



**ADDENDUM TO A CERTIFIED ENVIRONMENTAL IMPACT REPORT**

The City of Sacramento, California, a municipal corporation, does hereby prepare, make declare, and publish the Addendum to a certified Environmental Impact Report (EIR) for the following described project:

Project Name and Number: **Natomas II Apartments Project (P19-075)**

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

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

A copy of this document and all supportive documentation may be reviewed or obtained at the City of Sacramento, Community Development Department, Planning Division, 300 Richards Boulevard, Third Floor, Sacramento, California 95811 and on the City's web site for environmental documents at <http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports.aspx>.

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

By: \_\_\_\_\_

Date: May 19, 2020

**Natomas II Apartments Project (P19-075)**  
**Addendum to a Certified Environmental Impact Report**  
**SCH No. 2007112008**

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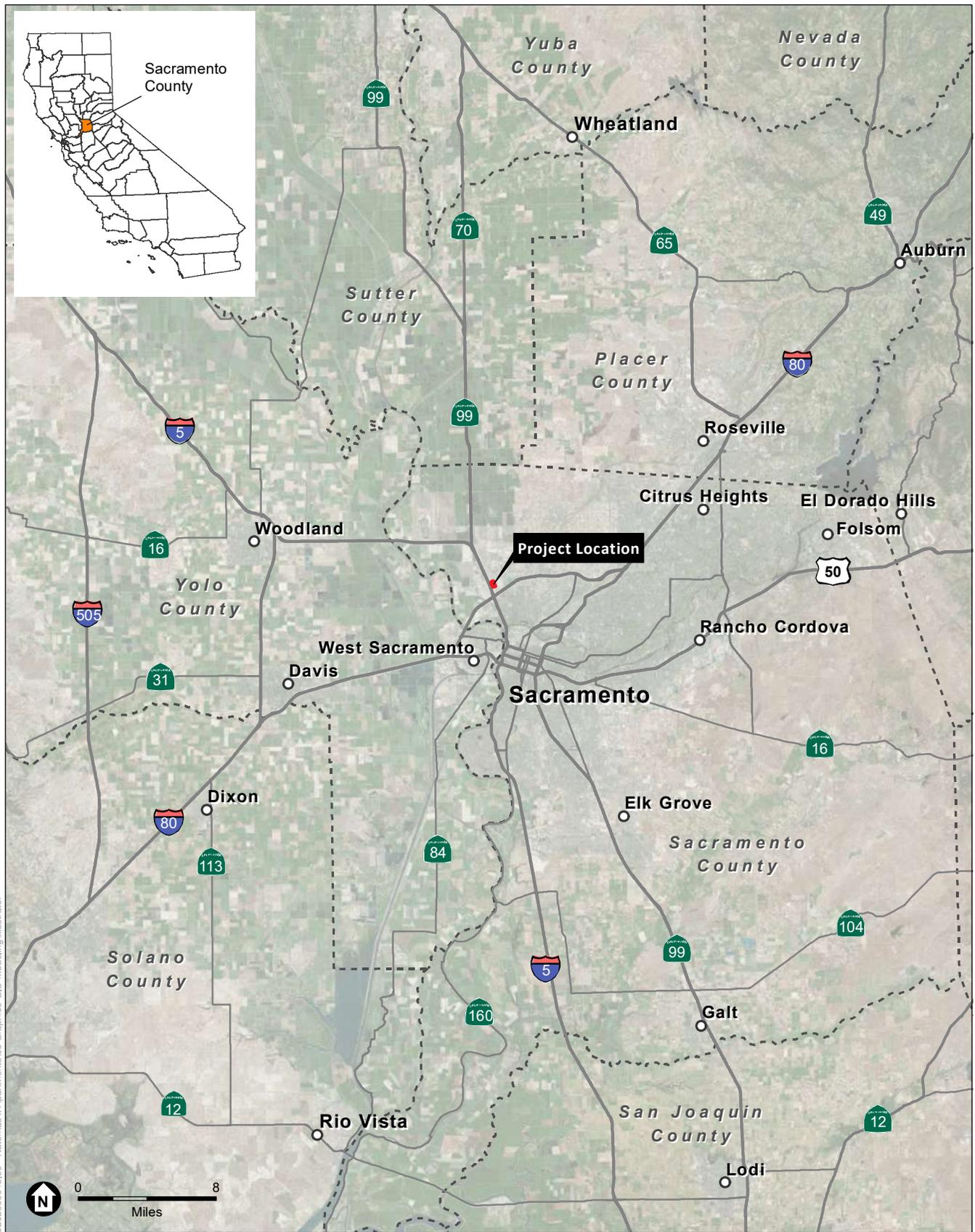
**File Number/Project Name:** Natomas II Apartments Project (P19-075)

**Project Location:** The project site is located in Sacramento, California, approximately 80 miles east of San Francisco and 85 miles west of Lake Tahoe. Sacramento is a major transportation hub, the point of intersection of transportation routes that connect Sacramento to the San Francisco Bay area to the west, the Sierra Nevada mountains and Nevada to the east, Los Angeles to the south, and Oregon and the Pacific Northwest to the north. The City is bisected by major freeways including Interstate 5 (I-5) that traverses the state from north to south; Interstate 80 (I-80), which provides an east-west connection between San Francisco and Reno; and U.S. Highway 50 which provides an east-west connection between Sacramento and South Lake Tahoe. Two railroads, the Union Pacific (UP) Railroad and the BNSF Railway transect Sacramento. **Figure 1** shows the location of the project site in the Sacramento region.

The project site comprises approximately 16.46 acres of undeveloped land in the North Natomas area of Sacramento, north of downtown. The project site is bounded by I-5 and a 100-foot-wide City of Sacramento (City) easement to the west; land that is proposed for development to the north; East Commerce Way to the east; and land that is proposed for development to the south. **Figure 2** shows the location of the project site within the North Natomas area of Sacramento and **Figure 3** shows the project vicinity and site.

**Existing Plan Designations and Zoning:** The project site is located on two parcels within Quadrant C (Quad C) of the Natomas Crossing PUD area: APN 225-2300-012 and a portion of APN 225-2300-013. The project site is presently designated as Regional Commercial by the 2035 General Plan (see **Figure 4**). The Regional Commercial land use designation provides for predominantly nonresidential, largescale, regional shopping centers with a mix of uses including multi-family residential.

The project site is also presently zoned EC-50-PUD (Employment Center – Planning Unit Development) and SC-PUD (Shopping Center-Planned Unit Development) (see **Figure 5**). *Employment Center* zones are intended to provide a flexible zone for employment-generating uses in a pedestrian-friendly setting with ample open space while *Shopping Center* zones are intended to provide a wide range of goods and services to the community, and allows office and residential uses.

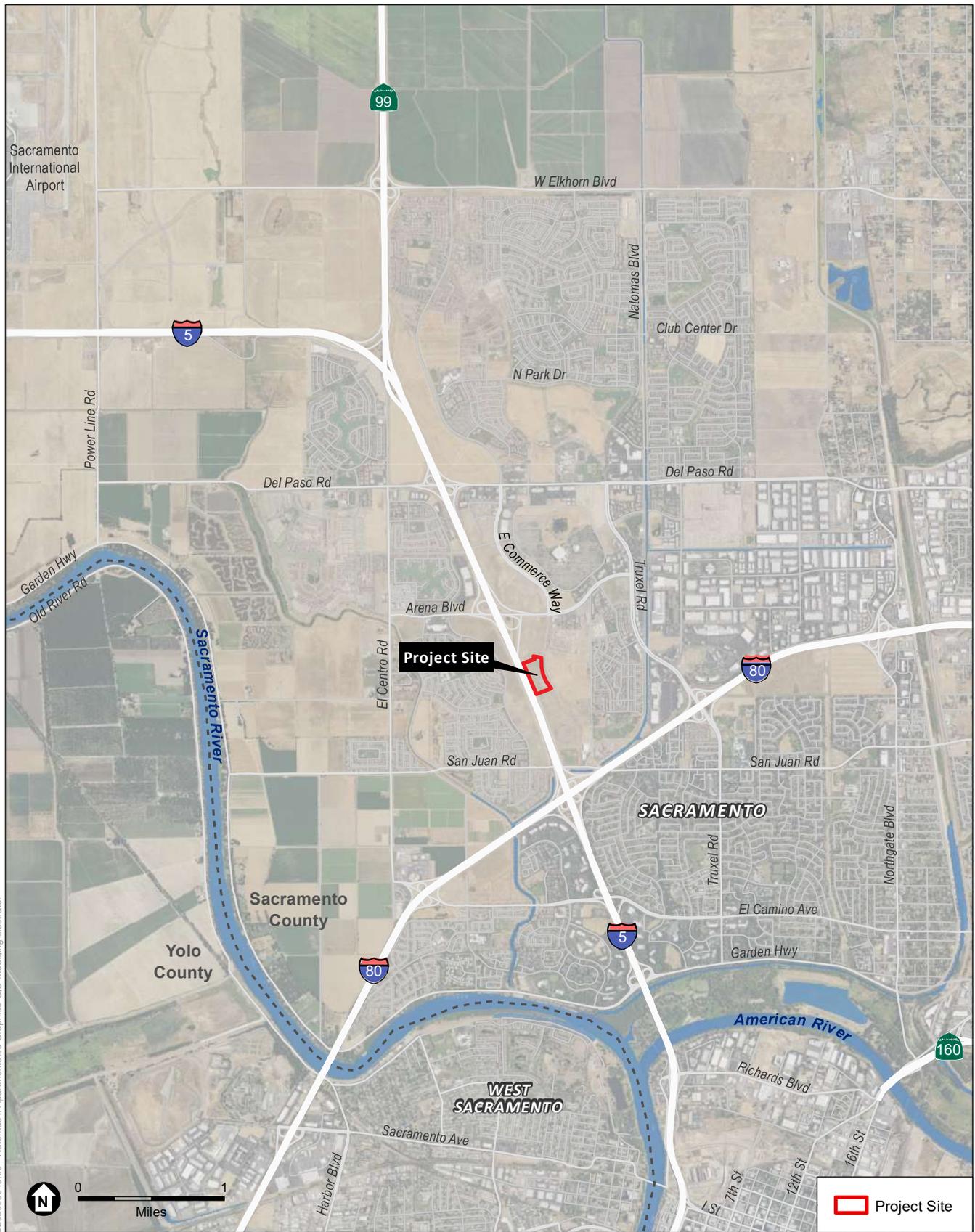


SOURCE: Esri, 2015; ESA, 2020

Natomas II Apartments

**Figure 1**  
Project Location in Sacramento Region





SOURCE: Esri, 2012; USDA, 2016; ESA, 2020

Natomas II Apartments

**Figure 2**  
Project Location in North Natomas





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SOURCE: Google, 2020; ESA, 2020

Natomas II Apartments

**Figure 3**  
Project Site





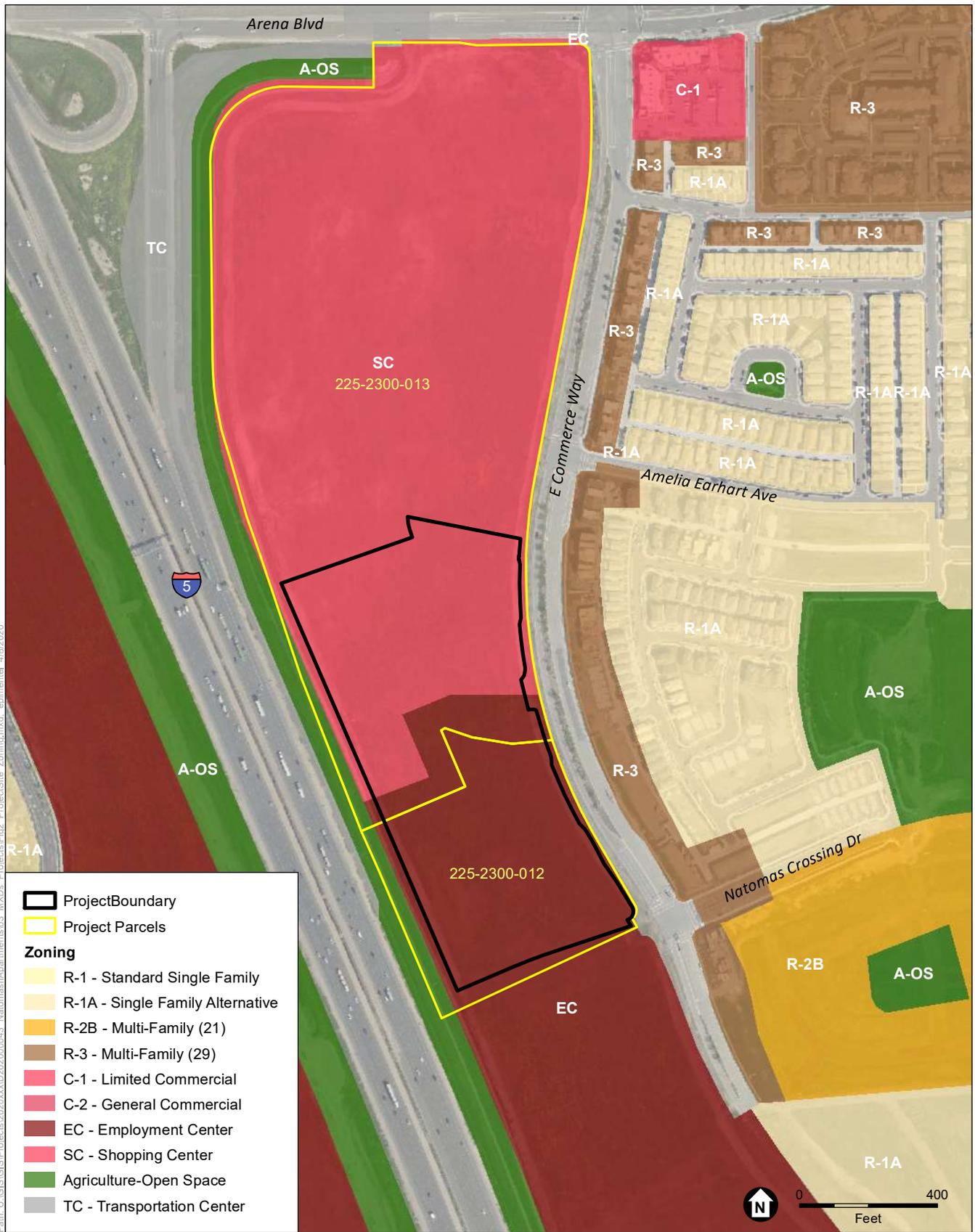
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SOURCE: Sacramento County, 2018; City of Sacramento, 2020; ESA, 2020

Natomas II Apartments Project

**Figure 4**  
Existing General Plan Land Use Designation





SOURCE: Sacramento County, 2018; City of Sacramento, 2020; ESA, 2020

Natomas II Apartments Project

**Figure 5**  
Existing Zoning Designations



## Project Background

The project site has been the subject of multiple reviews pursuant to the California Environmental Quality Act (CEQA). Potential development for the project site has been planned or evaluated in the following documents, for which key information is included in the background discussion below:

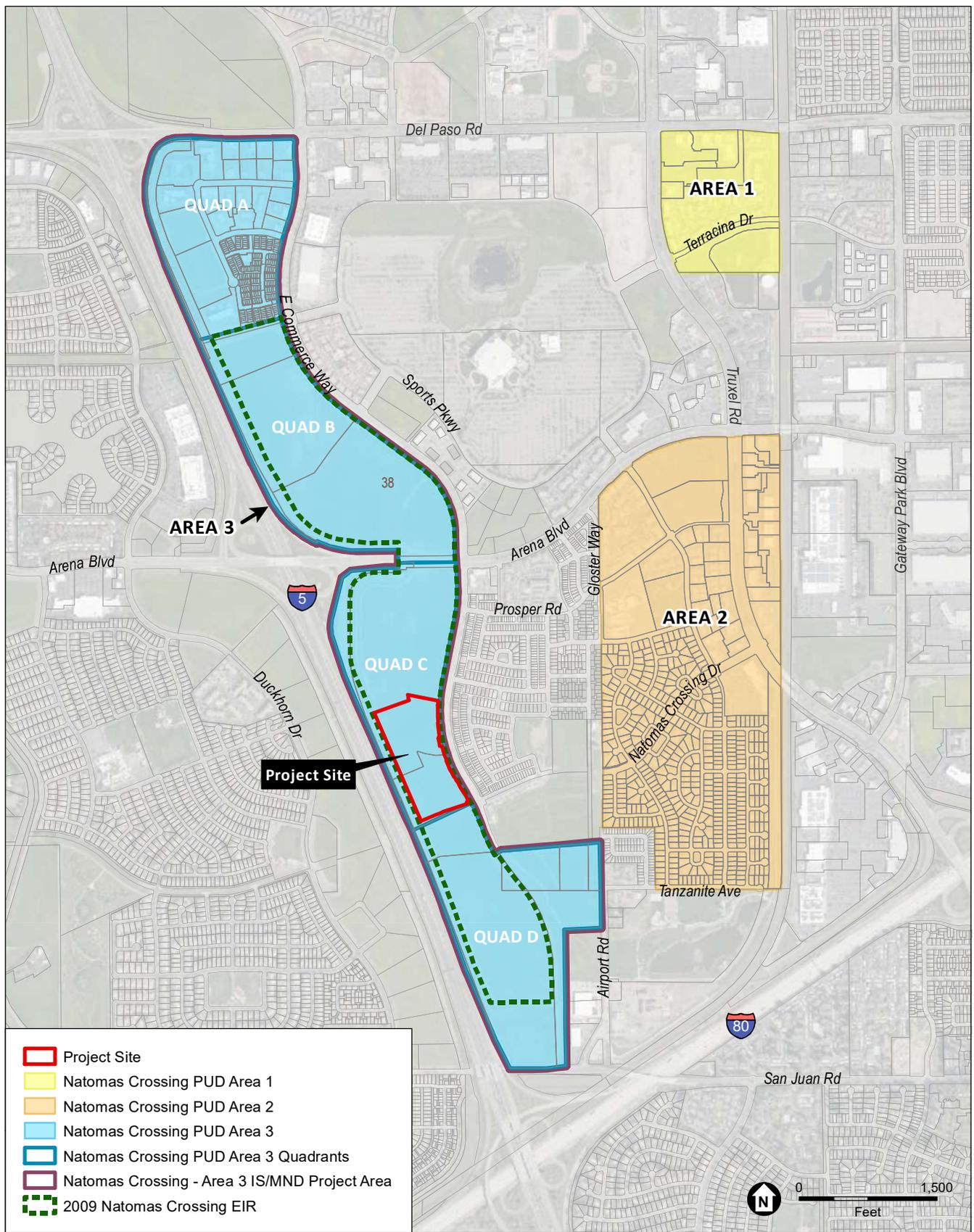
- North Natomas Community Plan (May 3, 1994);
- Alleghany Properties, Inc. Development Area 3 Negative Declaration (June 24, 1997);
- Natomas Crossing Area 3 Initial Study/Mitigated Negative Declaration (June 25, 2002);
- Sacramento 2030 General Plan and Master EIR (March 3, 2009);
- Natomas Crossing Environmental Impact Report (August 11, 2009); and
- Sacramento 2035 General Plan and Sacramento 2035 General Plan Master EIR (March 3, 2015).

### North Natomas Community Plan

The North Natomas Community Plan (NNCP, Resolution No. 94-259 for M92-078) covers an area bounded by Elkhorn Boulevard to the north, I-80 to the southwest, the Natomas East main Drainage Canal to the east and the West Drainage Canal, and Fisherman's Lake and Highway 99 to the west. The NNCP included 14 neighborhoods, with a total estimated population of 66,495 residents at buildout.

### Alleghany Properties, Inc. Development Area #3 Project (P96-084)

The project site is part of the larger Natomas Crossing Planned Unit Development (PUD), for which entitlements were approved by the City of Sacramento in 1997 (see **Figure 6**). The entire 555-acre Natomas Crossing PUD is within the 1994 North Natomas Community Plan area. On May 8, 1997 the Planning Commission initially approved a Tentative Master Parcel Map for the Natomas Crossing PUD development (City Project No. P96-084). Soon after, on June 24, 1997, the City Council approved a development agreement, rezone, schematic plan and development guidelines for the area (P96-084). The Natomas Crossing PUD is subdivided into three separately defined development areas described as Area 1 through Area 3, as shown in Figure 6. The project site is within Area 3 of the PUD, which is further segregated into four quadrants described as Quad A through Quad D. Under the Natomas Crossing PUD, Quad C was designated Convenience Commercial (CC), Employment Center 40 (EC-40), and Employment Center 50 (EC-50).



SOURCE: Esri, 2012; USDA, 2016; ESA, 2020

Klotz Ranch Apartments

**Figure 6**  
Natomas Crossing Planned Unit Development Map



## **Natomas Crossing – Area 3 IS/MND**

In April 2002, the City of Sacramento completed the Natomas Crossing – Area 3 Initial Study/Mitigated Negative Declaration (IS/MND) that evaluated revised land use designations and rezoning for Area 3 of the Natomas Crossing PUD, including Quads A, B, C and D. The entitlements sought for the Area 3 component of the PUD included Community Plan Amendments, rezone, lot line adjustments, a tentative subdivision map, PUD Guidelines, and Schematic Plan Amendments to accommodate Employment Commercial (EC) uses at a greater intensity, and to re-locate a proposed hotel site within the plan area. In addition, two special permits were provided for an office building proposed in Quadrant B.

The land uses planned for the Area 3 component of the PUD included offices, hotels, restaurants, retail uses, open space, a detention basin, and residential units. The buildout total of approximately 1,526,390 to 3,968,715 square feet (sf) of development was approved in June 2002, with approximately 1,016,900 to 2,977,919 sf proposed as office; 67,090 to 280,956 sf of retail; 290,400 to 457,600 sf of hotels; and the balance of square footage related to potential daycare and residential uses.

## **2030 General Plan and 2030 General Plan Master EIR**

In March 2009, the City adopted the 2030 General Plan and certified the Master EIR for the 2030 General Plan (State Clearinghouse #2007072024), which updated the general plan land use designation for Quads B, C and D. The 2030 General Plan was a comprehensive update to the 1988 General Plan. The land use designation for Quad C was updated to Planned Development, which is generally applied to areas with pending projects that are in the development review process. The Planned Development designation does not have urban design guidelines or development standards.

## **Natomas Crossing Project EIR**

On August 11, 2009, the City certified the Natomas Crossing Project EIR (City project number P04-264; City Council Resolution No. 2009-531), which evaluated a proposed amendment to the PUD Schematic Plan and rezone of Quad C from C-1 (3.8 acres), EC-40 (14.2 acres), and EC-50 (34.9 acres) to SC (42.6 acres) and EC-50 (10.3 acres) to allow for the anticipated development of 404,580 sf of regional retail uses and 200,000 sf of office uses. The general plan land use designation for Quad C was also changed from Planned Development to Regional Commercial.

The Natomas Crossing EIR evaluated development of Quad C at a programmatic level, commensurate with the level of certainty regarding future development of the site.

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

In 2015, the City adopted the Sacramento 2035 General Plan and certified the Sacramento 2035 General Plan Master EIR (State Clearinghouse #2012122006), which maintained the Regional Commercial land use designation for Quad C.

## Project Description

The proposed project is a two-phase, market rate multi-family residential development project totaling 472 units. Phase I would be constructed on the southern portion of the site (9.46 acres) and include 270 units while Phase II would be constructed on the northern portion of the site (7 acres) and include 202 units. A total of seven 4-story buildings would be constructed – four buildings in Phase I and three buildings in Phase II. The project components are shown on the site plan in **Figure 7** and are described in further detail below.

## Apartments Units

The proposed project includes 472 market rate rental apartment units and would have an overall density of approximately 29 dwelling units per acre. The apartment units would range in size from 480 to 1,224 square feet with a mix of 33 studio units, 258 one-bedroom units, and 181 two-bedroom units (see **Table 1**). Phase I would include a mix of 20 studio units, 149 one-bedroom units, and 101 two-bedroom units for a total of 270 units while Phase II would include a mix of 13 studio units, 109 one-bedroom units, and 80 two-bedroom units for a total of 202 units.

**TABLE 1  
RESIDENTIAL UNIT MIX SUMMARY**

| Unit Type    | Number of Units |            |            | Unit Size (sf) |
|--------------|-----------------|------------|------------|----------------|
|              | Phase I         | Phase II   | Total      |                |
| Studio       | 20              | 13         | 33         | 480            |
| One-Bedroom  | 149             | 109        | 258        | 580-771        |
| Two-Bedroom  | 101             | 80         | 181        | 937-1,224      |
| <b>Total</b> | <b>270</b>      | <b>202</b> | <b>472</b> | --             |

The apartment units would be located in seven buildings – four buildings with 57 units each (Building Type A), one building with 83 units (Building Type B), one building with 73 units (Building C), and one building with 88 units (Building C) (see **Table 2**). Phase I would include two Building Type A structures, one Building Type B structure, and one Building Type C Structure while Phase II would include two Building Type A structures and one Building Type D structure. Each structure would be 42 feet tall with architectural details (i.e., parapets) reaching a height of 48 feet.



**TABLE 2  
UNIT MIX SUMMARY BY BUILDING TYPE**

| Unit Type    | Number of Units |            |            |            |
|--------------|-----------------|------------|------------|------------|
|              | Building A      | Building B | Building C | Building D |
| Studio       | 3               | 7          | 7          | 7          |
| One-Bedroom  | 27              | 51         | 44         | 55         |
| Two-Bedroom  | 27              | 25         | 22         | 26         |
| <b>Total</b> | <b>57</b>       | <b>83</b>  | <b>73</b>  | <b>88</b>  |

## Recreational Amenities

Each phase will include a 12,000-square-foot clubhouse with indoor and outdoor amenities, including a game room, theatre, pool area with sun deck, dog park, yoga studio, bocce ball courts, and outdoor barbecue and dining areas.

## Parking

Parking for the project would be provided in covered carports, private garages, driveways, and surface lots adjacent to the apartment buildings. The proposed project would be subject to the parking requirements as described in the City of Sacramento Planning and Development Code. The project site is located within the Suburban Parking District and requires a minimum of 1.5 vehicle parking space per dwelling unit. According to the City Code, the proposed project is required to provide at least 708 parking spaces. A total of 857 spaces would be provided, including 593 parking spaces for residents and 263 parking spaces for visitors, thus exceeding the City's minimum requirement by 149 spaces (see **Table 3**). A total of 499 parking spaces would be provided under Phase I while a total of 358 parking spaces would be provided under Phase II.

**TABLE 3  
PARKING SUMMARY**

|                | Phase I    | Phase II   | Total      |
|----------------|------------|------------|------------|
| Resident       | 338        | 255        | 593        |
| Guest          | 161        | 102        | 263        |
| <b>Total</b>   | <b>499</b> | <b>358</b> | <b>857</b> |
| Required       | 405        | 303        | 708        |
| <i>Surplus</i> | 94         | 55         | 149        |

In addition, a total of 282 bicycle parking spaces would also be provided consisting of 22 exterior spaces and 206 interior spaces. Bicycle racks and interior storage would be provided for each building. A total of 162 bicycle spaces would be provided under Phase I while a total of 120 bicycle spaces would be provided under Phase II.

## Landscaping

Onsite landscaping would consist of turf areas interspersed with trees and shrubs along the perimeter of the project site and between buildings (see **Figure 8**). Overall, the proposed project would include approximately 67,300 sf of landscaping, which encompasses about nine percent of the project site, and is in excess of the City's open space requirements. Landscaping would be designed to meet California Assembly Bill (AB) 1881, Executive Order B-29-15, and the City's Model Water Efficient Landscape Ordinance.

## Exterior Lighting

Onsite security lighting would be provided in the parking lots and on the exterior of proposed buildings. Proposed outdoor lighting fixtures would include downward-shielding for overhead lighting fixtures and low-intensity exterior lighting to minimize fugitive light. Lighting mounted to the proposed buildings would be for safety and security purposes and would also be angled downward to provide targeted illumination and prevent fugitive light from illuminating adjacent areas.

## Traffic Circulation

### Vehicle Access

Phase I would be accessed by a primary driveway and a secondary access road that would intersect with East Commerce Way. Phase II would be accessed by a primary driveway that would intersect with East Commerce Way and a private road that would be constructed to run parallel to East Commerce Way and lead into the commercial parcels to the north of the project site (see Figure 7).

### Transit Access

Bus transit service in the area is provided by Sacramento Regional Transit (SacRT). The nearest SacRT bus stop is located approximately one mile to the northeast at the intersection of Arena Boulevard/Truxel Road.

### Bicycle Access

Bicycle access would be provided by a Class II bike lane along East Commerce Way that would be constructed as part of the project. The proposed project would also include connections to a planned Class I bike path along the western and southern perimeters of the project site.

### Pedestrian Access

Access to the project site for pedestrians would be provided via separated sidewalks, constructed as required by City design guidelines along East Commerce Way. Pedestrian paths would also be provided on the project site that lead to building entrances.



## Utilities

The project site is located within an area where water conveyance infrastructure is planned but has yet to be extended. Thus, offsite improvements would be necessary to provide water supply to the project site, as described below. The project site is located within an area where wastewater and storm water conveyance infrastructure has been installed in anticipation of future development. As a result, minimal offsite improvements would be necessary to provide wastewater and storm water service to the project site, as described below.

### Water Supply

The project site would be served by the City of Sacramento for domestic and fire suppression water needs. Water service to the proposed project would be provided by a future 12-inch main in East Commerce Way; a 4-inch lateral (domestic) and 12-inch lateral (fire) would connect to this main. All water supply infrastructure serving the project site would be required to meet City standards.

### Wastewater

Wastewater service for the project site would be collected by the Sacramento Area Sewer District's (SASD) Separated Sewer System, conveyed to the Sacramento Regional County Sanitation District (Regional San) system, and ultimately treated in the Regional San Wastewater Treatment Plan (WWTP), which is located in Elk Grove. Wastewater service to the proposed project would be provided by an existing 8-inch main in East Commerce Way; an 8-inch lateral would connect to this main. All wastewater conveyance infrastructure serving the project site would be required to meet SASD standards.

### Drainage

The project site is within Basin 6 of the North Natomas Drainage Basin system, which collects and treats stormwater, from nine basins, in the developed areas of North Natomas. Basin 6 generally encompasses Area 3 of the Natomas Crossing PUD and additional area south of Arena Boulevard and west of the East Drainage Canal. Stormwater on Quad C currently drains to the drainage canal that abuts the western perimeter of the project site, which flows south to Detention Basin 6B, and then to Detention Basin 6A, where stormwater is treated and then pumped into the existing RD-1000 drainage channel.

Stormwater on the project site would be managed with a combination of Low Impact Development (LID), stormwater quality treatment measures, and certified full capture trash control devices. These measures include, but are not limited to, the planting of new trees, the provision of a disconnected roof system, vegetated swales, and placement of amended soils. All storm water drainage infrastructure serving the project site would be required to meet SASD standards. A majority of the stormwater generated on the project site would flow directly to the existing drainage canal that abuts the western perimeter of the project site via an existing 36-inch drainage outfall. Stormwater generated on the

remainder of the project site would flow into an existing 42-inch main located within East Commerce Way and an existing 48-inch main that runs along the southern portion of the project site; the 42-inch main flows into the 48-inch main which in turn flows into the existing drainage canal to the west.

## **Energy**

### ***Electrical Service***

The project site would be provided electrical service by the Sacramento Municipal Utility District (SMUD). The main electrical system connection to the project site would be located within East Commerce Way, similar to other utilities.

### ***Natural Gas***

The project site would be provided with natural gas service by Pacific Gas & Electric (PG&E), which provides service to the City of Sacramento through both high and low-pressure systems. The main gas service connection to the project site would be located in East Commerce Way, similar to other utilities.

## **Telecommunications**

The proposed project would acquire telephone and data service from the current existing carrier(s) that are established in North Natomas. Connection(s) would be completed in existing telephonic and data manholes. The project applicant would coordinate with the City and other utility providers to determine the optimal solution for gaining access to adjacent lines, potentially including either open cuts or directional drilling that could be done in these manholes concurrent with other utility infrastructure connections. If feasible, service to the project site would be coordinated with SMUD in a common joint trench, in which a few 2-inch conduits would be added to the joint trench for telecommunication service.

## **Construction Activities and Schedule**

As described above, the proposed project would be constructed in two phases: Phase I and Phase II. Construction of each phase would occur over a period of 24 months. Construction of Phase I is anticipated to begin in fall 2020, with site grading and utility infrastructure work completed by early spring 2021. Construction of the structures associated with Phase I is expected to commence in fall 2020 with completion by fall 2022. The timing of Phase II construction is not known at this time; however, for purposes of this analysis it was assumed that Phase II would begin immediately after the completion of Phase I.

Site clearing would be followed by excavation and grading. Site construction would include finish grading to establish necessary pads and foundations, construction of retaining walls and site encroachment, and installation of underground utility lines (i.e., water, recycled water, sewer, storm-drainage, and fire hydrants). Subsequent phases would include building construction, completion of exterior and interior

improvements, and installation of landscaping. The proposed project has been designed to balance earthwork on the site between cut and fill. However, during excavation of the building footings, plumbing, etc., some incidental excavated material may need to be hauled off site.

The applicant would adhere to standard code requirements to minimize construction impacts from noise, vibration, light, dust, sedimentation and erosion, and general disturbances to sensitive receptors and sensitive resources, in addition to City Code requirements. Construction activities would be scheduled during normally acceptable hours in accordance with the City's noise ordinance.

The exact type and numbers of construction equipment would be based on what equipment is reasonably necessary to complete the project using industry standard means and methods. Typical vehicles that are expected to be used include but are not limited to: scrapers, backhoes, skip loaders, water trucks, generators, and other miscellaneous equipment.

## Entitlements

The project would potentially require the following planning approvals from the City of Sacramento:

- Amendment to the Natomas Crossing Planned Unit Development Guidelines and Schematic Plan;
- Conditional Use Permit for multi-family residential use in a Shopping Center zone; and
- Site Plan and Design Review with deviation increase building height.

## Discussion

In the case of a project proposal requiring discretionary approval by the City concerning changes to a project for which the City has previously certified an EIR for the overall project, as here, the City must determine whether, in light of the proposed changes to the project, the environmental analysis in the original EIR remains relevant because it retains some informational value. If so, the City then determines whether a subsequent EIR or MND is required. Pursuant to CEQA Guidelines §15162-15163, if the City determines, based on substantial evidence, that new information of substantial importance, or changes to the project or surrounding circumstances will require major revisions to the previous EIR due either to a new significant effect or a substantial increase in the severity of a previously identified significant effect on the environment, the City is required to prepare a Subsequent EIR or an EIR Supplement to analyze the project at hand. Pursuant to CEQA Guidelines §15164, if the agency finds no basis for requiring the preparation of either a Subsequent EIR or an EIR Supplement, but some changes or additions are necessary, an Addendum shall be prepared.

The proposed project seeks entitlements to develop an apartment complex on a site where substantial development, with similar impacts, was evaluated in an EIR. The changes to the prior project will occur within the same original parcel configuration and will retain some of the original features, rendering the previously certified EIR highly relevant to the environmental analysis of the changes to the project now proposed.

As described in CEQA Guidelines Section 15164, a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions identified in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred. The following identifies the standards set forth in CEQA Guidelines Section 15162, for which the preparation of a subsequent EIR would be required:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project but the project proponents decline to adopt the mitigation measure or alternative; or
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The Natomas Crossing EIR provides CEQA coverage for existing entitlements on the project site. Because the Natomas II Apartments project does not include substantial

changes to assumed development of Quad C under the Natomas Crossing project and no other circumstances have changed that would meet the criteria set forth in CEQA Guidelines Section 15162, requiring the preparation of a subsequent EIR, the City has determined that a subsequent EIR is not required for the proposed project. This document has been prepared as an addendum to the Natomas Crossing EIR. Differences in the potential impacts associated with the proposed project relative to those previously described in the Natomas Crossing EIR, are discussed below.

## I. Land Use and Planning

### **Consistency with the Adopted Plans and Policies**

The Natomas Crossing EIR included a discussion of the consistency of the Natomas Crossing project with adopted plans and policies that were in effect at the time the EIR was certified in 2009. A discussion of the proposed Natomas II apartments project's consistency with each of these plans and policies is provided below.

#### ***SACOG Blueprint***

The Sacramento Area Council of Governments (SACOG) adopted the Sacramento Region Blueprint Transportation and Land Use Study Preferred Blueprint Scenario (Blueprint) in December 2004. The discussion in the Natomas Crossing EIR explained how the Natomas Crossing project would have been consistent with the Blueprint's vision for the Natomas Crossing project site, which contemplated the site being developed as a medium density, mixed use center or corridor.

While the proposed project does not include a mix of uses, it would place medium density residential uses adjacent to a mix of restaurant, retail and office uses proposed on the remainder of Quad C to the north, thus contributing to a mixed use center located on Quad C. For this reason, the proposed project is consistent with this plan.

#### ***2030 General Plan***

The Natomas Crossing EIR included a discussion of the consistency of the Natomas Crossing project with the City's 2030 General Plan. The discussion explained how the re-designation of Quads B and C from PD to RC would have been consistent with 2030 General Plan LU Goal 5.4, which applies to regional centers, and supporting 2030 General Plan Policies LU 5.4.1 and LU 5.4.3.

General Plan LU Goal 5.4 expresses the City's desire to establish "major mixed-use activity centers... that are vibrant, regionally accessible destinations where people live, work, shop, and congregate in a mix of retail, employment, entertainment, and residential uses." The Natomas Crossing EIR determined that proposed development on Quads B and C would have achieved this goal by providing a mix of retail, commercial, restaurant and employment uses, including a large format retail pad for a home improvement center. While the proposed project does not include a mix of retail, employment, and entertainment uses, it would place residents within close proximity to planned retail, employment, and entertainment uses to the north on the remainder of Quad C, thus

creating a vibrant destination where people could live, work, and shop. Therefore, the proposed project would meet the intent of this goal when future retail uses planned for the area are considered.

General Plan Policy LU 5.4.1 states that the “City shall promote the introduction of housing and employment uses in the city’s existing regional centers as a means of enhancing retail viability, establishing pedestrian-oriented shopping districts, creating more attractive buildings and public spaces, supporting transit viability, and reducing vehicle trips.” The Natomas Crossing EIR determined that proposed development on Quads B and C would have been consistent with this policy as the proposed retail component would have been designed to evoke a “Main Street” feel coupled with a modern influence and the project’s design guidelines included a public plaza space to encourage outdoor dining. In addition, development on these quads would have provided convenient bicycle access, been located in proximity to transit, provided easy access to surrounding freeways, and provided a pleasant walking experience for pedestrians. While the proposed project does not include a retail component or a public plaza, it would not hinder the placement of these components on the remainder of Quad C to the north. In addition, the proposed project would provide convenient bicycle access by constructing a Class II bicycle lane along East Commerce Way and providing connections to a planned Class I bike path located planned along the western perimeter of the project site. Finally, the proposed project would be located in proximity to transit, provide easy access to surrounding freeways, and provide a pleasant walking experience for pedestrians by linking all buildings and future sidewalks along East Commerce Way with pedestrian paths. For these reasons, the proposed project is consistent with this policy.

Finally, General Plan Policy LU 5.4.3 states that the “City shall encourage greater pedestrian and bicycle connections between mixed-use regional commercial centers and surrounding neighborhoods.” The Natomas Crossing EIR determined that proposed development on Quads B and C would have been consistent with this policy as development on Quads B and C would have provided pedestrian and bicycle connections between surrounding uses. This would have been accomplished, in part, by constructing the planned Class I bike path in the freeway buffer to the west of the Natomas Crossing project site that is part of the regional bikeway system, offering a bike plaza with lockers to encourage alternative transportation, and linking all buildings and existing sidewalks with pedestrian paths. Again, as discussed above, the proposed project would provide connections to the planned Class I bike path along the western perimeter of the project site and link all buildings and future sidewalks with pedestrian paths. In addition, the proposed project would provide interior bicycle parking. For these reasons, the proposed project is consistent with this policy.

### ***2030 North Natomas Community Plan***

The Natomas Crossing EIR included a discussion of the consistency of the Natomas Crossing project with the 2030 North Natomas Community Plan (NNCP). General Plan Policy 1.1.5 requires that “community plans ... be consistent with the General Plan Land Use and Urban Form Diagram.” Further, the policy states that the City “...shall amend the

[citywide Land Use and Urban Form Diagram] as appropriate using the designations in the citywide Land Use and Urban Design Element to reflect community issues related to infill, redevelopment, reuse, and new growth.” Consistent with this policy, the 2030 NNCP designation for the Natomas Crossing project site was PD as the time the EIR was prepared. The discussion in the Natomas Crossing EIR explained that with the re-designation of the Natomas Crossing project site from PD to RC and EC-MR, the Natomas Crossing project would have been consistent with 2030 North Natomas Community Plan.

The proposed project is consistent with the project site’s RC general plan land use designation, and thus is not requesting a land use re-designation. As a result, the proposed project would remain consistent with the 2030 North Natomas Community Plan.

### ***City of Sacramento Zoning Ordinance***

The Natomas Crossing EIR included a discussion of the consistency of the Natomas Crossing project with the City’s Zoning Ordinance. The discussion explained how some elements of the Natomas Crossing project would have been inconsistent with the Employment Center zoning on the Natomas Crossing project site at the time the EIR was prepared and that in response the project applicant had requested that the Natomas Crossing project site be appropriately rezoned. In particular, the project applicant had requested that zoning on Quad C be changed to SC (42.6 acres) and EC-50 (10.3 acres).

The zoning change proposed for Quad C discussed above was granted with approval of the Natomas Crossing project in 2009, and zoning on the project site has not changed in the interim. The SC zone allows multi-family residential uses with the approval of a Conditional Use Permit (CUP) while the EC-50 allows multi-family residential uses by right. The project applicant has requested a CUP to allow multi-family residential uses on the portion of the project site zoned SC. With the approval of the CUP, the proposed project would be consistent with the City’s Zoning Ordinance.

### **Compatibility with Existing Adjacent Land Uses**

The Natomas Crossing EIR also included a discussion of the compatibility of the Natomas Crossing project with existing adjacent land uses. The Natomas Crossing EIR determined that retail commercial development proposed for Quad C would have been compatible with existing residential development to the east across East Commerce Way as smaller retail uses on Quad C would have fronted East Commerce Way while larger retail pads would have been located closer to the freeway, and thus furthest away from the existing residential development.

The proposed project is a two-phase, multi-family residential development project that would be more compatible with the existing residential uses to the east across East Commerce Way than the retail commercial uses proposed on Quad C under the Natomas Crossing project. For this reason, the proposed project would remain compatible with existing adjacent land uses.

## II. Population, Employment and Housing

### Population Growth

The Initial Study prepared for and appended to the Natomas Crossing EIR found that population growth associated with the Natomas Crossing project would not have been substantial as buildout of the project was only anticipated to include up to 180 residential units. Therefore, the impact related to substantial population growth, either directly or indirectly, was determined to be less than significant.

The proposed project would include 472 residential units to be constructed in two phases, which represents an increase of approximately 260 percent more units than previously anticipated under the Natomas Crossing project. The 2030 General Plan included assumptions for the amount of growth that will occur within the Policy Area. The General Plan assumed that an additional 97,000 dwelling units, 136,000 jobs, and 195,000 residents would be added to the City by 2030. The 2030 General Plan Master EIR identified, estimated, and evaluated population and housing changes that would have been caused by development of the 2030 General Plan and that would have had the potential to cause physical environmental effects. The Land Use, Population, and Housing analysis in the 2030 General Plan Master EIR (Chapter 3) provided a detailed discussion of how the City reached these assumptions and the methodology used to determine a realistic level of growth for the City.

According to the California Department of Finance, the average household size in the City of Sacramento in 2009 was approximately 2.70 persons per unit.<sup>1</sup> As a result, the proposed project is expected to add approximately 1,274 persons residents to the City based on the average household size in the City at the time the Natomas Crossing project was approved in 2009. This projected population is consistent with the cumulative population growth assumed in the 2030 General Plan and Master EIR. The project would be consistent with the General Plan land use designation (Regional Commercial), which permits multi-family residential units. In addition, it would not require any change to the project site's current zoning (SC-PUD and EC-50-PUD). Therefore, the proposed project would continue to have a less-than-significant impact with respect to population growth. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### Displacement of Housing or People

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project would not have displaced existing housing as the Natomas Crossing project site was not developed with residential uses. Therefore, the impact related to the displacement of existing housing was found to be less than significant.

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<sup>1</sup> California Department of Finance. 2012. Report E-8: Historical Population and Housing Estimates for Cities, Counties, and the State, 2000-2010.

The project site is presently vacant, and thus would also not displace existing housing. As a result, the proposed project would continue to have a less-than-significant impact with respect to the displacement of housing. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Summary

The proposed project would not have any significant effects relating to population, employment and housing that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to population, employment and housing.

## III. Seismicity, Soils, and Geology

### Seismic Hazards

The Initial Study prepared for and appended to the Natomas Crossing EIR found that with adherence to existing regulations and requirements regulating excavation and grading activities, the Natomas Crossing project would not have resulted in or exposed people to potential impacts involving seismic hazards. Therefore, this was considered less than significant.

The proposed project would also adhere to the regulations and requirements regulating excavation and grading activities that were in place at the time the Natomas Crossing project was approved in 2009. Construction of the proposed project would adhere to those standards at a minimum, and in some cases, would adhere to more stringent building standards that have been enacted since 2009. As a result, the proposed project would also not result in or expose people to potential impacts involving seismic hazards, and this impact would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### Erosion, Unstable Soils, Topography

The Initial Study prepared for and appended to the Natomas Crossing EIR found that construction and grading activities associated with the Natomas Crossing project could have resulted in erosion. In addition, the Natomas Crossing project site, including Quad C, contained expansive soils and was susceptible to liquefaction. However, with the implementation of Natomas Crossing EIR Mitigation Measure MM-1, which would have required the preparation of site specific investigations to evaluate specific soil conditions at the location of each individual structure, impacts with respect to erosion, expansive soils, and liquefaction would have been reduced to a less-than-significant level.

Construction and grading activities associated with the proposed project also have the potential to result in erosion. In addition, as site conditions on Quad C have not changed since certification of the 2009 EIR, the proposed project could also be exposed to hazards

associated with expansive soils and liquefaction. However, with implementation Natomas Crossing EIR Mitigation Measure MM-1, this impact would also be reduced to a less-than-significant level. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## **Subsidence**

The Initial Study prepared for and appended to the Natomas Crossing EIR found that excavation and construction activities associated with the Natomas Crossing project would not have required dewatering as excavation activities would have occurred above the minimum groundwater level. As a result, the impact with respect to subsidence due to dewatering was considered to be less than significant.

Groundwater levels on Quad C have not changed since certification of the 2009 EIR. Building techniques for the proposed project would not require extensive or deep excavation for building foundations or utility infrastructure. As a result, excavation and grading activities associated with the proposed project would also not require dewatering, and the impact with respect to subsidence due to dewatering would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## **Unique Geologic or Physical Features**

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project site, including Quad C, did not contain unique geologic or physical features as the site had been previously mass graded. As a result, the impact with respect to the loss of unique geologic or physical features was considered to be less than significant.

Conditions on Quad C have not changed since certification of the 2009 EIR. As a result, the proposed project would not result in the loss of unique geologic or physical features, and the impact of the proposed project with respect to the loss of unique geologic or physical features would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## **Summary**

The proposed project would not have any significant effects relating to seismicity, soils, and geology that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to seismicity, soils, and geology.

## IV. Water

### Risk of Flooding

In December 2008, the Flood Insurance Rate Maps (FIRM) for the Natomas Basin were reclassified by the Federal Emergency Management Agency (FEMA). The Natomas Basin, which included the Natomas Crossing project site, was reclassified as within the 100-year flood hazard zone (AE Zone) after the U.S. Army Corps of Engineers (USACE) decertified the levee system protecting the Natomas Basin. The remap required that all new construction or substantial improvements to structures had to meet a 33-foot base flood elevation requirement. Prior to the USACE decertification, the Sacramento Area Flood Control Agency (SAFCA) implemented the Natomas Levee Improvement Program (NLIP) to upgrade the levee system protecting the Natomas Basin. Construction of the NLIP began in 2007. However, the remap limited construction in the Natomas Basin to such an extent that it served as a *de facto* building moratorium. The *de facto* building moratorium remained in effect when the Natomas Crossing EIR was certified in 2009.

Levee improvements have been ongoing under the SAFCA NLIP, continuing from 2007 to the present. In April 2015, FEMA determined that SAFCA had made sufficient progress in required improvement to the levee system to approve an A99 flood zone designation for the Natomas Basin. An A99 designation is an interim flood zone designation which allows construction in the area if certain conditions (e.g., progress on completion of flood control infrastructure) are met. Following the revised flood designation, development within the Natomas Basin resumed. Consistent with other areas within the Natomas Basin that had been proposed for development prior to the downgrading of the flood zone designation for the Natomas Basin, reclassification to the A99 flood zone designation has led to new development proposals or renewal of previously halted development proposals.

As the applicant for the Natomas Crossing project had not obtained building permits prior to the reclassification of the Natomas Basin in December 2008, the Natomas Crossing EIR found that the project would not have been expected to result in an adverse flooding-related impact as implementation of the project would not have occurred until after improvements to the levee system had been made. However, the Natomas Crossing EIR noted that should the applicant for the Natomas Crossing project decide to pursue the development of the project prior to recertification of the levees, a potentially significant impact would have occurred. However, with the implementation of Natomas Crossing EIR Mitigation Measure 4.5-1(a), which would have prohibited the construction and operation of the Natomas Crossing project until recertification of the levees by SAFCA and FEMA, and Natomas Crossing EIR Mitigation Measure 4.5-1(b), which would have required the project applicant to participate in a funding mechanism such as an assessment district for the purpose of implementing measures that would provide no less than 100-year flood protection including the North Natomas Area, or for that portion of the Natomas Basin requiring re-certification for 100-year flood protection including the Natomas Crossing project site, this impact would have been reduced to a less-than-significant level.

While the Natomas Basin has been reclassified to the A99 flood zone designation, flood risk within the basin remains unchanged. The A99 flood zone allows construction if certain conditions are met.<sup>2</sup> Mandatory flood insurance purchase requirements and floodplain management are required of properties located in Zone A99.<sup>3</sup> At a minimum, projects located within Zone A99 would need to adhere to the floodplain management and building requirements set forth in Section 60.3 of the National Flood Insurance Program (NFIP) regulations, which include, but are not limited to, the following:<sup>4</sup>

- Review all permit applications to determine whether proposed building sites will be reasonably safe from flooding. If a proposed building site is in a flood-prone area, all new construction and substantial improvements shall (i) be designed (or modified) and adequately anchored to prevent flotation, collapse, or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads, including the effects of buoyancy, (ii) be constructed with materials resistant to flood damage, (iii) be constructed with electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding.
- Review subdivision proposals and other proposed new development, including manufactured home parks or subdivisions, to determine whether such proposals will be reasonably safe from flooding. If a subdivision proposal or other proposed new development is in a flood-prone area, any such proposals shall be reviewed to assure that (i) all such proposals are consistent with the need to minimize flood damage within the flood-prone area, (ii) all public utilities and facilities, such as sewer, gas, electrical, and water systems are located and constructed to minimize or eliminate flood damage, and (iii) adequate drainage is provided to reduce exposure to flood hazards.

The proposed project would be required to comply with floodplain management and building requirements of Section 60.3 of the NFIP, consistent with the A99 flood zone designation. Therefore, the impact of the proposed project with respect to the exposure of people and structures on the project site to flood hazards would remain less than significant as Natomas Crossing EIR Mitigation Measures 4.5-1(a) and 4.5-1(b) no longer apply. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

<sup>2</sup> Federal Emergency Management Agency, 2015. Flood Insurance Rate Map, Sacramento County: Map Number 06067C0045J. Available: <https://msc.fema.gov/portal/search?AddressQuery=natomas%2C%20ca#searchresultsanchor>. Accessed March 30, 2020.

<sup>3</sup> Federal Emergency Management Agency, 2014. Adequate Progress on Flood Control Systems: Zone A99 Requirements Summary for State and Local Officials. Available: [https://www.fema.gov/media-library-data/1417370512021-87d10b406536999e03e3f63fe55873f5/Zone\\_A99\\_Fact\\_Sheet.pdf](https://www.fema.gov/media-library-data/1417370512021-87d10b406536999e03e3f63fe55873f5/Zone_A99_Fact_Sheet.pdf). Accessed March 30, 2020.

<sup>4</sup> Federal Emergency Management Agency, 2000. Section 60.3 Flood Plain Management Criteria for Flood Prone Areas. Available: [https://www.fema.gov/media-library-data/20130726-1622-20490-7844/section60\\_3.pdf](https://www.fema.gov/media-library-data/20130726-1622-20490-7844/section60_3.pdf). Accessed March 30, 2020.

## Water Quality - Construction

The Natomas Crossing EIR analyzed impacts to surface waters from development of commercial buildings, roadways, parking lots, and infrastructure, which would require grading, excavation, and other construction-related activities that could cause soil erosion at an accelerated rate during storm events. As described in the EIR, anticipated development on the Natomas Crossing project site would have been required to comply with the requirements of the City's Stormwater Quality Improvement Plan (SQIP) and to obtain coverage under the NPDES Construction General Permit (CGP). Conformance with the CGP would have required the preparation of erosion and sediment control plans to control pollutant discharges through the implementation of best available technology (BAT), that is economically feasible, and best conventional pollutant control technology (BCT) to reduce pollutants. Construction contractors would also have been required to prepare and submit a construction stormwater pollution prevention plan (SWPPP). As anticipated development on the Natomas Crossing project site would have been required to adhere to the above requirements, conformance with which would have reduced potential impacts from construction runoff, this impact was considered less than significant.

The proposed project would be subject to and implement all of the stormwater and erosion prevention requirements described in the Natomas Crossing EIR. The proposed project would implement present-day best management practices (BMPs) for the prevention of impacts to surface waters from construction activities. For this reason, impacts to surface water from construction of the proposed project would be less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Water Quality - Operation

The Natomas Crossing EIR included an analysis of potential impacts to water quality from urban runoff from the Natomas Crossing project site. The Natomas Crossing project would have increased impervious surfaces within the Natomas Crossing project site (from vacant to 90 percent coverage) that would have altered the types and levels of pollutants that could have been present in project site runoff. As described in the EIR, the existing downstream drainage system, including Detention Basin 6-B, had been designed to control urban runoff pollutants and improve water quality by allowing water pollutants to settle out within the detention basin. In addition, the EIR stated that project applicants would have been required to comply with the City's Stormwater Management and Discharge Control Ordinance (Title 13), which required that the Improvement Plans incorporate controls to minimize the operational discharge of pollutants from the Natomas Crossing project site. The proposed stormwater design of Natomas Crossing project site would have met the requirements of the Stormwater Quality Standards for Development Projects to ensure that stormwater runoff would have met the water quality standards identified by the RWQCB for water entering the Sacramento River.<sup>5</sup> The EIR concluded

<sup>5</sup> Sacramento Stormwater Quality Partnership, 2007. *Stormwater Quality Design Manual; for the Sacramento and South Placer Regions*. May 2007. Available: [http://www.beriverfriendly.net/docs/files/File/2007\\_DesignManual/SWQ\\_DesignManual\\_2007.pdf](http://www.beriverfriendly.net/docs/files/File/2007_DesignManual/SWQ_DesignManual_2007.pdf). Accessed March 30, 2020.

that with conformance of the Natomas Crossing project with the regulations and standards described above, the potential for adverse impacts from urban runoff generated by anticipated development on the Natomas Crossing project site would have been minimized, and these impacts were considered less than significant.

The proposed project would develop the project site with impermeable surfaces to levels similar to those anticipated for development analyzed in the EIR. The proposed project would be designed to direct stormwater runoff to the drainage canal, along the western boundary of the project site, which would drain to Detention Basin 6-B where runoff would settle and undergo processes assumed for development on the project site in the EIR. Stormwater runoff would not be directed to the nearby I-5 right-of-way. Approximately 78 percent of the project site would be covered in impermeable surface area, relative to the 90 percent coverage anticipated for development of the project site in the EIR, and thus would not require the full stormwater drainage capacity available to the project site. For this reason, treatment capacity of urban runoff in Detention Basin 6-B would be commensurately adequate to accommodate urban runoff from the proposed project. In addition, the proposed project would be subject to and implement all of the regulatory requirements described in the EIR, which would minimize potentially adverse impacts from urban runoff. For these reasons, impacts to surface water during operation of the proposed project would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Groundwater

The Initial Study prepared and appended to the Natomas Crossing EIR concluded that construction of the Natomas Crossing project would not have adversely affected the quantity or quality of groundwater underneath the Natomas Crossing project site as project construction would not have required excavation to depths where groundwater would be present. This conclusion was based on reported groundwater levels in the vicinity of the City of Sacramento being stable at between 20 feet above and 40 feet below mean sea level (msl). As a result, this impact was considered to be less than significant.

It is not anticipated that groundwater would be encountered during construction of the proposed project. However, if groundwater is encountered during construction, dewatering would be necessary. All dewatering activities would comply with application requirements established by the Central Valley Regional Water Quality Control Board (CVRWQB) to ensure that dewatering activities would not result in adverse changes to groundwater. Ground-disturbing construction activities would include trenching for utility connections, grading, and other minimally invasive earthmoving, and would not involve substantial excavation. The construction processes for the proposed project would be the same as those processes anticipated and analyzed in the EIR. Accordingly, this impact would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Summary

The proposed project would not have any significant effects relating to water that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to water.

## V. Air Quality

The proposed project is a residential development that would construct up to 472 units in two phases. Emissions of reactive organic gases (ROG), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and particulate matter (PM) associated with both construction and operation of the proposed project were evaluated to determine whether the proposed project would result in a significant impact from emissions of criteria air pollutants. A health risk assessment was also completed to determine project impacts to off-site and on-site sensitive receptors. Overall, with implementation of conditions of approval, the proposed project would result in a less than significant impact from emissions of criteria air pollutants and exposure of sensitive receptors to toxic air contaminants (TACs). These findings demonstrate that the proposed project would have a similar or lesser impact to air quality compared to the findings of the Natomas Crossing EIR, as discussed below.

The Natomas Crossing EIR concluded that the impacts associated with the Natomas Crossing project's long-term increase in CO emissions, as well as the project's cumulative contribution to local air quality conditions, would be less than significant. The analysis determined that impacts related to short-term increases of construction-generated emissions of criteria air pollutants, short-term increases in fugitive dust, exposure of sensitive receptors to toxic air contaminants, and exposure of sensitive receptors to odors would have been significant; however, the impacts would have been reduced to less than significant levels with the implementation of mitigation measures identified in the EIR.

### Short-Term Criteria Pollutant Emissions

In the Natomas Crossing EIR, Quadrant C was assumed to be developed in four separate phases, each of which assumed 12 months of construction. Construction of Phases I and III were assumed to begin in 2011, followed by construction of Phase II in 2012, and construction of Phase IV in 2013. The Natomas Crossing EIR estimated project emissions using the URBEMIS2007 computer program and determined that the estimated maximum daily emissions of NO<sub>x</sub> on Quad C during construction of the Natomas Crossing project would have exceeded the significance threshold for NO<sub>x</sub> established by the Sacramento Metropolitan Air Quality Management District (SMAQMD) that was applicable at the time the EIR was prepared. However, with the implementation of the following Natomas Crossing EIR Mitigation Measures, this impact would have been reduced to a less-than-significant level: Mitigation Measure 4.4-1(a) would have required the project's heavy duty construction equipment to achieve a project-wide fleet-average NO<sub>x</sub> reduction of 20 percent and a particulate reduction of 45 percent compared to the most recent CARB

fleet average at the time of construction; Mitigation Measure 4.4-1(b) would have required the project applicant to submit a comprehensive inventory of all off-road construction equipment; Mitigation Measure 4.4-1(c) would have required that emissions from off-road, diesel-powered equipment used on the project site not exceed 40 percent opacity for more than three minutes in any one hour; and Mitigation Measure 4.4-1(d) would have required the applicant to pay a mitigation fee to the SMAQMD to offset any remaining construction-generated daily NO<sub>x</sub> emissions in excess of the SMAQMD's significance threshold of 85 pounds/day.

Since the publication of the Natomas Crossing EIR, the SMAQMD has revised and updated their recommended air quality model and thresholds of significance. The recommended model is the newest version of the California Emissions Estimator Model (CalEEMod). Air quality construction and operational-significance thresholds now include both PM fractions that are 10 microns or less in diameter (PM<sub>10</sub>) and 2.5 microns or less in diameter (PM<sub>2.5</sub>). Due to air quality non-attainment status, the SMAQMD CEQA guidance, project-related construction and operational emissions that exceed zero pounds per day of PM<sub>10</sub> and PM<sub>2.5</sub> would result in a significant impact, unless all feasible Best Available Control Technologies/Best Management Practices (BACT/BMPs) are implemented. After implementation of all feasible SMAQMD BACT/BMPs, which are listed below, the SMAQMD's significance threshold for PM<sub>10</sub> and PM<sub>2.5</sub> allows 80 pounds per day (14.6 tons per year) of PM<sub>10</sub> and 82 pounds per day (15 tons per year) of PM<sub>2.5</sub>.<sup>6</sup> Since the proposed project would implement all feasible SMAQMD's BACT/BMPs during construction and operation, SMAQMD's 80 pounds per day (14.6 tons per year) of PM<sub>10</sub> and 82 pounds per day (15 tons per year) of PM<sub>2.5</sub> significance thresholds would apply.

To evaluate criteria pollutant emissions that would result from the proposed project, construction emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were modeled using CalEEMod 2016.3.2 and EMFAC2017 on-road vehicle emission factors. As discussed above, the proposed project is expected to be constructed in two phases: Phase I and Phase II. It was assumed that construction of Phase I would begin in Fall 2020 and would be completed by Fall 2022, followed by construction of Phase II which would begin in Fall 2022 and be completed by Spring 2024. CalEEMod defaults for construction equipment and construction-worker trip generation rates were used. Model output files are included in **Attachment 1**. The results of modeling for Phase I and Phase II unmitigated emissions are shown below in **Tables 4 and 5**.

<sup>6</sup> Sacramento Metropolitan Air Quality Management District (SMAQMD). 2015. *CEQA Guide, SMAQMD Thresholds of Significance*. Updated May 2015. Available: <http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf>. Accessed on April 13, 2020.

**TABLE 4  
ESTIMATED UNMITIGATED PHASE I CONSTRUCTION EMISSIONS**

| <b>Construction Year</b>          | <b>NO<sub>x</sub>,<br/>ppd</b> | <b>PM<sub>10</sub>,<br/>ppd</b> | <b>PM<sub>10</sub>,<br/>tpy</b> | <b>PM<sub>2.5</sub>,<br/>ppd</b> | <b>PM<sub>2.5</sub>,<br/>tpy</b> |
|-----------------------------------|--------------------------------|---------------------------------|---------------------------------|----------------------------------|----------------------------------|
| 2020                              | 42.5                           | 20.4                            | 0.1                             | 12.0                             | 0.1                              |
| 2021                              | 24.8                           | 7.8                             | 0.3                             | 4.5                              | 0.2                              |
| 2022                              | 19.1                           | 2.5                             | 0.1                             | 1.2                              | 0.1                              |
| SMAQMD Thresholds of Significance | 85                             | 0                               | 0                               | 0                                | 0                                |
| Exceeds SMAQMD Thresholds?        | No                             | Yes                             | Yes                             | Yes                              | Yes                              |

## NOTES:

ppd = Pounds per day; tpy = Tons per year

- 1 On-site construction emissions for summer, winter and annual periods were estimated with CalEEMod 2016.3.2; on-road, off-site emissions were estimated with EMFAC2017. See Attachment 1 for details. Unmitigated emissions do not include any mitigation measures identified in the Natomas Crossing EIR.
- 2 SMAQMD has established a zero emissions threshold for PM10 and PM2.5 when projects do not implement their Best Available Control Technologies/Best Management Practices (BACT/BMPs). If all feasible BACT/BMPs are applied, then the significance thresholds for PM10 and PM2.5 are 80 pounds per day/14.6 tons per year and 82 pounds per day/15 tons per year, respectively.

SOURCE: ESA, 2020.

**TABLE 5  
ESTIMATED UNMITIGATED PHASE II CONSTRUCTION EMISSIONS**

| <b>Construction Year</b>          | <b>NO<sub>x</sub>,<br/>ppd</b> | <b>PM<sub>10</sub>,<br/>ppd</b> | <b>PM<sub>10</sub>,<br/>tpy</b> | <b>PM<sub>2.5</sub>,<br/>ppd</b> | <b>PM<sub>2.5</sub>,<br/>tpy</b> |
|-----------------------------------|--------------------------------|---------------------------------|---------------------------------|----------------------------------|----------------------------------|
| 2022                              | 33.1                           | 19.8                            | 0.2                             | 11.5                             | 0.1                              |
| 2023                              | 16.7                           | 2.0                             | 0.2                             | 1.0                              | 0.1                              |
| 2024                              | 9.6                            | 0.6                             | 0.01                            | 0.5                              | 0.004                            |
| SMAQMD Thresholds of Significance | 85                             | 0                               | 0                               | 0                                | 0                                |
| Exceeds SMAQMD Threshold?         | No                             | Yes                             | Yes                             | Yes                              | Yes                              |

## NOTES:

ppd = Pounds per day; tpy = Tons per year

- 1 On-site construction emissions for summer, winter and annual periods were estimated with CalEEMod 2016.3.2; on-road, off-site emissions were estimated with EMFAC2017. See Attachment 1 for details. Unmitigated emissions do not include any mitigation measures identified in the Natomas Crossing EIR.
- 2 SMAQMD has established a zero emissions threshold for PM10 and PM2.5 when projects do not implement their Best Available Control Technologies/Best Management Practices (BACT/BMPs). If all feasible BACT/BMPs are applied, then the significance thresholds for PM10 and PM2.5 are 80 pounds per day/14.6 tons per year and 82 pounds per day/15 tons per year, respectively.

SOURCE: ESA, 2020.

As shown in Tables 4 and 5, construction emissions associated with Phase I and Phase II of the proposed project would exceed the thresholds for both PM<sub>10</sub> and PM<sub>2.5</sub> established by the SMAQMD. However, with the use of Tier 4 Final construction equipment, which would be considered BACT and required as a condition of approval, construction emissions associated with Phase I and Phase II of the proposed project would not exceed

the SMAQMD's thresholds of significance, as shown below in **Tables 6** and **7**. In addition, the proposed project would be required to implement Natomas Crossing EIR Mitigation Measures 4.4-1(a) through 4.4-1(c), which would further reduce NO<sub>x</sub> emissions. Implementation of Natomas Crossing EIR Mitigation Measure 4.4-1(d) would not be required as the NO<sub>x</sub> emissions associated with the proposed project would not exceed 85 pounds per day.

**TABLE 6  
ESTIMATED MITIGATED PHASE I CONSTRUCTION EMISSIONS**

| <b>Construction Year</b>          | <b>NO<sub>x</sub>, ppd</b> | <b>PM<sub>10</sub>, ppd</b> | <b>PM<sub>10</sub>, tpy</b> | <b>PM<sub>2.5</sub>, ppd</b> | <b>PM<sub>2.5</sub>, tpy</b> |
|-----------------------------------|----------------------------|-----------------------------|-----------------------------|------------------------------|------------------------------|
| 2020                              | 2.1                        | 8.3                         | 0.04                        | 4.6                          | 0.02                         |
| 2021                              | 5.9                        | 3.1                         | 0.2                         | 1.6                          | 0.1                          |
| 2022                              | 5.7                        | 1.8                         | 0.1                         | 0.5                          | 0.02                         |
| SMAQMD Thresholds of Significance | 85                         | 80                          | 14.6                        | 82                           | 15                           |
| Exceeds SMAQMD Threshold?         | No                         | No                          | No                          | No                           | No                           |

NOTES:

ppd = Pounds per day; tpy = Tons per year

- 1 On-site construction emissions for summer, winter and annual periods were estimated with CalEEMod 2016.3.2; on-road, off-site emissions were estimated with EMFAC2017. See Attachment 1 for details. Mitigated emissions include use of Tier 4 Final construction equipment.
- 2 SMAQMD has established a zero emissions threshold for PM<sub>10</sub> and PM<sub>2.5</sub> when projects do not implement their Best Available Control Technologies/Best Management Practices (BACT/BMPs). If all feasible BACT/BMPs are applied, then the significance thresholds for PM<sub>10</sub> and PM<sub>2.5</sub> are 80 pounds per day/14.6 tons per year and 82 pounds per day/15 tons per year, respectively.

SOURCE: ESA, 2020.

**TABLE 7  
ESTIMATED MITIGATED PHASE II CONSTRUCTION EMISSIONS**

| <b>Construction Year</b>          | <b>NO<sub>x</sub>, ppd</b> | <b>PM<sub>10</sub>, ppd</b> | <b>PM<sub>10</sub>, tpy</b> | <b>PM<sub>2.5</sub>, ppd</b> | <b>PM<sub>2.5</sub>, tpy</b> |
|-----------------------------------|----------------------------|-----------------------------|-----------------------------|------------------------------|------------------------------|
| 2022                              | 2.1                        | 8.3                         | 0.1                         | 4.6                          | 0.04                         |
| 2023                              | 4.5                        | 1.3                         | 0.1                         | 0.4                          | 0.04                         |
| 2024                              | 1.2                        | 0.2                         | 0.003                       | 0.1                          | 0.001                        |
| SMAQMD Thresholds of Significance | 85                         | 80                          | 14.6                        | 82                           | 15                           |
| Exceeds SMAQMD Threshold?         | No                         | No                          | No                          | No                           | No                           |

NOTES:

ppd = Pounds per day; tpy = Tons per year

- 1 On-site construction emissions for summer, winter and annual periods were estimated with CalEEMod 2016.3.2; on-road, off-site emissions were estimated using EMFAC2017. See Attachment 1 for details. Mitigated emissions include use of Tier 4 Final construction equipment.
- 2 SMAQMD has established a zero emissions threshold for PM<sub>10</sub> and PM<sub>2.5</sub> when projects do not implement their Best Available Control Technologies/Best Management Practices (BACT/BMPs). If all feasible BACT/BMPs are applied, then the significance thresholds for PM<sub>10</sub> and PM<sub>2.5</sub> are 80 pounds per day/14.6 tons per year and 82 pounds per day/15 tons per year, respectively.

SOURCE: ESA, 2020.

As a result, the impact of the proposed project with regard to short-term emissions of criteria pollutants during construction would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## Fugitive Dust

The Natomas Crossing EIR determined that fugitive dust emissions associated with the construction of the Natomas Crossing project would have contributed to localized concentrations of PM at nearby sensitive receptor locations. However, with the implementation of Natomas Crossing EIR Mitigation Measure 4.4-2, which would have required the preparation of a dust control plan, this impact would have been reduced to a less-than-significant level.

The proposed project would also prepare a dust control plan as required by Natomas Crossing EIR Mitigation Measure 4.4-2. Therefore, the impact of the proposed project with regard to fugitive dust emissions during construction would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## Long-Term Criteria Pollutant Emissions

The Natomas Crossing EIR determined that the estimated maximum daily emissions of ozone-precursor pollutants (i.e., ROG and NO<sub>x</sub>) during operation of the Natomas Crossing project would have exceeded the significance thresholds for reactive organic gases (ROG) and NO<sub>x</sub> established by SMAQMD that were applicable at the time the EIR was prepared. However, with the implementation of Natomas Crossing EIR Mitigation Measures 4.4-3, which required the preparation of an Air Quality Mitigation Plan (AQMP), this impact would have been reduced to a less-than-significant level.

Since the publication of the Natomas Crossing EIR, the applicant has developed the North Natomas Regional Retail and Medical Complex AQMP which would be applicable to the proposed project. The AQMP includes measures regarding the amount of bike parking, providing a connected pedestrian network, minimizing pedestrian barriers, providing a pedestrian pathway through the parking lot, traffic calming measures, and installing Energy Star-labeled roof materials. Adherence to the AQMP would reduce overall NO<sub>x</sub> and ROG emissions by 15 percent.

To evaluate criteria pollutant emissions from the proposed project, operational emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were modeled using CalEEMod 2016.3.2. **Table 8** shows estimated emissions that would result from operation of the proposed project, after implementation of the AQMP measures. As shown in Table 8, emissions of criteria air pollutants associated with the proposed project would not exceed the SMAQMD thresholds of significance.

**TABLE 8  
ESTIMATED OPERATIONAL EMISSIONS**

| <b>Phase</b>                       | <b>ROG,<br/>ppd</b> | <b>NO<sub>x</sub>,<br/>ppd</b> | <b>PM<sub>10</sub>,<br/>ppd</b> | <b>PM<sub>10</sub>,<br/>tpy</b> | <b>PM<sub>2.5</sub>,<br/>ppd</b> | <b>PM<sub>2.5</sub>,<br/>tpy</b> |
|------------------------------------|---------------------|--------------------------------|---------------------------------|---------------------------------|----------------------------------|----------------------------------|
| Area                               | 15.9                | 0.4                            | 0.2                             | 0.03                            | 0.2                              | 0.03                             |
| Energy                             | 0.1                 | 1.2                            | 0.1                             | 0.02                            | 0.1                              | 0.02                             |
| Mobile                             | 5.4                 | 19.2                           | 17.3                            | 3.0                             | 4.7                              | 0.8                              |
| <b>Total Operational Emissions</b> | <b>21.4</b>         | <b>20.8</b>                    | <b>17.6</b>                     | <b>3.0</b>                      | <b>5.1</b>                       | <b>0.9</b>                       |
| SMAQMD Thresholds of Significance  | 65                  | 65                             | 80                              | 14.6                            | 82                               | 15                               |
| Exceeds SMAQMD Threshold?          | No                  | No                             | No                              | No                              | No                               | No                               |

## NOTES:

ppd = Pounds per day; tpy = Tons per year

1 Operational emissions for summer, winter, and annual periods were estimated with CalEEMod 2016.3.2. CalEEMod estimated on-road emissions were calculated based on EMFAC2017 emission factors. See Attachment 1 for details. Emissions estimates account for emissions reductions that would be achieved through compliance with the AQMP.

SOURCE: ESA, 2020.

For this reason, the impact of the proposed project with regard to long-term emissions of criteria pollutants during operation would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

### Carbon Monoxide Emissions

At the time of the preparation of the Natomas Crossing EIR, the SMAQMD had developed screening procedures to analyze projects that generated up to approximately 3,000 peak hour trips. However, the traffic analysis for the Natomas Crossing EIR estimated that the Natomas Crossing project would have generated approximately 5,074 peak-hour trips. Therefore, the Natomas Crossing EIR followed a detailed intersection-level analysis developed by the Bay Area Air Quality Management District (BAAQMD) for mobile-source CO concentrations using CALINE4 model which was appropriate for this analysis. The CO analysis determined that the estimated vehicle trips generated by the Natomas Crossing project would not have resulted in a significant impact with regard to CO concentrations.

The 2019 SMAQMD CEQA Guide includes screening criteria to conservatively analyze potential CO impacts and identify whether CO dispersion modeling is necessary. The screening criteria are divided into two tiers; if the first tier of screening criteria is not met, then the second tier shall be examined. According to SMAQMD, a project would not result in a significant CO impact if one of the following tiers is met:<sup>7</sup>

<sup>7</sup> Sacramento Metropolitan Air Quality Management District (SMAQMD). 2019. Guide to Air Quality Assessment in Sacramento County, Chapter 4. Updated July 2019. Available: [www.airquality.org/LandUseTransportation/Documents/Ch4OperationalFINAL8-2016.pdf](http://www.airquality.org/LandUseTransportation/Documents/Ch4OperationalFINAL8-2016.pdf). Accessed April 7, 2020.

## 1. First Tier

1. Traffic generated by the project will not result in deterioration of intersection LOS or LOS E or F; and
2. The project will not contribute additional traffic to an intersection that already operates at LOS E or F.

## 2. Second Tier

1. The project would not result in an affected intersection experiencing more than 31,600 vehicles per day; The project would not contribute traffic to a tunnel, parking garage, bridge underpass, urban street canyon, or below-grade roadway; or other location where horizontal or vertical mixing of air will be substantially limited; and
2. 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).

The proposed project meets the SMAQMD's First Tier screening criteria. Intersections that would be affected by the project include (1) Arena Boulevard/East Commerce Way, (2) East Commerce Way/Amelia Earhart, (3) East Commerce Way/New Access, and (4) East Commerce Way/Natomas Crossing Drive. Traffic analysis determined that under the approved Quad C project, all affected intersections would operate at LOS D or better during both AM and PM peak hours. Furthermore, the proposed project, including approved development on the remainder of Quad C, would not result in a reduced LOS and these affected intersections would operate at LOS D or better during both AM and PM peak hours.<sup>8</sup> Therefore, site-specific CO dispersion modeling is not necessary and the proposed project would not generate CO emissions that would exceed the thresholds of significance.

For this reason, the impact of the proposed project with regard to CO emissions would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## Toxic Air Contaminants

### ***Short Term Construction***

The Natomas Crossing EIR determined that short-term exposure to construction-generated emissions of TACs was not considered adverse. Health-related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. For residential land uses, the calculation of cancer risk associated with exposure to TACs are typically calculated based on a 70-year period of exposure. With overall construction of the Natomas Crossing project occurring over a period of approximately five years, the EIR found out that construction activities would have only constituted approximately seven percent of the total exposure period typically applied

<sup>8</sup> KD Anderson & Associates, Inc. 2019. *Natomas Crossing Quad C & Quad D Phasing Operational Analysis*. June 17, 2019.

for the calculation of risk. In addition, EIR stated that the use of diesel-powered construction equipment would have been temporary and episodic and would have occurred over a relatively large area. For these reasons, the impact to nearby sensitive receptors from TACs generated during construction on Quad C was considered less than significant.

Similar to the Natomas Crossing project, receptors near the project site would also be exposed to short term emissions of TACs resulting from use of diesel-powered equipment during construction. The primary TAC emitted during construction of the proposed project would be diesel particulate matter (DPM) in exhaust generated from operation of off-road diesel construction equipment (e.g., excavators, loaders, cranes, graders) and on-road diesel heavy-duty vehicles. In order to determine the excess cancer risk and non-cancer chronic risk associated with construction, a screening-level health risk assessment was conducted using conservative assumptions to estimate worst-case impacts.

The AERSCREEN (version 16216) dispersion model was used to estimate maximum annual DPM concentrations. AERSCREEN is the screening version of AERMOD (version 19191) and uses worst-case meteorology to predict conservative concentrations. The dispersion modeling used average annual DPM emissions, sensitive receptor locations, and construction emission sources. For the proposed project, two sources were used to represent the construction and haul truck activities:

- A conservative representation of the on-site construction equipment within the project site modeled as a rectangular area source with an internal vertical dimension of 1.4 meters.<sup>9</sup>
- A conservative representation of vendor diesel trucks transporting construction materials along East Commerce Way to and from I-5, modeled as a series of area sources along the roadway.

The above sources were modeled with an emission rate of one gram per second to determine the worst-case dispersion factor (unit concentration) occurring at the nearest sensitive receptor within a 1000-foot radius. The maximum impact or maximum exposed individual at a residence (MEIR) was determined using this worst-case dispersion factor and annual DPM average emissions from CalEEMod to represent the “worst-case” exposure scenario. To evaluate the excess cancer and chronic health risks from the modeled DPM concentrations, methodologies from Office of Environmental Health Hazard Assessment (OEHHA) health risk assessment guidance<sup>10</sup> were used to calculate the potential cancer risk and chronic hazard index. Modeling assumptions, OEHHA equations, and the health impact calculations are detailed in Attachment 1.

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<sup>9</sup> Bay Area Air Quality Management District, San Francisco Department of Public Health, San Francisco Planning Department, 2012. The San Francisco Community Risk Reduction Plan: Technical Support Documentation December 2012.

<sup>10</sup> Office of Environmental Health Hazard Assessment, 2015. *Air Toxics Hot Spots Program – Risk Assessment Guidelines*, February 2015.

The proposed project would be developed in two phases. During Phase I of construction, the maximally exposed individual receptor (MEIR) would be located across East Commerce Way, 160 feet to the east of the project site. Following the completion of construction of Phase I, it was assumed that Phase II of construction would begin, concurrent with the beginning of Phase I operations. During Phase II of construction, the closest sensitive receptor (MEIR) would be a new resident of Phase I and located as close as 50 south of Phase II construction activities. The residence located across East Commerce Way (MEIR during Phase I) would continue to be exposed during Phase II construction, to a lesser extent, but was nonetheless analyzed for Phase II impacts. Results of the analysis for both receptors are summarized in **Tables 9** and **10** below.

**TABLE 9**  
**MAXIMUM INCREASE IN RISK FOR EXISTING OFF-SITE SENSITIVE RECEPTOR EASTON PHASE I**

| Sensitive Receptor               | Maximum Cancer Risk (# in one million) |                         | Non-Cancer Chronic Hazard Index |                         |
|----------------------------------|--|-------------------------|---------------------------------|-------------------------|
|                                  | Project                                | Project with Mitigation | Project                         | Project with Mitigation |
| Off-site Child Residence         | 30.8                                   | 1.5                     | 0.02                            | 0.001                   |
| BAAQMD Threshold of Significance | 10                                     | 10                      | 1.0                             | 1.0                     |
| Exceeds Threshold?               | Yes                                    | No                      | No                              | No                      |

NOTE: See Attachment 1 for the Health Risk Assessment calculations.

**TABLE 10**  
**MAXIMUM INCREASE IN RISK FOR NEW PHASE I SENSITIVE RECEPTOR)**

| Sensitive Receptor                | Maximum Cancer Risk (# in one million) |                         | Non-Cancer Chronic Hazard Index |                         |
|-----------------------------------|--|-------------------------|---------------------------------|-------------------------|
|                                   | Project                                | Project with Mitigation | Project                         | Project with Mitigation |
| Off-site Child Residence          | 25.3                                   | 1.4                     | 0.03                            | 0.002                   |
| BAAQMD Thresholds of Significance | 10                                     | 10                      | 1.0                             | 1.0                     |
| Exceeds Threshold?                | Yes                                    | No                      | No                              | No                      |

NOTE: See Attachment 1 for the Health Risk Assessment calculations.

The SMAQMD has not adopted thresholds of significance for health risks from construction; therefore, results of the HRA were compared to the thresholds of significance adopted by SMAQMD for operational cancer risk and are used by other air districts for construction risk such as the BAAQMD.<sup>11</sup> These HRA thresholds are

<sup>11</sup> Bay Area Air Quality Management District (BAAQMD). 2017. *California Environmental Quality Act Air Quality Guidelines*. Updated May 2017. Available: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed on April 13, 2020.

appropriate for this analysis. As shown in Tables 9 and 10, the maximum cancer risk, from unmitigated emissions, would exceed the significance thresholds, but the chronic hazard index would not, for both receptors. This finding represents a significant impact relative to the exposure of sensitive receptors to substantial pollutant concentrations.

As discussed above, the proposed project would be required to utilize Tier 4 Final construction equipment as a condition of approval. In addition, the proposed project would also implement Natomas Crossing EIR Mitigation Measures 4.4-1(a) thru 4.4-1(c) and 4.4-2. Implementation of these measures would decrease the maximum increase in cancer for the existing off-site resident and the new resident of Phase I. Additionally, these measures would reduce the non-cancer chronic hazard index for both receptors. Therefore, the impact to sensitive receptors would not exceed the significance thresholds for either phase of construction and the impact would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

### ***Long-Term Operation – Stationary Sources***

The Natomas Crossing EIR determined that long-term exposure to emissions of TACs from stationary sources, such as gasoline stations and dry cleaning establishments, would not have been considered adverse as these sources would have been subject to SMAQMD rules and regulations. As a result, the impact to nearby sensitive receptors from TACs during operation was considered less than significant.

The proposed project does not include gasoline stations and dry cleaning establishments. The proposed project would result in limited operational activities that would generate TAC emissions including operation of resident-owned diesel and gasoline fueled vehicles. These emissions would have negligible associated health risks to existing sensitive receptors in the area. Therefore, impacts to sensitive receptors resulting from operation of the proposed project would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

### ***Long-Term Operation – Mobile Sources***

The Natomas Crossing EIR determined that predicted cancer risks at proposed residential land uses on the Natomas Crossing project site could have exceeded SMAQMD's screening criteria in place at the time the EIR was prepared. However, with the implementation of Natomas Crossing EIR Mitigation Measure 4.4-5(a), which would have required the preparation of a health risk analysis, and Mitigation Measure 4.4-5(b), which would have required the applicant to plant vegetation (e.g., trees) between proposed on-site sensitive land uses and the I-5 corridor, this impact would have been reduced to a less-than-significant level.

SMAQMD and CARB guidance recommends that sensitive land uses not be located in an area that exceed the SMAQMD screening criteria for cancer risks associated with TACs. If sensitive land uses are to be located within 200 feet from I-5, a more detailed

assessment of potential health risks shall be required. Residential areas are considered sensitive to air quality conditions as compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with greater exposure to ambient air quality conditions. In addition, sensitive individuals such as children, the elderly, and those with underlying health conditions could be present at a residence. The proposed project would locate residential land uses approximately 165 feet from I-5; therefore, a mobile source air toxics analysis was performed to determine the impact of DPM and TOG emissions from both I-5 and I-80 to sensitive receptors on the project site.

A Mobile Source Air Toxics Analysis (MAST) was conducted for the proposed project, which satisfies the requirement of preparing a health risk analysis listed in Natomas Crossing EIR Mitigation Measure 4.4-5(a). Detailed methodology, assumptions, and results of the mobile source air toxics analysis are described in **Attachment 2**. The MSAT analysis measured health risk and PM<sub>2.5</sub> concentrations at various locations on the project site from I-5, which is located adjacent to the project site, and I-80, which is located about three-quarters of a mile south of the project site. The MEIR to mobile source air toxic emissions from these facilities would be at the southwestern corner of the project site, approximately 165 feet from I-5 and 3,700 feet from I-80.

Specifically, the MSAT analysis measured the combined effect, or cumulative effect, mobile source emissions from multiple vehicles traveling along I-5 and I-80 at the MEIR. While the SMAQMD does not have a specific recommended threshold of significance for cumulative risk impacts, other air districts have developed such thresholds. The Bay Area Air Quality Management District (BAAQMD) suggests a cumulative cancer risk threshold of 100 cancers in a million from all local sources, and a cumulative PM<sub>2.5</sub> threshold of 0.8 µg/m.<sup>12</sup> The BAAQMD threshold was identified as reasonable and appropriate and used for this analysis. The results of the MSAT analysis show that, prior to the implementation of exposure reduction measures, the maximum cancer risk on the project site would be 185 in one million and the maximum PM<sub>2.5</sub> concentration would be 7.7 µg/m<sup>3</sup>. As a result, while the maximum PM<sub>2.5</sub> concentration would be below the BAAQMD threshold, the maximum cancer risk would be above the BAAQMD threshold. To reduce the health risk associated with mobile source air toxics, the applicant would incorporate exposure reduction measures as conditions of approval, including vegetation barriers as required by Natomas Crossing EIR Mitigation Measure 4.4-5(b) as well as heating, ventilation, and air conditioning (HVAC) filters, into the project design. With implementation of exposure reduction measures, the cancer risk at the maximally exposed receptor would be reduced to 74 in one million, and the PM<sub>2.5</sub> concentration at the maximally exposed receptor would be reduced to 3.1 µg/m<sup>3</sup>, both of which are below the BAAQMD thresholds. For this reason, the health risk to future onsite residents from mobile source air toxics emissions generated along I-5 and I-80 would remain less than

<sup>12</sup> Bay Area Air Quality Management District (BAAQMD). 2017. *California Environmental Quality Act Air Quality Guidelines, Table 2-1*. Available: [https://www.baaqmd.gov/~/\\_media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~/_media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed March 2020.

significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

In terms of additional mobile source emissions associated with the proposed project, the additional health risk is considered negligible. Additional traffic generated by the residential land-use would be predominantly gasoline-fueled passenger vehicles, which emit a minimal amount of TACs from ROGs. The vast majority of health risk from mobile sources are from DPM emissions associated with diesel-fueled vehicles. For this reason, the health risk to existing off-site sensitive receptors from mobile source air toxics emissions generated by the proposed project would be less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## **Global Climate Change**

A discussion of greenhouse gases (GHG) was included in the Air Quality chapter of the Natomas Crossing EIR. The project analyzed in the Natomas Crossing EIR was designed to minimize emissions of GHGs and thereby reduce the project's contribution to global climate change through consistency with Executive Order S-3-05, the California Global Warming Solutions Act of 2006 (AB 32), and the Attorney General's suggested global warming mitigation measures. The analysis determined that impacts related to GHG emissions would have been less than significant.

The proposed project has the potential to result in emissions of GHGs that would contribute to climate change. To determine whether the proposed project would have a significant impact with regard to GHG emissions, the proposed project was evaluated for consistency with the applicable GHG reduction plans and policies that were in place at the time the Natomas Crossing EIR was certified in 2009.

### ***Greenhouse Gas Emissions***

The Natomas Crossing EIR estimated the GHG emissions that would have resulted from construction and operation of the Natomas Crossing project. The Natomas Crossing EIR estimated that proposed development on Quads B, C and D would have emitted a maximum of 4,529 tons per year CO<sub>2</sub>e during construction and approximately 116,412 tons per year CO<sub>2</sub>e during operation. The largest source of GHGs identified in the Natomas Crossing EIR was on- and off-site motor vehicle use.

To estimate emissions of GHGs that would result from the proposed project, construction and operational emissions were modeled using CalEEMod 2016.3.2. The proposed project is expected to be constructed in two Phases: Phase I which would begin construction in 2020, and Phase II which would begin construction in 2022. Operational GHG emissions were modeled for both Phase I and Phase II of the proposed project. Detailed modeling assumptions can be found in Attachment 1.

Annual construction GHG emissions are presented in **Table 11**. Total construction emissions generated by the proposed project have been amortized over the expected operational (long-term) life of the project as recommended by SMAQMD. The operational life of a building is estimated to be 40 years for new residential developments and 25 years for conventional commercial uses based on State of California Executive Order D-16-00 and the U.S. Green Building Council's October 2003 report on The Costs and Financial Benefits of Green Buildings. The proposed project is a residential development; therefore, construction emissions associated with the proposed project have been amortized over a project life of 40 years, as shown in **Table 12**. Annual total emissions, which include operational emissions in addition to amortized construction emissions, are presented in Table 12.

The proposed project would generate GHG emissions primarily from on-site and off-site mobile source emissions. As shown in Table 12, the proposed project would result in emissions of approximately 4,332.3.2 MT per year CO<sub>2</sub>e.

**TABLE 11  
PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS**

| Construction Year                        | CO <sub>2</sub> e (MT/year) |
|--|-----------------------------|
| <b>Phase I Construction</b>              |                             |
| 2020                                     | 17.4                        |
| 2021                                     | 393.6                       |
| 2022                                     | 198.6                       |
| <b>Phase II Construction</b>             |                             |
| 2022                                     | 44.6                        |
| 2023                                     | 442.5                       |
| 2024                                     | 14.8                        |
| <b>Total Construction GHG Emissions</b>  | <b>1,111.4</b>              |
| <b>Emissions Amortized Over 40 Years</b> | <b>27.8</b>                 |

NOTES:

Project construction emissions were estimated using CalEEMod version 2016.3.2. See Attachment 1 for model outputs and more detailed assumptions.

CO<sub>2</sub>e = carbon dioxide equivalent, MT = metric tons

SOURCE: ESA, 2020.

**TABLE 12**  
**PROJECT OPERATIONAL ANNUAL GREENHOUSE GAS EMISSIONS**

| Source   | CO <sub>2</sub> e (MT/year) |
|--|-----------------------------|
| Area   | 8.1                         |
| Energy   | 931.3                       |
| Mobile   | 3105.2                      |
| Waste  | 178.0                       |
| Water  | 82.0                        |
| Amortized Construction Emissions   | 27.8                        |
| <b>Total Annual Operational GHG Emissions (Operation + Construction)</b> | <b>4,332.3</b>              |

NOTES:  
 Project construction emissions were estimated using CalEEMod version 2016.3.2. See Attachment 1 for model outputs and more detailed assumptions.  
 CO<sub>2</sub>e = carbon dioxide equivalent, MT = metric tons  
 SOURCE: ESA, 2019.

### ***Consistency with Applicable Regulations***

To determine whether the proposed project would have a significant impact in regard to emissions of GHGs, the proposed project was analyzed for consistency with Executive Order S-3-05, the California Global Warming Solutions Act of 2006 (AB 32), and the Attorney General's suggested global warming mitigation measures, discussed below. These are the applicable regulations that were used in the Natomas Crossing EIR.

In 2005, Governor Arnold Schwarzenegger established Executive Order S-3-05, which set forth the following target dates by which statewide GHG emissions would be progressively reduced: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. In 2006, the California legislature passed AB 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq.), also known as the Global Warming Solutions Act. AB 32 codified the 2020 reduction target set forth in S-3-05 and required CARB to design and implement feasible and cost-effective emissions limits, regulations, and other measures, such that statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25-percent reduction in emissions).

The Attorney General's 2008 paper identified approximately 228 strategies and measures to reduce the emissions of individual projects that may contribute to global warming. The Natomas Crossing EIR demonstrated consistency with applicable measures from the Attorney General's 2008 paper through implementation of Mitigation Measure 4.2-6, Mitigation Measure 4.4-1, Mitigation Measure 4.4-3 and through compliance with the Planned Unit Development (PUD) Guidelines Appendix C, *Greenhouse Gas Emissions Measures*. Additionally, the Natomas Crossing EIR stated that the project applicant would have provided information on energy management services to future tenants, and would

have worked with the Sacramento Municipal Utilities District (SMUD) to ensure that renewable energy sources would have been utilized.

The proposed project would be consistent with the Attorney General's 2008 strategies and measures. As discussed above, Natomas Crossing EIR Mitigation Measure 4.4-3 requires that the applicant submit an Air Quality Mitigation Plan to the SMAQMD prior to implementation of the project. Since the publication of the Natomas Crossing EIR, the applicant has developed the North Natomas Regional Retail and Medical Complex Air Quality Mitigation Plan (AQMP), which would be applicable to the proposed project. The proposed project would also be subject to the required GHG emissions measures discussed in the PUD Guidelines Appendix C. Additionally, the project applicant would provide information on energy management services to future tenants, and would work with the Sacramento Municipal Utilities District (SMUD) to ensure that renewable energy sources would be utilized.

To achieve consistency with the measures identified in the Attorney General's 2008 paper, the proposed project would implement Mitigation Measures 4.2-6 and Mitigation Measure 4.4-1(a-b) identified in the Natomas Crossing EIR. While these measures are focused primarily on reduction on nitrogen oxide (NOx) and particulate matter emissions control, they would also have the co-benefit of promoting fuel efficiency and vehicle run times to reduce GHGs. Based on compliance with these measures, the proposed project would be considered consistent with the applicable Attorney General methods to offset or reduce global warming impacts.

In addition, to comply with the measures identified in the Attorney General's 2008 paper, the proposed project would also be compliant with Appendix B of the City's 2030 General Plan, which lists all the policies and programs in the General Plan that address climate change. The proposed project would be consistent with the strategies to reduce GHG emissions because the proposed project would be constructed in an area with pedestrian access via sidewalks and public transportation. The proposed project is conservatively assumed to be designed in compliance with the 2007 Title 24 Building Energy Efficiency Standards, which were the standards in place when the EIR was certified. Since that time, building standards have become more stringent, resulting in more energy-efficient buildings and construction practices.

As discussed above, the proposed project would reduce GHG emissions through consistency with the City's 2030 General Plan and compliance with the measures in the Attorney General's 2008 paper. Therefore, the proposed project would be consistent with the Attorney General's suggested global warming mitigation measures, and would aid in California's goals to reduce GHG emissions under Executive Order S-3-05 and AB 32. The proposed project would not conflict with or obstruct implementation of the goals or strategies of the Attorney General's suggested global warming mitigation measures, Executive Order S-3-05, or AB 32. Compliance with these goals and regulations demonstrates that the impact with respect to GHG emissions would remain less than

significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Conclusion

In summary, the proposed project would not have any significant effects relating to air quality, including greenhouse gas emissions, that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to air quality, including greenhouse gas emissions.

## VI. Transportation and Circulation

The Natomas Crossing EIR included an analysis of impacts to the local transportation system as a result on the Natomas Crossing project. An evaluation of the short-term traffic impacts associated with alternative development scenarios proposed for Quads C and D was recently completed by KD Anderson & Associates in June 2019.<sup>13</sup> The study is provided in **Attachment 3**. The purpose of the evaluation was to determine what portions of Quad C and Quad D may proceed without extending East Commerce Way south to San Juan Road.

Under the alternative scenario for Quad C, the site would be developed with restaurant, retail, office, hotel, and apartment uses. It should be noted that the recent traffic evaluation accounted for the development of 590 apartments, which is 118 more apartments than is proposed under the proposed project. In addition, the evaluation assumed a level of background development in the area consisting of office development on the southern portion of Quad B, office development on the site of the former Sacramento Kings arena, and additional residential development to the east of East Commerce Way below Arena Boulevard.

Trip generation under the alternative scenario for Quad C is provided in **Table 13**. As shown in Table 13, buildout of Quad C would result in a total of 1,272 external trips during the AM peak hours and 1,809 external trips during the PM peak hour. In addition, a comparison of trip generation forecasts for the alternative scenario and the approved development plan for Quad C is provided in **Table 14**. As shown in Table 14, the alternative land use plan would increase overall external trip generation by 181 trips in the AM peak hour and reduce overall external trip generation by 91 trips in the PM peak hour, which equates to a 35 percent increase in trips during the AM peak hour and a 7 percent reduction in trips during the PM peak hour.

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<sup>13</sup> KD Anderson & Associates. 2019. Natomas Crossing Quad C & Quad D Phasing Operational Analysis. June.

**TABLE 13  
TRIP GENERATION FOR QUAD C**

| Description   | Vehicle Trips Generated (Trip-Ends) |              |            |            |              |            |              |
|---|-------------------------------------|--------------|------------|------------|--------------|------------|--------------|
|   | Quantity                            | AM Peak Hour |            |            | PM Peak Hour |            |              |
|   |                                     | Enter        | Exit       | Total      | Enter        | Exit       | Total        |
| <b>Quad C: Arena Boulevard to Amelia Earhart Way</b>        |                                     |              |            |            |              |            |              |
| Fast Food Restaurant (code 934)                             | 2.2 ksf                             | 45           | 43         | 88         | 37           | 35         | 71           |
| Fast Food Restaurant (code 934)                             | 4.5 ksf                             | 92           | 89         | 181        | 76           | 71         | 147          |
| Gas Sales w/ Convenience-Store (code 945)                   | 16 positions                        | 102          | 98         | 200        | 114          | 110        | 224          |
| Auto Parts Sales (code 843)                                 | 6.2 ksf                             | 10           | 8          | 18         | 16           | 17         | 33           |
| High Turnover Sit Down Restaurant (code 932)                | 10.2 ksf                            | 55           | 46         | 101        | 62           | 38         | 100          |
| Subtotal  |                                     | 304          | 284        | 588        | 305          | 271        | 575          |
| Less Internal (10%)   |                                     | 30           | 28         | 58         | 31           | 27         | 58           |
| <b>External Trips</b>                                       |                                     | <b>274</b>   | <b>256</b> | <b>530</b> | <b>274</b>   | <b>244</b> | <b>517</b>   |
| Pass-by Trips   |                                     | 134          | 134        | 268        | 130          | 130        | 260          |
| New External Trips  |                                     | 140          | 122        | 262        | 144          | 114        | 258          |
| <b>Quad C: Amelia Earhart Way to Natomas Crossing Drive</b> |                                     |              |            |            |              |            |              |
| Retail (code 820)   | 142 ksf                             | 82           | 51         | 133        | 338          | 366        | 704          |
| Fitness Center (code 492)                                   | 40 ksf                              | 26           | 26         | 52         | 79           | 59         | 138          |
| Hotel (code 310)  | 150 rooms                           | 42           | 29         | 71         | 44           | 42         | 86           |
| Apartments (code 221)                                       | 320 du                              | 29           | 86         | 115        | 86           | 55         | 141          |
| Apartments (code 221)                                       | 270 du                              | 24           | 73         | 97         | 73           | 46         | 119          |
| <b>External Trips</b>                                       |                                     | <b>203</b>   | <b>265</b> | <b>468</b> | <b>620</b>   | <b>568</b> | <b>1,188</b> |
| Pass-by Trips   |                                     | 28           | 17         | 45         | 120          | 120        | 240          |
| New External Trips  |                                     | 175          | 248        | 423        | 500          | 448        | 948          |
| <b>Total External Trips</b>                                 |                                     | <b>477</b>   | <b>531</b> | <b>998</b> | <b>894</b>   | <b>812</b> | <b>1,706</b> |
| Total Pass By   |                                     | 162          | 151        | 313        | 250          | 250        | 500          |
| Total New External  |                                     | 315          | 380        | 695        | 644          | 562        | 1,206        |

SOURCE: KD Anderson & Associates, Inc., 2019; ITE Trip Generation, Tenth Edition, 2017.

**TABLE 14  
COMPARISON OF TRIP GENERATION FORECASTS FOR QUAD C**

| Description                                  | AM Peak Hour | PM Peak Hour |
|--|--------------|--------------|
|  | Total        | Total        |
| <b>Quad C – Alternative Land Uses</b>        |              |              |
| Total External Trips                         | 998          | 1,706        |
| Total Pass-by                                | 313          | 500          |
| Total New External                           | 695          | 1,206        |
| <b>Approved Quad C</b>                       |              |              |
| Total External Trips                         | 604          | 1,713        |
| Total Pass-by                                | 90           | 416          |
| Total New External                           | 514          | 1,297        |
| <b>Difference</b>                            | <b>181</b>   | <b>-91</b>   |
| SOURCE: KD Anderson & Associates, Inc., 2019 |              |              |

The results of a level of Service (LOS) analysis for nearby intersections is provided in **Table 15**. As indicated in Table 15, conditions at the Arena Blvd/East Commerce Way intersection are projected to remain within the City’s operating standard of LOS D. As shown in Table 15, with the background projects alone, the intersection would operate at LOS D in the AM peak hour and LOS C/D in the PM peak hour (LOS C/D threshold is 35 seconds) with no extension of East Commerce Way south to San Juan Road. The addition of approved Quad C traffic would still result in LOS D during both peak hours, but average intersection delays would be expected to increase substantially in the PM peak hour.

### **Intersections and Roadway Segments**

The Natomas Crossing EIR concluded that traffic generated by the Natomas Crossing project would have exceeded the City’s LOS D standard at the intersection of Arena Boulevard/East Commerce Way under baseline plus project conditions. However, this impact would have been reduced to a less-than-significant level with the implementation of Natomas Crossing EIR Mitigation Measure 4.2-1, which required that southbound, westbound, and eastbound exclusive right turn signal phases be added to the intersection and that funding be provided to the City Traffic Operations Center (TOC) to monitor and retime the traffic signal. All other intersections were anticipated to operate at acceptable LOS levels under the baselines plus project scenario and thus did not require mitigation.

**TABLE 15**  
**INTERSECTION LEVEL OF SERVICE**

| Location                                     | Control | Existing Plus Background Projects |     |                         |     |                         |     |
|--|---------|-----------------------------------|-----|-------------------------|-----|-------------------------|-----|
|  |         | No Development                    |     | Approved Quad C         |     | Alternative Quad C      |     |
|  |         | Average Delay (sec/veh)           | LOS | Average Delay (sec/veh) | LOS | Average Delay (sec/veh) | LOS |
| <b>AM Peak Hour</b>                          |         |                                   |     |                         |     |                         |     |
| Arena Blvd/<br>E. Commerce Way               | Signal  | 39.8                              | D   | 43.5                    | D   | 44.7                    | D   |
| E. Commerce Way/<br>Amelia Earhart           | Signal  | 12.2                              | B   | 16.9                    | B   | 25.7                    | C   |
| E. Commerce Way/<br>New Access               | Signal  | --                                | --  | 4.8                     | A   | 8.8                     | A   |
| E. Commerce Way/<br>Natomas Crossing Drive   | Signal  | 12.3                              | B   | 11.0                    | B   | 11.6                    | B   |
| <b>PM Peak Hour</b>                          |         |                                   |     |                         |     |                         |     |
| Arena Blvd/<br>E. Commerce Way               | Signal  | 35.0                              | C/D | 49.5                    | D   | 48.3                    | D   |
| E. Commerce Way/<br>Amelia Earhart           | Signal  | 16.7                              | B   | 30.8                    | C   | 30.3                    | C   |
| E. Commerce Way/<br>New Access               | Signal  | --                                | --  | 11.9                    | B   | 5.8                     | A   |
| E. Commerce Way/<br>Natomas Crossing Drive   | Signal  | 13.6                              | B   | 18.7                    | B   | 19.6                    | B   |
| SOURCE: KD Anderson & Associates, Inc., 2019 |         |                                   |     |                         |     |                         |     |

As discussed above, traffic generated by both approved development on Quad C and alternative development on Quad C, which includes 118 more apartments the proposed under the proposed project, would not exceed the City's LOS D standard at the intersection of Arena Boulevard/East Commerce Way under existing plus baseline plus project conditions. In addition, operations at additional intersections along East Commerce Way south of Arena Boulevard would also not exceed the City's LOS standard. The improvements at the intersection of Arena Boulevard/East Commerce Way that are required by Natomas Crossing EIR Mitigation Measure 4.2-1 have not been fully implemented. The project applicant would pay a fair-share fee to the City for the proposed project's contribution to these improvements during the plan check for the project. For this reason, the impact of the proposed project at the intersection of Arena Boulevard/East Commerce Way would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

In addition, the Natomas Crossing EIR concluded that the Natomas Crossing project would have had significant effects at various intersections in the project vicinity under

cumulative-plus-project conditions. However, with implementation of Natomas Crossing EIR Mitigation Measures 4.2-18(a) through 4.2-18(h), which would have implemented a range of roadway improvements and fair-share fees, this impact would have been reduced to a less-than-significant level.

The proposed project would have similar cumulative impacts to those analyzed in the Natomas Crossing EIR. As discussed above, the project applicant would pay a fair-share fee to the City for the proposed project's contribution to the improvements referred to in Natomas Crossing EIR Mitigation Measures 4.2-18(a) through 4.2-18(h). Therefore, the cumulative impact of the proposed project at study area intersections would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

### **Freeway Mainline, Ramp Junction, and Ramp Queuing**

The Natomas Crossing EIR analyzed impacts to the freeway mainline, ramp junctions, and ramp queuing from the Natomas Crossing project. Impacts to those facilities were found to be less than significant under baseline plus project conditions, as the traffic volumes added by the Natomas Crossing project would not have exceeded standards of significance. However, with respect to cumulative conditions, the Natomas Crossing EIR found that traffic volumes generated by the Natomas Crossing project would have exceeded Caltrans standards of significance for freeway mainline and freeway ramp junctions. Even with the implementation of Natomas Crossing EIR Mitigation Measures 4.2-20 and 4.2-21, which would have required the payment of development fees to fund all freeway-related improvements, impacts to these facilities would have remained significant and unavoidable; impacts to ramp queuing under cumulative plus project conditions were found to be less than significant with the implementation of Natomas Crossing EIR Mitigation Measure 4.2-22, which would have required the implementation of improvements listed in Natomas Crossing EIR 4.2-18(a).

The proposed project would add similar traffic volumes to the facilities analyzed in the EIR. As described above, relative to approved development on Quad C evaluated in the EIR, the proposed project would generate fewer PM peak hour trips. As demonstrated in the EIR, freeway facilities in the project area function well within their respective capacities, and impacts to those facilities from the proposed project would remain less than significant under baseline plus project conditions. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

Concerning cumulative conditions, the proposed project would pay the required development fees to fund all freeway-related improvements. In addition, the proposed project would pay a fair-share fee to the City for the proposed project's contribution to the improvements referred to in Natomas Crossing EIR Mitigation Measures 4.2-18(a). However, the cumulative impact to freeway mainline and freeway ramp junctions would remain significant and unavoidable. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## **Pedestrian and Bicycle Circulation**

The Natomas Crossing EIR determined that the Natomas Crossing project would have had a potentially significant impact on bicycle and pedestrian facilities as specific information on improvements to these facilities was not available at the time the EIR was prepared. However, this impact would have been mitigated to a less-than-significant level with the implementation of Natomas Crossing EIR Mitigation Measure 4.2-6, which would have required that prior to the issuance of building permits, the project applicant identify all necessary on- and off-site pedestrian and bicycle facilities to serve the proposed development to the satisfaction of the City of Sacramento Traffic Engineering Division.

As required by Natomas Crossing EIR Mitigation Measure 4.2-6, the project applicant has identified improvements to ensure that adequate bicycle and pedestrian access would be provided to the project site. The proposed project would construct sidewalks and a Class II bicycle lane along the western site of East Commerce Way. In addition, the proposed project would provide connection points to the planned Class I bicycle path along the western perimeter of the project site. For these reasons, the impact of the proposed project with respect to pedestrian and bicycle circulation would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## **Transit System**

The Natomas Crossing EIR determined that although particular transit vehicles were operating at or near capacity during the peak commuter periods, a review of existing transit operations and plans for future transit services indicated that there was ample capacity on the Regional Transit system to support the anticipated increase in trips from the Natomas Crossing project. The EIR further concluded that the existing and planned future transit system capacity was sufficient to accommodate the increased project-generated transit ridership. Project applicants would have been required to contribute to the funding of the North Natomas Transit system, as described in the North Natomas Finance Plan, and to join the North Natomas Transportation Management Association (TMA). For these reasons, the impact of the Natomas Crossing project on the existing transit system would have been less than significant.

There are no existing transit facilities in the immediate vicinity of the project site, so construction and operation of the proposed project would not eliminate or alter existing transit facilities or disrupt transit operations. In addition, the project applicant would contribute to the funding of the North Natomas Transit system. For these reasons, impact of the proposed project on the existing transit system would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## **Parking**

The Natomas Crossing EIR determined that impacts related to parking would have been potentially significant as the number of parking spaces that would have been provided as

part of the Natomas Crossing project were unknown at time the EIR was prepared. However, this impact would have been mitigated to a less-than-significant level with the implementation of Natomas Crossing EIR Mitigation Measure 4.2-8, which would have required that parking be provided in accordance with City zoning requirements.

As discussed above, the proposed project would provide up to 857 vehicle parking spaces, which is 149 spaces more than is required by the City's parking code. As a result, impact of the proposed project with respect to parking would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

## Summary

The proposed project would not have any significant effects relating to transportation and circulation that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to transportation and circulation.

## VII. Biological Resources

The project site is currently vacant, undeveloped land that was previously mass-graded in September 2002. A biological survey was conducted prior to grading activities, and the survey did not detect the presence of any special-status species. In addition, prior to grading, the applicant for the Natomas Crossing project paid the required Natomas Basin Habitat Conservation Plan (NBHCP) mitigation fees in September 2002.<sup>14</sup>

Subsequent to the Natomas Crossing EIR, a due diligence assessment report was prepared based on a reconnaissance level biological survey of the project site conducted in 2019. The survey is provided in **Attachment 4**. The project site is a vacant lot that is plowed on a regular basis and appears to have been in agricultural production or vacant and regularly plowed since at least 1907. As a result, the vegetation is characterized by non-native, herbaceous species typical of ruderal, highly disturbed conditions, such as slender oat (*Avena barbata*), ripgut brome (*Bromus diandrus*), dwarf mallow (*Malva neglecta*), milk thistle (*Silybum marianum*), summer mustard (*Hirschfeldia incana*), and prostrate knotweed (*Polygonum aviculare*).<sup>15</sup> The project site lacks trees and sensitive habitats including wetlands or other waters of the U.S. or waters of the state.

The area surrounding the project site is developed and includes I-5, East Commerce Way, commercial and residential developments, and undeveloped vacant lots. Vegetation in

<sup>14</sup> City of Sacramento, 2013. HCP Fees Paid and Grading Permit Status. Available: <http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Natomas/HCP-fees-paid-2013.pdf?la=en>. Accessed March 30, 2020.

<sup>15</sup> WRA 2019. Biological Resources Due Diligence Assessment Natomas II, Sacramento, Sacramento County, California. November 2019.

these developed areas consists primarily of small ornamental trees and irrigated turfgrass along with weedy annual vegetation similar to those identified within the project site.

### Special-status Species

The Initial Study prepared for and appended to the Natomas Crossing EIR noted that the following special-status plants were known to occur within the vicinity of the Natomas Crossing project site: the Delta tule pea (*Lathyrus jepsonii* var. *jepsonii*), Sanford's arrowhead (*Sagittaria sanfordii*), Boggs Lake hedge-hyssop (*Gratiaola heterosepala*), and legenere (*Legenere limosa*). However, all of the plants were riparian or wetland species and would have only occurred within drainage features, vernal pools, and/or marshes. The only drainage feature in the area was a drainage channel located along the western boundary of the Natomas Crossing project site. Development of the channel was not proposed under the Natomas Crossing project. In addition, as the channel is concrete lined, it would not have provided suitable habitat for the special-status plant species listed above. For these reasons, it was concluded that no impact would have occurred with respect to special-status plant species.

The Initial Study prepared for and appended to the Natomas Crossing EIR also noted that the following special-status animal species may use the Natomas Crossing project site for nesting habitat or foraging: tricolored blackbird (*Agelaius tricolor*), Aleutian Canada goose (*Branta Canadensis leucopareia*), white-faced Ibis (*Plegadis chihi*), American peregrine falcon (*Falco Peregrinus anatum*), loggerhead shrike (*Lanius ludovicianus*), greater sandhill crane (*Grus canadensis tabida*), burrowing owl (*Athene cunicularia*), bank swallow (*Riparia riparia*), and Swainson's hawk (*Buteo Swainsoni*). However, with the implementation of Natomas Crossing EIR Mitigation Measure MM-2, which would have required that pre-construction surveys for special-status species be conducted by a qualified biologist 14 days prior to site disturbance, impacts to these special-status animal spaces would have been reduced to a less-than-significant level.

As discussed above, the four special-status plants that are known to occur within the vicinity of the project site require riparian or wetland habitat. Neither of these habitats occur within the project site. The 2019 due diligence assessment report does not identify any special-status plants with the potential to occur within the project site based on existing conditions. Therefore, project-related impacts to special-status plants would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

The Natomas Crossing EIR identified nine special-status animal species with the potential to nest or forage within the Natomas Crossing project site. According to the 2019 due diligence assessment report, none of these species have the potential to occur within the project site based on existing conditions. However, based on a reconnaissance level survey conducted on April 2, 2020, the project site does provide potential foraging habitat for Swainson's hawk (*Buteo swainsoni*) and habitat for burrowing owl (*Athene cunicularia*). The NBHCP identifies grasslands and ruderal habitat maintained by mowing or disking to have low to moderate habitat value for Swainson's hawk and burrowing owls.

and identifies tilling of land as a favorable agricultural practice for foraging Swainson's hawks.<sup>16</sup> Burrowing owls are often found nesting adjacent to or along the perimeter of agricultural and managed fields. In addition, the 2019 due diligence assessment report identified potential burrowing owl nesting habitat on the berm paralleling I-5, which is within 25 feet of the project site. Additionally, while tilling of fields may deter nesting burrowing owls it does not preclude them and depends on the frequency of the disking activity.

The proposed project would be required to implement the avoidance, minimization, and conservation measures to reduce nest disturbance of Swainson's hawk within 0.25 miles of the project site and to reduce take of burrowing owl, in accordance with the NBHCP and Natomas Crossing EIR Mitigation Measure MM-2. As a result, similar to the Natomas Crossing project, potential impacts to Swainson's hawk and burrowing owls would be reduced to a less-than-significant level. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

### **Locally Designated Species and Wetland Habitat**

The Initial Study prepared for and appended to the Natomas Crossing EIR also noted that the Natomas Crossing project would not have resulted in potential impacts to locally designated species (e.g., heritage or City street trees) and wetland habitat (i.e., marsh, riparian and vernal pool). As a result, impacts with respect to locally designated species and wetland habitat were considered to be less than significant.

The existing conditions identified within the 2019 due diligence assessment report align with the conditions on the project site described in the Natomas Crossing EIR regarding the lack of trees, wetlands or waters of the U.S., or regulated sensitive habitats occurring within the project site. The proposed project would not result in the removal of any native or heritage trees nor would it negatively affect natural communities including riparian areas, vernal pools, or wetlands. Therefore, project-related impacts to trees, wetlands or other waters of the U.S., or natural communities would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Summary**

The proposed project would not have any significant effects relating to biological resources that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to biological resources.

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<sup>16</sup> City of Sacramento et al. 2003. Final Natomas Basin Habitat Conservation Plan. Prepared by the City of Sacramento, Sutter County, and the Natomas Basin Conservancy in association with Reclamation District No. 1000 and Natomas Central Mutual Water Company. Prepared for United States Fish and Wildlife Service and California Department of Fish and Game. April.

## VIII. Energy and Mineral Resources

### Energy Supplies

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project would not have required the development of new sources of energy as the Natomas Crossing project site was previously planned for urban development in the 2030 Sacramento General Plan, and the Natomas Crossing project would have generated similar demand for gas and electricity services as anticipated for the site in the 2030 Sacramento General Plan. Therefore, this impact was considered less than significant.

Development of the proposed project would generate a similar demand for gas and electricity supplies as approved development proposed on the southern portion of Quad C. As a result, the proposed project would also not require the development of new sources of energy, and the impact of the proposed project with respect to energy supplies would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### Energy Efficiency

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project would not have used non-renewable resources in a wasteful and inefficient manner as development would have been subject to California's Energy Efficiency Standards (Title 24 of the California Code of Regulations). In addition, development proposed under the Natomas Crossing project would have implemented additional conservation measures, including installation of efficient lighting and lighting control systems, light colored roofs, cool pavements, strategically placed trees, efficient heating, cooling, and appliances. As a result, this impact was considered less than significant.

Development of the proposed project would also adhere to the Title 24 Energy Efficiency Standards that were in place at the time the Natomas Crossing project was approved in 2009, and since strengthened and more restrictive. In addition, the proposed project would implement the same additional conservation measures discussed above. As a result, the proposed project would also not use non-renewable resources in a wasteful and inefficient manner, and the impact of the proposed project with respect to non-renewable resources would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### Summary

The proposed project would not have any significant effects relating to energy and mineral resources that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to energy and mineral resources.

## IX. Hazards and Hazardous Materials

A Phase I Environmental Site Assessment (Phase I) for Quad B, which included Quad C, was prepared in 1996.<sup>17</sup> As summarized in the Initial Study prepared and appended to the Natomas Crossing EIR, the Phase I indicated that residual contamination from the use of pesticides and herbicides on Quad C was a major concern as Quad C was previously used for agricultural production. However, testing did not reveal any detectable or elevated concentrations of pesticides or herbicides. In addition, the field investigation conducted for the Phase I found that approximately 25 cubic yards of soils contaminated by petroleum hydrocarbon existed on the site of a former nursery located on the northern portion of Quad C; these soils were excavated and stockpiled. However, the Phase I determined that the stockpile was removed and properly disposed of in 1996.

Subsequent to this assessment, a Phase I was completed for the project site in 2019.<sup>18</sup> The assessment is provided in **Attachment 5**. The Phase I included an interview with the project owner, a review of past assessments, a search of government regulatory databases, and preliminary screening for vapor encroachment conditions beneath the site. The review of government regulatory database indicated that the project site was not listed on any government databases. However, several nearby parcels associated with the former Natomas Airpark, which operated as an airfield for crop-dusting from 1945 to 1975, were located on government agency databases. In addition, two nearby parcels were located on government agency databases due to the presence of fuel tanks. However, given the documentation reviewed concerning these agency listings, none of the neighboring facilities reviewed is likely to have a negative impact on the project site. Finally, the screening for vapor encroachment conditions found that these conditions do not exist on the project site.

### Accidental Release of Hazardous Substances

The Natomas Crossing EIR concluded that the retail, commercial, and general office uses anticipated on Quads B, C, and D would not have routinely used hazardous materials and dismissed those uses from further discussion relating to hazards or hazardous materials. This impact was considered less than significant.

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

<sup>17</sup> Wallace-Kuhl & Associates, Inc. 1996. Report of Findings, Pacific Central Properties (Property B). December.

<sup>18</sup> Wallace Kuhl & Associates. 2019. Phase I Environmental Site Assessment. Natomas II Property Phase 1, East Commerce Way, Sacramento, California, October 2.

substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Contaminated Soil or Groundwater**

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that the Natomas Crossing project would not have exposed people to existing sources of potential health hazards as testing on Quad C did not reveal any detectable or elevated concentrations of pesticides or herbicides and contamination previously located on the Quad C had been properly removed. This impact was considered less than significant.

Conditions on Quad C have not changed since certification of the 2009 EIR. In addition, as reported in the Phase I prepared for the project site in 2019, the project site is not listed on any government agency databases and none of the nearby parcels which are listed on government agency databases are likely to have a negative impact on the project site. In addition, screening for vapor encroachment conditions on the project site found that these conditions do not exist on the site. As a result, the proposed project would not expose people to existing sources of potential health hazards, and the impact of the proposed project would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Emergency Evacuation Plan**

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that development under the Natomas Crossing project would not have impaired implementation of, or physically interfered with, an emergency response plan or emergency evacuation plan as the Natomas Crossing project site was located within an area planned for urban development. As a result, this impact was considered less than significant.

The proposed project would develop the southern portion of Quad C, similar to anticipated development levels analyzed in the EIR. Development would not require substantial road closures or other elements that may impair the implementation of, or physically interfere with, an emergency response plan or emergency evacuation plan. As a result, impact of the proposed project with respect to interference with an emergency evacuation plan would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Fire Hazards**

The Initial Study prepared for and appended to the Natomas Crossing EIR determined the Natomas Crossing project would not have increased fire hazards in the area as ongoing vegetation management practices, such as disking, would have reduced the likelihood of wildland fires to occur in the area. As a result, this impact was considered less than significant.

Construction activities occurring during the dry season may create sparks that could ignite dry grasses and weeds in the project area or on the project site. However, this risk is

similar to that found at other construction sites and ongoing vegetation management practices would ensure that wildland fires would be unlikely to occur. The proposed project would develop the project site with urbanized uses, similar to anticipated development analyzed in the EIR for Quad C. The proposed project would be subject to similar conditions for which vegetation management practices would remain applicable and effective in minimizing the potential fire hazards from construction. For this reason, the impact of the proposed project with respect to fire hazards would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Summary

The proposed project would not have any significant effects relating to hazards and hazardous materials that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to hazards and hazardous materials.

## X. Noise

### Construction Noise

The Natomas Crossing EIR determined that construction activities within Quad C could have exposed nearby sensitive receptors to temporarily elevated noise levels. However, as construction was proposed to occur within the construction exempt hours, identified in the City of Sacramento municipal code, this impact was considered to be less than significant.

The proposed project would be constructed in two phases; phase I would occur over a period of 24 months while Phase II would follow and occur over a period of 18 months. The nearest existing sensitive receptors are single family homes located approximately 160 feet from the project site boundary across East Commerce Way. However, as units constructed as part of Phase I would be occupied upon completion of construction, the nearest sensitive receptors to construction activities associated with Phase II would be the Phase I receptors that would be located as close as 50 feet from construction activities. Operation of construction equipment such as excavators, graders, tractors, bulldozers, water trucks, cranes, forklifts, generator sets, and welders, would lead to a temporary increase in noise levels at nearby receptors leading to short-term impacts with regard to construction noise. However, the City of Sacramento Noise Ordinance exempts construction activities from the noise standard as long as construction is restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday, and from 9:00 a.m. to 6:00 p.m. on Sundays and provided that all internal combustion engines are equipped with suitable exhaust and intake silencers which are in good working order. In addition, the project applicant would require construction contractors to implement Best Management Practices (BMPs) such as adequate muffling of construction equipment for noise reduction and locating equipment as far as feasible from sensitive receptors. Since construction of the proposed project would

take place within the allowed hours specified in the City's municipal code and use similar construction equipment already anticipated and analyzed in the Natomas Crossing EIR, this impact would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Construction Vibration**

The Natomas Crossing EIR concluded that construction activities proposed within Quad C would not have required the use of equipment known to generate significant vibration levels such as blasting or impact pile driving. As a result, this impact was considered less than significant.

Construction of the proposed project within Quad C would not require the use of construction equipment such as impact pile drivers or blasting. As the site is previously graded, earth moving activities would also be minimal. Vibration generated by the use of equipment required for project construction is not expected to exceed the thresholds for building damage or human annoyance. Therefore, the impact with respect to construction vibration would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Operational Noise – Stationary Sources**

Regional retail and office uses were proposed on Quad C under the Natomas Crossing project. Stationary noise sources associated with these uses included truck circulation and loading docks and rooftop HVAC equipment. The Natomas Crossing EIR found that noise from truck circulation and loading docks at the nearest sensitive receptors would have been less than significant due to predicted noise levels and shielding. In addition, noise from rooftop HVAC equipment on buildings in Quad C was also found not to exceed the City's exterior noise threshold resulting in a less than significant impact.

The proposed project would deviate from the land uses proposed for the project site under the Natomas Crossing project by eliminating regional retail and office uses and replacing them with multi-family residential uses. Therefore, the proposed project would not generate any noise from truck circulation and loading docks typically with retail and commercial buildings. HVAC equipment associated with the residential buildings would be installed on the rooftops of the buildings. Section 8.68.110 of the City of Sacramento Municipal Code requires that all residential pumps, fans, and air conditioning equipment be designed and operated in a way that maximum noise level at the exterior area of an adjacent residential use be limited to less than 55 dBA. HVAC equipment for the project would be designed to meet this standard. For these reasons, this impact would be lower than the impact analyzed in the Natomas Crossings EIR and would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Operational Noise – Traffic Sources

The Natomas Crossing EIR evaluated the potential for the Natomas Crossing project to result in an increase in vehicular traffic noise along roadways in the vicinity of the Natomas Crossing project site. As shown in Table 4.3-9 of the Natomas Crossing EIR, traffic noise was modeled for the Baseline No Development and Baseline plus Project Conditions, which accounted for traffic that would have been generated by development proposed for Quads B, C and D. The Natomas Crossing EIR concluded that existing off-site sensitive receptors would not have been exposed to vehicular traffic noise that would have exceeded the exterior noise standards established in the City of Sacramento General Plan, and this impact was considered less than significant.

Using algorithms from the Federal Highway Administration's (FHWA) *Traffic Noise Model Technical Manual* and the estimated traffic volumes for Existing plus Background and Existing plus Background plus Project (Quad C Alternative) conditions, traffic noise levels were estimated for segments of Arena Boulevard and East Commerce Way. This analysis follows an approach consistent with the analysis of traffic noise in the Natomas Crossings EIR and compares traffic noise levels, as predicted using the FHWA model to the City's 65 dBA exterior noise standard. Existing residential uses are primarily located along East Commerce Way to the east. As shown in **Table 16**, with the addition of project traffic, noise levels at the facades of these buildings along East Commerce Way vary from 60 to 69 dBA. The City's exterior noise standard applies to common outdoor areas at residential uses which are located on the side of the building not facing the roadway. Therefore, the buildings themselves would provide an attenuation of 10 to 15 dBA reducing the noise levels in exterior common areas to less than 65 dBA, which is both the City's exterior noise standard and the appropriate threshold for multifamily residential uses identified in the City of Sacramento General Plan Policy EC 3.1.1. Therefore, the impact to existing off-site sensitive receptors from traffic noise generated by the proposed project would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Existing Noise – Future Residents

Residential uses were only proposed for the northern portion of Quad B under the Natomas Crossing project. The Natomas Crossing EIR stated that because a site plan had not yet been submitted for the residential development, the EIR could not conclusively determine if noise levels in the proposed residential portion of Quad B would have exceeded applicable City noise level thresholds and the impact was conservatively concluded to be potentially significant. However, with the implementation of Natomas Crossing EIR Mitigation Measure 4.3-6, which would have required the applicant to retain a qualified acoustical consultant once a site plan had been prepared to analyze the impact of existing noise on future residents on Quad B, and provide recommendations to reduce noise levels if existing noise was found to be above the City's applicable noise standards, this impact was considered less than significant.

**TABLE 16**  
**EXISTING AND PROJECTED L<sub>DN</sub> TRAFFIC NOISE LEVELS**  
**FROM A DISTANCE OF 50 FEET FROM CENTER OF ROADWAY**

| Roadway Segment  | Traffic Noise Level, dBA, L <sub>dn</sub> <sup>a</sup> |   |                            |
|--|--|---|----------------------------|
|  | Existing plus Background (A)                           | Existing plus Background Project Quad C Alternative (B) | Incremental Increase (B-A) |
| Arena Boulevard, west of intersection with North Access Road     | 75   | 75  | +<1                        |
| Arena Boulevard, from North Access to Commerce Way               | 75   | 75  | +<1                        |
| Arena Boulevard, east of intersection with Commerce Way          | 74   | 74  | +<1                        |
| E Commerce Way, from Arena Boulevard to Northeast Access         | 63   | 69  | +6                         |
| E Commerce Way, from Northeast Access to Amelia Earhart Avenue   | 63   | 68  | +5                         |
| E Commerce Way, from Amelia Earhart Avenue to Southeast Access   | 62   | 64  | +2                         |
| E Commerce Way, from Southeast Access to Natomas Crossings Drive | 62   | 63  | +1                         |
| E Commerce Way, south of Natomas Crossings Drive                 | 58   | 60  | +2                         |

## NOTES:

a Noise levels were determined using methodology described in FHWA Traffic Noise Model Technical Manual using estimated traffic volumes.

SOURCE: K. D. Anderson & Associates, 2019; ESA, 2020

While Natomas Crossing EIR Mitigation Measure 4.3-6 only applied to Quad B, the applicant for the proposed project did prepare a site-specific noise study<sup>19</sup> to analyze the noise compatibility of the proposed project with City noise standards. The study is provided in **Attachment 6**. The dominate source of noise on the project site is noise generated by traffic along I-5. An additional source of noise on the project site is noise generated by traffic along East Commerce Way. A 24-hour noise measurement was conducted approximately 225 feet from I-5 centerline to characterize the existing noise environment at the site. According to the measurement, the existing noise level on the project site was 71.5 dBA L<sub>dn</sub>.

As shown in **Table 17**, the predicted future traffic noise levels at project buildings 2, 4, 5, and 7 would be above 65 dBA L<sub>dn</sub>, which is the City of Sacramento's exterior noise level standard for multi-family residential uses. However, the predicted future traffic noise levels noise at project buildings 1, 3, and 5, the project's outdoor areas, and locations on the project site 100 feet from East Commerce Boulevard would be below the City's standard.

<sup>19</sup> J. C. Brennan & Associates. 2019. Natomas II Multi-Family Residential Environmental Noise Analysis. October 23, 2019.

**TABLE 17**  
**PREDICTED FUTURE NOISE LEVELS AT PROJECT EXTERIOR AREAS<sup>a</sup>**

| Location                      | Distance <sup>b</sup>              | Predicted L <sub>dn</sub> (dBA) <sup>c</sup> |
|-------------------------------|------------------------------------|--|
| Project Buildings 2, 4, 5 & 7 | 334 feet from I-5                  | 71   |
| Project Buildings 1,3, & 6    | 554 feet from I-5                  | 63 <sup>d</sup>                              |
| Outdoor Areas                 | 554 feet from I-5                  | 63 <sup>d</sup>                              |
| E Commerce Boulevard          | 100 feet from E Commerce Boulevard | 63   |

## NOTES:

- a Future noise levels predicted using Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA RD-77-108). The model is based upon the CALVENO noise emission factors for automobiles, medium trucks and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site.
- b Distances are measured from the roadway centerline.
- c Includes an adjustment factor of -3 dBA to noise levels predicted by the FHWA model to account for site specific attenuating characteristics. The adjustment factor was calculated by comparing a short-term measurement conducted at the project site to modeled existing traffic noise level based traffic counts on I-5 conducted concurrently with the noise measurement. Monitored existing noise level was found to be lower than the FHWA modeled noise level by approximately 3 to 4 dBA due to the fact that I-5 adjacent to the site is elevated and shields noise from the southbound I-5 traffic lanes.
- d Includes 5 dBA attenuation from the first row of buildings in addition to attenuation due to distance.

SOURCE: J.C. Brennan & Associates, 2019.

Standard construction practices, consistent with the uniform building code typically provide an exterior-to-interior noise level reduction of approximately 20 to 25 dBA, assuming that air conditioning is included for each unit, which allows residents to close windows for the required acoustical isolation.

As shown in Table 17, exterior traffic noise levels are predicted to be 71 dBA L<sub>dn</sub> at first floor facades of Buildings 2, 4, 5 & 7. Upper floors will be exposed to exterior noise levels of approximately 74 dBA L<sub>dn</sub> (3 dBA higher) due to the lack of excess ground absorption. Similarly, upper floor facades of Buildings 1,3, & 6 will be exposed to exterior noise levels of approximately 66 dBA L<sub>dn</sub>. In order to ensure interior noise levels of 45 dBA L<sub>dn</sub>, consistent with Mitigation Measure 4.3-6 in the Natomas Crossing EIR, the following measures are recommended and would be included as conditions of approval:

In order to comply with the City of Sacramento interior noise level standard of 45 dBA L<sub>dn</sub>,

- the first floor facades of Buildings 2, 4, 5 & 7 shall require STC 30 rated windows and sliding glass doors on the facades parallel and perpendicular to I-5. Facades opposite of I-5 will not require specific STC ratings; and
- the upper floor facades of Buildings 2, 4, 5 & 7 will require STC 33 rated windows and sliding glass doors on the parallel and perpendicular facades. Facades opposite of I-5 will not require specific STC ratings.

With these conditions of approval, interior noise levels would be reduced to 45 dBA, L<sub>dn</sub>, and the impact would remain less than significant. Thus, no new or substantially more

severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## **Summary**

In summary, the proposed project would not have any significant effects relating to noise that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to noise.

## **XI. Public Services**

### **Police and Fire Protection Services**

Police protection services to the project site are provided by the Sacramento City Police Department (SPD). The project area is serviced by the William J. Kinney Police Facility, operating at 3550 Marysville Boulevard, approximately 5.5 miles east-southeast of the project site. Fire protection and emergency medical services to the project area are provided by the Sacramento Fire Department (SFD). The nearest fire station to the project site is Station 43, located at 4201 El Centro Road, approximately 1 mile northwest of the project site.

Natomas Crossing EIR noted that the intensity of development on the Natomas Crossing project site under the Natomas Crossing project was similar to the intensity of development on the Natomas Crossing project site proposed in the 2030 General Plan, which concluded that upon implementation of the various police- and fire-related goals and policies included in the general plan, a less-than-significant impact would have resulted from general plan buildout. As the Natomas Crossing project would have complied with applicable police- and fire-related goals and policies in the 2030 Sacramento General Plan, including the payment of applicable development fees, the Natomas Crossing EIR concluded that the project would have had a less-than-significant impact with respect to police and fire protection services.

The proposed project would also pay applicable development fees that were in place at the time the Natomas Crossing project was approved in 2009, and thus would comply with police- and fire-related goals and policies in the 2030 Sacramento General Plan. Therefore, the impact on police and fire protection services under the proposed project would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Schools**

The project site is located within the boundaries of the Natomas Unified School District (NUSD). Any school-age children living on the project site could attend schools located within the NUSD's boundaries.

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project would not have had an effect upon or resulted in the need for new school services as proposed development would have been required to pay school impact fees pursuant to SB 50 and AB 1600, the payment of which was considered full mitigation for school facilities. As a result, this impact was considered less than significant.

The project applicant would also be required to pay school impact fees pursuant to SB 50 and AB 1600 that were in place at the time the Natomas Crossing project was approved in 2009. As a result, the proposed project would also not have an effect upon or result in the need for new school services, and the impact of the proposed project with respect to school services would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Public Facilities**

Public Facilities in the vicinity of the project site include public roadways and parks. Public roadways in the City of Sacramento are owned and maintained by the Department of Public Works while parks in the City are owned and maintained by the Department of Youth, Parks, & Community Enrichment. The nearest major public roadways in the vicinity of the project site are East Commerce Way, located adjacent to the project site, and Arena Boulevard, located approximately 0.25 miles to the north of the project site. The closest park to the project site is Linden Park, a 4.9-acre neighborhood park located approximately 0.5 miles to the northeast of the project site.

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project would not have had an effect upon public facilities, such as parks and roads, as the project would have been required to provide sufficient parklands or pay in-lieu fees in accordance with City of Sacramento standards, and would have paid development fees and applicable taxes toward the maintenance of roads in the vicinity of the project site. As a result, this impact was considered less than significant.

The project applicant would also pay in-lieu park fees and development fees that were in place at the time the Natomas Crossing project was approved in 2009. In addition, the project applicant would also pay applicable property taxes. For these reasons, the proposed project would also not have an effect upon public facilities, such as parks and facilities, and the impact of the proposed project with respect to public facilities would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Summary**

In summary, the proposed project would not have any significant effects relating to public services that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR

remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to public services.

## XII. Utilities

### Communication Systems

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that the Natomas Crossing project would have had a less-than-significant impact on communication systems as no communication system components (e.g., microwave, radar, radio transmissions) were located on or adjacent to the Natomas Crossing project site. In addition, the heights of structures that would have been developed under the Natomas Crossing project were not sufficient enough to interfere with communications equipment in the greater vicinity.

No communication systems have been installed on or adjacent to the project site since certification of the 2009 EIR. Structures proposed under the Natomas Crossing project ranged in height from one to five stories and the apartment buildings to be constructed under the proposed project would each be four stories in height. As a result, similar to the Natomas Crossing project, the proposed project would not construct buildings of sufficient height to interfere with communication equipment in the greater vicinity. For these reasons, the impact of the proposed project on communication systems would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### Water Supply and Conveyance

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that the Natomas Crossing project would have had a less-than-significant impact related to water supply. The analysis of water supply in the Initial Study was based on the City's 2006 Urban Water Management Plan (UWMP), which indicated that the City would have had adequate water supply to serve the total anticipated demand associated with City buildout, even in multiple dry year scenarios out to 2030. The Natomas Crossing project area was anticipated to have a demand of approximately 420.4 acre-feet per year based on existing zoning at the time the EIR was prepared. The project site was comprised of approximately 14.2 acres of land under the EC-40-PUD zoning designation and about 2.3 acres of land under the EC-50-PUD zoning designation. Both zoning designations were analyzed as having a demand factor of 3.00 acre-feet per acre per year, generating a total water demand of approximately 49.5 acre-feet per year (see **Table 18**).

The proposed project would have a water demand of 70.8 acre-feet per year (see **Table 19**). This amount is greater than the amount of water demanded for the project site as described in the Natomas Crossing EIR.

**TABLE 18**  
**PROJECT SITE WATER DEMAND UNDER EXISTING ZONING SCENARIO**  
**BASED ON 2006 UWMP ASSUMPTIONS**

| Existing Zoning Designation in EIR | Acres | 2006 UWMP Water Demand Factors (ac-ft/ac-yr) | Demand      |
|------------------------------------|-------|--|-------------|
| EC-40-PUD                          | 14.2  | 3.00   | 42.6        |
| EC-50-PUD                          | 2.3   | 3.00   | 6.9         |
| <b>Total</b>                       |       |  | <b>49.5</b> |

SOURCE: City of Sacramento, 2009; ESA, 2018.

**TABLE 19**  
**WATER DEMAND**

| Land Use Type       | # of Units | Water Demand Factor    | Demand (AFY) |
|---------------------|------------|------------------------|--------------|
| Regional Commercial | 472        | 0.15 AFY/dwelling unit | 70.8         |

SOURCE: City of Sacramento Department of Public Works, 2018. *Water Study Design Manual*.

Subsequent to preparation of the Natomas Crossing EIR, the City's UWMP has been updated twice. The most recent UWMP was adopted in 2016 (the 2015 UWMP), and includes an analysis of water demand sufficiency under normal, single dry year, and multiple dry year scenarios.<sup>20</sup> Water supply and demand projections include future planned development until 2040. 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 2040.

The projected water demand from the proposed project was accounted for in the City's 2015 UWMP, as the land use projections used in the 2015 UWMP were based on existing General Plan land use designations, and the proposed project is consistent with the RC General Plan land use designation for the project site. As a result, the impact of the proposed project with respect to water supply would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Wastewater Facilities

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that impacts from the Natomas Crossing project to wastewater facilities would have been less than significant. The analysis in the Initial Study was based on a Revised Master

<sup>20</sup> City of Sacramento, 2016. 2015 Urban Water Management Plan. Adopted June 2016.

Sewer Study for Natomas Crossing Area 3, prepared in May 2002. The Master Sewer Study indicated that Quad C was comprised of three shed areas. Each of the three shed areas had an existing eight-inch line sized for connection to the 54-inch trunk sewer in East Commerce Way. The estimated combined design flow for the three shed areas was 0.22 MGD; equivalent to the estimated design flow for the proposed land uses for Quad C under the Natomas Crossing project. The estimated cumulative design flows for Quads B, C, and D would have been less than the design capacity of an eight-inch sewer line at minimum design grades, from which the Initial Study concluded that impacts to wastewater facilities would have been considered less than significant.

**Table 20** compares anticipated wastewater generation between the proposed development on Quad C and anticipated development on Quad C under the Natomas Crossing project.

**TABLE 20**  
**COMPARISON OF QUAD C AVERAGE WASTEWATER FLOW**

| Project                              | Land Use Category        | Applicable Units                 | ESD <sup>1</sup> Conversion Factor  | Total Equivalent ESD | Estimated Gallons per Day (GPD) |
|--------------------------------------|--------------------------|----------------------------------|-------------------------------------|----------------------|---------------------------------|
| <b>Natomas Crossing EIR Project</b>  | Office                   | 200,000 sf<br>(gross floor area) | 0.5/1,000 sf<br>(gross floor area)  | 100                  | 40,000                          |
|                                      | Retail                   | 404,580 sf<br>(gross floor area) | 0.25/1,000 sf<br>(gross floor area) | 101.15               | 40,460                          |
| <b>Total</b>                         |                          |                                  |                                     | <b>201.15</b>        | <b>80,460 GPD</b>               |
| <b>Natomas II Apartments Project</b> | Residential <sup>2</sup> | 472 Dwelling Units               | 0.75/Dwelling Unit                  | 354                  | 141,600                         |
| <b>Remaining Quad C Development</b>  | Retail                   | 404,580 sf<br>(gross floor area) | 0.25/1,000 sf<br>(gross floor area) | 101.15               | 40,460                          |
| <b>Total</b>                         |                          |                                  |                                     | <b>455.15</b>        | <b>182,060</b>                  |
| <b>Difference</b>                    |                          |                                  |                                     | <b>+254</b>          | <b>+100,600 GPD</b>             |
| <b>Percent Difference</b>            |                          |                                  |                                     | <b>+125%</b>         | <b>+125%</b>                    |

NOTES:

- 1 ESD: Equivalent Single Family Dwelling Units, used for computing average flow (1 ESD = 400 gallons/day)
- 2 This analysis assumes that the proposed residential uses would replace the approved office uses.

SOURCE: City of Sacramento Department of Utilities, 2018; ESA, 2018.

As shown in Table 20, relative to the anticipated mix of office and retail development on Quad C analyzed in the Initial Study, wastewater flows from the proposed residential development would be increased by approximately 125 percent. However, anticipated flows would not exceed capacity of conveyance infrastructure. Required developer financing of fees and infrastructure to provide wastewater collection and treatment to the project site by the SRCSD and County Sanitation District #1 would ensure that

wastewater infrastructure would be adequate meet project demand. For these reasons, the proposed project would not substantially increase demand for wastewater conveyance beyond the amount anticipated in the Master Sewer Study or require substantial offsite improvements that would constitute new or more significant impacts. As a result, the impact of the proposed project with respect to wastewater would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Storm Water Drainage**

Drainage facilities for Area 3 of the Natomas Crossing PUD were master planned in 2002 and sized assuming a mixture of commercial and employment land uses, which would have covered 90 percent of the Natomas Crossing project site with impervious surfaces. The Natomas Crossing EIR determined that the existing drainage facilities in the area would have had sufficient capacity to serve the Natomas Crossing project as the project would not have included a greater percentage of impervious surfaces than the 90 percent impervious assumption used in the Master Drainage Study. Therefore, this impact was considered less than significant.

As described above, approximately 78 percent of the project site would be covered with impervious surfaces, which is less than the 90 percent impervious assumption for the site assumed in the Master Drainage study. As a result, adequate off-site drainage capacity exists to serve the proposed project, and this impact would remain less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

### **Solid Waste Disposal**

The City provides solid waste and recycling collection and disposal services to the project area. In 2009, solid waste generated in the City of Sacramento was primarily disposed of at the Kiefer Landfill, located in eastern Sacramento County, and the Lockwood Landfill, located in Sparks, Nevada.

The Initial Study prepared for and appended to the Natomas Crossing EIR determined the solid waste generated by the Natomas Crossing project would have represented a tiny fraction of the amount of solid waste received by the Kiefer and Lockwood landfills in a single day, and would not have created a measurable effect on the capacities of the landfills. Furthermore, the Natomas Crossing project would have complied with all federal, State, and local statutes and regulations related to solid waste reduction. Therefore, this impact was considered less than significant.

Solid waste in the City of Sacramento is no longer transported to the Lockwood landfill; the Kiefer Landfill is the primary location for the disposal of waste in the City of Sacramento. Waste generated by the proposed project would be collected and transported to local transfer station by the City and/or private haulers, and either recycled in accordance with City programs and requirements or land filled at Kiefer Landfill. As of

2012, 305 acres of the 660 acres at the landfill contained waste.<sup>21</sup> The landfill facility sits on 1,084 acres. As a result, the Kiefer Landfill is expected to be able to provide service to the City, without need for new expansion beyond that already planned, until the year 2065.<sup>22</sup> Because there would be no need to expand or create new landfill or solid waste management facilities, there would be no related physical environmental effects. Similar to the impacts evaluated in the Initial Study, the proposed project would have a less than significant effect on solid waste disposal. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Summary

The proposed project would not have any significant effects relating to utilities that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to utilities.

## XIII. Aesthetics, Light, and Glare

### Visual Character

The Natomas Crossing EIR noted that the plans for Quad C were program-level and did not provide information for a detailed analysis of potential visual impacts. Future development of Quad C would have required the applicant to submit detailed plans for Planning Director Plan Reviews, as well as approval of Tentative Maps. The Natomas Crossing EIR determined that the Planning Director Plan Review process would have resulted in compliance with the Natomas Crossing PUD Development Guidelines and the North Natomas Community Plan Development Guidelines, which would have ensured that the architecture and landscaping of specific uses would not have adversely affected adjacent uses. As a result, the EIR concluded that the Natomas Crossing project would be expected to have less-than-significant impacts related to altering the visual character or quality of the Natomas Crossing project site.

Since certification of the of the Natomas Crossing EIR, the project site and surrounding uses have remained similar to those analyzed in the EIR. The project site remains vacant, and surrounding uses include residential uses to the east; I-5 to the west; and vacant parcels to the north and south.

As with the project analyzed in the Natomas Crossing EIR, the proposed project would be subject to City site plan and design review to ensure that proposed project complies with applicable design guidelines and is compatible with surrounding uses. As a result, the impact of the proposed project with respect to visual character would remain less than

<sup>21</sup> City of Sacramento, 2014. City of Sacramento 2035 General Plan Background Report Public Review Draft. August 2014. p. 4-45.

<sup>22</sup> City of Sacramento, 2014. City of Sacramento 2035 General Plan Background Report Public Review Draft. August 2014. p. 4-45.

significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## **Light and Glare**

In the analysis of light and glare impacts, the Natomas Crossing EIR noted that the Natomas Crossing project site consisted predominantly of vacant land, and therefore little light or glare was emitted from the site. The EIR stated that the change from an undeveloped property to a mixture of commercial, office, hotel, medical, and residential uses would have generated new sources of light and glare such as parking lots, building lighting, and streetlights. The Natomas Crossing EIR noted that the types of lighting and specific locations were not specified, and that required Planning Director Plan Review would have ensured that future development of Quad C would have been in conformance with the Natomas Crossing PUD Development Guidelines, the North Natomas Community Plan Development Guidelines, and the Natomas Crossing Design Guidelines, which would have ensured that adverse light and glare impacts would not have occurred as a result of the Natomas Crossing project. As a result, the EIR concluded that the proposed project would be expected to have less-than-significant impacts related light and glare.

As with the project analyzed in the Natomas Crossing EIR, the proposed project would be subject to City site plan and design review to ensure that adverse light and glare impacts would not occur as a result of the project. As a result, the impact of the proposed project with respect to light and glare would be less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## **Summary**

The proposed project would not have any significant effects relating to aesthetics that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impact related to aesthetics.

## **XIV. Cultural Resources**

The project site is currently vacant, undeveloped land that has been graded and has been previously used for agricultural activities. The project site is located adjacent to urbanized areas and I-5. The soils have been disturbed as a result of agricultural use and relatively recent grading of the project site.

ESA conducted background research at the North Central Information Center (NCIC) of the California Historical Resources Information System at Sacramento State University on February 24, 2020 (File No. SAC-20-19). The background research was supplemented by additional research previously conducted for other projects in the general vicinity. PAR

archaeologists conducted an intensive cultural resources survey in March 1997.<sup>23</sup> An ESA archaeologist conducted a cursory cultural resources survey on March 16, 2020. The project site was covered in dense vegetation due to the recent rains, which was periodically scraped back so exposed areas could be inspected closely for cultural materials.

The project site is within the Rural Historic Landscape Reclamation District 1000 (RD 1000), which is composed of farm parcels and infrastructure (roads, canals, irrigation ditches, and similar structures) built by the Natomas Company between 1911 and 1955 and then sold to private owners,<sup>24,25</sup> but no cultural resources associated with the RD 1000, or contributing to this historic landscape, are located within the project site.

### **Unknown Archaeological Resources and Human Remains**

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that construction of the Natomas Crossing project could have resulted in the disruption of undiscovered archaeological resources and human remains on the Natomas Crossing project site. However, with the implementation of Natomas Crossing EIR Mitigation Measure MM-3, which would have required that a qualified archeologist be consulted in the event that unknown archaeological resources are discovered, Natomas Crossing EIR Mitigation Measure MM-4, which have required that appropriate Native American representatives be consulted in the event a Native American site is discovered, and Natomas Crossing EIR Mitigation Measure MM-5, which would have required that the County Coroner be notified if a human bone or bone of unknown origin is found during construction, impacts with respect to undiscovered archaeological resources and human remains would have been reduced to a less-than-significant level.

Based on previous research on the Natomas Crossing project site and background research and survey efforts conducted for the proposed project, no cultural resources have been identified within the project site or in the immediate vicinity. In addition, RD 1000 would not be impacted by any project activities. However, the potential still remains that undiscovered archaeological resources and human remains may be located on the project site. However, similar to the Natomas Crossing project, with implementation Natomas Crossing EIR Mitigation Measures MM-3, MM-4 and MM-5, this impact would be reduced to a less-than-significant level. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No new mitigation would be required.

<sup>23</sup> PAR Environmental Services, 1997. Cultural Resources Inventory and Evaluation. March.

<sup>24</sup> Bradley, Denise, and Michael Corbett, 1996. Final Rural Historic Landscape Report for Reclamation District 1000 for the Cultural Resources Inventory and Evaluations for the American River Watershed Investigation, Sacramento and Sutter Counties, California. Report #3469 on file, California Historic Resource Information System, North Central Information Center, California State University, Sacramento.

<sup>25</sup> California Department of Transportation, 2001. Historic Property Survey Report and Finding of Effect for the Proposed Stadium Interchange and Auxiliary Lanes on Interstate 5 Between Interstate 80 and Del Paso Road in Sacramento, Sacramento County, California. On file, California Historic Resource Information System, North Central Information Center, California State University, Sacramento.

## Existing Religious or Sacred Uses

The Initial Study prepared for and appended to the Natomas Crossing EIR determined that the Natomas Crossing project would not have restricted existing religious or sacred uses within the potential impact area as the Natomas Crossing project site had been massed graded and religious or sacred uses were not associated with the site. As a result, the impact with respect to restricting existing religious or sacred uses on the Natomas Crossing project site was considered less than significant.

Conditions on Quad C have not changed since certification of the 2009 EIR. As a result, the proposed project would not restrict existing religious or sacred uses on the project site, and the impact of the proposed project with respect to the restriction of existing religious or sacred uses on the project site would be less than significant. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

## Summary

In summary, the proposed project would not have any significant effects relating to cultural resources that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impacts related to cultural resources.

## XV. Recreation

The Initial Study prepared for and appended to the Natomas Crossing EIR found that the Natomas Crossing project would not have had an adverse effect on the quality or quantity of recreational facilities as the project would have been required to provide sufficient parklands or pay in-lieu fees in accordance with City of Sacramento standards. As a result, this impact was considered less than significant.

The project applicant would also pay in-lieu park fees and development fees that were in place at the time the Natomas Crossing project was approved in 2009. For this reason, the proposed project would also not have an adverse effect on the quality or quantity of recreational facilities. Thus, no new or substantially more severe impacts would occur than analyzed in the 2009 EIR. No mitigation would be required.

In summary, the proposed project would not have any significant effects relating to recreation that either have not already been analyzed in a prior EIR, or that are substantially more significant than previously analyzed. The conclusions of the Natomas Crossing EIR remain valid, and approval of the proposed project would not result in new or substantially more severe significant impacts related to recreation.

## Conclusion

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

any substantial changes occurred with respect to the circumstances under which the Natomas Crossing project is undertaken, that would require major revisions to the original Natomas Crossing EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The proposed project would not include any substantial new information, changes, or impacts that would require major revisions to the Natomas Crossing EIR and no new mitigation measures would be required.

In addition, there is no new information of substantial importance showing that the project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the previous EIR. Nor is there new information of substantial importance showing (i) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative.

Having considered the analysis set forth in this Addendum, the City of Sacramento's Community Development Department has concluded that the analyses conducted, and the conclusions reached in the Natomas Crossing EIR remain relevant and valid. Based on the record and pursuant to CEQA Guidelines §15162-15163, the City determines, based on substantial evidence, that no new information of substantial importance, or changes to the project or surrounding circumstances will require major revisions to the previous EIR due either to a new significant effect or a substantial increase in the severity of a previously identified significant effect on the environment.

Thus, a subsequent EIR is not required for the changes to the project. The proposed project would remain subject to all applicable previously required mitigation measures from the EIR.

Based on the above analysis, this Addendum to the previously certified EIR for the project has been prepared.

**Attachments:**

- 1) Air Quality Emissions Calculations & Health Risk Assessment
- 2) Mobile Source Air Toxics Analysis
- 3) Transportation Analysis
- 4) Biological Resources Assessment
- 5) Phase I Environmental Site Assessment
- 6) Environmental Noise Analysis