate IS-4: Site Plan



PROJECT DESCRIPTION

PROJECT INFORMATION

BUILDING AREA

CAR & BIKE PARKING ANALYSIS

SERVICE PROVIDERS

SACRAMENTO METROPOLITAN FIRE DISTRICT NOTES

EMPLOYEE COUNT

Public Storage

4745 CHIPPENDALE DRIVE | SACRAMENTO, CA
APN: 228-0151-027 CONTROL NO. PLNP2022-00238

SITE PLAN
03.21.23

NORTH

SHEET 2

KSP STUDIO architecture + engineering

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.

AESTHETICS

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

- 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?

The degree of impact of a project, either negative or beneficial, to the visual character of the area is largely subjective. Few objective or quantitative standards are available to analyze visual quality, and individual viewers respond differently to changes in the physical environment. Based on the CEQA Guidelines Appendix G, a project would have a significant impact on aesthetics if it would have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway; substantially degrade the existing visual character or quality of the site and its surroundings; and/or create a new substantial source of light and glare, which would adversely affect day or nighttime views in the area.

LIGHTING

The International Dark-Sky Association (IDA) defines Urban Sky Glow as the “unwanted light emitted in the night sky from poorly aimed lamps, and the result is brightening the skies over our heads.” Poorly aimed lamps, even in commercial and industrial zones, can also be considered a public nuisance when light spills from fixtures in all direction, causing discomfort, or the inability to see properly. Many present lighting installations are bothersome rather than helpful. The wasted light shines into yards and windows, affecting resident’s sleep and do not meet the goals of quality public lighting.

Poor quality lighting also exposes animals to dangers they normally would not encounter. Nocturnal birds are confused by buildings lit up at night that compromise their vision and reduce their hunting range. Excessive lighting may also attract more insects to a location where they otherwise wouldn’t range.

Plate IS-5: Photometric Plan

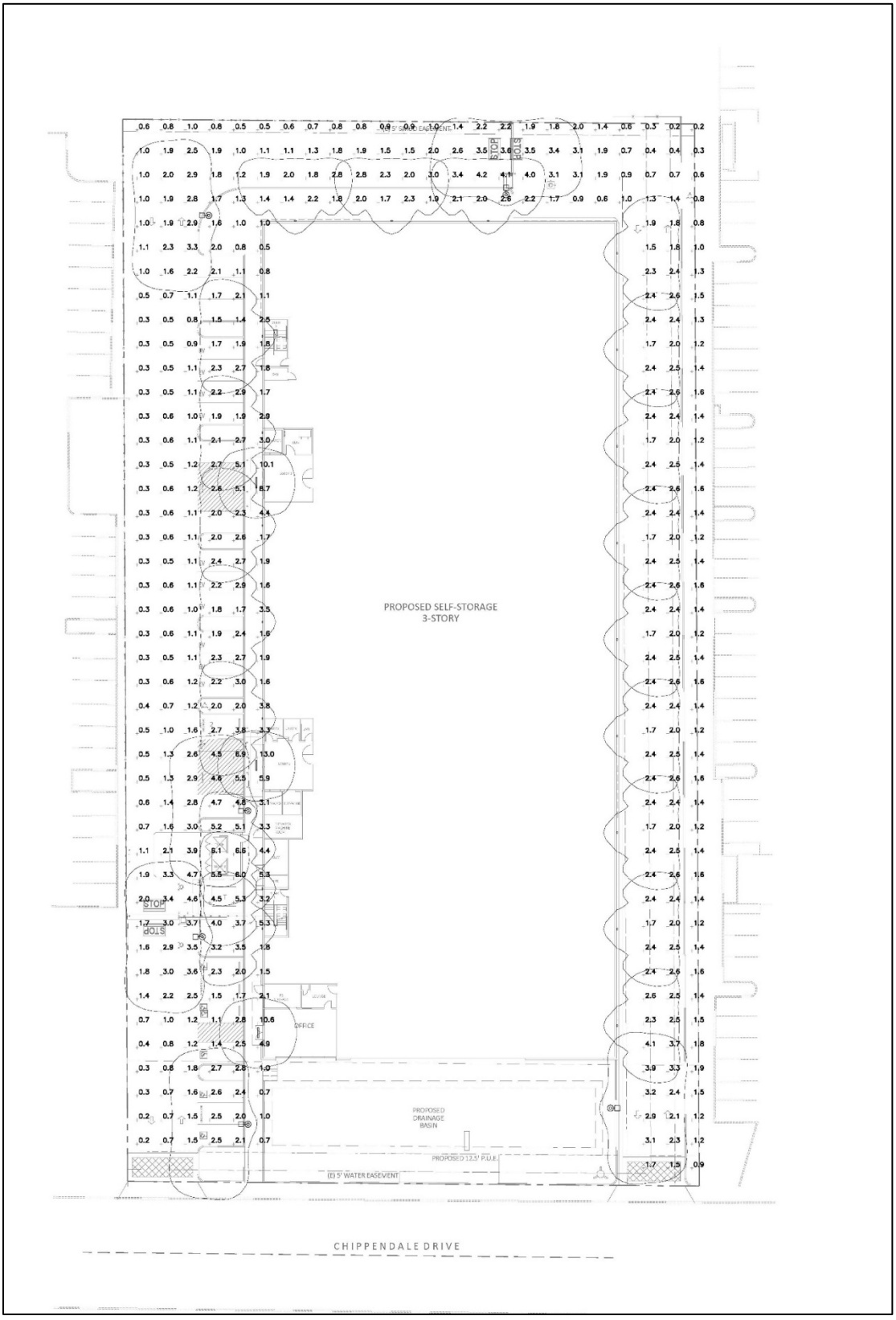
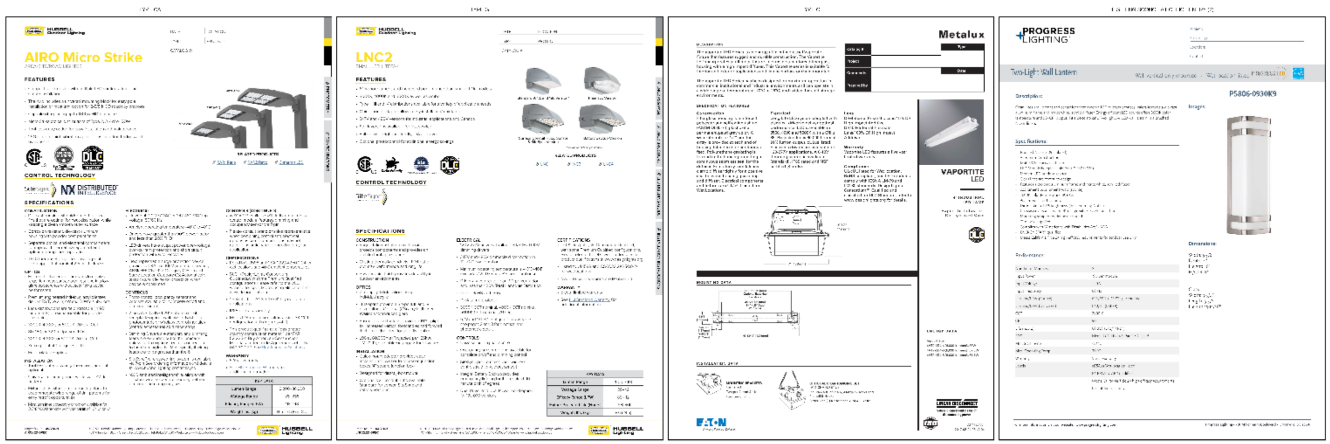


Plate IS-6: Proposed Lighting Devices

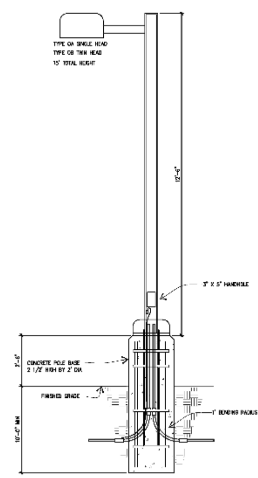


STATISTICS						
Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
CORE PARKING AREA	+	2.0 fc	19.0 fc	0.2 fc	95.0:1	10.0:1

LUMINAIRE SCHEDULE										
Symbol	Label	Qty	Catalog Number	Description	Lamp	File	Lumens	LLF	Watts	MOUNTING HEIGHT AFG
[illegible]	[illegible]	20	LNC2 [illegible]	LITEPACK LNC2	[illegible]	LNC2 [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	4VT2-LD5-4-DR-UNV [illegible]	VAPORTITE STRIP	(112) 3000K CCT, 80 CRI LEDS	4VT2-LD5-4-DR-UNV [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	ASL [illegible]	[illegible]	[illegible]	ASL [illegible]	[illegible]	[illegible]	[illegible]	[illegible]

THE PUBLIC STORAGE LIGHT FIXTURES WILL BE IN OPERATION DURING ALL HOURS OF DARKNESS. OPERATIOG HOURS ARE FROM 6AM - 9PM.

ALL LIGHT FIXTURES ARE FLAT LENSED AND FULL CUT-OFF TO MEET ALL CALIFORNIA TITLE 24 ENERGY COMPLIANCE CRITERIA.



Public Storage

4745 CHIPPENDALE DRIVE | SACRAMENTO, CA
APN: 228-0151-027 CONTROL NO. PLNP2022-00238

PHOTOMETRIC INFORMATION

SHEET 7

KSP STUDIO
architecture + engineering

Table IS-1: CEC Standards Table 10-114-A Lighting Zone Characteristics and Rules for Amendments by Local Jurisdictions

Zone	Ambient Illumination	Statewide Default Location	Moving Up to Higher Zones	Moving Down to Lower Zones
LZ1	Dark	Government-designated parks, recreation areas, and wildlife preserves. Those that are wholly contained within a higher lighting zone may be considered by the local government as part of that lighting zone.	A government designated park, recreation area, wildlife preserve, or portions thereof, can be designated as LZ2 or LZ3 if they are contained within such a zone.	N/A
LZ2	Low	Rural areas, as defined by the 2000 U.S. Census.	Special districts within a default LZ2 zone may be designated as LZ3 or LZ4 by a local jurisdiction. Examples include special commercial districts or areas with special security considerations located within a rural area.	Special districts and government designated parks within a default LZ2 zone maybe designated as LZ1 by the local jurisdiction for lower illumination standards, without any size limits.
LZ3	Medium	Urban areas, as defined by the 2010 U.S. Census.	Special districts within a default LZ3 may be designated as a LZ4 by local jurisdiction for	Special districts and government designated parks within a default LZ3 zone may be

			high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels.	designated as LZ1 or LZ2 by the local jurisdiction, without any size limits.
LZ4	High	None.	N/A	N/A

PROJECT ANALYSIS

Whether the Project's contribution to light pollution is considered a new source of light and glare that could be considered substantial, or a nuisance is dependent on zoning and proximity to private residences. According to the California Energy Commission's Standards for Outdoor Lighting Zones, the 2010 U.S. Census designation of the Project site as an "Urban Area" is considered in order to determine its lighting zone as LZ3, one of medium ambient illumination.

The proposed project occurs within a commercial/office corridor and the nearest private residence is an apartment complex located at 5311 College Oak Drive, approximately 500 feet east of the Project site, separated by an existing office park. The Project site's proposed lighting mitigates concerns of Urban Sky Glow through the use of low-glare LED luminaires that are adjustable in both direction and brightness (See Plate IS-6). As such, the proposed lighting does not introduce new potential light pollution to a rural, unlit area nor is it near residences where commercial lighting may be considered a nuisance. The types of lighting proposed in the submitted photometric plan also indicate that the directional lighting is positioned facing inward to prevent light and glare from extending beyond the parcel's boundaries as much as is feasible (Plate IS-6). Thus, the proposed project's lighting plan would not be considered a new source of bothersome glare. The proposed location is not currently identified within the territory of threatened nocturnal wildlife and is not considered a new potential hazard to animals.

CONCLUSION

The proposed project is located in an urbanized environment with existing above ground utilities along Chippendale Avenue. The proposed new building is designed to complement the existing structures near the Project site. At night the extensive arrays of illuminated street and parking lot lights, as well as numerous lighted signs and motor vehicle headlights provide a substantial source of light pollution in the community. The use of low LED, directional lights will prevent spillover light onto neighboring properties. Given the urban environment, the proposed project will not create a new source of light

and glare which would adversely affect day or nighttime views in the area. Impacts associated with aesthetics 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?

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 VMT thresholds of significance are summarized in Table IS-2.

VMT ANALYSIS

SacDOT provided a preliminary trip generation analysis for the proposed project on October 4, 2022. The analysis compared the project to the SacDOT 2020 Transportation Analysis Guidelines to determine what potential transportation analyses may be required. SacDOT initially estimated that the proposed project would generate 305 daily trips and would therefore exceed the maximum 237 daily trips that would qualify for a small project exemption. As such, a qualitative VMT analysis was required. As shown in Table IS-3, the proposed project does not exceed 1,000 daily trips and less than 100 trips during peak operational hours. Therefore, no Local Transportation Analysis (LTA) was required.

On November 30, 2022, LSA Associates Inc. provided a Trip Generation, VMT, and Parking Analysis in support of the proposed project. LSA found that trip rates referenced

from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021) allows a classification for "mini warehouse" public storage projects. When applying this criterion, LSA found that average daily trips fell to an estimated 221, and below the threshold for small project exemption (see Table IS-3).

Table IS-2: 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 required4; AND • Transit Access: Project has access to transit within a ½ mile walking distance; AND • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.

[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

Table IS-3: LSA Project Trip Generation Summary

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
Mini-Warehouse		**TSF**	**1.45**	**0.05**	**0.04**	**0.09**	**0.07**	**0.08**	**0.15**
Project Trip Generation									
Public Storage	**152.532**	**TSF**	**221**	**8**	**6**	**14**	**11**	**12**	**23**

[1] Trip rates referenced from the Institute of Transportation Engineers (ITE) *Trip Generation* Manual, 11th Edition (2021).
Land Use Code 151 - Mini-Warehouse
ADT = average daily trips
TSF = thousand square feet

VMT CONCLUSION

VMT per capita for the proposed project was estimated using the most recent Sacramento County's Transportation Analysis Guidelines. Based upon the above analysis, the proposed project's VMT per capita does not exceed the threshold of significance prescribed by Sacramento County and thus impacts related to VMT are ***less than significant***.

AIR QUALITY

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

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

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

Table IS-4: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment (1-hour Standard[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-5: 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 Particulate Matter Emissions & Ozone Precursor Emissions (NO_x)

The Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide) includes screening criteria for construction-related particulate matter and ozone precursor emissions. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction PM_{10}, $PM_{2.5}$, or 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); or,

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

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 (2.4 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/export of soil materials requiring a considerable amount of haul truck activity.

The project will require grading, trenching, and excavation as well as the demolition of site components (the existing office building). The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices (BCECP) 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.

Staff prepared an air quality analysis, dated June 26, 2023, for the proposed project with estimated construction emissions using CalEEMOD (see Appendix B). CalEEMod utilizes equipment, phasing and timelines to generate daily construction emissions and operation emissions for a project. For modeling purposes, maximum numbers of equipment were used, and it was assumed all equipment could operate simultaneously. This represents a conservative estimate of equipment and timelines that demonstrates a 'worst case scenario' in terms of potential emissions. The results are summarized in Table IS-6 below. Note that the project will implement the BCECP and therefore can utilize a non-zero threshold of significance for PM.

Table IS-6: CalEEMod Estimated Construction Emissions

Construction Year 2024	Constituent in pounds per day			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Thresholds	n/a	85	80	82
Estimated Emissions	4.019	39.83	55.45	7.63

CONSTRUCTION EMISSIONS CONCLUSION

As shown in the above table, the project will not exceed the PM or NO_x significance threshold for construction emissions. Therefore, construction impacts related to both Particulate Matter and Ozone precursors and impacts are ***less than significant.***

OPERATIONAL EMISSIONS/LONG-TERM IMPACTS

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

Typically, a project must be comprised of large acreages or intense uses in order to result in significant operational air quality impacts. The estimated operational emissions for the proposed project were calculated using CalEEMOD. See Table IS-7 below for estimated operational estimates; emissions for all constituents were found to be less than the significance threshold. Impacts are ***less than significant***.

Table IS-7: CalEEMOD Estimated Operational Emissions

Operational Year 2024	Constituent in pounds per day			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Thresholds	n/a	85	80	82
Operational (long-term)	30.84	1.52	<0.095	<0.095

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-8 and Table IS-9.

Table IS-8: $PM_{2.5}$ 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	1.1	1.1	0.0058%	18419
Hospital Admissions, Asthma	0 - 64	0.075	0.070	0.0038%	1846
Hospital Admissions, All Respiratory	65 - 99	0.36	0.32	0.0016%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.20	0.18	0.00075%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000098	0.000092	0.0024%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0090	0.0085	0.0028%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.020	0.019	0.0026%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.033	0.032	0.0026%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.12	0.11	0.0023%	5052
Mortality					
Mortality, All Cause	30 - 99	2.4	2.2	0.0049%	44766

Notes:

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

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

Table IS-9: Ozone Health Risk Estimates

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

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

It is important to note that the "model outputs are derived from the numbers of people who would be affected by [the] project due to their geographic proximity and based on

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

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

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

HYDROLOGY AND WATER QUALITY

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

- 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?

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

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

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

requirements to reduce the discharge of sediments and other pollutants in runoff from newly developing and redeveloping areas of the County.

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

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

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

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

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

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

managing portable toilets properly, and dry sweeping instead of washing down dirty pavement.

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

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

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

OPERATION: STORMWATER RUNOFF

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

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

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

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

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*.**

Drainage/Flooding

The project site is located in Federal Emergency Management Agency (FEMA) Flood Zone X as determined by the 1998 FEMA Federal Insurance Rate Map (FIRM) panel number 060262. Flood Zone X is an area that is determined to be outside the 500-year floodplains.

In compliance with the Conditions of Approval for the project, the project must provide retention of 100% of the site's developed runoff as required by City Ordinances and Policies. The site also must incorporate adequate on-site drainage facilities to route onsite rainfall to the bioretention planter. To size the bioretention planter, the Sacramento County Volume-Based Design Method as outlined in the Sacramento Region Stormwater Quality Design Manual was used. The site area was developed from surveys, engineers site plan, and rainfall data was collected from SacCalc and the Sacramento method.

Lars Andersen & Associates, Inc. submitted a preliminary drainage study on behalf of the applicant on January 24th, 2023, which includes the proposed design of the recommended bioretention planter to be incorporated into the landscape set-back adjacent to Chippendale Avenue (see Drainage Study, Appendix A). The study concluded no changes in impacts to the existing storm drainage or upstream facilities and recommended the bioretention planter as an improvement upon existing infrastructure. Compliance with the above ordinances and standards to minimize any offsite impacts due to drainage from the project site will ensure that impacts associated with drainage will be ***less than significant.***

BIOLOGICAL RESOURCES

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

- Conflict with any local policies or ordinances protecting biological resources?

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 major goal outlined in the Conservation Element of the General Plan is for the management and protection of natural resources for the use and enjoyment of present and future generations, while maintaining the long-term ecological health and balance of the environment.

PROJECT TREE ANALYSIS

The Project site currently contains 21 mature trees, all proposed for removal (See Plate IS-7). In their place, the applicant proposes to replant 19 trees along with new landscaping throughout the peripheries of the parcel (See Plate IS-8). The existing trees are landscape trees and are not potential habitat for special status birds or raptors. No protected heritage trees or native oak species exist on-site.

Table IS-10: Non-Native Trees Proposed for Removal

Scientific Name	Common Name	Count
Celtis sinensis	Chinese Hackberry	4
Liriodendron tulipfera	Tulip Poplar	1
Pinus halepensis	Aleppo Pine	1
Pinus thunbergh	Japanese Black Pine	1
Triadica sebifera	Chinese Tallow	9
Ulmus parvifolia	Chinese Elm	2
Washingtonia robusta	Mexican Fan Palm	3
		Total: 21

Table IS-11: Non-Native Trees Proposed as Replacement

Scientific Name	Common Name	Count
Cinnamomum camphora or; *Koelreuteria bipinnata or;* *Lophostemon confertus*	Camphor Tree Chinese Flame Tree Brisbane Box	9
Arbutus marina or; *Koelreuteria bipinnata or;* *Laurus nobilis*	Sweet Bay Chinese Flame Tree Sweet Bay	4
Cinnamomum camphora or; *Pinus halipensis or;* *Podocarpus gracilior*	Camphor Tree Aleppo Pine Fern Pine	5
		Total: 18

County Planning and Environmental Review (PER) staff calculated the tree canopy from the circle area radius formula ($A=\pi r2$) using the average tree dripline of 21 non-native trees proposed for removal to determine the amount that will be removed on-site due to the project. Total non-native tree canopy loss on-site due to the proposed removal of 21 non-native trees will be approximately 15,450 square feet. The current proposed tree replacements provide an estimated 9,914 square feet of 15-year Tree Shade Cover Value, resulting in a net loss of 5,536 square feet of shade canopy. To compensate for the loss of non-native tree canopy, tree plantings consistent with General Plan policy CO-145 will be required. This will be accomplished by planting enough trees from the County's approved landscape tree list so that planted trees yield an equivalent amount of canopy utilizing the 15-year shade values. Mitigation will require either an increase to on-site.

Plate IS-7: Proposed Tree Removal

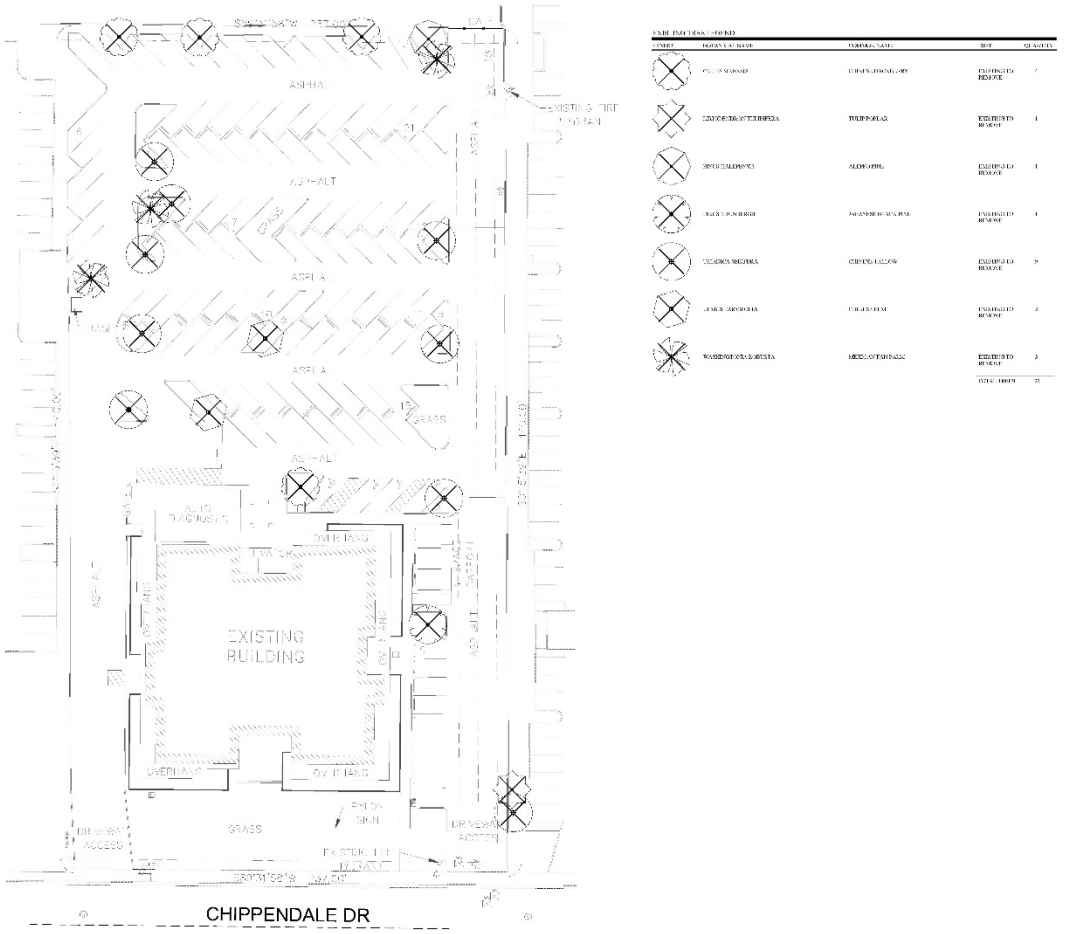
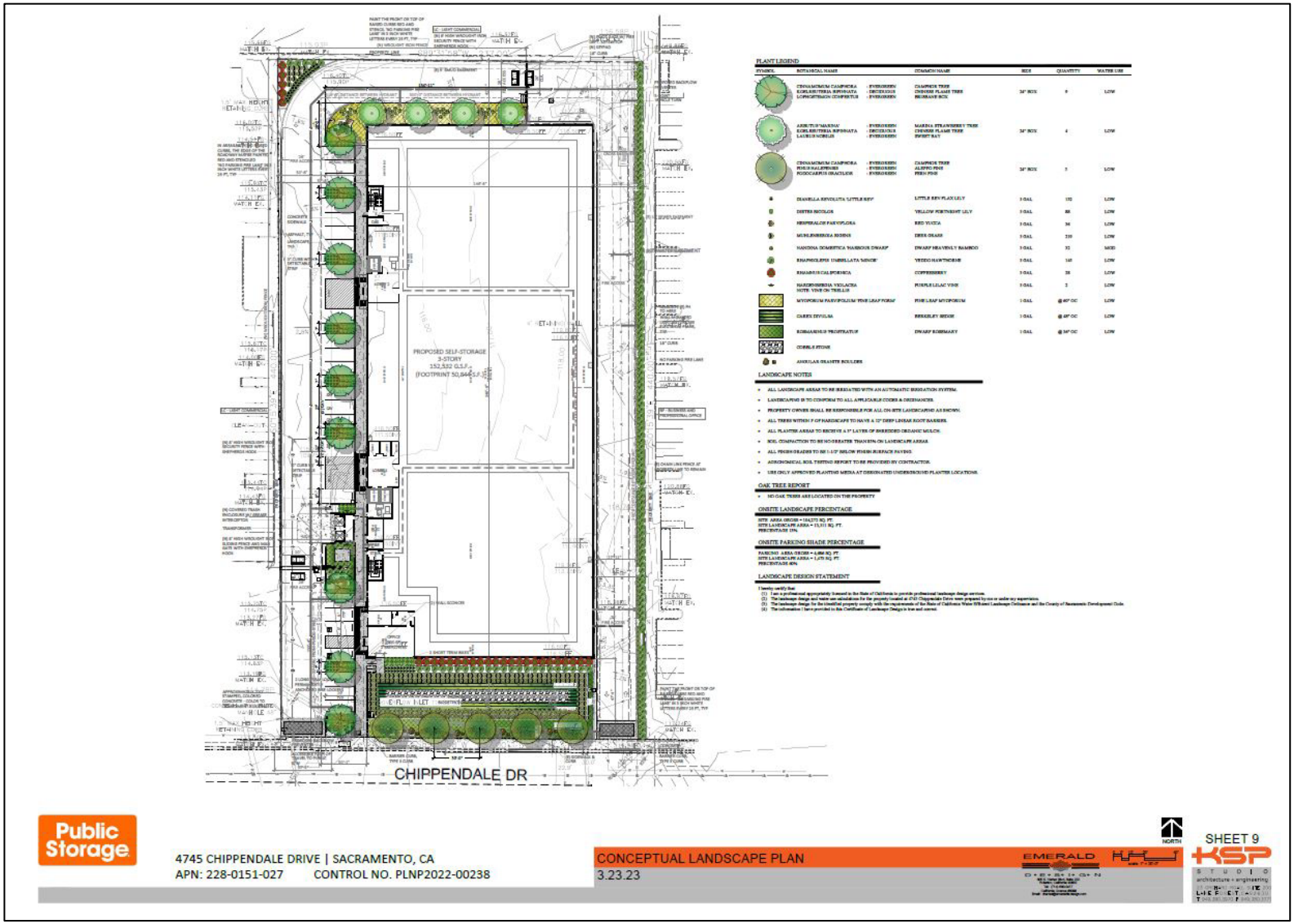


Plate IS-8: Landscaping Plan



replanting of non-native trees to the greatest extent feasible, or payment into the Greenprint program. With mitigation, impacts associated with non-native tree canopy removal are ***less than significant with mitigation***

GREENHOUSE GAS EMISSIONS

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

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

GREENHOUSE GAS EMISSIONS REGULATORY BACKGROUND

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this establishes a broad framework for the State's long-term GHG reduction and climate change adaptation program. Of particular importance is AB 32, which establishes a statewide goal to reduce GHG emissions back to 1990 levels by 2020, and Senate Bill (SB) 375 supports AB 32 through coordinated transportation and land use planning with the goal of more sustainable communities. SB 32 extends the State's GHG policies and establishes a near-term GHG reduction goal of 40% below 1990 emissions levels by 2030. Executive Order (EO) S-03-05 identifies a longer-term goal for 2050.[1]

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

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

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

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

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 space protection as a means of providing groundwater recharge. Actions include metering, water recycling programs, water use efficiency policy, water efficiency audits, greywater programs/policies, river-friendly landscape demonstration gardens, participation in the water forum, and many other related measures.

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

The commitment to a community-wide 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 (BMP) 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-12. 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-12.

Table IS-12: SMAQMD Thresholds of Significance for Greenhouse Gases

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

GREENHOUSE GAS EMISSIONS PROJECT IMPACTS

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust, which is covered in the Air Quality section above. CalEEMOD was utilized to calculate the emissions associated with construction and all emissions were found to be less than the threshold of significance. Therefore, construction related GHG impacts are considered ***less than significant***.

OPERATION-GENERATED GREENHOUSE GAS EMISSIONS

All projects must implement Tier 1 Best Management Practices (BMP-1 and BMP-2) to demonstrate consistency with the Climate Change Scoping Plan. Mitigation has been included to ensure the project will implement the Tier 1 BMPs. The project will not utilize natural gas, and based upon review of the current site plan, the project's parking lot of 22 parking spaces would be required to make 2 spaces electric vehicle ready, based on the 2022 Cal Green Building Code. Upon implementation of Tier 1 BMPs, the project's estimated emissions can be compared against the established operational threshold of 1,100 metric tons per year of CO^2e. CalEEMod was ulitized to estimate the project's operational emissions, found to be 375 metric tons per year of CO^2e, which is below the established significance threshold, thus eliminating the requirement for additional mitigations beyond Tier 1 Best Management Practices. Therefore, operation related GHG impacts are considered ***less than significant with mitigation***.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures A-C 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: NON-NATIVE TREE CANOPY AND REPLACEMENT

Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species. Preference is given to on-site mitigation, but if this is infeasible, then funding shall be contributed to the Sacramento Tree Foundation's Greenprint program in an amount proportional to the tree canopy lost (as determined by the 15-year shade cover calculations for the tree species to be planted through the funding, with the cost to be determined by the Sacramento County Tree Foundation). In order to compensate for the substantial loss of non-native urban tree canopy, approximately 15,450 square feet of tree canopy shall be provided on-site or through funding into the Greenprint program. The non-native trees remaining in place or relocated on-site shall not be included as credit towards the tree canopy replacement amount.

MITIGATION MEASURE C: GREENHOUSE GASES

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

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

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

- 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).

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 $3,500.00. 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 and Old Foothills Farms Community Plan, and Sacramento County Zoning Code.
b. Physically disrupt or divide an established community?			X		The project will not create physical barriers that substantially limit movement within or through the community.
2. **POPULATION/HOUSING -** Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The project will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?			X		The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project will not require the use of public school services.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will not require park and recreation services.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		Per the Sacramento County 2020 Transportation Analysis Guidelines, the project is considered a small project with less than 237 average daily trips and is therefore considered to have a less than significant impact related to VMT. Please refer to the transportation section above.
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are not 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 not significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.
8. **AIR QUALITY** - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?		X			Compliance with existing dust abatement rules and standard construction mitigation for vehicle particulates will ensure that construction air quality impacts are less than significant. The California Emissions Estimator Model (CalEEMod) was used to analyze ozone precursor emissions; the project will/will not result in emissions that exceed standards. Standard mitigation will ensure these impacts are reduced to less than significant levels.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		There are no sensitive receptors (i.e., schools, nursing homes, hospitals, daycare centers, etc.) adjacent to the project site.
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. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will not 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		Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?				X	The project site is not within a 100-year floodplain.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?				X	The project is not located in an area subject to 200-year urban levels of flood protection (ULOP).
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		A public sewer system is available to serve the project.
e. Result in a substantial loss of an important mineral resource?			X		The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		Soils within the project area consist of Plio-Pleistocene and Pliocene loosely consolidated deposits. 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		No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		No protected surface waters are located on or adjacent to the project site.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		The project site is already developed. Project implementation would not affect native resident or migratory species.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e. Adversely affect or result in the removal of native or landmark trees?			X		No native and/or landmark trees occur on the project site, nor is it anticipated that any native and/or landmark trees would be affected by off-site improvement required as a result of the project. 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, given shade canopy is maintained through planting of in-kind trees or contribution to the Greenprint Program.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		There are no known conflicts with any approved plan for the conservation of habitat.
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project.
b. Have a substantial adverse effect on an archaeological resource?			X		No known archaeological resources occur on-site. The Northern California Information Center was contacted regarding the proposed project. 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.
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/was not received. Tribal cultural resources have not identified in the project area.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
15. **HAZARDS AND HAZARDOUS MATERIALS** - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X		The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		There are three known closed contaminated groundwater and soil contaminated sites for gasoline (T0606700282, T0606701079, T0606700305) within 1,000 feet of this site. These sites are no longer considered a potential concern for hazardous materials. No known hazardous materials sites exist within the project 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 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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project 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. See the GHG discussion above and Mitigation Measure C. The California Emissions Estimator Model (CalEEMod) was used to estimate the greenhouse gas emissions associated with the project. Based on the results, the established County threshold of 1,100 annual metric tons of CO2e for the commercial/industrial sector of the proposed project will not be exceeded.
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	Commercial/Office	X		
Community Plan	Light Commercial	X		
Land Use Zone	Light Commercial	X		

INITIAL STUDY PREPARERS

Environmental Coordinator: Julie Newton

Section Manager: Kevin Messerschmitt

Project Leader: Candise Vogel

Office Manager: Belinda Wekesa-Batts

Administrative Support: Justin Maulit