



**ADDENDUM TO AN ADOPTED MITIGATED NEGATIVE DECLARATION**

The City of Sacramento, California, a municipal corporation, does hereby prepare, make declare, and publish the Addendum to an adopted Mitigated Negative Declaration (MND) for the following described project:

**Project Name and Number: River Oaks Marketplace Project (P19-012)**

**Approved Project Downtown Ford Auto Dealership Project (P04-106)**

The City of Sacramento, Community Development Department, has reviewed the proposed changes to the prior approved project and on the basis of the whole record before it, has determined that there is substantial evidence to support the determination that the attached original Mitigated Negative Declaration (MND) remains relevant in considering the environmental impacts of the proposed project changes and that there is no substantial evidence to support a fair argument that the changes to the project, as identified in the attached Addendum, may have a significant effect on the environment beyond that which was evaluated in the adopted MND. A subsequent EIR or MND is not required pursuant to the California Environmental Quality Act of 1970 (Public Resources Code Sections 21000, et seq. California).

This Addendum to the adopted MND has been prepared pursuant to Title 14, Sections 15162-15164 of the California Code of Regulations, and the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento.

A copy of this document and all supportive documentation may be reviewed or obtained on the City’s web site for environmental documents at:

<http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports.aspx>.

\_\_\_\_\_ for Date: 10-15-2020  
Tom Buford, Environmental Planning Services Manager

**River Oaks Marketplace Project (P19-012)**  
**Addendum to an Adopted Mitigated Negative Declaration (P04-106)**

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**File Number/Project Name:** River Oaks Marketplace Project (P19-012)

**Project Location:** The project site is located in Sacramento, California, approximately 80 miles east of San Francisco and 85 miles west of Lake Tahoe. Sacramento is a major transportation hub, the point of intersection of transportation routes that connect Sacramento to the San Francisco Bay area to the west, the Sierra Nevada mountains and Nevada to the east, Los Angeles to the south, and Oregon and the Pacific Northwest to the north.

The City is bisected by major freeways including Interstate 5 (I-5) that traverses the state from north to south; Interstate 80 (I-80), which provides an east-west connection between San Francisco and Reno; and U.S. Highway 50, which provides an east-west connection between Sacramento and South Lake Tahoe. Two railroads, the Union Pacific (UP) Railroad and the BNSF Railway transect Sacramento. **Figure 1** shows the location of the project site in the Sacramento region.

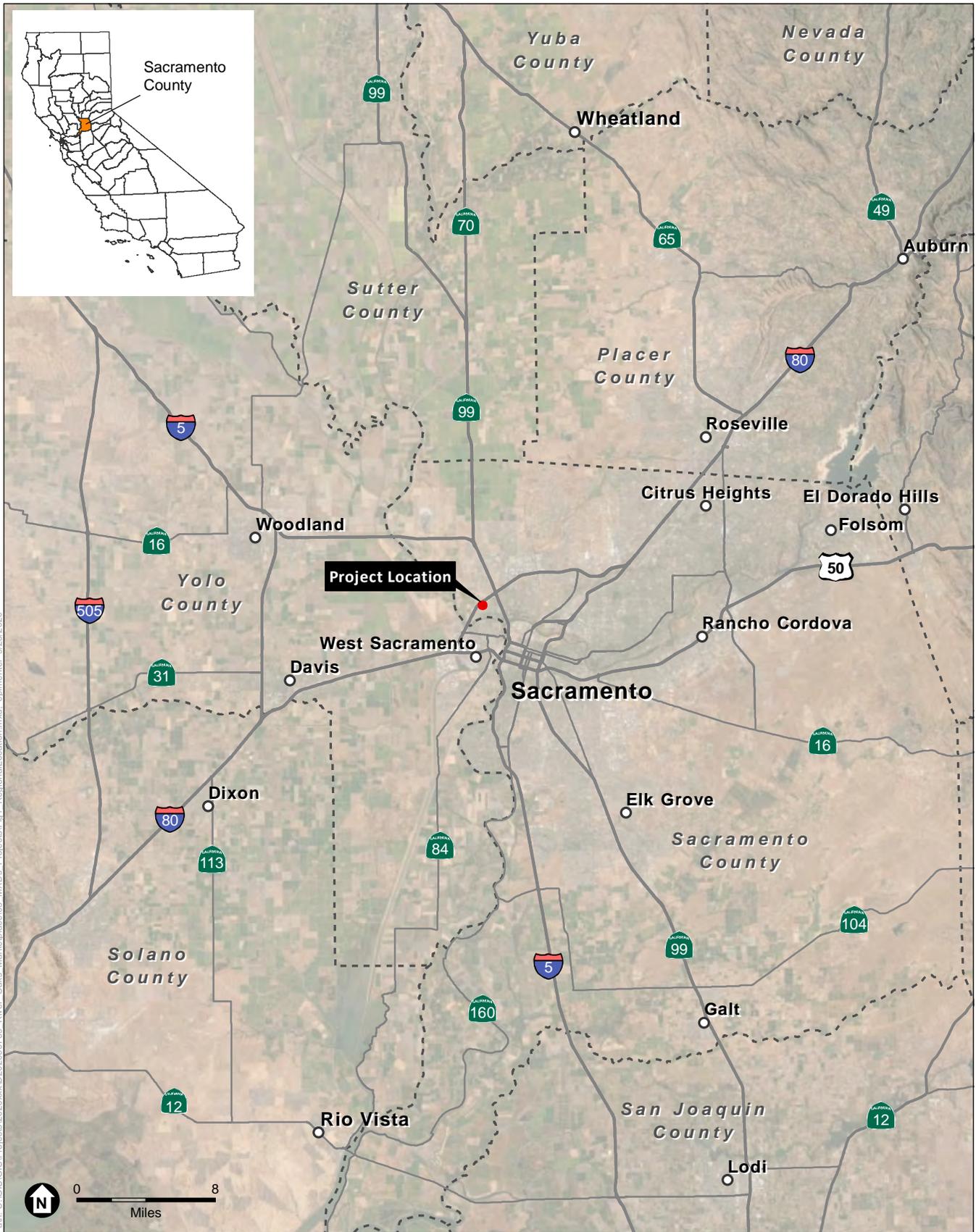
The 5.23-acre project site is located at the northwest corner of West El Camino Avenue and Orchard Lane, in the South Natomas Community Plan area, within the Park El Camino Planned Unit Development (PUD). The project site is vacant, and the zoning is C-2-PUD General Commercial – Planned Unit Development. The proposed project would be located south of and adjacent to The Core Natomas development, a 300-unit multi-family project currently under construction; west of The Cove, a new single-family residential development; north of an AM/PM convenience store and Arco gas station; and northwest of the Regatta Apartments.

The project site is the easternmost portion of Assessor's Parcel Number 225-0220-118-000. Recently, that parcel was split into two separate parcels (APNs 225-0220-123-0000 and 225-0220-124-0000), although the parcels are not yet recorded in the Sacramento Assessor's database. The proposed project site would be located on newly created APN 225-0220-124-0000, the eastern portion of the previously larger parcel.

**Figure 2** and **Figure 3** show the location of the project site within the South Natomas area of Sacramento and the project vicinity and site, respectively.

**Existing General Plan Designation and Zoning Designation:** The project site is zoned as C-2 PUD (General Commercial), which allows for a wide range of retail and commercial uses (see **Figure 4**).

The general plan designation for the project site is Suburban Center General Plan, which allows for the development of a variety of uses including retail, service, office, and residential uses; central public gathering places; and compatible public, quasi-public, and special uses (see **Figure 5**). The proposed project is consistent with the general plan land use designation.

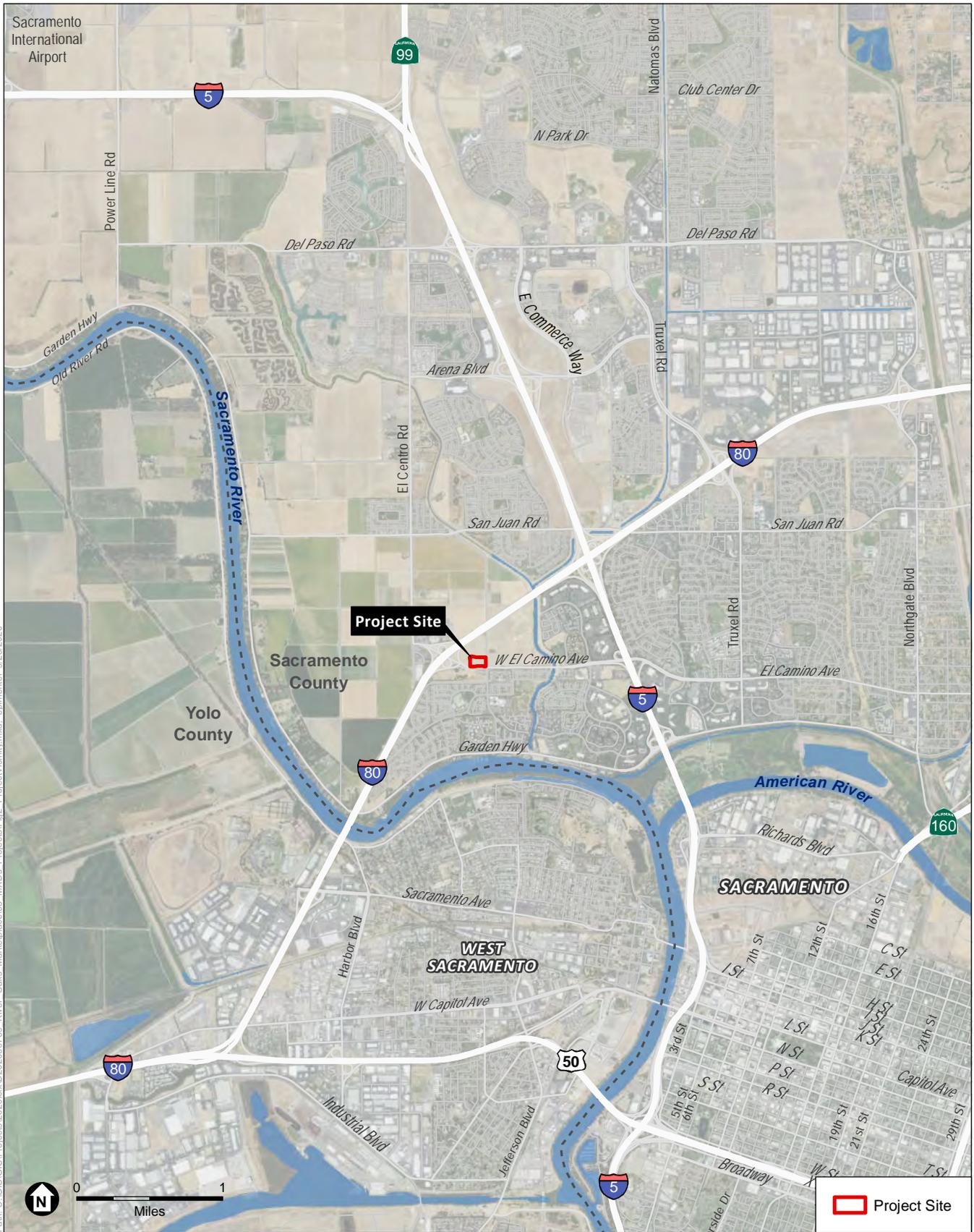


SOURCE: Esri, 2015; ESA, 2020

River Oaks Marketplace

**Figure 1**  
Regional Context





SOURCE: Esri, 2012; USDA, 2018; ESA, 2020

River Oaks Marketplace

**Figure 2**  
Location in South Natomas





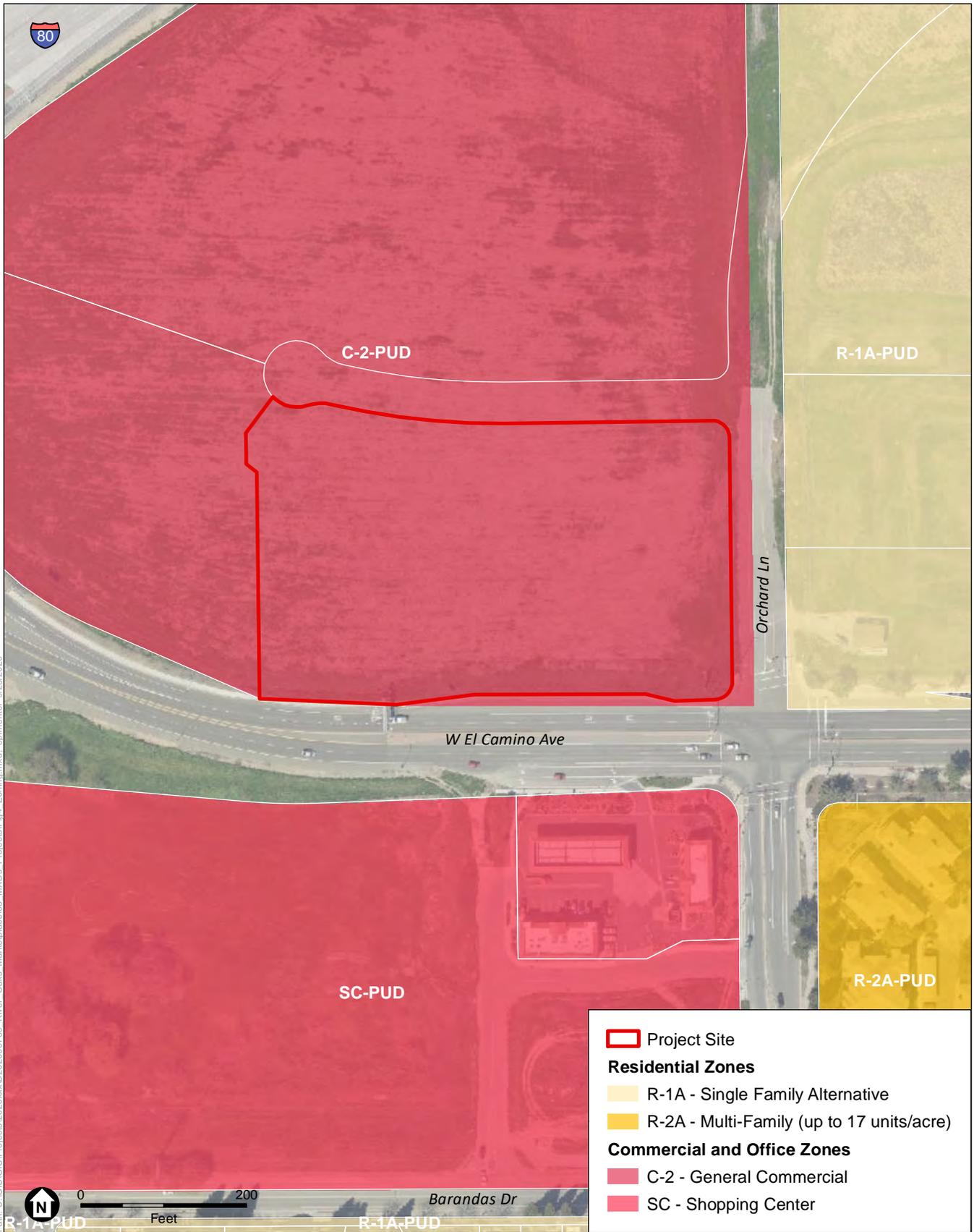
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SOURCE: Esri, 2016; ESA, 2020

River Oaks Marketplace

**Figure 3**  
Project Site

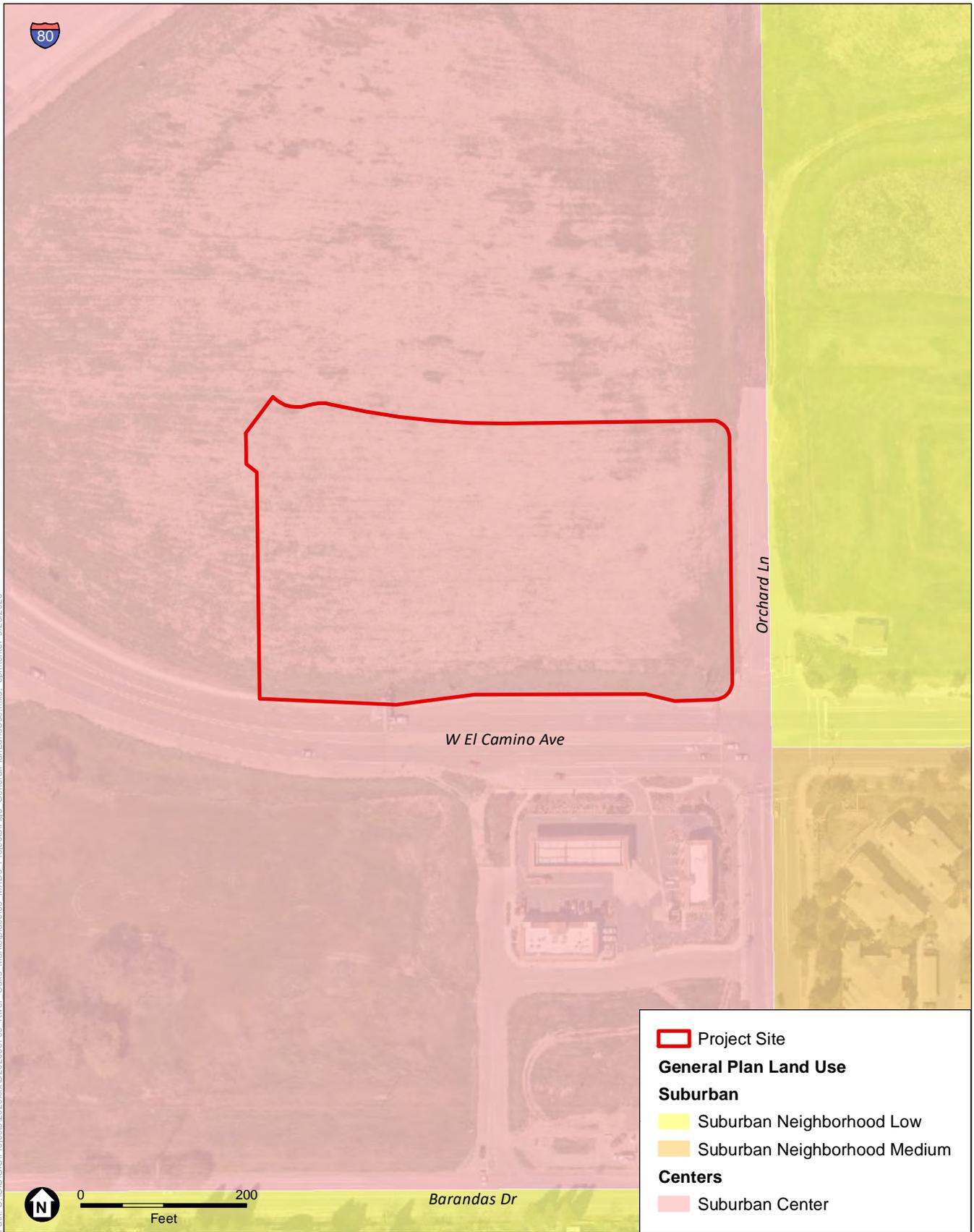




SOURCE: Esri, 2018; City of Sacramento, 2019; ESA, 2020

River Oaks Marketplace

**Figure 4**  
Zoning



SOURCE: Esri, 2018; City of Sacramento, 2019; ESA, 2020

River Oaks Marketplace

**Figure 5**  
General Plan Land Use

## Project Background

### Downtown Ford Auto Dealership Project

The project site was included in the development proposed in the Downtown Ford Auto Dealership project (P04-106). The Downtown Ford project included proposed development of an approximately 11.75-acre automobile dealership on the north side of the 20.4-acre area bounded by West El Camino Avenue to the south, Orchard Lane and land designated for residential development to the east, and I-80 to the north and west. The remaining 7.5 acres in the southern portion of the 20.4-acre area, which includes the project site, was proposed for a mix of office and retail uses, including the following:

- 42,000 square feet of office,
- 19,500 square feet of retail use, and
- 4,000 square feet of restaurant and gas station use.

The City approved a Mitigated Negative Declaration (Downtown Ford IS/MND) for the Downtown Ford Auto Dealership project on September 13, 2005 (Resolution No. 2005-674). No development has occurred on the project site.

### 2035 General Plan and 2035 General Plan Master EIR

In 2015, the City adopted the Sacramento 2035 General Plan and certified the Sacramento 2035 General Plan Master EIR, which maintained the Suburban Center land use designation for the project site.

### The Core Natomas

In 2018, the City approved a Mitigated Negative Declaration for The Core Natomas Project (P18-011) on the northern 12.33 acres of the 20.4-acre Downtown Ford Auto Dealership project site. The Core Natomas Project would develop a 300-unit luxury apartment complex, with associated amenities. Construction of The Core Natomas project is underway as of the date of preparation of this Addendum. The Core Natomas Project IS/MND did not propose changes to the land uses along West El Camino Avenue, as identified and analyzed in the Downtown Ford IS/MND, which remains the relevant CEQA document for the project site.

### 3171 West El Camino Avenue Lot Split

On January 30, 2020, the City's Zoning Administrator approved with conditions a Tentative Parcel Map with a Tentative Map Design Deviation for a non-standard, right-turn lane width for project Z19-113. The City's action subdivided the 7.53-acre parcel (APN 225-0220-118-000) into two parcels in the C-2-PUD (General Commercial – Park El Camino Planned Unit Development) zone. The project site includes the eastern of the two parcels, APNs 225-0220-123-000 and 225-0220-124-000, located adjacent to Orchard Lane and West El Camino Boulevard. APN 225-0220-124-000 is the project site.

## Flood Zone Designation

After re-evaluation of the levees by the US Army Corps of Engineers, FEMA remapped the Natomas Basin area into a floodplain with an AE flood zone designation in December 2008. The Natomas Basin, which includes the project site, was remapped as within the 100-year flood hazard zone (AE Zone). The remapping required all new construction or substantial improvements to structures to meet a 33-foot base flood elevation requirement.

Prior to the USACE decertification, the Sacramento Area Flood Control Agency (SAFCA) implemented the Natomas Levee Improvement Program (NLIP) to upgrade the levee system protecting the Natomas Basin. Construction of the NLIP began in 2007. However, the remap limited construction in the Natomas Basin to such an extent that it served as a de facto building moratorium.

In April 2015, FEMA approved an A99 flood zone designation for the Natomas Basin. An A99 designation is an interim flood zone designation that does not indicate the flood risk has been reduced, but allows construction in the area if certain conditions are met. Consistent with other areas within the Natomas Basin that had been proposed for development prior to the downgrading of flood zone designation for the Natomas Basin, reclassification to the A99 flood zone designation has led to new development proposals and renewal of previously halted development proposals. The project site has remained undeveloped up to the present.

## Project Description

### Project Components

The proposed project would subdivide the 5.23-acre project site into four separate parcels and would include the development of three commercial structures, including a 7-Eleven convenience market concept and fueling station, which would be co-located with a Laredo Taco Company Restaurant; McDonalds drive thru restaurant; and Dutch Bros. drive-thru coffee shop (see **Figure 6**). **Table 1** shows the development program for the proposed project, which would develop 4.45 net acres of the 5.23-acre site.

The proposed project would include 10,030 square feet (sf) of total commercial uses and would include 109 vehicle parking spaces and 12 bicycle parking spaces. **Figures 7 through 12** show site plan details and conceptual renderings for each proposed structure.



**TABLE 1  
DEVELOPMENT PROGRAM**

<b>Parcel</b>	<b>Use</b>	<b>Square Feet (GSF*)</b>	<b>Land Area (Acres)</b>	<b>Parking Spaces</b>
Parcel 1	7-Eleven Convenience Market, Fueling Station and Laredo Taco Company Restaurant	9,821 SF	1.48 acre	39 Vehicle Spaces 4 Bicycle Spaces
Parcel 2	McDonalds Drive-Thru Restaurant	4,755 SF	1.19 acre	35 Vehicle Spaces 4 Bicycle Spaces
Parcel 3	Dutch Bros. Drive-Thru Coffee Shop	1,442 SF	0.48 acre	12 Vehicle Spaces 4 Bicycle Spaces
Parcel A	Primary Driveways and Open Space Areas	---	1.30 acres	23 Vehicle Spaces
---	Public Road Dedication	---	0.85 acres	---
<b>Total</b>		<b>16,018 GSF</b>	<b>4.45 net acres 5.23 total acres</b>	<b>109 Vehicle Spaces 12 Bicycle Spaces</b>

## NOTES:

\* GSF – Gross Square Feet

### ***7-Eleven Convenience Market***

The 4,650-sf 7-Eleven convenience market concept would be constructed on Parcel 1, nearest to the El Camino Avenue/Orchard Avenue intersection, and would include a community market, a restaurant, restrooms, storage and office space, and 5 multi-product dispensers (MPDs) with 10 fuel pumps. The market and restaurant would also include a landscaped patio area for outdoor seating. The primary entrance to the structure would be on the west side, facing the parking and MPD facilities. A secondary entry would be located on the north side of the structure, providing access to and from the landscaped patio area. The single-story structure would have a height of approximately 24 feet and 3 inches above ground level. The proposed project does not include a request to sell alcohol at this facility.

### ***McDonalds Restaurant***

The 4,500-sf McDonalds development would be a single story structure. The proposed structure would have a height of approximately 20 feet and 10 inches above ground level. The McDonalds site would be laid out with primary access doors located on the south and southeast side of the structure, drive through facilities on the west side of the structure, and employee access on the north and northwest sides of the facility. Outdoor seating would be located to the southeast of the restaurant. Primary parking would be located on the east side of the structure and drive-through lanes would be located to the north and west of the proposed structure.

### ***Dutch Bros. Coffee Shop***

The Dutch Bros. facility would include approximately 880 sf of kitchen, employee restroom and office use. The structure would have a height of approximately 24 feet and 3 inches above ground level. The layout of the proposed structure would include a walk-up window on the east side of the structure, drive-through window on the west side of the structure and service entry/exits on the west and north sides of the structure. The Dutch Bros. site would have drive-through facilities located on the north, west, and south sides of the structure with parking located on the east side of the facility. Outdoor seating areas would be located on the north and south sides of the structure.

### ***Design***

Building facades would include painted exterior plaster and metal and stone veneer with standing seam metal roofs. Accessory elements such as trash enclosures, and outdoor seating areas would have a similar or complimentary appearance to the design palette of the three proposed buildings.

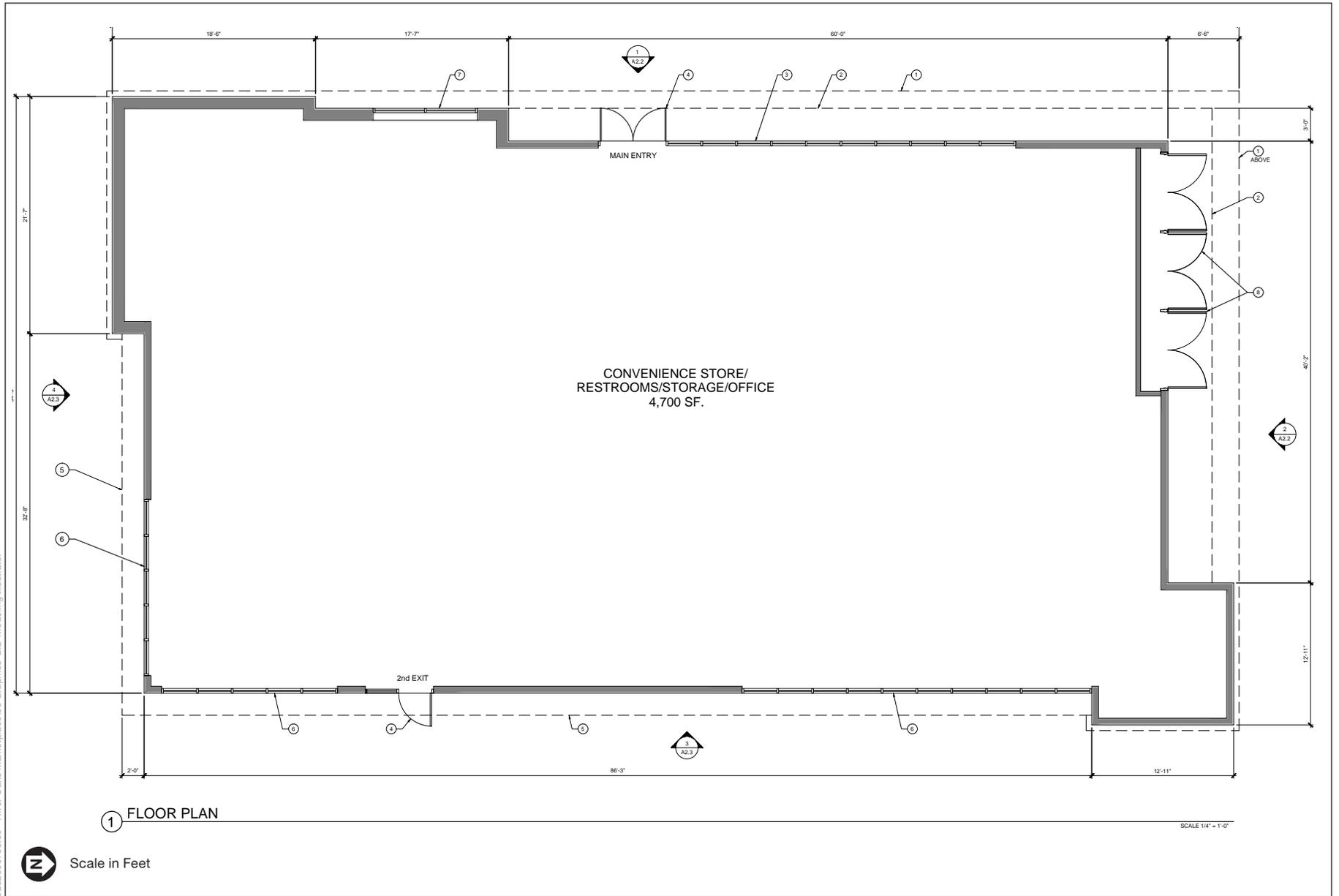
The project site would be lit by building perimeter lighting, emergency lighting, outdoor security lighting, landscape lighting, and interior lighting that would be visible from outside of buildings.

### **Site Layout and Site Circulation**

The project site would be laid out with proposed facilities located near the south side of the project site and primary vehicle circulation driveways, drainage facilities, and landscaped areas located toward the north. Three driveways would provide vehicle access to the project site via right-in-only driveway from westbound El Camino Avenue, and two full-access driveways on the Orchard Court cul-de-sac, which extends west from Orchard Lane, along the north side of the project site. A main north/south drive lane would run north/south from the right-in driveway from westbound West El Camino Avenue north to a second driveway along Orchard Court. A third driveway would be a secondary access point and provide ingress/egress access from the cul-de-sac on Orchard Court. The main north/south drive lane and east/west drive lane would provide vehicle access between each proposed facility and the project driveways.

Two stormwater detention ponds would be located in the landscaped areas fronting Orchard Court on each side of Driveway 2. Each of the three proposed uses would include trash facilities located away from primary structures in the parking areas. Parking spaces and pedestrian pathways would be interspersed throughout the project site.

The project site would include internal vehicular circulation, parking areas, drive-thru queuing lanes, and trash enclosures. Trash enclosures and bicycle parking have been located in strategic locations, both for ease of access and screening from neighboring properties.



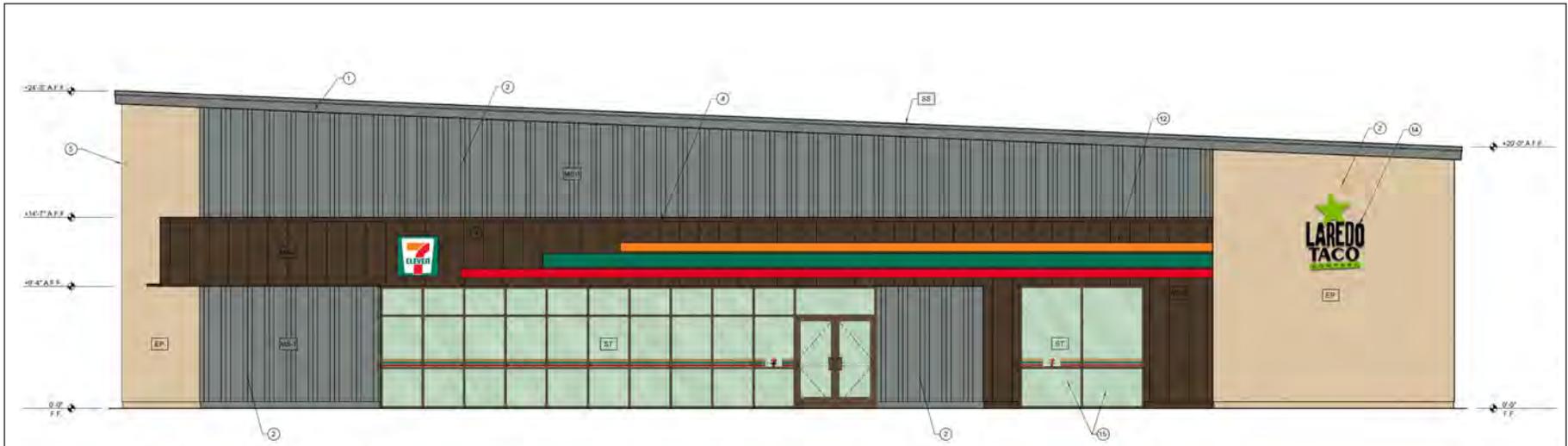
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SOURCE: FM Group Inc., 2020

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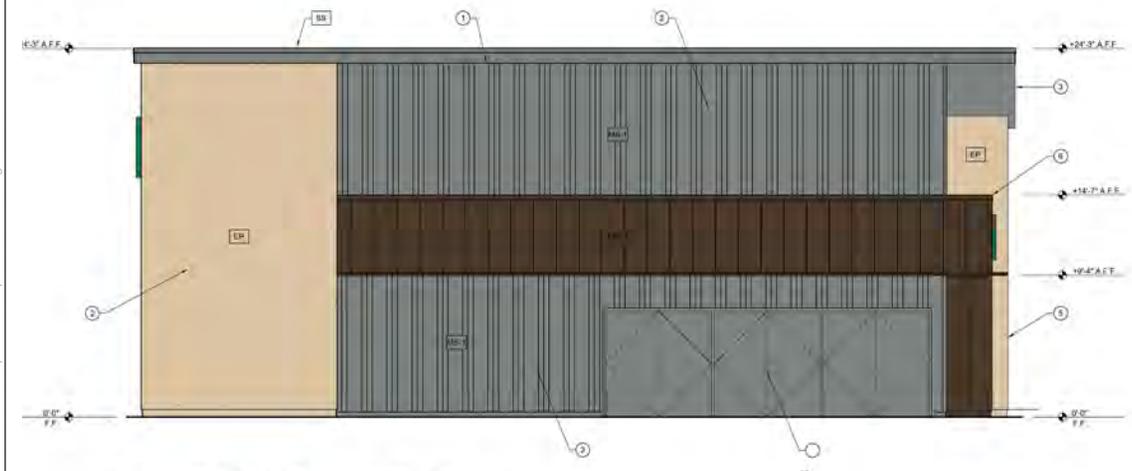
**Figure 7**  
7-Eleven Site Plan Detail





1 EXTERIOR WEST ELEVATION

SCALE 1/4" = 1'-0"



2 EXTERIOR NORTH ELEVATION

SCALE 1/4" = 1'-0"

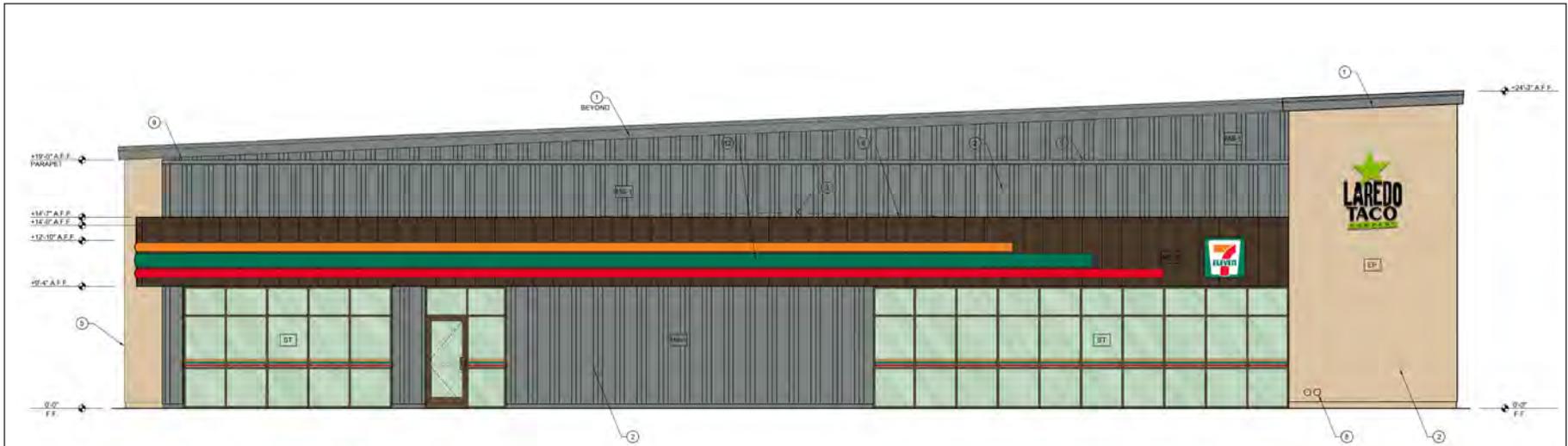
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SOURCE: FM Group Inc., 2020

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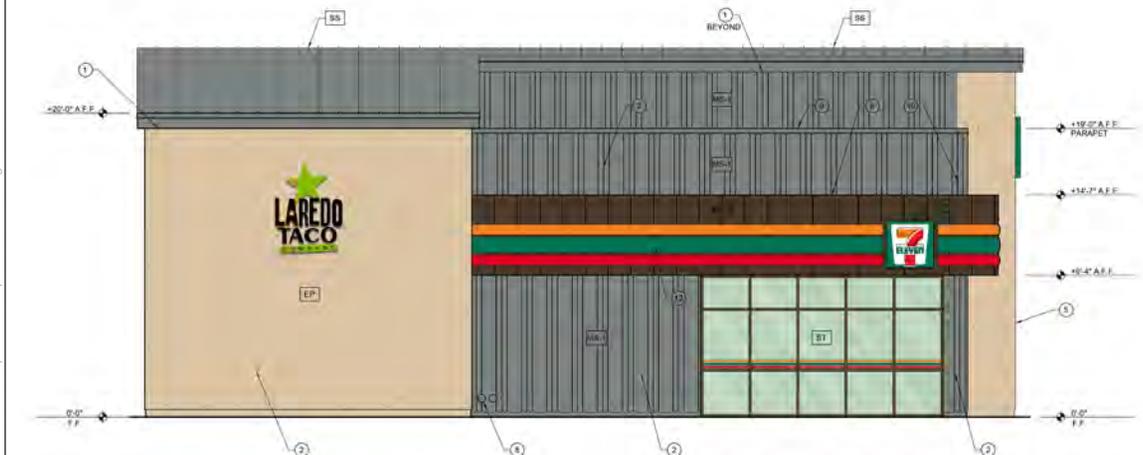
**Figure 8a**  
7-Eleven Elevations





3 EXTERIOR EAST ELEVATION

SCALE 1/4" = 1'-0"



4 EXTERIOR SOUTH ELEVATION

SCALE 1/4" = 1'-0"

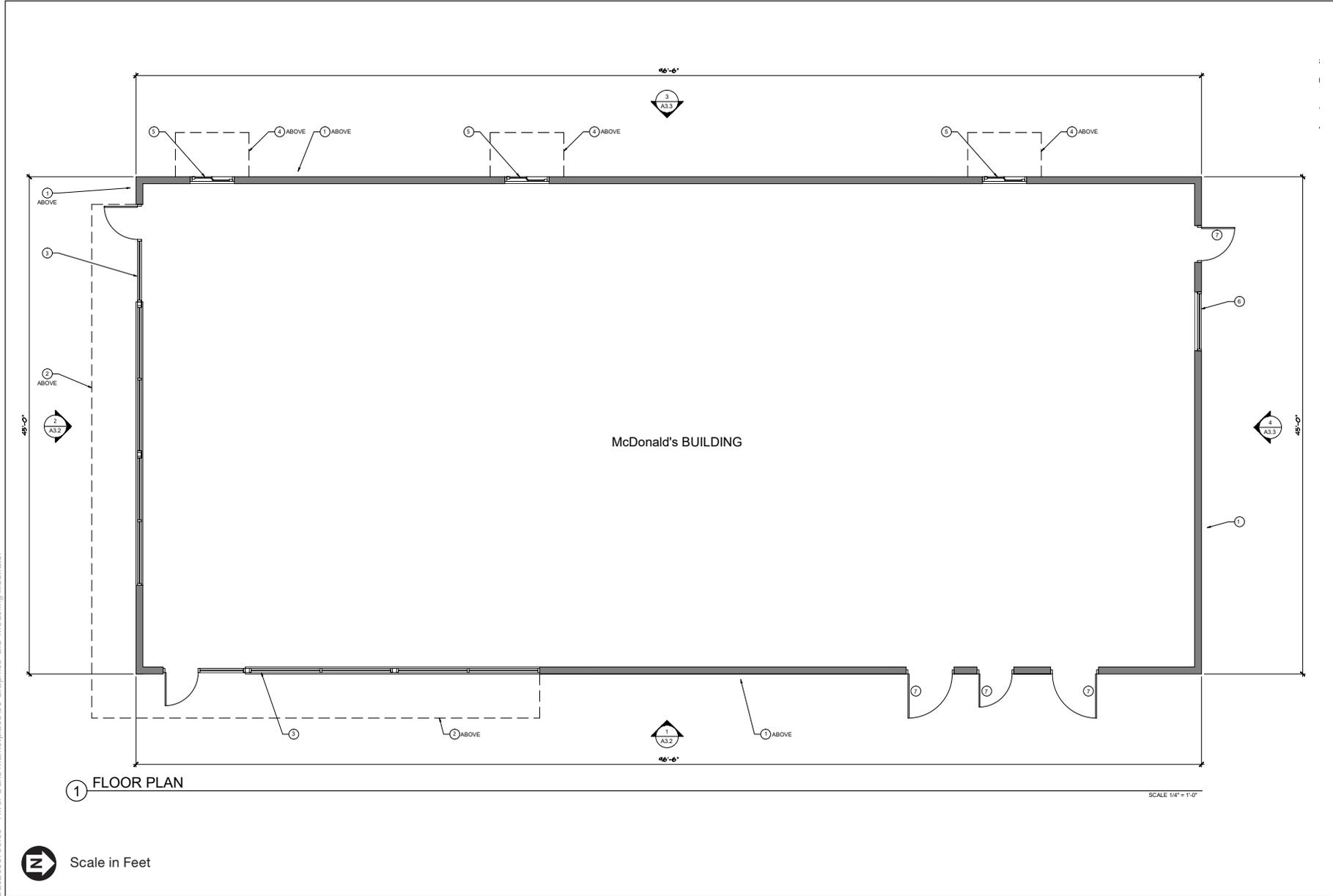
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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 8b**  
7-Eleven Elevations





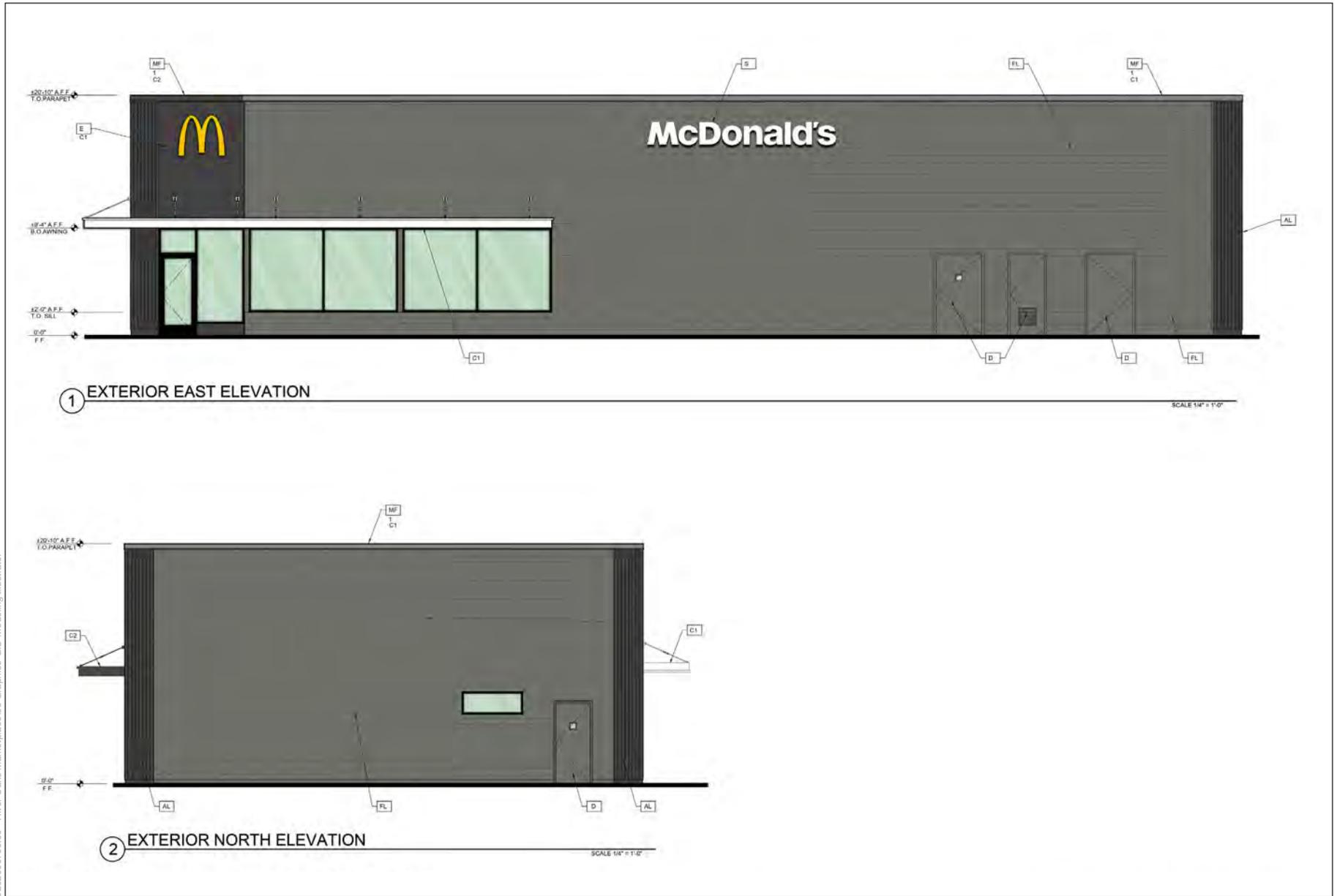
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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 9**  
McDonalds Site Plan Detail





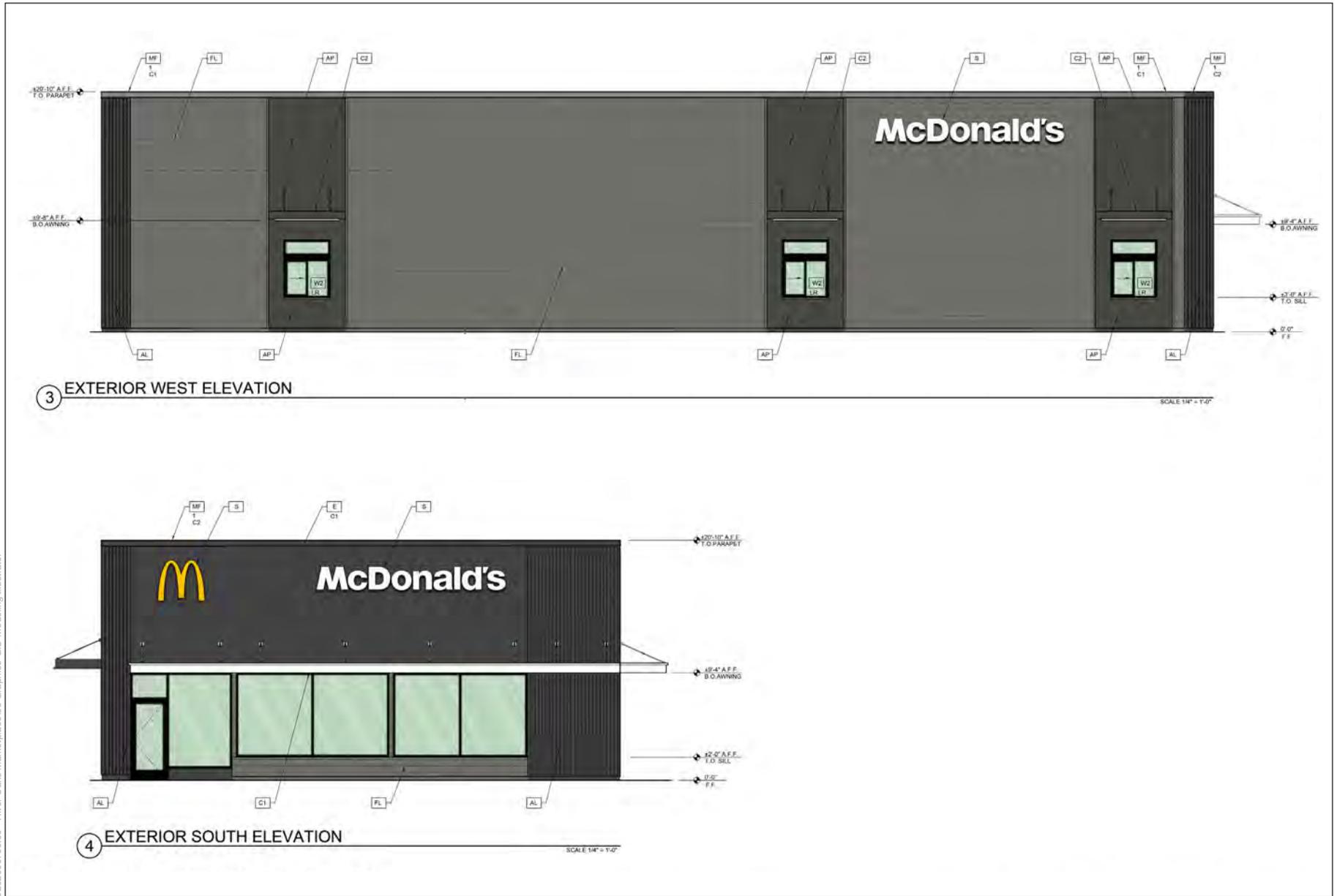
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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 10a**  
McDonalds Elevations





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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 10b**  
McDonalds Elevations







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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 12**  
Dutch Bros. Elevations



Pedestrian access to the project would include on-site walkways between buildings and outdoor seating areas. The onsite detention areas have been designed to incorporate a key pedestrian connection path to the northeast corner of Orchard Lane and Orchard Court.

## **Landscaping**

The proposed landscaping design incorporates a variety of trees, shrubs, and other plantings that enhance the development's building appearance, define site hardscape, and screen undesirable views (see **Figure 13**). As shown in Figure 13, the proposed project would provide shaded areas throughout the site and would provide for shading of more than fifty percent of paved areas. In addition, the project would include landscaped open space areas throughout the project site, as is identified in **Figure 14**. The project site would require grading and the importation of approximately 19,070 cubic yards of fill, to balance the project site. The balance of needed fill will be provided by the adjacent Core Natomas project, which is presently under construction to the north of the project site.

## **Utilities**

### ***Drainage***

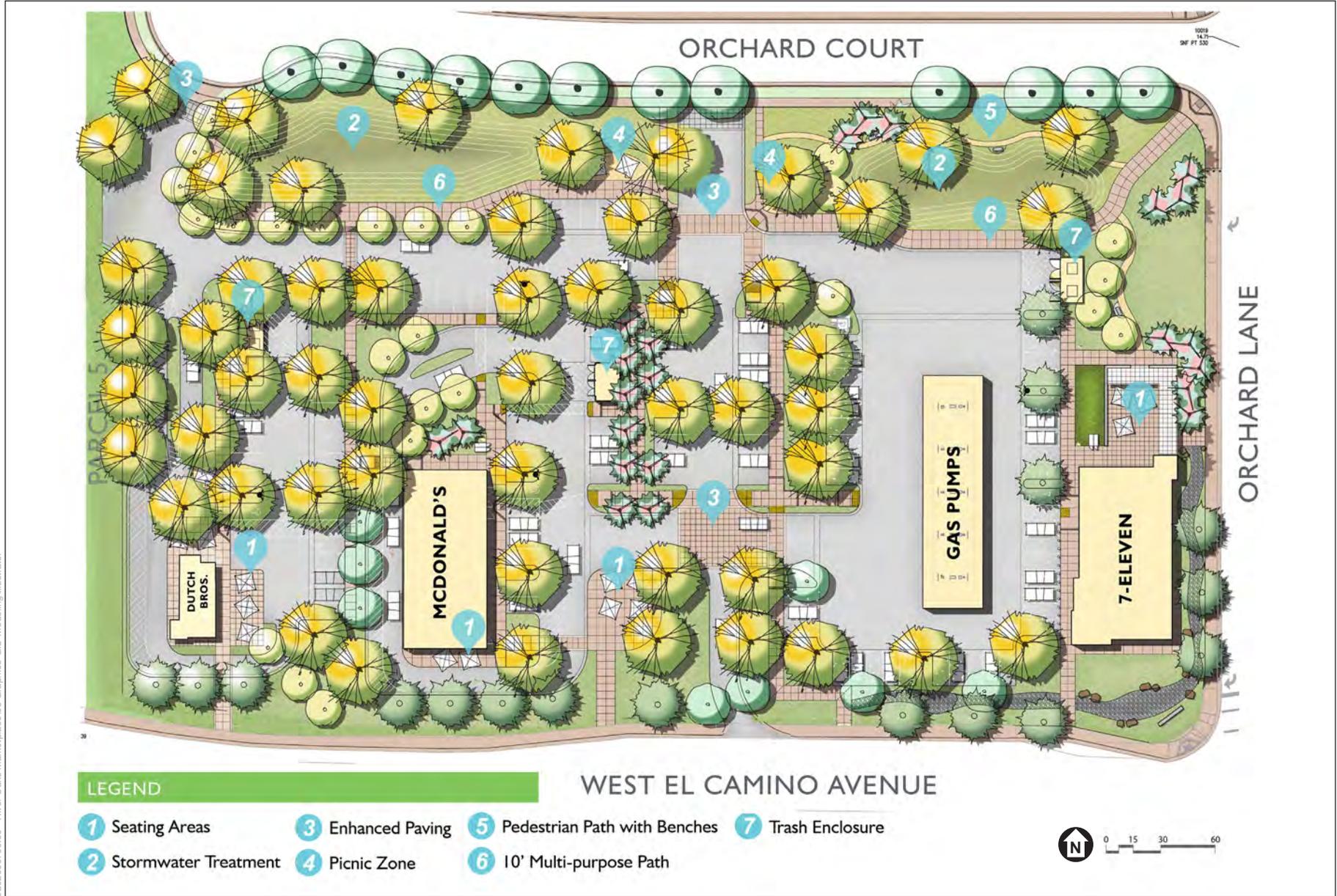
The proposed project would add approximately 2.96 acres of impervious area to the project site, which would be managed on-site through an internal drainage system that would include storm drains interspersed throughout the project site and two stormwater quality/detention basins, located on the north side of the project site. The proposed stormwater basins would have a joint capacity of approximately 0.51 acre-feet, which would be adequate to accommodate stormwater flows from the project site and anticipated runoff generated by buildout of the adjacent parcel to the west of the project site. Each of the proposed detention basins would drain to an existing 36-inch storm drain main within Orchard Court, which has been constructed to serve the project site and the Core Natomas residential development to the north of the project site. A project specific drainage study, meeting the criteria specified in the current Design and Procedures Manual, will be submitted by the project applicant to the Department of Utilities for review and approval, concurrent with the first submittal of the off-site improvement plans.

### ***Energy***

Electrical and natural gas utilities would be connected to existing service lines within Orchard Avenue or Orchard Court, which have been extended to provide service to the adjacent residential developments to the north and east of the project site.

### ***Solid Waste***

Each of the proposed uses would have its own stand-alone solid waste collection facilities, located in parking areas near each use. Solid waste facilities would be covered and secured from use by the public.



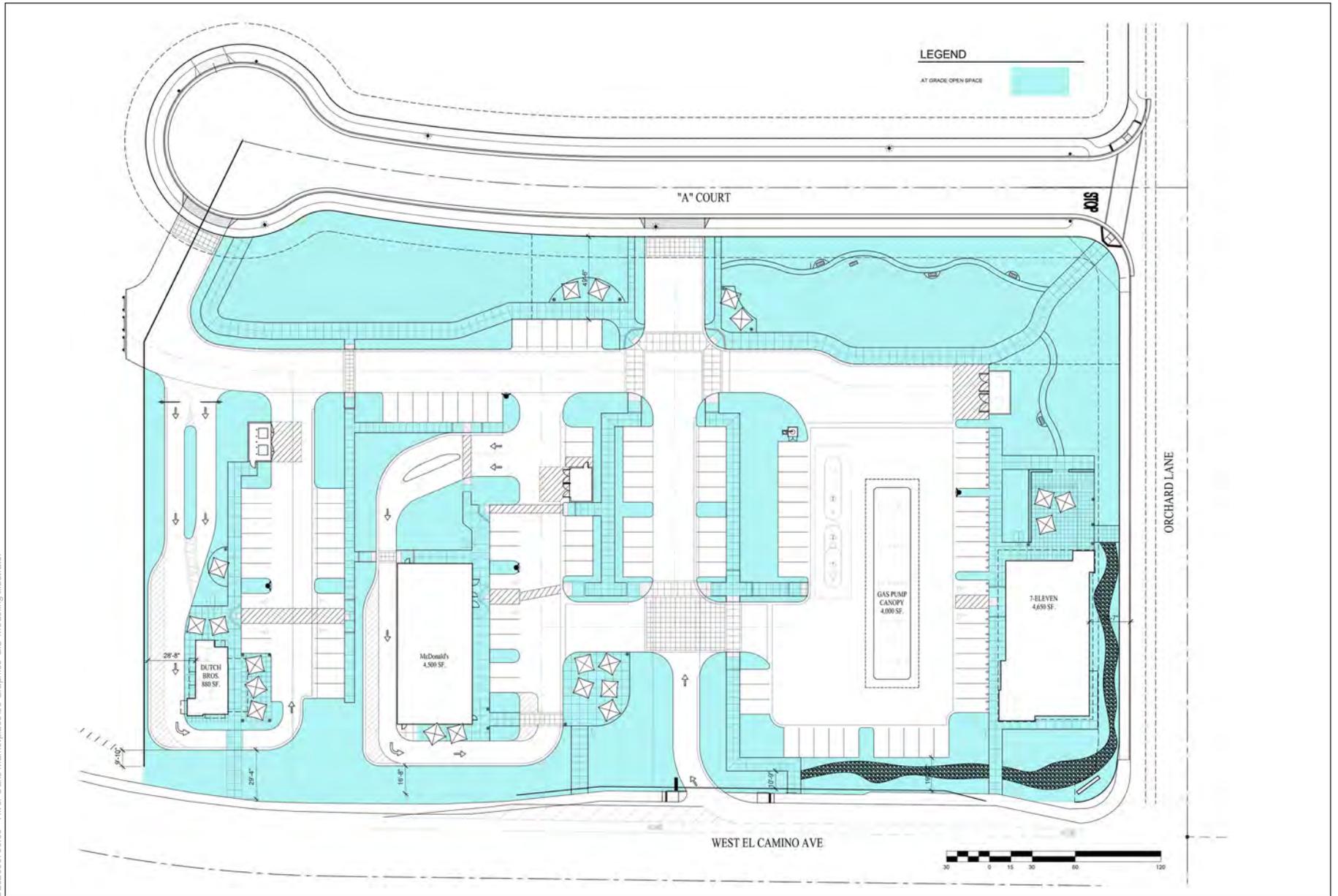
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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 13**  
Landscape Plan





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SOURCE: FM Group Inc., 2020

River Oaks Marketplace

**Figure 14**  
Open Space Plan



### **Wastewater**

Each of the proposed structures would connect a network of sanitary sewer lines internal to the project site, which would be connected to an existing 8-inch sanitary sewer line, located within Orchard Court. The project sewer infrastructure would connect to the existing line within Orchard Court at the Driveway 1 intersection.

### **Water Supply**

The proposed project would include internal infrastructure for water supply and fire suppression water supply, that would both connect to an existing 8-inch water supply main within Orchard Court. Internal water supply and fire suppression supply would connect to each of the proposed uses and would include fire hydrants within parking areas adjacent to each structure. A project specific water study will be prepared by the project applicant and submitted to the Department of Utilities for review and approval. The water study will determine if the existing and proposed water distribution system is adequate to supply the project's domestic and fire flow demands.

## **Project Construction**

### **Construction Duration**

Project construction would be anticipated to last approximately 16 months, beginning in April of 2021 and concluding in July of 2022. Construction would proceed in a single phase.

### **Construction Plan**

Project construction would include three construction periods:

- Period 1 would be site work construction, which would include grading, underground utility construction, and construction of curb, gutter, roadway light poles, and road pavement for the common area roadway. Period 1 would involve approximately seven months of activity.
- Period 2 would include construction of all improvements within each parcel. This period would include construction of foundations, underground utilities stubbed from Period 1, curb and gutter, building construction, pavement installation, sign installation, and parcel site lighting. Construction Period 2 would be anticipated to last approximately five months.
- Period 3 would include landscaping and FFE installation within all buildings. Period 3 would be anticipated to last from April 15, 2022 to June 1, 2022. June 1, 2022 to July 30, 2022 would include punch list and contingency work, leading to project completion.

### **Construction Equipment**

Construction equipment anticipated to be used during project construction would include backhoe loaders/excavators, motor graders, road rollers, cranes, dump trucks, cement trucks, and paving equipment. All diesel off-road construction equipment would have

engines that meet the Tier 4 Final off-road emission standards, as certified by the California Air Resources Board (CARB).

## Construction Personnel

Project construction would utilize different teams for the construction of each of the proposed uses included in the proposed project. **Table 2**, below, identifies average daily construction personnel to be utilized during project construction.

**TABLE 2  
PROPOSED CONSTRUCTION PERSONNEL**

Construction Period	Activity	Average Daily Construction, Testing Personnel and Inspectors
Period 1	<b>Site Grading and Construction of Utilities and Roads</b>	
	Full Project Site	15 to 20
Period 2	<b>Parcel and Building Construction for all three parcels at the same time.</b>	
	7-Eleven Parcel and Building Construction	15
	McDonalds Parcel and Building Construction	15
	Dutch Bros Parcel and Building Construction	6 to 10

As shown in Table 2, Period 1 of project construction would be anticipated to utilize 15 to 20 construction, testing, and inspection personnel. Construction Period 2 would include construction teams for each of the proposed uses for a total of up to 40 construction-, testing-, and inspection-personnel. Construction Period 3 would be anticipated to only utilize a small number of personnel, relative to prior construction periods.

## Project Operation

The proposed project would operate 24 hours per day, and would have a different staffing schedule for each proposed use.

The 7-Eleven Convenience Market would have between 10 and 14 employees, with an approximate staff of between 4 and 8 employees working at a given time. Daily vendor deliveries would be spread throughout the day based on each vendor's specific delivery schedule. Typically, 2 to 3 fuel deliveries would take place each week in mid-morning and mid-afternoon during off-peak time periods.

The proposed McDonalds would be anticipated to operate with a staff of 10-12 employees during a given shift, employing a number of individuals across multiple shifts. Daily vendor deliveries would be spread throughout the day based on each vendor's specific delivery schedule. Typically, one to two deliveries would take place every day during mid-morning, mid-afternoon, or after dark during off-peak time periods.

The Dutch Bros. Coffee Shop would be anticipated to maintain an operating staff of between 4 and 6 employees during a given shift, employing additional personnel to accommodate operations across a 24-hour period each day. Daily vendor deliveries would be spread throughout the day based on each vendor's specific delivery schedule. Typically, one to two deliveries would take place every other day during mid-morning, mid-afternoon, or after dark, during off peak time periods.

## **Required Approvals and Entitlements**

The proposed project would be subject to the following approvals by the City of Sacramento:

- Site Plan and Design Review for a 4.45 net / 5.23 gross acre commercial project
- Tentative Parcel Map to create four (4) parcels
- Amendment to the Park El Camino Planned Unit Development Schematic Plan to include development standards related to three (3) commercial/retail/restaurant uses
- Conditional Use Permit to allow a drive-thru in conjunction with a Dutch Bros. coffee shop
- Conditional Use Permit to allow a drive-thru McDonalds restaurant
- Conditional Use Permit to allow for the Multiple Product Dispenser (MPD) service station
- Conditional Use Permit to allow tobacco sales

The proposed project would be subject to the following approvals by agencies other than the City of Sacramento:

- Sacramento Municipal Air Quality Management Utility District (SMAQMD) approval of a Permit to Construct and Operate a fuel station.

## **Discussion**

### **The Addendum Process**

The Downtown Ford project was approved, and at the time the City adopted a mitigated negative declaration (MND). That process included approval of a mitigation monitoring plan (MMP) to ensure that the mitigation measures were implemented.

The California Environmental Quality Act (CEQA) encourages lead agencies, such as the City here, to avoid duplication and waste of resources in evaluating projects. That includes utilizing prior CEQA review when appropriate. In this case, the City may prepare an Addendum that relies on the Downtown Ford MND if only minor technical changes in the original MND are needed, and if none of the circumstances identified in CEQA Guidelines section 15162 are present.

The discussion below describes the process the City has followed in relying on the Downtown Ford MND.

The City must first determine whether, in light of the proposed changes to the project, the environmental analysis in the original MND remains relevant because it retains some informational value. The proposed changes to the prior project will remain within the same original parcel configuration and will retain many of the original project features, rendering the previously adopted MND highly relevant to the environmental analysis of the changes to the project now proposed.

The City's next step is to review the circumstances identified in section 15162. If any of those circumstances exist, the preparation of a supplemental MND or EIR might be required. Those circumstances are:

1. Substantial changes in the project, or circumstances under which the project is undertaken;
2. When such changes lead to new significant effects or an increase in the severity of significant effects identified in the original CEQA document;
3. New information is available that demonstrates the project would have significant effects that were not identified in the original CEQA document, or that those effects that were identified will be more severe; or
4. The new information shows that mitigation measures thought to be infeasible are now feasible, or new mitigation measures are identified, and the applicant refuses to implement such measures.

In this case, the Downtown Ford project included no identification of mitigation measures that were infeasible—all mitigation measures that had been identified were implemented, and the applicant has not refused to implement any of the mitigation measures that would be implemented as part of the current project. The City will include a finding with regard to circumstance (4), above, in the project hearing documents, but will not discuss it further in this Addendum. The discussion below focuses on whether either project changes, changed circumstances, or new information would support a finding that a new significant effect, or an increase in the severity of a previously identified impact, is present.

## I. Land Use and Planning

### **Project Site**

The 5.23-acre project site is located in the South Natomas Community Plan (SNCP) area, within the Park El Camino Planned Unit Development (PUD). At the time of the preparation of the Downtown Ford IS/MND, the project site was vacant and mass-graded. Land uses surrounding the project site included nearby commercial and residential development south of West El Camino Ave; vacant lots to the north, east and south of the project site; and I-80 to the west and north of the project site. The vacant areas to the

north of the River Oaks Marketplace project site were part of the larger Downtown Ford Dealership project site.

The project site has remained undeveloped. The adjacent land planned for the automobile dealership is under construction as the Core Natomas multifamily residential project; a new single-family residential development is under construction to the east of Orchard Lane; and an AM/PM convenience store and Arco gas station have been constructed and are in operation to the south along West El Camino Avenue.

Existing adjacent land uses include I-80, and vacant land designated for Commercial and Residential uses.

## **Land Use and Zoning Designations**

At the time of the preparation of the Downtown Ford IS/MND, the Sacramento 2030 General Plan designation for the entire Downtown Ford Dealership project site was the same as is currently designated for the project site, with the Suburban Center uses in the 2035 General Plan currently designated for the project site, and zoning for C-2-PUD General Commercial PUD for the project site within the South Natomas Community Plan area, as part of the Park El Camino PUD. In 2015, the City adopted the Sacramento 2035 General Plan and certified the Sacramento 2035 General Plan Master EIR, which maintained the Suburban Center land use designation for the proposed project site. Under the project analyzed in the Downtown Ford IS/MND, all zoning and land use designations for the project site would remain the same.

### ***Existing General Plan Land Use Designation***

The Sacramento 2035 General Plan land use designation for the project site is Suburban Center. The general plan indicates that this designation provides for compact and consistent development intended to transform existing auto-dominated suburban centers into neighborhood destinations by integrating residential, office, service, and community supportive facilities and services with retail uses and by adding public plazas and pedestrian amenities that will create people-oriented centers for living, working, and gathering. City planning staff have concluded that the proposed development is consistent with the general plan land use designation.<sup>1</sup>

Development standards within Suburban Center are:

- Minimum Density: 15.0 Units/ Net Acre
- Maximum Density: 36.0 Units/ Net Acre
- Minimum FAR: 0.15 FAR
- Maximum FAR: 2.00 FAR

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<sup>1</sup> Haenggi, 2020. Personal communication with Teresa Haenggi. October 2020.

## **Existing Zoning**

The zoning designation for the project site is General Commercial PUD (CP-2-PUD).

### *General Commercial Zone*

The purpose of the C-2 zone is to provide for the sale of commodities, or performance of services, including repair facilities, offices, small wholesale stores or distributors, and limited processing and packaging. Good examples are a small neighborhood hardware store or a corner market.

### *Planned Unit Development*

The purpose of Planned Unit Development is to provide for greater flexibility in the design of integrated developments than otherwise possible through strict application of zoning regulations. It is the intent of Planned Unit Development to encourage the design of well-planned facilities that facilitates mixed uses designed to assure that new development is healthy and of long-lasting benefit to the community and the City.

## **Land Use Evaluation**

The proposed project would subdivide the 5.23-acre project site into four separate parcels and would include the development of three commercial structures. The proposed development would include a 7-Eleven convenience market concept and fueling station, which would be co-located with a Laredo Taco Company Restaurant, McDonalds drive thru restaurant, and Dutch Bros. drive-thru coffee shop.

The proposed project would not deviate from the project definition included in the Downtown Ford IS/MND as the 7.5 acres (which includes the proposed project site) described in the Downtown Ford IS/MND was to be developed with a mix of office and retail uses, including development for 19,500 sf of retail use, and 4,000 sf of restaurant and gas station use. Similar to the uses described in the Downtown Ford IS/MND, the proposed project involves the construction of commercial structures in an area that is primarily a mix of commercial, residential, and undeveloped land. The proposed project would be consistent with the allowable land uses and development intensities identified the 2035 General Plan land use designations and current zoning designation for the project site.

The proposed project would be compatible with surrounding land uses. The proposed project would develop commercial and related uses in an area that includes a mix of commercial, residential, and undeveloped land. Consequently, as with the project analyzed in the Downtown Ford IS/MND, the proposed project would not introduce uses that would be incompatible with or disruptive to surrounding land uses.

The project site has not been used for agricultural activities for some time and does not meet the criteria for being identified as Prime Farmland. The California Department of Conservation Land Resources Protection Division's Farmland Mapping and Monitoring Program (FMMP) indicates that the project site is classified as "Other Land", is not

considered Prime Farmland, and the site has been mass graded. In evaluating development within the General Plan area, the Sacramento 2030 General Plan Master EIR and the subsequently adopted Sacramento 2035 General Plan Master EIR found that remaining agricultural areas within the General Plan boundaries are not considered viable or suitable for large scale agricultural operations. As with the project analyzed in the Downtown Ford IS/MND, the proposed project would not result in impacts to farmland or important agricultural resources.

The project is consistent with the underlying general plan and Community Plan land use designations, zoning, and PUD land use designations. Impacts to land use from the proposed project related to any substantial alteration of present or planned land use would not require the preparation of a subsequent IS/MND.

## II. Population, Employment and Housing

The City determined in the Downtown Ford IS/MND that, at full buildout, development at the proposed project site would involve the construction of a maximum of 42,000 sf of office, 19,500 sf of retail uses, and 4,000 sf of restaurant and gas station uses, including the development of associated infrastructure. The IS/MND determined that because the project would not involve residential development or the extension of roads or other infrastructure, there would not be any oversized project infrastructure needed to accommodate previously unserved growth, and the project would not be growth-inducing. This conclusion remains unchanged for this project.

The IS/MND determined that the project site and surrounding areas have been designated for urban development in previous planning documents, and any impacts from the infrastructure related to project development had already been evaluated within the 2030 General Plan Master EIR (and subsequently in the 2035 General Plan Master EIR). From the previously analyzed project, it was determined that no population increases would result from the proposed project because no residential uses were proposed and employment was likely to be satisfied by current residents. The project would not displace existing residents or housing.

The proposed project would not deviate from the project definition included in the Downtown Ford IS/MND. The land area that includes the current project site described in the Downtown Ford IS/MND were to be developed with a mix of office and retail uses. Similar to the uses described in the Downtown Ford IS/MND, the proposed project involves the construction of commercial structures in an area that is primarily a mix of commercial, residential, and undeveloped land. The proposed project would be consistent with the allowable land uses and development intensities identified the 2035 General Plan land use designations and zoning for the project site.

The proposed changes would not add population or affect housing and would not alter the anticipated effects on population and housing associated with the project described in the Downtown Ford IS/MND. No additional impacts to population and housing would

occur. For these reasons, impacts to population and housing from the proposed project would not require the preparation of an EIR or subsequent IS/MND.

### III. Aesthetics, Light, and Glare

The Aesthetics section of the Downtown Ford IS/MND described existing visual and aesthetic resources for the project site and the region and evaluated potential impacts of the project with respect to urbanization of the project area.

The IS/MND confirmed that the project site was a mass-graded and vacant site located in a developed area of Sacramento, and that existing development and areas proposed for new development within the South Natomas Community Plan area surrounded the project site. The IS/MND noted that open agriculture land, the Sacramento River, the Natomas West Main Drainage and associated riparian trees and vegetation, and the I-5 and 1-80 freeways were other prominent features in the vicinity of the project site. The IS/MND described the visual character of the project area as a suburban-style environment with a mix of single-story commercial centers and single- and two-story residential development.

The IS/MND description of the project site and surrounding environment and visual character remains largely the same today, though urban development adjacent to the site has intensified since adoption of the IS/MND with the development of the Core Natomas multi-family project to the north (currently under construction), a new single-family residential development under construction to the east of Orchard Lane, and an AM/PM convenience store and Arco gas station to the south along West El Camino Avenue.

### Scenic Resources

The Downtown Ford IS/MND confirmed that the project site was a mass-graded and vacant site with no trees, buildings, or rock outcroppings and was not located within the vicinity of a state scenic highway or designated scenic vista. The IS/MND determined that the project would not have adverse impacts on scenic vistas or scenic resources and the impact would be less-than-significant. This determination remains the same for the proposed project. There have been no changes (e.g., designations of scenic highways, adoptions of scenic vistas or resources) on the project site or vicinity or new information that would result in the project having a significant impact on a scenic resource. The proposed project would not have more significant effects related to scenic resources that were not discussed in the Downtown Ford IS/MND or increase the severity of impacts

### Visual Character

The analysis of potential impacts to visual character in the Downtown Ford IS/MND determined that development of a flat, graded site with an automobile dealership and other commercial uses compatible with surrounding urban development would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The IS/MND concluded that the Downtown Ford project was consistent with development anticipated to occur in the area as set forth in the 2035

General Plan and in the South Natomas Community Plan. The IS/MND stated that the project design would be reviewed as part of the Special Permit process for the project, ensuring that the design of the project would be visually compatible with the site and its surroundings. For these reasons, the IS/MND determined that impacts related to degradation of visual character would be less than significant.

The proposed project would subdivide the 5.23-acre project site into four separate parcels and would include the development of three commercial structures, including a 7-Eleven convenience market concept and fueling station, which would be co-located with a Laredo Taco Company Restaurant, McDonalds drive-through restaurant, and a Dutch Bros. drive-through coffee shop. Since the time of the adoption of the original MND, the updated Planning and Development Code requires the site plan and design process that reviews project design.

The structures would each be single-story buildings. Building facades would include painted exterior plaster and metal and stone veneer with standing seam metal roofs. Accessory elements such as trash enclosures, outdoor seating areas, and monument signage would have a similar or complimentary appearance to the design palette of the proposed buildings.

The project site would be laid out with proposed facilities located near the south side of the project site and primary vehicle circulation driveways, drainage facilities, and landscaped areas located toward the north. Parking spaces and pedestrian pathways would be interspersed throughout the project site.

The proposed landscaping design incorporates a variety of trees, shrubs, and other plantings that enhance the subject development's building appearance, define site hardscape, and screen undesirable views.

The proposed project would develop urban uses in an area designated in the City's 2035 General Plan for urban uses. As with the project analyzed in the Downtown Ford IS/MND, the proposed project would be subject to Site Plan and Design Review pursuant to Chapter 17.808 of the City Code. The intent of this process is to (1) ensure that the development is consistent with applicable plans and design guidelines; (2) is high quality and compatible with surrounding development; (3) is supported by adequate circulation, utility, and related infrastructure; (4) is water and energy efficient; and (5) avoids environmental effects to the extent feasible. The aspects of design considered in the site plan and design review process include architectural design, site design, adequacy of streets and accessways for all modes of travel, energy consumption, protection of environmentally sensitive features, safety, noise, and other relevant considerations.

As with the project analyzed in the Downtown Ford IS/MND, compliance with the City's Site Plan and Design Review process would ensure that the proposed project is consistent with applicable plans and design guidelines, is of high quality, and is compatible with surrounding development, thus avoiding adverse impacts to visual character within the context of an urban setting. Consequently, the proposed project

would not have more significant effects related to visual character that were not discussed in the Downtown Ford IS/MND or increase the severity of impacts.

## Light and Glare

In the analysis of light and glare impacts, the Downtown Ford IS/MND indicated that the project would introduce new sources of light and glare into the project area in the form of lighting and signage for the proposed auto dealership. The IS/MND noted that lighting for the proposed project would include approximately 50 pole-mounted lights of an approximate 20-foot height distributed throughout the project site, as well as an approximately 130-sf internally illuminated Ford sign mounted on a 20-foot pole. Typically, auto dealerships are well-illuminated and are clearly visible from the surrounding area. As described in the Downtown Ford IS/MND, the southeast portion of that project site would have retail buildings and associated parking areas. This is the same type of use and development pattern that is anticipated in this location for the River Oaks Marketplace project.

The Sacramento 2035 General Plan includes Policy ER 7.1.3, which requires projects to minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary, and requiring light for development to be directed downward to minimize spill-over onto adjacent properties and reduce vertical glare. In addition, Policy ER 7.1.4, prohibits new development from (1) using reflective glass that exceeds 50 percent of any building surface and on the bottom three floors, (2) using mirrored glass, (3) using black glass that exceeds 25 percent of any surface of a building, (4) using metal building materials that exceed 50 percent of any street-facing surface of a primarily residential building, and (5) using exposed concrete that exceeds 50 percent of any building.

The proposed project would include a variety of lighting and signage, including building perimeter lighting, emergency lighting, outdoor security lighting, landscape lighting, and interior lighting that would be visible from outside of buildings. The proposed project would be required to comply with City policies and design standards set forth to minimize impacts related to light and glare. The lighting for the proposed project would be less intense than an auto dealership, would be subject to design requirements to avoid glare, and would not result in any new significant effects.

The proposed project is subject to the City's Site Plan and Design Review process, which would ensure that the proposed project is consistent with applicable plans and design guidelines, including standards related to light and glare, and is compatible with surrounding development, thus avoiding adverse impacts related to light and glare. Consequently, the proposed project would not have more significant effects related to light and glare that were not discussed in the Downtown Ford IS/MND or increase the severity of impacts that were discussed.

## Summary

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the IS/MND result in new significant impacts relating to aesthetics, light, and glare, or significant impacts that are substantially more severe than impacts previously disclosed. For these reasons, impacts related to aesthetics, light, and glare from the proposed project would not require the preparation of a subsequent IS/MND.

## IV. Agricultural and Forestry Resources

Agriculture and forestry resources were not analyzed in the Downtown Ford Auto Dealership Project IS/MND.

The project site is currently vacant and undeveloped. The project site does not contain soils designated as Important Farmland (i.e., Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance).<sup>2</sup> The site is not zoned for agricultural uses, and there are no Williamson Act contracts that affect the project site. No existing agricultural or timber-harvest uses are located on or in the vicinity of the project site. Existing agricultural uses within the City of Sacramento would be unaffected by development of the project site. Additionally, development of the project site was anticipated in the 2035 General Plan, which concluded that development impacts assumed under the 2035 General Plan on agricultural and forestry resources within the City would be less than significant.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND. For these reasons, impacts related to agriculture and forestry resources from the proposed project would not require the preparation of a subsequent IS/MND or EIR.

## V. Air Quality

The Air Quality section of the Downtown Ford IS/MND analyzed the short-term effects (construction) and long-term effects (operations) of the project. The short term emissions were estimated for the construction of the 11.75-acre auto dealership phase of the project due to the uncertainty in the development of the remaining 7.5 acres of the project site at the time the Downtown Ford IS/MND was prepared. The Downtown Ford IS/MND concluded that the short-term and the long-term effects from the project would not violate

<sup>2</sup> California Department of Conservation, 2016. California Important Farmland Finder. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed September 25, 2020.

any air quality standard or contribute to an air quality violation, and therefore would be less than significant. It was determined that short-term and long-term impacts from the project would be less than significant for both objectionable odors and pollutant exposure at sensitive receptors.

Since the publication of the Downtown Ford IS/MND, the SMAQMD has revised the recommended air quality model and thresholds of significance. The recommended model is the newest version of the California Emissions Estimator Model (CalEEMod). At the time of publication of the Downtown Ford IS/MND, the SMAQMD used emissions significance thresholds of 85 pounds per day (ppd) of nitrogen oxides (NO<sub>x</sub>) for construction and 65 ppd of reactive organic gases (ROG) plus 65 ppd of NO<sub>x</sub> for operations. The current SMAQMD thresholds of significance limit operational ROG emissions and NO<sub>x</sub> emissions to 65 ppd. There is no threshold for construction ROG emissions; and the threshold for construction NO<sub>x</sub> emissions remains the same at 85 ppd.

In addition, air quality construction and operational-significance thresholds now include PM<sub>10</sub> and PM<sub>2.5</sub>, and according to the SMAQMD CEQA guidance, project-related construction and operational emissions that exceed zero pounds per day of PM<sub>10</sub> and PM<sub>2.5</sub> would result in a significant impact, unless all feasible Basic Construction Emission Control Practices (Best Management Practices [BMPs]) are implemented. After implementation of all feasible SMAQMD BMPs, the SMAQMD's significance threshold for PM<sub>10</sub> and PM<sub>2.5</sub> increases to 80 ppd (14.6 tons per year) of PM<sub>10</sub> and 82 ppd (15 tons per year) of PM<sub>2.5</sub>. Since the proposed project would implement all feasible SMAQMD BMPs during construction and operation, SMAQMD's 80-pounds-per-day (14.6 tons per year) of PM<sub>10</sub> and 82-pounds-per-day (15 tons per year) of PM<sub>2.5</sub> significance thresholds would apply. **Table 3** presents the current SMAQMD thresholds.

**TABLE 3**  
**SMAQMD CRITERIA AIR POLLUTANT THRESHOLDS OF SIGNIFICANCE**

Pollutant	Construction Phase	Operational Phase
Oxides of nitrogen (NO <sub>x</sub> )	85 lb/day	65 lb/day
ROG (VOC)	None	65 lb/day
PM <sub>10</sub>	0 *	0 *
PM <sub>2.5</sub>	0 *	0 *

NOTE:

\* If all feasible Best Achievable Control Technology/Best Management Practices are applied, then the threshold of significance is 80 lbs/day and 14.6 tons/year for PM<sub>10</sub>, and 82 lbs/day and 15 tons/year for PM<sub>2.5</sub> for both construction and operational phases. Consequently, these thresholds are used to evaluate operational emissions.

SOURCE: SMAQMD, 2020.<sup>3</sup>

<sup>3</sup> SMAQMD, 2020. Guide to Air Quality Assessment in Sacramento County. April 2020. Available: <http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools>.

As part of the revised SMAQMD CEQA guidance, other pollutants such as CO, sulfur dioxide (SO<sub>2</sub>) and lead are of less concern for the region because operational activities are not likely to generate substantial quantities of these criteria air pollutants and the Sacramento Valley Air Basin has been in attainment for these criteria air pollutants for multiple years.<sup>4</sup> Consequently, quantification of CO concentrations near roadways is no longer part of their analysis expectations.

In 2015, the City of Sacramento adopted the Sacramento 2035 General Plan. The following goals and policies from the 2035 General Plan are relevant to air quality.

**Goal ER 6.1: Improved Air Quality.** Improve the health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions that affect climate change.

**Policy ER 6.1.1: Maintain Ambient Air Quality Standards.** The City shall work with the California Air Resources Board and the Sacramento Metropolitan Air Quality Management District (SMAQMD) to meet State and Federal ambient air quality standards in order to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution.

**Policy ER 6.1.2: New Development.** The City shall review proposed development projects to ensure projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) through project design.

**Policy ER 6.1.3: Emissions Reduction.** The City shall require development projects that exceed SMAQMD ROG and NO<sub>x</sub> operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project.

**Policy ER 6.1.4: Sensitive Uses.** The City shall coordinate with SMAQMD in evaluating exposure of sensitive receptors to toxic air contaminants, and will impose appropriate conditions on projects to protect public health and safety.

**Policy ER 6.1.10: Coordination with SMAQMD.** The City shall coordinate with SMAQMD to ensure projects incorporate feasible mitigation measures if not already provided for through project design.

## Short-Term Emissions

Construction emissions evaluated in the Downtown Ford IS/MND are not applicable to the proposed project because of its omission of the construction activity in the southern parcels, i.e. where the proposed project is contained. The construction in the dealership approved in the Downtown Ford IS/MND never commenced and its project site has since

<sup>4</sup> SMAQMD, 2019. Guide to Air Quality Assessment in Sacramento County - Chapter 4 Operational. July 2019. Available: <http://www.airquality.org/LandUseTransportation/Documents/Ch4OperationalFinal7-2019.pdf>.

been replaced with a separate project approved under The Core Natomas IS/MND. Therefore, the criteria pollutant emissions as a result of the proposed project are evaluated as a new project. Construction emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were modeled using CalEEMod 2016.3.2. The model assumed the proposed project would be constructed over the course of 14 months, with construction beginning in April 2021. Construction activities were assumed to not require import or export of fill material. CalEEMod defaults for construction phasing and construction-worker trip generation rates were used unless otherwise provided by the project applicant. The results of the modeling are shown in **Table 4**. Modeling assumptions and results can be found in **Attachment 1**.

As shown in Table 4, construction of the proposed project would generate daily and annual PM<sub>2.5</sub> and PM<sub>10</sub> emissions that would exceed the SMAQMD thresholds of significance. The proposed project would be subject to the regulations discussed in the Downtown Ford IS/MND to control fugitive dust emissions including measures described Sacramento City Code regulations such as watering all construction sites, covering stockpiles and haul trucks, sweeping dirt from paved surfaces, and suspending earthmoving activities on very windy days. Additionally, the project would be required to implement all feasible SMAQMD BMPs to control fugitive dust and exhaust emissions from diesel powered fleets during construction of the proposed project.

**TABLE 4**  
**ESTIMATED UNMITIGATED CONSTRUCTION EMISSIONS**

	NO <sub>x</sub> , ppd	PM <sub>10</sub> , ppd	PM <sub>10</sub> , tpy	PM <sub>2.5</sub> , ppd	PM <sub>2.5</sub> , tpy
2021 Emissions	40.60	20.42	0.71	11.89	0.43
2022 Emissions	20.34	1.83	0.06	1.10	0.04
Maximum for Proposed Project	40.60	20.42	0.71	11.89	0.43
SMAQMD Significance Thresholds	85	0	0	0	0
Proposed Project Exceeds SMAQMD Significance thresholds?	No	Yes	Yes	Yes	Yes

NOTES:

ppd = Pounds per day

tpy = Tons per year

NA = not applicable

- 1 Construction emissions for winter and annual emissions were made using CalEEMod 2016.3.2. See Attachment 1 for details. Unmitigated emissions do not include any mitigation measures identified in the Downtown Ford IS/MND.
- 2 SMAQMD has established a zero emissions threshold for PM<sub>10</sub> and PM<sub>2.5</sub> when projects do not implement their Best Available Control Technologies/Best Management Practices (BACT/BMPs). If all feasible BACT/BMPs are applied, then significance threshold for PM<sub>10</sub> is increased to 80 pounds per day/14.6 tons per year and PM<sub>2.5</sub> is increased to 82 pounds per day/15 tons per year.

SOURCE: ESA, 2020.

SMAQMD considers the following Basic Construction Emissions Control Practices feasible for controlling fugitive dust from a construction site:

- a) Control of fugitive dust is required by District Rule 403 and enforced by District staff.
- b) 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.
- c) 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.
- d) 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.
- e) Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- f) 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 are SMAQMD Exhaust Control Practices from diesel powered fleets working at construction sites:

- a) Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 2 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.
- b) 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].
- c) Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

The measures described above capture SMAQMD's Basic Construction Emissions Control Practices as would be required of the project applicant. **Table 5** shows construction emissions with implementation of feasible measures to control fugitive dust. As shown in Table 5, with implementation of all feasible measures to control fugitive dust emissions as well as exhaust emissions from heavy-duty construction equipment, construction-related emissions would be reduced to a less than significant level for NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> pollutants.

**TABLE 5  
ESTIMATED MITIGATED CONSTRUCTION EMISSIONS**

	<b>NO<sub>x</sub>, ppd</b>	<b>PM<sub>10</sub>, ppd</b>	<b>PM<sub>10</sub>, tpy</b>	<b>PM<sub>2.5</sub>, ppd</b>	<b>PM<sub>2.5</sub>, tpy</b>
2021 Emissions	40.60	10.48	0.39	6.43	0.26
2022 Emissions	20.34	1.83	0.06	1.10	0.04
Maximum for Proposed Project	40.60	10.48	0.39	6.43	0.26
SMAQMD Significance Thresholds	85	80	14.6	82	15
Proposed Project Exceeds SMAQMD Significance thresholds?	No	No	No	No	No

## NOTES:

ppd = Pounds per day

tpy = Tons per year

NA = not applicable

- 1 Construction emissions for winter and annual emissions were made using CalEEMod 2016.3.2. See Attachment 1 for details. Unmitigated emissions do not include any mitigation measures identified in the Redevelopment Plan EIR.
- 2 SMAQMD has established a zero emissions threshold for PM<sub>10</sub> and PM<sub>2.5</sub> when projects do not implement their Best Available Control Technologies/Best Management Practices (BACT/BMPs). If all feasible BACT/BMPs are applied, then significance threshold for PM<sub>10</sub> is increased to 80 pounds per day/14.6 tons per year and PM<sub>2.5</sub> is increased to 82 pounds per day/15 tons per year.

SOURCE: ESA, 2020.

The construction of the proposed project could expose nearby sensitive receptors to toxic air contaminants (TAC) during construction. Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known source of TAC emissions. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments should be based on a 30-year exposure period. As mentioned prior, the construction impacts for the parcels corresponding to the proposed project site were not evaluated as part of the Downtown Ford IS/MND. Additionally, since the publication of the Downtown Ford IS/MND, new sensitive receptors, specifically east of Orchard Lane, have been constructed and therefore maybe impacted by the proposed project's construction activity.

For construction-related cancer risk, the TAC analysis only considers DPM because all construction equipment is assumed to be diesel-fueled. All DPM emissions are conservatively assumed to be equal to PM<sub>10</sub> emissions from equipment and vehicle exhaust.

A screening level construction HRA was completed using U.S. EPA's AERSCREEN model (v16216) to calculate the potential diesel particulate matter (DPM) concentration at nearby residents. The nearest residents to the project are directly east of the project site along Orchard Lane. Cancer risk was then calculated at the nearest resident using the estimated DPM concentration from construction emission and risk assessment

procedures and methods from OEHHA guidance.<sup>5</sup> **Table 6** below summarizes the maximum cancer risks and health hazard indexes for project related unmitigated construction activities affecting the residential maximally exposed individual (MEI).

**TABLE 6**  
**ESTIMATED UNMITIGATED CONSTRUCTION HEALTH RISK IMPACTS**

Location	Cancer Risk, per million	Hazard Index, unitless
Nearby Resident	154.2	0.20
SMAQMD Significance Thresholds <sup>1</sup> :	10	1
Proposed Project Exceeds SMAQMD Significance thresholds?	Yes	No

NOTES:

1 SMAQMD does not have established CEQA health risk threshold for construction impacts. Therefore, SMAQMD CEQA thresholds for stationary sources are conservatively applied to determine significance.

SOURCE: ESA, 2020.

Project construction, using regular construction equipment, would result in a cancer risk of 154.2 in one million at the MEI, which exceed SMAQMD's cancer risk significance threshold of 10 in one million.

However, the project proponent has committed to using diesel off-road equipment that have engines that meet the Tier 4 Final off-road emission standards. Tier 4 construction equipment has fewer emissions, thereby reducing health risk to sensitive receptors.

With the use of Tier 4 construction equipment, the computed maximum increased lifetime residential cancer risk from construction would be 6.4 in one million and the Hazard Index would be 0.01, which are below the threshold of significance as shown in **Table 7**. As a result, impacts would be less than significant.

**TABLE 7**  
**ESTIMATED UNMITIGATED CONSTRUCTION HEALTH RISK IMPACTS**

Location	Cancer Risk, per million	Hazard Index, unitless
Nearby Resident	6.4	0.01
SMAQMD Significance Thresholds <sup>1</sup> :	10	1
Proposed Project Exceeds SMAQMD Significance thresholds?	No	No

NOTES:

1 SMAQMD does not have established CEQA health risk threshold for construction impacts. Therefore, SMAQMD CEQA thresholds for stationary sources are conservatively applied to determine significance.

SOURCE: ESA, 2020.

<sup>5</sup> OEHHA, 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Office of Environmental Health Hazard Assessment. February.

## Long-Term Emissions

Unlike for short-term emissions, the Downtown Ford IS/MND analyzed full buildout conditions including the southern portion of the project that contained a gasoline refueling station and commercial use. The emissions associated to the mobile source trip generation for the proposed River Oaks Marketplace Project would be similar to the trip generation analyzed in the Downtown Ford IS/MND. Total weekday daily trips for the Downtown Ford IS/MND were based on modeling defaults, which, when compared to the trip generation for the proposed project, are slightly less for the land use types. The mobile source emissions estimated in the Downtown Ford IS/MND were, however, estimated using emission factors for the project year of 2002. Since approval of the Downtown Ford IS/MND, emissions from vehicles have become cleaner over the years and therefore it is not anticipated for the proposed project to have higher mobile source impacts than were estimated for the project site in the Downtown Ford IS/MND.

To evaluate the significance of operational air quality impacts that may result from the proposed project, operational emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were modeled using CalEEMod 2016.3.2. Mobile source emissions were calculated using trip generation rates for the proposed project. Total daily trips for the proposed 7-Eleven, McDonalds, and Dutch Bros. are 4,253 trips, 2,119 trips, and 1,793 trips, respectively. For office operations, CalEEMod defaults for trip distribution and trip lengths were utilized. CalEEMod defaults for energy use and water use were used to calculate emissions. Estimated operational emissions for the proposed project are summarized in **Table 8**. Modeling assumptions and results can be found in Attachment 1.

**TABLE 8**  
**ESTIMATED OPERATIONAL EMISSIONS**

	NO <sub>x</sub> , ppd	ROG, ppd	PM <sub>10</sub> , ppd	PM <sub>10</sub> , tpy	PM <sub>2.5</sub> , ppd	PM <sub>2.5</sub> , tpy
Area	<0.01	0.32	<0.01	<0.01	<0.01	<0.01
Energy	0.26	0.03	0.02	<0.01	0.02	<0.01
Mobile	32.11	12.68	9.45	1.66	2.62	0.46
Total Operational Emissions	32.37	13.03	9.47	1.67	2.64	0.46
SMAQMD Significance Thresholds	65	65	80	14.6	82	15
Proposed Project Exceeds SMAQMD Significance thresholds?	No	No	No	No	No	No

**NOTES:**

ppd = Pounds per day

tpy = Tons per year

1 Operational emissions for winter and annual emissions were made using CalEEMod 2016.3.2. See Attachment 1 for details.

SOURCE: ESA, 2020.

As shown in Table 8, operations of the proposed project would generate emissions that would not exceed the SMAQMD thresholds of significance for any daily or annual pollutant emissions.

As part of the original Downtown Ford Auto Dealership development plan, operations of a fueling station was evaluated for potential health risk impacts on nearby residents. The Downtown Ford IS/MND found that a 12-pump gas station would result in a cancer risk below the SMAQMD threshold of 10 in one million and would not be considered significant. In contrast, the proposed project would only have 10 gas pumps. As part of the conditions approved in the IS/MND, a gasoline station selling more than 480,000 gallons annual would be required to install Phase I&II vapor recovery systems. The Downtown Ford IS/MND concluded that the resulting cancer risk for underground storage tanks with vapor recovery systems, even at very close distances, would be no more than five per million. The proposed project's refueling station would abide by the vapor recovery requirements and therefore, would have a less-than-significant impact on nearby residents.

The Downtown Ford IS/MND evaluated CO concentrations qualitatively by using level of service in a screening approach. The Downtown Ford IS/MND determined that the project would not result in localized ambient CO concentrations that would violate the ambient air quality standards. Because of these criteria air pollutants and the Sacramento Valley Air Basin has been in attainment for these criteria air pollutants for multiple years, the operational activities are not likely to generate quantities substantial enough to have impacts on CO attainment status. Therefore, the proposed project would not contribute to an exceedance of the CO ambient air quality standards and impacts would not be greater than those previously analyzed in the Downtown Ford IS/MND.

## VI. Biological Resources

The project site is currently vacant, undeveloped land that is routinely disced and was previously mass-graded. A biological survey was conducted prior to grading activities, and the survey did not detect the presence of any special-status species. In addition, prior to grading, the required Natomas Basin Habitat Conservation Plan (NBHCP) mitigation fees were paid for the project site, in September of 2003.<sup>6</sup>

The Downtown Ford IS/MND describes the biological resources present and analyzes the potential for special status species to occur within a larger area that includes the project site. Regionally occurring special-status species lists from the U.S. Fish and Wildlife

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<sup>6</sup> City of Sacramento, 2013. HCP Fees Paid and Grading Permit Status. Available: <http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Natomas/HCP-fees-paid-2013.pdf?la=en>. Accessed September 23, 2020.

Service (USFWS),<sup>7</sup> the California Natural Diversity Database (CDFW)<sup>8</sup>, and the California Native Plant Society (CNPS)<sup>9</sup> were reviewed (Attachment 2) to ensure that no additional species identified within the Downtown Ford IS/MND have the potential to occur within the project site. A reconnaissance-level biological survey of the project site was conducted on September 23, 2020. The purpose of the survey was to document existing conditions and to evaluate whether the biological resources evaluated within the Downtown Ford IS/MND are consistent with the existing conditions.

The project site is completely surrounded by developed and disturbed areas including paved roads to the east and south, disturbed grassland followed by Interstate-80 to the west, and active construction of residential development to the north and northeast. The project site consists of highly disturbed non-native grassland including milk thistle (*Silybum marianum*), Johnson's grass (*Sorghum halepense*), horseweed (*Erigeron canadensis*), mustard (*Brassica* sp.), turkey-mullein (*Croton setigerus*), filaree (*Erodium* sp.), riggut brome (*Bromus diandrus*), and wild oat (*Avena fatua*). No small mammal burrows were observed within the disturbed grassland of the project site. The project site lacks trees and sensitive habitats including wetlands or other waters of the U.S.

The existing conditions identified within the Downtown Ford IS/MND align with the conditions on the project site based on the September 23, 2020 reconnaissance-level survey regarding the lack of trees, wetlands or waters of the U.S., or regulated sensitive habitats occurring within the project site. The project would not result in the removal of any native or heritage trees, would not result in the fill of aquatic resources, and would not result in impacts to natural communities including riparian areas, vernal pools, or wetlands. Therefore, project-related impacts to trees, wetlands or other waters of the U.S., or natural communities are considered less than significant and no mitigation is required.

As identified within the Downtown Ford IS/MND and based on existing conditions observed during the September 23, 2020 reconnaissance-level biological survey, no special status plants have the potential to occur within the project site due to lack of suitable habitat. Therefore, project-related impacts to special status plants are considered less than significant and no mitigation is required.

As identified within the MND and based on existing conditions observed during the September 23, 2020 reconnaissance-level biological survey, the project site provides low-quality foraging habitat for Swainson's hawk (*Buteo swainsoni*), one of the 18 special-status wildlife species listed in the NBHCP. While no nesting habitat occurs onsite for

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<sup>7</sup> U.S. Fish and Wildlife Service (USFWS), 2020. List of Threatened and Endangered Species that May Occur in Your Proposed Project Location, and/or May Be Affected by Your Proposed Project. Consultation Code: 08ESMF00-2020-SLI-2957. September 23, 2020.

<sup>8</sup> California Department of Fish and Wildlife (CDFW), 2020. California Natural Diversity Database (CNDDDB) List of Special Status Species Known to Occur on the Sacramento West U.S. Geological Quadrangle and the 8 Surrounding Quadrangles. September 23, 2020.

<sup>9</sup> California Native Plant Society (CNPS), 2020. List of Special Status Plants Known to Occur on the Sacramento West U.S. Geological Quadrangle and the 8 Surrounding Quadrangles. September 23, 2020.

Swainson's hawk, potentially suitable nesting habitat exists within 0.25-miles of the project site.

NBHCP fees were previously purchased for the loss of habitat associated with a larger area of land that includes the project site. As stated in the Downtown Ford IS/MND, the project applicant is still required to comply with the NBHCP, which requires preconstruction surveys be conducted. The project applicant shall complete preconstruction surveys for special-status species not less than 30 days or more than 6 months prior to construction activities. The preconstruction survey shall be conducted by a qualified biological, botanical, or related expert. Should any special-status species be identified, appropriate measures shall be implemented in compliance with the NBHCP, including protocol-level mitigation measures for special status species. Therefore, impacts are considered less than significant, with mitigation incorporated.

Project impacts would not be significantly changed from those previously analyzed in the Downtown Ford IS/MND. The proposed project would not have more significant impacts than were identified within the IS/MND or increase the severity of impacts discussed therein. No additional mitigation measures are described herein that were not considered in the IS/MND.

## VII. Cultural Resources and Tribal Cultural Resources

The project site is currently vacant, undeveloped land that has been graded. Records at the North Central Information Center (NCIC) of the California Historical Resource Information System (conducted on October 31, 2019) indicate that no cultural resources have been previously recorded on the project site or within a ¼-mile radius. An intensive cultural resources survey of the project site was completed on September 25, 2020 and no cultural resources were identified. Review of the Sacramento 2035 General Plan Master EIR determined that the project site is not within an area of high or moderate archaeological sensitivity. Mitigation Measure 2 in the Downtown Ford IS/MND includes protocol to address impacts relating to the inadvertent discovery of historic or archaeological resources and human remains. Implementation of this measure would reduce potential impacts to less than significant.

Project impacts would not change from the previous analysis in the Downtown Ford IS/MND. No new or significant resources have been identified within or near the project site. Thus, relative to the project analyzed in the Downtown Ford IS/MND, the proposed project would not be a substantial change, requiring major revisions to the cultural resources analysis in the Downtown Ford IS/MND. In addition, substantial changes to the circumstances relating to cultural resources under which the proposed project would be undertaken, have not occurred. The proposed project would not have more significant effects that were not discussed in the previous Downtown Ford IS/MND, or increase the severity of impacts discussed therein. For these reasons, impacts to cultural resources from the proposed project would not require the preparation of a subsequent EIR.

## VIII. Energy and Mineral Resources

The Energy section of the Downtown Ford IS/MND described the existing site and evaluated potential impacts of the project with respect to energy use and accessibility for the project site. Electrical service for the project site is provided by the Sacramento Municipal Utilities District (SMUD) and natural gas service is provided by Pacific Gas and Electric (PG&E).

As analyzed in the Downtown Ford IS/MND, existing supplies are adequate for the previously approved, more intensive Park El Camino project. Additionally, the City's PUD guidelines incorporate additional required energy conservation measures in conjunction with federal, State and local requirements. Development of the proposed project would generate similar demand for gas and electricity services as anticipated for the site in the 2035 Sacramento General Plan, and gas and electricity lines currently exist adjacent to the project site. Further, the applicant would be required to construct the necessary infrastructure on-site to serve the project. With the expected energy demand at the site as analyzed in the Downtown Ford IS/MND, and services attributed to the project not requiring new sources of energy, a less than significant impact would result.

The proposed project site would have the same energy requirements as were described in the Downtown Ford IS/MND and comply with the updated 2019 State Building Energy Efficient Standards (Title 24). Therefore, impacts to energy infrastructure would be consistent with those previously analyzed. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Initial Study, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND. Further, there are no mitigation measures that were not considered in the Downtown Ford IS/MND, that would more substantially reduce the potential effects of the proposed project on energy or mineral resource uses. For these reasons, impacts related to energy and mineral resources from the proposed project would not require the preparation of a subsequent IS/MND or EIR.

## IX. Geology, Soils, Seismicity, and Paleontological Resources

### **Seismic Hazards**

The seismic ground shaking conditions at the proposed project site would be the same as those of the originally-proposed project site, as described in the Downtown Ford IS/MND.

As described in Section 5 of the IS/MND, the City of Sacramento requires implementation of Uniform Building Code (UBC) requirements that recognize State and federal earthquake protection. The State of California provides minimum standards for building

design in Chapter 23 of the California Building Code (CBC) (Title 24 of California Code of Regulations), which is based on the UBC, but is more stringent and detailed than the federal code. Chapter 16 of the CBC further requires that the design of foundation and excavation-wall supports must reduce the exposure to potentially damaging seismic vibrations through seismic-resistant design (Section A33 – Excavation and Grading).

The project site would not be located on an area of any known faults or Alquist-Priolo special study zones. Additionally, the 1973 Maximum Expectable Earthquake Intensity Map produced by the California Division of Mines and Geology identifies the project site as being within in the Seismic Zone II, Moderate Severity Zone. Development associated with the proposed project would conform to the regulatory requirements and associated design standards of the CBC. Therefore, the impacts of seismic ground shaking, liquefaction, and associated hazards would remain less than significant. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the analysis of anticipated development within the Downtown Ford IS/MND, result in new significant impacts relating to seismic hazards or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required.

## Erosion

There is potential for erosion and/or unstable earth conditions as a result of the construction activities that would result from development of the project site. As identified in the Downtown Ford IS/MND, liquefaction is the only known geologic hazard in South Natomas, including the project site. This potentially-significant impact would be mitigated to a less-than-significant level through implementation of construction design measures that would reduce impacts related to potential for soils to shrink and swell. Corrective design measures include diverting runoff away from building foundations and importation of soil materials. The potential for subsidence would be further minimized through implementation of the provisions of the UBC.

Development of the proposed project would comply with the City's standards set forth in the "Administrative and Technical Procedures Manual for Grading and Erosion and Sediment Control."<sup>10</sup> The proposed project would also comply with the City's grading ordinance (Chapter 15.88 of Sacramento City Code), which specifies construction standards to minimize erosion and runoff and requires the preparation and implementation of an erosion and sediment control plan. As a result of compliance with these regulatory requirements, the potential for erosion as a result of the proposed project would be minimized, and the impact would be less than significant. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the anticipated development analyzed in the Downtown Ford IS/MND, result in new significant impacts relating to erosion or significant impacts that are substantially

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<sup>10</sup> City of Sacramento Department of Utilities, 2013. Department of Conservation Website: Seismic Hazard Zones. Available: <https://www.google.com/search?q=city+of+sacramento+Administrative+and+Technical+Procedures+Manual+for+Grading+and+Erosion+and+Sediment+Control&ie=utf-8&oe=utf-8&client=firefox-b-1-ab#>. Accessed April 24, 2018.

more severe than significant impacts previously disclosed. No new mitigation measures would be required.

### **Unstable Soils, Subsidence, and Topography**

In the Downtown Ford IS/MND, the City determined that impacts relating to geology and soils would be less than significant. Landslides are not considered to be a potential threat to the project area given its relatively flat topography and lack of unique geological or physical features that could result in a landslide. The City determined in the Downtown Ford IS/MND that the project site consists primarily of Sailboat silt loam and Cosumnes silt loam. Consistent with anticipated development of the project site, the proposed project would not include any long-term permanent groundwater pumping or dewatering activities. Furthermore, as described in the Downtown Ford IS/MND, the City of Sacramento requires the results of site-specific soil investigations to be incorporated into the engineering and seismic designs for individual structures proposed for development at the site prior to the issuance of building permits. These investigations are intended to identify potentially unsuitable soil conditions, including possible exposure to potentially damaging seismic vibrations, ground failure, liquefaction, settlement, subsidence, lateral spreading, and collapse. As part of the construction permitting process, the soil evaluations must contain recommendations for areas of potentially unstable soils specific to the site, and be incorporated into the construction design. Therefore, impacts related to unstable soils, subsidence, or unique topographical issues would be less than significant.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the project analyzed in the Downtown Ford IS/MND, result in new significant impacts relating to unstable soils, subsidence, or topography, or result in significant impacts that are substantially more severe than significant impacts previously described in the Downtown Ford IS/MND. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND. Nor is there new information of substantial importance showing (i) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the previous Initial Study would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative. For these reasons, impacts relating to geology, soils, or seismicity from the proposed project would not require the preparation of a subsequent EIR.

## **X. Global Climate Change**

A discussion of project contribution to climate change was included in the Section 2. Air Quality, of the Downtown Ford IS/MND. The analysis concluded that based on the size

of the project, and that the proposed project would consist of standard urban uses, the project would not result in a potentially-significant impact related to contribution to climate change.

Since the adoption of the Downtown Ford IS/MND, the City of Sacramento has incorporated Global Climate Change or Greenhouse Gas Emissions as a required topic for environmental analysis. The City further adopted the Sacramento Climate Action Plan (CAP) on February 14, 2012. It identified how the City and broader community can reduce Sacramento's GHG emissions. The CAP included GHG reduction targets, strategies, and specific actions. It also identified strategies and specific actions which Sacramento can take to adapt to the effects of climate change. The CAP was later incorporated into the 2035 General Plan as CAP policies and adopted on March 3, 2015. The City's CAP policies include several initiatives to reach its goals of reducing community-wide emissions by 15 percent below 2005 levels by 2020, 38 percent below 2005 levels by 2030, and 83 percent below 2005 levels by 2050. Appendix B of the General Plan is entitled, "Climate Action Plan Policies and Programs." Most of the listed items are "supporting," which, in this context, means that the implementation of these policies or programs would *support* the City's overall efforts to reduce local sources of GHG emissions. Those policies that are relevant to the proposed project and for which the City has estimated the effectiveness for 2020 and 2035 emission reduction are presented and discussed below.

***Policy LU 2.5.1: Connected Neighborhoods, Corridors, and Centers.*** The City shall require that new development, both infill and greenfield, maximizes connections and minimizes barriers between neighborhoods, corridors, and centers within the City.

The proposed project would include pedestrian pathways around and through the project site maintaining community access across the project site to uses within and near the project site. For this reason, the proposed project would be consistent with the intent of Policy LU 2.5.1, and would support the City's goal of connected neighborhoods.

***Policy LU 2.6.1: Sustainable Development Patterns.*** The City shall promote compact development patterns, mixed use, and higher-development intensities that use land efficiently; reduce pollution and automobile dependence and the expenditure of energy and other resources; and facilitate walking, bicycling, and transit use.

As discussed in Section I. Land Use and Planning, the proposed project would comply with the City's General Plan and zoning land use designation for the project site. The project would develop uses that would be community-serving and serve as highway-commercial uses on a site adjacent to a major transportation route. The City's goals for suburban centers is to provide such uses along major thoroughfares, transportation

routes, and corridors. Project consistency with the City's zoning and land use designation for the project site supports the implementation of Policy LU 2.6.1.

**Policy LU 2.6.8: Heat Island Effect.** The City shall reduce the "heat island effect" by promoting and requiring, where appropriate, such features as reflective roofing, green roofs, light-colored pavement, and urban shade trees and by reducing the unshaded extent of parking lots.

The proposed project would construct a commercial development that would include numerous shade trees and light-colored pavement, intended to provide shade across the majority of paved areas within the project site. As is required by the City's shade tree ordinance (Sacramento City Code section 17.612.040), the proposed project would plant a canopy of trees that would be shade more than fifty percent of the project parking lot within 15 years. The proposed project also includes landscaped open space areas throughout the project site.

**Policy M 2.7.6: Walkable Blocks.** The City shall require new development and reuse and reinvestment projects to create walkable, pedestrian-scaled blocks, publicly accessible mid-block and alley pedestrian routes where appropriate, and sidewalks appropriately scaled for the anticipated pedestrian use.

The proposed project would construct a network of pedestrian routes around and through the project site. Pedestrian routes would be scaled for anticipated use.

**Policy M 2.1.1: Pedestrian Master Plan.** The City shall maintain and implement a Pedestrian Master Plan that carries out the goals and policies of the General Plan. All new development shall be consistent with the applicable provisions of the Pedestrian Master Plan.

The proposed project would construct connections with existing sidewalks along West El Camino Avenue, Orchard Lane, and Orchard Court. The proposed project's pedestrian amenities would meet the City of Sacramento's Consistency Checklist for pedestrian facilities. The proposed project would make the area more attractive and accessible to pedestrians as the project would construct ways to access the project site via improved sidewalks. The proposed improvements would be context-sensitive to the neighborhood setting and proximity to surrounding residential uses.

- Program: 11 The City shall implement the Bikeway Master Plan by (1) increasing, or causing to be increased the amount of secure bicycle parking within the City by 50 locations annually, and (2) expanding the existing bikeway system by 5 percent annually. (CAP Action 2.3.1)

The proposed project would include on-site bike storage for use by project employees and patrons of the proposed uses. The project would include short-term and long-term bicycle storage facilities outside each of the retail buildings. The proposed project would preserve and continue the Class II bike lanes and pedestrian sidewalks exist along West El Camino Avenue and Orchard Lane, which provide access to the proposed project site

and residential uses to the north and northeast, which are in the process of being constructed.

**Policy U 2.1.10: Water Conservation Standards.** The City shall achieve a 20 percent reduction in per-capita water use by 2020 consistent with the State's 20x2020 Water Conservation Plan (California Water Resources Control Board, 2010).

The proposed project would comply with the minimum CALGreen Tier 1 Water Efficiency Measures as a condition of approval, thereby decreasing water usage and increasing efficiency.

In summary, the proposed project is consistent with each applicable General Plan policy and implementation program that has GHG emissions reductions calculated as a part of the 2035 General Plan and that would be relevant to the proposed project.

The 2035 General Plan Master EIR evaluated greenhouse gas emissions related to development anticipated in the City based on land use designations and anticipated citywide growth. Because the proposed project would not change the General Plan land use designation for the project site, the greenhouse gas emissions for the proposed project would be consistent with the General Plan and CAP policies therein. In addition, the proposed project would be constructed in an area with pedestrian access via sidewalks and public transportation and would not conflict with the City's Pedestrian Master Plan and Bikeway Master Plan. The proposed project would be designed in compliance with the 2019 Title 24 Building Energy Efficiency Standards. Since development under the General Plan, including development of the project site, has been analyzed in the 2035 General Plan Master EIR and greenhouse gas emissions have already been considered, the proposed project would not conflict with the implementation of the City's CAP policies.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the project analyzed in the Downtown Ford IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed. Nor is there new information of substantial importance showing that mitigation measures considerably different from those analyzed in the IS/MND would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative. For these reasons, impacts from the proposed project that would contribute to global climate change would not require the preparation of a subsequent IS/MND or EIR.

## XI. Hazards and Hazardous Materials

### **Accidental Release of Hazardous Substances**

The Downtown Ford IS/MND described the project as including relocation of an auto dealership and would include routine transport, handling, use, storage, and disposal of hazardous materials. The IS/MND noted that potentially hazardous liquid materials such as oil, diesel fuel, gasoline, and hydraulic fluid would be used onsite. However, the IS/MND concluded that construction and operation of all project components would be required to comply with applicable building health, fire, and safety codes. The use, handling, and storage of hazardous materials is highly regulated by both the Federal Occupational Safety and Health Administration (Fed/OSHA) and the California Occupational Safety and Health Administration (Cal/OSHA). Cal/OSHA is responsible for developing and enforcing workplace safety regulations. Both federal and State laws include special provisions/training for safe methods for handling any type of hazardous substance. For these reasons, the City determined in the Downtown Ford IS/MND, that the project site would have a less-than-significant impact on accidental release of hazardous substances.

The proposed project would include a 10-pump gas station with underground fuel storage tanks. There would be routine transport, handling, use, and storage of diesel and gasoline onsite. Fuel trucks would deliver diesel and gasoline throughout the week for storage onsite. The gas station would operate 24 hours per day. The gas station and transport of hazardous materials would be subject to federal, State, and local regulations.

Based on the uses within the proposed project, hazardous materials would not be used, stored, or transported in a manner that would cause a threat to public safety, either during construction or operation of the proposed project. The use and transportation of hazardous materials are subject to stringent local, State, and federal regulations, the intent of which is to minimize the public's risk of exposure. Therefore, the risk that the proposed project would cause an accidental release of hazardous materials that could create a public or environmental health hazard is unlikely, and the impact of construction and medical operation-related hazardous chemical use would be considered less than significant and no new or previously dismissed mitigation measures would be required.

### **Contaminated Soil or Groundwater**

The Downtown Ford IS/MND evaluated the potential for exposure to contaminated soil or contaminated groundwater. The IS/MND cited the Phase I Environmental Site Assessment (Phase I), prepared in 1997 by RGA Environmental Inc, which found no evidence of hazardous materials to be present on the project site. Additionally, a hazardous materials database search found no underground storage tanks (LUSTs) or underground storage tanks (USTs) within the vicinity of the project area.

Based on a review of the Cortese List conducted in February 15, 2019, there are no active sites on the proposed project site or within 0.5 miles of the project site.<sup>11</sup> Accordingly, changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in new significant impacts relating to hazardous materials or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. For these reasons, impacts related to hazards from exposure to contaminated soil or groundwater resulting from implementation of the proposed project would not require the preparation of a subsequent EIR.

### **Emergency Evacuation Plan**

As described in the Downtown Ford IS/MND, development of the project would include an internal access road extending from Orchard Lane. This internal access would provide four driveways to the project site and therefore, development of the Downtown Ford Auto Dealership project would not be anticipated to impair the implementation of, or physically interfere with, an emergency response plan or emergency evacuation plan. The proposed project would develop the project site similar to anticipated development levels analyzed in the Downtown Ford IS/MND. Development would not require substantial road closures or other elements that may impair the implementation of, or physically interfere with, an emergency response plan or emergency evacuation plan. This project impact would remain less than significant and no mitigation would be required.

### **Fire Hazards**

Impacts related to Fire Hazards as a result of the proposed project were evaluated in the Downtown Ford IS/MND. As described in the IS/MND, the project site has been mass graded and is clear of trees and brush. Additionally, the project would not include residential development and would not be located adjacent to or intermixed with wildlands. The proposed project would develop the project site with urbanized uses, similar to anticipated development analyzed in the IS/MND. The proposed project would be subject to similar conditions for which vegetation management practices would remain applicable and effective in minimizing the potential fire hazards from construction. For this reason, this impact would remain less than significant and no new or previously dismissed mitigation measures would be required.

### **Conclusion**

As they relate to hazards and hazardous materials, project impacts would not be significantly changed from those previously analyzed in the Downtown Ford IS/MND. The proposed project would not have more significant impacts than were identified within the IS/MND or increase the severity of impacts discussed therein. No additional mitigation measures are described herein that were not considered in the IS/MND. For this reason,

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<sup>11</sup> Enviro Assessment PC, 2019. Phase I Environmental Site Assessment El Camino & Orchard Lane Property, West El Camino Avenue, Sacramento, CA.

impacts relating to hazards or hazardous materials resulting from the proposed project would not require the preparation of a subsequent EIR.

## XII. Hydrology and Water Quality

### Risk of Flooding

The Downtown Ford IS/MND identified the project site as not being located within a 100-year flood hazard area, a potential seepage area, or drainage and flood problem area. The IS/MND identified that the project site is in a Rescue Area and would be required to follow the development guidelines specified in the City of Sacramento Comprehensive Flood Management Plan. The IS/MND stated that the Downtown Ford project would not place housing within a 100-year flood hazard area or structures that would impede or redirect flows within a 100-year flood hazard area, and therefore impacts related to the risk of flooding would be less than significant, and no mitigation would be required

In June 2015, subsequent to adoption of the Downtown Ford IS/MND, the Federal Emergency Management Agency (FEMA) approved an A99 flood zone designation for the Natomas Basin, which includes the project site.<sup>12</sup> An A99 designation is an interim flood zone designation that does not diminish the risk consideration for the flood zone, but allows for construction if certain conditions are met. Mandatory flood insurance purchase requirements and floodplain management are required of properties located in Zone A99.<sup>13</sup> At a minimum, projects located within Zone A99 are required to adhere to the floodplain management and building requirements set forth in Section 60.3 of the National Flood Insurance Program (NFIP) regulations, which include, but are not limited to, the following:<sup>14</sup>

- Review all permit applications to determine whether proposed building sites will be reasonably safe from flooding. If a proposed building site is in a flood-prone area, all new construction and substantial improvements shall (i) be designed (or modified) and adequately anchored to prevent flotation, collapse, or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads, including the effects of buoyancy, (ii) be constructed with materials resistant to flood damage, (iii) be constructed with electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding.

<sup>12</sup> Federal Emergency Management Agency, 2015. Flood Insurance Rate Map, Sacramento County: Map Number 06067C0045J. Available: <https://msc.fema.gov/portal/search?AddressQuery=2828%20EI%20Centro%20Road%20Sacramento#searchresultsanchor>. Accessed September 24, 2020.

<sup>13</sup> Federal Emergency Management Agency, 2014. Adequate Progress on Flood Control Systems: Zone A99 Requirements Summary for State and Local Officials. Available: [https://www.fema.gov/media-library-data/1417370512021-87d10b406536999e03e3f63fe55873f5/Zone\\_A99\\_Fact\\_Sheet.pdf](https://www.fema.gov/media-library-data/1417370512021-87d10b406536999e03e3f63fe55873f5/Zone_A99_Fact_Sheet.pdf). Accessed September 24, 2020.

<sup>14</sup> Federal Emergency Management Agency, 2005. National Flood Insurance Program (NFIP) Floodplain Management Requirements: A Study Guide and Desk Reference for Local Officials. Available: [https://www.fema.gov/media-library-data/1481032638839-48ec3cc10cf62a791ab44ecc0d49006e/FEMA\\_480\\_Complete\\_reduced\\_v7.pdf](https://www.fema.gov/media-library-data/1481032638839-48ec3cc10cf62a791ab44ecc0d49006e/FEMA_480_Complete_reduced_v7.pdf). Accessed September 24, 2020.

The proposed project would be required to comply with floodplain management and building requirements of Section 60.3 of the NFIP, consistent with the A99 flood zone designation.

Although the flood designation has changed, this revised designation does not impact the risk determination for the project site as described in the IS/MND. Therefore, the potential for the proposed project to exacerbate flood elevations or to be affected by flood conditions would be the same as those analyzed in the IS/MND. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the IS/MND, result in new significant impacts relating to flooding or impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required.

### **Construction-Related Impacts to Surface Water**

The Downtown Ford IS/MND analyzed impacts to surface waters from development of the approximately 11.75-acre Downtown Ford Auto Dealership project site that had been cleared and graded but was not developed. As described in the IS/MND, anticipated development on the project site would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP), which regulates stormwater runoff from construction sites pursuant to the Clean Water Act (CWA). Under the requirements of the CGP, construction contractors would be required to prepare and implement a construction stormwater pollution prevention plan (SWPPP) that would employ best management practices (BMPs) to prevent or reduce any adverse impacts to surface water quality resulting from construction activities. The IS/MND also identified that the Downtown Ford project would be required to comply with all applicable City codes and requirements pertaining to water quality and would be required to submit grading and drainage plans for review and approval by the City. The IS/MND concluded that implementation of the required BMPs and construction of on-site drainage improvements to City specifications would ensure that construction-related impacts to surface water would be less than significant, and no additional mitigation measures would be required.

The proposed project would be subject to and implement all of the stormwater and erosion prevention requirements described in the IS/MND, including obtaining a CGP and implementing a SWPPP. The proposed project would implement present-day BMPs for the prevention of impacts to surface waters from construction activities, would be required to comply with all applicable City codes and requirements pertaining water quality, and would be required to submit grading and drainage plans for review and approval by the City. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in new significant construction-related impacts to surface water that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required.

## Operational Water Quality

The Downtown Ford IS/MND included analysis of potential impacts to water quality from urban runoff from the Downtown Ford project site. The IS/MND identified that the Downtown Ford project would increase impervious surfaces within the project site that would alter the types and levels of pollutants that could be present in project site runoff. The IS/MND stated that project applicants would be required to comply with the City's stormwater management and discharge control requirements, including demonstration to the satisfaction of the City Utilities Director that the proposed project would include adequate stormwater drainage facilities prior to issuance of a building permit or certificate of occupancy prior to occupancy of any building. The IS/MND concluded that conformance of the project with the regulations and standards described above would ensure that operational water quality impacts would be less than significant.

In 2015, the City of Sacramento adopted the 2035 General Plan, which included policy updates intended to provide adequate stormwater drainage facilities and services that are environmentally-sensitive, accommodate growth, and protect residents and property (Goal U 4.1) for anticipated development.<sup>15</sup> The 2035 General Plan included the following policies, intended to improve adverse impacts from urban runoff:

***Policy U 4.1.5: Green Stormwater Infrastructure.*** The City shall encourage “green infrastructure” design and Low Impact Development (LID) techniques for stormwater facilities (i.e., using vegetation and soil to manage stormwater) to achieve multiple benefits (e.g., preserving and creating open space, improving runoff water quality).

***Policy U 4.1.6: New Development.*** The City shall require proponents of new development to submit drainage studies that adhere to City stormwater design requirements and incorporate measures, including “green infrastructure” and Low Impact Development (LID) techniques, to prevent on- or off-site flooding.

The proposed project would add approximately 2.96 acres of impervious area to the project site, which would be managed on-site through an internal drainage system that would include storm drains interspersed throughout the project site and two stormwater quality/detention basins located on the north side of the project site. The proposed stormwater quality/detention basins would have a joint capacity of approximately 0.80 acre-feet, which would be adequate to accommodate stormwater flows from the project site and anticipated runoff generated by buildout of the adjacent parcel to the west of the project site. Each of the proposed detention basins would drain to an existing 36-inch storm drain main within Orchard Lane, which has been constructed to serve the project site and the Core Natomas residential development to the north of the project site.

The proposed project would be subject to and implement all of the regulatory requirements described in the Downtown Ford IS/MND, which would minimize potentially adverse impacts from urban runoff. Required implementation of policies from the 2035

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<sup>15</sup> City of Sacramento, 2015. *2035 General Plan*. March 3, 2015.

General Plan, requiring the implementation of LID design features and efficiencies into new development would further minimize potential adverse effects. LID features incorporated into proposed project design include the two stormwater quality/detention basins located on the north side of the project site. With the incorporation of LID features into project design and conformance with City, regional, and statewide stormwater runoff requirements, impacts to surface water from urban runoff originating from the project site would be less than significant and would not require mitigation. The proposed project would not have more significant effects related impacts to urban runoff than were discussed in the Downtown Ford IS/MND or increase the severity of those impacts discussed therein. Under existing conditions, the proposed project would not make feasible, mitigation measures that were found to be infeasible in the Downtown Ford IS/MND. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in new significant operational impacts to surface water that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required.

## **Groundwater**

Analysis of potential impacts to groundwater in the Downtown Ford IS/MND, concluded that neither construction nor operation of the Downtown Ford Auto Dealership project would result in adverse impacts to groundwater resources. This conclusion was based on the fact that the project would use water from existing City surface water supplies and would not use groundwater resources, and that required compliance with federal, state, and local requirements pertaining to water quality during construction and operation of the project would ensure impacts to groundwater resources would be less than significant.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the IS/MND, result in new significant operational impacts to groundwater resources. Ground-disturbing construction activities would include trenching for utility connections, grading, and other minimally invasive earthmoving, and would not involve substantial excavation. While unlikely, if dewatering is deemed necessary at the project site, it could result in a short-term change in the quantity of groundwater, the direction or rate of flow, and groundwater quality. Dewatering activities would comply with application requirements established by the Central Valley Regional Water Quality Control Board (CVRWQB) to ensure that dewatering activities would not result in adverse changes to groundwater. The proposed project would not be anticipated to require significant excavation such that groundwater resources would be adversely affected. The construction processes for the proposed project would be the same as those processes anticipated and analyzed in the Downtown Ford IS/MND. As with the project analyzed in the IS/MND, the proposed project would use water from existing City surface water supplies and would not use groundwater resources during operation. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the IS/MND, result in new significant operational impacts to groundwater resources that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required.

## Summary

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in new significant impacts relating to hydrology or water quality, or significant impacts that are substantially more severe than impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the previous IS/MND. Nor is there new information of substantial importance showing (i) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the previous IS/MND would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative. For these reasons, impacts to hydrology or water quality from the proposed project would not require the preparation of a subsequent EIR or IS/MND.

## XIII. Mineral Resources

Mineral resources were not analyzed in the Downtown Ford Auto Dealership Project IS/MND.

The Surface Mining and Reclamation Act (SMARA) directs the State Geologist to classify (identify and map) the non-fuel mineral resources of the State to show where economically significant mineral deposits occur and where they are likely to occur based upon the best available scientific data. Areas known as Mineral Resource Zones (MRZs) are classified on the basis of geologic factors, without regard to existing land use and land ownership. The areas are categorized into four general classifications (MRZ-1 through MRZ-4). The project site is in an area designated MRZ-1, which is classified by the State Geologist as an area where available geologic information indicates there is little or no likelihood for presence of significant mineral resources.<sup>16</sup> Consequently, the proposed project would not be anticipated to result in the loss of availability of a mineral resource, and the proposed project would have no impact on mineral resources.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in

<sup>16</sup> California Geological Survey, 2018. Mineral Land Classification Map of Concrete Aggregate in the Greater Sacramento Area Production-Consumption Region. Available: [https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR\\_245-MLC-Plate01-SECURED.pdf](https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_245-MLC-Plate01-SECURED.pdf). Accessed September 25, 2020.

the Downtown Ford IS/MND. Further, there are no mitigation measures that were not considered in the Downtown Ford IS/MND, that would more substantially reduce the potential effects of the proposed project on recreational uses. For these reasons, impacts related to mineral resources from the proposed project would not require the preparation of a subsequent IS/MND or EIR.

#### XIV. Noise

Section 10 of the Downtown Ford IS/MND analyzed the noise and vibration impacts of locating an 88,545 square foot auto dealership at the project site. The differences in noise and vibration impacts of the proposed project, relative to those in the Downtown Ford IS/MND, are discussed below. Any changes to the environmental and regulatory setting since the publication of the Downtown Ford IS/MND are also highlighted.

##### **City of Sacramento 2035 General Plan**

Since the publication of the Downtown Ford IS/MND, the City of Sacramento has adopted the 2035 City General Plan in 2015. The following goals and policies from the 2035 General Plan, relevant to noise and vibration are applicable to the proposed project.

**Goal EC 3.1: Noise Reduction.** Minimize noise impacts on human activity to ensure the health and safety of the community.

**Policy EC 3.1.1: Exterior Noise Standards.** The City shall require noise mitigation for all development where the projected exterior noise levels exceed those shown in Table EC 1 (shown below in **Table 9**), to the extent feasible.

**TABLE 9**  
**EXTERIOR NOISE COMPATIBILITY STANDARDS FOR VARIOUS LAND USES**

<b>Land Use Type</b>	<b>Highest Level of Noise Exposure that is Regarded as “Normally Acceptable”<sup>a</sup> (L<sub>dn</sub><sup>b</sup> or CNEL<sup>c</sup>)</b>
Residential—Low Density Single Family, Duplex, Mobile Homes	60 dBA <sup>d,e</sup>
Residential—Multi-family	65 dBA
Urban Residential Infill <sup>f</sup> and Mixed-Use Projects <sup>g</sup>	70 dBA
Transient Lodging—Motels, Hotels	65 dBA
Schools, Libraries, Churches, Hospitals, Nursing Homes	70 dBA
Auditoriums, Concert Halls, Amphitheaters	Mitigation based on site-specific study
Sports Arena, Outdoor Spectator Sports	Mitigation based on site-specific study
Playgrounds, Neighborhood Parks	70 dBA
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75 dBA
Office Buildings—Business, Commercial and Professional	70 dBA

**TABLE 9**  
**EXTERIOR NOISE COMPATIBILITY STANDARDS FOR VARIOUS LAND USES**

Industrial, Manufacturing, Utilities, Agriculture	75 dBA
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## NOTES:

- a As defined in the State of California General Plan Guidelines, “Normally Acceptable” means that the “specified land use is satisfactory, based upon the assumption that any building involved is of normal conventional construction, without any special noise insulation requirements.”
- b  $L_{dn}$  or Day Night Average Level is an average 24-hour noise measurement that factors in day and night noise levels.
- c CNEL or Community Noise Equivalent Level measurements are a weighted average of sound levels gathered throughout a 24-hour period.
- d dBA or A-weighted decibel scale is a measurement of noise levels.
- e The exterior noise standard for the residential area west of McClellan Airport known as McClellan Heights/Parker Homes is 65 dBA.
- f With land use designations of Central Business District, Urban Neighborhood (Low, Medium, or High) Urban Center (Low or High), Urban Corridor (Low or High).
- g All mixed-use projects located anywhere in the City of Sacramento.

SOURCE: City of Sacramento, 2015. *City of Sacramento 2035 General Plan*. Adopted March 3, 2015. Page 2-350.

**Policy EC 3.1.2: Exterior Incremental Noise Standards.** The City shall require noise mitigation for all development that increases existing noise levels by more than the allowable increment shown in Table EC 2 (shown below in **Table 10**), to the extent feasible.

**TABLE 10**  
**EXTERIOR INCREMENTAL NOISE IMPACT STANDARDS FOR NOISE-SENSITIVE USES (DBA)**

Residences and Buildings where People Normally Sleep <sup>a</sup>		Institutional Land Uses with Primarily Daytime and Evening Uses <sup>b</sup>	
Existing $L_{dn}$	Allowable Noise Increment	Existing Peak Hour $L_{eq}$	Allowable Noise Increment
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

**TABLE 10**  
**EXTERIOR INCREMENTAL NOISE IMPACT STANDARDS FOR NOISE-SENSITIVE USES**  
**(DBA)**

Residences and Buildings where People Normally Sleep <sup>a</sup>		Institutional Land Uses with Primarily Daytime and Evening Uses <sup>b</sup>	
Existing $L_{dn}$	Allowable Noise Increment	Existing Peak Hour $L_{eq}$	Allowable Noise Increment

## NOTES:

a This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.

b This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

SOURCE: City of Sacramento, 2015. *City of Sacramento 2035 General Plan*. Adopted March 3, 2015. Page 2-351.

**Policy EC 3.1.5: Interior Vibration Standards.** The City shall require construction projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby residential and commercial uses based on the current City or Federal Transit Administration (FTA) criteria.

**Policy EC 3.1.8: Operational Noise.** The City shall require mixed-use, commercial, and industrial projects to mitigate operational noise impacts to adjoining sensitive uses when operational noise thresholds are exceeded.

**Policy EC 3.1.10: Construction Noise.** The City shall require development projects subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

**City of Sacramento Municipal Code (Noise Control Ordinance)**

The Sacramento Municipal Code includes noise regulations in Title 8 – Health and Safety, Chapter 8.68 – Noise Control (referred to generally as the Noise Control Ordinance). Of the regulations in Chapter 8.68, the following regulations would be applicable to the proposed Project:

- Section 8.68.080 exempts certain activities from Chapter 8.68, including “noise sources due to the erection (including excavation), demolition, alteration, or repair of any building or structure” as long as these activities are limited to between the hours of 7:00 am and 6:00 pm Monday through Saturday, and between the hours of 9:00 am and 6:00 pm on Sunday. The use of exhaust and intake silencers for internal combustion engines is also required. Construction work can occur outside of the designated hours if the work is of urgent necessity and in the interest of public health and welfare for a period not to exceed 3 days. Section 8.68.080 also exempts noise

from any mechanical device, apparatus, or equipment related to or connected with emergency activities or emergency work from Chapter 8.68 requirements.

- Section 8.68.060 sets standards for cumulative exterior noise levels at residential and agricultural properties, including exterior noise standards of 55 dBA from 7:00 am to 10:00 pm, and 50 dBA from 10:00 pm to 7:00 am. Per Section 8.68.060(b), the allowable decibel increase above the exterior noise standards in any one hour are:
  1. 0 dB for cumulative period of 30 minutes per hour;
  2. 5 dB for cumulative period of 15 minutes per hour;
  3. 10 dB for cumulative period of 5 minutes per hour;
  4. 15 dB for cumulative period of 1 minutes per hour; or
  5. 20 dB not to be exceeded for any time per hour.

In addition, per Section 8.68.060(c), each of the noise limits above shall be reduced by 5 dB for impulsive or simple tone noises, or for noises consisting of speech or music. If the ambient noise level exceeds that permitted by any of the first four noise limit categories specified in subsection (b) above, the allowable noise limit shall be increased in 5 dB increments in each category to encompass the ambient noise level. If the ambient noise level exceeds the fifth noise level category, the maximum ambient noise level shall be the noise limit for that category.

Based on standards in the Sacramento General Plan and municipal code, the proposed project would be considered to have a significant impact with respect to noise and vibration if:

- Project construction activities do not comply with the requirements of Section 8.68.080 of the Sacramento municipal code;
- On-site project operational activities would generate noise levels that exceed exterior noise compatibility standards in Section 8.68.060 of the Sacramento municipal code;
- Project traffic increases noise along roadways in the vicinity of the project site by more than the incremental levels specified in table X-2;
- Project construction or operational activities generate vibration levels in excess of 0.3 in/sec PPV at the nearest residences; or
- Project construction or operation would expose residents or workers to excessive aircraft noise levels.

## **Sensitive Receptors**

Some land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure (in terms of both exposure duration and insulation from noise), the populations that would be exposed, or the types of activities typically involved.

Residences, motels and hotels, schools, libraries, churches, hospitals, and nursing homes are land uses with users that are generally more sensitive to noise than are the users of commercial (other than lodging facilities), industrial, and other non-residential land uses.

Additional sensitive receptors in the form of residences have been introduced to the project area since the publication of the Downtown Ford IS/MND. The Regatta Apartments are located to the southeast of the project site across W El Camino Avenue. In addition, The Cove residential development, which is currently under construction and partially occupied, is located across Orchard Lane to the east and The Core Natomas apartments, also under construction currently, are located to the north across Orchard Court.

In addition, historic age buildings, eligible historic structures, or listed historic structures are considered sensitive to vibration impacts. As discussed in Section VII, Cultural Resources and Tribal Cultural Resources, no historic structures are located at or around the project site.

### **Construction Noise**

As presented in Section 10 (Noise) of the Downtown Ford IS/MND, construction activities could expose nearby sensitive receptors to temporarily elevated noise levels. However, since construction was proposed to occur within the construction exempt hours identified in the City of Sacramento municipal code, it was concluded that impacts related to construction noise would be less than significant. Construction of the proposed project would continue to be limited to the allowed hours specified in the Sacramento Municipal Code – between 7:00 am and 6:00 pm Monday through Saturday, and between 9:00 am and 6:00 pm on Sundays. Project construction would use similar construction equipment already anticipated and analyzed in the Downtown Ford IS/MND. In addition, the municipal code requires use of intake silencers on all internal combustion engines that power the construction equipment. The project would be required to comply with these requirements and would therefore be consistent with General Plan and noise ordinance standards. Therefore, project construction would result in a less-than-significant noise impact.

### **Operational Noise**

The project would generate operational noise from activities associated with the proposed commercial activities as well as an increase in traffic along roadways in the project vicinity.

The Downtown Ford IS/MND concluded that noise from operational activities as well as increase in traffic noise would be less than significant as resulting noise levels were found to be consistent with noise levels in an area in the vicinity of a freeway.

Commercial uses proposed as part of the project would generate operational noise primarily from vehicle activity to the site. In addition, Heating, Ventilation and Air Conditioning (HVAC) units, idling and unloading of delivery trucks would also generate noise. However, this noise would be minimal and would not be audible to the nearest receptors, the residents at the Core apartments located to the north of the project site.

HVAC units can generate noise levels of approximately 51 dBA  $L_{eq}$  at a reference distance of 100 feet from the operating units during maximum heating or air conditioning operations.<sup>17</sup> Truck loading and unloading activities typically generate a noise level of 60 dBA  $L_{eq}$  from a distance of 50 feet.<sup>18</sup> These noise levels would attenuate to levels less than the residential daytime exterior noise standard of 55 dBA,  $L_{eq}$ , and nighttime standard of 50 dBA,  $L_{eq}$  at the nearest receptors located approximately 200 feet north of the project site. Therefore, the proposed project would not result in new significant impacts or a substantial increase in severity of significant impacts related to on-site noise sources.

The project would also lead to an increase in operational noise from traffic generated by the uses proposed at the site. Based on the traffic study prepared for the project, the proposed uses would generate roughly 8,910 daily trips, with 907 trips in the a.m. peak hour and 776 trips during the p.m. peak hour. These trips would be distributed along the roadway network in the vicinity of the project site and would result in increase in noise levels along roadway segments and intersections leading to the project site.

Traffic noise levels along segments of West El Camino Avenue, which would be most affected by project traffic were determined using algorithms of the FHWA Traffic Noise Prediction Model Technical Manual and evening peak hour turning movements in the traffic section for existing, baseline, and baseline plus project conditions (see Section XVII, Transportation and Appendix 3). The baseline scenario includes trips associated with approved projects in the vicinity including The Cove and The Core Natomas residential developments to the east and north respectively, and the proposed hotel to the west of the project site. The segments analyzed and the modeled noise increases along these segments are shown in **Table 11** below. The increase in traffic noise is compared to the exterior incremental noise impact standards shown in Table 10.

**TABLE 11**  
**PROJECT PEAK-HOUR TRAFFIC NOISE LEVELS<sup>1,2</sup>**

Roadway Segment	Existing (A) (dBA)	Baseline (B) (dBA)	Baseline + Project (C) (dBA)	C – A (dBA)	Significance Threshold based on Existing Noise Level (dBA)	Noise Increase Significant?
<b>W El Camino Real</b>						
E of I-80 WB Ramps	67.6	68.1	68.2	+0.6	1	No
W of I-80 WB Ramps	66.6	66.7	66.8	+0.3	1	No
E of Orchard Lane	68.2	68.6	68.6	+0.5	1	No
W of Orchard Lane	68.7	69.3	69.4	+0.7	1	No
E of W River Dr./N Cove Dr.	68.3	68.8	68.8	+0.5	1	No
W of W River Dr./N Cove Dr.	68.2	68.6	68.6	+0.5	1	No

<sup>17</sup> Puron, 2005. *48PG03-28 Product Data*. p. 10 – 11.

<sup>18</sup> ESA, 2008. *Fresh & Easy Distribution Truck Noise Study*. November 2008.

Roadway Segment	Existing (A) (dBA)	Baseline (B) (dBA)	Baseline + Project (C) (dBA)	C – A (dBA)	Significance Threshold based on Existing Noise Level (dBA)	Noise Increase Significant?
E of Unity Park St.	68.4	69.0	69.1	+0.7	1	No
W of Unity Park St.	68.4	68.9	68.9	+0.6	1	No
E of Gateway Oaks Dr.	68.5	69.0	69.0	+0.6	1	No
W of Gateway Oaks Dr.	68.0	68.7	68.7	+0.8	1	No

## NOTES:

- 1 Noise levels were determine using methodology described in FHWA Traffic Noise Model Technical Manual and project traffic data from DKS Associates.
- 2 P.M. peak hour traffic data used.

The increase in traffic noise from the baseline plus project scenario compared to the baseline scenario would be less than the identified incremental thresholds from Table 10 at all studied roadway segments and would therefore be a less-than-significant impact with respect to traffic noise along these roadway segments.

### Construction Vibration

The Downtown Ford IS/MND determined that the distance separating the nearest receptors from the project site would be adequate to ensure a less than significant impact with respect to construction vibration. Vibration levels during construction would vary depending on soil conditions, construction methods, and equipment used. Project construction activities would include excavation, site preparation work, foundation work, and new building, framing, and finishing. Construction activities may generate perceptible vibration when heavy earth moving equipment or impact tools are used. Pile driving can cause excessive vibration; however, pile driving is not anticipated to be required as part of construction of the project.

A significant impact would occur if construction of the project would expose modern structures to ground-borne vibration levels in excess of 0.3 in/sec PPV, the level at which there could be potential cosmetic damage to normal buildings, consistent with the FTA's vibration damage criteria. For human annoyance, a vibration level in excess of 72 VdB would be considered significant.

Based on groundborne vibration levels for standard types of construction equipment provided by the FTA, other than pile driving equipment, the use of a vibratory roller would be expected to generate the highest vibration levels. Vibratory rollers typically generate vibration levels of 0.210 in/sec PPV at a distance of 25 feet.<sup>19</sup> Even if such equipment operated as close as 25 feet from existing adjacent residences to the north of the project site, vibration levels would be less than the 0.3 in/sec PPV threshold. In addition, the

<sup>19</sup> FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.

operation of each piece of construction equipment at the project site would not be constant throughout the day, equipment would be operating at different locations within the project site and would not always be operating concurrently. Consequently, vibration levels during the majority of the construction period at the nearest receptors would be much lower. Project construction would be restricted to the hours of the day consistent with the Sacramento Municipal Code and reduce nuisance impacts from both construction noise and vibration by prohibiting such activity during sensitive time periods. Therefore, the Project would have a less-than-significant impact with regard to ground-borne vibration during construction.

### **Operational Vibration**

Once operational, the project would not include any sources of vibration. Therefore, there would be no impact. This is consistent with the determination of the Downtown Ford IS/MND for operational vibration impacts.

### **Exposure to Airport Noise**

The nearest airfield to the project area is the California Highway Patrol Airport located approximately 1.8 miles to the southwest of the project site. As a result, development allowed under the project would not expose people residing or working in the area to excessive noise levels from aircraft, and no impact would occur.

### **Summary**

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant noise or vibration effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford Dealership IS/MND. Further, there are no mitigation measures that were not considered in the Downtown Ford Dealership IS/MND, that would more substantially reduce the noise effects of the proposed project. For these reasons, impacts related to noise and vibration from the proposed project would not require the preparation of a subsequent EIR or IS/MND, and impacts are considered less than significant.

## **XV. Public Services**

The Public Services section of the Downtown Ford IS/MND described existing public services for the project site and evaluated potential impacts of the project with respect to public resource use and available service for the project area. This analysis determined that the anticipated development at the project site would result in less-than-significant impacts to public services for police protection, fire protection, schools, and maintenance

of public facilities. In addition, the applicant would be required to pay all applicable fees including the South Natomas community Infrastructure Fund.

Police protection services to the project site are provided by the Sacramento City Police Department (SPD). The project area is serviced by the Police Facility operating at 300 Richards Boulevard, approximately 2 miles southeast of the project site. In addition to the SPD, the Sacramento County Sheriff's Department, California Highway Patrol (CHP), UC Davis Police Department, and the Regional Transit Police Department aid the SPD to provide protection for the City. This remains consistent with the police protection services analyzed in the Downtown Ford IS/MND.

Fire protection and emergency medical services to the project area are provided by the Sacramento Fire Department (SFD). First-response service is provided by the following stations, which remains consistent with the fire protection services analyzed in the Downtown Ford IS/MND:

- Station 15, located at 1640 West El Camino Avenue, approximately 1.6 miles west of the project site;
- Station 43, located at 4201 El Centro Road, approximately 2.5 miles northwest of the project site;
- Station 14, located at 1314 North C Street, approximately 3 miles southeast of the project site.

No additional demand for police protection, fire protection, schools or maintenance of public facilities were expected to occur from the demand anticipated in the Downtown Ford IS/MND. Therefore, the demand for police and fire protection services would be the same as, and potentially less than, the demand anticipated and analyzed in the Downtown Ford IS/MND.

The proposed project would be entirely comprised of commercial uses, similar to the uses anticipated on this site in the Downtown Ford IS/MND. The proposed project would not alter the impacts to public services disclosed in the analysis presented in the IS/MND, because the proposed use of the project site would be entirely commercial and related uses. Without any residential uses, the proposed project would not require school or library services, because the project would not contribute to the demand for these services. Further, without a residential component to the proposed project, it is not anticipated that there would be a substantial increase in demand for police or fire protection services beyond what was already anticipated in the 2035 General Plan and analyzed in the Downtown Ford IS/MND.

The changes of the proposed project, relative to the anticipated development of the project site analyzed in the Downtown Ford IS/MND, would not alter the impacts to public services relative to those discussed in the Initial Study, as no additional demand for these services would be created. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Initial, result in new

significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND. Further, there are no mitigation measures that were not considered in the Downtown Ford IS/MND, that would more substantially reduce the potential effects of the proposed project on public services. For these reasons, impacts related to public services from the proposed project would not require the preparation of a subsequent IS/MND or EIR.

## XVI. Recreation

The Recreation section of the Downtown Ford IS/MND noted that the project site is located on vacant land in the SNCP area of Sacramento and has been identified for urbanized land uses as part of a mixed-use commercial area that does not include residential or recreational uses. In addition, the Downtown Ford IS/MND evaluated potential impacts of the project with respect to recreational uses and access to recreational uses for the project area. This analysis determined that the project would not introduce a new population because no residential uses were proposed; therefore, the project was not anticipated to result in increased use of existing parks and recreational facilities such that substantial physical deterioration would occur or be accelerated or require the construction of new recreational facilities or expansion of existing recreational facilities. Therefore, the anticipated development at the project site would result in less-than-significant impacts related to recreation.

With anticipated demand for recreational facilities being less than the demand assumed in the buildout of the General Plan, or previously analyzed in the Downtown Ford IS/MND the development of the proposed project would not warrant changes to the recreation analysis or conclusions reached in the IS/MND.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the Downtown Ford IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND. Further, there are no mitigation measures that were not considered in the Downtown Ford IS/MND, that would more substantially reduce the potential effects of the proposed project on recreational uses. For these reasons, impacts related to recreation from the proposed project would not require the preparation of a subsequent EIR or IS/MND, and impacts are considered less than significant.

## XVII. Transportation

### **Transportation Setting**

The components and operational details of the transportation system near the proposed project are described below.

#### ***Existing Roadways***

##### **West El Camino Avenue**

El Camino Avenue is an east-west arterial roadway, extending from El Centro Road to the west to Fair Oaks Boulevard to the east. It accommodates two to four through lanes. In the project vicinity, it is known as West El Camino Avenue and has two through lanes in each direction. To the west, it provides access to I-80 via a full interchange immediately west of the project site. To the east, it provides access to I-5 via a partial interchange (northbound exit, southbound entrance) about 1.0 miles east of the project site. West El Camino Avenue has signalized intersections with the I-80 ramps, Orchard Lane, West River Drive/North Cove Drive, and Gateway Oaks Drive.

##### **El Centro Road**

El Centro Road is a two- to four-lane north-south arterial roadway at the western terminus of West El Camino Avenue. To the south, it terminates at a cul-de-sac at I-80. To the north, it extends north of Del Paso Road, and becomes Bayou Way as it curves to the west to parallel I-5. The intersection of El Centro Road and West El Camino Avenue is controlled by stop-signs on the westbound and northbound approaches.

##### **Orchard Lane**

Orchard Lane is a two-lane north-south minor collector that begins at Garden Highway to the south. As part of ongoing construction associated with adjacent development projects, it has recently been completed to a roundabout approximately 700 feet north of West El Camino Avenue. Orchard Lane intersects with Lone Silo Avenue and a driveway to The Core Natomas multifamily development.

##### **Orchard Court**

Orchard Court is a local street under construction extending approximately 570 feet west from Orchard Lane to a cul-de-sac. Orchard Court is immediately north of the project site and separates the project site from the Core Natomas multi-family development.

##### **Lone Silo Avenue**

Lone Silo Avenue is a local residential street that extends easterly from the roundabout at Orchard Lane for about 600 feet to a T-intersection at Bathford Street within The Cove development.

##### **West River Drive**

West River Drive is a two-lane local street that begins at West El Camino Avenue. It proceeds southerly for about 0.2 miles, and then turns westerly and crosses Orchard

Lane. West River Drive continues westerly through a residential area to its terminus at Wheelhouse Avenue.

North of West El Camino Avenue, West River Drive becomes North Cove Drive, a local residential street that extends northerly for about 600 feet to a T-intersection with Endsley Avenue. As part of The Cove development, a traffic signal was recently installed at the intersection of West El Camino Avenue, West River Drive, and North Cove Drive.

### **Unity Park Street**

Unity Park Street is a two-lane local street that begins at West El Camino Avenue. It proceeds southerly for about 0.1 miles to its terminus at Unity Pointe Avenue. At West El Camino Avenue, turning movements are limited to right-in/right-out at a stop-sign controlled intersection.

North of West El Camino Avenue, Unity Park Street will extend northerly as a future street into The Cove. It is referred to as “P” Street in this analysis. At West El Camino Avenue, turning movements will be limited to right-in/right-out at a stop-sign controlled intersection.

### **Gateway Oaks Drive**

Gateway Oaks Drive is a north-south minor collector located about 0.7 miles east of the site. The roadway generally has one travel lane in each direction north of its signalized intersection with West El Camino Avenue, and two travel lanes in each direction to the south. Gateway Oaks Drive serves residential development on its west side and office development on its east side. To the south, it extends to Garden Highway. To the north, it extends to the Natomas Main Drainage Canal.

### ***Existing Pedestrian System***

The pedestrian system in the site vicinity consists of sidewalks on some, but not all, sides of the study area street system.

Adjacent to the project site, sidewalks are provided along the north side of West El Camino Avenue. These sidewalks extend through the I-80 interchange to El Centro Road to the west, and beyond the I-5 interchange to the east. On the south side of West El Camino Avenue, sidewalks begin about 250 feet west of Orchard Lane (along the Arco/AM-PM store) and continue to the east. Marked crosswalks are provided on all legs of the signalized West El Camino Avenue/Orchard Lane intersection.

Sidewalks have recently been constructed along the east side of Orchard Lane north of West El Camino Avenue. Sidewalks along the west side of Orchard Lane north of West El Camino Avenue will be constructed as adjacent development occurs. Similarly, sidewalks will be constructed on both sides of Orchard Court.

Continuous sidewalks are provided on both sides of West River Drive, Gateway Oaks Drive and Unity Park Street. Continuous sidewalks are provided on Orchard Lane south of West El Camino Avenue. On El Centro Road in the site vicinity, sidewalks are provided

on the east side of the roadway from the I-80 cul-de-sac to about 600 feet north of West El Camino Avenue.

### ***Existing Bicycle System***

On-street bikeways currently exist on the following roadway segments:

- West El Camino Avenue from El Centro Road to the I-5 interchange;
- Orchard Lane from Lone Silo Avenue to Garden Highway (recently constructed north of West El Camino Avenue);
- Gateway Oaks Drive from the Natomas Main Drainage Canal to Garden Highway;
- Garden Highway from Orchard Lane to Gateway Oaks Drive;
- Barandas Drive from Orchard Lane to West River Drive; and
- West River Drive from Orchard Lane to west of Barandas Drive.

Off-street bikeways in the project vicinity currently include:

- An east-west path from Orchard Lane to West River Drive, extending approximately from Barandas Drive to West River Drive; and
- A north-south path on the east side of the Natomas Main Drainage Canal. To the south, it continues to Garden Highway and Natomas Oaks Park. To the north, it crosses I-80 into North Natomas.

### ***Existing Transit System***

Regional Transit (RT) service in the site vicinity is limited to routes to the east of the project site, near I-5. The closest bus route is Route 88 (West El Camino), which operates along West El Camino Avenue, Gateway Oaks Drive, and Garden Highway. To the east Route 88 extends along West El Camino Avenue to the Arden/Del Paso light rail station. To the south Route 88 extends along Gateway Oaks Drive, Garden Highway, and I-5 to Downtown Sacramento. Route 88 provides weekday, Saturday, and Sunday service.

### ***Intersections and Roadway Segments***

The City conducted a transportation analysis, prepared by DKS, which measured existing intersection and roadway segment operations within the project vicinity (see **Attachment 3**). The DKS study analyzed eight intersections near the project site, including the following:

1. West El Camino Avenue & I-80 Westbound Ramps;
2. West El Camino Avenue & I-80 Eastbound Ramps;
3. West El Camino Avenue & Orchard Lane;
4. West El Camino Avenue & West River Drive / North Cove Drive;

5. West El Camino Avenue & Unity Park Street / “P” Street;
6. West El Camino Avenue & Gateway Oaks Drive;
7. Orchard Court & Orchard Lane (under construction); and
8. Lone Silo Avenue & Orchard Lane (under construction).

Peak period intersection turning movement counts were conducted for the AM weekday peak period (7:00 to 9:00 AM) and the PM weekday peak period (4:00 to 6:00 PM) on Thursday, February 6, 2020 at intersections 1 and 2 (freeway ramps). These counts were conducted on behalf of the City as part of the interchange monitoring program.

Due to the economic and travel disruptions of the COVID-19 pandemic, it was not feasible to conduct traffic counts at the other intersections. Earlier counts for intersections 1 through 6 conducted on Thursday, November 16, 2017, were available.

Estimates of intersection turning movement traffic volumes on Tuesday through Thursday February 2020 weekdays were obtained from StreetLight for intersections 1 through 6. StreetLight uses anonymous cell phone traveler data and proprietary algorithms to estimate hourly traffic volumes.

The 2017 counts, 2020 counts, and StreetLight estimates were evaluated and compared:

- At intersections 1 and 2, the AM peak hour counts from 2020 were 2 to 8 percent higher than 2017. They were 0 to 2 percent higher in the PM peak hour.
- The StreetLight estimates included volumes on the north legs of intersections 3 and 4 associated with Cove residents and construction traffic.
- Compared to 2017 data, the StreetLight estimates were generally lower, except at the freeway interchange.

Based upon this comparison, estimated 2020 “existing” traffic volumes were computed as follows:

- At intersections 1 and 2, the 2020 counts were utilized.
- At intersections 3 through 6, the 2017 counts were utilized, and adjusted as follows:
  - At intersections 3 and 4, traffic volumes entering and exiting the north legs were derived from the StreetLight estimates.
  - At intersections 3 through 6, eastbound and westbound volumes were increased based upon the difference between 2017 and 2020 counts west of Orchard Lane. These differences were 108 and 131 vehicles per hour eastbound and westbound, respectively in the AM peak hour. During the PM peak hour, the differences were 9 and 0 vehicles per hour eastbound and westbound, respectively.

**Table 12** shows the analysis results for AM and PM peak hour traffic delays and level of service for study intersections, under existing conditions. As shown in Table 12, all study intersections operate at LOS D or better.

**TABLE 12  
EXISTING INTERSECTION AND OPERATIONS ANALYSIS**

Intersection	AM Peak Hour		PM Peak Hour	
	Delay (Seconds)	LOS	Delay (Seconds)	LOS
1. W. El Camino Ave. & I-80 Westbound Ramps	21.2	C	12.9	B
2. W. El Camino Ave. & I-80 Eastbound Ramps	39.1	D	35.0	D
3. W. El Camino Ave. & Orchard Lane	52.4	D	40.9	D
4. W. El Camino Ave. & W. river Dr. / N. Cove Dr.	37.2	D	39.7	D
5. W. El Camino Ave. & Unity Park St. (avg)	0.1	A	0.1	A
- Northbound	15.5	C	12.3	B
6. W. El Camino Ave. & Gateway Oaks Dr.	37.5	D	32.1	C

SOURCE: DKS Associates, 2020

## Baseline Conditions

Immediately adjacent to the project, the following land uses affect circulation and access planning:

- The Cove is a residential development east of Orchard Lane that is currently under construction and partially occupied. At buildout, it will consist of 435 single-family and 156 townhouse dwelling units. The Cove has access via intersections 4, 5, and 8.
- The Core Natomas is a 300-dwelling unit apartment complex north of Orchard Court. It is currently under construction. It will have access via intersection 8 and the cul-de-sac at the west end of Orchard Court.
- A vacant parcel is located west of the Marketplace project. It will have shared access with the Marketplace at Drive 3, and potentially via the cul-de-sac. A 120-room hotel has been assumed as future development on this parcel.

Vehicular trip generation of the baseline projects has been estimated using ITE Trip Generation, Tenth Edition. **Table 13** summarizes the estimated baseline project trip generation for daily, AM peak hour, and PM peak hour conditions.

**TABLE 13  
BASELINE PROJECT TRIP GENERATION**

Property	Component	Trip Generation						
		Daily	AM Peak Hour			PM Peak Hour		
			Enter	Exit	Total	Enter	Exit	Total
The Core Natomas	Apartments	2,227	31	104	135	99	58	157
The Cove	Single-Family	4,021	79	235	314	263	154	417
	Townhouses	1,139	17	56	73	55	33	88
	Total	5,160	86	291	387	318	187	505
Vacant Property	Hotel	1,468	46	34	80	43	44	87

SOURCE: ITE Trip Generation, Tenth Edition, 2017 as updated; DKS Associates, 2020.

Baseline traffic volumes were calculated by adding the trips associated with the baseline projects (The Cove, The Core Natomas, and hotel) to existing traffic volumes. To address the construction traffic and partial occupancy of the Cove in the existing traffic counts, all traffic entering and exiting the north legs of intersections 3 and 4 was removed from the study area intersections before adding the trips of the baseline projects.

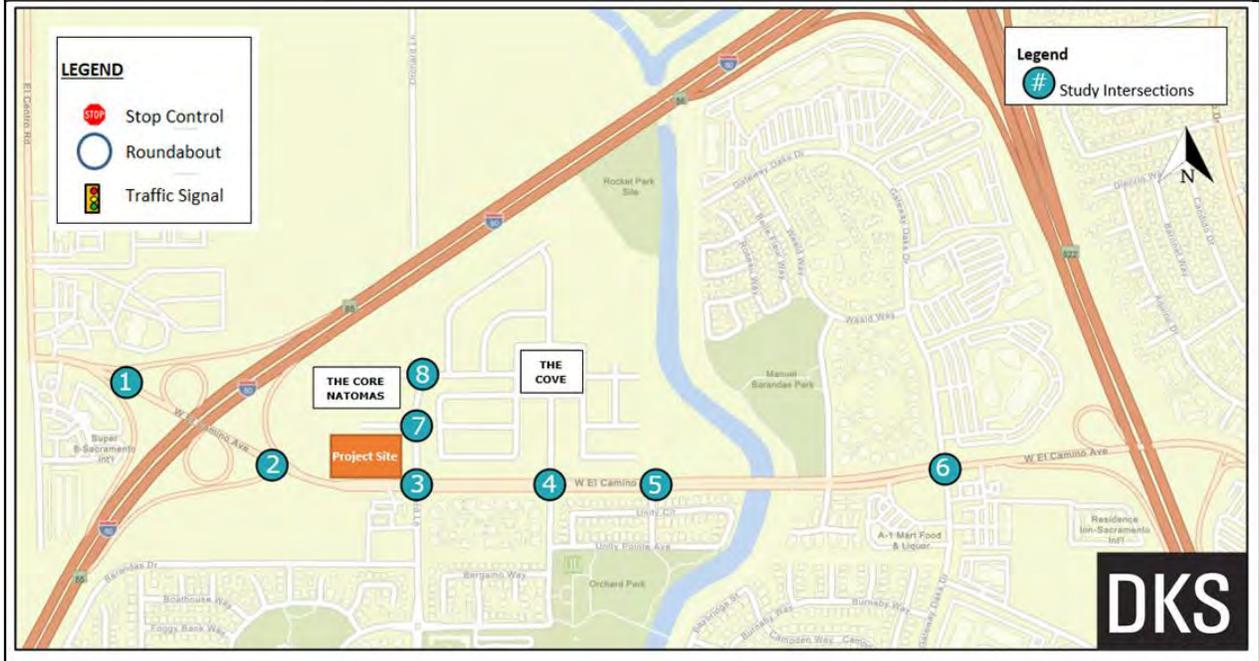
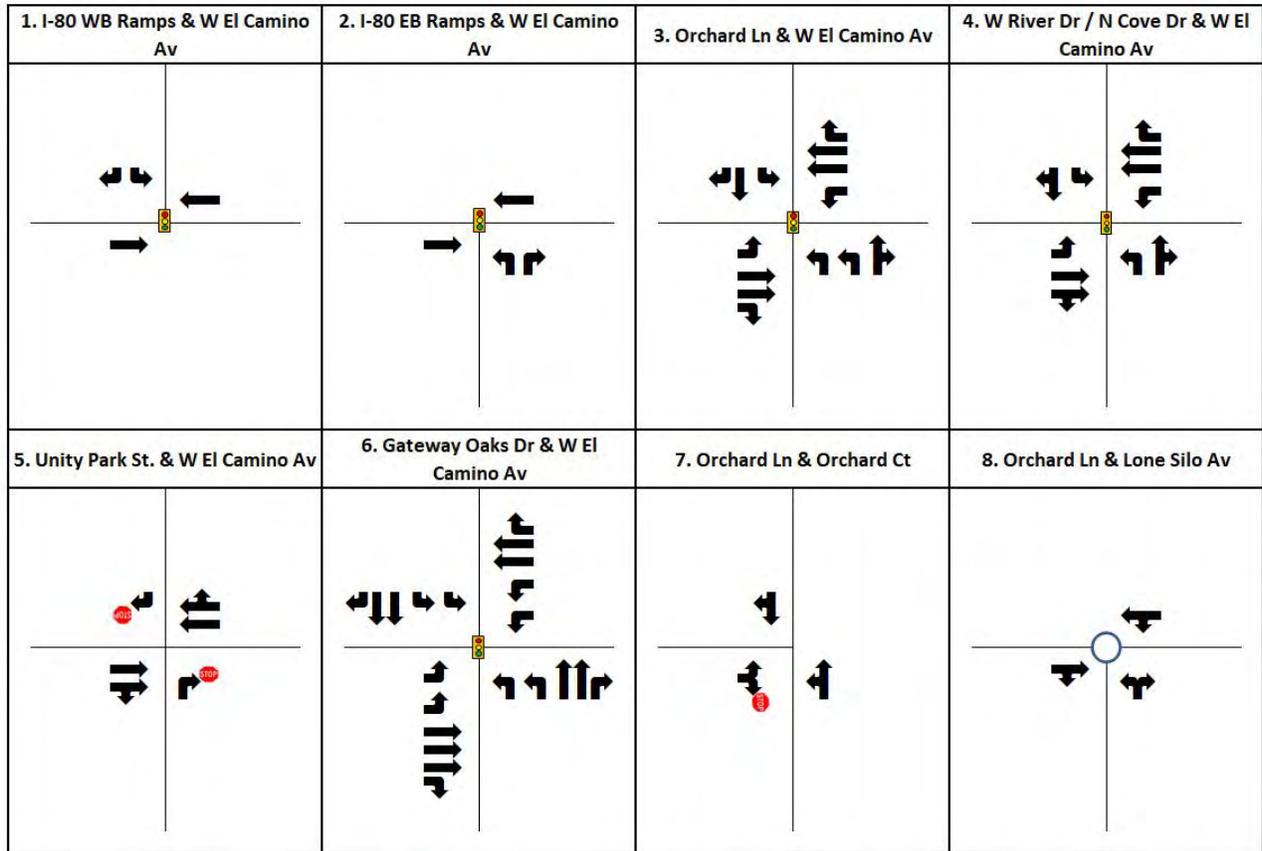
**Figures 15 and 16** illustrates the baseline intersection and lane configuration and peak hour traffic volumes used in the analysis potential impacts from the proposed project.

Baseline condition intersection analysis results are summarized in **Table 14**. As shown in Table 14, all intersections operate at an acceptable LOS D or better.

## Project Travel Characteristics

### *Trip Generation*

The proposed project would be anticipated to generate a combination of single-use trips, internal trips, driveway trips, pass-by trips, and new external trips. **Table 15** shows the anticipated single-use trip generation for the proposed project. **Table 16** summarizes the trip generation estimates for the proposed project. As shown in Table 15, the project is estimated to generate 2,500 new external daily trips, 307 during the AM peak hour, and 199 during the PM peak hour. Additional trip generation information is included in the DKS report in Attachment 3.



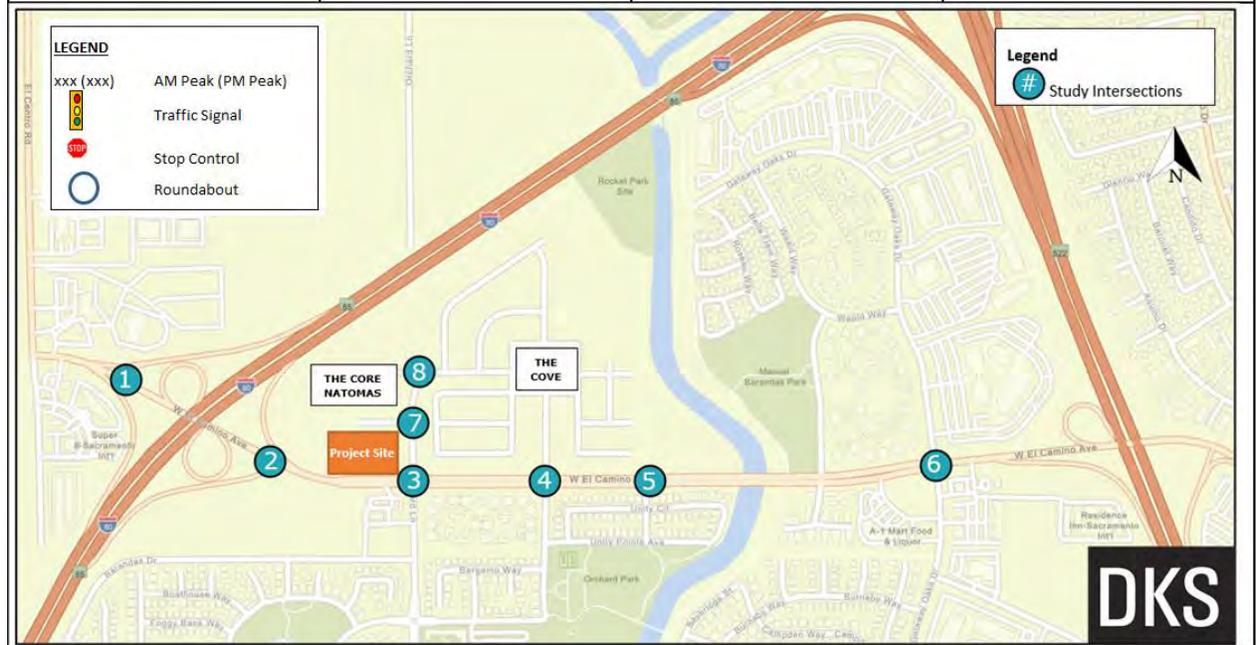
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SOURCE: DKS, 2020

River Oaks Marketplace

**Figure 15**  
Baseline Intersection Lane Configuration

<p><b>1. I-80 WB Ramps &amp; W El Camino Av</b></p> <p>AM Peak (PM Peak)</p> <p>RT 96 (152) LT 725 (442)</p> <p>RT 497 (444) TH 299 (928)</p> <p>453 (268) TH 559 (174) RT</p>	<p><b>2. I-80 EB Ramps &amp; W El Camino Av</b></p> <p>AM Peak (PM Peak)</p> <p>RT 744 (548) TH 635 (734)</p> <p>1059 (637) TH 172 (80) RT</p> <p>LT 117 (646) RT 393 (763)</p>	<p><b>3. Orchard Ln &amp; W El Camino Av</b></p> <p>AM Peak (PM Peak)</p> <p>RT 175 (90) TH 7 (4) LT 49 (53)</p> <p>RT 35 (64) TH 769 (1045) LT 57 (114)</p> <p>57 (165) LT 1321 (949) TH 71 (285) RT</p> <p>LT 435 (220) TH 4 (5) RT 122 (97)</p>	<p><b>4. W River Dr / N Cove Dr &amp; W El Camino Av</b></p> <p>AM Peak (PM Peak)</p> <p>RT 47 (22) TH 3 (2) LT 122 (105)</p> <p>RT 25 (60) TH 801 (1171) LT 195 (62)</p> <p>15 (73) LT 308 (1021) TH 35 (28) RT</p> <p>LT 13 (7) TH 0 (3) RT 47 (32)</p>
<p><b>5. Unity Park St. &amp; W El Camino Av</b></p> <p>AM Peak (PM Peak)</p> <p>RT 26 (13)</p> <p>RT 36 (89) TH 865 (1314)</p> <p>632 (1149) TH 4 (10) RT</p> <p>RT 17 (14)</p>	<p><b>6. Gateway Oaks Dr &amp; W El Camino Av</b></p> <p>AM Peak (PM Peak)</p> <p>RT 42 (280) TH 34 (117) LT 130 (450)</p> <p>RT 574 (102) TH 568 (584) LT 310 (212)</p> <p>308 (71) LT 765 (846) TH 437 (215) RT</p> <p>LT 204 (372) TH 117 (60) RT 127 (371)</p>	<p><b>7. Orchard Ln &amp; Orchard Ct</b></p> <p>AM Peak (PM Peak)</p> <p>RT 0 (0) TH 171 (89)</p> <p>0 (0) LT 60 (59) RT</p> <p>LT 54 (68) TH 58 (239)</p>	<p><b>8. Orchard Ln &amp; Lone Silo Av</b></p> <p>AM Peak (PM Peak)</p> <p>TH 0 (0) LT 93 (45)</p> <p>0 (0) TH 78 (44) RT</p> <p>LT 23 (74) RT 35 (165)</p>



Not to Scale

SOURCE: DKS, 2020

River Oaks Marketplace

**Figure 16**  
Baseline 2020 AM and PM Peak Hour Traffic Volumes



**TABLE 14**  
**BASELINE INTERSECTION OPERATION ANALYSIS**

Intersection	AM Peak Hour		PM Peak Hour	
	Delay (Seconds)	LOS	Delay (Seconds)	LOS
1. W. El Camino Ave. & I-80 Westbound Ramps	21.6	C	18.0	B
2. W. El Camino Ave. & I-80 Eastbound Ramps	43.9	D	42.2	D
3. W. El Camino Ave. & Orchard Lane	48.2	D	49.5	D
4. W. El Camino Ave. & W. River Dr. / N. Cove Dr.	38.9	D	38.2	D
5. W. El Camino Ave. & Unity Park St. (avg)	0.2	A	0.1	A
- Northbound	16.9	C	13.1	B
- Southbound	11.8	B	14.8	B
6. W. El Camino Ave. & Gateway Oaks Dr.	36.9	D	34.1	C
7. Orchard Ct. & Orchard Ln. (avg)	2.9	A	2.3	A
- Northbound Left	7.7	A	7.5	A
- Eastbound	9.4	A	8.7	A
8. Lone Silo Ave. & Orchard Ln.	3.3	A	3.8	A

SOURCE: DKS Associates, 2020

**TABLE 15**  
**SINGLE USE TRIP GENERATION**

Component	Trip Generation						
	Daily	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
7-Eleven	4,253	234	233	467	195	194	389
McDonalds	2,119	92	89	181	76	71	147
Dutch Bros.	1,793	108	107	215	81	81	162
Total	8,165	434	429	863	352	346	698

SOURCE: ITE Trip Generation, Tenth Edition, 2017 as updated; DKS Associates, 2020.

**TABLE 16**  
**VEHICULAR TRIP GENERATION ESTIMATES**

Trip Type	Trip Generation						
	Daily	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Single Use Trips	8,165	434	429	863	352	346	698
Internal Trips	-3,181	-79	-70	-149	-156	-180	-335
Driveway Trips	5,731	377	381	758	235	205	441
Pass-by Trips	-3,231	-224	-227	-451	-130	-112	-242
New External Trips	2,500	153	154	307	106	93	199

SOURCE: ITE Trip Generation, Tenth Edition, 2017; ITE Trip Generation Handbook, Second Edition, 2004; ITE Trip Generation Handbook, Third Edition, 2014; and DKS Associates, 2020.

### ***Trip Distribution***

The distribution of trips associated with the proposed project was derived from the regional SACSIM travel model, observations of travel patterns near the site, and knowledge of the proposed access locations associated with the site. Trip distribution varies by time of day and direction of travel. **Figure 17** illustrates the trip distribution of the new external trips on the study area network.

### **Baseline Plus Project Traffic Conditions**

Baseline-plus-project intersection geometry is illustrated in **Figure 18**. Baseline-plus-project traffic volumes were calculated by adding the trips associated with the project to baseline traffic volumes. Adjustments were made to address internal trips between the project and The Core Natomas, and vehicular trips between the project and The Cove. **Figure 19** illustrates the baseline-plus-project peak hour traffic volumes used in the DKS analysis. Baseline plus project conditions intersection analysis results are summarized in **Table 17**. As shown in Table 17, all intersections operate at an acceptable LOS D or better, under baseline-plus-project conditions.

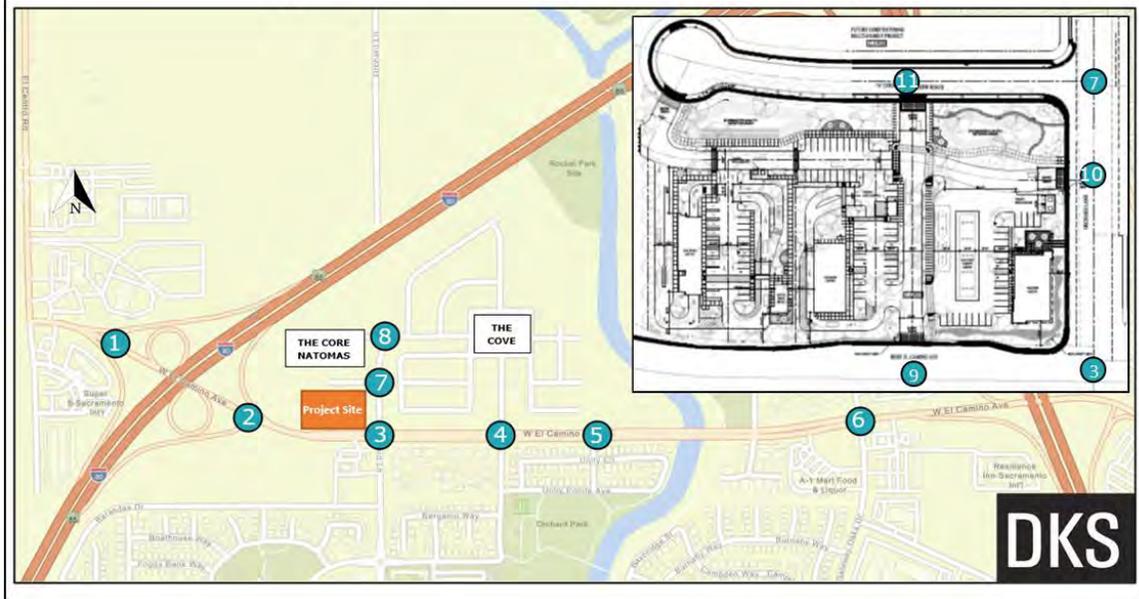
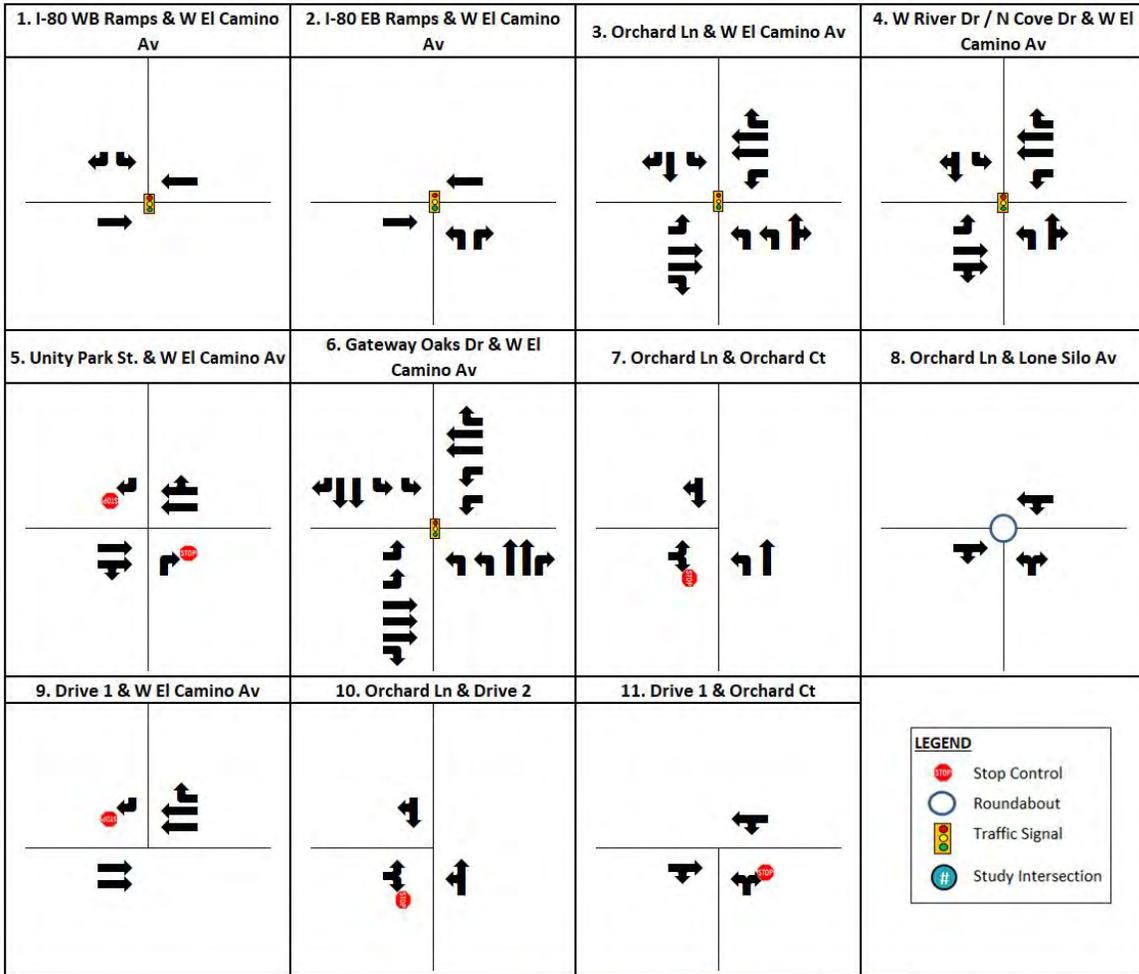


SOURCE: DKS, 2020

River Oaks Marketplace

**Figure 17**  
Project Trip Distribution





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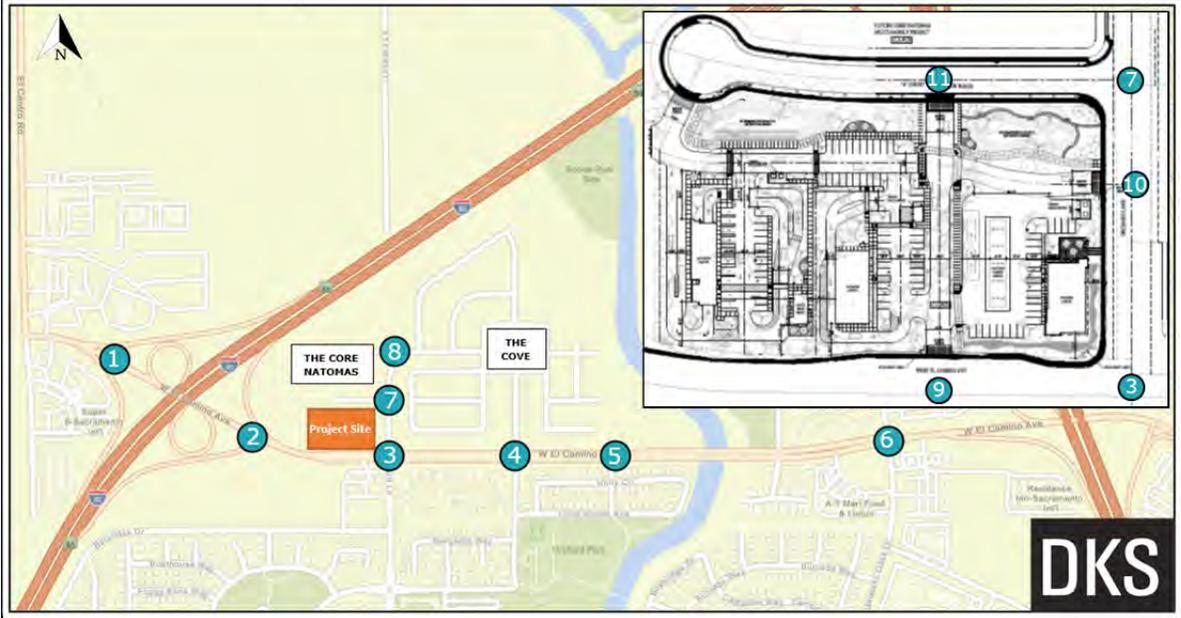
SOURCE: DKS, 2020

River Oaks Marketplace

**Figure 18**  
Baseline Plus Project Intersection Lane Configuration



1. I-80 WB Ramps & W El Camino Av	2. I-80 EB Ramps & W El Camino Av	3. Orchard Ln & W El Camino Av	4. W River Dr / N Cove Dr & W El Camino Av
<p>RT 96 (152) LT 765 (454)</p> <p>TH 543 (452) TH 311 (932)</p> <hr/> <p>468 (294) TH 559 (174) RT</p>	<p>RT 805 (569) TH 695 (747)</p> <p>LT 1115 (674) TH 172 (80) RT</p> <p>117 (646) LT 429 (759) RT</p>	<p>RT 170 (77) TH 18 (6) LT 161 (126)</p> <p>RT 46 (47) TH 806 (1074) LT 57 (114)</p> <hr/> <p>249 (256) LT 1222 (893) TH 71 (285) RT</p> <p>438 (221) LT 9 (5) TH 122 (97) RT</p>	<p>RT 46 (22) TH 3 (2) LT 121 (104)</p> <p>RT 25 (60) TH 850 (1183) LT 195 (62)</p> <hr/> <p>15 (73) LT 1320 (1047) TH 35 (27) RT</p> <p>13 (6) LT 0 (3) TH 47 (32) RT</p>
5. Unity Park St. & W El Camino Av	6. Gateway Oaks Dr & W El Camino Av	7. Orchard Ln & Orchard Ct	8. Orchard Ln & Lone Silo Av
<p>RT 26 (13)</p> <p>RT 36 (89) TH 914 (1326)</p> <hr/> <p>1643 (1174) TH 4 (10) RT</p> <p>RT 17 (14)</p>	<p>RT 44 (288) TH 34 (117) LT 130 (450)</p> <p>RT 574 (102) TH 602 (575) LT 310 (212)</p> <hr/> <p>311 (73) LT 767 (861) TH 445 (223) RT</p> <p>218 (385) LT 117 (60) TH 127 (371) RT</p>	<p>RT 2 (2) TH 163 (64)</p> <hr/> <p>0 (1) LT</p> <p>58 (51) RT</p> <p>62 (59) LT 57 (197) RT</p>	<p>TH 0 (0) LT 94 (46)</p> <hr/> <p>0 (0) TH 71 (20) RT</p> <p>22 (32) LT 35 (166) RT</p>
9. Drive 1 & W El Camino Av	10. Orchard Ln & Drive 2	11. Drive 1 & Orchard Ct	<p><b>LEGEND</b></p> <p>xxx (xxx) AM Peak (PM Peak)</p> <p>Traffic Signal</p> <p>Stop Control</p> <p>Roundabout</p> <p>Study Intersection</p>
<p>RT 221 (91)</p> <p>RT 234 (138) TH 1279 (1217)</p> <hr/> <p>1543 (1434) TH</p>	<p>RT 16 (6) TH 204 (108)</p> <hr/> <p>8 (11) LT</p> <p>144 (98) RT</p> <p>109 (80) LT 111 (244) RT</p>	<p>TH 60 (57) LT 4 (4)</p> <hr/> <p>54 (47) TH 4 (4) RT</p> <p>2 (2) LT 4 (5) RT</p>	



Not to Scale

SOURCE: DKS, 2020

River Oaks Marketplace

**Figure 19**  
Baseline Plus Project 2020 AM and PM Peak Hour Traffic Volumes



**TABLE 17**  
**BASELINE PLUS PROJECT INTERSECTION OPERATION ANALYSIS**

Intersection	AM Peak Hour		PM Peak Hour	
	Delay (Seconds)	LOS	Delay (Seconds)	LOS
1. W. El Camino Ave. & I-80 Westbound Ramps	23.3	C	18.7	B
2. W. El Camino Ave. & I-80 Eastbound Ramps	54.2	D	42.4	D
3. W. El Camino Ave. & Orchard Lane	49.9	D	42.0	D
4. W. El Camino Ave. & W. River Dr. / N. Cove Dr.	38.1	D	38.2	D
5. W. El Camino Ave. & Unity Park St. (avg)	0.2	A	0.1	A
- Northbound	17.0	C	13.3	B
- Southbound	12.1	B	14.9	B
6. W. El Camino Ave. & Gateway Oaks Dr.	37.0	D	34.4	C
7. Orchard Ct. & Orchard Ln. (avg)	3.0	A	2.4	A
- Northbound Left	7.7	A	7.4	A
- Eastbound	9.4	A	8.9	A
8. Lone Silo Ave. & Orchard Ln.	3.2	A	3.6	A
9. W. El Camino Ave. & Drive 1 (avg)	1.5	A	0.5	A
- Southbound Right	22.9	C	15.4	C
10. Drive 2 & Orchard Ln. (avg)	4.2	A	3.1	A
- Northbound Left	7.9	A	7.6	A
- Eastbound	10.6	B	9.8	A
11. Orchard Ct. & Drive 1 (avg)	0.7	A	0.8	A
- Northbound	8.8	A	8.7	A
- Westbound left	7.3	A	7.3	A

SOURCE: DKS Associates, 2020

## Transportation Impacts Discussion

### *Intersections and Roadway Segments*

The Downtown Ford IS/MND concluded, based on the Traffic Impact Study prepared by Fehr & Peers in July of 2001 for Park El Camino project (Park El Camino Project Traffic Study),<sup>20</sup> that intersection impacts from the Downtown Ford Auto Dealership project would have a potentially-significant impact related to congestion. The Downtown Ford Auto Dealership project was required, as a condition of approval, to incorporate the same

<sup>20</sup> Fehr & Peers, 2001. Traffic Impact Study, Park El Camino Project at West El Camino Avenue/Orchard Lane. July 2001.

mitigation measures that were identified in the Park El Camino Project Traffic Impact Study, reproduced as Mitigation Measure 3, in the Downtown Ford IS/MND. Mitigation Measure 3 included the requirement for contribution of fair share fees by the project developer towards the installation of traffic signals at the intersection West El Camino Avenue and I-80 eastbound ramp and West El Camino Avenue and I-80 westbound ramp prior to issuance of building permits. With implementation of Mitigation Measure 3, the City determined that impacts related to congestion would be less than significant with mitigation incorporated. Since completion of the Downtown Ford IS/MND, traffic signals have been constructed at the intersections identified in Mitigation Measure 3. Thus, Mitigation Measure 3 is no longer relevant to the proposed project.

As shown above, the proposed project would increase traffic volume and delay at study area intersections under the baseline plus project scenario, but none of these increases would worsen the baseline LOS at any intersection. As reflected in Table 17, the resultant operating conditions at all intersections would continue to function at an acceptable LOS D or better. Therefore, this impact would be considered less than significant with no mitigation required.

### ***Transit***

The Downtown Ford IS/MND concluded that the Downtown Ford Auto Dealership project would not alter existing transit facilities or conflict with adopted policies or plan regarding alternative transportation. The City determined that the Downtown Ford Auto Dealership project would have a less-than-significant impact related to transit.

The proposed project would not adversely affect public transit operations. As with the Downtown Ford Auto Dealership project, the proposed project would not modify or impede any existing or planned transit facilities/routes. For this reason, the proposed project would have a less-than-significant impact, related to transit, and no mitigation is required.

### ***Pedestrian and Bicycle Facilities***

The City determined in the Downtown Ford IS/MND, that the project would increase potential bicycle/pedestrian or bicycle/motor vehicle conflicts. However, the frontage improvements along the project site would include sidewalks to appropriate standards intended to maintain pedestrian and bicycle safety. The City also determined that the project would not alter the location or quality of existing pedestrian and bicycle facilities, concluding that the project would have a less-than-significant impact related to pedestrian access.

The proposed project would not adversely affect existing or planned pedestrian facilities. The project will include sidewalks along the project frontage and pedestrian pathways providing access through the project site and to the planned uses within the project site. The proposed project would maintain and improve existing pedestrian and bicycle facilities, while adding additional pedestrian facilities to the City's transportation network.

Therefore, the proposed project would have a less-than-significant impact on pedestrian and bicycle circulation and no mitigation is required.

### ***Construction Traffic***

The Downtown Ford IS/MND did not include a discussion of impacts related to construction traffic. However, the proposed project could cause potentially significant impacts due to construction-related activities. The City Code (City Code 12.20.030) requires that a construction traffic control plan be prepared and approved prior to the beginning of project construction, to the satisfaction of the City Traffic Engineer and subject to review by all affected agencies. All work performed during construction must conform to the conditions and requirements of the approved plan. The plan is required to ensure that safe and efficient movement of traffic through the construction work zone(s) is maintained. At a minimum, the plan is required to include the following:

- Time and day of street closures
- Proper advance warning and posted signage regarding street closures
- Provision of driveway access plan to ensure safe vehicular, pedestrian, and bicycle movements
- Safe and efficient access routes for emergency vehicles
- Provisions for pedestrian safety
- Use of manual traffic control when necessary
- Number of anticipated truck trips, and time of day of arrival and departure of trucks
- Provision of a truck circulation pattern and staging area with a limitation on the number of trucks that can be waiting and any limitations on the size and type of trucks appropriate for the surrounding transportation network
- The plan must be available at the site for inspection by the City representative during all work. With the implementation of the traffic control plan, local roadways and freeway facilities will continue to operate at acceptable operating conditions and the impact of the project would be less than significant.

Conformance to City Code 12.20.030 would ensure the safe movement of vehicular, pedestrian, and bicycle traffic through the construction work zone of the proposed project. This impact would be less than significant.

### **Vehicle Miles Traveled**

Senate Bill 743 (SB 743), codified in Public Resources Code section 21099, required changes to the CEQA Guidelines on the analysis of transportation impacts. In January 2019, the Natural Resources Agency updated the CEQA Guidelines in response to SB 743, to identify vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. Further, the Natural Resources Agency declared that a project's

effect on automobile delay shall not constitute a significant environmental impact. As of July 1, 2020, these provisions apply to projects statewide. The majority of CEQA documents approved prior to July 1, 2020 do not include analysis of VMT as it was not a required method of analyzing transportation impacts. Thus, the Downtown Ford IS/MND did not include analysis of VMT impacts from the Downtown Ford Auto Dealership project. The proposed uses in the River Oaks Marketplace project would each generate VMT impacts, which are discussed below.

The most authoritative guidance on implementing the SB 743 changes comes from the Governor's Office of Planning and Research (OPR), which worked with the Natural Resources Agency to update the CEQA Guidelines. In December 2018, OPR published technical guidance recommending approaches to analyzing transportation and land use projects. Because new retail development often redistributes trips rather than creating new travel demand, the OPR guidance recommends that lead agencies analyze the net change in VMT to indicate the transportation impact of retail projects.<sup>21</sup>

The potential for VMT impacts, according to this approach, hinges on whether the project can be considered local-serving or regional. By adding retail opportunities within existing neighborhoods, local-serving retail projects can shorten trips and reduce overall VMT.

In contrast, regional destination retail projects would draw customers from larger trade areas, potentially substituting for shorter trips and increasing VMT. The OPR guidance suggests that any retail projects including stores larger than 50,000 square feet might be considered regional serving retail.

### ***Retail Center Characteristics***

The classification of commercial centers (retail centers, shopping centers) is complicated by the many possible combinations of uses within any center. However, for purposes of managing and leasing space, the shopping center industry has developed a classification scheme with ten categories. Of the ten categories, the "Strip / Convenience" Center and the "Neighborhood Center" can usually be considered as local-serving retail. These centers, which typically range in size up to 125,000 square feet, are occupied by uses oriented to a trade area of three miles or less. The typical uses are ubiquitous throughout the area, with many nearby competitors, as well as multiple locations of specific tenants. Neighborhood centers require the support of 6,000 to 8,000 households in a one- to two-mile radius.<sup>22</sup>

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<sup>21</sup> Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA. As cited in DKS, 2020.

<sup>22</sup> A Primer on Retail Types and Urban Centers, Steuteville, Congress for the New Urbanism, Public Square, September 1, 2007.

### ***Project Environs and Characteristics***

As discussed in the description of VMT screening of retail projects, a retail project may result in a reduction of VMT if it is “local-serving retail”. The following characteristics of the environs and of the project itself were evaluated.

#### **Project Components**

The proposed project components are retail/service uses that are common throughout the South Natomas area. They are intended to serve the local area and will compete with nearby businesses. No “unique” or destination-retail uses are proposed which would be likely to attract a substantial number of long-distance trips.

- Convenience Store – There are competing convenience stores within the site vicinity, including an AM PM market/fuel station across West El Camino Avenue.
- Restaurants/Coffee Shops – There are over twenty dining establishments within two miles of the site, including coffee shops and fast food restaurants.

#### **Project Travel Patterns**

The earlier transportation analysis provides quantitative estimates of project vehicular trip generation. The project is estimated to generate 8,833 vehicle trips.

- About 36 percent of the trips will be internal trips. These internal trips between uses on the site will replace automobile trips.
- About 36 percent are expected to be pass-by trips. Pass-by trips are vehicle trips that access the project site that are already on the roadway network driving past the site. These linked trips result in minimal changes in VMT.

The project also has good pedestrian access to the adjacent existing and new neighborhoods, which could reduce automobile trips to the site.

### ***Summary of VMT Impacts***

The project is considered to be local-serving retail, which is presumed to have a less-than-significant VMT impact based upon OPR guidance.

### **Conclusion**

The proposed project would not alter the impacts to transportation and circulation relative to those discussed in the Downtown Ford IS/MND. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. In addition, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the IS/MND. Nor is there new information of substantial importance showing (i) that

mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents declined to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the previous IS/MND would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative. For these reasons, impacts related to transportation and circulation from the proposed project would not require the preparation of a subsequent EIR or IS/MND. No new mitigation measures will be required.

## XVIII. Utilities and Service Systems

### **Communication Systems**

The City determined in the Downtown Ford IS/MND that the project site would have a less-than-significant impact on communication systems (e.g., microwave, radar, radio transmissions). No communication system components are located on or adjacent to the project site. Since preparation of the Downtown Ford IS/MND, no communication system components have been constructed on or adjacent to the project site. The proposed project would construct multiple single-story buildings. As with the Downtown Ford Auto Dealership project, the proposed project would not construct buildings of sufficient height to interfere with communication equipment in the greater vicinity. For these reasons, impacts from the proposed project would remain less than significant and no mitigation would be required.

### **Local or Regional Water Supplies**

The City determined in the Downtown Ford IS/MND that the project would have a less-than-significant impact related to water supply. The Downtown Ford Auto Dealership project was anticipated to have a demand of approximately 36,720 gallons per day. The analysis of project impacts to water supply in the Downtown Ford IS/MND was based on the City's 2002-2003 Operational Statistics, which indicated that the City would have adequate water supply to serve the total anticipated demand associated with City buildout.

Since certification of the Downtown Ford IS/MND, the City has adopted the 2035 General Plan and two UWMPs, the most recent 2015 UWMP adopted by the City Council on June 21, 2016.<sup>23</sup> The 2015 UWMP is based on the development assumptions in the 2035 General Plan. The 2015 UWMP concludes that the City would have adequate water supply to serve the total anticipated demand associated with City buildout, even in multiple dry year scenarios, out to 2040. The 2015 UWMP applies to existing zoning on the project site.

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<sup>23</sup> City of Sacramento, 2016. *2015 Urban Water Management Plan*. June 21, 2016.

The proposed project would have a water demand similar to that of the Downtown Ford Auto Dealership project. Therefore, sufficient water supplies are available to the City and for the proposed project, as demonstrated in the UWMP.

The Downtown Ford IS/MND analyzed the water delivery infrastructure in the vicinity of the project site, concluding that the project site would connect to an existing 12-inch water line that runs within Orchard Drive and West El Camino Avenue. The proposed project would access existing water supply infrastructure within Orchard Drive and would not include offsite improvements.

As described above, the proposed project would not increase water demand beyond the amount anticipated in the UWMP or require substantial offsite improvements that would constitute new or more significant impacts. The proposed project would not have more significant effects that were not discussed in the Downtown Ford IS/MND or increase the severity of impacts discussed therein. Further, there are no mitigation measures that were not considered in the Downtown Ford IS/MND, that would more substantially reduce the potential effects of the proposed project on local and regional water supplies. For these reasons, impacts related to water supply from the proposed project would not require the preparation of a subsequent EIR.

## **Local or Regional Water Treatment or Distribution Facilities**

### **Sewer or Septic Tanks**

As described in the Downtown Ford IS/MND, the project site would be served by the Sacramento Regional County Sanitation District (RegionalSan). Development at the project site would be conveyed through existing eight-inch sewer lines located within Orchard Court. The City determined in the Downtown Ford IS/MND that impacts from the project to wastewater treatment and distribution facilities would be less than significant. Wastewater from the Downtown Ford Auto Dealership project would be transmitted to the Sacramento Regional Wastewater Treatment Plant before being released into the Sacramento River. RegionalSan requires a regional connect fee to be paid for users connecting to or expanding the sewer collection systems and the project applicant would pay all required fees to the District. Therefore, the Downtown Ford IS/MND concluded that impacts to wastewater facilities would be considered less than significant.

Anticipated flows from the proposed project would not exceed the capacity of conveyance infrastructure. Required developer financing of fees and infrastructure to provide wastewater collection and treatment to the project site by the RegionalSan and County Sanitation District #1 would ensure that wastewater infrastructure would be adequate to meet project demand. For these reasons, the proposed project would not substantially increase demand for wastewater conveyance beyond the amount anticipated in Downtown Ford IS/MND or require substantial offsite improvements that would constitute new or more significant impacts.

## Storm Water Drainage

The project site is currently vacant and undeveloped. As described in the Initial Study prepared for the Downtown Ford Auto Dealership Project, development proposed in the Initial Study would create impervious surfaces where none currently exist. However, as proposed in the Downtown Ford Auto Dealership Project, runoff from the project site would drain through a water quality detention basin located in the northwest or southwest quadrants of Orchard Lane.

As described in the Project Description, the drainage system for the proposed project would be managed on-site through an internal drainage system that would include storm drains interspersed throughout the project site and two stormwater quality/detention basins, located on the north side of the project site. The proposed stormwater basins would have a joint capacity of approximately 0.51 acre-feet, which would be adequate to accommodate stormwater flows from the project site and anticipated runoff generated by buildout of the adjacent parcel to the west of the project site. Each of the proposed detention basins would drain to an existing 36-inch storm drain main within Orchard Court, which has been constructed to serve the project site and the Core Natomas residential development to the north of the project site.

The proposed project would introduce 2.27 acres of pervious surfaces, which would account for approximately 43.4% of the 5.23-acre project site. However, the project applicant would be required to construct on-site internal drainage infrastructure to City of Sacramento specifications and pay fees associated with the development and maintenance of the existing drainage infrastructure. As with anticipated development for the project site analyzed in the Downtown Ford IS/MND, the proposed project would have a less-than-significant impact on existing drainage facilities and no mitigation would be required.

## Solid Waste Disposal

As described in the Downtown Ford IS/MND, the City provides solid waste and recycling collection and disposal services to the project site. The IS/MND concluded that the Lockwood Landfill has adequate capacity through the next forty years, which is sufficient capacity to serve the project site.

Waste generated by the proposed project would be collected and transported to local landfills by the City and/or private haulers, and either recycled in accordance with City programs and requirements or land filled at Kiefer Landfill or transported and landfilled at the Lockwood Landfill in Sparks, Nevada. Those facilities together currently have approximately 458 million cubic yards in available capacity. Waste from the proposed project would represent a fraction of a percentage of the available capacity from those facilities. Because there would be no need to expand or create new landfill or solid waste management facilities, there would be no related physical environmental effects. Similar to the impacts evaluated in the Initial Study, the proposed project would have a less than significant effect on solid waste disposal.

## Conclusion

The proposed project would not have more significant effects that were not discussed in the Downtown Ford IS/MND or increase the severity of impacts discussed relating to utilities and service systems. There are no mitigation measures that were not considered in the Downtown Ford Auto Dealership Project IS/MND, that would more substantially reduce the potential effects of the proposed project on utilities. For these reasons, impacts related to utilities from the proposed project would not require the preparation of a subsequent EIR or IS/MND.

## XIX. Wildfire

Wildfire was not analyzed in the Downtown Ford IS/MND.

The project site is currently vacant, undeveloped, and does not contain any trees or shrubs. Surrounding land uses include commercial and agriculture. The project site is not located within, or adjacent to, a fire hazard severity zone, as identified by Cal Fire.<sup>24</sup> The construction activities associated with the proposed project include heavy equipment and vehicles that could generate a spark, which could start a fire in an area containing moderate flammable vegetation; however, the project area is not mapped within a Very High Fire Hazard Severity Zone, therefore, wildfire risks introduced by the proposed project would be less than significant. Additionally, the project site would be developed with commercial buildings, which would not increase the risk of wildfire during operation of the proposed project.

Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the project analyzed in the Downtown Ford IS/MND, result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. No new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND. Further, there are no mitigation measures that were not considered in the Downtown Ford IS/MND, that would more substantially reduce the potential effects of the proposed project on recreational uses. For these reasons, impacts related to wildfire from the proposed project would not require the preparation of a subsequent IS/MND or EIR.

## Conclusion

As established in the discussions above regarding the potential effects of the proposed project, substantial changes are not proposed to the project, nor have any substantial

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<sup>24</sup> California Department of Forestry and Fire Protection (CAL FIRE), 2020. California Fire Hazard Severity Zone Map Update Project: <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>. Accessed September 25, 2020.

changes occurred that would require major revisions to the Downtown Ford IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The City does not have any substantial new information, changes, or impacts that would require major revisions to the Downtown Ford IS/MND and no new mitigation measures would be required. In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the Downtown Ford IS/MND, nor is there new information of substantial importance showing (i) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the Downtown Ford IS/MND would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative.

Therefore, the City of Sacramento's Community Development Department has determined that the analyses conducted and the conclusions reached in the Downtown Ford IS/MND remains relevant and valid. As such, based on the record as a whole, there is no substantial evidence to support a fair argument that the proposed project may result in significant environmental impacts not previously studied in the Downtown Ford IS/MND and, accordingly, the project changes would not result in any conditions identified in CEQA Guidelines Section 15162. Thus, a subsequent MND or EIR is not required for the changes to the project. The proposed project would remain subject to all applicable previously required mitigation measures from the Downtown Ford IS/MND.

Based on the above analysis, this Addendum to the previously adopted Downtown Ford IS/MND for the project has been prepared.

Attachments:

- 1) Air Quality Data
- 2) Biological Resources
- 3) Transportation Analysis

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