



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:** PLNP2022-00174
2. **Title and Short Description of Project:** Yeshe Arden Apartments

The project consists of the following requests:

1. A **Conditional Use Permit** to allow a multifamily residential development within the Business Professional (BP) Zoning District.
2. A **Special Development Permit** to allow the proposed project to deviate from the following development standards:
 - **Frontage Landscape Planter** (Section 5.2.4.B.2.a): The standard for frontage landscape planters in the BP zoning district is 25 feet. The project as proposed provides a 10-foot, 7-inch frontage planter.
 - **Frontage Planter Tree Spacing** (Section 5.2.4.B.2.a). The standard is trees spaced 30 feet on center between four and ten feet from the back of walk. The project as proposed provides a maximum spacing of 40 feet on center varying between four and 9 feet from the back of walk.
 - **Minimum Interior Side Setbacks:** Section 5.4.3.C, Table 5.8.B: The standard for interior side yard setbacks for three story buildings is 20 feet. The project as proposed provides a 12.5-foot side yard setback on the west and 11 feet on the east.
 - **Setback from Existing Single Family Residential** (Section 5.4.3.C, Table 5.8.B). The standard setback from existing single-family residential for two story buildings is 50 feet and for three story buildings is 75 feet. The project as proposed provides a minimum setback of 12 feet for the two-story building, and 11'4" for three story buildings from existing single family residential.
3. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

If approved, the project would result in the construction of three, three-story buildings and one, two-story building which would provide a total of 39 multi-family dwelling units. Parking onsite would consist of 80 parking stalls. Other planned community amenities include a community garden area, outdoor covered patios and a children's playground. The project proposes to extend Cleo Way to the north approximately 105 feet, where it would end as a circular turnaround with a private access road. A 25-foot-wide private access drive would extend from the end of Cleo Way providing access to the rest of the development.

3. **Assessor's Parcel Number:** 266-0261-008-0000, 266-0261-009-0000, 266-0253-001-0000, & 266-0284-001-0000
4. **Location of Project:** The project site is located along Cleo Way, approximately 1,900 feet northwest of the intersection of Darwin Street and El Camino Avenue, in the Arden-Arcade community. The western two parcels

are located in the city of Sacramento and the eastern two parcels are located in unincorporated Sacramento County.

- 5. Project Applicant:** Yeshi Holdings LLC
- 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 Planning and Environmental Review Division in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Planning and Environmental Review Division at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2022-00174

NAME: Yeshi Arden Apartments

LOCATION: The project site is located along Cleo Way, approximately 1,900 feet northwest of the intersection of Darwin Street and El Camino Avenue, in the Arden-Arcade community. The western two parcels are located in the city of Sacramento and the eastern two parcels are located in unincorporated Sacramento County.

ASSESSOR'S PARCEL NUMBERS: 266-0261-008-0000, 266-0261-009-0000, 266-0253-001-0000, & 266-0284-001-0000

OWNER/APPLICANT:

Yeshi Holdings LLC
P.O. Box 660458
Sacramento, CA 95866

PROJECT DESCRIPTION

The project consists of the following requests:

1. A **Conditional Use Permit** to allow a multifamily residential development within the Business Professional (BP) Zoning District.
2. A **Special Development Permit** to allow the proposed project to deviate from the following development standards:
 - Frontage Landscape Planter (Section 5.2.4.B.2.a): The standard for frontage landscape planters in the BP zoning district is 25 feet. The project as proposed provides a 10-foot, 7-inch frontage planter.
 - Frontage Planter Tree Spacing (Section 5.2.4.B.2.a). The standard is trees spaced 30 feet on center between four and ten feet from the back of walk. The project as proposed provides a maximum spacing of 40 feet on center varying between four and 9 feet from the back of walk.

- Minimum Interior Side Setbacks: Section 5.4.3.C, Table 5.8.B: The standard for interior side yard setbacks for three story buildings is 20 feet. The project as proposed provides a 12.5-foot side yard setback on the west and 11 feet on the east.
 - Setback from Existing Single Family Residential (Section 5.4.3.C, Table 5.8.B). The standard setback from existing single-family residential for two story buildings is 50 feet and for three story buildings is 75 feet. The project as proposed provides a minimum setback of 12 feet for the two-story building, and 11'4" for three story buildings from existing single family residential.
3. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

If approved, the project would result in the construction of three, three-story buildings and one, two-story building which would provide a total of 39 multi-family dwelling units. Parking onsite would consist of 80 parking stalls. Other planned community amenities include a community garden area, outdoor covered patios and a children's playground. The project proposes to extend Cleo Way to the north approximately 105 feet, where it would end as a circular turnaround with a private access road. A 25-foot-wide private access drive would extend from the end of Cleo Way providing access to the rest of the development.

ENVIRONMENTAL SETTING

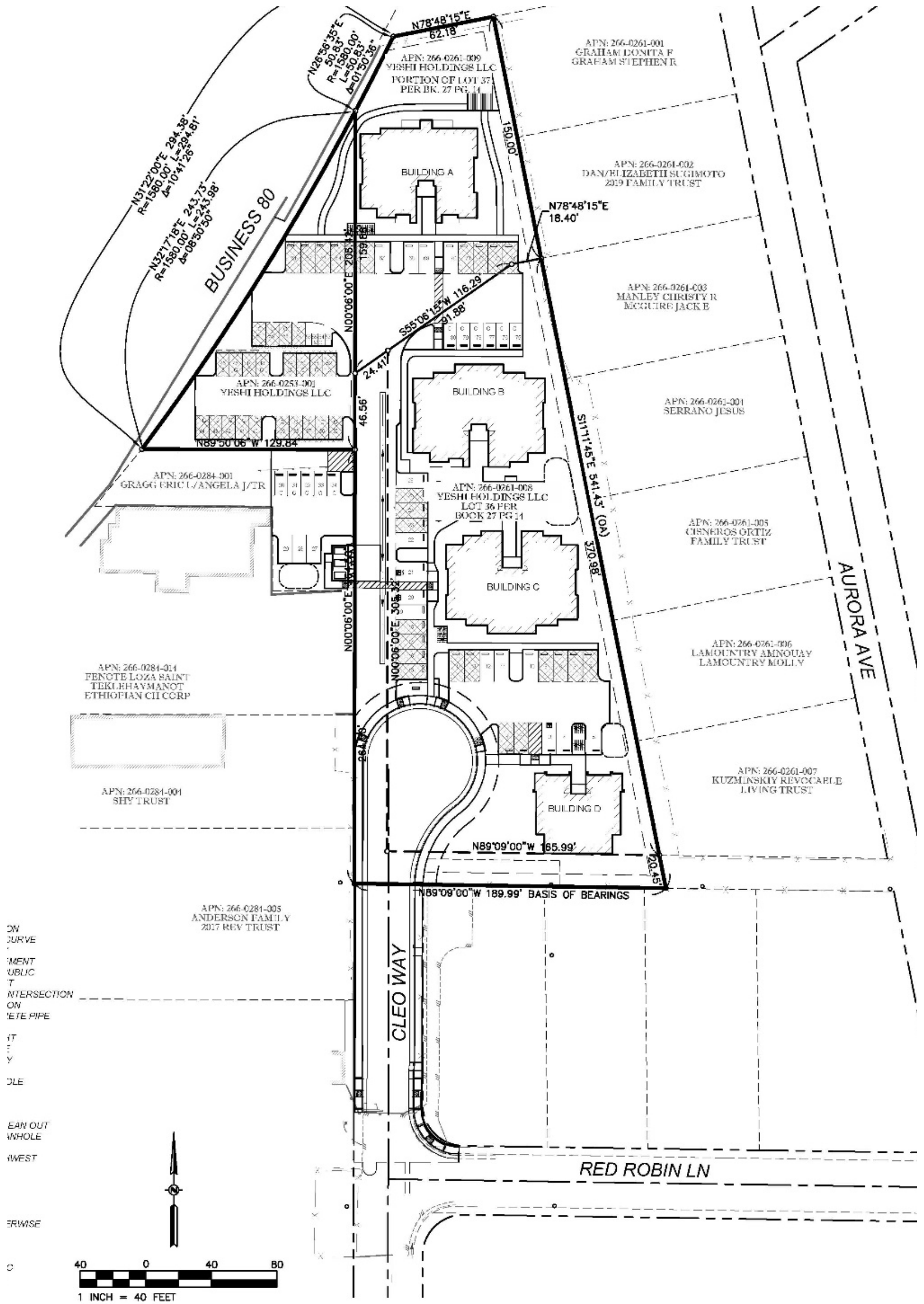
The project site consists of four parcels totaling approximately 1.9 acres. The western two parcels are bordered by an existing soundwall, which separates the parcels from Business 80, and are located within the city of Sacramento. The eastern two parcels are located within the unincorporated County. Site elevation ranges from 48-52 feet above mean sea level and slopes to the south. An existing advertising billboard is located within the southwestern parcel (APN: 266-0284-001-0000) and would remain. The site has a total of 16 trees on site including 7 native oaks and 9 non-native tree species.

The portion of the site within the unincorporated County is within the Business Professional (BP) zoning district. The portion of the site within the city of Sacramento is zoned R-1 Single Family Residential. Surrounding uses include single family residential homes to the east; Business 80 to the west; a church to the south; and low-rise apartments to the south and southwest.

Plate IS-1: Project Location



Plate IS-2: Proposed Site Plan



ENVIRONMENTAL EFFECTS

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

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.
- Result in a substantial adverse impact to access and/or circulation.
- Result in a substantial adverse impact to public safety on area roadways.

VEHICLE MILES TRAVELLED (VMT)

Senate Bill 743 (Steinberg, Chapter 386, Statutes of 2013; SB 743) modified how transportation impacts are evaluated under CEQA by requiring Lead Agencies to disclose how a project's transportation impacts affect greenhouse gas emissions rather than automobile delay. The intent of SB 743 is to bring CEQA transportation analyses into closer alignment with other statewide policies regarding greenhouse gas reduction, active transportation and complete streets, and smart growth. As a result, the Governor's Office of Planning and Research recommended the adoption of VMT as the metric to determine the significance of transportation impacts under CEQA. CEQA Guidelines §15064.3, which addresses the use of VMT as the metric for transportation analysis, indicates "[b]eginning on July 1, 2020, the provisions of this section shall apply statewide" (see subdivision (c)).

The County of Sacramento Department of Transportation (DOT) staff (G. Gasperi, Senior Civil Engineer) reviewed the project and determined that the project is exempt from VMT analysis. A residential project can be exempt from a VMT study if the site exists in a VMT efficient area based on an approved screening map. The project site is within a VMT efficient area which produces 85% or less VMT than the regional average according to the approved Sacramento Area Council of Governments (SACOG) Residential VMT Screening Map. Therefore, a VMT analysis for the proposed project is not required and impacts related to VMT are ***less than significant***.

ACCESS, CIRCULATION, & SAFETY

DOT estimated that the project would have 325 daily trips and 35-37 AM/PM peak trips. The proposed project would generate less than 1,000 daily trips and less than 100 trips during the AM/PM peak hour; therefore, a local transportation analysis is not required.

The project site can only be accessed via Cleo Way from Red Robin Lane. Cleo Way ends at its intersection with Aurora Way-Darwin Street Alley and would need to be extended to provide access to the project parcels. The project proposes to extend Cleo Way to the north approximately 105 feet where it would end in a circular turnaround. A curbcut at the northeast corner of Cleo Way would provide vehicular access to the 15-stall parking lot serving Building D (the southernmost building). A 25-foot-wide private access drive at the northwestern terminus of Cleo Way would provide access to the other three buildings.

The project would also extend sidewalks along Cleo Way and connect them to existing sidewalk segments. The project would not result in adverse impacts to access or circulation. In addition, the project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are **less than significant**.

AIR QUALITY

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

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.
- Expose sensitive receptors to pollutant concentrations in excess of standards.

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-1). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-2).

Table IS-1: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment (1-hour Standard ¹ and 8 hour standard)	Non-Attainment, Classification = Severe -15* (8 hour ³ Standards) Attainment (1-hour standard ²)
Particulate Matter 10 Micron	Non-Attainment (24-hour Standard and Annual Mean)	Attainment (24-hour standard)
Particulate Matter 2.5 Micron	Attainment (Annual Standard)	Non-Attainment (24-hour Standard) and Attainment (Annual)
Carbon Monoxide	Attainment (1-hour and 8-hour Standards)	Attainment (1-hour and 8-hour Standards)
Nitrogen Dioxide	Attainment (1-hour Standard and Annual)	Unclassified/Attainment (1-hour and Annual)
Sulfur Dioxide ⁴	Attainment (1-hour and 24-hour Standards)	Attainment/unclassifiable ⁵
Lead	Attainment (30-Day Standard)	Attainment (3-month rolling average)
Visibility Reducing Particles	Unclassified (8-hour Standard)	No Federal Standard
Sulfates	Attainment (24-hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (1-hour Standard)	No Federal Standard
<p>1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.</p> <p>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.</p> <p>3. For the 1997, 2008 and the 2015 Standard.</p> <p>4. Cannot be classified</p> <p>5. Designation was made as part of EPA's designations for the 2010 SO₂ Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017</p> <p>* Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports</p> <p>Source: SMAQMD. "Air Quality Pollutants and Standards". Web. Accessed: June 27, 2024. http://airquality.org/air-quality-health/air-quality-pollutants-and-standards</p>		

Table IS-2: SMAQMD Significance Thresholds

	ROG ¹ (lbs/day)	NO _x (lbs/day)	CO (µg/m ³)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Construction (short-term)	None	85	CAAQS ²	80 ^{3*}	82 ^{3*}
Operational (long-term)	65	65	CAAQS	80 ^{3*}	82 ^{3*}
1. Reactive Organic Gas 2. California Ambient Air Quality Standards 3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.					

CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS

Short-term air quality impacts are mostly due to dust (PM₁₀ and PM_{2.5}) generated by construction and development activities, and emissions from equipment and vehicle engines (NO_x) operated during these activities. Dust generation is dependent on soil type and soil moisture, as well as the amount of total acreage actually involved in clearing, grubbing and grading activities. Clearing and earthmoving activities comprise the major source of construction dust generation, but traffic and general disturbance of the soil also contribute to the problem. Sand, lime or other fine particulate materials may be used during construction and stored on-site. If not stored properly, such materials could become airborne during periods of high winds. The effects of construction activities include increased dust fall and locally elevated levels of suspended particulates. PM₁₀ and PM_{2.5} are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

CONSTRUCTION PARTICULATE MATTER EMISSIONS

The SMAQMD Guide includes screening criteria for construction-related particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD’s construction PM₁₀ or PM_{2.5} thresholds of significance provided that the project does not:

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

Some PM₁₀ and PM_{2.5} emissions during project construction can be reduced through compliance with institutional requirements for dust abatement and erosion control. These institutional measures include the SMAQMD “District Rule 403-Fugitive Dust” and measures in the Sacramento County Code relating to land grading and erosion control [Title 16, Chapter 16.44, Section 16.44.090(K)].

The project site is less than 35 acres (1.9 acres) and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project falls below the SMAQMD Guide screening criteria for PM₁₀ and PM_{2.5}. The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. These requirements are already required by existing rules and regulations and have been included as mitigation.

CONSTRUCTION OZONE PRECURSOR EMISSIONS (NO_x)

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

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

The project site is less than 35 acres (1.9 acres) and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; import or export of soil materials requiring a considerable amount of haul truck activity; or soil disturbance of more than 15 acres per day. Therefore, the project falls below the SMAQMD Guide screening criteria for construction emissions related to ozone precursors.

The project would not exceed daily thresholds of significance for NO_x, PM₁₀, and PM_{2.5} with implementation of best management practices. Impacts related to construction-related emissions will be ***less than significant with mitigation***.

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. For ozone precursor emissions, the screening table in the SMAQMD Guide allows users to screen out projects that include up to 740 new dwelling units for residential, mid-rise (3-10 stories) apartment projects. For particulate matter emissions, the screening table allows users to screen out projects that include up to 1,485 new dwelling units. The proposed project consists of 39 dwelling units, and therefore falls below these screening thresholds. Impacts related to operational emissions are ***less than significant***.

CRITERIA POLLUTANT HEALTH RISKS

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

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

HEALTH EFFECTS SCREENING

In order to estimate the potential health risks that could result from the operational emissions of ROG, NO_x, and PM_{2.5}, PER staff implemented the procedures within SMAQMD's *Instructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools* (SMAQMD's Instructions). To date, SMAQMD

has published three options for analyzing projects: small projects may use the Minor Project Health Screening Tool, while larger projects may use the Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

Both the Minor Project Health Screening Tool and Strategic Area Project Health Screening Tool are based on the maximum thresholds of significance adopted within the five air district regions contemplated within SMAQMD's *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (SMAQMD's Friant Guidance; October 2020). The air district thresholds considered in SMAQMD's Friant Guidance included thresholds from SMAQMD as well as the El Dorado County Air Quality Management District, the Feather River Air Quality Management District, the Placer County Air Pollution Control District, and the Yolo Solano Air Quality Management District. The highest allowable emission rates of NO_x, ROG, PM₁₀, 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

The project site is located adjacent to Business 80. 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-3 and Table IS-4.

Table IS-3: 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	0.69	0.62	0.0034%	18,419
Hospital Admissions, Asthma	0 - 64	0.045	0.041	0.0022%	1,846
Hospital Admissions, All Respiratory	65 - 99	0.22	0.19	0.00095%	19,644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.12	0.10	0.00043%	24,037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000056	0.000049	0.0013%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0051	0.0046	0.0015%	308

Acute Myocardial Infarction, Nonfatal	45 - 54	0.013	0.012	0.0016%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.021	0.019	0.0015%	1,239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.073	0.066	0.0013%	5,052
Mortality					
Mortality, All Cause	30 - 99	1.4	1.2	0.0027%	44,766
Notes:					
<ol style="list-style-type: none"> 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 <i>Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District</i>. 					

Table IS-4: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.042	0.030	0.00016%	19,644
Emergency Room Visits, Asthma	0 - 17	0.19	0.15	0.0025%	5,859
Emergency Room Visits, Asthma	18 - 99	0.30	0.23	0.0018%	12,560
Mortality					
Mortality, Non-Accidental	0 - 99	0.025	0.020	0.000064%	30,386
Notes:					
<ol style="list-style-type: none"> 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 <i>Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District</i>. 					

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

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

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

NOISE

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

- Result in 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.

NOISE TERMINOLOGY AND FUNDAMENTALS

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

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

humans are to that particular frequency. Using this method, low and extremely high frequency sounds are given less weight, or importance, while mid-range frequencies are given more weight, because humans can hear mid-range frequencies much better than low and very high frequencies. This method is called “A” weighting, and the units of measurement are called dBA (A-weighted decibel level). In practice, noise is usually measured with a meter that includes an electrical “filter” that converts the sound to dBA. The threshold at which one hears sounds is considered to be zero (0) dBA. The range of sound in normal human experience is 0 to 140 dBA. Decibels and other technical terms are defined in Table IS-5.

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

Table IS-5: Noise Terminology

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

The California Supreme Court issued an opinion in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) holding that CEQA is primarily concerned with the impacts of a project on the environment and generally does not require agencies to analyze the impact of existing conditions on a project's future users or residents. Nevertheless, the County of Sacramento has policies that address existing/future conditions affecting the proposed project, which are discussed in the following section.

COUNTY GENERAL PLAN NOISE ELEMENT

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

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

NO-1. The noise level standards for noise-sensitive areas of *new* uses affected by traffic or railroad noise sources in Sacramento County are shown by Table 1 (Table IS-6 of this report). Where the noise level standards of Table 1 are predicted to be exceeded at new uses proposed within Sacramento County which are affected by traffic or railroad noise, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 1 standards (reference Table IS-6).

Table IS-6: Noise Standards for New Uses Affected by Traffic and Railroad Noise

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

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

EXISTING NOISE SETTING

The project site is located immediately east of northbound Business 80. Traffic noise along Business 80 is the primary contributor to existing noise levels. There is an existing sound wall between Business 80 and the project site.

METHODOLOGY

Bollard Acoustical Consultants, Inc. (Bollard) was retained by the applicant to prepare a noise assessment (Appendix A). The intent of the assessment was to determine noise levels at the project site from automotive traffic along Business 80 and provide noise reduction recommendations where necessary.

Bollard conducted long-term (72-hour) ambient noise level measurements on the project site from January 29-31, 2023. A Larson Davis Laboratories (LDL) Model 820 precision integrating sound level meter was placed along the eastern property line, towards the center of the parcel (reference Plate IS-3). The sound level meter was used to complete

the long-term ambient noise level survey. The results of the survey are shown Table IS-7.

Table IS-7: Summary of Bollard’s Long-Term Ambient Noise Survey Results

		Average Measured Hourly Noise Levels (dB) ¹			
		Daytime		Nighttime	
Date	DNL ² (dB)	L _{eq}	L _{max}	L _{eq}	L _{max}
Jan. 29	59	54	67	52	65
Jan. 30	63	60	74	55	68
Jan. 31	60	53	67	53	65

¹ Daytime: 7:00 a.m. to 10:00 p.m.; Nighttime: 10:00 p.m. to 7:00 a.m.
² Day-night average
Source: Bollard Acoustical Consultants, Inc. 2023.

The average measured hourly noise levels ranged from 53-60 dB during daytime hours (7am – 10pm) and 52-55 dB during nighttime hours (10pm – 7am). The combined averages noise levels ranged from 59-63 dB over the three-day survey period.

Plate IS-3: Noise Level Receiver Locations



PREDICTED FUTURE TRAFFIC NOISE LEVELS AT PROPOSED RESIDENTIAL USES

The Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA-RD-77-108) was used with future traffic data to predict future Business 80 traffic noise levels at the proposed residential uses of the development. The model is based upon the CALVENO noise emission factors for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA Model was developed to predict hourly L_{eq} values for free-flowing traffic conditions and is accurate within 1.5 dB in most situations.

The FHWA Model was used with future traffic data to predict future Business 80 traffic noise levels at the proposed residential uses of the development. According to published Caltrans traffic counts (2019), the segment of Business 80 adjacent to the project site currently experiences an average daily traffic (ADT) of approximately 159,000 vehicles. Future Business 80 average daily traffic volumes were conservatively assumed to increase by a factor of 1.5 in the future relative to existing volumes. Based on the information above, future Business 80 traffic noise levels were predicted at the project site at the results of those predictions are summarized in Table IS-8.

The results presented in Table IS-8 include offsets based on the results from long-term ambient noise level survey (Table IS-7), which account for shielding of Business 80 traffic provided by the existing traffic noise barrier constructed adjacent to the project site. Table IS-8 data also include offsets based on the results from short-term noise measurements conducted at the project site on February 1, 2023. While the long-term survey was taken from a single point on the eastern end of the project site, the short-term survey took measurements at each of the proposed building locations (reference Plate IS-3). Microphones were placed at heights of 5 feet, 15 feet, and 25 feet to establish the differences in traffic noise levels between ground level areas, which would be shielded from view of Business 80 by the existing traffic noise barrier and highway median, and elevated unshielded locations of the development.

Table IS-8: Predicted Future Exterior Business 80 Noise Levels at Project Site

Location	Receiver Description ²	Future Exterior DNL (dB) ³
Playground / Tot Lot	Primary common outdoor area	62
	1 st floor building facade	68
Building A	2 nd floor building facade	70
	3 rd floor building facade	80
	1 st floor building facade	64
Building B	2 nd floor building facade	66
	3 rd floor building facade	68
	1 st floor building facade	62
Building C	2 nd floor building facade	64
	3 rd floor building facade	66

Building D	1 st floor building facade	59
	2 nd floor building facade	61
<p>¹ A complete listing of FHWA Model inputs and results are provided as Appendix E of Noise Study. ² Receiver locations are shown in Figure 2. ³ Predicted future exterior traffic noise levels include offsets based on results from both short- and long-term ambient noise level surveys at the project site, which include consideration of the existing traffic noise barrier and highway median adjacent to the project site, as discussed.</p> <p><i>Source: Bollard Acoustical Consultants, Inc. 2023.</i></p>		

DISCUSSION OF FUTURE EXTERIOR NOISE IMPACTS

The General Plan defines sensitive multi-family residential uses as: common outdoor recreation areas, such as pools, tot-lots, tennis courts, etc. Individual patios and balconies of multi-family developments are not considered to be sensitive outdoor areas. As indicated in Table IS-7 and Table IS-8, existing ambient noise levels and future Business 80 traffic noise level exposure at the primary common outdoor area of the development (playground / tot lot) is predicted to comply with the Sacramento County General Plan 65 dB DNL exterior noise level standard for residential uses. As a result, additional consideration of traffic noise minimization measures relative to the General Plan 65 dB DNL exterior noise level standard would not be warranted for the project.

DISCUSSION OF FUTURE INTERIOR NOISE IMPACTS

Standard residential construction (stucco siding, STC-27 windows, door weather-stripping, exterior wall insulation, composition plywood roof), typically results in an exterior to interior noise reduction of approximately 25 dB with windows closed and approximately 15 dB with windows open. Provided future Business 80 traffic noise levels do not exceed 70 dB DNL at exterior building facades, standard residential construction practices as identified above should be adequate to ensure compliance with the Sacramento County General Plan 45 dB DNL interior noise level standard for the majority of the project buildings. The third floor of Building A (northern-most building) is the only façade with an exterior noise level higher than 70 dB. The anticipated future exterior noise level was estimated to be 80 dB.

Bollard’s report recommended the following STC ratings for the third floor of Building A:

- STC 40 windows & doors for the north and western façades
- STC 34 windows & doors windows on the western half of the south facade
- STC 32 windows & doors on the eastern half of the south facade.

The recommendations have been incorporated as a condition of approval for the project. Compliance with the conditions of approval will ensure that the County residential noise level (45 dB) is met.

INCREASES IN TRAFFIC NOISE LEVELS DUE TO THE PROJECT

According to the provided site plans, the proposed development will be accessed from Cleo Way via Red Robin Lane. As a result, the greatest impact from project-generated off-site traffic will be along Cleo Way and Red Robin Lane. Based on the results from the Bollard ambient noise level survey, measured day-night average noise levels within the vicinity of those roadways ranged from 59 to 63 dB DNL. For the purpose of this analysis, it was conservatively assumed that the existing ambient noise level environment at the existing noise-sensitive uses along Cleo Way and Red Robin Lane (residences) is 55 dB DNL. The nearest existing residences along Cleo Way and Rd Robin Lane maintain a separation of approximately 50 feet from the roadway centerlines.

The project is proposing 39 residential apartment units. According to ITE, multi-family housing (ITE code 22) generate approximately 7.3 daily trips per unit. Assuming all 39 proposed apartment units would generate 7.3 trips per day, project-generated traffic noise level exposure is predicted to be 47 dB DNL at the nearest existing residences along Cleo Way and Red Robin Lane (50 feet from roadway centerlines).

Pursuant to the Federal Interagency Commission on Noise (FICON), an impact would be significant impact if project-generated off-site traffic would substantially increase noise levels at existing sensitive receptors in the vicinity. Where existing ambient noise levels are less than 60 dB DNL, a +5 dB DNL increase in noise levels shall be considered significant.

Based on the analysis and results provided above, the project-related increase in traffic noise level exposure along roadways located within the immediate project vicinity is calculated to be 1.6dB DNL. Because project-related traffic is not predicted to result in increases in ambient noise levels that would exceed the applicable FICON increase significance criteria at existing sensitive uses within the project vicinity, this impact is identified as being ***less than significant***.

CONSTRUCTION RELATED NOISE

During project construction, heavy equipment would be used for grading excavation, paving, and building construction, which would increase ambient noise levels when in use. Noise levels would vary depending on the type of equipment used, how it is operated, and how well it is maintained. Noise exposure at any single point outside the project work area would also vary depending upon the proximity of equipment activities to that point.

General Plan Policy NO-8 states, "Noise associated with construction activities shall adhere to the County Code requirements. Specifically, Section 6.68.090(e) addresses construction noise within the County".

Sacramento County Code Section 6.68.090 exempts the following activities from the noise ordinance:

e. Noise sources associated with construction, repair, remodeling, demolition, paving, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 6:00 a.m. on weekdays and Friday commencing at 8:00 p.m. through and including 7:00 a.m. on Saturday; Saturdays commencing at 8:00 p.m. through and including 7:00 a.m. on the next following Sunday and on each Sunday after the hour of 8:00 p.m. Provided, however, when an unforeseen or unavoidable condition occurs during a construction project and the nature of the project necessitates that work in process be continued until a specific phase is completed, the contractor or owner shall be allowed to continue work after 8:00 p.m. and to operate machinery and equipment necessary until completion of the specific work in progress can be brought to conclusion under conditions which will not jeopardize inspection acceptance or create undue financial hardships for the contractor or owner.

DISCUSSION OF PROJECT IMPACTS

Proposed construction activities would occur within 50 feet of the nearest outdoor activity areas of the nearest existing residences, which are located to the east of the project site.

The range of maximum noise levels for various types of construction equipment at a distance of 50 feet is presented in Table IS-9. It should be noted that not all of these construction activities would be required for this project. The noise values in Table IS-9 represent maximum noise generation, or full-power operation of the equipment. As one increases the distance between equipment, or increases separation of areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of combining separate noise sources.

Table IS-9: Construction Equipment Reference Noise Levels

Equipment	Reference Noise Level at 50 Feet (dB)	
Air compressor	80	
Backhoe	80	
Ballast equalizer	82	
Ballast tamper	83	
Compactor	82	
Concrete mixer	85	
Concrete pump	82	
Concrete vibrator	76	
Crane, mobile	83	
Dozer	85	
Excavator	85	
Generator	82	
Grader	85	
Impact wrench	85	
Loader	80	
Paver	85	
Pneumatic tool	85	
Pump	77	
Saw	76	
Scarifier	83	
Scraper	85	
Shovel	82	
Spike driver	77	
Tie cutter	84	
Tie handler	80	
Tie inserter	85	
Truck	84	
	Low	76
	High	85
	Average	82

Source: 2018 FTA Noise and Vibration Impact Assessment Manual, Table 7-1.

Policy NO-8 of the Sacramento County General Plan states that noise associated with construction activities shall adhere to requirements contained in County Code Section 6.68.090(e). Pursuant to Section 6.68.090(e), noise associated with construction activities is exempt provided that said activities do not occur during specific hours and days identified in the code section. It is reasonably assumed for the purposes of this analysis that all noise-generating on-site project construction equipment and activities would occur pursuant to County Code Section 6.68.090(e) and would thereby be exempt from County noise level criteria.

In terms of determining the temporary noise increase due to project-related construction activities, an impact would occur if construction activity would noticeably increase ambient noise levels above background levels. The threshold of perception of the human ear is approximately 3 to 5 dB – a 5 dB change is considered to be clearly noticeable. For this analysis, a noticeable increase in ambient noise levels is assumed

to occur where noise levels increase by 5 dB or more over existing ambient noise levels.

Average measured hourly maximum noise levels during the hours/days in which construction activity noise is exempted by County Code Section 6.68.090(e) ranged from 73 to 82 dB L_{max} (arithmetic mean of 82 dB L_{max}). Ambient plus project construction noise level exposure is calculated to be approximately 85 dB L_{max} at the nearest existing residential uses located 50 feet away. A calculated ambient plus project construction noise level of 85 dB L_{max} represents an increase of 3.1 dB L_{max} at the nearest existing residential uses, which is below the applied increase significance criterion of 5 dB. Impacts related to temporary increases to ambient noise levels are ***less than significant***.

HYDROLOGY AND WATER QUALITY

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

- Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area.
- 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.
- Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.
- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

ENVIRONMENTAL SETTING

CWE-RFE prepared a drainage study for the project dated March 28, 2023 and is utilized for this analysis (Appendix B). The project site is approximately 1.9 acres. The site is currently undeveloped and consists mostly of seasonal grasses and weeds. There are several trees located on the north side of the site. The site is relatively flat with the exception of a well-defined earthen drainage ditch which flows north to south, bisecting the project site. The drainage ditch terminus is located near the intersection of Cleo Way (undeveloped) and Red Robin Lane where the drainage is collected by a 24-inch corrugated metal pipe (CMP), which goes underground and connects to a manhole in Red Robin Lane.

The drainage ditch appears to collect and convey stormwater not only from on-site runoff but also from offsite runoff as well. There are two outfalls on the project site which are discharges from offsite drainage areas. One outfall is a 15-inch CMP pipe located on the north side of the site which discharges runoff collected from public storm drainage conveyances. The CMP enters the site from the east and appears to run

between the two single-family residences located at 2831 and 2837 Aurora Way. Based on available City of Sacramento and County of Sacramento utility information, as well as USGS lidar topographic data, the approximate upstream watershed area of is 13.61 acres tributary to this outfall location. An exhibit map SM-1 is provided in Appendix B which shows the approximate limits of the upstream shed area. The discharge from the 15-inch CMP flows overland and into the aforementioned drainage ditch where it is conveyed through the site.

LOCAL FLOODPLAIN

The project site is in a local flood hazard area, but not in a federally mapped floodplain. Sacramento County Department of Water Resources staff (Luis Rodriguez, March 15, 2024).

PROPOSED DRAINAGE IMPROVEMENTS

The proposed project would utilize existing drainage facilities and patterns, with minor modifications to each. The proposed project would construct five bioretention areas onsite and direct onsite drainage to bioretention areas located throughout the site, before connecting into the underground storm drain (reference Plate IS-4). The onsite drainage that is not able to be directed to one of the bioretention areas will be conveyed underground to a proprietary stormwater filtration structure to provide the necessary water quality treatment before discharging to the public storm drainage facilities. The stormfilter system will have an internal bypass structure to allow for higher intensity storms to bypass the filters continue flowing without backing up the system. Storm events that exceed the bioretention areas capacity will overtop into raised inlets within the bioretention areas which will connect into the onsite storm drain network.

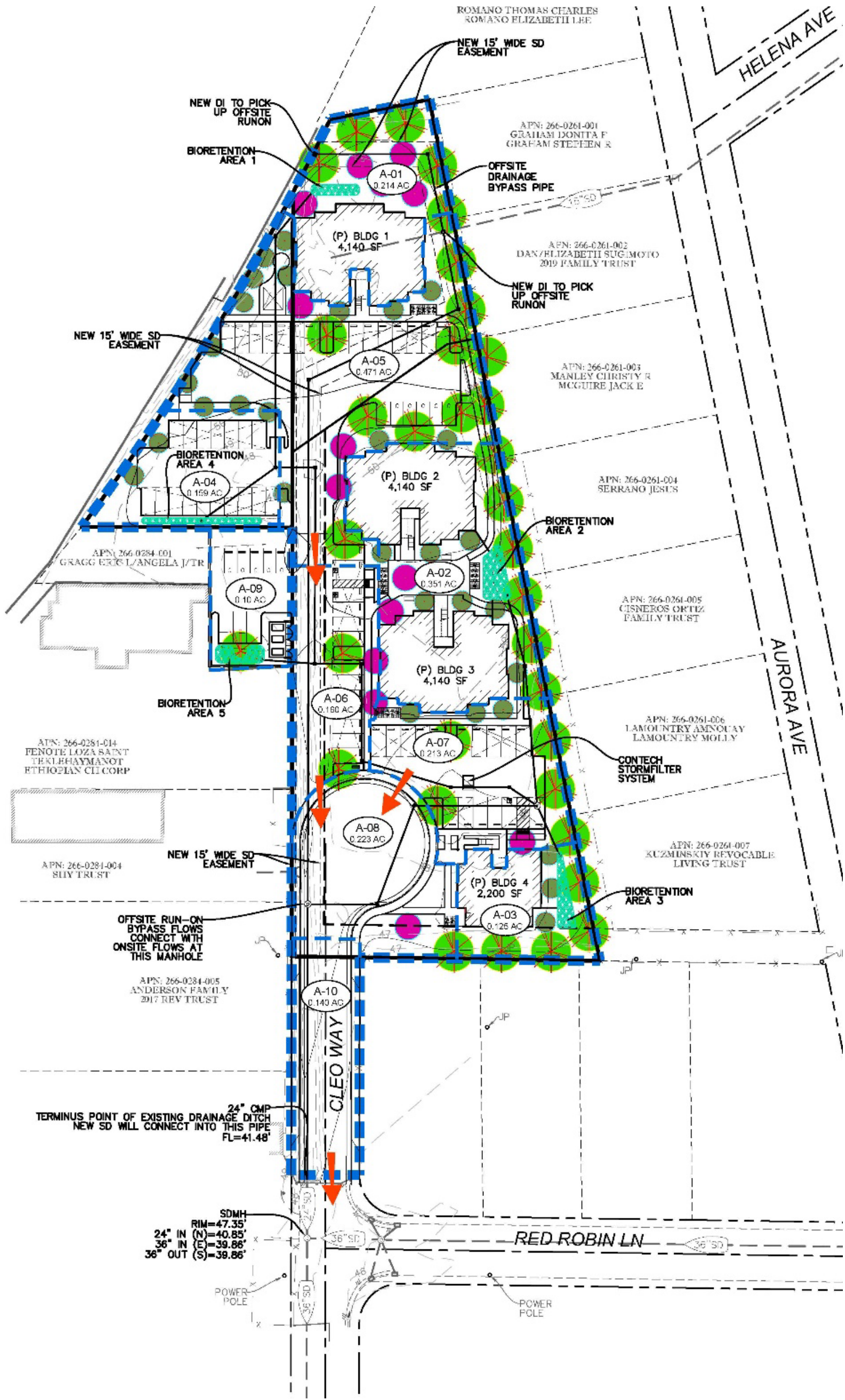
One key consideration for this project is to collect the runoff from the offsite areas and convey the runoff around the new development without intermingling with the onsite runoff. This will be done by installing a new drainage inlet directly in front of the Caltrans outfall location near the northwest corner of the site and a new inlet at the 15-inch corrugated metal pipe/storm drain east of proposed building #1. The existing onsite drainage ditch will be filled, and a 15-inch storm drain will connect to the two drainage inlets to convey offsite flows to the public storm drain system to the south. The drainage will be routed underground, around the new buildings and directed south to the connection to the existing 24-inch storm drain near the intersection of Cleo Way and Red Robin Lane. A new drainage easement will be dedicated for this public drainage conveyance through the private site. This public drainage will be completely isolated and separate from the onsite drainage and will not be provided with any water quality treatment or hydromodification.

Although technically onsite, the drainage from the new Cleo Way cul-de-sac will not be provided with water quality treatment. The drainage will be collected at inlets around the cul-de-sac and convey the runoff directly to the public storm drain.

DWR reviewed the Level 3 drainage study and approved it on March 13, 2024. The proposed project would not substantially alter the existing drainage pattern or

create/contribute to runoff that would exceed existing drainage facilities. Impacts are ***less than significant***.

Plate IS-4: Proposed Drainage Improvements



WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

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

Sacramento County has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by 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. The Project is proposing to direct on-site, overland flows to five bioretention basins around the site. Water entering the bioretention areas will be conveyed underground to a proprietary stormwater filtration structure for further water quality treatment before eventual discharge to the public storm drainage facilities to the south. Storm flows that exceed bioretention area capacity will overtop into raised inlets which will connect to the underground storm drain network, for further filtration and water quality treatment. Project compliance with requirements outlined above will ensure that project-related stormwater pollution impacts are ***less than significant***.

BIOLOGICAL RESOURCES

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

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

ENVIRONMENTAL SETTING

The project site consists of four parcels totaling approximately 1.9 acres. The western two parcels are bordered by Business 80 and a traffic sound wall. Site elevation ranges from 48-52 feet above mean sea level and slopes to the south. An advertising billboard is located within the southwestern parcel (APN: 266-0284-001-0000). Site vegetation consists of ornamentals grasses and weeds. The site has a total of 16 trees on site including 7 native oaks and 9 non-native tree species. A shallow, earthen drainage ditch extends from an outfall located beneath the Business 80 traffic sound wall at the northern end of the project. The ditch runs to the south, and its terminus is located near the intersection of Cleo Way (undeveloped) and Red Robin Lane, where the drainage is collected by a 24-inch CMP.

SPECIAL STATUS SPECIES

The 1.9 acres of undeveloped area, which is surrounded by urban development on all sides, would not provide suitable habitat for any special status species. While the site has trees along its northern and western perimeters, the trees are small and would not support nesting raptors. The trees have the potential to provide nesting habitat to smaller migratory nesting birds.

MIGRATORY NESTING BIRDS

The Migratory Bird Treaty Act of 1918, which states “unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill” a migratory bird. Section 3(18) of Federal Endangered Species Act defines the term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered “take.” To avoid take of nesting migratory birds, minimization measures have been included to require that activities, either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded.

Suitable nesting habitat is present in existing trees on the project site and adjacent properties. Preconstruction surveys for migratory nesting birds will be required if work is to commence between February 1 and September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting migratory birds, potentially resulting in nest abandonment or other harm to nesting success.

Impacts to migratory nesting birds are ***less than significant***.

SURFACE WATERS

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

Wetlands are regulated by both the federal and state governments, pursuant to the Clean Water Act Section 404 (federal) and Section 401 (state). The United States Army Corps of Engineers (Corps) is generally the lead agency for the federal permit process, and the Regional Water Quality Control Board (RWQCB) is generally the lead agency for the state permit process. The CWA protects all “navigable waters”, which are defined as traditional navigable waters that are or were used for commerce or may be used for interstate commerce; tributaries of covered waters; and wetlands adjacent to covered waters, including tributaries. Isolated wetlands, that is, those wetlands that are not hydrologically connected to other “navigable” surface waters (or their tributaries), are not considered to be subject to the CWA. On May 25, 2023, the U.S. Supreme Court narrowed the protections of the CWA. The Supreme Court opined,

The CWA’s use of ‘waters’ refers only to “geographic[al] features that are described in ordinary parlance as ‘streams, oceans, rivers, and lakes’” and to adjacent wetlands that are “indistinguishable” from those bodies of water due to a continuous surface connection. *Rapanos v. United States*, 547 U. S. 715, 755, 742, 739 (plurality opinion). To assert jurisdiction over an adjacent wetland under the CWA, a party must establish “first, that the adjacent [body of water constitutes] . . . ‘water[s] of the United States’ (i.e., a relatively permanent body of water connected to traditional interstate navigable waters); and second, that the

wetland has a continuous surface connection with that water, making it difficult to determine where the 'water' ends and the 'wetland' begins.

Although federal protections were narrowed by the Supreme Court, the state also has jurisdiction over impacts to surface waters through the Porter-Cologne Water Quality Control Act (Porter-Cologne), which does not require that waters be "navigable". For this reason, federal non-jurisdictional waters – isolated wetlands – can be regulated by the state of California pursuant to Porter-Cologne. In addition to Porter-Cologne, CDFW has purview over waters that have potential to support fish and wildlife resources under the Lake and Streambed Alteration Program, pursuant to Fish and Game Code Section 1602.

Section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake; or
- Substantially adversely affect associated fish and wildlife resources.

CDFW has the authority to issue a conditional Agreement for work to proceed.

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

There is no regulatory setback for other surface waters, but County Planning and Environmental Review has typically required a minimum 50-foot setback. Maintenance of these setbacks will avoid indirect impacts to the surface water. A direct impact is the filling or excavation of a surface water. If filling or excavation occurs within any portion of a vernal pool or seasonal wetland, the entire wetland should be considered directly impacted.

IMPACTS TO WATERS

An approximately 650-foot-long drainage ditch runs from the Caltrans outfall located along Interstate Business 80, near the northwest corner of the project site to a 24-inch corrugated metal pipe beneath Cleo Way to the south. The ditch conveys waters from Interstate 80 to public storm drainage systems beneath Cleo Way. The drainage ditch is an unlined, man-made feature. The ditch has grasses and emergent vegetation along its bottom and sides. Due to its shallow depth, intermittent flows, and the fully urbanized surroundings, the ditch would not provide habitat for any special-status species. The project is proposing to fill the entire length of the ditch and would be paved over for the proposed private drive for vehicle ingress/egress from Cleo Way.

The drainage ditch only receives water during storm events, and it is unlikely that it would be considered waters of the U.S., since it does not have “a continuous surface connection” with other federally jurisdictional waters. However, seasonal surface waters fall under state purview and the applicant would be required to submit a Waste Discharge Requirements (WDR) application to the Regional Water Board and secure necessary permit(s) for the work. Mitigation will require the applicant to submit a WDR application to the Regional Water Board and secure the necessary permit, prior to construction. The mitigation measure would also require the applicant to comply with the terms and conditions of the permit. Additionally, mitigation will require the applicant mitigate for any loss of wetlands not compensated through the permitting process consistent with County General Plan Policy CO-58.

The proposed work would not require a Notification of a Lake and Streambed Alteration be submitted to CDFW, since the project would not:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake; or
- Substantially adversely affect associated fish and wildlife resources.

Impacts to waters are ***less than significant with mitigation.***

NATIVE TREES

Sacramento County has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12 of the County Code) provides protections for landmark trees and heritage trees. The County Code defines a landmark tree as “an especially prominent or stately tree on any land in Sacramento County, including privately owned land” and a heritage tree as “native oak trees that are at or over 19” diameter at breast height (dbh).” Chapter 19.12 of the County Code, titled Tree Preservation and Protection, defines native oak trees as valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus*

douglasii), or oracle oak (*Quercus morehus*) and states that “it shall be the policy of the County to preserve all trees possible through its development review process.” It should be noted that to be considered a tree, as opposed to a seedling or sapling, the tree must have a diameter at breast height (dbh) of at least 6 inches or, if it has multiple trunks of less than 6 inches each, a combined dbh of 10 inches. The Sacramento County General Plan Conservation Element policies CO-138 and CO-139 also provide protections for native trees:

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

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

DISCUSSION OF PROJECT IMPACTS: NATIVE TREES

ONSITE NATIVE TREE REMOVAL

California Tree and Landscaping Consulting, Inc. (CaTLC) prepared an arborist report (Appendix C) for the project. There are seven native trees on the project site. Tree conditions range from “dead” to “fair”. The tree locations, arborist tag numbers, and condition are shown in Plate IS-5.

The project is proposing to remove six valley oaks (# 101, 112, 4063, 4065, 4073 & 4074) and retain one interior live oak (#103). Three of the trees (#112, 4073, & 4074) do not meet the 6-inch (dbh) or 10-inch (dbh) multi-stemmed-aggregate minimum for protection under General Plan Policy CO-138 and therefore, will not require compensatory mitigation. Tree numbers 103, 4063, and 4065 were classified as having major structure and health problems and would not require compensatory mitigation.

Tree #101 is listed in “fair” condition and is proposed for removal and would require equivalent replacement plantings. Tree #103 is proposed to be retained but construction would involve further grading and pavement within the dripline and critical root zone. As previously mentioned, the tree is classified as having major structure and health problems and would not require compensatory mitigation.

Removal of tree #101 would require equivalent compensation of 10 inches (dbh) of replacement plantings. Mitigation measure BIO-2 will ensure that compensation is provided for the removal of the tree. Impacts to native trees are ***less than significant with mitigation***.

Plate IS-5: Existing Tree Location, Condition, and Proposed Removals



Document Path: C:\Users\j\src\Desktop\Personal- net\CallowMaps 2022\SAC_2000 Helens ave\Template.mxd

TREE LOCATION & PROTECTION MAP

>Tree locations are approximate and were collected using apple iOS products.
>Property line information was downloaded from Sacramento County.

Property Line	Arborist Rating
Measured Tree Canopy	0 Dead
Tree Removals	1 Extreme Structure or Health Problems
Tree Protection Fencing	2 Major Structure or Health Problems
	3 Fair - Minor Problems
	4 Good - No Apparent Problems
	5 Excellent

ONSITE NATIVE TREE ENCROACHMENT

The filling in of the drainage ditch and construction of the concrete sidewalk would result in encroachment to the critical root zone and driplines of a valley oak (Tree # 103). Partial mitigation is applied to 6-inch (dbh) or larger native oak trees, when encroachment exceeds 20 percent of the dripline protection area, as defined by a circle using the distance from the trunk to the tip of the longest limb as a radius. The concept of partial mitigation stems from the fact that removal of more than 25-30 percent of a tree's root system or live canopy can result in early decline, if not death. The dripline protection area is the minimum protected area for a tree. A 20-percent encroachment threshold is utilized because of the difference between the extent of root systems and the minimum protected area. An encroachment of 20 percent of the dripline protection area will likely impact 25-30 percent of the root system, if not more. Therefore, the following encroachment thresholds are applied:

- Encroachment of 20 percent or less is considered a minor impact and does not require mitigation.
- Encroachment of more than 20 percent and less than 50 percent requires partial mitigation based on the percentage of encroachment multiplied by the impacted tree's dbh.
- Encroachment of 50 percent or more requires full mitigation for the tree.

PER staff calculated construction encroachment by georeferencing the civil plans submitted. Tree #103 is an interior live oak measuring 14 inches (dbh). The proposed improvements would result in approximately 31% encroachment to the tree and would require 5 inches (dbh) of compensation.

As proposed, native tree impacts from removal and encroachment total 15 inches (dbh). If additional trees are removed, equivalent compensatory plantings shall be required. Mitigation measure BIO-2 outlines requirements for native tree removal. Any native trees not proposed for removal shall follow the required mitigation measure for protection. With mitigation, impacts to native trees are ***less than significant***.

NON-NATIVE TREES

The Sacramento County General Plan Conservation and Environmental Justice Elements contain several policies aimed at preserving tree canopy within the County. These are:

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

public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.

- CO-147. Increase the number of trees planted within residential lots and within new and existing parking lots.
- CO-149. Trees planted within new or existing parking lots should utilize pervious cement and structured soils in a radius from the base of the tree necessary to maximize water infiltration sufficient to sustain the tree at full growth.
- EJ-23. The County will obtain equitable tree canopy in EJ Communities.
- EJ-24. Increase tree canopy coverage to at least 35 percent in all unincorporated County neighborhoods by 2040, especially those that are in Environmental Justice Communities.

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. The list includes more than seventy trees, so is not included here, but it is available at <http://www.planning.saccounty.gov/> under the “Environmental Documents CEQA/NEPA Overview heading. Policy CO-146 references the Greenprint program, which is run by the Sacramento Tree Foundation and has a goal of planting five million trees in the Sacramento region.

DISCUSSION OF NON-NATIVE TREE IMPACTS

There are 22 non-native trees on the project site. Tree conditions range from “dead” to fair”. The project is proposing to retain 10 trees (trees #s 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, and 4067). The remaining twelve trees would be removed. Trees with a condition of “dead” or “extreme” will not require replacement canopy when removed. Seven of these trees are classified as “dead” or “extreme” health problem (Tree #s 100, 500, 501, 502, 503, 4064, & 4070). The removal of tree numbers 4064, 4068, 4069, 4071, & 4072 would result in the removal of approximately 4,662 square feet of existing canopy.

County General Plan Policy CO-145 would require the developer/project proponent to plant new tree canopy equivalent to the area (square feet) removed, using 15-year shade values. The project site is located within the West Arden-Arcade community, which is one of four designated Environmental Justice communities within the General Plan. Pursuant to the Implementation Measure for Policy EJ-23, an extra 25 percent of tree canopy replacement would be required. This would bring the total replacement canopy area to 5,827 square feet. The proposed landscaping plan shows approximately 9,004-square feet of proposed tree canopy, which exceeds the total replacement canopy required. Mitigation requiring the replacement of non-native tree canopy consistent with General Plan Policies is recommended. Impacts related to the removal of non-native trees are ***less than significant with mitigation.***

HAZARDS AND HAZARDOUS MATERIALS

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

- 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.
- Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials.

Sacramento County is responsible for enforcing the state regulations, both in the City of Sacramento and the County, governing hazardous waste generators, hazardous waste storage, and underground storage tanks (including inspections, enforcement and removals). The Sacramento County Environmental Management Department (EMD) is a certified local agency in accordance with Health and Safety Code section 101480. EMD regulates the use, storage and disposal of hazardous materials in Sacramento County by issuing permits, monitoring regulatory compliance, investigating complaints, and other enforcement activities. EMD also oversees remediation of certain contaminated sites resulting from leaking underground storage tanks.

The GeoTracker and EnviroStor databases are resources for identifying environmental data related to hazardous materials (including the location of leaking storage tanks, cleanup sites, disposal sites, monitoring wells, sites with hazardous waste permits and the status of such sites). The databases are maintained by the State Water Resources Control Board and the State Department of Toxic Substances Control (DTSC), respectively.

Common hazardous materials include petroleum and oil products, lead-based paints, pesticides, herbicides, and fertilizers. Until the mid-1980s, lead was an additive used in gasoline and other fuels. Lead particles were emitted via vehicle exhaust and aerially deposited along freeways and roads. Frequently traveled roads, such as freeways, commonly have higher concentrations of lead deposits within exposed soils near the pavement. The highest concentrations are typically within 10 feet of the roadway. Lead can be found up to 30 feet from the edge of the pavement, but at much lower concentrations (Department of Toxic Substances Control 2016). Disturbance of contaminated soils can result in exposure of these toxic particles via respiration or ingestion.

Pesticides and fertilizers were widely used after World War II. If uncovered and not remediated, residual chemicals can have an adverse effect on public health. Agricultural and related businesses often stockpile pesticides, petroleum products, fertilizers, paints, and other chemicals.

ENVIRONMENTAL SETTING

The site has never been developed apart from the placement of an advertising billboard. Surrounding uses include single family residential homes to the east; Business 80 to the west; a church to the south; and low-rise apartments to the south and southwest.

PER staff reviewed historical County aerial imagery to assess past land uses onsite and in the surrounding area. The earliest aerial, from 1937, shows the lot undeveloped with large-lot, single-family homes located to the north, east, and west. The nearest home to the site was approximately 650 feet west of the project site. The aerial does not show any evidence of agricultural uses within one mile of the project site.

The next available aerial, from 1953, shows a drastic change in land use with small-lot, single-family homes every direction. Many of these homes still exist, including those adjacent to the project site on the east and south.

PER staff reviewed the GeoTracker and EnviroStor databases on July 11th, 2024. No records were found in either database on the project site or within 750 feet of the site.

DISCUSSION OF PROJECT IMPACTS: HAZARDOUS MATERIALS

AERIALLY DEPOSITED LEAD (ADL)

The project site is located adjacent to the northbound Interstate Business 80. Aerial imagery from 1953 confirms this section of highway was connected to Highway 160. The nearest proposed building would be located approximately 45 east of the Marconi Avenue offramp. Aerial imagery from 1968 shows the presence of a masonry wall between the site and the freeway. It's unclear when this wall was erected, so there is potential for the presence of ADL along the two western parcels and northeastern parcel of the project site. Additionally, a drainage outfall from the freeway directs flows onto the site which could have also conveyed ADL onto the project site. Soil testing for the presence of ADL shall be required prior to the start of construction. If lead concentrations exceed the DTSC standard of 80mg/kg for lead in soil in a residential setting, the project proponent will need to provide a hazardous materials remediation plan to EMD. Additionally, samples above 50 mg/kg, may constitute a hazard to the safety of construction workers pursuant to Title 8, Section 1532.1 CCR. If samples exceed 50mg/kg, mitigation would require a lead compliance plan and lead awareness training. The contaminated soil would classify as California-hazardous waste if removed from the project site and would be required to be disposed of in a "Class I" landfill.

If the proposed project requires the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 *Information Advisory Clean Imported Fill Material*.

In conclusion, the project site may contain soils that have elevated concentrations of lead beyond Title 8, Section 1532.1 CCR, and should be handled as such pursuant to existing regulations and laws. Recommended mitigation includes soil testing for contaminants prior to construction. In the event contamination exceeds established

thresholds, the project proponent will submit a lead compliance plan to EMD for review and approval and construction workers will be given a lead awareness training. During construction, soils that are contaminated should be stockpiled for subsequent disposal characterization. Project impacts related to hazardous materials 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.

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

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.

management, water conservation programs, open space planning, and sustainable agriculture programs.

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

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

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

Goals in the section on water include reducing water consumption, emphasizing water efficiency, reducing uncertainties in water supply by increasing the flexibility of the water allocation/distribution system, and emphasizing the importance of floodplain and open 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.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx>) but was placed on hold in late 2018 pending in-depth review of CAP-related litigation in other jurisdictions.

The commitment to a Communitywide CAP is identified in General Plan Policy LU-115 and associated Implementation Measures F through J on page 117 of the General Plan Land Use Element. This commitment was made in part due to the County’s General Plan Update process and potential expansion of the Urban Policy Area to accommodate new growth areas. General Plan Policies LU-119 and LU-120 were developed with SACOG to be consistent with smart growth policies in the SACOG Blueprint, which are intended to reduce VMT and GHG emissions. This second phase CAP is intended to flesh out the strategies involved in the strategy and framework CAP, and will include economic analysis, intensive vetting with all internal departments, community outreach/information sharing, timelines, and detailed performance measures.

The Phase 2B CAP was re-initiated in early 2020. In March of 2021, the draft Phase 2B CAP was released by the County for public review. On September 7, 2021, a Final Draft CAP and Addendum to the 2030 General Plan EIR was released for public review. The County revised the CAP a second time and released the Revised Final Draft CAP and Revised Addendum to the 2030 General Plan EIR on February 17, 2022. These documents were presented at a Board of Supervisors workshop on March 23, 2022. The County received more than 85 comment letters on the Revised Final Draft CAP leading up to the Board workshop on March 23, 2022. Based on comments received, Sacramento County revised the CAP and prepared a Subsequent Environmental Impact Report (SEIR) analyzing the potential impacts of the revised CAP. The draft SEIR was distributed for public review on July 15, 2024. It is anticipated that the CAP will be presented to the Board of Supervisors for approval on November 6, 2024.

THRESHOLDS OF SIGNIFICANCE

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

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

All projects must implement Tier 1 Best Management Practices to demonstrate consistency with the Climate Change Scoping Plan. After implementation of Tier 1 Best Management Practices, project emissions are compared to the operational land use screening levels table (equivalent to 1,100 metric tons of CO₂e per year). If a project's operational emissions are less than or equal to 1,100 metric tons of CO₂e per year after implementation of Tier 1 Best Management Practices, the project will result in a less than cumulatively considerable contribution and has no further action. Tier 1 Best Management Practices include:

- BMP 1 – no natural gas: projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 – electric vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards.
 - EV Capable requires the installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from

damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)

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

Projects that implement BMP 1 and BMP 2 can utilize the screening criteria for operation emissions outlined in Table IS-10. 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-10.

Table IS-10: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	10,000 metric tons per year

PROJECT IMPACTS

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

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

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

The project will implement BMP 1 and BMP 2 in its entirety. As such, the project can be compared to the operational screening table. The operational emissions associated with

the project are less than 1,100 MT of CO₂e per year. Mitigation has been included such that the project will implement BMP 1 and BMP 2. The impacts from GHG emissions are ***less than significant with mitigation.***

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures 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 AQ-1: 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 BIO-1: MIGRATORY BIRD NEST PROTECTION

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

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and September 15, a survey for active migratory bird nests shall be conducted no more than 7 days prior to construction by a qualified biologist.
2. Trees slated for removal shall be removed during the period of September through January, in order to avoid the nesting season. Any trees that are to be removed during the nesting season, which is February through September, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.

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

MITIGATION MEASURE BIO-2: NATIVE OAK TREE REMOVAL

Tree #101 is proposed for removal and would require equivalent replacement plantings of 10 inches. Expected construction encroachment into tree #103 would require 5 inches. The removal and or encroachment of native oak trees shall be compensated for

by planting in-kind native trees equivalent of 15 inches dbh, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. Native oak trees include: valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. If additional trees are identified for removal during development of individual parcels, equivalent compensatory mitigation in the form of replacement plantings or in-lieu fee payment shall be required. Equivalent compensation of 15 inches (dbh) for road construction and inch for inch dbh compensation for removal of any native trees associated with individual parcel development shall be satisfied using the following ratios:

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

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

1. Method of irrigation
2. If planting in soils with a hardpan/duripan or claypan layer, include the Sacramento County Standard Tree Planting Detail L-1, including the 10-foot-deep boring hole to provide for adequate drainage
3. Planting, irrigation, and maintenance schedules;
4. Identification of the maintenance entity and a written agreement with that entity to provide care and irrigation of the trees for a 3-year establishment period, and to replace any of the replacement trees which do not survive during that period.

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

trees shall be 20 feet on-center. Examples of acceptable planting locations are publicly owned lands, common areas, and landscaped frontages (with adequate spacing). Generally unacceptable locations are utility easements (PUE, sewer, storm drains), under overhead utility lines, private yards of single-family lots (including front yards), and roadway medians.

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

MITIGATION MEASURE BIO-3: CONSTRUCTION PROTECTION FOR NATIVE TREES

Except for the trees removed and compensated for through Mitigation Measure B, Tree #103 and all portions of adjacent off-site native trees which have driplines that extend onto the project site, and all off-site native trees which may be impacted by utility installation and/or improvements associated with this project, shall be preserved and protected as follows:

1. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb shall constitute the dripline protection area of the tree. Limbs must not be cut back in order to change the dripline. The area beneath the dripline is a critical portion of the root zone and defines the minimum protected area of the tree. Removing limbs which make up the dripline does not change the protected area.
2. Chain link fencing or a similar protective barrier shall be installed at the limits of construction. The rest of the fencing shall be placed a minimum of one foot outside of the driplines of the native trees prior to initiating project construction, in order to avoid damage to the trees and their root system.
3. No signs, ropes, cables (except cables which may be installed by a certified arborist to provide limb support) or any other items shall be attached to the native trees.
4. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the driplines of the native trees.
5. Any soil disturbance (scraping, grading, trenching, and excavation) is to be avoided within the driplines of the native trees. Where this is necessary, an ISA Certified Arborist will provide specifications for this work, including methods for root pruning, backfill specifications and irrigation management guidelines.

6. All underground utilities and drain or irrigation lines shall be routed outside the driplines of native trees. Trenching within protected tree driplines is not permitted. If utility or irrigation lines must encroach upon the dripline, they should be tunneled or bored under the tree under the supervision of an ISA Certified Arborist.
7. If temporary haul or access roads must pass within the driplines of oak trees, a roadbed of six inches of mulch or gravel shall be created to protect the root zone. The roadbed shall be installed from outside of the dripline and while the soil is in a dry condition, if possible. The roadbed material shall be replenished as necessary to maintain a six-inch depth.
8. Drainage patterns on the site shall not be modified so that water collects or stands within, or is diverted across, the dripline of oak trees.
9. No sprinkler or irrigation system shall be installed in such a manner that it sprays water within the driplines of the oak trees.
10. Tree pruning that may be required for clearance during construction must be performed by an ISA Certified Arborist or Tree Worker and in accordance with the American National Standards Institute (ANSI) A300 pruning standards and the International Society of Arboriculture (ISA) "Tree Pruning Guidelines".
11. Landscaping beneath the oak trees may include non-plant materials such as boulders, decorative rock, wood chips, organic mulch, non-compacted decomposed granite, etc. Landscape materials shall be kept two (2) feet away from the base of the trunk. The only plant species which shall be planted within the driplines of the oak trees are those which are tolerant of the natural semi-arid environs of the trees. Limited drip irrigation approximately twice per summer is recommended for the understory plants.
12. Any fence/wall that will encroach into the dripline protection area of any protected tree shall be constructed using grade beam wall panels and posts or piers set no closer than 10 feet on center. Posts or piers shall be spaced in such a manner as to maximize the separation between the tree trunks and the posts or piers in order to reduce impacts to the trees.
13. For a project constructing during the months of June, July, August, and September, deep water trees by using a soaker hose (or a garden hose set to a trickle) that slowly applies water to the soil until water has penetrated at least one foot in depth. Sprinklers may be used to water deeply by watering until water begins to run off, then waiting at least an hour or two to resume watering (provided that the sprinkler is not wetting the tree's trunk. Deep water every 2 weeks and suspend watering 2 weeks between rain events of 1 inch or more.

MITIGATION MEASURE BIO-4: NON-NATIVE TREE CANOPY REPLACEMENT

Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the square footage of the non-native tree canopy removed. The removal of 12 trees would result in the loss 4,662 square feet of replacement tree canopy. Pursuant to the Implementation Measure for Policy EJ-23, an extra 25 percent of tree canopy replacement would be required. This would bring the total replacement canopy area to 5,827 square feet. New tree canopy area shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species. Replacement tree canopy shall be planted onsite.

MITIGATION MEASURE BIO-5: SURFACE WATERS

Prior to approval of the improvement plans or grading plan, whichever comes first, the applicant shall obtain all applicable permits and/or agreements (WDR) from the Central Valley Regional Water Quality Control Board. The applicant shall submit copies of all the permits/agreements to the Environmental Coordinator.

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

MITIGATION MEASURE HAZ-1: PHASE II ENVIRONMENTAL SITE

ASSESSMENT – SOIL TESTING

Prior to construction, perform a Phase II Environmental Site Assessment with soil testing for contaminants. A report with a summary of the findings should be submitted to County Planning and Environmental Review and County Environmental Management Department (EMD).

If soil testing results show concentrations above 50mg/kg, then a lead compliance plan and lead awareness training pursuant to Title 8 of the California Code of Regulations (Section 1532.1) shall be submitted to County EMD for review and approval. During construction, soils containing elevated lead shall be stockpiled for subsequent disposal determination in accordance with the lead compliance plan.

MITIGATION MEASURE GHG-1: GREENHOUSE GASES TIER 1 BMPs

Compliance with the Sacramento County Communitywide Climate Action Plan (CAP). If Sacramento County has adopted a Revised CAP that aligns with the long-term targets of AB 1279, compliance with provisions of the CAP may be applied.

-or-

The project is required to incorporate the Tier 1 Best Management Practices (BMPs) 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 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. CalGreen Tier 2 standards for multi-family residential projects require 20% of parking to be made EV Ready. The project proponent shall provide a minimum of two EV Ready parking spaces.
 - EV Capable requires the installation of “raceway” (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s).
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations.

MITIGATION MEASURE COMPLIANCE

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is **\$8,100.00**. This fee includes administrative costs of \$1,097.00.
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 would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation. Multi-family residential development is allowed in the BP (Business Professional Office) zoning district with issuance of a Conditional Use Permit. Upon approval of the project, the project would be consistent with environmental policies of the Sacramento County General Plan, Arden Arcade Community Plan, Sacramento County Zoning Code, and the City of Sacramento General Plan and 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 and is within an area designated for urban growth and uses.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and therefore, will not displace substantial amounts of existing housing.
3. AGRICULTURAL RESOURCES - Would the project:					

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production.
4. AESTHETICS - Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?				X	The project does not occur in the vicinity of any scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?				X	The project is not located in a non-urbanized area.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		Construction will not substantially degrade the visual character or quality of the project site. It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X	The project does not involve or affect air traffic movement.
6. PUBLIC SERVICES - Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The water service provider (Sacramento Suburban Water District) has adequate capacity to serve the water needs of the proposed project.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		The SacSewer 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		Minor extension of infrastructure would be necessary to serve the proposed project. Existing service lines are located within existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from service line extension.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located beneath Cleo Way and along Business 80. The extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing SMUD overhead powerlines traverse east to west at the southern boundary line along Aurora Way-Darwin Street Alley. The extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project would result in minor increases to student population; however, the increase would not require the construction/expansion of new unplanned school facilities. Established case law, <i>Goleta Union School District v. The Regents of the University of California</i> (36 Cal-App. 4 th 1121, 1995), indicates that school overcrowding, standing alone, is not a change in the physical conditions, and cannot be treated as an impact on the environment.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will result in increased demand for park and recreation services, but meeting this demand will not result in any substantial physical impacts.
7. TRANSPORTATION - Would the project:					

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		A residential project can be exempt from a VMT study if the site exists in a VMT efficient area based on an approved screening map. The project site is within a VMT efficient area which produces 85% or less VMT than the regional average according to the approved Sacramento Area Council of Governments (SACOG) Residential VMT Screening Map. Therefore, a VMT analysis for the proposed project is not required.
b. Result in a substantial adverse impact to access and/or circulation?			X		The project proposes to extend Cleo Way to the north approximately 105 feet, where it would end as a roundabout. A 25-foot-wide private access drive would extend from the end of Cleo Way providing access to the rest of the development. The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project would not result in a substantial adverse impact to public safety on area roadways. Conditions of approval will require project roadways and sidewalks to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
8. AIR QUALITY - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?		X			The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. 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 not result in emissions that exceed standards.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		The project would not expose sensitive receptors to pollutant concentrations in excess of standards. See Response 8.a. Refer to the AQ discussion in the Environmental Effects section above.
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 would not result in a temporary or permanent increase of ambient noise levels and would not result in exposure of persons to, or generation of, noise levels in excess of applicable standards. Refer to the Noise discussion in the Environmental Effects section above.

	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 these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. HYDROLOGY AND WATER QUALITY - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will incrementally add to groundwater consumption; however, the singular and cumulative impacts of the proposed project upon the groundwater decline in the project area are minor.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding. Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map. The project site is in a local flood hazard area, but not in a federally mapped floodplain. Compliance with the County Floodplain Management Ordinance, County Drainage Ordinance, and Improvement Standards will assure less than significant impacts. Refer to the Hydrology discussion in the Environmental Effects section above.

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?				X	No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site.
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			The site has an open drainage ditch that runs from the north to south. Flows stem from a drainage outfall along Interstate Business 80. The project would fill the ditch and pipe flows from Interstate Business 80. Refer to Biological Resources discussion in the Environmental Effects section above.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected.
e. Adversely affect or result in the removal of native or landmark trees?		X			Native trees occur on the project site; however, the project will not impact these trees. 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. Project is consistent with non-native tree removal policies. Refer to the Biological Resources discussion in the Environmental Effects section above.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?				X	There are no known conflicts with any approved plan for the conservation of habitat.
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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on an archaeological resource?			X		No known archaeological resources occur on-site.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		The project site is located outside any area considered sensitive for the existence of undiscovered human remains. No known human remains exist on the project site.
14. TRIBAL CULTURAL RESOURCES - Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes on March 14, 2024. Requests for consultation were not received. No known tribal cultural resources occur onsite.
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. The project site is located adjacent to Interstate Business 80 and was an active highway when leaded fuels were still in use. The site may contain concentrations of aerially deposited lead in the soil. Refer to Hazardous Materials discussion of the Environmental Effects section.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X	The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?				X	The project is not located on a known hazardous materials site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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 would increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are net resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X			The project will fully comply with the SMAQMD GHG Tier 1 BMPs. As such, the project screens out of further analysis and impacts are less than significant. Refer to the GHG discussion in the Environmental Effects section above.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	Medium Density Residential	X		
Community Plan	BP (Business Professional Office)	X		Arden-Arcade Community Plan
Land Use Zone	County: BP (Business Professional Office) City: R-1 (Single Family Residential 1-2 units/lot)	X		

INITIAL STUDY PREPARERS

Environmental Coordinator: Julie Newton
Senior Environmental Analyst: Alison Little
Environmental Analyst: Josh Greetan
Office Manager: Belinda Wekesa-Batts
Administrative Support: Justin Maulit

APPENDICES

Appendices are available to view at the Sacramento County Planning and Environmental Review, 827 7th Street, Sacramento, CA 95814, Room 225 during normal business hours, or online at:

<https://planningdocuments.saccounty.net/ViewProjectDetails.aspx?ControlNum=PLNP2022-00174>

Appendix A: Noise Study. Bollard Acoustical Consultants, March 2023.

Appendix B: Drainage Study. CWE RFE, March 2023.

Appendix C: Arborist Report. California Tree and Landscape Consulting, Inc., Dec. 2022.

REFERENCES

California Department of Toxic Substances Control, March 2016. *Community Update-Fact Sheet. Statewide Agreement for Caltrans for Reuse of Aerially Deposited Lead-Contaminated Soils.*

Sacramento Metropolitan Air Quality Management District and Ramboll U.S. Corporation. 2020. Greenhouse Gas Thresholds for Sacramento County.