

City of SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

ENVIRONMENTAL PLANNING
SERVICES

300 Richards Boulevard
Third Floor
Sacramento, CA 95811

MITIGATED NEGATIVE DECLARATION

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

Sacramento Senior Living Project (P15-041) - The project is located at 500 Leisure Lane, Sacramento, California (APN 275-0260-068), which is south of Highway 160 and east and north of Expo Parkway. The project proposes the subdivision of an 18 acres parcel into two parcels and the construction of a multi-story, 99,487 square foot residential care facility housing assisted living residents and memory care residents on approximately 3.76 acres, along with sidewalk improvements bordering the project site. The multi-story building will cover approximately 0.96 acre of the project site, and approximately 1.50 acres of the site will be landscaped; the remaining areas of the site will either be asphalt concrete on aggregate base (such as the parking areas), hardscape, or concrete paved areas.

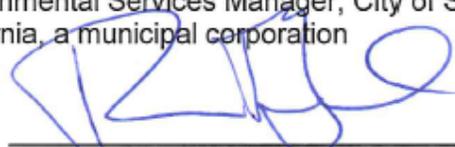
Specific project elements include 113 patient suites (~~79~~ ~~88~~ suites for assisted living residents, ~~34~~ ~~25~~ suites for memory care residents), craft/activity room, exercise therapy room, café, commercial kitchen, dining rooms, library, computer stations, theatre, card room, lounge, laundry and approximately 65 surface parking spaces. The proposed project would require a conditional use permit and development standards deviation due to the existence of an existing private sewer easement located in the southern portion of the property.

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

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

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

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

By: _____


Date: _____
May 4, 2014

SACRAMENTO SENIOR LIVING [P15-041]

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR ANTICIPATED SUBSEQUENT PROJECTS UNDER THE 2035 GENERAL PLAN MASTER EIR

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

ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into the following sections:

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

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

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION: Reviews proposed project and states whether the project would have additional significant environmental effects (project-specific effects) that were not evaluated in the Master EIR for the 2035 General Plan.

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

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

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

SECTION I - BACKGROUND

Project Name and File Number: Sacramento Senior Living (P15-041)

Project Location: 500 Leisure Lane (APN 275-0260-068)

Project Applicant: Mr. Greg Elmore
3150 Kettle Ct SE
Salem, OR 97301

Project Planner: David Hung

Environmental Planner: Scott Johnson

Environmental Consultant: HELIX Environmental Planning, Inc.

Date Initial Study Completed: March 2016

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

The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan Master Environmental Impact Report (MEIR) and is consistent with the land use designation and the permissible densities and intensities of use for the project site as set forth in the 2035 General Plan. See CEQA Guidelines Section 15176 (b) and (d).

The City has prepared the attached Initial Study to: (a) review the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the 2035 General Plan MEIR to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)); and, (b) identify any potential new or additional project-specific significant environmental effects that were not analyzed in the Master EIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects to a level of insignificance, if any.

As part of the MEIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the MEIR (CEQA Guidelines Section 15177(d)). The MEIR mitigation measures that are identified as appropriate are set forth in the applicable technical sections below. Policies included in the 2035 General Plan that reduce significant impacts identified in the MEIR are identified and discussed in the MEIR.

This analysis incorporates by reference the general discussion portions of the 2035 General Plan Update MEIR (CEQA Guidelines Section 15150(a)). The MEIR is available for public review at the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811, and on the City's web site at:

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

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

The City is soliciting views of interested persons and agencies on the content of the environmental information presented in this document as of March 23, 2016. Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but no later than the 30-day review period ending April 22, 2016.

The City's Planning and Design Commission hearing is tentatively scheduled for May 12, 2016.

Please send written responses to:

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

SECTION II - PROJECT DESCRIPTION

PROJECT LOCATION

The project proposes development on approximately 3.76 acres of existing buildings, parking, and ornamental landscaping, with 0.88 acre sidewalk improvements adjoining the site. The site is bordered by Leisure Lane to the north, Expo Parkway to south, private land slated for the Advanced Health Care Center of Sacramento to the west (APN 275-0310-008), and existing development to the east, within the City of Sacramento (City) (APN 275-0260-068), Sacramento County. (Figures 1 and 2).

PROJECT SETTING AND SURROUNDING LAND USE

The project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. It was accounted for in the City's 2035 General Plan, and Master Environmental Impact Report (MEIR), and the project is consistent with the 2035 General Plan land use designation (Suburban Center); it would not require any change to the current zoning (C-2-LI, or General Commercial Labor Intensive Overlay Zone). The project would require splitting of the existing parcel boundary (APN 275-0260-068), and demolishing of the existing western portion of the Red Lion Woodlake Hotel and Conference Center structures, parking, and landscaping.

The proposed project is located in close proximity to the Johnston Business Park (which includes various industrial and commercial businesses), and two health care facilities to the southeast (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center). Commercial uses, such as a Costco and other retail stores are located to the southeast and east of the project beyond the conference center. Just west of the project site is the recently approved Advanced Health Care of Sacramento project. Development of the site as proposed would not alter the natural landscape, as the site is completely developed and consists of extant buildings, pavement, and ornamental landscaping. The project site has been designated for urban development in the 2035 General Plan and the Planning and Development Code; the proposed development is consistent with these planning designations.

PROJECT COMPONENTS

The project proposes the subdivision of an 18-acre parcel into two parcels, and the construction of a one- to three-story, 99,487 square foot residential care facility housing assisted living residents and memory care residents, along with sidewalk improvements bordering the project site. Refer to Figure 3 for the proposed project site plan. The multi-story building will cover approximately 0.96 acre of the project site, and approximately 1.50 acres of the site will be landscaped; the remaining areas of the site will either be asphalt concrete on aggregate base (such as the parking areas), hardscape, or concrete paved areas.

Specific project elements include 113 patient suites (~~79~~ ~~88~~ suites for assisted living residents, ~~34~~ ~~25~~ suites for memory care residents), craft/activity room, exercise therapy room, café, commercial kitchen, dining rooms, library, computer stations, theatre, card room, lounge, laundry and approximately 65 surface parking spaces. The use of ambulances for this facility is anticipated to be infrequent. The facility would be functional 24-hours a day with an estimated total staff of +/- 50. Due to the potential overlapping of staff, a maximum of 24 staff could be in the building at a time. Assuming three shifts for a single 24-hour day (as it is proposed to be a

24-hour facility), approximately 43 employees would be on-site during each 24-hour period, with the most staff present during the regular business hours. The proposed project would require a conditional use permit and development standards deviation due to the existence of an existing private sewer easement located in the southern portion of the property.

Additional features to be added to the project site include four fire hydrants (one that already exists) and two additional existing hydrants just offsite, a grease interceptor, an emergency backup generator, and associated infrastructure, including street and intersection improvements, sanitary sewer, storm drain, water, electric, and communication lines. Zoning for this parcel is C-2-LI, or general commercial labor intensive overlay zone; no change to the zoning for the site is required for the project. Approximately 4,200 cubic yards (CY) of cut and fill (net 3,000 CY import/export) would be necessary for project construction.

Attachments

Appendix A – Arborist Survey Form (HELIX Environmental 2015)

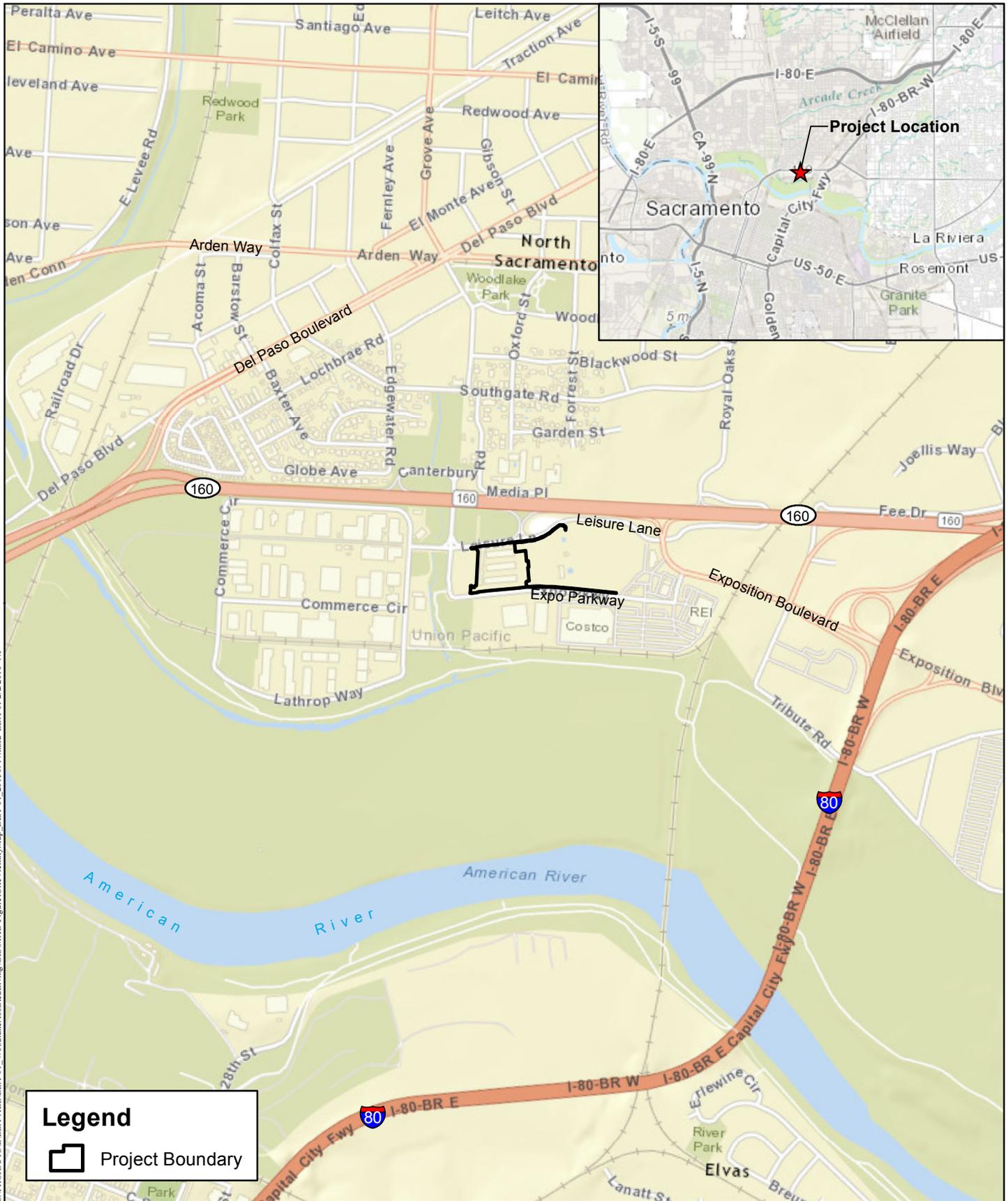
Appendix B – Climate Action Plan Consistency Review Checklist (HELIX Environmental 2016)

Appendix C – California Emissions Estimator Model Output (HELIX Environmental 2016)

Appendix D – Phase I Cultural Resources Assessment (HELIX Environmental 2015)

Appendix E – Geotechnical Engineering Report (Terracon Consultants 2015)

Appendix F – Phase I Environmental Site Assessment (Terracon Consultants, Inc., 2015)



Project Site and Vicinity

SACRAMENTO SENIOR LIVING

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Aerial Map

SACRAMENTO SENIOR LIVING

Figure 2

PROJECT INFORMATION

OWNER
 WOODLAKE CARE GROUP, LLC
 1910 FAIRVIEW AVENUE E, SUITE 200
 SEATTLE, WA 98102
 ATTN: ALEX WASHBURN

DEVELOPER/APPLICANT
 COLUMBIA PACIFIC ADVISORS
 C/O LENITY ARCHITECTURE
 3150 KETTLE CT. SE
 SALEM, OR 97301
 ATTN: GREG ELMORE

ENGINEER
 TSD ENGINEERING, INC.
 31 NATOMA STREET, SUITE 160
 FOLSOM, CA 95630
 ATTN: CASEY FEICKERT

ARCHITECT
 LENITY ARCHITECTURE
 3150 KETTLE CT. SE
 SALEM, OR 97301
 ATTN: DANIEL ROACH

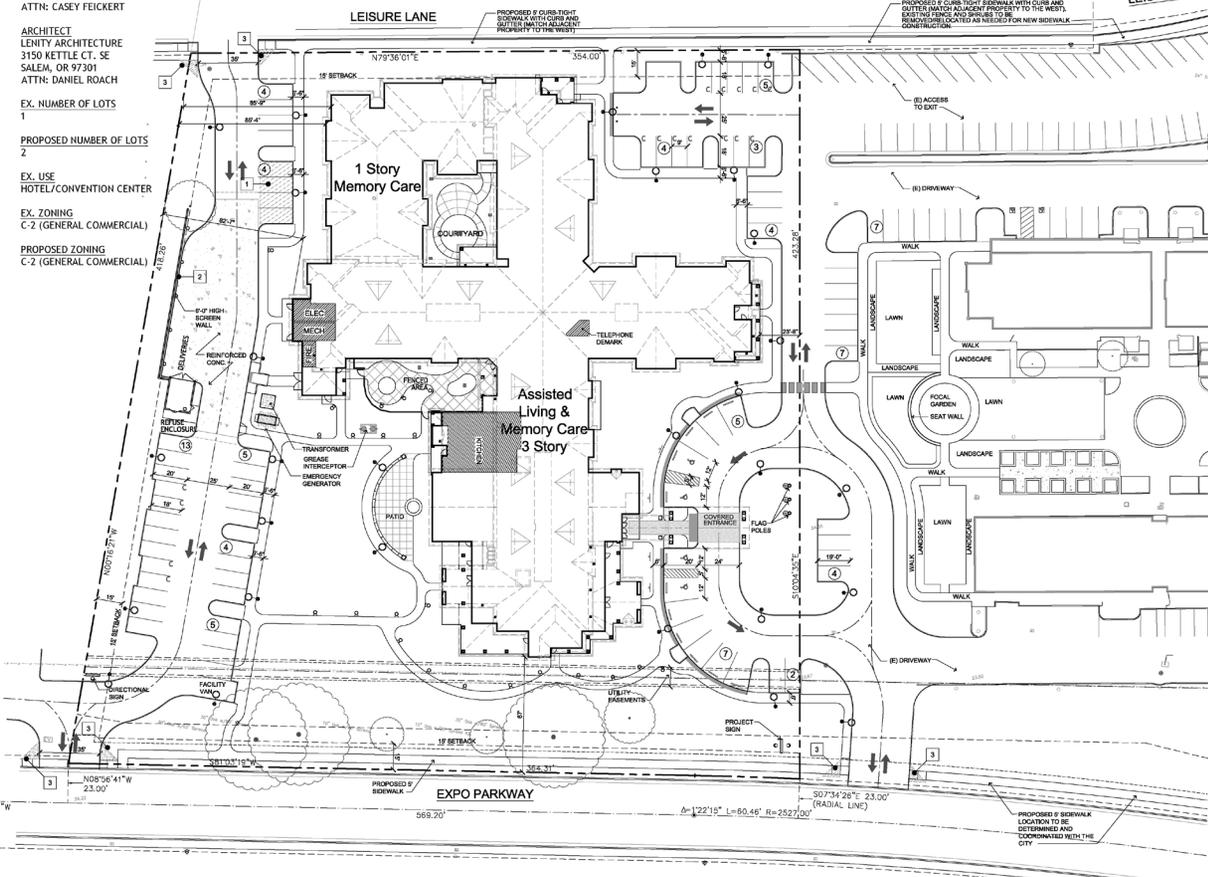
EX. NUMBER OF LOTS
 1

PROPOSED NUMBER OF LOTS
 2

EX. USE
 HOTEL/CONVENTION CENTER

EX. ZONING
 C-2 (GENERAL COMMERCIAL)

PROPOSED ZONING
 C-2 (GENERAL COMMERCIAL)



PROJECT DESCRIPTION
 ADDRESS: 500 LEISURE LANE
 APN: 275-0260-068

PROJECT AREA:
 TOTAL AREA: 3.76 AC +/- 162,730 SQ. FT.

BUILDING AREA:
 FIRST FLOOR: 41,853 SQ. FT.
 SECOND FLOOR: 28,356 SQ. FT.
 THIRD FLOOR: 29,278 SQ. FT.
 TOTAL: 99,487 SQ. FT.

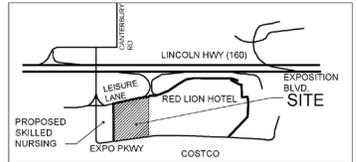
UNIT COUNT:
 88 ASSISTED LIVING SUITES
 23 MEMORY CARE SUITES
 113 SUITES

EXISTING AREA CALCULATIONS:
 TOTAL AREA 162,730 SQ. FT. 100%
 BLDGS/WALKS/PARKING: 124,766 SQ. FT. 76.7%
 OPEN SPACE: 37,964 SQ. FT. 23.3%

AREA CALCULATIONS:
 BUILDING FOOTPRINT: 41,853 SQ. FT. 25.7%
 PATIOS / WALKS: 19,930 SQ. FT. 12.2%
 DRIVES / PARKING: 35,424 SQ. FT. 21.8%
 OPEN SPACE: 65,523 SQ. FT. 40.3%

PARKING:
 44 OPEN SPACES
 4 ACCESSIBLE SPACES
 16 COMPACT SPACES
 1 FACILITY VAN
 65 TOTAL SPACES
 REQUIRED PER CODE 1 SPACE PER 3 BEDS
 136 BEDS - 46 SPACES
 PARKING RATIO: 1:1,421

Sacramento Woodlake

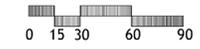


VICINITY MAP

- SITE PLAN KEY NOTES**
- 1 CLEAN AIR / EV PARKING WITH CHARGING STATION
 - 2 8'-0" HIGH SCREEN WALL TO MATCH TRASH ENCLOSURE
 - 3 10' WIDEN TRIANGLE FROM BACK OF SIDEWALK

Preliminary Site Plan

DATE: 12/11/2015
 SCALE: 1" = 30'-0"



S:\PROJECTS\LEA-ALL\LEA-01 - Woodlake Assisted Living Figures LEA-01 02/03/2016 -NP



Sacramento

Assisted Living and Memory Care

Sacramento, California

Source: Lenity Engineering 2015

Site Plan

SACRAMENTO SENIOR LIVING



Figure 3



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Legend

-  Project Boundary
- Tree**
-  To Remain
-  To Be Removed

Tree Location Map

SACRAMENTO SENIOR LIVING

SECTION III – ENVIRONMENTAL CHECKLIST

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

INTRODUCTION

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

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

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

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

DISCUSSION

Land Use

The project site has been designated as Suburban Center in the 2035 General Plan, and is zoned C-2-LI, or General Commercial Labor Intensive Overlay Zone.

The project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. The proposed project is located in close proximity to the Johnston Business Park (which includes various industrial and commercial businesses), and two health care facilities to the southeast (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center). The proposed and entitled Advanced Health Care of Sacramento is located just west of the project site, and the proposed and entitled Expo Parkway Behavioral Healthcare Hospital project is located to the southwest. Commercial uses, such as a Costco and other retail stores, are located to the southeast and east of the project beyond the conference center. The proposed project would alter the existing structures, but the redevelopment would be consistent with the 2035 General Plan and the Planning and Development Code planning designations.

Population and Housing

The 2035 General Plan MEIR identifies, estimates, and evaluates population and housing changes caused by development of the 2035 General Plan, which have the potential to cause physical and environmental effects (see MEIR, Chapter 4). The 2035 General Plan includes assumptions for the amount of growth that will occur within the Policy Area over the next 25 years. The General Plan assumes the City will grow by approximately 170,000 new residents, 86,000 new jobs, and 68,000 new housing units. The Population, Employment, and Housing analysis in the 2035 General Plan MEIR (Chapter 3) provides a detailed discussion of how the City reached these assumptions and the methodology used to determine a realistic level of growth for the City.

The project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. Surrounding land uses include commercial, light industrial, and hotel land uses. According to the 2035 General Plan, the City's average household size was 2.62 persons in 2010. The project does not propose to add any residents to the city of Sacramento; rather, it proposes to offer employment opportunities and in-patient health services to current residents. The project is consistent with the General Plan land use designation (Suburban Center); additionally, it would not require any change to the current zoning (C-2-LI, or General Commercial Labor Intensive Overlay Zone). Additionally, there are no existing houses on the project site; therefore, people and housing units would not be displaced as a result of project construction and implementation. The hotel is used primarily by those in attendance of events at the conference center. Impacts due to the development of proposed project related to population and housing would be less than significant.

Agricultural Resources

The MEIR discussed the potential impact of development under the 2035 General Plan on agricultural resources (see MEIR, Chapter 4.1.3). In addition to evaluating the effect of the general plan on sites within the City, the MEIR noted that, to the extent the 2035 General Plan accommodates future growth within the City limits, the conversion of farmland outside the City limits is minimized (see MEIR, Chapter 4.1.3). The MEIR concluded that the impact of the 2035 General Plan on agricultural resources within the City was less than significant.

The project site does not contain soils designated as Important Farmland (i.e., Prime Farmland, Unique Farmland or Farmland of Statewide Importance) (NRCS 2010). The site is not zoned for agricultural uses, and there are no known Williamson Act contracts that affect the project site. No existing agricultural or timber-harvest uses are located on or in the vicinity of the project site. Development of the site would result in no impacts on agricultural resources.

Energy

Structures built as part of the project would be subject to Titles 20 and 24 of the California Code of Regulations, which serve to reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. The 2035 General Plan includes Policies Utilities 6.1.9, 6.1.10-12, and 6.1.14 to encourage the use of energy-efficient technology by offering rebates and other incentives to commercial and residential developers, and recruiting businesses that research and promote energy conservation and efficiency.

Policies 6.1.6 through 6.1.8 focus on promoting the use of renewable resources, which would reduce the cumulative impacts associated with use of non-renewable energy sources. In

addition, Policies 6.1.10 and 6.1.13 call for the City to work closely with utility providers and industries to promote new energy conservation technologies.

The MEIR evaluated the potential impacts on energy and concluded that the effects would be less than significant (see Impacts 4.11-6 and 4.11-7). The proposed project would result in no new impacts not previously identified and evaluated in the MEIR.

AESTHETICS

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

ENVIRONMENTAL SETTING

The project site is located on the western portion of a parcel currently occupied by the Red Lion Hotel and Conference Center, to the east of the proposed Advanced Health Care Sacramento project (APN 275-0310-008). Other surrounding uses include the proposed and entitled Expo Parkway Behavioral Healthcare Hospital project is located to the southwest, the Johnston Business Park to the west, (which includes various industrial and commercial businesses), and two health care-related facilities to the southeast (an Apria Health Care facility and the administrative center for a radiological facility associated with Sutter Medical Center). Further to the south (approximately 525 feet) is the American River Parkway. State Route 160 is located approximately 325 feet north of the site. Commercial uses, such as a Costco and other retail stores, are located to the southeast and east of the project beyond the conference center. The structures currently located on the site are used for Red Lion Hotel and Conference Center overnight guests, primarily for those attending events at the hotel's conference center. The proposed project calls for seven buildings to be demolished, along with the associated parking and landscaping. Approximately 28 trees would be removed as a part of the project including but not limited to: twelve cypress trees, fourteen pistache trees, and two Valley oak trees. Trees that may require trimming or cutting back include: one valley oak tree along the western property line; nine Valley oaks, one holly oak, one live oak, one Chinese pistache, one palm, and one Aleppo pine along the southern property line; and 31 trees along the northern property line, according to the Arborist surveys done September 16, 2015 and November 23, 2015 (Appendix A). Trimming, cutting or removing of the Valley oak trees, or any tree activity within six and a half feet of a city street may be subject to a tree permit. Views of the project area are partially obscured from State Route 160 by trees.

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

STANDARDS OF SIGNIFICANCE

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

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

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, AND APPLICABLE GENERAL PLAN POLICIES

The MEIR describes the existing visual conditions in the general plan policy area, and the potential changes to those conditions that could result from development consistent with the 2035 General Plan (see MEIR, Chapter 4.13).

The MEIR identified potential impacts for glare (Impact 4.13-1). Policy ER 7.1.4 prohibits new development from:

- using reflective glass that exceeds 50 percent of any building surface and on the ground three floors;
- using mirrored glass
- using black glass that exceeds 25 percent of any surface of a building
- using metal building materials that exceed 50 percent of any street-facing surface of a primarily residential building.

This was identified to reduce the effect to a less-than-significant level and is enforced through the Site Plan and Design Review process. Light cast onto oncoming traffic or residential uses is identified as a potential project impact (Impact 4.13-1). The MEIR identified Policy LU 6.1.12 (Compatibility with Adjoining Uses) and its requirement that lighting must be shielded and directed downward as reducing the potential effect to a less-than-significant level.

ANSWERS TO CHECKLIST QUESTIONS

Questions A and B

- Consistent with the City's lighting standards and Policy LU 6.1.12 (Compatibility with Adjoining Uses), all proposed outdoor lighting would only cast light downward to reduce nocturnal skyglow and glare from the area. The project proposes street and building perimeter lighting that is typical for a commercial development. While the area immediately around the site is currently semi-dark and the project would introduce a new use with new lighting sources, these lighting sources are required to be consistent with the City's lighting standards. The area surrounding the project site consists of light industrial and commercial land uses, as well as the American River Parkway. Any additional lighting would therefore not affect residential land uses. The proposed lighting is within the guidelines provided by the General Plan and the American River Parkway Plan (County of Sacramento, 2008). The project would not create a source of glare that

would cause a public hazard or annoyance, nor would it create a new source of light that would cast onto oncoming traffic, residential uses, or the American River Parkway. The project consists of a multi-story structure and would not use: reflective glass that exceeds 50 percent of any building surface (and on the ground three floors); mirrored glass; black glass that exceeds 25 percent of any surface of a building, or; metal building materials that exceed 50 percent of any street-facing surface of a primarily residential building. Impacts related to these issues would be **less than significant**.

Question C

The project is located in an area developed primarily with industrial and commercial properties, with State Route 160 located to the north of the site. The project site is the western portion of the Red Lion Hotel and Conference Center, consisting of seven existing hotel buildings, a parking lot, and occasional landscaped plants. There are 28 trees expected to be removed as a part of the project: twelve cypress trees, fourteen pistache trees, and two Valley oak trees. One valley oak tree along the western property line; nine Valley oaks, one holly oak, one live oak, one Chinese pistache, one palm, and one Aleppo pine along the southern property line; and 31 trees along the northern property line, may require trimming or cutting back, according to the Arborist surveys done September 16, 2015 and November 23, 2015 (Appendix A). Trimming, cutting or removing of the Valley oak trees, or any tree activity within six and a half feet of a city street may be subject to a tree permit.

While grading and excavation would occur on site (600 cubic yards of cut and 3,600 cubic yards of fill, net 3,000 cubic yards import and export), the proposed building would be at a similar elevation to the existing light industrial and commercial buildings in the project vicinity.

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

MITIGATION MEASURES

None.

FINDINGS

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

AIR QUALITY

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

ENVIRONMENTAL SETTING

Regional Setting

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

Concentrations of emissions from criteria air pollutants (the most prevalent air pollutants known to be harmful to human health) are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, particulate matter (including respirable particulate matter with an aerodynamic diameter of 10 micrometers or less [PM₁₀] and fine particulate with an aerodynamic diameter of 2.5 micrometers or less [PM_{2.5}]), and carbon monoxide. Ozone is not directly emitted into the air but is formed through complex chemical reactions between precursor

emissions of reactive organic gases (ROG) and oxides of nitrogen (NO_x) in the presence of sunlight. ROG are volatile organic compounds that are photochemically reactive. ROG emissions result primarily from incomplete combustion and the evaporation of chemical solvents and fuels. NO_x are a group of gaseous compounds of nitrogen and oxygen that result from the combustion of fuels. Carbon monoxide is also emitted by automobiles and other vehicles. PM₁₀ and PM_{2.5} consist of particulate matter emitted directly into the air, such as fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires and natural windblown dust, and particulate matter formed in the atmosphere by reaction of gaseous precursors (CARB 2009).

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

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

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

The Basic Emission Control Practices

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

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

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

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

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

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

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

STANDARDS OF SIGNIFICANCE

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

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

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

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

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR addressed the potential effects of the 2035 General Plan on ambient air quality and the potential for exposure of people, especially sensitive receptors such as children or the elderly, to unhealthful pollutant concentrations (see MEIR, Chapter 4.2).

Policies in the 2035 General Plan (Environmental Resources) were identified as mitigating potential effects of development that could occur under the 2035 General Plan. For example, Policy Environmental Resources 6.1.1 calls for the City to work with the California Air Resources Board and the SMAQMD to meet state and federal air quality standards; Policy Environmental Resources 6.1.2 requires the City to review proposed development projects to ensure that the projects incorporate feasible measures that reduce construction and operational emissions; Policy Environmental Resources 6.1.4 requires coordination with the SMAQMD to protect public health and safety; and Policy Environmental Resources 6.1.15 requires the City to give preference to contractors using reduced-emission equipment.

The MEIR identified exposure to sources of TAC as a potential effect. Policies in the 2035 General Plan would reduce the effect to a less-than-significant level. The policies include Land Use 2.7.5, requiring development adjacent to stationary or mobile TAC sources to be designed with consideration of such exposure in design, landscaping and filters; as well as Policies Environmental Resources 6.1.2 and ER 6.1.4, referred to above.

The MEIR identified numerous policies included in the 2035 General Plan that addressed greenhouse gas emissions and climate change (see Draft MEIR, Chapter 4.14). The MEIR found that greenhouse gas emissions that would be generated by development consistent with the 2035 General Plan would be less than significant. The discussion of greenhouse gas emissions and climate change in the 2035 General Plan MEIR are incorporated by reference in this Initial Study (CEQA Guidelines Section 15150). Policies identified in the 2035 General Plan include directives relating to sustainable development patterns and practices, and increasing the viability of pedestrian, bicycle and public transit modes.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Construction of the proposed project would include demolition of the existing structures, and would include the construction of a 99,487 square foot residential care facility housing assisted living residents and memory care residents. Construction activities could commence as early as the summer of 2016 and would likely be completed within approximately 17 months. NO_x emissions would be generated by demolition and associated on-site equipment and truck activity associated with hauling materials, off-road construction equipment (e.g., dozers, excavators), truck activity associated with hauling materials to and from the site (although cut and fill would be balanced on site), and worker vehicle trips.

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

Control Practices. The Basic Emission Control Practices are discussed above in the Environmental Setting section.

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

The project does not:

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

As the project proposes demolition activities and cut-and-fill operations, including 3,000 cubic yards of soil import, the NO_x construction screening level is not recommended for use. As such, the California Emissions Estimator Model (CalEEMod) version 2013.2.2 was used to quantify project-generated construction emissions. The analysis methodology, assumptions, and CalEEMod output are provided in Appendix C.

As shown in Table 1, the proposed project would generate less than significant levels of the ozone precursor NO_x. Project impacts related to construction NO_x emissions would be **less than significant**.

Table 1	
Estimated Project Construction NO_x Emissions	
CONSTRUCTION YEAR	NO_x (lbs./day)
2016	55
2017	50
SMAQMD Threshold	85
Threshold exceeded?	No

Source of emissions: CalEEMod output (Appendix C)
 Source of Threshold: SMAQMD 2009

Question B

SMAQMD provides screening levels to identify when additional analysis is necessary to determine potential significance for operational ROG and NO_x emissions. The operational screening levels represent the development size at which the operational emissions thresholds of significance would not be exceeded. The proposed residential care facility would qualify as the CalEEMod Land Use of a hospital under the general land use category of commercial. According to the screening thresholds, if a proposed hospital is less than 229,000 square feet, or 320 beds, in size, then the facility would not have the potential to exceed SMAQMD's recommended mass emission thresholds of 65 pounds per day for NO_x or 65 pounds per day of ROG. Projects that are less than the screening level have been determined to result in less than significant NO_x and ROG impacts. Therefore, this impact would be **less than significant** for the proposed project.

Question C

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

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

As described in the response to Question D, construction-related and operational emissions of PM₁₀ and PM_{2.5} would not exceed the SMAQMD's recommended mass emission thresholds of 80 pounds per day of PM₁₀ and 82 pounds per day of PM_{2.5}. Therefore, the proposed project would not violate or contribute to a violation of the ambient air quality standards for PM₁₀ or PM_{2.5}.

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

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

Question D

The SMAQMD utilizes the same screening level as the NO_x emission screening level to assist a project proponent or lead agency in determining if PM₁₀ or PM_{2.5} emissions from constructing a project in Sacramento County will exceed the SMAQMD's construction significance thresholds. As with the NO_x screening presented above, because the proposed project includes demolition activities, cut-and-fill operations, and soil import, the PM₁₀ and PM_{2.5} construction screening level is not recommended for use. As such, CalEEMod was used to quantify project-generated

construction emissions as discussed previously. The analysis methodology, assumptions, and CalEEMod output are provided in Appendix B.

The maximum daily emissions of PM₁₀ and PM_{2.5} are analyzed below. As shown in Table 2, the proposed project would generate less than significant levels of PM₁₀ and PM_{2.5}. Impacts related to construction-generated PM₁₀ and PM_{2.5} emissions would be **less than significant**.

Table 2 Estimated Project Construction PM Emissions		
CONSTRUCTION YEAR	PM₁₀ (lbs./day)	PM_{2.5} (lbs./day)
2016	21	13
2017	3	3
SMAQMD Threshold	80	82
Threshold exceeded?	No	No

Source of emissions: CalEEMod output (Appendix C)
 Source of Threshold: SMAQMD 2009

Question E

Local mobile-source CO emissions near roadway intersections are a direct function of traffic volume, speed, and delay. Long-distance transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. Under specific meteorological conditions and traffic conditions, CO concentrations at receptors located near roadway intersections may reach unhealthy levels, when combined with background CO levels.

The SMAQMD’s two-tiered screening criteria identifies when a project has the potential to contribute to a CO hotspot and if CO dispersion modeling is necessary. According to the first screening tier, the proposed project will result in a less-than-significant impact to air quality for local CO if:

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

As detailed in Response to Question B in Section 11, Transportation and Circulation, the project would not degrade peak period LOS to E or F or contribute additional traffic to an intersection already operating at LOS E or F. For this reason, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the 1-hour ambient air quality standard of 20 ppm or the 8-hour standard of 9 ppm. As a result, this direct impact would be **less than significant**.

Question F

As explained in the response to Questions A through E, construction-related emissions of NO_x would not exceed SMAQMD’s mass emission threshold of 85 lb/day, operational emissions of

ROG and NO_x would not exceed SMAQMD's recommended emission thresholds of 65 pounds per day, construction emissions of PM₁₀ would not be less than the SMAQMD's mass emission thresholds of 80 lb/day, and CO concentrations would not exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm). For these reasons, construction- and operation operation-related emissions of criteria air pollutants and precursors would not result in exposure of sensitive receptors to substantial pollutant concentrations. Moreover, as explained in the response to Question G, the level of TAC concentrations and related health risk exposure to sensitive receptors would not be substantial. As a result, this impact would be **less than significant**.

Question G

Construction activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) from the exhaust of off-road, heavy-duty diesel equipment. CARB identified DPM as a Toxic Air Contaminant (TAC) in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. Health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, are typically based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project.

As presented earlier in Table 2, maximum daily particulate emissions, which include DPM, would be relatively low when compared to the SMAQMD thresholds. Additionally, the construction period would be relatively short (less than 2 years), especially when compared to 70 years. Combined with the highly dispersive properties of DPM, construction-related emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The impact would be **less than significant**.

The CARB Land Use Handbook recommends not siting new sensitive land uses within 500 feet of a major roadway carrying more than 100,000 vehicles per day. The project site is located near SR 160, which, according to Caltrans traffic counts, carries less than 100,000 vehicles per day. Potential health risks due to project vicinity to the existing roadway is **less than significant**.

As the proposed project would involve the development of a residential care facility, project operation would not introduce any new stationary sources of TACs such as diesel-fueled backup generators that are more commonly associated with large commercial and industrial uses. In addition, the project would not result in a significant increase to the number of diesel fueled vehicles on the road. As such, the proposed project would not have the potential to expose sensitive receptors to TACs from mobile sources to an extent that health risks could result. This impact would be **less than significant**.

Question H

In 2012, the City adopted a communitywide Climate Action Plan (CAP) which was incorporated into the 2035 General Plan. The CAP identified a greenhouse gas (GHG) emissions reduction target of 15 percent below 2005 levels by 2020 for communitywide emission sources, and also set longer term communitywide GHG emission reduction goals of 38 percent below 2005 levels by 2030 and 83 percent below 2005 levels by 2050. The CAP contains a comprehensive set of

strategies, measures and implementing actions to achieve the 2020 GHG reduction target. The GHG reduction measures and actions apply to both existing sources within the City as of the 2005 baseline as well as projected emissions from new growth and development anticipated in the 2035 General Plan. The CAP also identifies potential adverse physical effects related to climate change on the community, and includes specific adaptation measures to address and mitigate such effects.

The City has prepared a Climate Action Plan Consistency Checklist for use in determining project consistency with the CAP pursuant to Section 15183.5 (Appendix B; HELIX 2016).

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

- Substantial consistency with the 2035 General Plan
 - The project is consistent with the General Plan land use designation (Suburban Center); additionally, it would not require any change to the current zoning (C-2-LI, or General Commercial Labor Intensive Overlay Zone).
- Incorporation of pedestrian facilities and connections to transit consistent with the Pedestrian Master Plan
 - The proposed project site plan features numerous pedestrian access points and pedestrian access features with opportunities for pedestrians to access the site from surrounding streets and other parts of the site. Sidewalk improvements will extend east of the project site, so major conflicts between vehicles and pedestrians are not expected. The project would also comply with the City development standards and regulations, which address hazards or barriers for pedestrian or bicycle access.
- Energy and water efficiency standards
 - The project shall comply with the adopted CAP by meeting the Tier 1 Voluntary Standards for Health Facilities (OSHFD 1, 2 & 4) in the 2013 California Green Building Standards Code (CALGreen).

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

MITIGATION MEASURES

None.

FINDINGS

The project would have no additional significant environmental effects relating to air quality/greenhouse gas emissions.

BIOLOGICAL RESOURCES

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

ENVIRONMENTAL SETTING

Regional Setting

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

Local Setting

The project site is located north of the American River and east of the Johnston Business Park in a moderately developed area near downtown Sacramento. The immediate urban setting is mainly occupied by commercial development, and residential development north of SR 160, with some open spaces nearby that attract non-native and very common wildlife species. The site is approximately 0.5 miles from the American River, and approximately 750 feet from the American River Parkway. The American River and the Parkway contain stretches of riparian habitat, woodlands, and grasslands that serve as important wildlife habitat and migratory corridors for a variety of native species. Some species, like raptors, could utilize urban habitat for nesting and forage along the river corridor. Therefore, while the site is urban in nature, its close proximity to the American River allows for the potential for use by native and sensitive species. Most natural habitats have been removed through industrial, commercial, and residential development.

Habitat immediately adjacent to the project site mainly consists of highly disturbed non-native annual grasslands. Onsite, the majority of landcover is a hardscape of seven buildings and parking, occasionally landscaped with trees and shrubs. There are 74 trees within or immediately adjacent to the project limits of work. There are no jurisdictional wetlands, riparian, or other special status habitats located on or immediately adjacent to the project site. Observed suburban and urban wildlife included, rock pigeon, black phoebe, oak titmouse, European starling, western scrub jay, northern mockingbird, and American crow.

Regulatory Background

Clean Water Act (33 USC 1252-1376)

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

Section 401 of the CWA requires that an applicant for a federal license or permit that allows activities resulting in a discharge to waters of the U.S. must obtain a state certification that the discharge complies with other provisions of CWA. The Regional Water Quality Control Board (RWQCB) administers the certification program in California, and may require State Water Quality Certification before other permits are issued.

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

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

California Environmental Quality Act

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

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

California Department of Fish and Wildlife

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

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

Porter-Cologne Water Quality Control Act

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

City of Sacramento Tree Preservation Ordinance

The City adopted a Tree Preservation Ordinance to protect trees as an important resource for the community. When circumstances do not allow for retention of trees, permits are required to remove heritage trees that are within the City's jurisdiction. Chapter 12.64 of the Sacramento Municipal Code regulates the cutting or modification of heritage trees; requires a Tree Permit prior to cutting or modification; and establishes protection standards during construction activities. Heritage trees include:

- Any tree of any species with a trunk circumference of on hundred (100) inches or more, which is of good quality in terms of health, vigor of growth, and conformity to generally accepted horticultural standards of shape and location for its species.

- Any native *Quercus* species, *Aesculus californica* or *Plantanus racemosa*, having a circumference of 36 inches or greater when a single trunk, or a cumulative circumference of 36 inches or greater when a multi-trunk, which is of good quality in terms of health, vigor of growth and conformity to generally accepted horticultural standards of shape and location for its species.
- Any tree 36 inches in circumference or greater in a riparian zone. The riparian zone is measured from the centerline of the water course to 30 feet beyond the high water line.
- Any tree, grove of trees or woodland trees designated by resolution of the City Council to be of special historical or environmental value or of significant community benefit.

In addition, the Street Tree Ordinance (Chapter 12.56 of the Sacramento Municipal Code) states that “No person shall remove, trim, prune, cut or otherwise perform any maintenance on any city street tree without first obtaining a permit from the director pursuant to Section 12.56.070.” Any non-heritage street tree planned for cutting or modification would require a permit from the City.

Sensitive Biological Resources

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

- CNDDDB record search within 10 mile radius of the project site (2015)
- Sacramento General Plan 2035 (2015)

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

Special-status Species

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

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

- List 4: Plants of limited distribution – a watch list.

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

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

Reconnaissance level field surveys were conducted on September 15, 2015 and November 23, 2015, to assess the presence of habitats within the study area necessary to support special-status species. Meandering transects were performed on foot throughout the study area, and the entire site was visually observed.

Special-Status Plants

No protocol-level botanical surveys for any special-status species were conducted on the project site. However, nine special status plant species have been documented in the CNDDDB within a 10-mile radius of the project site. There are six special-status species that are within vernal pools and other wet habitats and include dwarf *downingia*, *legenere*, Bogg's Lake hedge-hyssop, wooly rose-mallow, Suisun marsh aster, and Sanford's arrowhead. Because of the existing developed conditions of the site and the lack of required wetland habitats necessary for these species to exist, they have been eliminated from further evaluation. Three special-status species that are known to grow in dryer habitats and include: Ferris' milk-vetch, northern California black walnut and stinkbells. Ferris' milk-vetch is a CNPS list 1B.1 species that prefers valley and foothill grasslands with clay or adobe clay soils from 5 to 245 ft. Northern California black walnut is a CNPS list 1B.1 species that occurs naturally in riparian woodlands or forests with deep alluvial soils from 0 to 1,445 ft. Currently, only two of three native stands are still in existence. Stinkbells, so named because of its strong odor, is a species of lily commonly associated with non-native annual grasslands with heavy clay soils from 30 to 5,100 feet. It blooms from March to June and also favors other habitat types such as chaparral, cismontane woodland, and pinyon and juniper woodland. Stinkbells have also been documented on serpentine soils. Because the site lacks the natural habitat for these species, they have been eliminated from further evaluation.

Special-Status Wildlife

Thirty-two special-status wildlife species have been documented in the CNDDDB 10-mile search area. All species were immediately eliminated from further evaluation in this document because they are restricted to particular habitat types (e.g., vernal pools, streams, ponds, riparian woodland, forests) that are not present on the completely developed project site:

- Swainsons hawk
- White-tailed kite
- Cooper's hawk
- Hoary bat
- American badger
- Tricolored blackbird
- Golden eagle
- Burrowing owl

- Ferruginous hawk
- Merlin
- Song sparrow (Modesto population)
- Purple martin
- Bank swallow
- Least Bell's vireo
- Great egret
- Great blue heron
- Western pond turtle
- Giant garter snake
- Sacramento perch
- Central Valley steelhead
- Chinook salmon - spring-run
- Sacramento splittail
- Longfin smelt
- Vernal pool fairy shrimp
- Midvalley fairy shrimp
- Sacramento Valley tiger beetle
- Valley elderberry longhorn beetle
- Hairy water flea
- Ricksecker's water scavenger beetle
- Valley elderberry beetle
- Vernal pool tadpole shrimp
- California linderiella

Sensitive Habitats and Special-Status Plant Communities

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

CDFW maintains a list of plant communities that are native to California. Within that list, CDFW identifies special-status plant communities (a.k.a. sensitive natural communities), which they define as communities that are of limited distribution statewide or within a county or region and often vulnerable to environmental effects of projects (CDFW 2015b). These communities may or may not contain special-status species or their habitat. Special-status plant communities are tracked in the CNDDDB, a statewide inventory of the locations and conditions of the state's rarest plant and animal taxa and vegetation types.

No native plant communities on CDFW's list of special-status plant communities are present on the project site. Both elderberry savanna and Great Valley cottonwood riparian forest are located within the 10-mile radius, along the American River.

Waters of the U.S./Waters of the State

There are no potential wetlands or waters of the United States within this site. The site is completely developed, with paved roads, extant buildings, and ornamental landscaping. There

is no natural habitat onsite. No wetlands or waters were observed during the field surveys conducted September 16, and November 23, 2015.

Mature Trees

There are 28 trees expected to be removed as a part of the project: twelve cypress trees, fourteen pistache trees, and two Valley oak trees. Trees that may require trimming or cutting back include: one valley oak tree along the western property line; nine Valley oaks, one holly oak, one live oak, one Chinese pistache, one palm, and one Aleppo pine along the southern property line; and 31 trees along the northern property line, according to the Arborist surveys done September 16, 2015 and November 23, 2015 (Appendix A). No heritage trees exist on the site. Several trees may qualify as City Street Trees. Trimming, cutting or removing any of the trees, or any tree activity within six and a half feet of a city street, may be subject to a tree removal permit.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

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

Impact 4.3-1: Implementation of the 2035 General Plan could adversely affect special-status plant species due to the substantial degradation of the quality of the environment or reduction of population or habitat below self-sustaining levels.

Impact 4.3-2: Implementation of the 2035 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status invertebrates.

Impact 4.3-3: Implementation of the 2035 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels with special-status birds, through the loss of both nesting and foraging habitat.

Impact 4.3-4: Implementation of the 2035 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status amphibians and reptiles.

Impact 4.3-5: Implementation of the 2035 General Plan could result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status mammals.

Impact 4.3-9: Implementation of the 2035 General Plan could result in the loss of California Department of Fish and Game (CDFG)-defined sensitive natural communities such as elderberry savanna, northern claypan vernal pools, and northern hardpan vernal pools.

Impact 4.3-11: Implementation of the City's 2035 General Plan and regional buildout assumed in the Sacramento Valley could result in a regional loss of special-status plant or wildlife species or their habitat.

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

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

Impact 4.3-7: Implementation of the 2035 General Plan could result in the loss or modification of riparian habitat, resulting in a substantial adverse effect.

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

Impact 4.3-8: Implementation of the 2035 General Plan could result in a substantial adverse effect on state or federally protected wetlands and/or waters of the United States through direct removal, filling, or hydrological interruption.

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

Impact 4.3-12: Implementation of the 2035 General Plan and regional buildout assumed in the Sacramento Valley could contribute to the cumulative loss of sensitive natural communities including wetlands and riparian habitat in the region.

The project as proposed includes implementation of Mitigation Measures 4.3-7 and 4.3-8 from the MEIR as required by the City.

Standards of Significance

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

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

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

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 4.3 of the MEIR evaluated the effects of the 2035 General Plan on biological resources within the General Plan policy area. The MEIR identified potential impacts in terms of degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status birds, through the loss of both nesting and foraging habitat.

Policies in the 2035 General Plan were identified as mitigating the effects of development that could occur under the provisions of the 2035 General Plan. Policy 2.1.5 calls for the City to preserve the ecological integrity of creek corridors and other riparian resources; Policy Environmental Resources 2.1.10 requires the City to consider the potential impact on sensitive plants for each project and to require pre-construction surveys when appropriate; and Policy 2.1.11 requires the City to coordinate its actions with those of the CDFW, USFWS, and other agencies in the protection of resources.

The MEIR concluded that the cumulative effects of development that could occur under the 2035 General Plan would be significant and unavoidable as they related to effects on special-status plant species (Impact 4.3-1), reduction of habitat for special-status invertebrates (Impact 4.3-2), loss of habitat for special-status birds (Impact 4.3-3), loss of habitat for special-status amphibians and reptiles (Impact 4.3-4), loss of habitat for special-status mammals (Impact 4.3-5), special-status fish (Impact 4.3-6) and, in general, loss of riparian habitat, wetlands and sensitive natural communities such as elderberry savannah (Impacts 4.3-7 through 4.3-9).

ANSWERS TO CHECKLIST QUESTIONS

Question A

The site has previously been developed and does not contain known hazardous materials, therefore site preparation activities associated with the project, including demolishing, excavating, grading, and trenching, are not likely to disturb contaminated soil containing hazardous substances, which could cause injury or death to special-status species. The proposed project would not significantly change its current use. No changes in the effects on special-status species are anticipated to occur, as long as best management practices are used for hazardous materials. Please refer to the Hazards section of this Initial Study regarding the risk of an accidental release of hazardous substances that could adversely affect special-status

species. Since there are no known hazardous materials onsite, a **less than significant** impact from hazardous materials on special-status species.

Question B

The project site provides limited value to threatened and endangered wildlife species because it is developed with structures and impervious surfaces, and has been improved with landscaping with little or no natural vegetation. The redevelopment of the site would not eliminate any habitat important to the long-term survival of any species or community and would not substantially reduce the number or restrict the range of any species.

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

Due to the urban nature of the site, it is unlikely that Swainson's hawks would occupy the trees on site. However, Swainson's hawk nests were found approximately 0.5 miles south along the American River. There are 28 trees expected to be removed as a part of the project: twelve cypress trees, fourteen pistache trees, and two Valley oak trees. Trees that may require trimming or cutting back include: one valley oak tree along the western property line; nine Valley oaks, one holly oak, one live oak, one Chinese pistache, one palm, and one Aleppo pine along the southern property line; and 31 trees along the northern property line, according to the Arborist surveys done September 16, and November 23, 2015 (Appendix A). Trimming, cutting or removing of the Valley oak trees, or any tree activity within six and a half feet of a city street may be subject to a tree permit.

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

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

Question C

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

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

There are no native wildlife nursery sites or established migratory routes through the project site that are vital for the movement of any resident or migratory fish or wildlife species or population. Project implementation would not interfere substantially with the movement of native resident or migratory wildlife species because the site currently developed with a hotel and is surrounded by urban development and does not currently provide an important connection between any areas of natural habitat that would otherwise be isolated.

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

MITIGATION MEASURES

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

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

adversely affect the nest. Monitoring of the nest by a qualified biologist will be required if the activity has potential to adversely affect the nest.

FINDINGS

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

CULTURAL RESOURCES

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

ENVIRONMENTAL SETTING

The project site is located on the western end of the Red Lion Hotel and Conference Center complex and consists of paved parking areas, four hotel buildings, and another set of buildings collectively called "Building F," slated for demolition and minimal landscape elements. A records search was conducted by HELIX Senior Archaeologist, Carrie D. Wills, at the North Central Information Center (NCIC) of the California Historical Resources Information Center on July 17, 2015 (NCIC file number SAC-15-123). The results indicate that the project area has not been subject to a systematic survey for cultural resources, and no prehistoric or historic period resources have been recorded at the information center within or adjacent to the project area. The North Sacramento Freeway (State Route 160) which is approximately 325 feet north of the project area has been previously recorded as a historic resource. The proposed project would have no effect on this result.

A letter was sent to the Native American Heritage Commission (NAHC) on July 24, 2015 requesting a search of the Sacred Lands files. A follow up email was sent on August 18, to inquire about the status of the search but as of this date, no response has been received. The City complied with its responsibility under AB 52 by notifying requesting tribes of the project, and inviting consultation. No timely request for consultation was received within the 30-day response period provided in Public Resources Code 21080.3.1.

A field survey of the project area was conducted on July 17, 2015. Because the project area is completely covered with asphalt and buildings, there was no ground surface visibility. The survey focused on recording and photographing the extant buildings. The buildings within the project limits of work were evaluated by HELIX Architectural Historian, Kathleen Crawford, as follows.

BUILDING EVALUATION

The subject property contains multiple buildings that are part of the larger Red Lion Hotel and Conference Center complex (originally named the Lakewood Inn and/or Woodlake). The first buildings on the property were constructed in the late 1950s and the buildings that will be demolished during project development were constructed in the early 1960s as part of the hotel's expansion process. The buildings under consideration are located at the west end of the

property and include three, one-story, rectangular shaped, Modern Spanish style buildings, and one, two-story, irregular shaped, Modern Spanish style building. The three one-story buildings were constructed in rows, running east to west with hotel rooms along the north and south elevations of each building, with parking lots in between each structure. The two-story building was placed at the far end of the property and extends along the sides of the three one-story buildings and runs north to south with hotel rooms along the east elevation. These four buildings are used as hotel rooms for guests. Another set of three Modern Spanish style, one-story buildings to be demolished, collectively called "Building F," was also considered. Building F is placed in an L-shaped configuration in the central portion of the hotel property, and are basically rectangular shaped.

The three one-story hotel room buildings are similar in style and have concrete foundations, stucco exteriors and flat roofs. The fronts of the buildings on the east elevation contain an arched section that rises above the roofline. This section contains the name of the specific building. The area under the roof sections has a flat roof with faux *vigas* (a rough-hewn roof timber or rafter, especially on an adobe building). Square columns with square capitals support the roof sections. The space between the columns and wall is infilled with small bushes. The west elevation of each building is basically blank with column detailing. The buildings contain multiple hotel rooms placed in a single row along the north and south facades. Each unit has a single wood door flanked by metal framed, double hung sash style and fixed pane, rectangular shaped windows. The walkways along the elevations contain shed roofs which are supported by square columns with small square capitals. The parking spaces are located immediately outside the door of each unit for ease of parking. Small landscaped areas bracket the parking areas and the ends of the buildings. Additional trees are located along the parking areas for shade and greenery purposes.

The two-story building has a concrete foundation, stucco exterior, and a flat roof. The front of the building, the south elevation, contains a large arched parapet section which extends to the east, culminating in a two-story wing wall with a tall, arched opening. The section provides a screen for the metal staircase behind it. The section has a flat roof and a back wall with arched openings, as well as a screened portion on the east elevation. The section is supported by the same square columns as seen on the other buildings. The rooms extend along the east elevation of the building and include the same details as seen on the smaller buildings. The individual rooms have single wood door entrances which are flanked by metal framed, fixed pane and double hung sash style windows for each unit. The second floor units are accessed by the staircase at the south end of the building and a balcony with a metal railing extends along the length of the building. The roof extends out over the balcony area and is supported by square columns. Landscaping is present around the sides of the building.

The structures collectively called Building F vary in size, but are basically rectangular shaped. The three buildings have concrete foundations, stucco exteriors, and flat roofs. The asymmetrical design, rectangular shaped buildings lack any significant exterior detail or ornamentation. The buildings have large blocks of blank wall space broken by delivery entrances or guest entrances. Vertical columns divide open bays along the side of buildings. Windows are fixed pane, and rectangular shaped. The buildings are surrounded by access roads and drives, small parking areas, with small areas of minimal landscaping.

The subject property was examined for potential historical and architectural significance for the local City of Sacramento Register of Historic & Cultural Resources, State of California Register of Historical Resources, and the National Register of Historic Places. The building complex is not considered to meet any of the established criteria for significance. The hotel complex is one

of many chain hotels in the Sacramento area and has played no significant role in the development of the city of Sacramento or the State of California. No persons of any level of historic significance are associated with the design or development of the property. None of the buildings are considered to be architecturally significant as they are standard examples of Modern motel architecture with no innovative or unusual characteristics. The buildings are not good examples of a type, style, or method of construction of Modern architecture. The buildings do not have the ability to convey any important information regarding their design, use, or development of the subject property. Therefore, none of the buildings on the subject property are considered to be historically or architecturally significant at the local, state or federal levels.

Photographs and a Department of Parks and Recreation (DPR) Primary form for the four buildings, and the additional Building F, are provided in Appendix C.

No historic or prehistoric artifacts, features, resources, or sites were discovered during the course of the field survey.

STANDARDS OF SIGNIFICANCE

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

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the potential effects of development under the 2035 General Plan on prehistoric and historic resources (see Chapter 6.4). The MEIR identified significant and unavoidable effects on historic resources and archaeological resources.

General plan policies identified as reducing such effects call for identification of resources on project sites (Policy HCR 2.1.1), implementation of applicable laws and regulations (Policy HCR 2.1.2 and HCR 2.1.16), early consultation with owners and land developers to minimize effects (Policy HCR 2.1.10), and encouragement of adaptive reuse of historic resources (Policy HCR 2.1.13). Demolition of historic resources is deemed a last resort (Policy HCR 2.1.15).

ANSWERS TO CHECKLIST QUESTIONS

Question A and C

A cultural resource assessment consisting of a record search at the NCIC, a request for a search of the NAHC Sacred Lands file, a pedestrian survey and evaluations of the seven buildings slated for demolition was conducted for the project area. The field survey was negative for historic or pre-contact artifacts, features, resources, or sites. The extant buildings slated for demolition were evaluated and are considered not eligible for listing on the NR, the CRHR, the City of Sacramento or any other local listings. Therefore, demolition of the seven buildings would not result in a significant impact to a historical resource as defined by CEQA Guidelines Section 15064.5.

However, although the project area does not contain any historical resources and implementation of the proposed project would not be expected to impact any historical resources, construction of the proposed project could result in the inadvertent discovery of undocumented archaeological materials or human remains and the disturbance or destruction of a known historical or archaeological resource. Therefore the project could result in **potentially significant impacts** related to cultural resources. Implementation of Mitigation Measures CUL-1 through CUL-3 described below would reduce the impacts to a **less than significant** level.

Question B

As discussed in Section 4.5, Geology, of the General Plan MEIR, the City of Sacramento is not considered sensitive for paleontological resources, and the likelihood for finding something paleontologically significant would be very low (page 4.5-7). The General Plan Policy HCR 2.1.16 requires compliance with protocols that protect or mitigate impacts to archeological, historic, and cultural resources, including prehistoric resources, should anything be discovered during excavation or construction. The City also interprets this policy to address paleontological resources (MEIR, page 4.5-7).

Although the project area is not considered sensitive for paleontological resources and the likelihood of encountering paleontological resources is considered very low, project-related ground disturbing activities could affect the integrity of a previously unknown paleontological resource, resulting in a substantial change in the significance of the resource. Therefore, project development could result in **potentially significant impacts** to paleontological resources. Implementation of Mitigation Measures CUL-3 and CUL-4 described below would reduce the impacts to **less than significant**.

MITIGATION MEASURES

Mitigation Measure CUL-1: *In the event that subsurface historic or prehistoric archeological features or deposits are discovered during construction-related ground disturbing activities, all work within 50 meters of the resource shall be halted, and the City shall consult with a qualified archaeologist to assess the significance of the find. If warranted, archaeological test excavations shall be conducted by a qualified archaeologist to aid in determining the nature and integrity of the find. If the find is determined to be significant by the qualified archaeologist, representatives of the City and the qualified archaeologist shall coordinate to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis and professional museum curation. In addition, a report shall be prepared by the qualified archaeologist according to current professional standards.*

Mitigation Measure CUL-2: *If a Native American site is discovered, the evaluation process shall include consultation with the appropriate Native American representatives. If Native American archaeological, ethnographic, or spiritual resources are involved, all identification and treatment shall be conducted by qualified archaeologists, who are listed in the Register of Professional Archaeologists (RPA) and/or meet the Secretary of Interior Standards as stated in the Code of Federal Regulations (36 CFR 61), and Native American representative(s) assigned by the Native American Heritage Commission.*

Mitigation Measure CUL-3: *If human remains are discovered during project development, CEQA Guidelines § 15064.5; Health and Safety Code § 7050.5; Public Resources Code § 5097.94 and § 5097.98 must be followed. If human bone or bone of unknown origin are discovered, there shall be no further excavation or disturbance of the site or any nearby area*

reasonably suspected to overlie adjacent human remains until the Sacramento County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains are Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” (MLD) of the deceased Native American(s). The MLD shall make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.

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

FINDINGS

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

GEOLOGY

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

ENVIRONMENTAL SETTING

General

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

STANDARDS OF SIGNIFICANCE

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 4.5 of the MEIR evaluated the potential effects related to seismic hazards, underlying soil characteristics, slope stability, erosion, existing mineral resources and paleontological resources in the general plan policy area. Implementation of identified policies in the 2030 General Plan reduced all effects to a less than significant level. Policies EC 1.1.1 and 1.1.2 require regular review of the City's seismic and geologic safety standards, and geotechnical investigations for project sites.

ANSWERS TO CHECKLIST QUESTIONS

Question A

The 2035 General Plan indicates that ground shaking would occur periodically in Sacramento as a result of distant earthquakes. The State of California provides minimum standards for building design through the California Building Standards Code (CBSC) (Title 24 of the California Code of Regulations). The CBSC is based on more the federal Uniform Building Code (UBC) but is more detailed and stringent than the federal UBC. Specific minimum seismic safety requirements are set forth in Chapter 23 of the CBSC. The state earth protection law (California Health and Safety Code Section 191000 et seq.) requires that buildings be designed to resist stresses produced by lateral forces caused by earthquakes. Earthquake resistant design and materials are required to meet or exceed the current seismic engineering standards of the CBSC Seismic Risk Zone 3 improvements. The proposed project would be required to comply with CBSC requirements and the City's 2030 General Plan and MEIR, which require project applicants to prepare site-specific geotechnical evaluations and conformance with Title 24 of the California Code of Regulations.

Soil liquefaction is the loss of strength of low- to no-cohesion soils (usually sands) that occurs when pore water pressure exceeds the confining stress (weight) of the soils. Liquefaction normally occurs only under saturated conditions and in soils with a low relative density. Liquefaction can occur during earthquakes as vibrations induce soils to readjust to a more compact state. Experience has shown that earthquake induced liquefaction normally occurs only within the upper 50 to 60 feet of the soil profile. The test borings at the project site show that the subsurface soils vary from asphalt and base at the surface, to clayey sand and sandy lean clay far below. Based on the depth of groundwater together with the relatively dense to hard nature of the deeper soils, the potential for liquefaction during a seismic event is negligible (Terracon Consultants 2015).

Per City requirements (2035 MEIR Policy EC 1.1.2), a geotechnical investigation of the site has been completed (Terracon Consultants 2015) to determine the potential for ground rupture, earth shaking, and liquefaction due to seismic events, as well as expansive soils problems. Construction activities would involve demolition, excavating, filling, moving, grading, and temporarily stockpiling soils onsite, which would remove any vegetative cover and expose site soils to erosion from wind and surface water runoff. The City has adopted standard measures to control erosion and sediment during construction and all projects in the City are required to comply with the City's Standard Construction Specifications for Erosion and Sediment Control. The proposed project would comply with the City's standards set forth in the "Administrative and Technical Procedures Manual for Grading and Erosion and Sediment Control." The project would also comply with the City's grading ordinance (Chapter 15.88 of Sacramento City Code) which specifies construction standards to minimize erosion and runoff. As required by the City, recommendations identified in the 2015 geotechnical engineering report for the proposed development would also be implemented (Terracon Consultants 2015).

Because the proposed project would be required to comply with federal, state, and local construction standards, it would not expose people or structures to the risk of loss, injury, or death. In addition, these standards along with recommendations for project construction based on the findings of the investigation provided in the geotechnical engineering report for the site (related to project earthwork, foundations, seismic design, the grade of the floor slabs, and pavements) require the project applicant to identify and protect against potential hazards from ground-shaking, liquefaction, unstable soil conditions, and/or soil erosion problems on the project site. Therefore, a **less than significant** seismic impact would occur.

MITIGATION MEASURES

None.

FINDINGS

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

HAZARDS

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

ENVIRONMENTAL AND REGULATORY SETTING

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

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

A field survey of the site was conducted whereby no indicators of hazards materials were noted on site. However, the project site consists of seven buildings currently in use, necessitating demolition as part of project implementation.

SMAQMD Rule 902 and Commercial Structures

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

- 260 linear feet of RACM on pipes, or
- 160 square feet of RACM on other facility components, or
- 35 cubic feet of RACM that could not be measured otherwise.

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

Asbestos Surveys

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

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

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

Removal Practices, Removal Plans/Notification and Disposal

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

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

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

STANDARDS OF SIGNIFICANCE

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

- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities;
- expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials; or
- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities.
- obstruct emergence response or access such that response times are substantially affected.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated effects of development on hazardous materials, emergency response and aircraft crash hazards. See Chapter 4.6. Implementation of the General Plan may result in the exposure of people to hazards and hazardous materials during construction activities, and exposure of people to hazards and hazardous materials during the life of the General Plan. Impacts identified related to construction activities and operations were found to be **less than significant**. Policies included in the 2035 General Plan, including PHS 3.1.1 (investigation of sites for contamination) and PHS 3.1.2 (preparation of hazardous materials actions plans when appropriate) were effective in reducing the identified impacts.

ANSWERS TO CHECKLIST QUESTIONS

Question A

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

Question B

Project construction requires that seven structures on the project site be demolished and the materials to be hauled away. These structures could potentially contain asbestos or other hazardous materials. A Phase I Environmental Site Assessment was conducted by Terracon Consultants, Inc. on March 13, 2015. Surveys for asbestos were not conducted as part of their scope of services. Recognized Environmental Conditions (RECs) were not identified in association with site in terms of site operations, processes and equipment; aboveground chemical and waste storage; underground chemical or waste storage, drainage, or collection systems; electrical transformers/PCBs; releases or potential releases; and other site operations.

Refer to response to Question A above regarding the potential for the project to expose people to other hazardous materials besides asbestos during the construction period.

The existing structures could contain asbestos and lead based paint. There is potential for exposure to asbestos when the buildings are demolished. Exposure pathways by which receptors could be exposed to hazardous materials include:

- direct dermal contact with hazardous materials
- incidental ingestion of hazardous materials (e.g. if workers fail to wash their hands before eating, drinking, or smoking); and
- inhalation of airborne dust released from dried hazardous materials.

Implementation of Mitigation Measure HAZ-1 described below would reduce the impacts to a less than significant level. The proposed mitigation requires that an asbestos and/or lead based paint survey be completed prior to initiating construction activities. Hazardous material found

during the survey would be removed and disposed of in compliance with all applicable regulations and guidelines, including SMAQMD Rule 902.

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

Since construction and operations of the project would limit the exposure of people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials with mitigation; this impact would be **less than significant**.

Question C

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

MITIGATION MEASURES

Mitigation Measure HAZ-1: *Prior to initiating construction activities, the Applicant/Developer shall retain a certified lead and asbestos inspector to survey the buildings for lead and asbestos. If such substances are found to be present, the Applicant/Developer shall have a licensed contractor properly remove and dispose of these hazardous materials in accordance with federal, state, and local laws. All removal activities shall be completed prior to demolition activities.*

FINDINGS

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

HYDROLOGY AND WATER QUALITY

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

ENVIRONMENTAL SETTING

The project site is currently developed and consists of structures (four full wings and a partial wing), parking and occasionally landscaped plants associated with the Red Lion Hotel and Conference Center (HELIX Environmental 2015). The site is located approximately 0.5 mile north of the American River and approximately 2.7 miles east of the Sacramento River; however, the site contains no creeks, wetlands or other hydrologic features. The project site is in an urbanized area with many commercial and light industrial uses in the near vicinity. The project site has mostly impervious surfaces; as a result, storm water is either absorbed on site or drains to the adjacent storm drain system.

The Federal Emergency Management Agency (FEMA) publishes Flood Insurance Rate Maps (FIRM) that delineate flood hazard zones for communities. The Project site is located within an area designated as Zone X (Community Panel Number 06067C0177J). This zone is applied to areas of 0.2 percent annual chance flood; areas of 1 percent annual chance flood with average depths of less than one foot, or with drainage areas less than one square mile; and areas protected by levees from 1 percent annual chance flood. The project site is in an area protected from the one percent annual chance (100-year) flood by levee, dike, or other structures subject to possible failure or overtopping during larger storms. FEMA does not have building regulations for development in areas designated Zone X and would not require mandatory flood insurance for structures in Zone X.

The public wastewater collection system with the City includes a combined sewer system (CSS) in the older Central City and a newer separated sewer system (sanitary sewer) in the remaining areas of the City (including the project site) and is the treatment service type for this project. The Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (SASD) provide both collection and treatment services within their service area for the portions of the city served by the separate sewer system. Wastewater generated in this area is serviced by the City of Sacramento through the collection system and is discharged downstream of this project into SRCSD's interceptors to the Sacramento Regional Wastewater Treatment Plant (SRWTP).

The community plan areas served by the City's separate sewer system include the Pocket, North Sacramento, and portions of Arden-Arcade, South Sacramento, East Sacramento, East Broadway and Airport Meadowview. The areas served by the City's separate sewer systems are divided into dozens of sewer sheds, and wastewater from the basins is pumped to the SRWTP via numerous pumping stations located throughout the City.

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

The City's separate storm drainage system includes conveyance of storm water and dry weather urban runoff to the adjacent creeks and rivers. The separate drainage system consists of street drains, conveyance systems, and usually a pump station to discharge into either the Sacramento or American River. These discharges are regulated for water quality by the Regional Water Quality Control Board NPDES permit No. CAS082597. The County of Sacramento and the cities of Sacramento, Folsom, Citrus Heights, Elk Grove, Rancho Cordova, and Galt have a joint NPDES permit (No. CAS082597) that was granted in December 2002. The permittees listed under the joint permit have the authority to develop, administer, implement, and enforce storm water management programs within their own jurisdiction. The permit is intended to implement the Basin Plan through the effective implementation of BMPs to reduce pollutants in stormwater discharges to the maximum extent practicable (MEP).

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

The Sacramento City Code Section 13.08.145 addresses mitigation of drainage impacts; design and procedures manual for water, sanitary sewer, storm drainage, and water quality facilities. The code requires that when a property contributes drainage to the storm drain system or combined sewer system, all storm water and surface runoff drainage impacts resulting from the improvement or development must be fully mitigated to ensure that the improvement or development does not affect the function of the storm drain system or combined sewer system, and that there is no increase in flooding or in water surface elevation that adversely affects individuals, streets, structures, infrastructure, or property. These requirements will be included as conditions of project approval and development not allowed to proceed without compliance.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

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

Impact 4.7-3: Implementation of the 2035 General Plan could increase exposure of people and/or property to risk of injury and damage from a major flood event.

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

STANDARDS OF SIGNIFICANCE

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

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 4.7 of the MEIR evaluates the potential effects of the 2035 General Plan as they relate to surface water, groundwater, flooding, stormwater and water quality. Potential effects include water quality degradation due to construction activities (Impacts 4.7-1, 4.7-2), and exposure of people to flood risks (Impacts 4.7-3). Policies included in the 2035 General Plan, including a directive for regional cooperation (Policies ER 1.1.2, EC 2.1.1, EC 2.1.1), comprehensive flood management (Policy EC 2.1.14), and construction of adequate drainage facilities with new development (Policy U 4.1.1) were identified that reduced all impacts to a less-than-significant level.

ANSWERS TO CHECKLIST QUESTIONS

Question A

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

The City's SQIP contains a Construction Element that guides in implementation of the NPDES Permit for Storm Water Discharges Associated with Construction Activity. This General Construction Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP should contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must list BMPs the discharger will use to protect storm water runoff and the placement of those BMPs. Additionally, the SWPPP must

contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit describes the elements that must be contained in a SWPPP. Compliance with City requirements to protect storm water inlets would require the developer to implement BMPs such as the use of straw bales, sandbags, gravel traps, and filters; erosion control measures such as vegetation and physical stabilization; and sediment control measure such as fences, dams, barriers, berms, traps, and basins. City staff also inspects and enforce the erosion, sediment and pollution control requirements in accordance with City codes (Grading, Erosion and Sediment Control ordinance).

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

Operation-Related Impacts

The proposed project would consist of 113 patient suites (~~79~~ 88 suites for assisted living residents, ~~34~~ 25 suites for memory care residents), craft/activity room, exercise therapy room, café, commercial kitchen, dining rooms, library, computer stations, theatre, card room, lounge, laundry and 70 surface parking spaces (60 standard, 5 compact, 1 facility van, and 4 Americans with Disabilities Act [ADA] accessible spaces). The majority of the site would be covered by impervious surfaces. This would decrease storm water absorption, and increase storm water discharges and flows, with the potential to violate water quality standards associated with urban runoff (nonpoint-source pollutants) to storm drains.

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

Question B

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

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

MITIGATION MEASURES

None.

FINDINGS

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

NOISE

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

ENVIRONMENTAL SETTING

The existing noise environment in the project area is defined primarily by the traffic on State Route 160. Although traffic occurs on Expo Parkway and Leisure Lane, it is not a significant contributor to the overall noise environment. In addition, the Red Lion Hotel and Conference Center has a cooling tower on the southeast corner of the project site. Although it was identified as a potential noise source to the proposed Advanced Health Care project, this project will include its demolition, therefore nullifying it as a noise source.

Existing Noise Receptors

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

Existing Ambient Daytime Noise Levels

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

To generally quantify existing ambient noise levels in the project vicinity, a short-term ambient noise measurement was conducted at the project site. The ambient noise measurement locations are shown in the baseline noise measurements taken by HELIX Environmental Planning on February 5, 2016. The short-term measurement conducted on the site was conducted near the freeway entrance/exit that is located north of the project boundary. The measured noise level was 63 A-weighted decibels (dB) L_{eq} (HELIX Environmental 2016), where L_{eq} is the equivalent steady-state noise level or energy-averaged sound level over a stated period of time (i.e., average noise level), and A-weighted decibels are a frequency-dependent weighting of sound levels that better represent human perception of noise. A long-term (24-hour) measurement was not collected.

GENERAL PLAN POLICIES CONSIDERED MITIGATION

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

Impact 4.8-4: Implementation of the 2035 General Plan could permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction.

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

Impact 4.8-3: Implementation of the 2035 General Plan could result in potential for construction noise levels to exceed the standards of the City of Sacramento Noise Ordinance.

Impact 4.8-5: Implementation of the 2035 General Plan could result in cumulative impacts on adjacent residential and commercial areas being exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations.

General Plan Policy EC 3.1.6 – Effects of Vibration: The city shall consider potential effects of vibration when reviewing new residential and commercial projects that are proposed in the vicinity of rail lines or light rail lines.

Impact 4.8-6: Implementation of the 2035 General Plan could permit historic buildings and archeological sites to be exposed to vibration-peak-particle velocities greater than 0.25 inches per second due to project construction, highway traffic, and rail operations.

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

STANDARDS OF SIGNIFICANCE

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

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the potential for development under the 2035 General Plan to increase noise levels in the community. New noise sources include vehicular traffic, aircraft, railways, light rail and stationary sources. The general plan policies establish exterior (Policy EC 3.1.1) and interior (EC 3.1.3) noise standards. A variety of policies provide standards for the types of development envisioned in the general plan. See Policy EC 3.1.8, which requires new mixed-use, commercial and industrial development to mitigate the effects of noise from operations on adjoining sensitive land use, and Policy 3.1.9, which calls for the City to limit hours of operations for parks and active recreation areas to minimize disturbance to nearby residences. Notwithstanding application of the general plan policies, noise impacts for exterior noise levels (Impact 4.8-1) and interior noise levels (Impact 4.8-2), and vibration impacts (Impact 4.8-4) were found to be significant and unavoidable.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Generation of Stationary-Source Noise

The project proposes to construct a multi-story assisted living and memory care facility, and improve sidewalks bordering the project site. Operational noise sources for such a facility would typically include heating, ventilation, and air conditioning (HVAC) equipment. Stationary noise sources are regulated by the exterior noise limits contained within the City municipal code. Section 8.68.060 of the code states that the exterior noise limit at the property boundary for residential property is 55 dBA during the daytime period (7:00 a.m. to 10:00 p.m.) and 50 dBA during the nighttime period (10:00 p.m. to 7:00 a.m.) at the property line of noise-sensitive uses. Compliance with the noise is mandatory, and would reduce any potential impacts to neighboring uses to **less than significant** levels.

Exterior Exposure to Stationary-Source Noise

The primary off-site stationary noise source that would affect the proposed noise-sensitive uses on the project site is the cooling tower associated with the Red Lion Hotel and Conference Center at the southwest corner of the project site. With the demolition of this cooling tower included in the project, it will no longer be a potential exterior stationary source of noise.

Generation of Traffic Noise

Operation of the project would result in an overall decrease in vehicle trips and associated increases in traffic noise levels along roadways in the project area. Based upon information gathered by the Institute of Transportation Engineers (ITE) *Trip Generation, 9th Edition*, the proposed project is expected to generate 16 trips during AM peak hour, 25 trips during PM peak hour, and 304 daily trips.

The ADT for the portion of State Route 160 that is located approximately 325 feet north of the site is estimated to be 45,900 ADT from the City of Sacramento 2035 General Plan MEIR. It generally takes a doubling of traffic to result in an increase of 3 dB of roadway traffic noise; a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dB increase in sound would generally be perceived as barely detectable by the human ear. According to General Plan policy 3.1.2 (Exterior Incremental Noise Standards) mitigation is only required for development that increase existing noise levels by more than 2 dB in areas with noise levels between 60 L_{dn} and 65 L_{dn} . The project's minor contribution of 304 ADT would not lead to a 2 dB increase on a roadway carrying approximately 46,000 ADT. Therefore, the project traffic addition to the nearby segment of State Route 160 would result in a **less than significant** impact to off-site noise sensitive land uses.

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

Exterior Exposure to Traffic Noise

Traffic volumes for Cumulative + Project conditions for State Route 160 (SR 160) were obtained from the City of Sacramento 2035 General Plan MEIR. Truck usage on the area roadways were

estimated from field observations and file data. Traffic noise levels for Cumulative + Project conditions for State Route 160 were modeled for the proposed Advanced Health Care project that is directly west of the hotel. J.C. Brennan & Associates (2014) modeled traffic noise with the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA RD- 77-108).

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

Question B

Interior Exposure to Noise

The noise levels generated by the project would result in exterior noise levels of approximately 63 dBA Leq at the nearest residences proposed on the project site. Typical interior-to-exterior noise level reductions would provide a minimum of 25 dBA reduction with the windows closed; considering the exterior noise level of approximately 63 dBA Leq, interior noise levels would be less than the interior noise level standard of 45 dBA L_{dn}. However, should project windows remain open, interior noise levels could be in excess of the 45 dBA L_{dn} standard. This would be a potentially **significant** impact; Implementation of Mitigation Measure NOI-1 would reduce this impact to a less than significant level.

Question C

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

Title 8 – Health and Safety, Chapter 8.68 of the City’s municipal code exempts certain activities from Chapter 8.68, including “noise sources due to the erection (including excavation), demolition, alteration or repair of any building or structure” as long as these activities are limited to between the hours of 7 a.m. and 6 p.m. Monday through Saturday, and between the hours of 9 a.m. and 6 p.m. on Sunday. All construction equipment and truck deliveries would occur during the daytime hours exempt by the City of Sacramento noise ordinance (7:00 a.m. to 6:00 p.m. Monday through Saturday and from 9:00 a.m. to 6:00 p.m. on Sunday). Compliance with the proposed General Plan policies and the restriction of construction noise as outlined in the City’s Noise Ordinance contained would reduce the severity of construction noise from development under the proposed General Plan; this impact would be **less than significant**.

Question D

Generation of construction-related ground-borne vibration would primarily occur during construction of the utility connections and project building. Pile driving is one of the main sources of vibration that can occur during the construction process for a project; however, no pile driving would be necessary for construction of the proposed project. For projects of this size, a vibratory roller may be utilized for foundation or on-site driveway construction. A vibratory

roller creates approximately 0.210 inches per second PPV at 25 feet, according to the Transportation and Construction Vibration Guidance Manual (Caltrans 2013). The nearest noise sensitive land use is located about directly adjacent to the project boundary (Red Lion Hotel and Conference Center); as vibration levels at this distance would be a maximum of 0.210 inches per second PPV, and as this is below the City's 0.5 inches per second PPV threshold, impacts related to excessive ground-borne vibration due to project construction would be **less than significant**.

Question E

No rail lines or transit stations of any type are located within 200 feet of the proposed project boundary; traffic along State Route 160, which is approximately 325 feet from the project boundary, would not cause perceptible vibration at the project site. Impacts related to vibration from rail operations or highway traffic would be **less than significant**.

Question F

As stated in the response to Question D, if a vibratory roller is utilized during project construction, it would generate a maximum vibration level of approximately 0.210 in/sec PPV at a distance of 25 feet. There are no historic buildings or archaeological sites located in close proximity to the project site; surrounding land uses include the Johnston Business Park (which is comprised of various industrial and commercial businesses), two health care facilities (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center), the Red Lion Hotel and Conference Center, and commercial uses (such as a Costco and other retail stores). As there are no historic buildings or archaeological sites within close proximity to the project site, project-related construction would not expose any historic buildings or known archaeological sites to vibration levels that exceed a peak particle velocity of 0.20 inches per second; this impact would be **less than significant**.

MITIGATION MEASURES

Mitigation Measure NOI-1: The project shall include the installation of air conditioning so that residents and people occupying the facility can close windows and doors to ensure the appropriate acoustical isolation is present.

FINDINGS

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

PUBLIC SERVICES

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
9. <u>PUBLIC SERVICES</u>			
A) Would the project result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan?			X

ENVIRONMENTAL SETTING

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

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

STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the potential effects of the 2035 General Plan on various public services. These include parks (Chapter 4.9) and police, fire protection, schools, libraries and emergency services (Chapter 4.10).

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

General plan policies that call for the City to consider impacts of new development on schools (see, for example, Policy ERC 1.1.2 setting forth locational criteria, and Policy ERC 1.1.4 that encourages joint-use development of facilities) reduced impacts on schools to a less-than-significant level. Impacts on library facilities were also considered less than significant (Impact 4.10-5).

ANSWERS TO CHECKLIST QUESTIONS

Question A

The proposed project would redistribute existing development in the project area by demolishing the existing hotel wings and adding an assisted living and memory care facility. It would also improve sidewalks bordering the project site. The project would not result in increased demand for fire protection, police protection, or school facilities, beyond that which was analyzed in the City's General Plan MEIR because the project is consistent with the City's General Plan and won't require any changes to the existing zoning. Additionally, the project would not result in an increase in school-aged children in the project vicinity. Therefore, consistent with the MEIR's conclusions, implementation of the proposed project would result in a **less than significant** impact related to fire protection services, police protection service, and school facilities.

MITIGATION MEASURES

None.

FINDINGS

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

RECREATION

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

ENVIRONMENTAL SETTING

The proposed project is located in close proximity to the Johnston Business Park (which includes various industrial and commercial businesses), and two health care facilities to the southeast (an Apria Health Care facility and a radiological facility associated with Sutter Medical Center). Additionally, the proposed Advanced Health Care facility is located just west of the project. The American River Parkway is located approximately 750 feet (0.1 mile) to the south of the project site. The American River Parkway is an open space greenbelt which extends approximately 29 miles from Folsom Dam at the northeast to the American River’s confluence with the Sacramento River at the southwest. There are several distinct areas of the Parkway, each having individual features which contribute to their separate identities. The lower American River (LAR) is classified as a “Recreation” river within the State and Federal Wild and Scenic River Systems. The river is the central focus of the Parkway which provides enjoyment to residents and visitors of the Sacramento region (County of Sacramento, 2008). Discovery Park is located west of the site within the American River Parkway. There are generally no residential land uses in the areas surrounding the project site.

STANDARDS OF SIGNIFICANCE

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

- cause or accelerate substantial physical deterioration of existing area parks or recreational facilities; or
- create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan.

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 4.9 of the MEIR considered the effects of the 2035 General Plan on the City’s existing parkland, urban forest, recreational facilities and recreational services. The General Plan identified a goal of providing an integrated park and recreation system in the City (Goal ERC 2.1). New residential development will be required to dedicate land, pay in-lieu fees or otherwise contribute a

fair share to the acquisition and development of parks and recreation facilities. (Policy ERC 2.2.5) Impacts were considered less than significant after application of the applicable policies. (Impacts 4.9-1 and 4.9-2)

ANSWERS TO CHECKLIST QUESTIONS

Question A and B

As the project does not propose new residential land uses that would create a need for additional recreational and park facilities, the project would not cause or accelerate substantial physical deterioration of existing area parks or recreational facilities. Additionally, the project would not create a need for the construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan. Impacts related to recreational facilities would be **less than significant**.

MITIGATION MEASURES

None.

FINDINGS

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

TRANSPORTATION AND CIRCULATION

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

ENVIRONMENTAL SETTING

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

Based upon information gathered by the Institute of Transportation Engineers (ITE) *Trip Generation, 9th Edition* the Assisted Living development (ITE land use 254) is expected to generate 16 trips during AM peak hour, 25 trips during PM peak hour, and 304 daily trips. It should be noted that this is a conservative estimate and actual traffic volumes associated with the project would likely be much lower since this facility will have two specialty equipped private vans to transport patients.

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

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

GENERAL PLAN POLICIES CONSIDERED MITIGATION

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

Impact 4.12-2: Implementation of the 2035 General Plan could result in adverse effects to roadway LOS within the Policy Area associated with planned future development in the region.

and

Impact 4.12-3: Implementation of the 2035 General Plan could result in potential adverse effects to roadway segments located in adjacent jurisdictions resulting from planned development under the 2035 General Plan, such that the jurisdictions minimum acceptable LOS thresholds are not met.

General Plan Policy M 1.2.2 - LOS Standard: The City shall implement a flexible context-sensitive Level of Service (LOS) standard, and will measure traffic operations against the vehicle LOS thresholds established in this policy. The City will measure Vehicle LOS based on the methodology contained in the latest version of the Highway Capacity Manual (HCM) published by the Transportation Research Board. The City's specific vehicle LOS thresholds have been defined based on community values with respect to modal priorities, land use context, economic development, and environmental resources and constraints. As such, the City has established variable LOS thresholds appropriate for the unique characteristics of the City's diverse neighborhoods and communities. The City will strive to operate the roadway network at LOS D or better for vehicles during typical weekday conditions, including AM and PM peak hour with the following exceptions described below:

a. Core Area (Central City Community Plan Area) LOS F allowed.

b. Priority Investment Areas LOS F allowed.

c. LOS E Roadways LOS E is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values:

- 65th Street: Elvas Avenue to 14th Avenue
- Arden Way: Royal Oaks Drive to I-80 Business

- Broadway: Stockton Boulevard to 65th Street
- College Town Drive: Hornet Drive to La Riviera Drive
- El Camino Avenue: I-80 Business to Howe Avenue
- Elder Creek Road: Stockton Boulevard to Florin Perkins Road
- Elder Creek Road: South Watt Avenue to Hedge Avenue
- Fruitridge Road: Franklin Boulevard to SR 99
- Fruitridge Road: SR 99 to 44th Street
- Howe Avenue: El Camino Avenue to Auburn Boulevard
- Sutterville Road: Riverside Boulevard to Freeport Boulevard

LOS E is allowed on all roadway segments and associated intersections located within ½ mile walking distance of light rail stations.

d. Other LOS F Roadways LOS F is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values:

- 47th Avenue: State Route 99 to Stockton Boulevard
- Arcade Boulevard: Marysville Boulevard to Roseville Road
- Carlson Drive: Moddison Avenue to H Street
- El Camino Avenue: Grove Avenue to Del Paso Boulevard
- Elvas Avenue: J Street to Folsom Boulevard
- Elvas Avenue/56th Street: 52nd Street to H Street
- Florin Road: Havenside Drive to Interstate 5
- Florin Road: Freeport Boulevard to Franklin Boulevard
- Florin Road: Interstate 5 to Freeport Boulevard
- Folsom Boulevard: 47th Street to 65th Street
- Folsom Boulevard: Howe Avenue to Jackson Highway
- Folsom Boulevard: US 50 to Howe Avenue

e. Context-Specific LOS: If maintaining the above LOS standards would, in the City's judgment be infeasible and/or conflict with the achievement of other goals, LOS E or F conditions may be accepted provided that provisions are made to improve the overall system, promote non-vehicular transportation, and/or implement vehicle trip reduction measures as part of a development project or a city-initiated project. Additionally the City shall not expand the physical capacity of the planned roadway network to accommodate a project beyond that identified in Figure M4 and M4a (2035 General Plan Roadway Classification and Lanes).

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

STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts resulting from changes in transportation or circulation

may be considered significant if construction and/or implementation of the proposed project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

Roadway Segments

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

Intersections

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

Freeway Facilities

Caltrans considers the following to be significant impacts.

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

Transit

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

Bicycle Facilities

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

Pedestrian Circulation

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Transportation and circulation were discussed in the MEIR in Chapter 4.12. Various modes of travel were included in the analysis, including vehicular, transit, bicycle, pedestrian and aviation components. The analysis included consideration of roadway capacity and identification of levels of service, and effects of the 2035 General Plan on the public transportation system. Provisions of the 2035 General Plan that provide substantial guidance include Goal Mobility 1.1, calling for a transportation system that is effectively planned, managed, operated and maintained, promotion of multimodal choices (Policy M 1.2.1), identification of level of service standards (Policy M 1.2.2), development of a fair share funding system for Caltrans facilities (Policy M 1.5.6) and development of complete streets (Goal M 4.2).

While the General Plan includes numerous policies that direct the development of the City's transportation system, the MEIR concluded that the general plan development would result in significant and unavoidable effects (see Impact 4.12-3 (roadway segments in neighboring jurisdictions), and Impact 4.12-4 (freeway segments)).

ANSWERS TO CHECKLIST QUESTIONS

Questions A and B

The proposed project was accounted for in the City's General Plan, and MEIR, and the project is consistent with the General Plan land use designation. Once completed, the project will generate additional trips on the road network. The anticipated trip generation from the project is estimated as 16 hourly vehicle trips during the morning peak hours (7:00-9:00 AM), 25 hourly vehicle trips during the afternoon peak hour (4:00-6:00 PM), and 304 daily trips.

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

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

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

Question C

As mentioned above for questions A and B, the proposed project was accounted for in the City's General Plan, and MEIR, and the project is consistent with the General Plan land use designation. State Route 160 is located approximately 325 feet north of the project site; the only segment of State Route 160 that was assessed in the MEIR was State Route 160 between Tribute Road and Business 80, which is located east of the project site. According to the MEIR, this freeway segment currently operates at LOS C. The proposed project and the associated 25 maximum peak-hour trips (see response to Questions A and B) would not affect the freeway ramp queue, or reduce the LOS of this freeway ramp; impacts related to freeway facilities would be **less than significant**.

Question D

The project area is served by a fully developed roadway system of arterial and local streets. Existing roadway, pedestrian, and public-transit infrastructure would remain in place and as currently designed and the project would not substantially change the existing movement of persons and traffic through the project area. The proposed project is anticipated to result in the addition of visitors to the site, mostly in the form of employees and patients; some of whom would travel by transit. As described for Questions A and B, a maximum of 25 PM peak hour trips could be expected with the proposed project. Some may use other modes of transportation, but it is not expected that the majority would do so as there are no bus or transit stations within 0.5 mile of the project. Further, as the proposed project was accounted for in the City's General Plan, and MEIR, and as the project is consistent with the General Plan land use designation, the proposed project is not expected to adversely affect public transit operations, or fail to adequately provide for access to public transit. As such, the proposed project's impacts to transit facilities are considered to be **less than significant**.

Questions E and F

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

MITIGATION MEASURES

None.

FINDINGS

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

UTILITIES

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

ENVIRONMENTAL SETTING

Wastewater

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

Stormwater

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

Water Supply

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

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

Solid Waste Disposal

Commercial solid waste materials collected by the Solid Waste Division of the City Department of Utilities are sorted at either the Sacramento Recycling and Transfer Station (owned by BLT Enterprise) or the North Area Transfer Station, owned by the County of Sacramento Public Works Department; City waste transported from the City's transfer stations is then transported to Lockwood Landfill in Lockwood, Nevada. The City of Sacramento General Plan MEIR indicates that the City landfills have sufficient capacity for full buildout of the 2035 General Plan.

Electricity and Natural Gas

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

STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, or school facilities beyond what was anticipated in the 2035 General Plan:

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

SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MEIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The MEIR evaluated the effects of development under the 2035 General Plan on water supply, sewer and storm drainage, solid waste, electricity, natural gas and telecommunications (see Chapter 4.11).

The MEIR evaluated the impacts of increased demand for water that would occur with development under the 2035 General Plan. Policies in the general plan would reduce the impact generally to a less than significant level (see Impact 4.11-1) but the need for new water supply facilities results in a significant and unavoidable effect (Impact 4.11-2). The potential need for expansion of wastewater treatment facilities was identified as having a less than significant impact (Impacts 4.11-3, 4.11-4). Impacts on solid waste facilities were less than significant

(Impacts 4.11-5, 4.11-6). Implementation of energy efficient standards as set forth in Titles 20 and 24 of the California Code of Regulations for residential and non-residential buildings would reduce effects for energy to a less-than-significant level.

ANSWERS TO CHECKLIST QUESTIONS

Question A

Water

The proposed project consists of a one- to three-story assisted living and memory care center; the facility would include 113 patient suites (~~79~~ ~~88~~ suites for assisted living residents, ~~34~~ ~~25~~ suites for memory care residents), craft/activity room, exercise therapy room, café, commercial kitchen, dining rooms, library, computer stations, theatre, card room, lounge, and laundry. The approximate number of employees at the facility is 50, with approximately 24 staff occupying the building at a given time. Assuming three shifts for a single 24-hour day (as it is proposed to be a 24-hour facility), approximately 43 employees would be on-site during each 24-hour period, with the most staff during regular business hours. Additionally, given that there are 113 patient rooms varying from private to semi-private, 136 patients will also be on site at a given time. This would yield a total of approximately 179 individuals on-site in a 24-hour period. Given that the 2010 UWMP for the City projects the annual water per capita demand for year 2015 to be 256 gallons per capita per day (gpcd) (City of Sacramento 2011), the project could require a maximum 45,824 gallons of water per day.

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

Wastewater and Stormwater

As described for the water subsection of Question A, approximately 24 staff will occupy the building at a given time. Assuming three shifts for a single 24-hour day (as it is proposed to be a 24-hour facility), approximately 43 employees would be on-site during each 24-hour period, with the most staff during regular business hours. Additionally, given that there are 113 patient rooms varying from private to semi-private, 136 patients will also be on site at a given time. This would yield a total of approximately 179 individuals on-site in a 24-hour period. Using the population-based flow factor identified in Section 4.11, Public Utilities, of the MEIR of 132.4 gallons per capita per day, the project would result in an increased demand of approximately 20,700 gallons per day. This flow was accounted for in the 2035 General Plan and MEIR; therefore, this impact would be **less than significant**.

Solid Waste

The City's 2035 General Plan MEIR provides solid waste generation rates for residential and employment (retail, office, industrial uses). For residential, the solid waste generation rate is 1.1 tons per unit per year and for employment uses, it is 10.8 pounds per employee day.

As described for the water subsection of Question A, approximately 24 staff will occupy the building at a given time. Assuming three shifts for a single 24-hour day (as it is proposed to be a 24-hour facility), approximately 43 employees would be on-site during each 24-hour period, with the most staff during regular business hours. . A total of 43 employees would generate 464 pounds per day of solid waste. This would equate to 169,506 pounds or 85 tons per year of waste from employees at the facility. Conservatively assuming that each of the patient rooms also generates 1.1 tons per year (based on the residential solid waste generation rate), an additional maximum of 124 tons per year would be generated by the facility. This would total 209 tons per year as a conservative estimate of solid waste generated by the project. Because the project is consistent with the General Plan land use designation, this increase in solid waste production would not exhaust the remaining landfill capacity and this impact would be **less than significant**.

Electricity and Natural Gas

Construction of the project would result in increased use of electricity and natural gas to support the assisted living and memory care facility. Both utility providers would install new distribution facilities, as needed, according to California Public Utilities Commission rules. Because the increased demand in energy is evaluated in the 2035 General Plan MEIR, and because PG&E and SMUD would ensure their capability of providing an adequate level of service to the project site, this impact would be **less than significant**.

Question B

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

MITIGATION MEASURES

None.

FINDINGS

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

MANDATORY FINDINGS OF SIGNIFICANCE

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

ANSWERS TO CHECKLIST QUESTIONS

Question A

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

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

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

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

Implementation of the proposed project could subject future tenants of the senior living facility to elevated noise levels. The project shall include the installation of air conditioning so that residents and people occupying the facility can close windows and doors to ensure the appropriate acoustical isolation is present as outlined in Mitigation Measure NOI-2.

Question B

Cumulative environmental effects are multiple individual effects that, when considered together, would be considerable or compound or increase other environmental impacts. Individual effects may result from a single project or a number of separate projects and may occur at the same place and point in time or at different locations and over extended periods of time. The proposed project would result in the in-fill construction and operation of a 113 patient suite senior living and memory care facility in the City, and would not affect population growth either directly or indirectly beyond that which was analyzed in the City's 2035 General Plan MEIR. Implementation of the MEIR and project-specific mitigation measures proposed in this Initial Study would reduce the project's impacts to a less than significant level, further reducing the project's contribution to environmental impacts to less than cumulatively considerable.

Question C

Exposure to asbestos and/or lead based paint during the demolition of the buildings within the project site is possible, as well as when the materials are hauled away. This can be mitigated by HAZ-1, which requires the City to retain a certified lead and asbestos inspector to survey the buildings to be demolished, and calls for safe and appropriate removal and disposal of the hazardous materials in accordance with federal, state, and local laws. With implementation of MEIR and project-specific mitigation measures for potential impacts identified in this Initial Study, the project would not have a substantial adverse effect on human beings, either directly or indirectly.

SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

SECTION V - DETERMINATION

On the basis of the initial study:

I find that (a) the proposed project is an anticipated subsequent project identified and described in the 2035 General Plan MEIR; (b) the proposed project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the MEIR are adequate for the proposed project; and (d) the proposed project will have additional significant environmental effects not previously examined in the MEIR. A Mitigated Negative Declaration will be prepared. Mitigation measures from the MEIR will be applied to the project as appropriate, and additional feasible mitigation measures and alternatives will be incorporated to revise the proposed project before the negative declaration is circulated for public review, to avoid or mitigate the identified effects to a level of insignificance. (CEQA Guidelines Section 15178(b))

Signature



Date

March 21, 2016

Scott Johnson
Printed Name

REFERENCES

- California Air Resources Board. (ARB) March 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Sacramento, CA. Available at: [\[http://arb.ca.gov/ch/handbook.pdf\]](http://arb.ca.gov/ch/handbook.pdf).
- California Air Resources Board (ARB). 2009. ARB Fact Sheet: Air Pollution and Health. December 2009. [\[http://www.arb.ca.gov/research/health/fs/fs1/fs1.htm\]](http://www.arb.ca.gov/research/health/fs/fs1/fs1.htm)
- California Department of Fish and Wildlife, California Natural Diversity Database (CNDDDB 2015a). July 2015. *Special Animals List*. Available at: [\[https://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPAnimals.pdf\]](https://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPAnimals.pdf)
- California Department of Fish and Wildlife, California Natural Diversity Database (CNDDDB 2015b). July 2015. *Special Vascular Plants, Bryophytes and Lichens List*. Available at: [\[https://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPPlants.pdf\]](https://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPPlants.pdf)
- City of Sacramento. October 2011. *Urban Water Management Plan*. Available at: [\[http://www.cityofsacramento.org/~media/Corporate/Files/DOU/Reports/2010UWMP.pdf\]](http://www.cityofsacramento.org/~media/Corporate/Files/DOU/Reports/2010UWMP.pdf)
- City of Sacramento. 2012 (February 14). *Sacramento Climate Action Plan*. Available at: [\[http://www.sacqp.org/cap.html\]](http://www.sacqp.org/cap.html).
- City of Sacramento, 2015 (2015a): *2035 General Plan*. Available at: [\[http://www.cityofsacramento.org/Community-Development/Resources/Online-Library/General%20Plan\]](http://www.cityofsacramento.org/Community-Development/Resources/Online-Library/General%20Plan).
- City of Sacramento, 2015 (2015 b): *Draft Master Environmental Impact Report for the City of Sacramento 2035 General Plan Update*. Available at: [\[http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports\]](http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports).
- City of Sacramento Traffic Engineering Division. 2015. *Traffic Counts Database*. Sacramento, CA. Available at: [\[http://www.cityofsacramento.org/Public-Works/Transportation/Traffic-Data-Maps/Traffic-Counts\]](http://www.cityofsacramento.org/Public-Works/Transportation/Traffic-Data-Maps/Traffic-Counts).
- County of Sacramento, 2008. *American River Parkway Plan*. Available at: [\[http://www.regionalparks.saccounty.net/Parks/Documents/Parks/ARPP06-021909_sm.pdf\]](http://www.regionalparks.saccounty.net/Parks/Documents/Parks/ARPP06-021909_sm.pdf)
- HELIX Environmental Planning, Inc. 2015. *Arborist Report* (included in this study). Sacramento, CA.
- HELIX Environmental Planning, Inc. 2015. Phase I Cultural Resources Assessment (included in this study). Sacramento, CA.

J.C. Brennan & Associates, Inc. 2014. *Environmental Noise Assessment – Advanced Health Care & Surgery Recovery Center*. August 25.

Sacramento Metropolitan Air Quality Management District. 2013. *Air Quality Standards Attainment Status*. Sacramento, CA. Available at:
[\[http://www.airquality.org/aqdata/attainmentstat.shtml\]](http://www.airquality.org/aqdata/attainmentstat.shtml).

Sacramento Metropolitan Air Quality Management District (SMAQMD) 2015. *CEQA Guide* December 2009, Revised December 2015. Available at:
[\[http://www.airquality.org/ceqa/ceqaguideupdate.shtml\]](http://www.airquality.org/ceqa/ceqaguideupdate.shtml).

Sacramento Metropolitan Air Quality Management District. (SMAQMD) January 2011. *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways*. Sacramento, CA. Available at:
[\[http://www.airquality.org/ceqa/RoadwayProtocol.shtml\]](http://www.airquality.org/ceqa/RoadwayProtocol.shtml).

Sacramento Metropolitan Air Quality Management District (SMAQMD) 2010. *Guide to Air Quality Assessment in Sacramento County*. Sacramento, CA. Available at:
[\[http://www.airquality.org/ceqa/cequguideupdate/TitlePageAndTOC.pdf\]](http://www.airquality.org/ceqa/cequguideupdate/TitlePageAndTOC.pdf)

Terracon Consultants, Inc. 2015. *Geotechnical Engineering Report: Assisted Living Center*. April 2015.