

City of SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

ENVIRONMENTAL PLANNING
SERVICES

300 Richards Boulevard
Third Floor
Sacramento, CA 95811

MITIGATED NEGATIVE DECLARATION

The City of Sacramento, California, a municipal corporation, does hereby prepare, declare, and publish this Mitigated Negative Declaration for the following described project:

Advanced Health Care of Sacramento (P14-038) - The project is located on approximately 2.06 acres of vacant, private land bordered by Leisure Lane to the north, Expo Parkway to the west and south, and existing development to the east within the City of Sacramento (City) (APN 275-0310-008), Sacramento County.

The project proposes the construction of a single-story, 32,106 square foot surgical and stroke recovery center and short-term skilled nursing facility. The single-story building will cover approximately 0.715 acre of the project site, and approximately 0.41 acre of the site will be landscaped; the remaining areas of the site will either be asphalt concrete on aggregate base (such as the parking areas), hardscape, or concrete paved areas.

Specific project elements include 40 patient rooms, therapy gymnasium, commercial kitchen and scullery, dining rooms, and 64 surface parking spaces (51 standard, 11 compact, and 2 Americans with Disabilities Act [ADA] accessible spaces). The use of ambulances and associated sirens for this facility is not anticipated. The facility would be functional 24-hours a day. Additional features to be added to the project site include fire hydrants an emergency backup generator, and associated infrastructure, including street and intersection improvements, sanitary sewer, storm drain, water, electric, and communication lines.

The Lead Agency is the City of Sacramento. The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that there is no substantial evidence that the project, with mitigation measures as identified in the attached Initial Study, will have a significant effect on the environment. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. An Environmental Impact Report is not required pursuant to the Environmental Quality Act of 1970 (Sections 21000, et seq., Public Resources Code of the State of California).

This Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Sections 15000 et seq. of the California Code of Regulations), the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento, and the Sacramento City Code.

A copy of this document and all supportive documentation may be reviewed or obtained at the City of Sacramento, Community Development Department, 300 Richards Boulevard, 3rd Floor, Sacramento, CA 95811 from 9:00 a.m. to 4:00 p.m. (or 8:00 a.m. to 5:00 p.m. with prior arrangement). The document is also available on the CDD website at: <http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>

Environmental Services Manager, City of Sacramento,
California, a municipal corporation

By: 

Date: 4/21/15

ADVANCED HEALTH CARE OF SACRAMENTO [P14-038]

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR ANTICIPATED SUBSEQUENT PROJECTS UNDER THE 2030 GENERAL PLAN MASTER EIR

This Initial Study has been prepared by the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811, pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 *et seq.*), CEQA Guidelines (Title 14, Section 15000 *et seq.* of the California Code of Regulations) and the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento.

ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into the following sections:

SECTION I - BACKGROUND: Provides summary background information about the project name, location, sponsor, and the date this Initial Study was completed.

SECTION II - PROJECT DESCRIPTION: Includes a detailed description of the proposed project.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION: Reviews proposed project and states whether the project would have additional significant environmental effects (project-specific effects) that were not evaluated in the Master EIR for the 2030 General Plan.

SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Identifies which environmental factors were determined to have additional significant environmental effects.

SECTION V - DETERMINATION: States whether environmental effects associated with development of the proposed project are significant, and what, if any, added environmental documentation may be required.

REFERENCES CITED: Identifies source materials that have been consulted in the preparation of the Initial Study.

SECTION I - BACKGROUND

Project Name and File Number: Advanced Health Care of Sacramento (P14-038)

Project Location: The intersection of Leisure Lane and Expo Parkway (APN 275-0310-008)

Project Applicant: Ms. Monica Salusky
2540 Camino Diablo, Suite 200
Walnut Creek, CA 94597

Project Planner: David Hung

Environmental Planner: Scott Johnson

Environmental Consultant: HELIX Environmental Planning, Inc.

Date Initial Study Completed: January 2015

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 1500 *et seq.*). The Lead Agency is the City of Sacramento.

The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that the proposed project is an anticipated subsequent project identified and described in the 2030 General Plan Master Environmental Impact Report (MEIR) and is consistent with the land use designation and the permissible densities and intensities of use for the project site as set forth in the 2030 General Plan. See CEQA Guidelines Section 15176 (b) and (d).

The City has prepared the attached Initial Study to: (a) review the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the 2030 General Plan MEIR to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)); and, (b) identify any potential new or additional project-specific significant environmental effects that were not analyzed in the Master EIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects to a level of insignificance, if any.

As part of the MEIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the MEIR (CEQA Guidelines Section 15177(d)). The MEIR mitigation measures that are identified as appropriate are set forth in the applicable technical sections below. Policies included in the 2030 General Plan that reduce significant impacts identified in the MEIR are identified and discussed in the MEIR.

This analysis incorporates by reference the general discussion portions of the 2030 General Plan MEIR (CEQA Guidelines Section 15150(a)). The MEIR is available for public review at the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811, and on the City's web site at:

[\[http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports\]](http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports).

The City is currently updating the 2030 General Plan with the 2035 General Plan and associated MEIR. The 2035 General Plan update maintains the overall land use planning and development direction established in the 2030 General Plan. The changes proposed in the 2035 General Plan update do not change the analysis or conclusions made in this Initial Study.

The City is soliciting views of interested persons and agencies on the content of the environmental information presented in this document as of January 23, 2015. Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but no later than the 30-day review period ending February 23, 2015.

Please send written responses to:

Mr. Scott Johnson
Community Development Department
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811
Direct Line: (916) 808-5842
FAX (916) 808-1077
SRJohnson@cityofsacramento.org

SECTION II - PROJECT DESCRIPTION

Introduction

The project proposes to construct a single-story surgical and stroke recovery center and short-term skilled nursing facility on a currently undeveloped lot located in the City of Sacramento (City) (APN 275-0310-008). This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to evaluate the environmental effects of this project and to ensure compliance under the California Environmental Quality Act (CEQA). The City of Sacramento is the lead agency responsible for CEQA compliance.

Project Background

The project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. It was accounted for in the City's 2030 General Plan, and Master Environmental Impact Report (MEIR), and the project is consistent with the General Plan land use designation (Suburban Center); additionally, it would not require any change to the current zoning (C-2-LI, or General Commercial).

The proposed project is located in close proximity to the Johnston Business Park (which includes various industrial and commercial businesses), and two health care facilities to the southeast (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center). The Red Lion Woodlake and Conference Center is located immediately east of the project site, and commercial uses, such as a Costco and other retail stores are located to the southeast and east of the project beyond the conference center. Development of the site as proposed would alter the existing landscape, but the project site has been designated for urban development in the 2030 General Plan and the Planning and Development Code; the proposed development is consistent with these planning designations.

Project Description

As depicted in Figure 1, the proposed project is slated for development on approximately 2.06 acres of vacant, private land bordered by Leisure Lane to the north, Expo Parkway to the west and south, and existing development to the east within the City of Sacramento (City) (APN 275-0310-008). The project proposes the construction of a single-story, 32,106 square foot surgical and stroke recovery center and short-term skilled nursing facility. Refer to Figure 2 for the proposed project site plan. The single-story building will cover approximately 0.715 acre of the project site, and approximately 0.41 acre of the site will be landscaped; the remaining areas of the site will either be asphalt concrete on aggregate base (such as the parking areas), hardscape, or concrete paved areas.

Specific project elements include 40 patient rooms, therapy gymnasium, commercial kitchen and scullery, dining rooms, and 64 surface parking spaces (51 standard, 11 compact, and 2 Americans with Disabilities Act [ADA] accessible spaces). The use of ambulances and associated sirens for this facility is anticipated to be infrequent. The facility would be functional 24-hours a day with an estimated total staff of 17 therapists, eight certified nursing assistants, six dietary staff, three housekeepers, and 10 nurses and administrative staff. Due to the potential overlapping of staff, a maximum of 44 staff could be in the building at a time; however, in general approximately 38 staff would occupy the building at a given time. The proposed project would require a conditional use permit and development standards deviation due to the

existence of an existing private sewer easement located in the southern portion of the property.

Additional features to be added to the project site include three fire hydrants (one that already exists and would be relocated), an emergency backup generator, and associated infrastructure, including street and intersection improvements, sanitary sewer, storm drain, water, electric, and communication lines. Zoning for this parcel is C-2-LI, or general commercial; no change to the zoning for the site is required for the project. Approximately 1,180 cubic yards (CY) of cut and fill (net 0 CY import/export) would be necessary for project construction.

Attachments

Figure 1 – Vicinity Map

Figure 2 – Site Plan

Figure 3 – Noise Abatement Wall

Appendix A – Arborist Report (A Better Tree Service, undated)

Appendix B – Climate Action Plan Consistency Review Checklist (KD Anderson & Associates, 2014)

Appendix C – Jurisdictional Delineation and Special-Status Species Assessment (Gibson & Skordal, 2014)

Appendix D – Cultural Resources Assessment (Peak & Associates, 2014)

Appendix E – Geotechnical Investigation (Raney Geotechnical, 2014)

Appendix F – Environmental Noise Assessment (J.C. Brennan Associates, 2014)

SECTION III – ENVIRONMENTAL CHECKLIST AND DISCUSSION

LAND USE, POPULATION AND HOUSING, AGRICULTURAL RESOURCES, AND ENERGY

Introduction

The California Environmental Quality Act (CEQA) requires the Lead Agency to examine the effects of a project on the physical conditions that exist within the area that would be affected by the project. CEQA also requires a discussion of any inconsistency between the proposed project and applicable general plans and regional plans.

An inconsistency between the proposed project and an adopted plan for land use development in a community would not constitute a physical change in the environment. When a project diverges from an adopted plan, however, it may affect planning in the community regarding infrastructure and services, and the new demands generated by the project may result in later physical changes in response to the project.

In the same manner, the fact that a project brings new people or demand for housing to a community does not, by itself, change the physical conditions. An increase in population may, however, generate changes in retail demand or demand for governmental services, and the demand for housing may generate new activity in residential development. Physical environmental impacts that could result from implementing the proposed project are discussed in the appropriate technical sections.

This section of the initial study identifies the applicable land use designations, plans and policies, and permissible densities and intensities of use, and discusses any inconsistencies between these plans and the proposed project. This section also discusses agricultural resources and energy and the effect of the project on these resources.

Discussion

Land Use

The project site has been designated as Suburban Center in the 2030 General Plan, and is zoned C-2-LI, or General Commercial.

The project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. The proposed project is located in close proximity to the Johnston Business Park (which includes various industrial and commercial businesses), and two health care facilities to the southeast (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center). The Red Lion Woodlake and Conference Center is located immediately east of the project site, and commercial uses, such as a Costco and other retail stores are located to the southeast and east of the project beyond the conference center. Development of the site as proposed would alter the existing landscape, but the project site has been designated for urban development in the 2030 General Plan and the Planning and Development Code, and the proposed development is consistent with these planning designations.

Population and Housing

The 2030 General Plan MEIR identifies, estimates, and evaluates population and housing changes that would be caused by development of the 2030 General Plan that have the potential to cause physical environmental effects (see MEIR, Chapter 5). The 2030 General Plan includes assumptions for the amount of growth that will occur within the Policy Area over the next 25 years. The General Plan assumes the City will grow by approximately 195,000 new residents, 136,000 new jobs, and 97,000 new housing units. The Population, Employment, and Housing analysis in the 2030 General Plan MEIR (Chapter 5) provides a detailed discussion of how the City reached these assumptions and the methodology used to determine a realistic level of growth for the City.

The project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. Surrounding land uses include commercial, light industrial, and hotel land uses. In 2005, the City's average household size was 2.69 persons (MEIR Chapter 5). The project does not propose to add any residents to the city of Sacramento; rather, it proposes to offer employment opportunities and health services to current residents. The project is consistent with the General Plan land use designation (Suburban Center); additionally, it would not require any change to the current zoning (C-2-LI, or General Commercial). Additionally, there are no existing houses on the project site; therefore, people and housing units would not be displaced as a result of project construction and implementation. Impacts due to the development of proposed project related to population and housing would be less than significant.

Agricultural Resources

The MEIR discussed the potential impact of development under the 2030 General Plan on agricultural resources (see MEIR, Chapter 6.2). In addition to evaluating the effect of the general plan on sites within the City, the MEIR noted that, to the extent the 2030 General Plan accommodates future growth within the City limits, the conversion of farmland outside the City limits is minimized (see MEIR, Chapter 6.2). The MEIR concluded that the impact of the 2030 General Plan on agricultural resources within the City was less than significant.

The project site does not contain soils designated as Important Farmland (i.e., Prime Farmland, Unique Farmland or Farmland of Statewide Importance) (NRCS 2010). The site is not zoned for agricultural uses, and there are no known 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. Development of the site would result in no impacts on agricultural resources.

Energy

Structures built as part of the project would be subject to Titles 20 and 24 of the California Code of Regulations, which serve to reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. The 2030 General Plan includes Policies 6.1.10 through 6.1.13 to encourage the use of energy-efficient technology by offering rebates and other incentives to commercial and residential developers, and recruiting businesses that research and promote energy conservation and efficiency.

Policies 6.1.6 through 6.1.8 focus on promoting the use of renewable resources, which would reduce the cumulative impacts associated with use of non-renewable energy sources. In addition, Policies 6.1.5 and 6.1.12 call for the City to work closely with utility providers and industries to promote new energy conservation technologies.

The MEIR evaluated the potential impacts on energy and concluded that the effects would be less than significant (see Impacts 6.11-9 and 6.11-10). The proposed project would result in no new impacts not previously identified and evaluated in the MEIR.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
1. <u>AESTHETICS, LIGHT AND GLARE</u> Would the proposal:			X
A) Create a source of glare that would cause a public hazard or annoyance?			
B) Create a new source of light that would be cast onto oncoming traffic or residential uses?			X
C) Substantially degrade the existing visual character of the site or its surroundings?			X

ENVIRONMENTAL SETTING

The project site is located on a vacant parcel adjacent (to the west of) the Red Lion Woodlake and Conference Center. Other surrounding uses include the Johnston Business Park to the west, (which includes various industrial and commercial businesses), and two health care-related facilities to the southeast (an Apria Health Care facility and the administrative center for a radiological facility associated with Sutter Medical Center). State Route 160 is located approximately 0.7 mile north of the site and commercial uses, such as a Costco and other retail stores, are located to the southeast and east of the project beyond the conference center. There are no structures or debris currently located on the site. The project site is located on flat terrain in an urbanized area, and has two valley oak trees on site; both trees appear to have various types of damage, including fire damage, dry rot, termites, and borer holes (A Better Tree Service, undated). Views of the project area are partially obscured from State Route 160 by trees.

The project site does not contain scenic resources, and is not located in an area designated as a scenic resource or vista. State Route 160, which is an officially designated state scenic highway in some areas, is located within relatively close proximity to the project site (approximately 0.7 mile); however, only 35 miles of State Route 160, from the Contra Costa County line to the southern city limit of Sacramento, are designated as state scenic highway. Therefore, the project is not located near any state scenic highways.

STANDARDS OF SIGNIFICANCE

The significance criteria used to evaluate the project impacts to aesthetics are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines, thresholds of significance adopted by the City in applicable general plans and previous environmental documents, and professional judgment. A significant impact related to aesthetics would occur if the project would:

- substantially degrade the existing visual character or quality of the site and its surroundings; or,

- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR describes the existing visual conditions in the general plan policy area, and the potential changes to those conditions that could result from development consistent with the 2030 General Plan (see MEIR, Chapter 6.13).

The MEIR identified potential impacts for glare (Impact 6.13-1). Mitigation Measure 6.13-1, prohibits new development from: *1) using reflective glass that exceeds 50 percent of any building surface and on the ground three floors; 2) using mirrored glass; 3) using black glass that exceeds 25 percent of any surface of a building; and, 4) using metal building materials that exceed 50 percent of any street-facing surface of a primarily residential building.* This was identified to reduce the effect to a less-than-significant level and is enforced through the Site Plan and Design Review process. Light cast onto oncoming traffic or residential uses is identified as a potential project impact (Impact 6.13-2). The MEIR identified Policy LU 6.1.14 (Compatibility with Adjoining Uses) and its requirement that lighting must be shielded and directed downward as reducing the potential effect to a less-than-significant level.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO PROJECT

None.

The Zoning Code has been replaced by the Planning and Development Code, Title 17 of the City Code. The Planning and development Code does not include the restrictions identified in Mitigation Measure 6.13-1. The provisions of the mitigation measure have been applied to the project as outlined below.

ANSWERS TO CHECKLIST QUESTIONS

Questions A and B

Consistent with the City's lighting standards and Policy LU 6.1.14 (Compatibility with Adjoining Uses), all proposed outdoor lighting would only cast light downward to reduce nocturnal skyglow and glare from the area. The project proposes street and building perimeter lighting that is typical for a commercial development. While the area immediately around the site is currently semi-dark and the project would introduce a new use with new lighting sources, these lighting sources are required to be consistent with the City's lighting standards. The area surrounding the project site consists of light industrial and commercial land uses; any addition of lighting would therefore not affect residential land uses. The project would not create a source of glare that would cause a public hazard or annoyance, nor would it create a new source of light that would cast onto oncoming traffic or residential uses. The project consists of a single-story structure and would not use: reflective glass that exceeds 50 percent of any building surface (and on the ground three floors); mirrored glass; black glass that exceeds 25 percent of any surface of a building, or; metal building materials that exceed 50 percent of any street-facing

surface of a primarily residential building. Impacts related to these issues would be **less than significant**.

Question C

The project is located in an area developed primarily with industrial and commercial properties, with State Route 160 located to the north of the site. The property is a currently vacant, disturbed site, with non-native grasslands and weeds spread throughout the property; the only woody species present were two valley oaks, that had visible damage according to the project Arborist Report (A Better Tree Service, undated; included as Appendix A).

While grading and excavation would occur on site (1,180 cubic yards of cut and 1,180 cubic yards of fill, net 0 cubic yards import and export), the proposed building would be at a similar elevation to the existing light industrial and commercial buildings in the project vicinity.

It should be noted that the vegetation proposed for removal is not considered sensitive or highly valued scenic elements. The proposed development would change the appearance of the site as viewed from nearby areas, but would have similar bulk and scale to the health care facilities located to the south of the project; the single-story building would be partially visible from roadway segments not immediately adjacent to the site. No contrasting architectural features or visual elements are proposed, and the project would be visually compatible with surrounding development. As such, the project is not anticipated to substantially degrade the existing visual character or quality of the site or site surroundings. Therefore, impacts related to the degradation of the project area's existing visual character would be **less than significant**.

MITIGATION MEASURES

None

FINDINGS

The project would have no additional project-specific environmental effects relating to aesthetics.

ADVANCED HEALTH CARE OF SACRAMENTO [P14-038]
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
2. AIR QUALITY/GREENHOUSE GAS <i>Would the proposal:</i> A) Result in construction emissions of NO _x above 85 pounds per day?			X
B) Result in operational emissions of NO _x or ROG above 65 pounds per day?			X
C) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X
C) Result in PM ₁₀ concentrations equal to or greater than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours) in areas where there is evidence of existing or projected violations of this standard?			X
E) Result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm)?			X
F) Result in exposure of sensitive receptors to substantial pollutant concentrations?			X
G) Result in TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources?			X
H) Conflict with the Climate Action Plan?			X

ENVIRONMENTAL SETTING

Regional Setting

The project site is located in the city of Sacramento, within Sacramento County, California, which is within the Sacramento Valley Air Basin (SVAB).

Concentrations of emissions from criteria air pollutants (the most prevalent air pollutants known to be harmful to human health) are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, particulate matter (including respirable particulate matter with an aerodynamic diameter of 10 micrometers or less [PM₁₀] and fine particulate with an

aerodynamic diameter of 2.5 micrometers or less [PM_{2.5}], and carbon monoxide. Ozone is not directly emitted into the air but is formed through complex chemical reactions between precursor emissions of reactive organic gases (ROG) and oxides of nitrogen (NO_x) in the presence of sunlight. ROG are volatile organic compounds that are photochemically reactive. ROG emissions result primarily from incomplete combustion and the evaporation of chemical solvents and fuels. NO_x are a group of gaseous compounds of nitrogen and oxygen that result from the combustion of fuels. Carbon monoxide is also emitted by automobiles and other vehicles. PM₁₀ and PM_{2.5} consist of particulate matter emitted directly into the air, such as fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires and natural windblown dust, and particulate matter formed in the atmosphere by reaction of gaseous precursors (ARB 2009).

The U.S. Environmental Protection Agency established the National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. California has also established its own California Ambient Air Quality Standards (CAAQS) that are at least as stringent as the NAAQS. The SVAB is designated as nonattainment with respect to the NAAQS and CAAQS for ozone, PM₁₀, and PM_{2.5}.

The Sacramento Metropolitan Air Quality Management District (SMAQMD) attains and maintains air quality conditions in Sacramento County through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SMAQMD includes the preparation of plans and programs for the attainment of ambient-air quality standards, adoption and enforcement of rules and regulations, and issuance of permits for stationary sources. SMAQMD also inspects stationary sources, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the Clean Air Act, its amendments, and the California Clean Air Act.

Note that all construction projects are required to implement the SMAQMD's Basic Construction Emission Control Practices.

The Basic Emission Control Practices

The following practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by Sacramento Metropolitan Air Quality Management District Rule 403 and enforced by SMAQMD staff (SMAQMD 2014).

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

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

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by 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.

Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

- 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.

Lead agencies may add these emission control practices as Conditions of Approval or include in a Mitigation Monitoring and Reporting Program.

STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, air quality impacts may be considered significant if construction and/or implementation of the proposed project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- construction emissions of NO_x above 85 pounds per day;
- operational emissions of NO_x or ROG above 65 pounds per day;
- violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- PM₁₀ concentrations equal to or greater than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours) in areas where there is evidence of existing or projected violations of this standard. However, if project emissions of NO_x and ROG are below the emission thresholds given above, then the project would not result in violations of the PM₁₀ ambient air quality standards;
- CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm); or,
- exposure of sensitive receptors to substantial pollutant concentrations.

Ambient air quality standards have not been established for toxic air contaminants (TAC). TAC exposure is deemed to be significant if:

- TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources.

A project is considered to have a significant effect relating to greenhouse gas emissions if it fails to satisfy the requirements of the City's Climate Action Plan.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR addressed the potential effects of the 2030 General Plan on ambient air quality and the potential for exposure of people, especially sensitive receptors such as children or the elderly, to unhealthy pollutant concentrations (see MEIR, Chapter 6.1).

Policies in the 2030 General Plan (Environmental Resources) were identified as mitigating potential effects of development that could occur under the 2030 General Plan. For example, Policy Environmental Resources 6.1.1 calls for the City to work with the California Air Resources Board and the SMAQMD to meet state and federal air quality standards; Policy Environmental Resources 6.1.12 requires the City to review proposed development projects to ensure that the projects incorporate feasible measures that reduce construction and operational emissions; Policy Environmental Resources 6.1.11 calls for coordination of City efforts with SMAQMD; and Policy Environmental Resources 6.1.15 requires the City to give preference to contractors using reduced-emission equipment.

The MEIR identified exposure to sources of TAC as a potential effect. Policies in the 2030 General Plan would reduce the effect to a less-than-significant level. The policies include Environmental Resources 6.1.5, requiring consideration of current guidance provided by the Air Resources Board and SMAQMD; requiring development adjacent to stationary or mobile TAC sources to be designed with consideration of such exposure in design, landscaping and filters; as well as Policies Environmental Resources 6.11.1 and ER 6.11.15, referred to above.

The MEIR identified numerous policies included in the 2030 General Plan that addressed greenhouse gas emissions and climate change (see Draft MEIR, Chapter 8, and pages 8-49 et seq). The MEIR found that greenhouse gas emissions that would be generated by development consistent with the 2030 General Plan would be a significant and unavoidable cumulative impact. The discussion of greenhouse gas emissions and climate change in the 2030 General Plan MEIR are incorporated by reference in this Initial Study (CEQA Guidelines Section 15150).

Policies identified in the 2030 General Plan include directives relating to sustainable development patterns and practices, and increasing the viability of pedestrian, bicycle and public transit modes. A complete list of policies addressing climate change is included in the MEIR in Table 8-5, pages 8-50 et seq; the Final MEIR included additional discussion of greenhouse gas emissions and climate change in response to written comments. See changes to Chapter 8 at Final MEIR pages 2-19 et seq and also Letter 2 and response.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Construction of the proposed project would not include any demolition, but would include the construction of a single-story surgical and stroke recovery center and short-term skilled nursing facility. The facility would include 40 patient rooms, a therapy gymnasium, a commercial kitchen

and scullery, and dining rooms. Construction activities could commence as early as the fall 2015 and would likely be completed within approximately 12 months. NO_x emissions would be generated by off-road construction equipment (e.g., dozers, excavators), truck activity associated with hauling materials to and from the site (although cut and fill would be balanced on site), and worker vehicle trips.

SMAQMD has developed a screening level to assist a project proponent or lead agency in determining if NO_x emissions from constructing a project in Sacramento County will exceed the SMAQMD's construction significance threshold for NO_x. Construction of a project that does not exceed the screening level and meets all the screening parameters would be considered to have a less-than-significant impact on air quality. However, all construction projects regardless of the screening level are required to implement the SMAQMD's Basic Construction Emission Control Practices. The Basic Emission Control Practices are discussed above in the Environmental Setting section.

Projects that are 35 acres or less in size generally will not exceed the SMAQMD's construction NO_x threshold of significance (SMAQMD, 2014). This screening level was developed using default construction inputs in the California Emissions Estimator Model (CalEEMod). Lead agencies cannot use the screening level to determine a project's construction emissions would have a less-than significant impact on air quality unless all of the following parameters are met.

The project does not:

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

As the project proposed the development of a single-story building on a currently vacant lot that is less than 35 acres in size (approximately 2.06 acres), and meets all of the parameters outlined above, project impacts related to construction NO_x emissions would be **less than significant**.

Question B

SMAQMD has identified operational screening thresholds for various land use types (SMAQMD 2014); if a project is below the screening threshold for the applicable land use, then operational air quality emissions NO_x and ROG would be less than significant levels (65 pounds per day for NO_x or 65 pounds per day of ROG). The proposed single-story surgical and stroke recovery center and short-term skilled nursing facility would qualify as the CalEEMod Land Use of a

hospital under the general land use category of commercial. According to the screening thresholds, if a proposed hospital is less than 229,000 square feet in size, then the facility would not have the potential to exceed SMAQMD's recommended mass emission thresholds of 65 pounds per day for NO_x or 65 pounds per day of reactive organic gases (ROG). Projects that are less than the screening level have been determined to result in less than significant NO_x and ROG impacts. Therefore, this impact would be **less than significant** for the proposed project.

Question C

As described in the response to Question A, construction-related emissions of NO_x would not exceed SMAQMD's recommended mass emission thresholds of 85 pounds per day. Therefore, project-related construction emissions of ozone precursors, including NO_x, would not violate or contribute to a violation of the ambient air quality standards for ozone.

As described in the response to Question B, operational emissions of ozone precursors (i.e., ROG and NO_x) would not exceed SMAQMD's recommended mass emission thresholds of 65 pounds per day for NO_x or 65 pounds per day of ROG. Therefore, operation of the proposed project would not violate or contribute to a violation of the ambient air quality standards for ozone.

Sacramento County is nonattainment with respect to the State Ambient Air Quality Standards for PM₁₀ (i.e., 50 micrograms/cubic meter for 24 hours) (SMAQMD 2013). Unlike for ozone, there is no approved regional plan for attaining the PM₁₀ or PM_{2.5} standards (SMAQMD 2014). PM directly emitted from a project is generally regarded as having regional and localized impacts, however, particularly because wood smoke is controlled by SMAQMD Rules 417 and 421, emissions of PM₁₀ and PM_{2.5} are of greatest concern during construction (e.g., site preparation phase) of a proposed project (SMAQMD 2010:8-5). SMAQMD does not recommend that dispersion modeling be performed to evaluate construction projects if they would not result in an area greater than 15 acres in size being actively disturbed on any given day (SMAQMD 2010).

The proposed project would not result in PM₁₀ concentrations equal to or greater than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours) with implementation of SMAQMD's Basic Construction Emission Control Practices during project construction. Therefore, implementation of the proposed project would not violate or contribute to a violation of the ambient air quality standards for PM.

As discussed in the response to Question E, the proposed project would not result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm).

For these reasons, project-generated emissions of criteria air pollutants and precursors, including ozone, ROG, NO_x, PM₁₀, and PM_{2.5} would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. This impact would be **less than significant**.

Question D

As stated above for the response to Question C, Sacramento County is nonattainment with respect to the State Ambient Air Quality Standards for PM₁₀ (i.e., 50 micrograms/cubic meter for 24 hours) (SMAQMD 2013). PM₁₀ and PM_{2.5} are of greatest concern during construction (e.g.,

site preparation phase) of a proposed project (SMAQMD 2014). SMAQMD does not recommend that dispersion modeling be performed to evaluate construction projects if they would not result in an area greater than 15 acres in size being actively disturbed on any given day (SMAQMD 2014), and the proposed project site is 2.06 acres in size.

Construction emissions are described as short term or temporary in duration and have the potential to generate substantial levels of PM₁₀. Fugitive-dust emissions are associated primarily with site preparation and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance, and vehicle travel on and off site. Exhaust emissions of PM₁₀ are also generated by off-road construction equipment (e.g., graders, dozers, excavators). As all projects, whether or not they meet the screening level for NO_x, are required to implement the SMAQMD Basic Emission Control Practices (which would minimize PM₁₀ emissions), project-related construction activity would not result in PM₁₀ concentrations equal to or greater than five percent of the State Ambient Air Quality Standard. With implementation of those the required Basic Emission Control Practices (e.g. watering exposed surfaces twice daily, covering haul trucks, limiting vehicle speeds on unpaved roads, etc.), this impact would be **less than significant**.

Question E

The primary mobile-source pollutant of localized concern is carbon monoxide (CO). The SMAQMD *Guide to Air Quality Assessment in Sacramento County* provides screening criteria to assess whether project-generated vehicle trips would result in the generation of CO emissions that exceed or contribute to an exceedance of the CAAQS for CO (SMAQMD 2009). SMAQMD's recommended screening criteria are divided into the following two tiers.

First Tier

The project would result in a less-than-significant impact to air quality for local CO if:

- Traffic generated by the project would not result in deterioration of intersection level of service (LOS) to LOS E or F; or,
- The project would not contribute additional traffic to an intersection that already operates at LOS of E or F.

Second Tier

If all of the following criteria are met, the project would result in a less-than-significant impact to air quality for local CO:

- The project would not result in an affected intersection experiencing more than 31,600 vehicles per hour;
- The project would not contribute traffic to a tunnel, parking garage, bridge underpass, urban street canyon, or below-grade roadway; or other locations where horizontal or vertical mixing of air would be substantially limited; and,
- The mix of vehicle types at the intersection is not anticipated to be substantially different from the County average (as identified by the EMFAC or CalEEMod models).

Operation of the project would result in a minor increase in vehicle trips along roadways in the project area. Based upon information gathered by the Institute of Transportation Engineers (ITE) *Trip Generation, 9th Edition* the development is expected to generate 17 trips during AM peak

hour, 23 trips during PM peak hour, and 240 daily trips. It should be noted that this is a conservative estimate and actual traffic volumes associated with the project would likely be much lower since this facility will have two specialty equipped private vans to transport patients.

The proposed project was accounted for in the City's General Plan, and MEIR, and the project is consistent with the General Plan land use designation. The MEIR analyzed Level of Service (LOS) at many roadway segments throughout the City; however, the roadway segments and intersections immediately adjacent to the project site were not assessed according to Figure 6.12-3, Existing Roadway LOS of the MEIR (City of Sacramento 2009; 6.12-11). This figure does, however, show that all of the roadways that were assessed in the vicinity of the project site were determined to have an LOS of A through C. The estimate of a maximum of 23 peak-hour project-added trips would not degrade any segments or intersections in the project vicinity to LOS of E or F, and would not contribute additional traffic to an intersection that already operates at LOS of E or F. For this reason, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the 1-hour ambient air quality standard of 20 ppm or the 8-hour standard of 9 ppm. As a result, this direct impact would be **less than significant**.

Question F

As explained in the response to Questions A through E, construction-related emissions of NO_x would not exceed SMAQMD's mass emission threshold of 85 lb/day, operational emissions of ROG and NO_x would not exceed SMAQMD's recommended emission thresholds of 65 pounds per day, construction and operational emissions of PM₁₀ would not be less than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours), and CO concentrations would not exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm). For these reasons, construction- and operation operation-related emissions of criteria air pollutants and precursors would not result in exposure of sensitive receptors to substantial pollutant concentrations. Moreover, as explained in the response to Question G, the level of TAC concentrations and related health risk exposure to residents of the proposed project from nearby sources of TACs, including area roadways, would not be substantial. As a result, this impact would be **less than significant**.

Question G

CARB's Land Use Handbook recommends that a site specific health risk assessment (HRA) be performed for projects that would locate residences or other sensitive land uses within 500 feet of a freeway, urban road with 100,000 vehicles per day (or more), or rural road with 50,000 vehicles per day. (CARB 2005:4). The project site is not located near any major freeway but is located near State Route 160, which is classified as an urban road. According to the City of Sacramento 2035 General Plan Master DEIR, the ADT for the segment of State Route 160 in front of the project site would be 45,900 ADT in the year 2035 with buildout of the General Plan. Therefore, at present and in the future, this roadway would qualify as an urban road with less than 100,000 vehicles per day, and as such not subject to additional impact assessment. Impacts related to the related to TAC exposure as a result of the proposed project would be **less than significant**.

Question H

In 2012, the City adopted a communitywide Climate Action Plan (CAP). The CAP identified a greenhouse gas (GHG) emissions reduction target of 15 percent below 2005 levels by 2020 for communitywide emission sources, and also set longer term communitywide GHG emission reduction goals of 38 percent below 2005 levels by 2030 and 83 percent below 2005 levels by 2050. The CAP contains a comprehensive set of strategies, measures and implementing actions to achieve the 2020 GHG reduction target. The GHG reduction measures and actions apply to both existing sources within the City as of the 2005 baseline as well as projected emissions from new growth and development anticipated in the 2030 General Plan. The CAP also identifies potential adverse physical effects related to climate change on the community, and includes specific adaptation measures to address and mitigate such effects (City of Sacramento 2012).

The City has prepared a Climate Action Plan Consistency Checklist for use in determining project consistency with the CAP pursuant to Section 15183.5 (Appendix B; KD Anderson & Associates 2014).

The proposed project has been reviewed against the City's CAP Consistency Review Checklist (see Appendix B of this IS for the completed CAP Checklist and supporting documentation). The proposed project would be consistent with the following applicable performance standards specified in the CAP Consistency Review Checklist, including:

- Substantial consistency with the 2030 General Plan
 - The project is consistent with the Suburban Center General Plan land use designation, including the goals for land use and urban form, FAR and density requirements;
- Reduction of vehicle miles traveled per capita by 35 percent compared to the statewide average
 - VMT reductions are consistent with the City's VMT/Capita screening map;
- Incorporation of pedestrian facilities and connections to transit consistent with the Pedestrian Master Plan
 - Sidewalks and street lighting are already present along all project site street frontages. The southwest corner of the project site is directly across the street from an American River Bike Trail paved access trail. The project site is approximately one-half mile from the light rail transit corridor along Del Paso Boulevard;
- Incorporation of traffic calming measures (The requirement is not applicable because the project does not include a circulation or roadway system that warrants such measures. The project is an infill project consisting of a single structure which includes a parking lot to serve the project);
- Incorporation of bicycle facilities consistent with the Bikeway Master Plan; and,

As discussed above, the City of Sacramento adopted a communitywide CAP that contains a comprehensive set of strategies, measures and implementing actions to achieve the 2020 GHG reduction target. The CAP is consistent with elements of a plan for the reduction of GHG emissions, in compliance with Section 15183.5 of the CEQA Guidelines, which provides for tiering and streamlining of GHG emissions analysis for projects consistent with a CAP or other similar programmatic plan for the reduction of GHG emissions. Moreover, no features of the proposed project are inconsistent with the strategies and measures in the CAP that plan for future climate change-related risks, including increases in average temperature, diminished

water supply, increased energy demand, and damage to infrastructure. Because the proposed project would be consistent with the CAP, this impact would be considered **less than significant**.

MITIGATION MEASURES

None.

Findings

All additional significant environmental effects of the project relating to air quality/greenhouse gas emissions can be mitigated to a less than significant level.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
3. <u>BIOLOGICAL RESOURCES</u> Would the proposal:			
A) Create a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected?			X
B) Result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal species?		X	
C) Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands)?		X	

ENVIRONMENTAL SETTING

Regional

The project site is located within the City of Sacramento. The regional setting is mainly urban with the Sacramento River corridor supporting riparian woodlands composed of cottonwood, willow, sycamore and valley oak. Agricultural and grassland areas dominate the unincorporated areas of Sacramento County. Native habitats are located primarily outside the City boundaries but also occur along river and stream corridors and on a number of undeveloped parcels. Native habitats in the region include oak woodlands, riparian woodlands, wetlands, and annual grasslands. These native areas provide homes for a rich variety of wildlife including migratory birds such as ducks and raptors as well as larger native fauna such as deer and coyote.

Local

The project site is located north of the American River and east of the Johnston Business Park in a moderately developed area near downtown Sacramento. The immediate urban setting is mainly occupied by commercial and residential development with some open spaces nearby that attracts non-native and very common wildlife species. The site is approximately 0.5 miles from the Sacramento River. The Sacramento River contains stretches of riparian habitat and woodlands that serve as important wildlife habitat and migratory corridors for a variety of native species. Some species, like raptors, could utilize urban habitat for nesting and forage along the river corridor. Therefore, while the site is urban in nature, its close proximity to the Sacramento River allows for the potential for use by native and sensitive species. Most natural habitats have been removed through industrial, commercial, and residential development.

Habitat on and immediately adjacent to the project site mainly consists of highly disturbed non-native annual grasslands. The only woody species present onsite are two native valley oaks. There are no jurisdictional wetlands, riparian, or other special status habitats located on or immediately adjacent to the project site. Observed plant species include soft chess, ripgut brome, barley, wild oats, yellow star-thistle, lettuce, milk thistle, and vetch (Gibson and Skordal 2014). Suburban and urban wildlife such as house finch, house sparrow, American robin, mourning dove, and American crow are likely to occupy this area.

Sensitive Biological Resources

Information in this section is based on data collected during reconnaissance-level field surveys (2014), and review of other relevant documentation for the project area and surrounding area including:

- CNDDDB record search within 10 mile radius of the project site (2014)
- Jurisdictional Delineation and Special-Status Species Assessment (Gibson and Skordal 2014; included as Appendix C)
- Sacramento General Plan 2030 (2009)

Sensitive biological resources evaluated as part of this analysis include special-status species and sensitive natural communities. The California Natural Diversity Database (CNDDDB) was used as a primary source to identify previously reported occurrences of special-status species and sensitive natural communities in the project vicinity. The CNDDDB is a statewide database, managed by the California Department of Fish and Wildlife (CDFW) that is continually updated with the location and condition of the state's rare and declining species and habitats. Although the CNDDDB is the most current and reliable tool available for tracking occurrences of special-status species, it contains only those records that have been reported to CDFW.

Special-status Species

The special-status species evaluation considers those species identified as having relative scarcity and/or declining populations by the United States Fish and Wildlife Service (USFWS) or CDFW. Special-status species include those formally listed as threatened or endangered, those proposed for formal listing, candidates for federal listing, and those classified as species of special concern by CDFW. Included are also species considered to be "special animals" or "fully protected" by the CDFW and plant species considered to be rare, threatened, or endangered in California by the California Native Plant Society (CNPS). This includes species on Lists 1, 2, 3, and 4 of the CNPS Ranking System:

- List 1 A: Plants presumed extinct in California.
- List 1 B: Plants rare, threatened, or endangered in California and elsewhere.
- List 2: Plants rare, threatened, or endangered in California, but more common elsewhere.
- List 3: Plants about which the CNPS needs more information – a review list.
- List 4: Plants of limited distribution – a watch list.

The CNPS Threat Rank is an extension that is added onto the CNPS List. It ranges from .1 to .3 and indicates the level of endangerment to the species with .1 representing the most endangered and .3 being the least endangered.

Also included are taxa meeting the criteria for listing under Section 15380 of the CEQA Guidelines. (Note that all CNPS List 1 and 2 and some List 3 species may fall under Section 15380 of CEQA.)

Reconnaissance level field surveys were conducted on June 5, 2014, to assess the presence of habitats within the study area necessary to support special-status species. Meandering transects were performed on foot throughout the study area, and the entire site was visually observed.

Special-status Plants

No protocol-level botanical surveys for any special-status species were conducted on the project site. However, nine special status species have been documented in the CNDDDB within a 10-mile radius of the project site. There are six special-status species that are within vernal pools and other wet habitats and include dwarf *downingia*, *legenere*, Bogg's Lake hedge-hyssop, wooly rose-mallow, Suisun marsh aster, and Sanford's arrowhead. Because the site does not encompass the required wetland habitats necessary for these species to exist, they have been eliminated from further evaluation. Three special-status species that are known to grow in dryer habitats and include: Ferris' milk-vetch, northern California black walnut and stinkbells. Northern California black walnut is a CNPS list 1B.1 species. Ferris' milk-vetch prefers valley and foothill grasslands with clay or adobe clay soils. Northern California black walnuts naturally occur in riparian woodlands or forests with deep alluvial soils. Currently, only two of three native stands are still in existence. Stinkbells, so named because of its strong odor, is a species of lily commonly associated with non-native annual grasslands with heavy clay soils from 30 to 5,100 feet. It blooms from March to June and also favors other habitat types such as chaparral, cismontane woodland, and pinyon and juniper woodland. Stinkbells have also been documented on serpentine soils. Because the site lacks the appropriate soil characteristics and habitat requirements for these two species, they have been eliminated from further evaluation.

Special-Status Wildlife

Thirty-two special-status wildlife species have been documented in the CNDDDB 10-mile search area. Only Swainson hawk, white-tailed kite, Cooper's Hawk, and hoary bat that were found within the 10-mile radius have high potential for occurrence on site (Table 1). There is a low potential for occurrence for the American badger, tricolored blackbird, golden eagle, burrowing owl, ferruginous hawk, merlin, song sparrow – Modesto population, purple martin, bank swallow, and least Bell's vireo. No elderberry plants were observed during the biological site reconnaissance in June 2014; therefore, valley elderberry longhorn beetle habitat will not be analyzed. All aquatic or wetland species were eliminated from further evaluation in this document as well.

Table 1 Special-status Wildlife with Potential to Occur on the Project Site					
Scientific Name (Common Name)	Federal Status	State Status	CNPS Listing	Habitat Requirements	Potential for Occurrence
Mammals					
<i>Lasiurus cinereus</i> (hoary bat)	None	CDFG-Special Animals	None	Prefer older large leaf trees such as cottonwoods, willows, and fruit/nut trees for daytime roosts. Often found in association with riparian corridors. Need open spaces to forage.	The potential for occurrence is high due to the presence of foraging and roosting habitats.
Birds					
<i>Accipiter cooperi</i> (Cooper's hawk)	None	CDFG-Special Animals	None	Inhabits forested habitats, forest edge, and riparian habitat, may forage in adjacent grassland and fields.	Potential for occurrence is high due to the presence of suitable foraging and nesting habitats within the study area.
<i>Buteo swainsoni</i> (Swainson's hawk)	None	Threatened	None	Nests in tall cottonwoods, valley oaks or willows. Forages in fields, cropland, irrigated pasture, and grassland near large riparian corridors.	Potential for occurrence is high due to the presence of suitable foraging and nesting habitats within the study area, and the close proximity to a known nesting site along the American River, located approximately 0.5 mile to the south.
<i>Elanus leucurus</i> (white-tailed kite)	None	Fully Protected	None	Nests in riparian corridors along streams and rivers, and forages in nearby grasslands and fields.	Potential for occurrence is high due to the presence of suitable foraging and nesting habitats within the study area.

The following species were immediately eliminated from further evaluation in this document because they are restricted to particular habitat types (e.g., vernal pools, streams, ponds, riparian woodland, forests) that are not present on the project site:

- Great egret
- Great blue heron
- Western pond turtle
- Giant garter snake
- Sacramento perch
- Central Valley steelhead
- Chinook salmon - spring-run

- Sacramento splittail
- Longfin smelt
- Vernal pool fairy shrimp
- Midvalley fairy shrimp
- Sacramento Valley tiger beetle
- Valley elderberry longhorn beetle
- Hairy water flea
- Ricksecker's water scavenger beetle
- Vernal pool tadpole shrimp
- California linderiella

Sensitive Habitats and Special-Status Plant Communities

Sensitive habitats include those that are of special concern to resource agencies or are afforded specific consideration through CEQA, Section 1602 of the California Fish and Game Code, Section 404 of the CWA, and the State's Porter-Cologne Act, as discussed under "Regulatory Background" below. Sensitive natural habitat may be of special concern to these agencies and conservation organizations for a variety of reasons, including their locally or regionally declining status, or because they provide important habitat to common and special-status species.

CDFW maintains a list of plant communities that are native to California. Within that list, CDFW identifies special-status plant communities (a.k.a. sensitive natural communities), which they define as communities that are of limited distribution statewide or within a county or region and often vulnerable to environmental effects of projects (CDFW 2013: ix). These communities may or may not contain special-status species or their habitat. Special-status plant communities are tracked in the CNDDDB, a statewide inventory of the locations and conditions of the state's rarest plant and animal taxa and vegetation types.

No native plant communities on CDFW's list of special-status plant communities are present on the project site. Elderberry savanna and Great Valley cottonwood riparian forest is located within the 10-mile radius along the American River but is not located within the project site. There are no potential wetlands or waters of the United States within this site (Gibson and Skordal 2014).

Regulatory Background

Clean Water Act (33 USC 1252-1376)

Any person, firm, or agency planning to alter or work in "waters of the U.S." including the discharge of dredged or fill material, must first obtain authorization from the USACE under Section 404 of the Clean Water Act (CWA) (33 USC 1344). Permits, licenses, variances, or similar authorization may also be required by other federal, state, and local statutes. Section 10 of the Rivers and Harbors Act of 1899 prohibits the obstruction or alteration of navigable waters of the U.S. without a permit from USACE (33 USC 403). The CWA provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters.

Section 401 of the CWA requires that an applicant for a federal license or permit that allows activities resulting in a discharge to waters of the U.S. must obtain a state certification that the discharge complies with other provisions of CWA. The Regional Water Quality Control Board

(RWQCB) administers the certification program in California, and may require State Water Quality Certification before other permits are issued.

Section 402 of the CWA establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the U.S. Section 404 of the CWA establishes a permit program administered by USACE regulating the discharge of dredged or fill material into waters of the U.S. (including wetlands). Implementing regulations by USACE are found at 33 CFR Parts 320-332.

The Section 404 (b)(1) Guidelines were developed by the USEPA in conjunction with USACE (40 CFR Part 230), allowing the discharge of dredged or fill material for non-water dependent uses into special aquatic sites only if there is no practicable alternative that would have less adverse impacts.

California Environmental Quality Act

Under the CEQA of 1970 (PRC Section 21000 et seq.), lead agencies analyze whether projects would have a substantial adverse effect on a candidate, sensitive, or special status species (Public Resources Code Section 21001(c)). These “special-status” species generally include those listed under federal and state endangered species acts (FESA and CESA, respectively), and species that are not currently protected by statute or regulation, but would be considered rare, threatened, or endangered under the criteria included State CEQA Guidelines Section 15380. Therefore, species that are considered rare are addressed in this study regardless of whether they are afforded protection through any other statute or regulation. The CNPS inventories the native flora of California and ranks species according to rarity; plants ranked as 1A, 1B, and 2 are generally considered special-status species under CEQA.¹

Although threatened and endangered species are protected by specific federal and state statutes, State CEQA Guidelines Section 15380(d) provides that a species not listed on the federal or state list of protected species may be considered rare if it can be shown to meet certain specified criteria. These criteria have been modeled after the definition in FESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals. Section 15380(d) of the State CEQA Guidelines allows a public agency to undertake a review to determine if a significant effect on species that have not yet been listed by either the USFWS or CDFW (i.e., candidate species) would occur. Thus CEQA provides an agency with the ability to protect a species from the potential impacts of a project until the respective government agency has an opportunity to designate the species as protected, if warranted.

California Department of Fish and Wildlife

The CDFW is responsible for issuing permits for impacts to state-listed plant and animal species under the state ESA. No state-listed species were observed within the project area.

The CDFW is also responsible for issuing permits for impacts to streambeds and wetlands under its jurisdiction as described above. Any impacts to CDFW jurisdictional areas are regulated under California Fish and Game Code Section 1602 and would require a Streambed/Lake Alteration Agreement.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act, Water Code Section 13000 et seq.) is California's statutory authority for the protection of water quality in conjunction with the federal CWA. The Porter-Cologne Act requires the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCB) under the Clean Water Act (CWA) to adopt and periodically update water quality control plans, or basin plans. Basin plans are plans in which beneficial uses, water quality objectives, and implementation programs are established for each of the nine regions in California. The Porter-Cologne Act also requires dischargers of pollutants or dredged or fill material to notify the RWQCBs of such activities by filing Reports of Waste Discharge and authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements, national pollutant discharge elimination system (NPDES) permits, Section 401 water quality certifications, or other approvals.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

The following General Plan policies would avoid or lessen environmental impacts as identified in the MEIR and are considered mitigation measures for the following project-level and cumulative impacts:

Impact 6.3-2: Implementation of the 2030 General Plan could adversely affect special-status plant species due to the substantial degradation of the quality of the environment or reduction of population or habitat below self-sustaining levels.

Impact 6.3-3: Implementation of the 2030 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status invertebrates.

Impact 6.3-4: Implementation of the 2030 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels with special-status birds, through the loss of both nesting and foraging habitat.

Impact 6.3-5: Implementation of the 2030 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status amphibians and reptiles.

Impact 6.3-6: Implementation of the 2030 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status mammals.

Impact 6.3-10: Implementation of the 2030 General Plan could result in the loss of California Department of Fish and Game (CDFG)-defined sensitive natural communities such as elderberry savanna, northern claypan vernal pools, and northern hardpan vernal pools.

Impact 6.3-13: Implementation of the City's 2030 General Plan and regional buildout assumed in the Sacramento Valley could result in a regional loss of special-status plant or wildlife species or their habitat.

Mitigation Measure 6.3-2 - General Plan Policy ER 2.1.10 - Habitat Assessments: The City shall consider the potential impact on sensitive plants and for each project requiring discretionary approval and shall require preconstruction surveys and/or habitat assessments for sensitive plant and wildlife species. If the preconstruction survey and/or habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either

(1) protocol-level or industry recognized (if no protocol has been established) surveys shall be conducted; or (2) presence of the species shall be assumed to occur in suitable habitat on the project site. Survey Reports shall be prepared and submitted to the City and the CDFG or USFWS (depending on the species) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law.

Impact 6.3-8: Implementation of the 2030 General Plan could result in the loss or modification of riparian habitat, resulting in a substantial adverse effect.

Mitigation Measure 6.3-8 – General Plan Policy ER 2.1.5 - Riparian Habitat Integrity: The City shall preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by preserving native plants and, to the extent feasible, removing invasive, non-native plants. If not feasible, adverse impacts on riparian habitat shall be mitigated by the preservation and/or restoration of this habitat at a 1:1 ratio, in perpetuity.

Impact 6.3-9: Implementation of the 2030 General Plan could result in a substantial adverse effect on state or federally protected wetlands and/or waters of the United States through direct removal, filling, or hydrological interruption.

Mitigation Measure 6.3-9 – General Plan Policy ER 2.1.6 – Wetland Protection: The City shall preserve and protect wetland resources including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetland, to the extent feasible. If not feasible, the mitigation of all adverse impacts on wetland resources shall be required in compliance with State and Federal regulations protecting wetland resources, and if applicable, threatened or endangered species. Additionally, the City may require either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no-net-loss of value and/or function.

Impact 6.3-14: Implementation of the 2030 General Plan and regional buildout assumed in the Sacramento Valley could contribute to the cumulative loss of sensitive natural communities including wetlands and riparian habitat in the region.

The project as proposed includes implementation of Mitigation Measures 6.3-8 and 6.3-9 from the MEIR as required by the City.

Standards of Significance

For purposes of this environmental document, an impact would be significant if any of the following conditions or potential thereof, would result with implementation of the proposed project:

- Creation of a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected;
- Substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal;
- Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands); or

For the purposes of this document, “special-status” has been defined to include those species, which are:

- Listed as endangered or threatened under the federal Endangered Species Act (ESA) (or formally proposed for, or candidates for, listing);
- Listed as endangered or threatened under the California ESA (or proposed for listing);
- Designated as endangered or rare, pursuant to CDFW Code (Section 1901);
- Designated as fully protected, pursuant to CDFW Code (Section 3511, 4700, or 5050);
- Designated as species of concern by USFWS, or as species of special concern to CDFW; and
- Plants or animals that meet the definition of rare or endangered under CEQA.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 6.3 of the MEIR evaluated the effects of the 2030 General Plan on biological resources within the General Plan policy area. The MEIR identified potential impacts in terms of degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status birds, through the loss of both nesting and foraging habitat.

Policies in the 2030 General Plan were identified as mitigating the effects of development that could occur under the provisions of the 2030 General Plan. Policy 2.1.5 calls for the City to preserve the ecological integrity of creek corridors and other riparian resources; Policy Environmental Resources 2.1.10 requires the City to consider the potential impact on sensitive plants for each project and to require pre-construction surveys when appropriate; and Policy 2.1.11 requires the City to coordinate its actions with those of the CDFW, USFWS, and other agencies in the protection of resources.

The MEIR concluded that the cumulative effects of development that could occur under the 2030 General Plan would be significant and unavoidable as they related to effects on special-status plant species (Impact 6.3-2), reduction of habitat for special-status invertebrates (Impact 6.3-3), loss of habitat for special-status birds (Impact 6.3-4), loss of habitat for special-status amphibians and reptiles (Impact 6.3-5), loss of habitat for special-status mammals (Impact 6.5-6), special-status fish (Impact 6.3-7) and, in general, loss of riparian habitat, wetlands and sensitive natural communities such as elderberry savannah (Impacts 6.3-8 through 10).

MITIGATION MEASURES FROM 2030 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

The site has previously not been developed and does not contain known hazardous materials, therefore site preparation activities associated with the project, including excavation, grading, and trenching, are not likely to disturb contaminated soil that may contain hazardous

substances that could cause injury or death to special-status species. Please refer to the Hazards section of this Initial Study regarding the risk of an accidental release of hazardous substances that could adversely affect special-status species. Since there are no known hazardous materials onsite, a **less than significant** impact from hazardous materials on special-status species

Question B

The project site provides limited value to threatened and endangered wildlife species because it is primarily disturbed with little vegetation and development of the site would not eliminate any habitat important to the long-term survival of any species or community and would not substantially reduce the number or restrict the range of any species.

No threatened or endangered plants were found during reconnaissance surveys or database reviews to be on site. It is unlikely that any threatened or endangered plants would be found at the site due to the urban, disturbed nature and lack of natural habitats at the site. Therefore, construction and operation of the project would not have an impact on special-status plants.

Due to the urban nature of the site, it is unlikely that Swainson's hawks would occupy the trees on site. However, Swainson's hawk nests were found approximately 0.5 miles south along the American River; so the potential still exists. There are only two trees located on site that have suffered from fire and termites, limiting the potential for them to become a nesting site. If the trees were utilized for nesting by Swainson's hawks at the time of removal, adults or young could be killed.

Construction activities would elevate noise levels and could cause disturbance to nesting or roosting of Swainson's hawks on site or immediately adjacent to the site. Construction occurring during breeding, reproduction, and juvenile rearing periods would mean there is potential for noise disturbance to negatively affect breeding or reproduction of species on or adjacent to the project site.

If active nests are present in trees that would be removed during the raptor breeding season (February–August), mortality of eggs and chicks could result. In addition, project construction could disturb active nests by increased activity and higher than ambient noise levels near the site or in trees not yet removed from the site, potentially resulting in nest abandonment by the adults and mortality of chicks and eggs. These impacts would be in conflict with CESA, CDFW 3503.5 code and the Migratory Bird Act. The loss of an active Swainson's Hawk nest or take of individuals from construction would be a **significant** impact. Implementation of Mitigation Measure BIO-1 would reduce the impact to a less than significant level.

Question C

The project site provides limited value to wildlife species and development of the site would not eliminate any habitat important to the long-term survival of any species or community and would not substantially reduce the number or restrict the range of any species.

No wetland, riparian, aquatic, or other sensitive habitat would be affected by the proposed project as none of these special-status habitats exist on the site or would be affected offsite.

There are no native wildlife nursery sites or established migratory routes through the project site that are vital for the movement of any resident or migratory fish or wildlife species or population.

Project implementation would not interfere substantially with the movement of native resident or migratory wildlife species because the site is surrounded by urban development and does not currently provide an important connection between any areas of natural habitat that would otherwise be isolated.

Tree and vegetation removal along with ground disturbances associated with construction of the project site could result in direct destruction of bird nests protected under the Migratory Bird Treaty Act and CDFW 3503.5 code. Project construction noise could also result in disturbance of raptors and migratory birds causing nest abandonment by the adults and mortality of chicks and eggs. Thus, negatively affect breeding or reproduction of species on or adjacent to the project site. The loss of some nests of common migratory bird species (e.g., mourning dove, American robin, and scrub jay) would not be considered a substantial impact, because it would not result in a substantial effect on their populations locally or regionally. However, the destruction of any migratory bird nest is a violation of the Migratory Bird Treaty Act and would be considered a significant impact. If the trees were utilized for nesting by raptors at the time of removal, adults or young could be killed. This impact would be in conflict with CDFW 3503.5 code. The loss of an active raptor nest or take of individuals from construction would, therefore, be a **significant** impact. Implementation of Mitigation Measure BIO-1 would reduce these impacts to both migratory bird and raptors to a less-than-significant level.

MITIGATION MEASURES

Mitigation Measure BIO-1: The following mitigation measure would apply to construction of the proposed project to reduce impacts on Swainson's hawk, tree-nesting raptors and migratory birds:

- a. *If construction activities occur during the breeding season (between February 16 and August 31), the construction contractor shall retain a qualified biologist to conduct preconstruction surveys for Swainson's hawk, nesting raptors and migratory birds and to identify active nests on and within 0.25 mile of the demolition and construction site. The surveys shall be conducted no more than 30 days before the beginning of construction activities that could remove trees or otherwise disturb nesting raptors. To the extent feasible, guidelines provided in Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in the Central Valley (Swainson's Hawk Technical Advisory Committee 2000) will be followed. Preconstruction surveys for Swainson's hawk, nesting raptor, and migratory birds are not required if construction activities occur outside of the breeding season (September 1 through February 15).*
- b. *If active nests are found, the construction contractor shall establish appropriate buffers around the nests. The qualified biologist will determine an adequate buffer for the species and nest. No project activity shall commence within the buffer area until a qualified biologist confirms that any young have fledged and the nest is no longer active. Monitoring of the nest by a qualified biologist shall be required if the activity has the potential to adversely affect the nest. For Swainson's hawk nests, CDFG guidelines (1994) recommend maintenance of 0.25 mile buffers around Swainson's hawk nests in developed areas, but the size of the buffer may be adjusted if a qualified biologist, in consultation with CDFW, determines that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist will be required if the activity has potential to adversely affect the nest.*

FINDINGS

With implementation of the above MEIR and project-specific mitigation measures, the proposed project would not result in a significant impact on special-status species and would have a **less than significant** impact on biological resources. All additional significant environmental effects of the project relating to biological resources are mitigated to a **less than significant** level.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
4. CULTURAL RESOURCES Would the project:			
A) Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in § 15064.5?		X	
B) Directly or indirectly destroy a unique paleontological resource?		X	

ENVIRONMENTAL SETTING

The primary sources referenced for this section are the Cultural Resource Assessment (Peak & Associates, 2014; included as Appendix D) for the proposed project, the Geotechnical Investigation for the proposed project (Raney Geotechnical, 2014; included as Appendix E), and the MEIR for the General Plan for the City of Sacramento.

The project site is a vacant lot has not been previously developed. A records search was conducted through the North Central Information Center (NCIC) of the California Historical Resources Information Center on June 23, 2014 (NCIC file number SAC- 14-86). The NCIC report (Appendix 2) indicates that the parcel has never been subject to a systematic survey for cultural resources, and no prehistoric or historic period resources have been recorded within or adjacent to the project area.

A letter was sent to the Native American Heritage Commission on June 22, 2014 requesting a check of the Sacred Lands files (Appendix 3). To date, no reply has been received from that agency. Letters were sent to the following groups requesting information on resources and issues of concern on June 20, 2014: Rose Enos; April Wallace Moore; Gene Whitehouse, Chairperson, United Auburn Community of Auburn Rancheria; Jason Camp, THPO, United Auburn Community of Auburn Rancheria; Marcos Guerrero, Tribal Preservation Committee, United Auburn Community of Auburn Rancheria; Grayson Coney, Cultural Director, T'si-Akim Maidu; Eileen Moon, Vice Chairperson, T'si-Akim Maidu; Hermo Olanio, Vice Chairperson, Shingle Springs Band of Miwok Indians; Nicholas Fonseca, Chairperson, Shingle Springs Band of Miwok Indians; and, Daniel Fonseca, Cultural Resource Director, Shingle Springs Band of Miwok Indians. A reply has been received from the Shingle Springs Band of Miwok Indians

dated July 15, 2014 indicating that they do not know of all resources of concern in the project area. A copy of this report will be sent to their office.

A field survey of the site was conducted by Peak & Associates (2014). The parcel has been leveled and recently plowed. There was excellent ground visibility due to recent mechanical weed abatement. About 10-15 chunks of concrete are scattered throughout parcel, with occasional modern trash. There are no visible soil color changes or historic or prehistoric artifacts. There are no cultural resources within the project sites.

STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, cultural resource impacts may be considered significant if the proposed project would result in one or more of the following:

1. Cause a substantial change in the significance of a historical or archaeological resource as defined in CEQA Guidelines Section 15064.5 or,
2. Directly or indirectly destroy a unique paleontological resource.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the potential effects of development under the 2030 General Plan on prehistoric and historic resources (see Chapter 6.4). The MEIR identified significant and unavoidable effects on historic resources and archaeological resources.

General plan policies identified as reducing such effects call for identification of resources on project sites (Policy HCR 2.1.1), implementation of applicable laws and regulations (Policy HCR 2.1.2 and HCR 2.1.15), early consultation with owners and land developers to minimize effects (Policy HCR 2.1.10 and encouragement of adaptive reuse of historic resources (Policy HCR 2.1.13). Demolition of historic resources is deemed a last resort. (Policy HCR 1.1.14)

MITIGATION MEASURES FROM 2030 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

A cultural resource assessment was prepared for the project site by Peak & Associates; a field survey of the site was conducted by Peak & Associates as part of this assessment. The parcel has been leveled and recently plowed. There was excellent ground visibility due to recent mechanical weed abatement, and about 10-15 chunks of concrete were seen scattered throughout parcel, along with occasional modern trash; there were no visible soil color changes or historic or prehistoric artifacts. The cultural resource assessment concluded that there are no cultural resources within the project sites. (Peak & Associates, 2014). However, although the project site does not contain any historical resources and implementation of the proposed project would not be expected to affect any historical resources, construction of the proposed project could result in the inadvertent discovery of undocumented archaeological materials or human remains and the disturbance or destruction of a known historical or archaeological resource. Therefore the project could result in **potentially significant impacts** related to

cultural resources. Implementation of Mitigation Measures CUL-1 through CUL-3 described below would reduce the impacts to a less-than-significant level.

Question B

As discussed in Section 6.5, Geology, of the General Plan MEIR, the City of Sacramento is not considered sensitive for paleontological resources, and the likelihood for finding something paleontologically significant would be very low (page 6.5-25). General Plan Policy HCR 2.1.15 requires compliance with protocols that protect or mitigate impacts to archeological, historic, and cultural resources, including prehistoric resources, should anything be discovered during excavation or construction. The City also interprets this policy to address paleontological resources (MEIR, page 6.5-25).

While the project site is not considered sensitive for paleontological resources and the likelihood of encountering paleontological resources is very low, project-related earth-disturbing activities could affect the integrity of a paleontological site, thereby causing a substantial change in the significance of the resource. Therefore the project could result in **potentially significant impacts** on paleontological resources. Implementation of Mitigation Measures CUL-3 and CUL-4 described below would reduce the impacts to less than significant.

MITIGATION MEASURES

Mitigation Measure CUL-1: *In the event that any subsurface historic or prehistoric archeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, animal bone, obsidian and/or mortars are discovered during construction-related earth-moving activities, all work within 50 meters of the resources shall be halted, and the City shall consult with a qualified archeologist to assess the significance of the find. Archaeological test excavations shall be conducted by a qualified archeologist to aid in determining the nature and integrity of the find. If the find is determined to be significant by the qualified archeologist, representatives of the City and the qualified archeologist shall coordinate to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis and professional museum curation. In addition, a report shall be prepared by the qualified archeologist according to current professional standards.*

Mitigation Measure CUL-2: *If a Native American site is discovered, the evaluation process shall include consultation with the appropriate Native American representatives. If Native American archeological, ethnographic, or spiritual resources are involved, all identification and treatment shall be conducted by qualified archeologists, who are certified by the Society of Professional Archeologists (SOPA) and/or meet the federal 24 standards as stated in the Code of Federal Regulations (36 CFR 61), and Native American representatives, who are approved by the local Native American community as scholars of the cultural traditions.*

Mitigation Measure CUL-3: *If a human bone or bone of unknown origin is found during construction, all work shall stop in the vicinity of the find, and the County Coroner shall be contacted immediately. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission, who shall notify the person most likely believed to be a descendant. The most likely descendant shall work with the contractor to develop a program for re-internment of the human remains and any associated artifacts. No additional work is to take place within the immediate vicinity of the find until the identified appropriate actions have taken place.*

Mitigation Measure CUL-4: *Should paleontological resources be identified at any project construction sites during any phase of construction, the construction manager shall cease operation at the site of the discovery and immediately notify the City of Sacramento Community Development Department. The project applicant shall retain a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less than significant level. In considering any suggested mitigation proposed by the consulting paleontologist, the Community Development Department shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for paleontological resources is carried out.*

FINDINGS

With implementation of Mitigation Measure CUL-1 through CUL-4, all additional significant environmental effects of the project relating to cultural resources can be mitigated to a **less than significant** level.

	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
Issues:			
5. GEOLOGY AND SOILS Would the project allow a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards?			X

ENVIRONMENTAL SETTING

General

The subject property is located within the Sacramento Valley portion of the Great Valley Geomorphic Province of California. The Great Valley is bordered to the north by the Cascade and Klamath Ranges, to the west by the Coast Ranges, to the east by the Sierra Nevada, and to the south by the Transverse Ranges. The valley was formed by tilting of the Sierran Block with the western side dropping to form the valley and eastern side uplifting to form the Sierra Nevada. The valley is characterized by a thick sequence of sediments derived from erosion of the adjacent Sierra Nevada to the east and the Coast Ranges to the west. These sedimentary rocks are mainly Cretaceous in age. According to U.S. Geological Survey mapping prepared by Helley and Harwood (1985) the surface and near surface deposits are recognized as undivided Holocene basin deposits, as well as levee and channel deposits. These deposits typically consist of silt, sand and clay deposited by drainages similar to present-day stream and river systems.

STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact is considered significant if it allows a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 6.5 of the MEIR evaluated the potential effects related to seismic hazards, underlying soil characteristics, slope stability, erosion, existing mineral resources and paleontological resources in the general plan policy area. Implementation of identified policies in the 2030 General Plan reduced all effects to a less than significant level. Policies EC 1.1.1 through 1.1.3 require regular review of the City's seismic and geologic safety standards, geotechnical investigations for project sites and retrofit of critical facilities such as hospitals and schools.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

As discussed above (Environmental Setting), the project would not be subject to fault rupture. However, the 2030 General Plan indicates that ground shaking would occur periodically in Sacramento as a result of distant earthquakes. The State of California provides minimum standards for building design through the California Building Standards Code (CBSC) (Title 24 of the California Code of Regulations). The CBSC is based on more the federal Uniform Building Code (UBC) but is more detailed and stringent than the federal UBC. Specific minimum seismic safety requirements are set forth in Chapter 23 of the CBSC. The state earth protection law (California Health and Safety Code Section 191000 et seq.) requires that buildings be designed to resist stresses produced by lateral forces caused by earthquakes. Earthquake resistant design and materials are required to meet or exceed the current seismic engineering standards of the CBSC Seismic Risk Zone 3 improvements. The proposed project would be required to comply with CBSC requirements and the City's 2030 General Plan and MEIR, which require project applicants to prepare site-specific geotechnical evaluations and conformance with Title 24 of the California Code of Regulations.

Soil liquefaction is the loss of strength of low- to no- cohesion soils (usually sands) that occurs when pore water pressure exceeds the confining stress (weight) of the soils. Liquefaction normally occurs only under saturated conditions and in soils with a low relative density. Liquefaction can occur during earthquakes as vibrations induce soils to readjust to a more compact state. Experience has shown that earthquake induced liquefaction normally occurs only within the upper 50 to 60 feet of the soil profile. The test borings at the project site show that the subsurface soils primarily are dense and cemented silts. Such soils are not considered susceptible to seismic induced liquefaction. The borings, along with experience in the area, show that the subsurface strata also can include layers or lenses of dense to very dense sands (Raney Geotechnical, 2014).

Per City requirements (2030 MEIR Policy EC 1.1.2), a geotechnical investigation of the site has been completed (Raney Geotechnical, 2014) to determine the potential for ground rupture, earth shaking, and liquefaction due to seismic events, as well as expansive soils problems. Construction activities would involve excavating, filling, moving, grading, and temporarily stockpiling soils onsite, which would remove any vegetative cover and expose site soils to erosion from wind and surface water runoff. The City has adopted standard measures to control erosion and sediment during construction and all projects in the City are required to comply with the City's Standard Construction Specifications for Erosion and Sediment Control. 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." The 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. As required by the City, recommendations identified in the 2014 geotechnical engineering report for the proposed development would also be implemented (Raney Geotechnical, 2014).

Because the proposed project would be required to comply with federal, state, and local construction standards, it would not expose people or structures to the risk of loss, injury, or death. In addition, these standards along with recommendations for project construction based

on the findings of the investigation provided in the geotechnical engineering report for the site (related to project earthwork, foundations, seismic design, the grade of the floor slabs, and pavements) require the project applicant to identify and protect against potential hazards from ground-shaking, liquefaction, unstable soil conditions, and/or soil erosion problems on the project site. Therefore, a **less than significant** seismic impact would occur.

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional project-specific environmental effects relating to geology and soils.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
6. HAZARDS			
Would the project:			
A) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities?			X
B) Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials?			X
C) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities?			X

ENVIRONMENTAL AND REGULATORY SETTING

Federal regulations and regulations adopted by the Sacramento Metropolitan Air Quality Management District (SMAQMD) apply to the identification and treatment of hazardous materials during demolition and construction activities. Failure to comply with these regulations respecting asbestos may result in a Notice of Violation being issued by the SMAQMD and civil penalties under state and/or federal law, in addition to possible action by U.S. EPA under federal law.

Federal law covers a number of different activities involving asbestos, including demolition and renovation of structures (40 CFR § 61.145).

A field survey of the site was conducted whereby approximately 10-15 chunks of concrete were noted scattered throughout parcel, with occasional modern trash. No obvious signs of soil staining or other indicators of hazardous materials were noted. The project site has not been previously developed and there are no currently existing structures on site; no demolition would be necessary as part of project implementation.

SMAQMD Rule 902 and Commercial Structures

The work practices and administrative requirements of Rule 902 apply to all commercial renovations and demolitions where the amount of Regulated Asbestos-Containing Material (RACM) is greater than:

- 260 lineal feet of RACM on pipes, or
- 160 square feet of RACM on other facility components, or

- 35 cubic feet of RACM that could not be measured otherwise.

The administrative requirements of Rule 902 apply to any demolition of commercial structures, regardless of the amount of RACM.

Asbestos Surveys

To determine the amount of RACM in a structure, Rule 902 requires that a survey be conducted prior to demolition or renovation unless:

- the structure is otherwise exempt from the rule, or
- any material that has a propensity to contain asbestos (so-called "suspect material") is treated as if it is RACM.

Surveys must be done by a licensed asbestos consultant and require laboratory analysis. Asbestos consultants are listed in the phone book under "Asbestos Consultants." Large industrial facilities may use non-licensed employees if those employees are trained by the U.S. EPA. Questions regarding the use of non-licensed employees should be directed to the AQMD.

Removal Practices, Removal Plans/Notification and Disposal

If the survey shows that there are asbestos-containing materials present, the SMAQMD recommends leaving it in place.

If it is necessary to disturb the asbestos as part of a renovation, remodel, repair or demolition, Cal OSHA and the Contractors State License Board require a licensed asbestos abatement contractor be used to remove the asbestos-containing material.

There are specific disposal requirements in Rule 902 for friable asbestos-containing material, including disposal at a licensed landfill. If the material is non-friable asbestos, any landfill willing to accept asbestos-containing material may be used to dispose of the material.

STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact is considered significant if the proposed project would:

- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities;
- expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials; or
- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated effects of development on hazardous materials, emergency response and aircraft crash hazards. See Chapter 6.6. Implementation of the General Plan may result in the exposure of people to hazards and hazardous materials during construction activities, and exposure of people to hazards and hazardous materials during the life of the General Plan. Impacts identified related to construction activities and operations were found to be less than significant. Policies included in the 2030 general Plan, including PHS 3.1.1 (investigation of sites for contamination) and PHS 3.1.2 (preparation of hazardous materials actions plans when appropriate) were effective in reducing the identified impacts.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Future construction activities on the project site would involve the transport of gasoline and other potentially hazardous materials to the site during construction. Relatively small amounts of commonly used hazardous substances, such as fossil fuels, lubricants, and solvents, would be used on site for construction and maintenance. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment; this impact is assessed as **less than significant**.

Question B

No structures exist on the project site, and therefore no demolition of structures potentially containing asbestos or other hazardous materials would be necessary for project construction. Refer to response to Question A above regarding the potential for the project to expose people to other hazardous materials besides asbestos during the construction period.

Once construction is complete, the transport, use, or disposal of hazardous materials would be limited to common hazardous materials typical of any residences or place of employment (e.g., cleaning agents, paints and thinners, fuels, insecticides, herbicides, etc.) and of a recovery center and/or health care facility (not specifically known at this time). Although limited quantities of hazardous materials can be found in most buildings, the use of such substances would not occur in quantities that would present a significant hazard to the environment or the public at large. Accidents or spills involving small quantities of the materials typical of any residences or place of employment (cleaning agents, paints, etc.) would not create a significant hazard to the public or the environment. Additionally, any potentially hazardous materials utilized as a part of the health care facility operations would be contained, stored and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Therefore, construction and operation of the project would not expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials; this impact is assessed as would be **less than significant**.

Question C

Groundwater was encountered in Boring D3 at a depth of about 33 feet below the ground surface. Sacramento County groundwater maps indicate that groundwater in the area is most often at depths between 25 and 40 feet below the ground surface. Although project construction requires relocation of an existing fire hydrant and the installation of other utilities within the ground, construction activities would primarily be limited to a depth of approximately 5 feet. There is no evidence to suggest that this construction action would require dewatering efforts or the introduction of contaminated groundwater to the surface; this impact would be **less than significant**.

MITIGATION MEASURES

None.

FINDINGS

All additional significant environmental effects of the project relating to hazards can be mitigated to a less than significant level.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
7. HYDROLOGY AND WATER QUALITY			
Would the project:			
A) Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project?			X
B) Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood?			X

ENVIRONMENTAL SETTING

The site is vacant and consists of highly disturbed non-native annual grasslands, and two valley oak trees (both with various types of damage) (A Better Tree Service, undated). The site is located approximately 0.5 mile north of the American River and approximately 2.7 miles east of the Sacramento River; however, the site contains no creeks, wetlands or other hydrologic features (Gibson & Skordal, 2014). The project site is in an urbanized area with many commercial and light industrial uses in the near vicinity. The project site, which is currently a vacant lot, has very little impervious surfaces; as a result, storm water is either absorbed on site or drains to the adjacent storm drain system.

The Federal Emergency Management Agency (FEMA) publishes Flood Insurance Rate Maps (FIRM) that delineate flood hazard zones for communities. The Project site is located within an area designated as Zone X. (Community Panel Number 06067 C0177H). This zone is applied to areas of 0.2 percent annual chance flood, areas of 1 percent annual chance flood with average depths of less than one foot, or with drainage areas less than one square mile, and areas protected by levees from 1 percent annual chance flood. The project site is in an area protected from the one percent annual chance (100-year) flood by levee, dike, or other structures subject to possible failure or overtopping during larger storms. FEMA does not have building regulations for development in areas designated Zone X and would not require mandatory flood insurance for structures in Zone X.

The public wastewater collection system with the City includes a combined sewer system (CSS) in the older Central City and a newer separated sewer system (sanitary sewer) in the remaining areas of the City and is the treatment service type for this project. The Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (formerly County Services District [CSD-1]) provide both collection and treatment services within their service area for the portions of the city served by the separate sewer system. Wastewater generated in this area is collected by trunk facilities in the Sacramento Area Sewer District and then conveyed via interceptors to the Sacramento Regional Wastewater Treatment Plant. The SRCSD has prepared and is implementing its master plan related to wastewater conveyance –

the Interceptor Master Plan 2000 – and the SASD is implementing its master plan – the Sewerage Facilities Master Plan Update 2006.

The community plan areas served by the City's separate sewer system include the Pocket, North Sacramento, and portions of Arden-Arcade, South Sacramento, East Sacramento, East Broadway and Airport Meadowview. The areas served by the City's separate sewer systems are divided into dozens of sewer sheds, and wastewater from the basins is pumped to the SRWTP via numerous pumping stations located throughout the City. As discussed in the Public Utilities Section (Section 6.11) of the Sacramento 2030 General Plan, pumping facilities for Basins 21, 29, 55, 119, 120, 121 and 122 in the City's separate system have recently been rebuilt. There are a variety of problems affecting the separate system including infiltration/ inflow, surcharged pipes, illegal taps, lack of facilities, and age (City of Sacramento, 2009).

The Sacramento Area Sewer District serves the community plan areas of South Natomas, North Natomas, and portions of Arcade-Arden, East Broadway, East Sacramento, Airport Meadowview and South Sacramento. The service area is divided into ten trunk sheds, which are based on the collection systems of the individual sewer districts from which CSD-1 was originally formed. For the most part, each trunk shed consists of a number of hydraulically independent systems, each discharging into the SRCSD interceptor system. According to the District's Sewerage Facilities Expansion Master Plan dated March 2002, there are capacity deficiencies in portions of the Southeast (Central), Natomas, Arden/North Highlands and Rio Linda trunk systems. The Southeast (Central) system serves the plan areas of South Sacramento, East Broadway and Airport Meadowview. The Natomas shed area includes portions of the North and South Natomas community plan areas. The Arden/North Highlands system serves the Arcade-Arden Community Plan area. The Rio Linda system is outside of the Policy Area, but within the Study Area. These areas are generally served by older sewer systems that are subject to substantial amounts of infiltration/inflow during wet weather.

Flows conveyed by the City's wastewater systems are routed to the SRWTP for treatment and disposal via an interceptor system consisting of large diameter pipes and pump stations. The interceptor system and the SRWTP, located just south of the City limits, are owned and operated by the independent SRCSD.

The City's separate storm drainage system includes conveyance of storm water and dry weather urban runoff to the adjacent creeks and rivers. The separate drainage system consists of street drains, conveyance systems, and usually a pump station to discharge into either the Sacramento or American River. These discharges are regulated for water quality by the Regional Water Quality Control Board NPDES permit R5-2002-0206.

The Stormwater Quality Improvement Plan (SQIP) (July 2007) outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management program for 2007-2011. The Program is based on the National Pollutant Discharge Elimination System (NPDES) municipal stormwater discharge permit. The comprehensive Program includes pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations. The Program also includes an extensive public education effort, target pollutant reduction strategy and monitoring program [<http://www.sacstormwater.org/>].

The Sacramento City Code Section 13.08.145 addresses mitigation of drainage impacts; design and procedures manual for water, sanitary sewer, storm drainage, and water quality facilities. The code requires that when a property contributes drainage to the storm drain system or

combined sewer system, all storm water and surface runoff drainage impacts resulting from the improvement or development must be fully mitigated to ensure that the improvement or development does not affect the function of the storm drain system or combined sewer system, and that there is no increase in flooding or in water surface elevation that adversely affects individuals, streets, structures, infrastructure, or property. These requirements will be included as conditions of project approval and development not allowed to proceed without compliance.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

The following General Plan policy would avoid or lessen environmental impacts as identified in the Master EIR and is considered a mitigation measure for the following project-level and cumulative impacts.

Impact 6.7-3: Implementation of the 2030 General Plan could increase exposure of people and/or property to risk of injury and damage from a localized 100-year flood.

and

Impact 6.7-6: Implementation of the 2030 General Plan, in addition to other projects in the watershed, could result in increased numbers of residents and structures exposed to a localized 100-year flood event.

Mitigation Measure 6.7-6 - General Plan Policy ER 1.1.5 - No Net Increase: The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100- year storm event.

STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts to hydrology and water quality may be considered significant if construction and/or implementation of the Proposed Project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the Specific Plan or
- substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 6.7 of the MEIR evaluates the potential effects of the 2030 General Plan as they relate to surface water, groundwater, flooding, stormwater and water quality. Potential effects include water quality degradation due to construction activities (Impacts 6.7-1, 6.7-2), and exposure of people to flood risks (Impacts 6.7-3, 6.7-4). Policies included in the 2030 General Plan, including a directive for regional cooperation (Policies ER 1.1.2, EC 2.1.1, EC 2.1.1), comprehensive flood management (Policy EC 2.1.14), and construction of adequate drainage facilities with new development (Policy U 4.1.1) were identified that reduced all impacts to a less-than-significant level.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Storm water runoff from the project site is either absorbed onsite or flows to the City's storm water drainage system. Construction activities associated with the proposed project would create the potential to degrade water quality from increased sedimentation and increased discharge (increased flow and volume of runoff) associated with storm water runoff. Disturbance of site soils would increase the potential for erosion from storm water. The SWRCB adopted a statewide general NPDES permit for stormwater discharges associated with construction activity. Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009- 0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation.

The City's SQIP contains a Construction Element that guides in implementation of the NPDES Permit for Storm Water Discharges Associated with Construction Activity. This General Construction Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP should contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must list BMPs the discharger will use to protect storm water runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit describes the elements that must be contained in a SWPPP. Compliance with City requirements to protect storm water inlets would require the developer to implement BMPs such as the use of straw bales, sandbags, gravel traps, and filters; erosion control measures such as vegetation and physical stabilization; and sediment control measure such as fences, dams, barriers, berms, traps, and basins. City staff also inspects and enforce the erosion, sediment and pollution control requirements in accordance with City codes (Grading, Erosion and Sediment Control ordinance).

Conformance with City regulations and permit requirements along with implementation of best management practices, construction activities under the proposed project would result in a **less than significant** impact related to storm water absorption rates, discharges, flows, and water quality.

Operation-Related Impacts

The proposed project would consist of 40 patient rooms, therapy gymnasium, commercial kitchen and scullery, dining rooms, and 64 surface parking spaces (51 standard, 11 compact, and 2 Americans with Disabilities Act [ADA] accessible spaces). The majority of the site would be covered by impervious surfaces. This would decrease storm water absorption, and increase storm water discharges and flows, with the potential to violate water quality standards associated with urban runoff (nonpoint-source pollutants) to storm drains.

The County of Sacramento and the cities of Sacramento, Folsom, Citrus Heights, Elk Grove, Rancho Cordova, and Galt have a joint NPDES permit (No. CAS082597) that was granted in December 2002. The permittees listed under the joint permit have the authority to develop, administer, implement, and enforce storm water management programs within their own jurisdiction. The permit is intended to implement the Basin Plan through the effective implementation of BMPs to reduce pollutants in stormwater discharges to the maximum extent practicable (MEP).

The proposed project would conform with City regulations and permit requirements as well as implement effective BMPs that reduce stormwater discharges that would result in a **less than significant** impact related to storm water absorption rates, discharges, flows, and water quality.

Question B

As described above, the project site is in an area protected from the one percent annual chance (100-year) flood by levee, dike, or other structures subject to possible failure or overtopping during larger storms (FEMA Flood Hazard Zone X). FEMA does not have building regulations for development in areas designated Zone X and would not require mandatory flood insurance for structures in Zone X. The project site is not within 50 feet of a levee, therefore would not be subject to levee setback limitations (General Plan Policy EC 2.1.7), nor would it obstruct access to levees (General Plan Policy EC 2.1.13). Additionally the General Plan includes Policy EC 2.1.3 that ensures funding to meet a minimum level of 200-year regional flood protection is obtained as quickly as possible. Future development is required to comply with Policies ECb 2.1.2, EC 2.1.3, EC 2.1.14 which require the City to maintain eligibility under the National Flood Insurance Program (NFIP) and cooperate with regional flood planning efforts, and update the City's Floodplain Management Plan.

In addition, localized flooding caused by failure of the storm drainage system, which typically results in street flooding could occur as a result of the proposed project due to increased storm water runoff. Implementation of General Plan Policy ER 1.1.5 requires that there be no net increase in storm water runoff peak flows over existing conditions associated with a 100-year storm event. Implementation of General Plan Policy U 4.1.5 requires new development proponents to submit drainage studies that adhere to City storm water design requirements and incorporate measures to prevent on- or offsite flooding (Sacramento City Code Title 13, Chapter 13.08, Article III(A)). Therefore, conformance with City regulations and permit requirements would result in a **less than significant** impact related to exposure of people and property to risks associated with a 100-year flood.

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional project-specific environmental effects relating to hydrology and water quality.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
8. NOISE Would the project:			
A) Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?		X	
B) Result in residential interior noise levels of 45 dBA L _{dn} or greater caused by noise level increases due to the project?		X	
C) Result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance?			X
D) Permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction?			X
E) Permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations?			X
F) Permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic?			X

ENVIRONMENTAL SETTING

An environmental noise study was conducted for the proposed project and is attached as Appendix F (J.C. Brennan Associates 2014). The existing noise environment in the project area is defined primarily by the traffic on State Route 160. Although traffic occurs on Expo Parkway and Leisure Lane, it is not a significant contributor to the overall noise environment (J.C. Brennan Associates 2014). In addition, the Red Lion Woodlake and Conference Center has a cooling tower adjacent to the southeast corner of the project site and has been identified as a potential noise source which may affect the project.

Existing Noise Receptors

Some land uses are considered more sensitive to ambient noise levels than others. Land uses often associated with sensitive receptors generally include residences, schools, libraries and hospitals. Noise-sensitive land uses are typically given special attention in order to achieve protection from excessive noise. Sensitivity is a function of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities involved. The primary noise-sensitive land use in the vicinity of the project site is the Red Lion Woodlake and Conference Center located to the east of the project.

Existing Ambient Daytime Noise Levels

The project site is located in an urban environment, which is subject to noise from traffic corridors, trucks, and other noise sources typical of an urban noise environment.

To generally quantify existing ambient noise levels in the project vicinity, a continuous (24-hour) and a short-term ambient noise measurement were conducted at the project site. The ambient noise measurement locations are shown in the noise assessment study (J.C. Brennan Associates 2014). The short-term measurement conducted on the site was conducted near the cooling tower for the Red Lion Woodlake and Conference Center that is located adjacent to the project boundary. The measured noise level was 55 A-weighted decibels (dB) L_{eq} (J.C. Brennan Associates 2014), where L_{eq} is the equivalent steady-state noise level or energy-averaged sound level over a stated period of time (i.e., average noise level) and A-weighted decibels are a frequency-dependent weighting of sound levels that better represent human perception of noise. A long-term (24-hour) measurement was collected at the southwest corner of the project site; the primary source of noise was traffic noise from State Route 160. The noise composite 24-hour average noise level (L_{dn}) at the long-term measurement site was 61 dBA L_{dn} . Note that the L_{dn} metric is the 24-hour L_{eq} with a 10-dB penalty applied during the noise-sensitive hours from 10 p.m. to 7 a.m., which are typically when sleeping occurs. More details about the ambient noise level measurements conducted on the project site are available in Appendix F.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

The following General Plan policies would avoid or lessen environmental impacts as identified in the MEIR and are considered mitigation measures for the following project-level and cumulative impacts.

Impact 6.8-4: Implementation of the 2030 General Plan could permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction.

Impact 6.8-9: Implementation of the 2030 General Plan could result in cumulative construction vibration levels that exceed the vibration-peak-particle velocities greater than 0.5 inches per second.

General Plan 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.

Impact 6.8-5: Implementation of the 2030 General Plan could permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations.

Impact 6.8-10: Implementation of the 2030 General Plan could result in cumulative impacts on adjacent residential and commercial areas being exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations.

General Plan Policy EC 3.1.6 – Vibration Screening Distances: The City shall require new residential and commercial projects located adjacent to major freeways, hard rail lines, or light rail lines to follow the Federal Transit Administration (FTA) screening distance criteria.

Impact 6.8-6: Implementation of the 2030 General Plan could permit historic buildings and archeological sites to be exposed to vibration-peak-particle velocities greater than 0.25 inches per second due to project construction, highway traffic, and rail operations.

General Plan Policy EC 3.1.7 – Vibration: The City shall require an assessment of the damage potential of vibration-induced construction activities, highways, and rail lines in close proximity to historic buildings and archeological sites and require all feasible mitigation measures be implemented to ensure no damage would occur.
Standards of Significance

For purposes of this Initial Study, impacts due to noise may be considered significant if construction and/or implementation of the proposed project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases;
- result in residential interior noise levels of 45 dBA L_{dn} or greater caused by noise level increases due to the project;
- result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance;
- permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction;
- permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations; or
- permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the potential for development under the 2030 General Plan to increase noise levels in the community. New noise sources include vehicular traffic, aircraft, railways, light rail and stationary sources. The general plan policies establish exterior (Policy EC 3.1.1) and interior (EC 3.1.3) noise standards. A variety of policies provide standards for the types of development envisioned in the general plan. See Policy EC 3.1.8, which requires new mixed-use, commercial and industrial development to mitigate the effects of noise from operations on adjoining sensitive land use, and Policy 3.1.9, which calls for the City to limit hours of operations

for parks and active recreation areas to minimize disturbance to nearby residences. Notwithstanding application of the general plan policies, noise impacts for exterior noise levels (Impact 6.8-1) and interior noise levels (Impact 6.8-2), and vibration impacts (Impact 6.8-4) were found to be significant and unavoidable.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Generation of Stationary-Source Noise

The project proposes to construct a single-story surgical and stroke recovery center and short-term skilled nursing facility, and operational noise sources for such a facility would typically include heating, ventilation, and air conditioning (HVAC) equipment. Stationary noise sources are regulated by the exterior noise limits contained within the City municipal code. Section 8.68.060 of the code states that the exterior noise limit at the property boundary for residential property is 55 dBA during the daytime period (7:00 a.m. to 10:00 p.m.) and 50 dBA during the nighttime period (10:00 p.m. to 7:00 a.m.) at the property line of noise-sensitive uses. Compliance with the noise is mandatory, and would reduce any potential impacts to neighboring uses to **less than significant** levels.

Exterior Exposure to Stationary-Source Noise

The primary off-site stationary noise source that would affect the proposed noise-sensitive uses on the project site is the cooling tower associated with the Red Lion Woodlake and Conference Center adjacent to the southeast corner of the project site.

The City of Sacramento Noise Control Ordinance (Chapter 8.68) establishes noise level standards for stationary noise sources associated with the project, or which may affect the project site. The standards are 55 dBA during the daytime period (7:00 a.m. to 10:00 p.m.) and 50 dBA during the nighttime period (10:00 p.m. to 7:00 a.m.). The standards apply at the property line of noise-sensitive uses. Based upon noise measurements conducted at the Red Lion Woodlake and Conference Center cooling tower, the predicted noise levels on the project site at a distance of 30 feet from the property line boundary is 55 dBA; this noise level would be louder at closer distances to the edge of the property line and the cooling tower. Although the majority of the project site would be shielded from Red Lion Hotel activities by the building façade, this noise level is in excess of the City's 50 dBA nighttime noise limits; this would be a **significant** impact. Implementation of Mitigation Measure NOI-1 would reduce this impact to a less than significant level.

Generation of Traffic Noise

Operation of the project would result in a minor increase in vehicle trips and associated increases in traffic noise levels along roadways in the project area. Based upon information gathered by the Institute of Transportation Engineers (ITE) *Trip Generation, 9th Edition*, the proposed project is expected to generate 17 trips during AM peak hour, 23 trips during PM peak hour, and 240 daily trips.

The ADT for the portion of State Route 160 that is located 0.7 mile north of the site is estimated to be 45,900 ADT from the City of Sacramento 2035 General Plan MEIR. It generally takes a doubling of traffic to result in an increase of 3 dB of roadway traffic noise; a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dB increase in sound would generally be perceived as barely detectable by the human ear. According to General Plan policy 3.1.2 (Exterior Incremental Noise Standards) mitigation is only required for development that increase existing noise levels by more than 2 dB in areas with noise levels between 60 L_{dn} and 65 L_{dn} . The project's minor contribution of 240 ADT would not lead to a 2 dB increase on a roadway carrying approximately 46,000 ADT. Therefore, the project traffic addition to the nearby segment of State Route 160 would result in a **less than significant** impact to off-site noise sensitive land uses.

Because the project would not increase traffic levels to the extent that new noise impacts would be created (and affect off-site noise sensitive land uses), impacts related project-generated increases in traffic volumes in the project area would be a **less than significant**.

Exterior Exposure to Traffic Noise

Traffic volumes for Cumulative + Project conditions for State Route 160 (SR 160) were obtained from the City of Sacramento 2035 General Plan MEIR. Truck usage on the area roadways were estimated from field observations and file data. Traffic noise levels for Cumulative + Project conditions for State Route 160 were modeled with the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA RD- 77-108) (J.C. Brennan Associates, 2014). Detailed traffic noise modeling and output results are provided in Appendix F.

As discussed in the noise assessment for the project, traffic noise levels at the project site would be 64 dB L_{dn} ; the project will therefore comply with the exterior noise level standard of 70 dB L_{dn} . Therefore, exterior traffic noise impacts to the project site would be a **less than significant**.

Question B

Interior Exposure to Stationary-Source Noise

Even without implementation of Mitigation Measure NOI-1, which requires that a noise control wall be installed on to address noise from the cooling tower operating at the Red Lion Woodlake and Conference Center, the noise levels generated by the cooling tower would result in exterior noise levels of approximately 55 dBA Leq at the nearest residences proposed on the project site. Typical interior-to-exterior noise level reductions would provide a minimum of 25 dBA reduction with the windows closed; considering the exterior noise level of approximately 55 dBA Leq, interior noise levels would be much less than the interior noise level standard of 45 dBA L_{dn} . However, should project windows remain open, interior noise levels could be in excess of the 45 dBA L_{dn} standard. This would be a potentially **significant** impact; Implementation of Mitigation Measure NOI-2 would reduce this impact to a less than significant level.

Interior Exposure to Traffic Noise

According to the noise assessment for the project, exterior traffic noise levels at the project site would be 64 dB L_{dn} . Given that new residential buildings typically provide an exterior-to- interior noise level reduction of 25 dB, traffic noise levels generated on area roadways would not result in interior noise levels exceeding 45 dB L_{dn} interior noise standard established by the City of Sacramento General Plan Noise Element. This impact would be **less than significant**.

Question C

Noise from construction activities for the proposed project would add to the noise environment in the immediate project vicinity. Activities involved in typical construction would generate maximum noise levels, ranging from 80 to 89 dB at a distance of 50 feet. Construction noise is considered temporary (anticipated to occur over a period of six months for the proposed project), and construction activities would be required to comply with City construction noise requirements and hours of operation

Title 8 – Health and Safety, Chapter 8.68 of the City’s municipal code 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 a.m. and 6 p.m. Monday through Saturday, and between the hours of 9 a.m. and 6 p.m. on Sunday. All construction equipment and truck deliveries would occur during the daytime hours exempt by the City of Sacramento noise ordinance (7:00 a.m. to 6:00 p.m. Monday through Saturday and from 9:00 a.m. to 6:00 p.m. on Sunday). Compliance with the proposed General Plan policies and the restriction of construction noise as outlined in the City’s Noise Ordinance contained would reduce the severity of construction noise from development under the proposed General Plan; this impact would be **less than significant**.

Question D

Generation of construction-related ground-borne vibration would primarily occur during construction of the utility connections and project building. Pile driving is one of the main sources of vibration that can occur during the construction process for a project; however, no pile driving would be necessary for construction of the proposed project. For projects of this size, a vibratory roller may be utilized for foundation or on-site driveway construction. A vibratory roller creates approximately 0.210 inches per second PPV at 25 feet, according to the Transportation and Construction Vibration Guidance Manual (Caltrans 2013). The nearest noise sensitive land use is located about 25 feet from the project boundary (Red Lion Woodlake and Conference Center); as vibration levels at this distance would be a maximum of 0.210 inches per second PPV, and as this is below the City’s 0.5 inches per second PPV threshold, impacts related to excessive ground-borne vibration due to project construction would be **less than significant**.

Question E

According to the to the Federal Transit Administration’s Transit Noise and Vibration Impact Assessment guidance, vibration impacts related to railroads must be assessed if a project is located within 200 feet of a conventional commuter railroad or rail rapid transit, or 150 feet of a light rail transit (FTA, 2006). No rail lines or transit stations of any type are located within these distances of the proposed project boundary; traffic along State Route 160, which is also more than 200 feet away (over 400 feet away), would not cause perceptible vibration at the project site. Impacts related to vibration from rail operations or highway traffic are assessed as **less than significant**.

Question F

As stated in the response to Question D, if a vibratory roller is utilized during project construction, it would generate a maximum vibration level of approximately 0.210 in/sec PPV at

a distance of 25 feet. There are no historic buildings or archaeological sites located in close proximity to the project site; surrounding land uses include the Johnston Business Park (which is comprised of various industrial and commercial businesses), two health care facilities (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center), the Red Lion Woodlake and Conference Center, and commercial uses (such as a Costco and other retail stores). As there are no historic buildings or archaeological sites within close proximity to the project site, project-related construction would not expose any historic buildings or known archaeological sites to vibration levels that exceed a peak particle velocity of 0.20 inches per second; this impact would be **less than significant**.

MITIGATION MEASURES

Mitigation Measure NOI-1: The project shall ensure that noise levels on site are reduced to less than significant levels by including the installation of a sound wall constructed along the eastern perimeter of the project site, adjacent to the Red Lion Woodlake and Conference Center cooling tower, to a height equal to the top of the cooling tower; the wall shall extend along the project east property line to a point 10 feet past the hotel south building facade, as shown on Figure 3.

Mitigation Measure NOI-2: The project shall include the installation of air conditioning so that residents and people occupying the facility can close windows and doors to ensure the appropriate acoustical isolation is present.

Findings

With implementation of Mitigation Measure NOI-1 and NOI-2, all additional significant environmental effects of the project relating to noise can be mitigated to a **less than significant** level.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>9. <u>PUBLIC SERVICES</u></p> <p>Would the project result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2030 General Plan?</p>			X

Environmental Setting

The project site is located in the City of Sacramento and is served with fire protection, police protection, and parks by the City of Sacramento. The North Area Substation William J. Kinney Police Facility located at 3550 Marysville Boulevard (approximately 4.25 miles from the project site), is the police station that currently provides police protection service to the project site vicinity. With regard to fire protection, the project vicinity area is served by city fire stations 19, 20, and 14 (located between 1.3 and 1.8 miles from the project site).

The project is located in the North Sacramento School District (Twin Rivers Unified School District). The District serves 21 elementary schools, 7 grade K-8 schools, 6 middle schools, and 6 high schools, along with 5 charter schools (both elementary and middle school grades), and 7 alternative and/or technical high, middle and pre-K schools.

STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2030 General Plan.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the potential effects of the 2030 General Plan on various public services. These include parks (Chapter 6.9) and police, fire protection, schools, libraries and emergency services (Chapter 6.10).

The general plan provides that adequate staffing levels for police and fire are important for the long-term health, safety and well-being of the community (Goal PHS 1.1, PHS 2.1). The MEIR concluded that effects would be less than significant.

General plan policies that call for the City to consider impacts of new development on schools (see, for example, Policy ERC 1.1.2 setting forth locational criteria, and Policy ERC 1.1.5 that encourages joint-use development of facilities) reduced impacts on schools to a less-than-significant level. Impacts on library facilities were also considered less than significant (Impact 6.10-8).

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Question A

The proposed project would intensify existing development in the project area by adding a recovery center and short-term skilled nursing facility; however, the project would not result in increased demand for fire protection, police protection, or school facilities, beyond that which was analyzed in the City's General Plan MEIR because the project is consistent with the City's General Plan and won't require any changes to the existing zoning. Additionally, the project would not result in an increase in school-aged children in the project vicinity. Therefore, consistent with the MEIR's conclusions, implementation of the proposed project would result in a **less than significant** impact related to fire protection services, police protection service, and school facilities.

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional project-specific environmental effects relating to public services.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
10. RECREATION Would the project:			
A) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?			X
B) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2030 General Plan?			X

ENVIRONMENTAL SETTING

The proposed project is located in close proximity to the Johnston Business Park (which includes various industrial and commercial businesses), and two health care facilities to the southeast (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center). Additionally, the Red Lion Woodlake and Conference Center (hotel and conference center) is located immediately to the east. Discovery Park is located west of the site (across Lincoln highway from the project site) and open space associated with the American River Parkway is approximately 0.1 mile south of the project site. There are generally no residential land uses in the areas surrounding the project site.

STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts to recreational resources are considered significant if the proposed project would do either of the following:

- cause or accelerate substantial physical deterioration of existing area parks or recreational facilities; or
- create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2030 General Plan.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 6.9 of the MEIR considered the effects of the 2030 General Plan on the City's existing parkland, urban forest, recreational facilities and recreational services. The General Plan identified a goal of providing an integrated park and recreation system in the City (Goal ERC 2.1). New residential development will be required to dedicate land, pay in-lieu fees or otherwise contribute a fair share to the acquisition and development of parks and recreation facilities. (Policy ERC 2.2.4) Impacts were considered less than significant after application of the applicable policies. (Impacts 6.9-1 and 6.9-2)

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None required.

ANSWERS TO CHECKLIST QUESTIONS

Question A and B

As the project does not propose new residential land uses that would create a need for additional recreational and park facilities, the project would not cause or accelerate substantial physical deterioration of existing area parks or recreational facilities. Additionally, the project would not create a need for the construction or expansion of recreational facilities beyond what was anticipated in the 2030 General Plan. Impacts related to recreational facilities would be **less than significant**.

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional project-specific environmental effects relating to recreation.

Issues:	Effect remains significant with all identified mitigation	Effect can be mitigated to less than significant	No additional significant environmental effect
11. <u>TRANSPORTATION AND CIRCULATION</u>			
Would the project:			
A) Roadway segments: degrade peak period Level of Service (LOS) from A,B,C or D (without the project) to E or F (with project) or the LOS (without project) is E or F, and project generated traffic increases the Volume to Capacity Ratio (V/C ratio) by 0.02 or more.			X
B) Intersections: degrade peak period level of service from A, B, C or D (without project) to E or F (with project) or the LOS (without project) is E or F, and project generated traffic increases the peak period average vehicle delay by five seconds or more.?			X
C) Freeway facilities: off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway; project traffic increases that cause any ramp's merge/diverge level of service to be worse than the freeway's level of service; project traffic increases that cause the freeway level of service to deteriorate beyond level of service threshold defined in the Caltrans Route Concept Report for the facility; or the expected ramp queue is greater than the storage capacity?			X
D) Transit: adversely affect public transit operations or fail to adequately provide for access to public?			X
E) Bicycle facilities: adversely affect bicycle travel, bicycle paths or fail to adequately provide for access by bicycle?			X
F) Pedestrian: adversely affect pedestrian travel, pedestrian paths or fail to adequately provide for access by pedestrians?			X

ENVIRONMENTAL SETTING

The proposed project site is bordered by Leisure Lane to the north, Expo Parkway to the west and south, and existing development to the east within the City. State Route 160 is located approximately 0.7 mile to the north of the project site.

Based upon information gathered by the Institute of Transportation Engineers (ITE) *Trip Generation, 9th Edition* the development is expected to generate 17 trips during AM peak hour, 23 trips during PM peak hour, and 240 daily trips. It should be noted that this is a conservative estimate and actual traffic volumes associated with the project would likely be much lower since this facility will have two specialty equipped private vans to transport patients.

The speed limit along Leisure Lane at the project site is 30 miles per hour (mph). Expo Parkway immediately west of the Project site, does not have a posted speed limit but it has a posted advisory speed for the curved portion of the roadway of 10 miles per hour.

It should also be noted that the proposed project was accounted for in the City's General Plan, and MEIR, and the project is consistent with the General Plan land use designation.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

The following General Plan policy would avoid or lessen environmental impacts as identified in the MEIR and is considered a mitigation measure for the following project-level and cumulative impacts.

Impact 6.12-1: Implementation of the 2030 General Plan could result in roadway segments located within the Policy Area that do not meet the City's current Level of Service (LOS) standard or the LOS D – E goal.

and

Impact 6.12-8: Implementation of the 2030 General Plan could result in a cumulative increase in traffic that would adversely impact the existing LOS for City roadways.

Mitigation Measure 6.12-1 - General Plan Policy M 1.2.2 - LOS Standard: The City shall allow for flexible Level of Service (LOS) standards, which will permit increased densities and mix of uses to increase transit ridership, biking, and walking, which decreases auto travel, thereby reducing air pollution, energy consumption, and greenhouse gas emissions.

a. Core Area Level of Service Exemption LOS F conditions are acceptable during peak hours in the Core Area bounded by C Street, the Sacramento River, 30th Street, and X Street. If a Traffic Study is prepared and identifies a LOS impact that would otherwise be considered significant to a roadway or intersection that is in the Core Area as described above, the project would not be required in that particular instance to widen roadways in order for the City to find project conformance with the General Plan. Instead, General Plan conformance could still be found if the project provides improvements to other parts of the citywide transportation system in order to improve transportation-system-wide roadway capacity, to make intersection improvements, or to enhance non-auto travel modes in furtherance of the General Plan goals. The improvements would be required within the project site vicinity or within the area affected by the project's vehicular traffic impacts. With the provision of such other transportation infrastructure improvements, the project would not be required to provide any mitigation for vehicular traffic impacts to road segments in order to conform to the General Plan. This exemption does not affect the implementation of previously approved roadway and intersection improvements identified for the Railyards or River District planning areas.

b. Level of Service Standard for Multi-Modal Districts The City shall seek to maintain the following standards in the Central Business District, in areas within 1/2 mile walking distance of light rail stations, and in areas designated for urban scale development (Urban Centers, Urban Corridors, and Urban Neighborhoods as designated in the Land Use and Urban Form Diagram). These areas are characterized by frequent transit service, enhanced pedestrian and bicycle systems, a mix of uses, and higher-density development.

- Maintain operations on all roadways and intersections at LOS A-E at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. LOS F conditions may be acceptable, provided that provisions are made to improve the overall system and/or promote non-vehicular transportation and transit as part of a development project or a City-initiated project.

c. Base Level of Service Standard the City shall seek to maintain the following standards for all areas outside of multi-modal districts.

- Maintain operations on all roadways and intersections at LOS A-D at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. LOS E or F conditions may be accepted, provided that provisions are made to improve the overall system and/or promote non-vehicular transportation as part of a development project or a City-initiated project.

d. Roadways Exempt from Level of Service Standard The above LOS standards shall apply to all roads, intersections or interchanges within the City except as specified below. If a Traffic Study is prepared and identifies a significant LOS impact to a roadway or intersection that is located within one of the roadway corridors described below, the project would not be required in that particular instance to widen roadways in order for the City to find project conformance with the General Plan. Instead, General Plan conformance could still be found if the project provides improvements to other parts of the city wide transportation system in order to improve transportation-system-wide roadway capacity to make intersection improvements, or to enhance non-auto travel modes in furtherance of the General Plan goals. The improvements would be required within the project site vicinity or within the area affected by the project's vehicular traffic impacts. With the provision of such other transportation infrastructure improvements, the project would not be required to provide any mitigation for vehicular traffic impacts to the listed road segment in order to conform to the General Plan.

- 12th/14th Avenue: State Route 99 to 36th Street
- 24th Street: Meadowview Road to Delta Shores Circle
- 65th Street: Folsom Boulevard to 14th Avenue
- Alhambra Boulevard: Folsom Boulevard to P Street
- Arcade Boulevard: Marysville Boulevard to Del Paso Boulevard
- Arden Way: Capital City Freeway to Ethan Way
- Blair Avenue/47th Avenue: S. Land Park Drive to Freeport Boulevard
- Broadway: 15th Street to Franklin Boulevard
- Broadway: 58th to 65th Streets
- El Camino Avenue: Stonecreek Drive to Marysville Boulevard
- El Camino Avenue: Capitol City Freeway to Howe Avenue

- Elder Creek Road: 65th Street to Power Inn Road
- Florin Perkins Road: 14th Avenue to Elder Creek Road
- Florin Road: Greenhaven Drive to 1-5; 24th Street to Franklin Boulevard
- Folsom Boulevard: 34th Street to Watt Avenue
- Freeport Boulevard: Broadway to Seamas Avenue
- Fruitridge Road: Franklin Boulevard to SR 99
- Garden Highway: Truxel Road to Northgate Boulevard
- Howe Avenue: American River Drive to Folsom Boulevard
- J Street: 43rd Street to 56th Street
- Mack Road: Meadowview Road to Stockton Boulevard
- Martin Luther King Boulevard: Broadway to 12th Avenue
- Marysville Boulevard., 1-80 to Arcade Boulevard
- Northgate Boulevard: Del Paso Road to SR 160
- Raley Boulevard: Bell Avenue to 1-80
- Roseville Road: Marconi Avenue to 1-80
- Royal Oaks Drive: SR 160 to Arden Way
- Truxel Road: 1-80 to Gateway Park

The project is located within an area that the Base Area Level of Service and LOS standard will be implemented. Therefore, operations on all roadways and intersections at shall be maintained at LOS A-D at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. LOS E or F conditions may be accepted, provided that provisions are made to improve the overall system and/or promote non-vehicular transportation as part of a development project or a City-initiated project.

STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts resulting from changes in transportation or circulation may be considered significant if construction and/or implementation of the proposed project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

Roadway Segments

- the traffic generated by a project degrades peak period Level of Service (LOS) from A,B,C or D (without the project) to E or F (with project) or
- the LOS (without project) is E or F, and project generated traffic increases the Volume to Capacity Ratio (V/C ratio) by 0.02 or more.

Intersections

- the traffic generated by a project degrades peak period level of service from A, B, C or D (without project) to E or F (with project) or
- the LOS (without project) is E or F, and project generated traffic increases the peak period average vehicle delay by five seconds or more.

Freeway Facilities

Caltrans considers the following to be significant impacts.

- off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway;
- project traffic increases that cause any ramp's merge/diverge level of service to be worse than the freeway's level of service;
- project traffic increases that cause the freeway level of service to deteriorate beyond level of service threshold defined in the Caltrans Route Concept Report for the facility; or
- the expected ramp queue is greater than the storage capacity.

Transit

- adversely affect public transit operations or
- fail to adequately provide for access to public transit.

Bicycle Facilities

- adversely affect bicycle travel, bicycle paths or
- fail to adequately provide for access by bicycle.

Pedestrian Circulation

- adversely affect pedestrian travel, pedestrian paths or
- fail to adequately provide for access by pedestrians.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Transportation and circulation were discussed in the MEIR in Chapter 6.12. Various modes of travel were included in the analysis, including vehicular, transit, bicycle, pedestrian and aviation components. The analysis included consideration of roadway capacity and identification of levels of service, and effects of the 2030 General Plan on the public transportation system. Provisions of the 2030 General Plan that provide substantial guidance include Goal Mobility 1.1, calling for a transportation system that is effectively planned, managed, operated and maintained, promotion of multimodal choices (Policy M 1.2.1), identification of level of service standards (Policy M 1.2.2), development of a fair share funding system for Caltrans facilities (Policy M 1.5.6) and development of complete streets (Goal M 4.2).

While the General Plan includes numerous policies that direct the development of the City's transportation system, the MEIR concluded that the general plan development would result in significant and unavoidable effects (see Impacts 6.12-1, 6.12-8 (roadway segments in the City), Impacts 6.12-2, 6.12-9 (roadway segments in neighboring jurisdictions), and Impacts 6.12-3, 6.12-10 (freeway segments)).

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None.

ANSWERS TO CHECKLIST QUESTIONS

Questions A and B

The proposed project was accounted for in the City's General Plan, and MEIR, and the project is consistent with the General Plan land use designation. Once completed, the project will generate additional trips on the road network. The anticipated trip generation from the project is estimated as 17 hourly vehicle trips during the morning peak hours (7:00-9:00 AM), 23 hourly vehicle trips during the afternoon peak hour(4:00-6:00 PM), and 240 daily trips

The project is included in the entire State Route 160 (SR 160) Corridor Development Project, which consists of future developments of over twenty parcels along the SR 160 Corridor. The ultimate project built-out is estimated in the year 2022. A traffic impact study prepared in November 2000 by DKS Associates for the project (*Traffic Study of Potential Development in the SR 160 Corridor- North Sacramento*) indicates that the ultimate build-out of the entire SR 160 will create significant environments impacts and cause severe degrading of level of service (LOS) for the roadway systems in the project vicinity. The DKS traffic study identified necessary roadway improvements as the required mitigation measures to minimize the environmental impacts of the proposed developments along the SR160 Corridor. The following is required improvements that are most closely related to Advanced Health Care of Sacramento project:

- A traffic signal installation at the intersection of Canterbury Road/Expo Parkway and Leisure Lane/ Slobe Avenue;

Since the current project is consistent with the land uses designated for the project site as reflected in the City of Sacramento General Plan, and is part of the entire SR 160 Corridor Developments, mitigations are thus required as the conditions of project development to alleviate the potential environmental impacts of the project. A fair share contribution (to be determined by the City) based on overall trip generation of the project site will be required as a condition of approval of the proposed project. Impacts to traffic are anticipated to be **less than significant**.

Question C

As mentioned above for questions A and B, the proposed project was accounted for in the City's General Plan, and MEIR, and the project is consistent with the General Plan land use designation. State Route 160 is located approximately 0.7 miles north of the project site; the only segment of State Route 160 that was assessed in the MEIR was State Route 160 between Tribute Road and Business 80, which is located east of the project site. According to the MEIR, this freeway segment currently operates at LOS C. The proposed project and the associated 23 maximum peak-hour trips (see response to Questions A and B) would not affect the freeway ramp queue, or reduce the LOS of this freeway ramp; impacts related to freeway facilities would be **less than significant**.

Question D

The project area is served by a fully developed roadway system of arterial and local streets. Existing roadway, pedestrian, and public-transit infrastructure would remain in place and as currently designed and the project would not substantially change the existing movement of persons and traffic through the project area. The proposed project is anticipated to result in the addition of visitors to the site, mostly in the form of employees and patients; some of whom

would travel by transit. As described for Questions A and B, a maximum of 23 in-bound and out-bound peak hour trips could be expected with the proposed project. Some may use transportation, but it is not expected that the majority would do so as there are no bus or transit stations within 0.5 mile of the project. Further, as the proposed project was accounted for in the City's General Plan, and MEIR, and as the project is consistent with the General Plan land use designation, the proposed project is not expected to adversely affect public transit operations, or fail to adequately provide for access to public transit. As such, the proposed project's impacts to transit facilities are considered to be **less than significant**.

Questions E and F

The proposed project site plan features numerous pedestrian access points and pedestrian access features with opportunities for pedestrians to access the site from surrounding streets and other parts of the site. Although pedestrians may cross the driveway entrances for the parking areas associated with the facility, major conflicts between vehicles and pedestrians are not expected. The project would also comply with the City development standards and regulations, which address hazards or barriers for pedestrian or bicycle access. Public improvements required for the project will be designed to appropriate standards. Therefore, creation of hazards is not expected, and this impact is considered **less than significant**.

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional project-specific environmental effects relating to transportation and circulation.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
12. UTILITIES AND SERVICE SYSTEMS			
Would the project:			
A) Result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments?			X
B) Require or result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts?			X

ENVIRONMENTAL SETTING

Wastewater

Wastewater would be collected by the Sacramento Area Sewer District (formerly County Services District [CSD-1]), which provides collection and treatment services for some portions of the City that are served by the separate sewer system (as opposed to the combined sewer system that serves the older Central City area). Wastewater generated in this vicinity of the project is collected by trunk facilities in the Sacramento Area Sewer District and then conveyed via interceptors to the Sacramento Regional Wastewater Treatment Plant.

Stormwater

The City's separate storm drainage system includes conveyance of storm water and dry weather urban runoff to the adjacent creeks and rivers. The separate drainage system consists of street drains, conveyance systems, and usually a pump station to discharge into either a Sacramento or American River. These discharges are regulated for water quality by the Regional Water Quality Control Board NPDES permit.

Water Supply

Water service for the project would be provided by the City of Sacramento. The City provides domestic water service from a combination of surface water and groundwater sources: the American River, Sacramento River, and groundwater wells (pumped from the North and South American Subbasins). Water from the American River and Sacramento River is diverted by two water treatment plants: the Sacramento River Water Treatment Plant (SRWTP), located at the southern end of Bercut Drive approximately 2.3 miles west of the project site, and the E.A. Fairbairn Water Treatment Plant (FWTP), located at the northeast corner of State University Drive South and College Town Drive approximately 2.3 miles southwest of the project site. The FWTP and the SRWTP divert water from the American and Sacramento rivers, respectively. Water diverted from the Sacramento and American Rivers is treated, stored in storage reservoirs, and pumped to customers via a conveyance network.

The City of Sacramento complies with the California Water Code, which requires urban water suppliers to prepare and adopt Urban Water Management Plan (UWMP) every five years. The most recent UWMP was adopted in 2010, and includes an analysis of water demand sufficiency under normal, single dry year, and multiple dry year scenarios. Water supply and demand projections include future planned development under the 2030 General Plan. Based, in part, on these projections, the City possesses sufficient water supply entitlements and treatment capacity during normal, dry, and multiple dry years to meet the demands of its customers up to the year 2035. It is important to note that this assumes that wells and surface water treatment capacity will be rehabilitated and expanded as needed (City of Sacramento, 2011).

Solid Waste Disposal

Commercial solid waste materials collected by the Solid Waste Division of the City Department of Utilities are sorted at either the Sacramento Recycling and Transfer Station (owned by BLT Enterprise) or the North Area Transfer Station, owned by the County of Sacramento Public Works Department; City waste transported from the City's transfer stations is then transported to Lockwood Landfill in Lockwood, Nevada. The City of Sacramento General Plan MEIR indicates that the City landfills have sufficient capacity for full buildout of the 2030 General Plan.

Electricity and Natural Gas

The Sacramento Municipal Utility District (SMUD) is responsible for the generation, transmission, and distribution of electrical power to its 900 square mile service area, which includes most of Sacramento County and a small portion of Placer County. SMUD buys and sells energy and capacity on a short-term basis to meet load requirements and reduce costs. The Pacific Gas & Electric Company (PG&E) provides natural gas service to residents and businesses within the City of Sacramento.

STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, or school facilities beyond what was anticipated in the 2030 General Plan:

- result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments or
- require or result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts.

SUMMARY OF ANALYSIS UNDER THE 2030 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the effects of development under the 2030 General Plan on water supply, sewer and storm drainage, solid waste, electricity, natural gas and telecommunications (see Chapter 6.11).

The MEIR evaluated the impacts of increased demand for water that would occur with development under the 2030 General Plan. Policies in the general plan would reduce the impact generally to a less than significant level (see Impact 6.11-1) but the need for new water supply facilities results in a significant and unavoidable effect (Impact 6.11-2). The potential need for expansion of wastewater treatment facilities was identified as having a significant and

unavoidable effect (Impacts 6.11-4, 6.11-5). Impacts on solid waste facilities were less than significant (Impacts 6.11-7, 6.11-8). Implementation of energy efficient standards as set forth in Titles 20 and 24 of the California Code of Regulations for residential and non-residential buildings would reduce effects for energy to a less-than-significant level.

MITIGATION MEASURES FROM 2030 GENERAL PLAN MEIR THAT APPLY TO THE PROJECT

None available.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Water

The proposed project consists of single-story surgical and stroke recovery center and short-term skilled nursing facility; the facility would include 40 patient rooms, a therapy gymnasium, a commercial kitchen and scullery, and dining rooms. Although the exact number of employees at the facility is not yet known, it is estimated that there would be 17 therapists, eight certified nursing assistants, six dietary staff, three housekeepers, and 10 nurses and administrative staff. In general, approximately 38 staff will occupy the building at a given time. Assuming three shifts for a single 24-hour day (as it is proposed to be a 24-hour facility) with 38 employees per shift, approximately 114 employees would be on-site during each 24-hour period. Additionally, given that there are 40 patient rooms, approximately 40 patients will also be on site at a given time. This would yield a total of approximately 154 individuals on-site in a 24-hour period. Given that the 2010 UWMP for the City projects the annual water per capita demand for year 2015 to be 256 gallons per capita per day (gpcd) (City of Sacramento, 2011), the project could require a maximum 39,424 gallons of water per day.

The proposed project is consistent with the General Plan land use designation. The 2010 UWMP considered these projections during normal, dry, and multiple dry years. Thus, the project's water demand would be met by the city's existing water right permits and U.S. Bureau of Reclamation contract. In addition, according to the 2010 UWMP, the City's water supply would be within the City's water demand and treatment capability during a multi-dry year in 2015, 2020, 2025, 2030, and 2035. Thus, the project would have a **less than significant** impact related to water supply.

Wastewater and Stormwater

As described for the water subsection of Question A, approximately 38 staff will occupy the building at a given time. Assuming three shifts for a single 24-hour day (as it is proposed to be a 24-hour facility) with 38 employees per shift, approximately 114 employees would be on-site during each 24-hour period. Additionally, given that there are 40 patient rooms, approximately 40 patients will also be on site at a given time. This would yield a total of approximately 154 individuals on-site in a 24-hour period. Using the population-based flow factor identified in Section 6.11, Public Utilities, of the MEIR of 132.4 gallons per capita per day, the project would result in an increased demand of approximately 20,390 gallons per day. This flow was accounted for in the 2030 General Plan and MEIR; therefore, this impact would be **less than significant**.

Solid Waste

The City's 2030 General Plan MEIR provides solid waste generation rates for residential and employment (retail, office, industrial uses). For residential, the solid waste generation rate is 1.1 tons per unit per year and for employment uses, it is 10.8 pounds per employee day.

As described for the water subsection of Question A, approximately 38 staff will occupy the building at a given time. If there were 3 shifts for a single 24-hour day (as it is proposed to be a 24-hour facility), and it is conservatively assumed that 38 employees would work during each shift, approximately 114 employees would be working on site during each 24-hour period. A total of 114 employees would generate 1,231 pounds per day of solid waste. This would equate to 449,315 pounds or 225 tons per year of waste from employees at the facility. Conservatively assuming that each of the patient rooms also generates 1.1 tons per year (based on the residential solid waste generation rate), an additional maximum of 44 tons per year would be generated by the facility. This would total 269 tons per year as a conservative estimate of solid waste generated by the project. Because the project is consistent with the General Plan land use designation, this increase in solid waste production would not exhaust the remaining landfill capacity and this impact would be **less than significant**.

Electricity and Natural Gas

Construction of the project would result in increased use of electricity and natural gas to support the surgical and stroke recovery center and short-term skilled nursing facility. Both utility providers would install new distribution facilities, as needed, according to California Public Utilities Commission rules. Because the increased demand in energy is evaluated in the 2030 General Plan MEIR, and because PG&E and SMUD would ensure their capability of providing an adequate level of service to the project site, this impact would be **less than significant**.

Question B

As part of the project, new onsite and offsite underground utilities would be constructed. Potential environmental effects associated with the construction of these facilities are generally discussed throughout this Initial Study in various sections including: air quality (during construction), cultural resources, hazards, noise, and traffic. With implementation of the mitigation measures listed in this document, impacts related to the construction of new utilities would be **less than significant**.

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional project-specific environmental effects relating to utilities and service systems.

MANDATORY FINDINGS OF SIGNIFICANCE

Issues:	Effect remains significant with all identified mitigation	Effect can be mitigated to less than significant	No additional significant environmental effect
13. <u>MANDATORY FINDINGS OF SIGNIFICANCE</u>			
A.) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X	
B.) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		X	
C.) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X	

Answers to Checklist Questions

Question A

As discussed in the Biological Resources, Cultural Resources, and Noise sections of this Initial Study, the proposed project would result in potentially significant impacts as a result of construction of the proposed project and would have the potential to degrade the quality of the environment. However, adoption and implementation of mitigation measures described in this Initial Study would reduce these individual impacts to less than significant levels.

Although it is unlikely that Swainson hawks, tree-nesting raptors, and migratory birds would occupy the trees on and surrounding the site given the urban nature of the area, the large and mature trees on the project site could provide potential nesting sites. If active nests are present in trees that would be removed during the raptor breeding season (February–August), mortality of eggs and chicks could result. In addition, project demolition and construction could disturb active nests by increased activity and higher than ambient noise levels near the site or in trees not yet removed from the site, potentially resulting in nest abandonment by the adults and mortality of chicks and eggs. This would be a significant impact. Implementation of Mitigation Measures BIO-1 would reduce the impact to a less than significant level. Therefore, the project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of an endangered, rare, or threatened species.

Although no documented cultural or paleontological resources are located at the project site, the potential exists to encounter previously undiscovered cultural material or paleontological resources during construction-related ground disturbing activities. However, adoption and implementation of Mitigation Measure CUL-1, CUL-2, and CUL-4 would reduce these potential impacts to less than significant levels.

No evidence suggests that any prehistoric or historic-era marked or unmarked interments are present within or in the immediate vicinity of the project site. However, there is a possibility that unmarked previously unknown graves could be present within the project site. Potential disturbance of previously undiscovered human remains during project construction would be a potentially significant impact. Implementation of Mitigation Measure CUL-3 would reduce the project's potential for disturbance of human remains to a less than significant level.

Implementation of the proposed project would subject future tenants of the skilled nursing facility to elevated noise levels associated with the cooling tower owned and operated by the adjacent Red Lion Woodlake and Conference Center property. Mitigation Measure NOI-1 ensures that noise levels on site are reduced to less than significant levels by including the installation of a sound wall constructed along the eastern perimeter of the project site to a height equal to the top of the cooling tower; the wall shall extend along the project east property line to a point 10 feet past the hotel south building facade, as shown on Figure 3. In addition, the project shall include the installation of air conditioning so that residents and people occupying the facility can close windows and doors to ensure the appropriate acoustical isolation is present as outlined in Mitigation Measure NOI-2.

Question B

Cumulative environmental effects are multiple individual effects that, when considered together, would be considerable or compound or increase other environmental impacts. Individual effects may result from a single project or a number of separate projects and may occur at the same place and point in time or at different locations and over extended periods of time. The proposed project would result in the in-fill construction and operation of a 40-room skilled nursing facility in the City and would not affect population growth either directly or indirectly beyond that which was analyzed in the City's 2030 General Plan MEIR. Implementation of the MEIR and project-specific mitigation measures proposed in this Initial Study would reduce the project's impacts to a less than significant level, further reducing the project's contribution to environmental impacts to less than cumulatively considerable.

Question C

With implementation of MEIR and project-specific mitigation measures for potential Biological Resources, Cultural Resources, and/or Noise impacts identified in this Initial Study, the project would not have a substantial adverse effect on human beings, either directly or indirectly.

SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would potentially be affected by this project.

<input type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Noise
<input type="checkbox"/> Air Quality/Greenhouse Gas	<input type="checkbox"/> Public Services
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Transportation/Circulation
<input type="checkbox"/> Geology and Soils	<input type="checkbox"/> Utilities and Service Systems
<input type="checkbox"/> Hazards	<input type="checkbox"/>
<input type="checkbox"/> Hydrology and Water Quality	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> None Identified	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

SECTION V - DETERMINATION

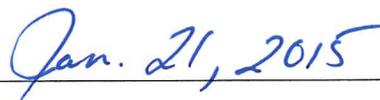
On the basis of the initial study:

I find that (a) the proposed project is an anticipated subsequent project identified and described in the 2030 General Plan MEIR; (b) the proposed project is consistent with the 2030 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the MEIR are adequate for the proposed project; and (d) the proposed project will have additional significant environmental effects not previously examined in the MEIR. A Mitigated Negative Declaration will be prepared. Mitigation measures from the MEIR will be applied to the project as appropriate, and additional feasible mitigation measures and alternatives will be incorporated to revise the proposed project before the negative declaration is circulated for public review, to avoid or mitigate the identified effects to a level of insignificance. (CEQA Guidelines Section 15178(b))

Signature



Date



Scott Johnson

Printed Name

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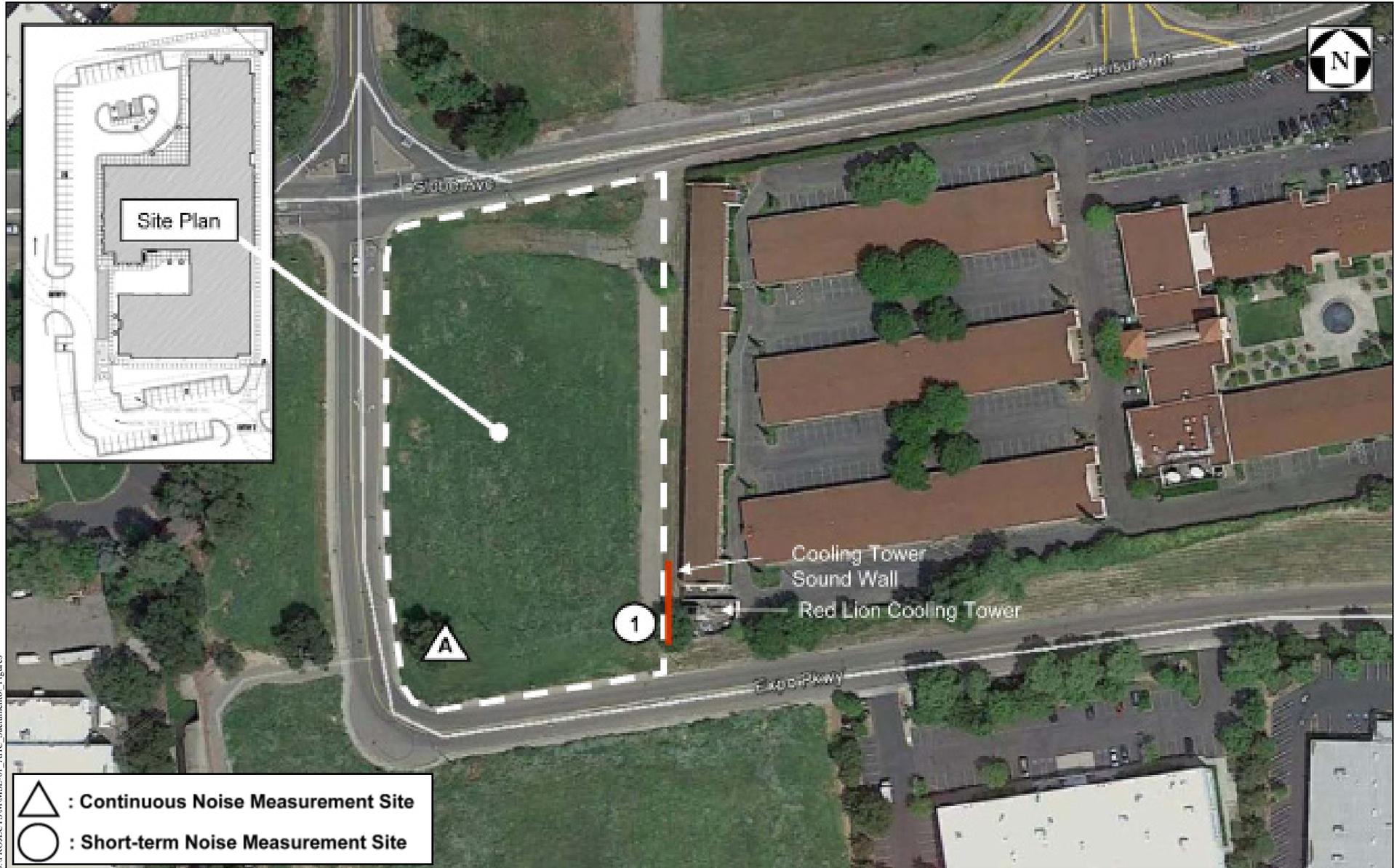
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S:\PROJECTS\MMSI-01_AHC_Sacramento\GIS\MXD\Project Site and Vicinity (north right).mxd ABC-01 04/17/13--AB



Project Site and Vicinity Map

ADVANCED HEALTH CARE OF SACRAMENTO



S:\PROJECTS\MMSL-01_AHC Sacramento_Figures

Source: J.C. Brennan and Associates

Noise Abatement Wall

ADVANCED HEALTH CARE OF SACRAMENTO

Figure 3

**IS/MND
ATTACHMENT 1**

**ADVANCED HEALTHCARE OF SACRAMENTO (PR 14-038)
PUBLIC COMMENTS &
RESPONSE TO COMMENTS
DRAFT INITIAL STUDY / MITIGATED NEGATIVE
DECLARATION**

Prepared By:

City of Sacramento

Community Development Dept.
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

In Consultation With:

HELIX Environmental Planning, Inc.

11 Natoma Street, Suite 155
Folsom, CA 95630

April 2015



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

February 24, 2015

Scott Johnson
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Subject: Advanced Health Care of Sacramento
SCH#: 2015012044

Dear Scott Johnson:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 23, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2015012044
Project Title Advanced Health Care of Sacramento
Lead Agency Sacramento, City of

Type MND Mitigated Negative Declaration
Description The project proposes the construction of a single-story, 32,106 sf surgical and stroke recovery center and short-term skilled nursing facility. Specific project elements include 40 patient rooms, therapy gymnasium, commercial kitchen and scullery, dining rooms, and 64 surface parking spaces (51 standard, 11 compact, and 2 Americans with Disabilities Act [ADA] accessible spaces). The use of ambulances and associated sirens for this facility is not anticipated. The facility would be functional 24-hours a day with an estimated total staff of 17 therapists, eight certified nursing assistants, six dietary staff, three housekeepers, and 10 nurses and administrative staff. The proposed project would require a development standards deviation due to the existence of an existing private sewer easement.

Lead Agency Contact

Name Scott Johnson
Agency City of Sacramento
Phone 916 808 5842 **Fax**
email
Address 300 Richards Blvd, 3rd Floor
City Sacramento **State** CA **Zip** 95811

Project Location

County Sacramento
City
Region
Lat / Long 38° 35' 53" N / 121° 27' 26" W
Cross Streets Leisure Lane and Expo Parkway
Parcel No. 275-0310-008
Township 9N **Range** 6E **Section** .21 **Base**

Proximity to:

Highways Hwy 80/99/160
Airports
Railways
Waterways American River
Schools Woodlake ES
Land Use GPLU: Suburban Center
Z: C-2-LI or General Commercial

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3 S; Air Resources Board; Regional Water Quality Control Bd., Region 5 (Sacramento); Native American Heritage Commission; Statewide Health Planning

Date Received 01/23/2015 **Start of Review** 01/23/2015 **End of Review** 02/23/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.



February 11, 2015

Main Office

10060 Goethe Road
Sacramento, CA 95827-3553
Tel: 916.876.6000
Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tel: 916.875.9000
Fax: 916.875.9068

Board of Directors

Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

Prabhakar Somavarapu

District Engineer

Ruben Robles

Director of Operations

Christoph Dobson

Director of Policy & Planning

Karen Stoyanowski

Director of Internal Services

Joseph Maestretti

Chief Financial Officer

Claudia Goss

Public Affairs Manager

www.srcsd.com

Scott Johnson
City of Sacramento, Community Development Department
Environmental Planning Division
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

**Subject: Notice of Availability/Intent to Adopt the Mitigated Negative Declaration for Advanced Health Care of Sacramento Project (P14-038)
APN: 275-0310-008**

Dear Mr. Johnson:

Both the Sacramento Area Sewer District (SASD) and the Sacramento Regional County Sanitation District (SRCSD) have reviewed the Notice of Availability/Intent to Approve the Draft Mitigated Negative Declaration for the subject project and have following comments.

It is noted that this project is proposing the construction of a single-story, 32,106 square foot surgical and stroke recovery center and short-term skilled nursing facility. Specific project elements include 40 patient rooms, therapy gymnasium, commercial kitchen and scullery, dining rooms, and 64 surface parking spaces. The proposed project site is located at the southeast corner of Leisure Lane and Expo Pkwy within city of Sacramento.

The subject property is outside the boundaries of the SASD but within the Urban Service Boundary and SRCSD shown on the Sacramento County General Plan. Sacramento City Utilities Department will be providing local sewage services at the site with SRCSD conveying the sewage from City collector to Sacramento Regional Wastewater Treatment Plant (SRWTP).

SRCSD sewer impact fees will be required. The applicant should contact the Sewer Fee Quote Desk at (916) 876-6100 for sewer impact fee information.

If you have any questions regarding these comments please call me at 916-876-6278, or call Amandeep Singh at 916-876-6296.

Sincerely,

Stephen Moore

Stephen Moore, P.E., M.B.A.
Development Services

B-1



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

17 February 2015

Scott Johnson
City of Sacramento
300 Richards Blvd, Third Floor
Sacramento, CA 95811

CERTIFIED MAIL
7014 2120 0001 3978 0018

**COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE
DECLARATION, ADVANCED HEALTH CARE OF SACRAMENTO PROJECT,
SCH# 2015012044, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 23 January 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Advanced Health Care of Sacramento Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

C-1

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory

C-1
cont'd

Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

If you have questions regarding these comments, please contact me at (916) 464-4684 or tcleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

C-1
cont'd

PMND – Advanced Health Care of Sacramento (P14-038)

1. Question A, p 56. “The proposed project would intensify existing development in the project area by adding a recovery center and short-term skilled nursing facility; however, the project would not result in increased demand for fire protection, police protection, or school facilities, beyond that which was analyzed in the City’s General Plan MEIR because the project is consistent with the city’s general plan and won’t require changes to the existing zoning.”

D-1

A. The demand for fire protection, police protection, and schools is not the criteria for zoning classification of a land parcel. Zoning classification is determined by land usage. The proposed “surgery and stroke recovery center” is, in fact, a 40-bed convalescent hospital with a highly-skilled nursing staff and physical therapy staff. It is residential 24/7. It will dispense pharmaceutical narcotics as pain-killers to its patients. It should require an H zoning, and pay taxes accordingly.

D-2

B. This property has undergone earlier zone changes from A to M to the current C-2 with LI and PC overlays. Where is this discussion?

D-3

C. This property, Expo Pakrway Lot 8, has been involved in two previous development schemes which went bankrupt-- Expo-Parkway Office Complex and Canterbury Crossing. These two bankruptcies generated dozens of legal filings including loan defaults and mechanic’s liens against this parcel. It was legally encumbered with Expo-Parkway Lot 3 in these bankrupt developments. What is the current legal status of this parcel? Where is this discussion?

D-4

2. Section II, p 4-5, “The proposed project would require a conditional use permit and development standards deviation due to the existence of an existing private sewer easement located in the southern portion of the property.”

D-5

Where is the discussion of the sewer easement in the PMND? Is this untreated raw sewage? Is it storm water run off? Is it the drain line from the hotel lake? What other legal or private easements encumber this parcel?

3. Section III, Population and Housing, p 6-7. The MIER 2030 General Plan does not sufficiently analyze the current sever drought conditions or the possibility of sustained or increased long-term drought. The population growth projections of MEIR are therefore unreliable and not supportable by the data.

D-6

4. Section III, Environmental Setting, p8. “State Route 160 is located approximately 0.7 mile north of the site . . .”

D-7

This statement is not correct. State Route 160 is located less than 500 ft from the site. This misstatement of fact is repeated several times in the PMND. It most seriously impacts Question G, p19, since this project would locate “residences” (convalescent

hospital beds with particularly vulnerable clients) within 500 ft of State Rt. 160. A Health Risk Assessment (HRA) is called for given this circumstance.

D-7
cont'd

5. Special-Status Wildlife, p 26 “There are no potential wetlands or waters of the United States within this site (Gibson and Skordal 2014)”

D-8

This conclusion is not supported by the evidence. The G&S report is highly flawed.

A. The soil distribution pattern of San Joaquin fine sandy loam and Columbia sandy loam indicate that the Columbia sandy loam is the historical effluvial plume deposit of Woodlake Creek. Fig. 2, Soils Map of the G&S Report demarcates the boundary line of these two soil types on a diagonal arc across this parcel. This boundary indicates the former extent of the riparian wetlands of Woodlake Creek. The Columbia sandy loam is a riverine deposit built up over many centuries prior to 1930 and the subsequent drainage and denigration of Woodlake Creek. The claim that there are no “potential” wetlands or waterways is false both for the future and in the recent historical past. The Jurisdictional Findings of the G&S Report regarding waters/wetlands are flawed. The Wetland Determination Data Form upon which this finding is based has been superficially performed. This is bad science.

D-9

B. The G&S Report does not include a seed bank inventory. At the time of data collection by G&S, the report notes the prevalence of non-native grasses. At present, following winter rains, the site is covered by native vetch, thistle, dandelion and sweet pea which is a different habitat than the one describe in the report.

D-10

C. The site has been regularly disked by the owner, North Sac Land Co. This land management practice has disrupted the native plant and animal habitat. Elderberry bushes did exist at this site within recent memory, and were deliberately eradicated by the owner, thus destroying elderberry beetle habitat. Elderberry seeds exist in the seed bank and would return if the current land management practices were discontinued.

D-11

D. The habitat assessment includes only special-status animal species, that is, animals on the verge of extinction due to habitat destruction by human agency. There are many other animals which range across this site which I have personally observed, including jack rabbit, turkey, deer, coyote, skunk, raccoon, vole, rat, pheasant, possum, feral cat, gopher, and pigeon. While these animals are often grouped as varmint, their habitat deserves protection to keep them off the special status list. Restoration of the pre-1930 riparian habitat of this land is a much better land use option than this proposed development.

D-12

6. Cultural Resources, p 33 “The project site is a vacant lot has not been previously developed.” This statement is false.

D-13

A. This site was included in two previous bankrupted development schemes, Expo-Parkway Office Complex and Canterbury Crossing. This parcel has previously been

D-14

graded, staked, and regularly disked, and includes improvements of sidewalks, fire hydrants, and adjacent paved roadbeds with underground utilities.	D-14 cont'd
B. The Cultural Resources Assessment by Peak & Assoc fails to note that the pre-1930 Marysville Road from the north embarkation of Sutter's Landing likely traversed this site.	D-15
7. Hydrology, p 44. The discussion in this section in regards to storm run off and flood risk to adjacent residential properties is highly flawed. The build out of AHC will roof and pave 80% of 2.05 ac. = 1.65 ac. In the event of a storm surge which drops 3 in. of rain on Woodlake Neighborhood in 30 minutes, this site will need to shed .5 acre foot of water. This water will be dumped into the Woodlake storm runoff catchment system down flow from Woodlake residential neighborhood (and the bottleneck culvert under SR 160), thereby backing up water into the residential neighborhood. Parts of Woodlake neighborhood such as Baxter Rd. are already poorly engineered for runoff drainage. Build out of this site presents an eminent flood risk to residents in Woodlake neighborhood. There should be an on-site catchment basin for this facility. There should be permeable materials used for parking lot paving to allow surface water absorption.	D-16
A. Sump 151 drains a 1000 ac. drainage basin. What is the wisdom of building a convalescent hospital with 40 residents with limited mobility at the lowest point of this basin? Why isn't this facility required to be elevated six feet? And waterproofed construction up to six feet?	D-17
8. Transportation and Circulation, Questions A, B, C, p 66. The calculation used for vehicle trips/peak hours is flawed.	D-18
A. The list of employees on p 4 is confused and adds up to 44 staff per shift. The number 38 employees per shift is claimed "in general." Staff designations such as "doctor," "pharmacist," "orderly," "van driver," or "administrator" are not listed. If there are three shifts per 24 hrs.-- day, swing, and graveyard-- and there is no public transportation near by, and it is presumed that each employee commutes by private vehicle, then each shift change will generate 38 arrival vehicle trips per hour and 38 departure VTH, for a total of 76 VTH at peak commute hours, not 17 VTH as stated in the PMND.	D-19
B. It is likely that the day shift will have more employees on site than either swing or graveyard which will impact VTH both at morning and evening peak commute hours.	D-20
C. Visitors will visit more frequently during day and swing shifts. Is the proposed number of parking spaces (61) sufficient for shift change and for visitors?	D-21
D. Will on-street parking become normal at this intersection? There is currently no on-street parking at any of the four streets of the intersection -- Leisure Lane, Slobe Ave., Expo-Parkway, or Canterbury Overpass. There are some posted prohibitions, but lack of on-street parking is due to lack of demand. On-street parking is rare on surrounding	D-22

streets south of State Road 160, including roads fronting Red Lion Hotel, Costco, REI, Exposition Blvd., Royal Oaks Overpass, Tribute Road and within Johnson Industrial Park. On street parking will transform this intersection.

D-22
cont'd

E. MEIR proposes four additional traffic signals for the 2030 build out of the Expo Parkway commercial corridor: 1) Eastbound SR 160 Exit/Leisure Lane; 2) Canterbury Overpass/Leisure Lane; 3) Westbound SR 160 Exit and Onramp/Canterbury Overpass; Westbound SR 160 Exit and Onramp/Royal Oaks Overpass. These proposed signals would bottle-up Woodlake neighborhood and create a traffic nightmare for residents wishing to travel southward or eastward across SR 160.

D-23

F. The recent increase in the speed limit on SR 160 from 55 to 65 mph has made exiting and entering SR 160 more difficult and more dangerous. Rapid breaking is required at all (4) exits from SR 160 at Royal Oaks Blvd. and Canterbury Rd. All exits require abrupt turns posted at 15 mph. All four onramps both eastbound and westbound onto SR 160 are short, require rapid acceleration to merge with traffic, and do not meet current Caltrans standards. The proposed signals at exit ramps would dangerously back traffic during peak hours onto SR 160. The increased number of vehicle trips resulting from this development proposal is not “less than significant.”

D-24

G. The increase speed limit on SR 160 has resulted in significantly higher road noise and sound pollution in Woodlake neighborhood. A sound wall should be constructed for noise abatement.

D-25

9. General Plan Policy ER 2.1.5 -- Riparian Habitat Integrity, “The City shall preserve the ecological integrity of creek corridors . . .” p 29
General Plan Policy ER 2.1.6 – Wetland Protection, “The City shall preserve and protect wetland resources . . .” p 29

These two statements represent a highly intelligent policy, especially in regards to current drought conditions in California and the potential for worsening drought conditions as the consequence of global warming. This policy should be applied to current existing creeks, drainages, and wetlands. When and where possible this policy should also be applied to ancient creek beds and wetlands in the urban area which have been destroyed through prior land development and bad land management practices by private owners.

D-26

Woodlake Creek offers the City a golden opportunity to put the collective wisdom of its ER policy into practice through the restoration of this ancient creek corridor and its wetlands. This opportunity is threatened by the proposed development of the Advanced Health Care, and by an earlier development proposal for the Expo-Parkway Psych Hospital on Lot 3 which was approved by the City Council, but is currently under litigation.

Woodlake Creek and the Woodlake Wetlands is an ancient and small tributary to the American River which has been decimated as a riparian habitat by past misguided public policy and bad land management practices. Woodlake Creek flows above ground for

only a short distance of .25 mi. through Woodlake Neighborhood before it is channeled within concrete to Sump 151. Woodlake Wetlands formerly extended across much of what is now known as the Expo Parkway Commercial Corridor. It was drained in the 1930's under WPA federal land reclamation policies when the Woodlake/Garden Highway levee was raised to protect North Sacramento and Natomas from annual American River flooding. Sump 151 was installed to drain the Woodlake wetlands by pumping water over the levee into Woodlake Slough, the trench created by excavation of fill dirt for the levee. The creek was thus diverted from its original southward flow into the American River. A concrete catchment channel 500 ft. long X 60 ft. wide X 16 ft. deep was also constructed at this time to contain the waters of the two forks of Woodlake Creek.

The North Fork of Woodlake Creek originates at an artesian spring under the American Ice Company ice factory on Del Paso Blvd. It supplies fresh potable water for the commercial ice making operation, the ice rink, and the Woodlake swimming pool. The overflow from this commercial usage exits behind the swimming pool creating Woodlake Creek which bisects Woodlake Neighborhood in a north/south direction from Lockbrae Ave to SR 160. The East Fork of Woodlake Creek surfaces from an artesian spring under the lake at the Red Lion Hotel on Leisure Lane. The flow water from the lake is piped underground directly into the concrete catchment channel of Sump 151.

The waters of both the ice plant well and the hotel well are clear, potable mineral enriched waters that have traveled a long way underground from their source in the upper elevations of the American River. These waters bubble to the surface pure and drinkable through naturally occurring artesian hydrology which is not uncommon due to the subsurface geology of the Central Valley. They are not mixed with local run off waters or ground water until they surface. By legal definition, the waters produced from natural springs are creeks and these creeks and their riparian habitat are protected under the federal Wild and Scenic Rivers Act.

The City Planning Dept. should put the Advanced Health Care development proposal at this location on hold. The Woodlake Creek watershed is a tremendous natural asset to the City. It delivers free of charge pristine alpine waters to North Sacramento and the American River delta. The creek ecosystem should be studied by scientists and policy-makers, and a long-term restoration plan for the creek should be undertaken. This land use at this site would be much more beneficial to the city than commercial land development and infill. Woodlake Creek and Woodlake Wetlands could become a model for urban riparian habitat restoration. It would create a public amenity, a greenbelt connecting the Del Paso Blvd. commercial district to the American River Parkway. Del Paso Blvd. has stubbornly resisted all previous attempts of urban renewal. The restoration of Woodlake Creek and Wetlands and the creation of a green corridor with pools, pathways, bike trails, public vegetable gardens, picnic areas, and wetlands is the public amenity key to turning the Del Paso Blvd. urban blight problem around.

Submitted by Thomas Powell
February 23, 2015

D-26
cont'd

Comment Letter A – Governor’s Office of Planning and Research

Response

The City of Sacramento (City or Lead Agency) submitted the draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Advanced Health Care of Sacramento (project) to the State Clearinghouse for circulation to public agencies on January 23, 2015. The 30-day public comment period closed on February 23, 2015. In addition, the City noticed the IS/MND locally through the County of Sacramento’s clerk office. The comment letter confirms the status of review.

Comment Letter B – Regional San

Response

The City acknowledges that Sacramento Regional County Sanitation District (SRCSD) sewer impact fees are applicable to the proposed project. The City of Sacramento will coordinate with SRCSD prior to issuance of a building permit for the proposed project to determine sewer impact fees.

Comment Letter C – Central Valley Regional Water Quality Control Board

Response

The proposed project would result in the disturbance of one or more acres of soil and is thus subject to the Construction Storm Water General Permit as regulated by the Regional Water Quality Control Board (RWQCB). The City is required to adhere to this permit and will have a Storm Water Pollution Prevention Plan prepared per the Construction General Permit. Likewise, the City must require industry standard construction Best Management Practices (BMP) prior to and during construction of the proposed project. Storm water discharges must comply with the regulations outlined in the Industrial Storm Water General Permit as regulated by the RWQCB. The proposed project is subject to neither Section 404 nor Section 401 of the Clean Water Act as there are not identified impacts to waters of the U.S. or waters of the State. No surface water drainage realignment is involved and the project is not subject to the Streambed Alteration Agreement as regulated by the California Department of Fish and Wildlife. The project site will not be used for commercially irrigated agriculture. Construction of the proposed project will not require dewatering.

Comment Letter D – Mr. Thomas Powell

Response D-1

The quotation identified in the comment is located on Page 58 of the Draft IS/MND; no additional response is necessary.

Response D-2

Potential impacts to public services (e.g., fire protection, police protection, and schools) are analyzed in Section 9 of the Draft IS/MND. The City determined that impacts to public services would be less than significant. The proposed project consists of a surgical and stroke recovery center and short-term skilled nursing facility. The General Plan land use designation is “Suburban Center” and the zoning is C-2-LI (General Commercial) which is compatible with the proposed land use. The proposed use meets the definition of a major medical facility per zoning definition. A major medical facility may be allowed in the C-2 zone with the approval of a conditional use permit. A major medical facility also requires a conditional use permit in the H zone. A rezone to Zone H is not required.

Response D-3

As stated in Section II – Project Description (Page 4 of the Draft IS/MND), the project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. It was accounted for in the City’s 2030 General Plan, and Master Environmental Impact Report (MEIR), and the project is consistent with the General Plan land use designation (Suburban Center); additionally, it would not require any change to the current zoning (C-2-LI, or General Commercial). The project is consistent with the 2035 General Plan and MEIR as well.

Per the City’s zoning map book, the subject site has been zoned as General Commercial Labor Intensive Overlay (C-2-LI) since early 2000. On November 18, 1999 the Planning Commission approved entitlements (P99-069) necessary to develop a seven story, 120-room hotel building totaling 84,300 square feet, including 8,100 square feet of exhibit space, on the adjacent site to this project with off-site parking on various parcels including the subject parcel. On January 16, 2002, the Zoning Administrator approved with conditions a Special Permit Time Extension and a Variance Time Extension to construct the aforementioned hotel (Z01-207). On June 20, 2007, the Design Commission approved the project to construct seven single-story buildings ranging in size from 9,510 square feet to 12,881 square feet on multiple parcels totaling 8.84 acres (DR04-187) including the subject site. The subject site is currently vacant with no development.

Response D-4

The Grant Deed and Title Insurance Policy, included as attachments to these responses, include information regarding the legal owner of the subject property. The current legal status of the project site is not relevant to CEQA analysis.

Response D-5

Along the southern portion of the project site there is an existing 15’ private sewer easement running east to west. This easement traverses across the entire width of the project site. The existing sewer line conveys untreated raw sewage through the project site from the adjacent property (APN 275-0260-068) to the east. This sewer line is for the collection of the building sewer only and neither conveys storm runoff nor is a drain line from the adjacent lake. There is also an existing 10’ electrical and communications easement for the Sacramento Municipal Utility District (SMUD) and Pacific Gas & Electric (PG&E) company that runs parallel with the

existing sewer easement mentioned above. Just south of the electrical easement and contiguous to Expo Parkway is a public storm drain easement. At the southeast corner of this property, there is a 10' wide private storm drain easement that comes into the property approximately 33' adjacent to the east property line. The existence of these easements do not affect the impact analysis or conclusions included in the Draft IS/MND.

Response D-6

The City correctly relies on the population projections outlined in the 2030 General Plan MEIR for determining impacts to this environmental topic area in the Draft IS/MND. The proposed project consists of a surgical and stroke recovery center and short-term skilled nursing facility and would not result in an increase in population, or an indirect requirement for new housing, due to project construction and operation. Development of the project site was previously envisioned and analyzed under the 2030 General Plan MEIR for the project's underlying land use designation and zoning; this analysis took into consideration the water demands required by the proposed project. The project is consistent with the 2035 General Plan and MEIR as well.

Response D-7

The Draft IS/MND incorrectly stated that State Route 160 is located approximately 0.7 miles from the project site. State Route 160 is located approximately 400 feet to the north from the northern border of the project site. This inadvertent error neither changes the impact analysis nor conclusions of the Draft IS/MND. The proposed project consists of a surgical and stroke recovery center and short-term skilled nursing facility and does not propose locating residences within 500 feet of a state route. As stated on Page 19 (Question G) of the Draft IS/MND, "CARB's Land Use Handbook recommends that a site specific health risk assessment be performed for projects that would locate residences or other sensitive land uses within 500 feet of a freeway, urban road with 100,000 vehicles per day (or more), or rural road with 50,000 vehicles per day (CARB 2005). The project site is not located near any major freeway but is located near State Route 160, which is classified as an urban road. According to the ... 2030 General Plan MEIR, the Average Daily Trips (ADT) for the segment of State Route 160 in front of the project site would be 45,900 ADT ... with buildout of the General Plan." District 3 State Route 160 Transportation concept Report (California Department of Transportation, 8/8/2014) reported that the segment of SR 160 within the project vicinity has a base year AADDT of 43,500 trips with a projected 20 years horizon to a maximum AADDT of 57,207 trip. As a commercial land use located adjacent to an urban road with less than 100,000 ADT, a Health Risk Assessment is not required or warranted for the proposed project.

Response D-8

A Jurisdictional Delineation and Special Status Species Assessment (Gibson & Skordal 2014) was prepared for the project site and appended to the Draft IS/MND. Based on the results of this report no water features were mapped within the study area. This conclusion is supported by substantial evidence. As the commenter fails to raise any issue regarding the conclusions made in the Draft IS/MND, further response is unwarranted.

Response D-9

The reader is referred to Response D-8 above.

Response D-10

As stated on Page 2 of the Jurisdictional Delineation and Special Status Species Assessment (Gibson & Skordal 2014), as appended to the Draft IS/MND, the [project] site consists of highly disturbed non-native annual grasslands. Plants consisted of soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), barley (*Hordeum murinum*), yellow star-thistle (*Centaurea solstitialis*), and wild oats (*Avena fatua*). The only woody species present were two valley oaks (*Quercus lobata*).” Surveys were conducted on June 5, 2014 (during the appropriate blooming season).

Response D-11

Please refer to the attached Grant Deed and Title Insurance Policy for information regarding the legal owner of the subject property. The project site is maintained for wildfire suppression and weed abatement purposes, as required by the City, as evidenced by regular mowing operations. As stated on Page 12 of the Jurisdictional Delineation and Special Status Species Assessment (Gibson & Skordal 2014), elderberry (*Sambucus* sp.) habitat is not present on the project site but may be present adjacent to the American River. The proposed project would not impact elderberry shrubs located off the project site.

Response D-12

The commenter implies that restoring the project site to pre-1930 conditions would be a better land use option than the proposed project. This comment does not question the content or accuracy of the Draft IS/MND and further response is unwarranted.

Response D-13

The statement on Page 33 of the Draft IS/MND (“the project site is a vacant lot and has not been previously developed”) is an accurate depiction of the baseline project site conditions.

Response D-14

The reader is referred to Responses D-4, D-5, and D-11 above.

Response D-15

The commenter appears to be concerned about the early historic route from Sacramento to Marysville. On the 1885 map (available on line on the Library of Congress website), the Marysville Road can be seen approximately 0.5 miles north of the project site. This road is the route of Del Paso Boulevard, with Marysville Boulevard splitting off Del Paso Boulevard, showing that this is the former road to Marysville, later renamed. This road course can be clearly seen on both the 1911 Brighton and Official County maps. There is no early roadway within the

current project area. The course of an early roadway appears to have become Del Paso Road/Marysville Boulevard.

Response D-16

The City's 2030 General Plan MEIR analyzed the potential impact on hydrology from development that could occur consistent with the general plan, and concluded that, with implementation of the identified policies individual projects would have no net increase on storm water runoff and impacts were less than significant. Construction of the proposed project would result in approximately 80 percent impervious surface on the project site. Currently the project site has a paved road and turn around area that creates approximately 7 percent impervious surface. The City's design standards require development to design the storm drain system for the 10 year event and overland release for the 100 year event. This drainage discharges into the City's drainage corridor approximately 200 feet to the west. From there, the water drains south to the City's Sump Pump No. 151 approximately 600 feet south. Due to the proximity to the drainage way, the project site's peak runoff will be required to enter the drainage way (pending an approved drainage study per the aforementioned General Plan policies) and reach the City's Sump Pump No. 151 prior to drainage from Woodlake reaching Sump Pump No. 151. The residential areas north of State Route 160 have multiple detention basins that hold the storm runoff in the Charlesgate Detention Basin, Woodlake Detention Basin, and Ice House Detention Basin. The project site is required to provide a permanent water quality BMP system which is consistent with National Pollution Discharge Elimination System (NPDES) permit requirements of the Regional Water Quality Control Board. The stormwater system, as designed and implemented, will meet all the City's standards for water quality and hydrologic control of runoff.

Response D-17

The City's Sump Pump No. 151 was designed to drain a large watershed of which the project site is part. Per FIRM panel 0177H, the project site is located within Zone X (Areas of 0.2 percent annual chance flood). Elevation of the project site and/or proposed project is not required per FEMA regulations nor any City requirement.

Response D-18

The commenter suggests that the calculation used for the proposed project's vehicle trips/peak hours is flawed. However, no additional information is provided and further response is unwarranted. Please refer to Response D-19, below, for additional information about potential traffic impacts associated with the proposed project.

Response D-19

The project trip generation estimate is based on information provided by the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition. ITE 620 for Nursing Home land use was used in the estimation of the peak hour trips using the size of the building as the variable for the calculations. The development project is expected to generate 17 trips during the morning peak hour (7am-9am), 23 trips during afternoon peak hour (4pm-6pm), and 240 daily trips. According to the information about staffing and changing in shifts, the overlap between the

shifts occurs during the off peak hours as discussed below. The trips generated by the project will not have a significant effect on surrounding roadways or intersections.

The proposed project will be staffed continuously over a 24-hour period. However, the number of staff will vary depending on the time of day. In general staff work either from 7am until 3pm (day shift), from 3pm until 11pm (afternoon shift), or from 11pm until 7am (evening shift). However, some of the day and afternoon staff will overlap for about an hour (most likely between 2pm-3pm). During this hour it is possible that there may be as many as 44 employees in the building. The reason for the overlap is to make sure that the nursing staff coming in to work on the afternoon shift know the condition of the patients at that time and are able to communicate with the nursing staff that worked with those patients in the morning. During the evening shift it is anticipated that there may be as few as five staff in the building. Certain staff members, such as the Executive Director and the Director of Nursing, will usually work a normal “business” day, between 8am and 5pm. In summary, between 8am and 5pm (except for the one-hour overlap between 2pm and 3pm) it is anticipated that there will be approximately 38 staff in the building. It is not anticipated that physicians will be spending a significant amount of time in this facility; the staff physician is available on an on-call basis. It is also not anticipated that there will be facility employees with the designation of “orderly”, “pharmacist”, or “van driver.” The Executive Director is the “administrator.”

Response D-20

Please see Response D-19. There may be as few as five employees leaving the facility at 7am and as many as 38 arriving between 6 and 8am (anticipated am peak period of the project). A peak hour on the adjacent street (one hour between 7am and 9 am) does not always coincide with the peak hour of a project (peak hour of trip generator). Most of those who arrive at 7am will be leaving at 3pm (pre-pm peak hour on the adjacent street) and their replacements will be arriving at that time or perhaps a little earlier for those who will be part of the 2pm to 3pm overlap. Only a few employees are anticipated to be leaving the facility between 5pm and 6pm (pm peak hour).

Response D-21

Most visitors at other Advanced Health Care facilities visit during weekend days and on the way to work or in the evening Monday through Friday. It is anticipated that the same visitation pattern will occur at proposed project. Sixty-four parking spaces will be sufficient for the number of guests that are anticipated, as required by City code for commercial operations of this size. During the most likely time guests will visit, staffing is unlikely to be greater than 38.

Response D-22

The proposed project includes dedicated surface parking for 64 vehicles (two parking spaces are Americans with Disabilities Act compliant). Per City code, the applicant is required to provide 61 dedicated surface parking spaces for both project employees and guests. No substantial change to the on-street parking is anticipated with the project.

Response D-23

The City's 2030 General Plan MEIR analyzes the potential impact of the development of the general plan land uses on major roadways and did not analyze intersections within proximity to the project site. The proposed project is consistent with the land uses designated for the project site as reflected in the City of Sacramento General Plan.

The proposed signals mentioned in the comment letter are not proposed with this project. These signals were defined in a traffic impact study prepared in November 2000 by DKS Associates (Traffic Study of Potential Development in the SR 160 Corridor- North Sacramento). The project is required to pay a fair share contribution (to be determined by the City) based on trip generation for a future traffic signal installation at the intersection of Canterbury Road/Expo Parkway and Leisure Lane/ Slobe Avenue. The installation of the traffic signals at the several intersections mentioned in the comment letter shall be subject to further studies which may include roadway and ramp improvements which are not part of the proposed project.

Response D-24

The reader is referred to Responses D-19 and D-23, above.

Response D-25

An Environmental Noise Assessment (J.C. Brennan Associates 2014) was prepared and appended to the Draft IS/MND analyzing the proposed project's potential impacts related to noise. Accordingly, a noise abatement wall has been prescribed as Mitigation Measure NOI-01 (see Page 56 of the Draft IS/MND). As outlined in the Draft IS/MND, implementation of Mitigation Measures NOI-01 and NOI-02 will reduce impacts related to noise to a less than significant level. The Environmental Noise Assessment did not find that noise levels emanating from SR 160 would create significant noise levels impacting the proposed use.

Response D-26

The commenter identifies policies from the City's 2030 General Plan as they related to riparian habitat and wetland protection. As previously stated in several responses (above), the project site does not support riparian or wetland habitat types. Potential project impacts related to hydrology and water quality have been analyzed and presented in Section 7 (Page 44) of the Draft IS/MND. The analysis shows that project construction and/or operation would have no impact on groundwater resources. The project site is required to provide a permanent water quality BMP system which is consistent with NPDES permit requirements promulgated by the Regional Water Quality Control Board. This system is being designed consistent with the City of Sacramento, Department of Utilities; design requirements and final plans will be approved by the Department of Utilities ensuring compliance with City standards for water quality.