

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 Self Storage Project (P17-063): The proposed project includes a request for a tentative map to subdivide the 14.47-acre site into four parcels ranging in size from 2.52 to 4.56 acres. The application seeks development entitlements for a self-storage use on Parcel 4 (2.52 acres). The proposed project site is located at 500 Leisure Lane (APN 275-0260-070) within the city limits of the City of Sacramento.

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.

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), 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.

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

By: 

Dated: July 18, 2018



SACRAMENTO SELF-STORAGE [P17-063]

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 Self-Storage (P17-063)

Project Location: 500 Leisure Lane (APN 275-0260-070)

Project Applicant: Columbia Woodlake, LLC
1910 Fairview Avenue, Suite 200
Seattle, WA 98102

Project Planner: Garrett Norman, Associate Planner

Environmental Planner: Tom Buford, Principal Planner

Date Initial Study Completed: July 18, 2018

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 EIR 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 review the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the 2035 General Plan Master EIR (Master EIR or MEIR) to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)) and 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 Master EIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the Master EIR (CEQA Guidelines Section 15177(d)) Policies included in the 2035 General Plan that reduce significant impacts identified in the Master EIR are identified and discussed. See also the Master EIR for the 2035 General Plan. The mitigation monitoring plan for the 2035 General Plan, which provides references to applicable general plan policies that reduce the environmental effects of development that may occur consistent with the general plan, is included in the adopting resolution for the Master EIR. See City Council Resolution No. 2015-0060, beginning on page 60. The resolution is available at <http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports.aspx>.

This analysis incorporates by reference the general discussion portions of the 2035 General Plan Master EIR. (CEQA Guidelines Section 15150(a)). The Master EIR 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.aspx>

This Initial Study/Mitigated Negative Declaration is being circulated for public comment by a Notice of Availability/Notice of Intent to Adopt (NOA/NOI). The NOA/NOI should be consulted for dates of public comment. The NOA/NOI is available for review online at <http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports.aspx> and at the offices of the Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811.

Questions regarding the proposed project may be directed to the project planner: Garrett Norman, Associate Planner, (916) 808-7934, gnorman@cityofsacramento.org.

Questions regarding the environmental review process, including this document, may be directed to the environmental planner: Tom Buford, Principal Planner, (916) 799-1531, tbuford@cityofsacramento.org.

Please send written responses to:

Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811
Direct Line: (916) 799-1531
FAX (916) 808-1077
tbuford@cityofsacramento.org

SECTION II - PROJECT DESCRIPTION

INTRODUCTION

Columbia Woodlake LLC (Applicant) proposes to subdivide a 14.47-acre site southwest of the Leisure Lane/Exposition Boulevard intersection into four parcels and develop a 139,482 square foot (sf) self-storage facility on a 2.52-acre site on the resulting Parcel 4.

PROJECT LOCATION

The 14.47-acre site is located south of Highway 160 and Leisure Lane, east and north of Expo Parkway, and west of Exposition Boulevard in the City of Sacramento. The site is southwest of the Leisure Lane/Exposition Boulevard intersection. The site address is 500 Leisure Lane and the site consists of APN 275-0260-070. See Figure 1 and Figure 2.

SURROUNDING LAND USES

The site is in close proximity to the Johnston Business Park which includes various industrial and commercial businesses and Apria Health care facility, and a radiological facility to the southeast. Costco Wholesale store with an adjacent fueling station, REI, Quick Quack car wash and other commercial uses are southeast and east of the project site. A 99,487 square-foot assisted living and memory care facility with 113 resident suites is under construction on the 3.76-acre parcel immediately west of the site.

GENERAL PLAN AND ZONING

The site is designated as Suburban Center in the 2035 General Plan. The Suburban Center designation provides for predominantly nonresidential, lower-intensity single-use commercial development or horizontal and vertical mixed-use development that includes retail, service, office and/or residential uses. The density range is 15 to 36 units per acre and the floor area ratio ranges from 0.15 to 2.0.

The site is zoned General Commercial Labor Intensive Overlay (C-2-LI). Development in the Labor Intensive Overlay zone is subject to the requirements of the underlying C-2 zone, as prescribed in Sacramento City Planning and Development Code section 17.320.

The proposed self-storage use meets the definition of “mini-storage” in the Sacramento City Planning and Development Code, which describes the use as a facility that offers individually secured units or surface space for the storage of goods, other than hazardous materials, for rental to the public, each of which is accessible only by the renter of the individual unit or space. Regulation of this use varies, depending on distance from a light rail station. In the C-2-LI zone, mini-storage uses are conditionally permitted with a conditional use permit. The proposed use on Parcel 4 is consistent with the general plan and zoning designations, with the approval of a conditional use permit. The requested tentative map would be consistent with the Planning and Development Code and state law, as conditioned by the City.

PROPOSED ENTITLEMENTS

The proposed project includes the following entitlements:

- Conditional Use Permit for the storage use
- Site Plan and Design Review for the storage use
- Tentative Parcel Map to subdivide 14.47 acres into four parcels

SELF STORAGE USE

The proposed project consists of a 139,482 square foot (sf) self-storage facility in two buildings on the 2.52-acre Parcel 4 in the northeast portion of the site. Building 1 would consist of a three-story, 135,690 sf storage building and Building 2 would be a one-story 3,792 sf unconditioned storage building (**Table 1**).

TABLE 1: SELF STORAGE USE

	Building 1	Building 2
Building Size	135,690 sf	3,792 sf
Stories	3 story	1 story
Space	Conditioned space	Unconditioned space
Storage Units	Includes 12 units accessed externally	Total of 12 units, all accessed externally

Access to the site would be available from a driveway extending from Leisure Lane. The site would be landscaped and would include 18 parking spaces. The site has been designed so that buildings will relate and connect to uses on adjacent parcels when they are developed. The storage units accessible from the outside of the buildings (drive-up units) are located between the buildings to minimize aesthetic impacts. The height of the three-story building is 41'6" and the lot coverage is 46.7 percent.

DEVELOPMENT CONCEPT FOR OVERALL SITE

As outlined in **Table 2**, a Tentative Parcel Map is proposed to subdivide the 14.47-acre site into four parcels ranging in size from 2.52 to 4.56 acres. The proposed self-storage use is on Parcel 4. For purposes of environmental review, the applicant has identified a likely development scenario for the entire project site; the only development entitlement sought, however, relates to Parcel 4.

TABLE 2: DEVELOPMENT CONCEPT

Parcel	Acreage	Uses
1	4.56 acres	See description below regarding potential development scenario.
2	4.55 acres	
3	2.84 acres	
4	2.52 acres	139,482 sf self-storage use
	14.47 acres	

Although a range of uses is permitted in the C-2LI zone, the Applicant's vision for the site is to develop the parcels with the following mix of retail, residential and/or hotel uses listed below:

- Senior Apartments (three-story building, approximately 150-170 units, 150,000± sf)
- Hotel (100-120 room, 4-5 story, 70-80,000± sf)
- Retail (single-story, 50,000± sf, 0.4 – 0.5 FAR)
- Self-Storage (139,482 sf, 1.28 FAR) (Parcel 4)

The types of uses envisioned for the site are significantly less intense than the maximum intensity permitted for the site under 2035 General Plan and zoning development standards. For instance, under general plan development standards, a maximum of 257,004 square feet of retail uses could be constructed on Parcels 1, 2 and 3, assuming buildout at the maximum floor area ratio (FAR) of 2.0 (**Table 3**).

While the Applicant has identified a development scenario for the entire 14.47-acre site for the purposes of this initial study, the development that actually occurs in the future cannot be identified with certainty. In the event future development is proposed for Parcels 1, 2 and 3, the City would consider whether additional review is required under the California Environmental Quality Act. This review would consider

whether the subsequent proposal is consistent with the scenario identified in this document, and whether new information regarding the circumstances of development could result in identifying new significant effects, new mitigation measures, or other information requiring additional review. See CEQA Guidelines Section 15162.

TABLE 3: DEVELOPMENT SCENARIOS FOR PARCELS 1, 2 AND 3 (11.75 ACRES)

	Under General Plan Development Standards	Proposed Development Concept
Uses	257,000 sf of Commercial Uses	Senior Apartments (150-170 units, 150,000± square feet)
		Hotel (120 rooms, 4-5 story, 70-80,000 sf),
		Retail (single-story, 50,000 sf, 0.4 – 0.5 FAR)
Floor Area Ratio	2.0 (maximum)	Variable

The maximum FAR of 2.0 permitted under the 2035 General Plan land use designation of Suburban Center is, as a practical matter, unachievable on the project site because vertical mixed use and multi-story retail uses are not proposed. In addition, the land area required to accommodate parking, landscaping, stormwater management and other improvements will further reduce the FAR. The estimated floor area ratio of between 0.4 and 0.8 for the project site is a more reasonable assumption for the type of retail uses envisioned. This is consistent with general plan requirements and has been used as the basis for review in this document.

Access for the parcels would be provided from existing and proposed driveways to Leisure Lane and Expo Parkway and would be shared among uses on the site, as shown in **Figure 1**.

This initial study evaluates the land uses described above, including the self-storage use and the uses envisioned on the other parcels. If, in the future, uses other than those described above are proposed, additional environmental or traffic analyses may be required.

FIGURES (APPENDIX A)

Figure 1 – Vicinity Map

Figure 2 – Project Location

Figure 3 – Land Use Map

Figure 4 - Zoning Map

Figure 5 - Site Plan

SECTION III – ENVIRONMENTAL CHECKLIST AND DISCUSSION

LAND USE, POPULATION AND HOUSING, AGRICULTURAL RESOURCES, ENERGY

Introduction

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

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

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

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

Discussion

GENERAL PLAN LAND USE CONSISTENCY

The project site has been designated as Suburban Center in the 2035 General Plan¹. The project site is located in an urbanized portion of the community. State Route 160 is located 100± feet north of the site and Expo Parkway abuts the property to the south. Business, commercial, and residential development surround the property to the east, south and west. The property was previously developed as the Red Lion Woodlake Hotel and Conference Center, which included 306 guest rooms and 50,000 square feet of conference facilities. In 2017, buildings on the site were demolished. Development of the site as proposed would alter the existing landscape, but the project site has been designated for urban development in the 2035 General Plan and the Planning and Development Code, and the proposed development is consistent with these planning designations².

ZONING CONSISTENCY

The project site is zoned General Commercial Labor Intensive Overlay (C-2-LI). The purpose of the C-2 zoning is to provide for the sale of goods, the performance of services, including repair facilities, office uses, dwellings, small wholesale stores or distributors, and limited processing and packaging. The zoning code requires transitional height limits when buildings on C-2 zoned properties are within specified distances of the R-1, R-1B, and R-2 zones: buildings, or portions of buildings, in a C-2 zone within 40-79 feet of an R-1 zone are subject to a height limit of 55 feet. The proposed project site is outside the area subject to this limitation. Zone districts in the vicinity of the project site include additional parcels with the

¹ City of Sacramento, 2015: 2035 General Plan Update.

² City of Sacramento, 2015. City of Sacramento 2035 General Plan Update Master Environmental Impact Report. Certified March 3, 2015.

C-2 designation, which includes the Costco wholesale, Apria Healthcare and REI parcels; a M-1 zoned parcel, the Johnston Business Park, and a parcel to the southwest zoned for a hospital.

The proposed project would develop storage, retail, senior living, and hotel uses, which are all permitted uses within the C-2 zone. The project would meet height, setback and other applicable development standards.

The project site is surrounded by existing development. The site was previously occupied by the Red Lion Woodlake Hotel and Conference Center which was demolished in 2017. Implementation of the proposed project would not physically divide an established community. The proposed project site is not included as part of any habitat conservation plan or natural community conservation plan. Implementation of the project would not result in any inconsistency between the proposed project and applicable general plans and regional plans.

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 effects³ (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, and light industrial 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, senior housing to current residents, and short-term occupancy units at the hotel. The project is consistent with the 2035 General Plan land use designation (Suburban Center), and would not require any change to the current zoning (C-2-LI). There are no existing houses on the project site; therefore, people and housing units would not be displaced as a result of project construction and implementation. Impacts due to the development of proposed project related to population and housing would be **less than significant**.

AGRICULTURAL RESOURCES

The Master EIR discussed the potential impact of development under the 2035 General Plan on agricultural resources. See Master EIR, Chapter 4.1. In addition to evaluating the effect of the general plan on sites within the City, the Master EIR concluded 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. The Master EIR 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)⁴. The site is not zoned for agricultural uses, and there are no Williamson Act contracts that affect the project site. No existing agricultural or timber-harvest uses are located on or in the vicinity of the project site. Development of the site would result in **no impacts** to agricultural resources.

³ City of Sacramento. 2014: *Sacramento 2035 General Plan Master Environmental Impact Report*. Chapter 4.

⁴ California Department of Conservation, Division of Land Resource Protection. 2014. Sacramento County Important Farmland Map. Available: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sac14.pdf>. Accessed: May 8, 2018.

ENERGY

Structures built would be subject to Titles 20 and 24 of the California Code of Regulations, which reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. The 2035 General Plan includes policies (see 2035 General Plan Energy Resources Goal U 6.1) that encourage energy-efficient technology by offering rebates and other incentives to commercial and residential developers, coordination with local utility providers, and recruitment of businesses that research and promote energy conservation and efficiency.

The Master EIR discussed energy conservation and relevant 2035 General Plan policies in section 6.3. The discussion concluded that with implementation of the 2035 General Plan policies and energy regulation (e.g., Title 24), development anticipated in the 2035 General Plan would not result in the inefficient, wasteful or unnecessary consumption of energy.

The proposed project would comply with Building Energy Efficiency Standards included in Title 24 of the California Code of Regulations which require new residential and nonresidential development to incorporate energy efficiency standards into project designs. The proposed project would implement general plan policies and energy regulation including Title 24 requirements; thus, the proposed project would not result in any additional energy impacts and would be **less than significant**.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
1. AESTHETICS Would the proposal:			
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 within an urbanized area of Sacramento. Surrounding uses include the Johnston Business Park to the west, 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), and Costco and other retail stores to the south and southwest. Further to the south (1,000± feet) is the American River Parkway. State Route 160 is located 100± feet north of the site.

The project site is completely graded with sparse vegetation. 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, is in close proximity to the project site (approximately 0.2 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 highway⁵. 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 interfere with an important scenic resource or substantially degrade the view of an existing scenic resource; or
- Create a new source of substantial light or glare that is substantially greater than typical urban sources and could cause sustained annoyance or hazard for nearby sensitive receptors.

⁵ California Department of Transportation (Caltrans), 2011. Map of Officially Designated Scenic Highways in Sacramento County. Available: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed April 20, 2018.

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR described the existing visual conditions in the City of Sacramento general plan, and the potential changes to those conditions that could result from development consistent with the 2035 General Plan. See Master EIR, Chapter 4.13, Visual Resources.

The Master EIR identified potential impacts for light and glare (Impact 4.13-1) and concluded that impacts would be less than significant.

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. 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 not affect residential land uses.

The lighting for site uses would be designed and constructed within the guidelines provided by the 2035 General Plan and the American River Parkway Plan⁶. 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 several multi-story structures 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. Thus, the proposed project would not utilize building materials that would create substantial glare effects that would be considered hazardous or annoying and this impact would be considered **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 completely graded with occasional landscaped plants and no significant scenic resources. Redevelopment of the project site would change views of the project site from a vacant graded lot to a developed mixed-use development.

While the proposed project would result in a change in visual character on the site, the proposed redevelopment would be consistent with the mixed-use, residential character of the neighborhood. The proposed use on Parcel 4 would be subject to the site plan and design review process, which provides City authority over design of the site and would ensure that design of structures on the site would be visually compatible with existing development in the vicinity of the project site. Therefore, impacts to the visual character of the property site would be less than significant and potentially beneficial. Further, because the proposed project is consistent with the 2035 General Plan, impacts have been analyzed and anticipated in the MEIR. The proposed project would not result in potential impacts in addition to or greater than the impacts already identified in the MEIR. A **less than significant impact** would occur.

Mitigation Measures

None

⁶ Sacramento County, 2008. *American River Parkway Plan*.

Findings

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

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
2. AIR QUALITY			
<i>Would the proposal:</i>			
A) Result in construction emissions of NO _x above 85 pounds per day?			X
B) Result in operational emissions of NO _x or ROG above 65 pounds per day?			X
C) Violate any air quality standard or have a cumulatively considerable contribution to an existing or projected air quality violation?			X
D) Result in PM ₁₀ and PM _{2.5} concentrations that exceed SAMQMD requirements?			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

Data Sources/Methodology

The air quality analysis presented in this section is based upon the following technical information:

- CalEEMod output modeling files as prepared by HELIX Environmental Planning; and,
- Climate Action Plan (CAP) Consistency Review Checklist (**Appendix B**).

Environmental Setting

The project site is located in the City of Sacramento within the Sacramento Valley Air Basin (SVAB). The terrain in the valley is flat and approximately 25 feet above sea level. Hot, dry summers and mild, rainy winters characterize the Mediterranean climate of the SVAB. The SVAB is bound by the North Coast Mountain Ranges to the west and the Northern Sierra Nevada Mountains to the east. The surrounding mountains create a barrier to airflow, which can trap air pollutants in the valley, lending favorable conditions for air stagnation and temperature inversions.

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for implementing emissions standards and other requirements of federal and state laws in the SVAB. As required by the California Clean Air Act (CCAA), SMAQMD has published various air quality planning documents as discussed below to address requirements to bring the District into compliance with the federal and state ambient air quality standards. The Air Quality Attainment Plans are incorporated into the State Implementation Plan, which is subsequently submitted to the U.S. Environmental Protection Agency (EPA), the federal agency that administrates the Federal Clean Air Act (CAA) of 1970, as amended in 1990.

Ambient air quality is described in terms of compliance with state and national standards, and the levels of air pollutant concentrations considered safe, to protect the public health and welfare. These standards are designed to protect people most sensitive to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. The EPA has established national ambient air quality standards (NAAQS) for six air pollution constituents. As permitted by the CAA, California has adopted more stringent air emissions standards (CAAQS) and expanded the number of regulated air constituents.

The California Air Resources Board (CARB) is required to designate areas of the state as attainment, nonattainment, or unclassified for any state standard. An “attainment” designation for an area signifies that pollutant concentrations do not violate the standard for that pollutant in that area. A “nonattainment” designation indicates that a pollutant concentration violated the standard at least once. The air quality attainment status of the SVAB, including the City of Sacramento, is shown in **Table 4**.

TABLE 4. SACRAMENTO VALLEY AIR BASIN – ATTAINMENT STATUS

POLLUTANT	STATE OF CALIFORNIA ATTAINMENT STATUS	FEDERAL ATTAINMENT STATUS
Ozone	Nonattainment	Nonattainment
Suspended Particulate Matter (PM ₁₀)	Nonattainment	Attainment
Fine Particulate Matter (PM _{2.5})	Attainment	Nonattainment
Carbon Monoxide	Attainment	Attainment/Unclassified
Nitrogen Dioxide	Attainment	Attainment/Unclassified
Lead	Attainment	Attainment/Unclassified
Sulfur Dioxide	Attainment	Unclassified
Sulfates	Attainment	No Federal Standard
Hydrogen Sulfide	Unclassified	No Federal Standard
Visibility Reducing Particles	Unclassified	No Federal Standard

Source: CARB 2018

The Sacramento County/Sacramento Metropolitan Area portion of the SVAB is currently in nonattainment for federal and/or state ozone (O₃), Suspended Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5}) standards. Concentrations of all other pollutants meet state and federal standards.

Ozone is not emitted directly into the environment but is generated from complex chemical reactions between Reactive Organic Gasses (ROG), or non-methane hydrocarbons, and Oxides of Nitrogen (NO_x) that occur in the presence of sunlight. ROG and NO_x generators in the County include motor vehicles, recreational boats, other transportation sources, and industrial processes. PM₁₀ and PM_{2.5} arise from a variety of sources, including road dust, diesel exhaust, fuel combustion, tire and brake wear, construction operations and windblown dust.

The SMAQMD seeks to attain and maintain 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 CAA, its amendments, and the CCAA.

All construction projects are required to implement the SMAQMD's Basic Construction Emission Control Practices (Rule 403). The following Best Management Practices (BMP) are considered feasible for controlling fugitive dust from a construction site:

Fugitive Dust Control Practices (District Rule 403).

- 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 track out 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.

Diesel Emissions Control Practices. 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 CARB 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.

Construction Equipment Maintenance Programs. 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.

PROJECT DESIGN FEATURES

Construction

Construction of the proposed project would include a 139,482-square foot self-storage facility; an approximately 170-unit senior apartment building; an 80,000-square foot, five-story, 120-room hotel; and a 50,000-square foot single-story retail building. Construction of the proposed land uses would commence as early as late 2018. For a conservative analysis, this document assumes that the self-storage, residential, retail and hotel land uses would be constructed concurrently, even though the only development entitlement in process relates to Parcel 4.

Construction design features include: water exposed areas twice per day; provide 12 percent moisture content to unpaved roads; limit vehicle speeds to 15 miles per hour; and use of low VOC paint during architectural coating. Additionally, the following BMPs, described above, would be applied to the project: Fugitive Dust Control Practices (District Rule 403); Diesel Emissions Control Practices; and Construction Equipment Maintenance Programs.

Operation

Operational design features of the proposed project include:

- **Area** – The project would use low VOC coating during operation of the project.
- **Energy** – The project would exceed Title 24 energy efficiency by 10 percent for residential land uses and by 5 percent for commercial land uses. Measures to increase energy efficiency may include, but are not limited to: increased wall insulation, smart meters, above-standard ventilation systems or energy efficiency lighting fixtures; enrollment in Sacramento Metropolitan Utility District's Green Energy (Greenenergy) or other program achieving programmatic reductions in GHG emissions; and purchase of energy efficiency credits or other program achieving programmatic improvements in building efficiency.
- **Mobile** – The Project would be built in such a way as to include features that work to minimize vehicle miles traveled (VMT). This includes the following measure as described in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures*:
 - *LUT-3 Increase Diversity of Urban and Suburban Developments (Mixed Use)* – Having different types of land uses near one another can decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transport.
 - *LUT-9 Improve Design of Development* – improving walkability design increases the potential for pedestrians to walk and bike to these destinations and therefore reduces the VMT.
- **Water and Waste** – The project would provide 20 percent water reduction per California Green Building Standards Code and 75 percent waste reduction per Assembly Bill (AB) 341.

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 2035 General Plan policies:

- Construction emissions of NOx above 85 pounds per day;
- Operational emissions of NOx or ROG above 65 pounds per day;
- Violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- Any increase in PM10 concentrations, unless all feasible Best Available Control Technology (BACT) and Best Management Practices (BMPs) have been applied, then increases above 80 pounds per day or 14.6 tons per year;
- 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 Master EIR and Applicable General Plan Policies

The Master EIR 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 Master EIR, Chapter 4.2.

Policies in the 2035 General Plan in Environmental Resources were identified as mitigating potential effects of development that could occur under the 2035 General Plan. For example, Policy ER 6.1.1 calls for the City to work with the California Air Resources Board and the Sacramento Metropolitan Air Quality Management District (SMAQMD) to meet state and federal air quality standards; Policy ER 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 ER 6.1.4 and ER 6.1.11 calls for coordination of City efforts with SMAQMD; and Policy ER 6.1.15 requires the City to give preference to contractors using reduced-emission equipment.

The Master EIR identified exposure to sources of toxic air contaminants (TAC) as a potential effect. Policies in the 2035 General Plan would reduce the effect to a less-than-significant level. The policies include ER 6.1.4, requiring coordination with SMAQMD in evaluating exposure of sensitive receptors to TACs, and impose appropriate conditions on projects to protect public health and safety; as well as Policy LU 2.7.5 requiring extensive landscaping and trees along freeways fronting elevation and design elements that provide proper filtering, ventilation, and exhaust of vehicle air emissions from buildings.

The Master EIR found that greenhouse gas emissions that would be generated by development consistent with the 2035 General Plan would contribute to climate change on a cumulative basis. Policies of the general plan identified in the Master EIR that would reduce construction related GHG emissions include: ER 6.1.2, ER 6.1.11 requiring coordination with SMAQMD to ensure feasible mitigation measures are incorporated to reduce GHG emissions, and ER 6.1.15. The 2035 General Plan incorporates the GHG reduction strategy of the 2012 Climate Action Plan (CAP), which demonstrates compliance mechanism for achieving the City's adopted GHG reduction target of 15 percent below 2005 emissions by 2020. Policy ER 6.1.8 commits the City to assess and monitor performance of GHG emission reduction efforts beyond 2020, and progress toward meeting long-term GHG emission reduction goals, ER 6.1.9 also commits the City to evaluate the feasibility and effectiveness of new GHG emissions reduction measures in view of the City's longer-term GHG emission reductions goal. The discussion of greenhouse gas emissions and climate change in the 2035 General Plan Master EIR are incorporated by reference in this Initial Study (CEQA Guidelines Section 15150).

The Master EIR identified numerous policies included in the 2035 General Plan that addressed greenhouse gas emissions and climate change. See Draft Master EIR, Chapter 4.14, and pages 4.14-1 et seq. The Master EIR is available for review at the offices of Development Services Department, 300 Richards Boulevard, 3rd Floor, Sacramento, CA during normal business hours, and is also available online at

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

Answers to Checklist Questions

Question A

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 would exceed the SMAQMD's construction significance threshold for NO_x. The project includes buildings greater than 4 stories tall the NO_x construction screening level is not recommended for use. As such, the California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to quantify project-generated construction emissions. The analysis methodology, assumptions, and CalEEMod output are provided in **Appendix B**.

NO_x emissions would be generated by on-site heavy equipment and truck activity associated with hauling materials, off-road construction equipment, and worker vehicle trips. As shown in **Table 5**, 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 5: ESTIMATED PROJECT CONSTRUCTION NO_x EMISSIONS

Construction Year	NO _x (lbs/day)
2018	60
2019	55
2020	29
2021	13
SMAQMD Threshold	85
<i>Significant Impact?</i>	<i>No</i>

Source: CalEEMod output files as contained in Appendix B.

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 project proposes multiple land use types, and as such, the operational screening levels is not recommended for use. Therefore, CalEEMod version 2016.3.2 was used to quantify project-generated operational emissions. Mobile emissions were based on trip generation provided in the Traffic Impact Study (TIS) and were quantified for each proposed land use⁷. Operational emission sources, as depicted in **Table 6**, include area, on-site energy use, and transportation.

TABLE 6: ESTIMATED PROJECT OPERATION NO_x AND ROG EMISSIONS

Operational Source	NO _x (lbs/day)	ROG (lbs/day)
Area	<0.5	13
Energy	2	<0.5
Mobile	26	6
TOTAL	28	19
SMAQMD Threshold	65	65
<i>Significant Impact?</i>	<i>No</i>	<i>No</i>

Source: CalEEMod output files as contained in Appendix B.

Note: Totals may not sum exactly due to rounding

Operational ROG and NO_x emissions would remain below SMAQMD thresholds during operation of the proposed project. Therefore, the proposed project would generate less than significant quantities of operational ROG and NO_x, and project-would result in a **less than significant** impact.

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.

⁷ Kimley-Horn: Planning and Design Engineering Consultants. 2018. *Sacramento Self Storage Traffic Impact Study*. Sacramento, CA.

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 a building that exceeds four stories, the PM₁₀ and PM_{2.5} construction screening level is not recommended for use. As such, CalEEMod version 2016.3.2 was used to quantify project-generated construction emissions. The analysis methodology, assumptions, and CalEEMod output are provided in **Appendix B**.

Emissions of PM₁₀ and PM_{2.5} would be generated by minimal grading activity and use of off-road construction equipment. The maximum daily emissions of PM₁₀ and PM_{2.5} are analyzed below. As shown in **Table 7**, 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 7: ESTIMATED PROJECT PM₁₀ AND PM_{2.5} EMISSIONS

Construction Year	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
2018	7	4
2019	6	4
2020	4	2
2021	1	1
SMAQMD Threshold	80	82
<i>Significant Impact?</i>	<i>No</i>	<i>No</i>

Source: CalEEMod output files as contained in Appendix B.

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 would 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 the TIS prepared for the project, the increase in daily trips associated with daily operation of the project would be 4,546 daily trips; with 247 AM peak hour trips and 287 PM peak hour trips (Kimley-Horn 2018). The TIS evaluated the following six intersections: Leisure Lane/Slobe Avenue at Canterbury Road/Expo Parkway; Leisure Lane at Exposition Boulevard/State Route-160 Eastbound Ramps; Leisure Lane at Project Driveway #1 and #2 for Existing Plus Project Conditions Only; and Expo Parkway at Project Driveway #3 and #4 for Existing Plus Project Conditions Only. The six intersections would operate between LOS A and LOS C with the addition of proposed project traffic. Thus, the project would neither cause new severe congestion nor significantly worsen existing congestion. There would have no potential for a CO hotspot or exposure of sensitive receptors to substantial, project-generated, local CO emissions. The 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

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 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 9-, 30-, or 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the proposed project.

As presented in **Table 7** above, 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, especially when compared to typical exposure periods. 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**.

Operation

The proposed project would involve the development of a self-storage building, senior living apartments, a hotel, and a retail building; project operation would not introduce any new stationary sources of TACs. In addition, the project would not result in a significant increase in 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

Environmental Setting

GHGs, as defined under California's AB 32, include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF₆). AB 32, the California Global Warming Solutions Act of 2006, recognizes that California is a source of substantial amounts of GHG emissions. The statute states that:

Global warming poses a serious threat to the economic wellbeing, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

In order to help avert these potential consequences, AB 32 established a State goal of reducing GHG emissions to 1990 levels by the year 2020, which is a reduction of approximately 16 percent from forecasted emission levels, with further reductions to follow. In addition, AB 32 required CARB develop a Scoping Plan to help the state achieve the targeted GHG reductions. In 2015, Executive Order (EO) B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28 nation European Union. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in AB 32. As a follow-up to AB 32 and in response to EO-B-30-15, Senate Bill (SB) 32 was passed by the California legislature in 2016 to codify the EO's California GHG emission reduction target of 40 percent below 1990 levels by 2030. The most recent update to the Scoping Plan was adopted in December 2017 and establishes a proposed framework for California to meet the EO-B-30-15 reduction target⁸.

City Climate Action Plan Policies and Programs

As a part of the 2035 General Plan Update, the City of Sacramento identified policies relating to climate change that are to be considered and implemented with future planning.⁹ The proposed project will actualize numerous policies listed in Appendix B of the 2035 General Plan. The proposed project will implement goal LU 1.1.5, which calls for infill development to in existing urbanized areas. The project will provide mixed use development within an urban corridor on a previously developed site. Goal LU 4.4.6 promotes development with a mix of uses. The proposed project will implement mixed use development with potential for short term residential, retail, and senior living. LU 5.4.3 calls for projects to provide connectivity, the proposed project will implement circulation that will aid in the pedestrian connectivity in the surrounding area. The proposed project will conform to Sacramento's Climate Action Plan, as outlined in the discussion below.

City Climate Action Plan

In 2012, the City of Sacramento adopted a community wide Climate Action Plan (CAP). The CAP outlines multiple initiatives intended to help the City achieve its overall goals of reducing community-wide emissions by 15 percent below 2005 levels by 2020, 38 percent below 2005 levels by 2030, and 83 percent below 2005 levels by 2050. Included in the CAP are a comprehensive set of strategies, measures

⁸ California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. November 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

⁹ City of Sacramento. 2015. Appendix B: General Plan Climate Action Plan Policies and Programs of the 2035 General Plan Update

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

The City has developed a CAP Consistency Review Checklist (**Appendix B**) for use in determining the consistency of proposed projects with the CAP. The Checklist includes six criteria that a project must be evaluated against. The Checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emission targets identified in the CAP are achieved. Implementation of the measures would ensure that new development is consistent with CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with each of the six criteria are considered consistent with Sacramento's CAP and would not have a significant GHG impact. The following discussion evaluates the proposed project for each of these six criteria.

Cap Checklist

The project was evaluated for consistency with the CAP. Under the six criteria, the project demonstrated consistency with the CAP through the Checklist (**Appendix B**). Therefore, the project would be consistent with the City's General Plan growth potential and CAP and would have a less than significant impact on GHG emissions. The six criteria and project specific responses are listed below.

1. *Is the proposed project substantially consistent with the City's over-all goals for land use and urban form, allowable floor area ratio (FAR) and/or density standards in the City's 2035 General Plan?*

Yes. 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).

2. *Would the proposed project include traffic-calming measures?*

Not Applicable. The proposed project does not include any roadway or facility improvements, traffic calming measures do not apply.

3. *Would the proposed project incorporate pedestrian facilities and connections to public transportation consistent with the City's Pedestrian Master Plan?*

Yes. 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.

4. *Would the proposed project incorporate bicycle facilities consistent with the City's Bikeway Master Plan, and meet or exceed minimum standards for bicycle facilities in the Zoning Code and CALGreen?*

Yes. The project would comply with the City development standards and regulations, which address hazards or barriers for pedestrian or bicycle access.

5. *For residential projects of 10 or more units, commercial projects greater than 25,000 square feet, or industrial projects greater than 100,000 square feet, would the project include on-site renewable energy systems (e.g., photovoltaic systems) that would generate at least a minimum of 15% of the project's total energy demand on-site?*

No. Prior to issuance of building permits, the applicant shall comply with the alternative Climate Action Plan requirement to exceed the minimum energy efficiency standards under California Administrative Code Title 24 by 5 percent for commercial land uses. Measures to increase the energy efficiency of the project buildings shall include, but are not limited to:

- Increased wall insulation, smart meters, above-standard ventilation systems or energy efficiency lighting fixtures;
- Enrollment in Greenergy (SMUD) or other program achieving programmatic reductions in greenhouse gas emissions;
- Purchase of energy efficient credits (SMAQMD) or other program achieving programmatic improvements in building efficiency.

The applicant shall submit energy calculations with building plans and certification of any required professional to demonstrate compliance with this condition, including specific reference to the percentage improvements required under the Climate Action Plan.

6. *Would the project (if constructed on or after January 1, 2014) comply with minimum CALGreen Tier I water efficiency standards?*

Yes. The project shall comply with the adopted CAP by meeting the Tier 1 Voluntary Standards for Health Facilities (OSHPD 1, 2 & 4) in the 2013 California Green Building Standards Code (CALGreen).

Mitigation Measures

None

Findings

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

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

DATA SOURCES/METHODOLOGY

Biological resources within the project site were identified and characterized based on literature review and database searches. The primary sources of data referenced for this section include the following:

- City of Sacramento 2035 General Plan Update Draft Master EIR.
- CNDDDB record search within 10 mile radius of the project site¹⁰ (**Appendix C**)
- Aerial Imagery, including Google Earth;
- Special Vascular Plants, Bryophytes, and Lichens List¹¹;
- Special Animal List.¹²

Environmental Setting

Regional Setting

The project site is located within the City of Sacramento. The regional setting is mainly urban with the Sacramento River corridor supporting riparian woodlands composed of cottonwood, willow, sycamore, and valley oak. Agricultural and grassland areas dominate the unincorporated areas of Sacramento County. Native habitats are located primarily outside the city boundaries, but also occur along river and stream corridors and on several 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.

¹⁰ The California Natural Diversity Database (CNDDDB). 2015. CNDDDB Records Search for Sacramento Senior Living. Data from 2015.

¹¹ California Department of Fish and Wildlife (CDFW). 2017. Natural Diversity Database. Special Vascular Plants, Bryophytes, and Lichens List. Quarterly publication. 126 pp. Data from July 2017.

¹² California Department of Fish and Wildlife (CDFW). 2017. Natural Diversity Database. Special Animals List. Periodic publication. 51 pp. Data from July 2017.

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 and residential development with some open spaces nearby that attract non-native and very common wildlife species. The site is approximately 0.15 miles from the Sacramento River. The Sacramento River contains stretches of riparian habitat and woodlands that serve as important wildlife habitat and migratory corridors for a variety of native species. Some species, like raptors, could utilize urban habitat for nesting and forage along the river corridor. Therefore, while the site itself is urban in nature, its proximity to the Sacramento River allows for the potential for use by native and sensitive species. Most natural habitats have been removed through industrial, commercial, and residential development.

Habitat immediately adjacent to the project site mainly consists of highly disturbed non-native annual grasslands. Onsite, the majority of landcover is annual grasslands. Landscaped trees are present along the eastern property line, the remainder of the site is devoid of vegetation other than annual grasses.. Construction activities will not alter the few trees that are on site. 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. The proposed project will not remove habitat and any potential impacts relating to biological resources would be restricted to construction periods and are properly mitigated.

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.

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.

Sensitive Biological Resources

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 (**Appendix C**). 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.)

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*, *legenera*, Bogg's Lake hedge-hyssop, wooly rose-mallow, Suisun marsh aster, and Sanford's arrowhead. Because the site does not encompass the required wetland habitats necessary for these species to exist, they have been eliminated from further evaluation. Three special-status species that are known to grow in dryer habitats and include: Ferris' milk-vetch, northern California black walnut and stinkbells. 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 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 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
- Tricolored blackbird
- Golden eagle
- Burrowing owl
- Ferruginous hawk
- Merlin
- Purple martin
- Bank swallow
- Song sparrow (Modesto population)
- Least Bell's vireo
- Great egret
- Great blue heron
- Sacramento perch
- American badger
- Western pond turtle
- Giant garter snake
- 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.

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; or
- Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands).

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 (or formally proposed for, or candidates for, listing);
- Listed as endangered or threatened under the California Endangered Species Act (or proposed for listing);
- Designated as endangered or rare, pursuant to California Fish and Game Code (Section 1901);
- Designated as fully protected, pursuant to California Fish and Game Code (Section 3511, 4700, or 5050);
- Designated as species of concern by U.S. Fish and Wildlife Service (USFWS), or as species of special concern to California Department of Fish and Game (CDFG);
- Plants or animals that meet the definition of rare or endangered under the California Environmental Quality Act (CEQA).

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.3 of the Master EIR evaluated the effects of the 2035 General Plan on biological resources within the City. The Master EIR 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 ER 2.1.5 calls for the City to preserve the ecological integrity of creek corridors and other riparian resources; Policy ER 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 ER 2.1.11 requires the City to coordinate its actions with those of the California Department Fish and Wildlife, U.S. Fish and Wildlife Service, and other agencies in the protection of resources.

The Master EIR discussed biological resources in Chapter 4.3. The Master EIR concluded that policies in the general plan, combined with compliance with the California Endangered Species Act, Natomas Basin HCP (when applicable) and CEQA would minimize the impacts on special-status species to a less-than-significant level (see Impact 4.3-1), and that the general plan policies, along with similar compliance with local, state and federal regulation would reduce impacts to a less-than-significant level for habitat for special-status invertebrates, birds, amphibians and reptiles, mammals and fish (Impacts 4.3-3-6).

Given the prevalence of rivers and streams in the incorporated area, impacts to riparian habitat is a common concern. Riparian habitats are known to exist throughout the City, especially along the Sacramento and American rivers and their tributaries. The Master EIR discussed impacts of development adjacent to riparian habitat that could disturb wildlife species that rely on these areas for shelter and food and could also result in the degradation of these areas through the introduction of feral animals and contaminants that are typical of urban uses. The California Department of Fish and Wildlife (CDFW) regulates potential impacts on lakes, streams, and associated riparian (streamside or lakeside) vegetation through the issuance of Lake or Streambed Alteration Agreements (SAA) (per Fish and Game Code Section 1602), and provides guidance to the City as a resource agency. While there are no federal regulations that specifically mandate the protection of riparian vegetation, federal regulations set forth in Section 404 of the Clean Water Act address areas that potentially contain riparian-type vegetation, such as wetlands.

The general plan calls for the City to preserve the ecological integrity of creek corridors, canals and drainage ditches that support riparian resources (Policy ER 2.1.5) and wetlands (Policy ER 2.1.6) and requires habitat assessments and impact compensation for projects (Policy ER 2.1.10). has adopted a standard that requires coordination with state and federal agencies if a project has the potential to affect other species of special concern or habitats (including regulatory waters and wetlands) protected by agencies or natural resource organizations (Policy 2.1.11).

Implementation of 2035 General Plan Policy ER 2.1.5 would reduce the magnitude of potential impacts by requiring a 1:1 replacement of riparian habitat lost to development. While this would help mitigate impacts on riparian habitat, large open areas of riparian habitat used by wildlife could be lost and/or degraded directly and indirectly through development under the 2035 General Plan. Given the extent of urban development designated in the general plan, the preservation and/or restoration of riparian habitat would likely occur outside of the City limits. The Master EIR concluded that the permanent loss of riparian habitat would be a less-than-significant impact. (Impact 4.3-7)

Answers to Checklist Questions

Question A

The site does not contain known hazardous materials, therefore site preparation activities associated with the project, including excavating, grading, and trenching, are not likely to disturb contaminated soil that may contain hazardous substances that could cause injury or death to special-status species. Please refer to the Hazards section of this Initial Study regarding the risk of an accidental release of hazardous substances that could adversely affect special-status species. Since there are no known hazardous materials onsite, a less than significant impact from hazardous materials on special-status species.

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 have previously been found approximately 0.5 miles south along the

American River. The proposed project would not result in the removal of any trees on site.

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.

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 B

The project site provides limited value to threatened and endangered wildlife species because it was previously graded and contains little vegetation. The development of the site would not eliminate 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 database reviews to be on site. It is unlikely that any threatened or endangered plants would be found at the site due to the urban, disturbed nature and lack of natural habitats at the site. Therefore, construction and operation of the project would have a **less than significant impact** on special-status plants.

Question C

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

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

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

Ground disturbances associated with construction of the project site could result in direct destruction of bird nests protected under the Migratory Bird Treaty Act and CDFW 3503.5 code. Project construction noise could also result in disturbance of raptors and migratory birds causing nest abandonment by the adults and mortality of chicks and eggs. Thus, negatively affect breeding or reproduction of species on or adjacent to the project site. The loss of some nests of common migratory bird species (e.g., mourning dove, American robin, and scrub jay) would not be considered a substantial impact, because it would not result in a substantial effect on their populations locally or regionally. However, the destruction of any migratory bird nest is a violation of the Migratory Bird Treaty Act and would be considered a **significant** impact. 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:

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).

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

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
3. <u>CULTURAL RESOURCES</u>			
Would the project:			
A) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?		X	
B) Cause a substantial adverse change in the significance of an archaeological resource as defined in § 15064.5?		X	
C) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X	
D) Disturb any human remains, including those interred outside of formal cemeteries?		X	
E) Adversely affect tribal cultural resources?		X	

Data Sources/Methodology

Cultural resources within the project site were identified and characterized based on literature review and database searches. The primary sources of data referenced for this section include the following:

- City of Sacramento 2035 General Plan Update Draft Master EIR (MEIR)
- NCIC Records Search (Conducted in 2015 for separate project on the subject property)¹³ (**Appendix D**)
- Phase I Cultural Resource Assessment¹⁴ (Conducted in 2015 for separate project on the subject property) (**Appendix D**)
- Aerial Imagery, including Google Earth.

Environmental Setting

The City of Sacramento and the surrounding area are known to have been occupied by Native American groups for thousands of years prior to settlement by non-Native peoples. Archaeological materials, including human burials, have been found throughout the city. Human burials outside of formal cemeteries often occur in prehistoric contexts. Areas of high sensitivity for archaeological resources, as identified in the 2035 General Plan Background Report, are located within close proximity to the Sacramento and American rivers and other watercourses.

A Phase I Cultural Resources Assessment and record search at the NCIC were conducted for the subject property in 2015 for a separate project. The assessment and record search were negative for historic or prehistoric artifacts, features, resources, or sites.

The 2035 General Plan land use diagram designates a wide swath of land along the American River as Parks, which limits development and impacts on sensitive prehistoric resources. High sensitivity areas may be found in other areas related to the ancient flows of the rivers, with differing meanders than found

¹³ North Central Information Center (NCIC). 2015. Records Search for Sacramento Senior Living. Data from 2015.

¹⁴ HELIX Environmental Planning. 2015. Phase I Cultural Resource Assessment, Sacramento Senior Living.

today. Recent discoveries during infill construction in downtown Sacramento have shown that the downtown area is highly sensitive for both historic- and prehistoric-period archaeological resources. Native American burials and artifacts were found in 2005 during construction of the New City Hall and historic period archaeological resources are abundant downtown due to the evolving development of the area and, in part, to the raising of the surface street level in the 1860s and 1870s, which created basements out of the first floors of many buildings.

Standards of Significance

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

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

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR evaluated the potential effects of development under the 2035 General Plan on prehistoric and historic resources. See Chapter 4.4.

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), 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 2.1.14). Demolition of historic resources is deemed a last resort. (Policy HCR 2.1.15)

The Master EIR concluded that implementation of the 2035 General Plan would have a significant and unavoidable effect on historic resources and archaeological resources. (Impacts 4.4-1, 2)

Answers to Checklist Questions

Questions A, B, and D

A record search at the NCIC was conducted for the subject property in 2015 for a separate project. The record search was negative for historic or prehistoric artifacts, features, resources, or sites. Despite the negative record search results, 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 C

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 low¹⁵. 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.

¹⁵ City of Sacramento, 2014: *Sacramento 2035 General Plan Master Environmental Impact Report*. Pages 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-4** described below would reduce the impacts to **less than significant**.

Question E

The City of Sacramento sent requests for formal consultation under AB 52 to Wilton Rancheria and the United Auburn Indian Community (UAIC) on April 19, 2018. The City received a request for formal consultation from UAIC on June 22, 2018. The UAIC stated that Tribal Cultural Resources are present within the project vicinity. The UAIC provided recommended mitigation language that has been incorporated into this section. The City concurred with the mitigation measures on June 22, 2018 and consultation with UAIC was concluded by mutual agreement on the same date. With implementation of **Mitigation Measures CUL-1 through CUL-3** the proposed project would have a **less than significant** impact on tribal cultural resources.

Mitigation Measures

Mitigation Measure CUL-1:

The City shall require the applicant/contractor to provide a cultural and tribal cultural resources sensitivity and awareness training program for all personnel involved in project construction, including field consultants and construction workers. The training will be developed in coordination with interested culturally affiliated Native American Tribes. The training will be conducted in coordination with qualified cultural resources specialists. The City may invite Native American Representatives from interested culturally affiliated Native American Tribes to participate. The training shall be conducted before any construction activities begins on the project site. The program will include relevant information regarding sensitive tribal cultural resources and archaeological resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations.

The worker cultural resources sensitivity and awareness program will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and who to contact if any potential Tribal Cultural Resources or archaeological resources or artifacts are encountered.

The program will emphasize the requirement for confidentiality and culturally-appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American Tribal values.

Mitigation Measure CUL-2:

If archaeological resources, or tribal cultural resources, are encountered in the project area during construction, the following performance standards shall be met prior to continuance of construction and associated activities that may result in damage to or destruction of tribal cultural resources:

- Each resource will be evaluated for California Register of Historical Resources (CRHR) eligibility through application of established eligibility criteria (California Code of Regulations 15064.636), in consultation with consulting Native American Tribes.

If a tribal cultural resource is determined to be eligible for listing on the CRHR, the City will avoid damaging effects to the resource in accordance with California PRC Section 21084.3, if feasible. If the City determines that the project may cause a significant impact to a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or

alternatives that would avoid significant impacts to the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less-than significant may be reached:

- i. Avoid and preserve resources in place, including, but not limited to, planning construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- ii. Treat the resource with culturally appropriate dignity taking into account the Tribal cultural values and meaning of the resource, including, but not limited to, the following:
- iii. Protect the cultural character and integrity of the resource.
- iv. Protect the traditional use of the resource.
 - i. Protect the confidentiality of the resource.
 - ii. Establish permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places.
 - iii. Rebury the resource in place.
 - iv. Protect the resource.

Avoidance and preservation in place is the preferred manner of mitigating impacts to tribal cultural resources and archaeological resources and will be accomplished, if feasible, by several alternative means, including:

- Planning construction to avoid tribal cultural resources, archaeological sites and/ or other resources; incorporating sites within parks, green-space or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity.
- Recommendations for avoidance of Tribal Cultural Resources and Native American archaeological sites will be reviewed by the City representative, interested culturally affiliated Native American Tribes and other appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource.
- Native American Representatives from interested culturally affiliated Native American Tribes will be allowed to review and comment on these analyses and shall have the opportunity to meet with the City representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.
- If the discovered resource can be avoided, the construction contractor(s), will install protective fencing outside the site boundary, including a 100 foot buffer area, before construction restarts. The boundary of a Tribal Cultural Resource or a Native American archaeological site will be determined in consultation with interested culturally affiliated Native American Tribes and such Tribes will be invited to monitor the installation of fencing. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American Representatives from interested culturally affiliated Native American Tribes.
- The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area".
- Native American Representatives from interested culturally affiliated Native American Tribes and the City representative will also consult to develop measures for long term management of any discovered Tribal Cultural Resources. Consultation will be limited to actions consistent with the jurisdiction of the City and taking into account ownership of the subject property. To the extent that the City has jurisdiction, routine operation and maintenance within Tribal Cultural Resources

retaining tribal cultural integrity shall be consistent with the avoidance and minimization standards identified in this mitigation measure.

To implement these avoidance and minimization standards, the following procedures shall be followed in the event of the discovery of a tribal cultural resource:

- If any tribal archaeological resources or Native American materials, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or Native American architectural remains or articulated or disarticulated human remains are discovered on the project site, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural resources), and the construction contractor shall immediately notify the project's City representative.
- The City shall coordinate the investigation of the find with a qualified (meeting the Secretary of the Interior's Qualification Standards for Archaeology) archaeologist approved by the City and with one or more interested culturally affiliated Native American Tribes that respond to the City's invitation. As part of the site investigation and resource assessment, the City and the archaeologist shall consult with interested culturally affiliated Native American Tribes to assess the significance of the find, make recommendations for further evaluation and treatment as necessary and provide proper management recommendations should potential impacts to the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record. For any recommendations made by interested culturally affiliated Native American Tribes which are not implemented, a justification for why the recommendation was not followed will be provided in the project record.
- The City shall consider management recommendations for tribal cultural resources, including Native American archaeological resources, that are deemed appropriate, including resource avoidance or, where avoidance is infeasible in light of project design or layout or is unnecessary to avoid significant effects, preservation in place or other measures. The contractor shall implement any measures deemed by the City to be necessary and feasible to avoid or minimize significant impacts to the cultural resources. These measures may include inviting an interested culturally affiliated Native American Tribe to monitor ground-disturbing activities whenever work is occurring within 100 feet of the location of a discovered Tribal Cultural Resource or Native American archaeological site.
- If an adverse impact to tribal cultural resources, including Native American archaeological resources, occurs then consultation with interested culturally affiliated Tribes regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 shall occur, in order to identify mitigation for the impact.

Mitigation Measure CUL-3:

If an inadvertent discovery of Native American human remains is made at any time during project-related construction activities or project planning, the City will implement the procedures listed above in Mitigation Measure 2. The following performance standards shall be met prior to implementing or continuing actions such as construction, that may result in damage to or destruction of human remains: In accordance with the California Health and Safety Code, if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the burial and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (California Health and Safety Code Section 7050.5[b]). If the Coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (California Health and Safety Code Section 7050[c]). After the Coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant (MLD), in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The

responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in California PRC Section 5097.9 et seq.

If the human remains are of historic age and are determined to be not of Native American origin, the City will follow the provisions of the California Health and Safety Code Section 7000 (et seq.) regarding the disinterment and removal of non-Native American human remains.

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.

	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
Issues:			
<p>5. <u>GEOLOGY AND SOILS</u></p> <p>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?</p>			X

Data Sources/Methodology

The geologic setting and soil resources within the project site were identified and characterized based on technical information provided by the project applicant. The primary sources of data referenced for this section include the following:

- City of Sacramento 2035 General Plan Update Draft Master EIR (MEIR)
- Custom Soil Resource Report (NRCS 2018)
- Aerial Imagery, including Google Earth.

Environmental Setting

Seismicity

As described in the MEIR, the City is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known faults within the area. Fault rupture within the City is highly unlikely and, consequently, people or structures within the City would not be exposed to fault rupture. However, the MEIR identifies the entire City as being subject to potential damage from earthquake ground shaking at a maximum intensity of VII on the Modified Mercalli scale. The closest potentially active faults to the project site include the Foothills Fault System, located approximately 23 miles east of the City; the Great Valley fault located 26 miles from the City; and the Hunting Creek-Berryessa Fault located 38 miles from Sacramento. A major earthquake on any of these faults could cause strong ground shaking in the project area. However, no earthquakes with a magnitude of 3.0 or greater have been recorded within or near Sacramento County¹⁶.

Topography and Soils

The project site consists of relatively flat terrain. Soils in the project site consist of San Joaquin soil and Columbia soils. San Joaquin soils are characterized by moderately deep, well-drained soils that are underlain by a cemented hardpan and have a clay texture. Columbia soils are characterized by very deep, moderately well drained soils¹⁷.

¹⁶ United States Geological Survey (USGS). 2018. Earthquake Lists, Maps, and Statistics. Available: <https://earthquake.usgs.gov/earthquakes/browse/>. Accessed April 9, 2018.

¹⁷ Natural Resources Conservation Service, United States Department of Agriculture (NRCS). 2018. Soil Survey of Sacramento Storage. Available: <http://websoilsurvey.nrcs.usda.gov>. Accessed March 26, 2018.

Regional Geology

The project site 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 Sierra 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 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 systems¹⁸.

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 Master EIR and Applicable General Plan Policies

Chapter 4.5 of the Master EIR evaluated the potential effects related to seismic hazards, underlying soil characteristics, slope stability, erosion, existing mineral resources and paleontological resources in the City. Implementation of identified policies in the 2035 General Plan reduced all effects to a less-than-significant level. Policy EC 1.1.1 requires regular review of the City's seismic and geologic safety standards, and Policy EC 1.1.2 requires geotechnical investigations for project sites to identify and respond to geologic hazards, when present.

Answers to Checklist Questions

Question A

As discussed above, the project would not be subject to fault rupture; however, ground shaking may 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 than 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 2035 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. According to the NRCS Web Soil Survey, soils in the project site consist of San Joaquin and Columbia soils. San Joaquin soils are characterized by moderately deep and very deep, well-drained soils that are underlain with

¹⁸ Helley, Edward and David Hardwood. 1985. Geologic Map of Late Cenozoic Deposits of the Sacramento Valley and Northern Sierran Foothills, California.

cemented hardpan, and clay texture. Columbia soils are characterized by very deep, moderately well drained soils. Therefore, impacts from liquefaction would be **less than significant**.

Construction activities could involve excavating, filling, moving, 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.

Because the proposed project would be required to comply with federal, state, and local construction standards, including seismic engineering standards, it would not expose people or structures to the risk of loss, injury, or death to people or structures. In addition, the project site is located in an area with historically low seismic activity and is unlikely to be affected by strong seismic ground shaking. Therefore, a **less than significant impact** would occur.

Mitigation Measures

None

Findings

The project would have no additional project-specific environmental effects relating to Geology and Soils.

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

Data Sources/Methodology

Potential hazards associated with the project site were reviewed based on literature review and database searches. The primary sources of data referenced for this section include the following:

- U.S. EPA Envirofact website¹⁹
- The California Department of Toxic Substance Control Hazardous Waste and Substance List²⁰
- U.S. EPA’s Superfund National Priority List²¹

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 AQMD 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).

¹⁹ United States Environmental Protection Agency (EPA). 2018. *Envirofacts: Hazardous Waste and Substance List*. Accessed on May 23, 2018 at <https://www3.epa.gov/enviro>.

²⁰ United States Environmental Protection Agency (EPA). 2018. *Superfund National Priority List* Accessed on May 23, 2018 at <https://www3.epa.gov/enviro/>

²¹ California Department of Toxic Control. 2018. *Hazardous Waste and Substance List*. Accessed on May 23, 2018 at http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

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.

Standards of Significance

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

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

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR 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

No existing hazardous materials have been identified on the project site, and the site has no history of past land uses associated with potentially hazardous sites. Future construction activities on the project site would 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, should 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

The project site is not included on the lists of hazardous materials sites compiled by Sacramento County pursuant to Government Code Section 65962 or the U.S. EPA²², or the U.S. EPA's Superfund National Priorities List²³. The project site is vacant and does not include any existing buildings. Any potentially

²² United States Environmental Protection Agency (EPA). 2018. *Envirofacts: Hazardous Waste and Substance List*. Accessed on May 23, 2018 at <https://www3.epa.gov/enviro>.

²³ United States Environmental Protection Agency (EPA). 2018. *Superfund National Priority List* Accessed on May 23, 2018 at <https://www3.epa.gov/enviro>

hazardous materials utilized as a part of construction for the project would be contained, stored and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations. 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.). 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 would not create a significant hazard to the public or the environment. 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 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 and installation of utilities within the ground, construction activities would primarily be limited to a depth of approximately 5 feet. There is no evidence to suggest that this construction action would require dewatering efforts or the introduction of contaminated groundwater to the surface; this impact would be **less than significant**.

Mitigation Measures

None

Findings

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

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
7. <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 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 (Flood Map 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 X²⁴.

The public wastewater collection system with the City includes a combined sewer system (CSS) in the older Central City and a newer separated sewer system (sanitary sewer) in the remaining areas of the City and is the treatment service type for this project. The Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (formerly County Services District [CSD-1]) provide both collection and treatment services within their service area for the portions of the city served by the separate sewer system. Wastewater generated in this area is collected by trunk facilities in the Sacramento Area Sewer District and then conveyed via interceptors to the Sacramento Regional Wastewater Treatment Plant. The SRCSD has prepared and is implementing its master plan related to wastewater conveyance – the Interceptor Master Plan 2000 – and the SASD is implementing its master plan – the Sewerage Facilities Master Plan Update 2006.

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

²⁴ Federal Emergency Management Agency (FEMA). 2012. Available: <https://msc.fema.gov/portal>. Accessed April 9, 2018

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

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

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

The City of Sacramento Stormwater Quality Improvement Program (SQIP) is a comprehensive program comprised of various program elements and activities designed to reduce stormwater pollution to Maximum Extent Practicable (MEP) and eliminate prohibited non-stormwater discharges through a National Pollutant Discharge Elimination System (NPDES) municipal stormwater discharge permit. The Stormwater Quality Improvement Program is a partner in the larger Sacramento Stormwater Quality Partnership that covers the Sacramento County area including the Cities of Citrus Heights, Elk Grove, Folsom, Galt, and Rancho Cordova.

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.

Standards of Significance

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

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

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

Chapter 4.7 of the Master EIR 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), comprehensive flood management (Policy EC 2.1.23), and construction of adequate drainage facilities with new development (Policy ER 1.1.1 to ER 1.1.10) were identified that the Master EIR concluded would reduce 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 construct a 170 unit senior apartment complex, a 120 room hotel, 50,000± square feet of retail, and a 139,482± square foot self-storage facility. The redevelopment of the site would result with the majority of the site being covered in impervious surfaces. This would decrease storm water absorption, and increase storm water discharges and flows, with the potential to violate water quality standards associated with urban runoff (nonpoint-source pollutants) to storm drains.

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

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

Question B

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

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

Mitigation Measures

None

Findings

The project would have no additional project-specific environmental effects relating to Hydrology and Water Quality.

SACRAMENTO SELF-STORAGE (P17-063)

2018 INITIAL STUDY

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
8. NOISE			
Would the project:			
A) Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?		X	
B) Result in residential interior noise levels of 45 dBA L _{dn} or greater caused by noise level increases due to the project?		X	
C) Result in construction noise levels that exceed the standards in the City of Sacramento general plan or 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

Data Sources/Methodology

Project-specific noise modeling was prepared for the proposed project and is incorporated into this ISMND (HELIX 2018). The primary sources of data referenced for this section include the following:

- City of Sacramento 2035 General Plan Update Draft Master EIR (MEIR)²⁵;
- Noise Modeling, HELIX 2018.

²⁵ City of Sacramento, 2015. City of Sacramento 2035 General Plan Update Master Environmental Impact Report. Certified March 3, 2015.

Environmental Setting

Fundamentals of Sound and Environmental Noise

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ} , with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and sound levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level (L_{DN}), which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours, but no added weighting on the evening hours. Sound levels expressed in CNEL are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver contribute to the sound level and characteristics of the noise perceived by the receiver. The field of acoustics deals primarily with the propagation and control of sound.

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source determines the loudness of that source. A logarithmic scale is used to describe sound pressure level (SPL) in terms of dBA units. The threshold of hearing for the human ear is approximately 0 dBA, which corresponds to 20 micro Pascals (mPa). Because decibels are logarithmic units, SPL cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one source under the same conditions.

Vibration

Vibration is defined as any oscillatory motion induced in a structure or mechanical device as a direct result of some type of input excitation. Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or manufactured (explosions, trains, machinery, traffic, construction equipment, etc.). Vibration sources may be transient, steady-state (continuous), or pseudo steady-state. Examples of transient construction vibrations are those that occur from blasting with explosives, impact pile driving, demolition, and wrecking balls.

Ambient and source vibration information are expressed in terms of the peak particle velocity (PPV) in inches per second (in./sec). The root mean square (RMS) of a signal is the average of the squared amplitude of the signal in decibels (relative to 1 micro-in./sec). Because the net average of a vibration signal is zero, the RMS amplitude is used to describe the “smoothed” vibration amplitude. The RMS amplitude is always less than the PPV and is always positive. The RMS average is typically calculated over a one-second period.

The background vibration velocity level in residential areas is usually 50 vibration decibels (VdB) or lower; this is well below the level perceptible by humans, which is approximately 65 VdB. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Existing Sensitive Land Uses

Noise sensitive land uses (NSLU) are land uses that may be subject to stress and/or interference from excessive noise and generally include residences, hospitals, schools, hotels, resorts, libraries, sensitive wildlife habitat, or similar facilities where quiet is an important attribute of the environment. NSLUs in the project vicinity include the assisted living and memory care facility that is currently under construction immediately adjacent to the western boundary of the project site.

Existing Noise Setting

The proposed project is in an urban area surrounded by commercial, office, industrial, and residential uses. Existing noise sources in the immediate vicinity of the project site include Highway 160 and adjacent roadways. An ambient noise measurement survey was conducted on April 20, 2018 at the project site and included three 10-minute measurements and one 15-minute measurement. Noise measurement locations and results are shown in **Table 8**.

Table 8: Ambient Noise Measurement Survey

Site	Location	Time	Noise Level (dBA L _{Eq})
1	Northwestern corner of site along Leisure Lane	12:31 p.m. – 12:41 p.m.	58.8
2	Center of site	12:47 p.m. – 12:57 p.m.	55.9
3	Eastern edge of site	1:23 p.m. – 1:33 p.m.	55.5
4	Southeastern portion of site along Expo Parkway	1:05 p.m. – 1:20 p.m.	55.7

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:

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

Summary of Analysis under the 2035 General Plan Master EIR and Applicable General Plan Policies

The Master EIR 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 (Policy 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

Off-Site Exterior Noise Levels

Operational Vehicular Traffic Noise

The effects of project-generated traffic on existing off-site uses along Canterbury Road, Expo Parkway, Leisure Lane Road, and Exposition Boulevard were modeled using the Federal Highway Administration’s Traffic Noise Model (TNM) and traffic volumes provided by Kimley-Horn and Associates, Inc. Based on the modeled existing noise levels along the roadways, Table EC 2 of the City of Sacramento General Plan was used to determine the allowable noise increase for the nearby off-site uses. **Table 9** shows the results of the modeling.

TABLE 9: OFF-SITE TRAFFIC NOISE IMPACTS

Roadway	Existing CNEL @ 100 feet	Allowable Increase	Existing Plus Project CNEL @ 100 feet	Increase	Significant Impact?
Canterbury Road	53.5	5	53.9	0.4	No
Expo Parkway	49.7	5	50.6	0.9	No
Leisure Lane	53.2	5	53.6	0.4	No
Exposition Boulevard	62	5	62.3	0.3	No

As shown in **Table 9**, project-generated traffic would result in noise increases of less than 1 dB along each of the four analyzed roadway segments, which would be less than the allowable increase per Table EC 2 of the City of Sacramento General Plan. Therefore, traffic noise generated by the project would result in a less-than-significant impact.

Operational Stationary Noise

The proposed project would likely include heating, ventilation, and air-conditioning (HVAC) systems on the rooftops of the proposed structures. The specific types and locations of the HVAC units are not known at this stage of the planning process. A typical HVAC unit generates an approximate noise level of 51 dBA L_{EQ} at 100 feet.

According to the City Code Chapter 8.68.060 (Exterior Noise Standards), a significant impact would occur if project-related HVAC units generate noise at the adjacent assisted living and memory care facility property in excess of 55 dBA from 7:00 a.m. to 10:00 p.m. or 50 dBA from 10:00 p.m. to 7:00 a.m. It is

assumed that the HVAC units would generate a noise level of 51 dBA L_{EQ} at 100 feet and experience a 6-dB noise reduction for every doubling of distance. Using this metric, if the project's HVAC units are located within 107 feet of the adjacent assisted living and memory care facility property, they may exceed the 50-dBA nighttime noise standard and resulting impacts would be significant. Implementation of **Mitigation Measure NOI-1** would be required to meet the applicable standards and reduce noise levels at the adjacent residential property to a level less than significant.

On-Site Exterior Noise Levels

According to the City of Sacramento 2035 General Plan Policy EC 3.1.1, the normally acceptable exterior noise level for Urban Residential Infill and Mixed-Use Projects in 70 CNEL. Vehicular traffic along Highway 160, Leisure Lane, and Expo Parkway are the predominant sources of noise at the project site. Computer Aided Noise Abatement (CadnaA) Version 2018 was used to determine the distance to the 70 CNEL contour within the project site resulting from traffic along Highway 160, Leisure Lane, and Expo Parkway. Based on model results, if residential or hotel exterior use areas are located within 157 feet of the northern project boundary of parcel 2, they may be exposed to noise levels in excess of the 70 CNEL normally acceptable exterior noise level, and resulting impacts would be significant. Implementation of **Mitigation Measure NOI-2** would be required to meet the applicable exterior noise standard set forth in the City of Sacramento General Plan and reduce the impact to a level **less than significant**.

Question B

Off-Site Interior Noise Levels

The adjacent assisted living and memory care facility could be exposed to elevated noise levels due to operation of the proposed project through project-generated traffic on nearby roadways and through the use of rooftop HVAC units. However, as shown in **Table 9**, the project would not cause noise levels on the roadways adjacent to the assisted living and memory care facility to exceed 60 CNEL and would therefore not cause interior noise levels at the facility to exceed 45 CNEL. In addition, implementing **Mitigation Measure NOI-1** would attenuate noise from the project's rooftop HVAC units and would result in noise from the HVAC units that would not exceed interior noise levels at the assisted living and memory care facility above 45 CNEL. Interior noise impacts to off-site uses would **be less than significant with mitigation** incorporated.

On-Site Interior Noise Levels

The proposed project would include residential and transient lodging uses that would be exposed to noise from traffic along Highway 160, Leisure Lane, and Expo Parkway and would be required to comply with the 45 CNEL interior noise level standard. Typical residential-type construction generally results in an exterior-to-interior noise reduction of 15 dB. Therefore, where facades of the proposed project's structures are exposed to exterior noise levels in excess of 60 dBA, interior noise levels could exceed 45 CNEL. CadnaA modeling was used to determine the 60 CNEL contours within the project site resulting from traffic along Highway 160, Leisure Lane, and Expo Parkway. Based on model results, the entire project site is within the 60 CNEL contour, and interior noise levels for residential or hotel uses could, therefore, be in excess of the 45 CNEL standard. As such, impacts would be potentially significant. As building facades of interior use areas may be exposed to noise levels of 60 dBA or greater, **Mitigation Measure NOI-2** would be required to meet the applicable interior noise standard set forth in the City of Sacramento General Plan.

Question C

Construction of the proposed project would involve fine grading, erecting new buildings, and paving the site. The magnitude of the impact would depend on the type of construction activity, equipment, duration of each construction phase, distance between the noise source and receiver, and intervening structures. Construction would generate elevated noise levels that may be audible at nearby commercial, office, industrial, and residential uses in the vicinity of the project site.

Construction equipment would not all operate at the same time or location. Furthermore, construction equipment would not be in constant use during the 8-hour operating day. **Table 10** provides the 50-foot distance noise level for expected construction equipment.

Table 10: Construction equipment noise levels

Unit	Percent Operating Time	L _{MAX} at 50 feet	dBA L _{EQ} at 50 feet
Backhoe	40	77.6	73.6
Compactor	20	83.2	76.2
Compressor	40	77.7	73.7
Concrete Mixer Truck	40	78.8	74.8
Concrete Pump Truck	20	81.4	74.4
Crane	16	80.6	76.7
Dump Truck	50	76.5	72.5
Drum Mixer	40	80.0	77.0
Medium Excavator	40	78.0	74.0
Large Excavator	40	80.7	76.7
Front-End Loader	40	79.1	75.1
Paver	50	77.2	74.2
Roller	20	80.0	73.0

Source: U.S. Department of Transportation 2008

An excavator and front-end loader would likely be used simultaneously for underground utility installation and general building construction at the site and would be loudest combination of construction equipment. This combination was therefore analyzed to provide a conservation analysis for construction noise impacts. The nearest off-site land use would be the assisted living and memory care facility that is currently under construction adjacent to the western boundary of parcel 1. It is assumed that the assisted living and memory care facility would be operational during construction of the proposed project. Construction activities in parcel 1 would occur at an average distance of 200 feet from the operational assisted living and memory care facility. The simultaneous use of an excavator and front-end loader at 200 feet would generate a noise level of 67.0 dBA L_{EQ}.

The City Code Chapter 8.68.080 (Exemptions) exempts construction noise from its noise standards provided that they occur between the hours of 7:00 a.m. and 6:00 p.m. Monday through Saturday and between the hours of 9:00 a.m. and 6:00 p.m. on Sunday. Because project-related construction activities would only occur within the hours specified in the City Code, the proposed project would not result in a violation of the City's construction noise standards, and impacts would be **less than significant**.

Question D

Operation of the proposed project would not include activities likely to generate significant levels of vibration; therefore, it is not anticipated that operation of the proposed project would expose nearby residential or commercial land uses to excessive vibration levels.

An on-site source of vibration during project construction would be a vibratory roller (primarily used to achieve soil compaction as part of the foundation and paving construction). The use of a vibratory roller during construction would occur at an average distance of 200 feet from the nearest existing off-site residential or commercial land use. A vibratory roller creates approximately 0.210 in/sec PPV at a

distance of 25 feet. At a distance of 200 feet, a vibratory roller would create a PPV of 0.02 in/sec²⁶. This would be below the threshold of 0.5 in/sec PPV and impacts would therefore be less than significant.

Because the proposed project consists of four parcels, it is likely that the parcels would be developed at different times. If one of the proposed commercial or residential uses is constructed and becomes operational prior to the construction of the adjacent parcels, it may be subjected to vibration during the later construction of the adjacent parcels. Construction on one of the parcels could use a vibratory roller at an average of approximately 100 feet from another one of the parcels. At a distance of 100 feet, a vibratory roller would create a PPV of 0.05 in/sec. This would be below the threshold of 0.5 in/sec and impacts would be **less than significant**.

Question E

The nearest rail line to the project site is approximately 900 feet to the east. At this distance, it would not generate noticeable vibration at the project site. Highway 160 is located as close as approximately 100 feet from the northern boundary of the project site. Transportation-related vibration levels on freeway shoulders generally do not exceed 0.08 in/sec and tend to attenuate rapidly with distance (Caltrans 2002). It is therefore anticipated that vibration levels from traffic along Highway 160 would not exceed 0.5 in/sec at the proposed project's residential or commercial uses and impacts would be **less than significant**.

Question F

A records search at the NCIC was conducted for the project site and a 0.5-mile buffer in 2015. The search identified no historical and archaeological resources on-site and in adjacent areas (see **Appendix C**). Historic buildings or archaeological sites would not be exposed to vibration PPVs greater than 0.2 in/sec due to project construction or highway traffic. Impacts would be **less than significant**.

Mitigation Measures

Mitigation Measure NOI-1:

Rooftops with HVAC units located within 107 feet of the adjacent assisted living and memory care facility shall include an architectural parapet to reduce noise levels. The parapet shall be constructed along the edges of the structures' roofs. The parapet shall be at least one foot higher than the tallest rooftop equipment. No gaps or perforations shall be constructed in the parapet.

Mitigation Measure NOI-02

Subsequent projects, which utilize this ISMND, shall submit a separate noise analysis demonstrating that the design, construction, and operation of the buildings would not exceed City thresholds as outlined in the City's General Plan.

Findings

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

²⁶ Equipment PPV = Reference PPV * (25/D)ⁿ(in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receptor in feet, and n= 1.1 (the value related to the attenuation rate through the ground; formula from Caltrans 2013).

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

Environmental Setting

The project site is located within a Suburban Center region of the North Sacramento Community Plan area. Public services are discussed individually below.

Fire

The City of Sacramento provides fire protection services to the project area. The City Fire Department operates approximately 21 stations. Fire stations are strategically located to provide a maximum efficiency service radius of two miles (SGPU DEIR, M-1). This service radius virtually assures blanket coverage of the City. Typical response time to fire calls is four minutes (SGPU DEIR, M-1). The project site is located within the response zone for Fire Station 19, located at 1700 Challenge Way, approximately 1.35 miles southeast of the project site.

Police

The City of Sacramento provides police protection service to the project area. The project site is located in District 2, Beat 2C of the North of the American River service area and would be served by the William J. Kinney police station located at 3550 Marysville Boulevard.

Schools and Libraries

The project site is located within the Sacramento City Unified School District and approximately 2.5 miles northwest of California State University, Sacramento. The project site is located in an area served by urban levels of library services.

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 Master EIR and Applicable General Plan Policies

The Master EIR evaluated the potential effects of the 2035 General Plan on various public services. These include 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 Master EIR concluded that effects of development that could occur under the general plan 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) reduce impacts on schools to a less-than-significant level. (Impacts 4.10-3, 4) Impacts on library facilities were considered less than significant (Impact 4.10-5).

Answers to Checklist Questions

Question A

The proposed project would construct a 170 unit senior apartment complex, a 120-room hotel, 50,000± square feet of retail, and a 139,482± square foot self-storage facility. While redevelopment of the project site would result in an increase in public service needs, 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.

Fire and Police

The project site is served by the City of Sacramento Police Department and Fire Department. The Police Department participates in project site design, and the project would be consistent with the principles of Crime prevention through environmental design (CPTED) which is a multi-disciplinary approach to deterring criminal behavior through the design of project sites. CPTED principles relate to multiple aspects of site design, including lighting and visibility. These actions will ensure that the site design minimizes enforcement activity and the resulting burden on police services. Consistent with the MEIR's conclusions, implementation of the proposed project would result in a **less than significant impact** related to fire and police protection services.

Schools and Libraries

Public schools in the vicinity of the project site are operated by the Sacramento City Unified School District. The proposed project would construct a senior apartment complex, a hotel, retail stores, and a self-storage facility. These uses would not result in additional students and would not affect the enrollment at local schools.

Consistent with the MEIR's conclusions, implementation of the proposed project would result in a **less than significant impact** related to school facilities.

Mitigation Measures

None

Findings

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

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
10. RECREATION Would the project:			
A) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?			X
B) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan?			X

Environmental Setting

The City of Sacramento Parks and Recreation (Parks) Department maintains parks and recreational facilities within the City of Sacramento. The Parks Department classifies parks according to three distinct types: (1) neighborhood parks; (2) community parks; and, (3) regional parks. Neighborhood parks are typically less than ten acres in size and are intended to be used primarily by residents within a half-mile radius. Neighborhood parks contribute to a sense of community by providing gathering places for recreation, entertainment, sports, or quiet relaxation. Community Parks are generally 10 to 60 acres and serve an area within approximately two to three miles, encompassing several neighborhoods and meeting the requirements of a large portion of the City. Regional parks are larger in size and serve the entire City, as well as population from around the region. Regional parks are developed with a wide range of improvements not usually found in local neighborhood and community parks.²⁷ The City of Sacramento currently has 226 parks and parkways totaling 3,200 acres of land²⁸.

The project site is located in East Sacramento, which hosts several park facilities and recreation areas. The closest park to the proposed project site is the American River Parkway, which is a regional park, located 900± feet south of the project site. The next closest park is Sutter’s Landing Regional Park, located 3,000 feet south of the project site and is also a regional park.

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 Master EIR and Applicable General Plan Policies

Chapter 4.9 of the Master EIR 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

²⁷ City of Sacramento Department of Parks and Recreation. 2015. Available: <http://portal.cityofsacramento.org/ParksandRec/Parks>. Accessed May 1, 2018.

²⁸ City of Sacramento Department of Parks and Recreation. Updated 2018. Available at <https://www.cityofsacramento.org/ParksandRec/Parks/Park-Directory>. Accessed on May 5, 2018.

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

The proposed project would provide housing for seniors with an estimated 150-170 units, and temporary housing for guests at the proposed 120 room hotel. While the proposed project would result in an increase in the population of the area and demand for recreational facilities, the developments will include appropriate recreational amenities for their guests/residents. The senior apartments would include on-site recreational amenities for residents and the hotel would include on-site recreational amenities for guests. The senior apartment project would be required to pay City of Sacramento park fees. The project will not cause or accelerate substantial physical deterioration of existing parks or recreational facilities, nor will it create a new need for the construction or modification of recreational facilities. Therefore, impacts related to recreational facilities would be **less than significant**.

Mitigation Measures

None

Findings

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

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>11. TRANSPORTATION AND CIRCULATION Would the project:</p>			
<p>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.</p>			X
<p>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.?</p>			X
<p>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?</p>			X
<p>D) Transit: adversely affect public transit operations or fail to adequately provide for access to public transit?</p>			X
<p>E) Bicycle facilities: adversely affect bicycle travel, bicycle paths or fail to adequately provide for access by bicycle?</p>		X	
<p>F) Pedestrian: adversely affect pedestrian travel, pedestrian paths or fail to adequately provide for access by pedestrians?</p>		X	

Data Sources/Methodology

Transportation and circulation associated with the proposed project was analyzed by Kimley Horn in a Traffic Impact Study (TIS) prepared in the spring of 2018²⁹. The analysis report is summarized below and is presented in its entirety in **Appendix E**.

²⁹ Kimley-Horn: Planning and Design Engineering Consultants. 2018. *Sacramento Self Storage Traffic Impact Study*. Sacramento, CA. (Appendix G)

Environmental Setting

Access

The project site is located west of Exposition Boulevard. Leisure Lane and Expo Parkway are located along the northern and southern project frontages, respectively. Access to the project site is proposed along Leisure Lane via an existing, full-access driveway, and a proposed full-access driveway. Along Expo Parkway, access to the site will be provided by an existing, shared, full-access driveway and a proposed full-access driveway located between Parcel 1 and Parcel 3.

Project Area Roadways

Leisure Lane

Leisure Lane is an east-west collector roadway bordering the northern edge of the project site. Leisure Lane connects the commercial uses west of the site with SR-160 and Exposition Boulevard. Along the project frontage, Leisure Lane has one lane in each direction, and there are currently no bicycle facilities.

Expo Parkway

Expo Parkway is an east-west collector roadway bordering the southern edge of the project site. Expo Parkway connects to Exposition Boulevard southeast of the project site. Expo Parkway becomes Canterbury Road after the intersection with Leisure Lane and connects to SR-160 northwest of the project site. Expo Parkway has one lane in each direction along the project frontage. There are currently no bicycle facilities on Expo Parkway. However, sidewalks are present along the proposed project frontage.

Public Transit System

Sacramento Regional Transit District (RT) provides transit service in the greater Sacramento metropolitan area. The project is not directly adjacent to any public transit routes³⁰. The nearest transit stop is located on Exposition Boulevard approximately a mile away from the project site. The stop is served by RT Routes 67 and 68. In addition, the peak-hour service provided by Route 29 travels along SR 160, just north of the project site. Figure 3 in Appendix F depicts the transit routes within the project vicinity.

Existing/Planned Bicycle and Pedestrian Facilities

There are currently no on-street bicycle facilities directly adjacent to the project location. There is a connection to the Jedediah Smith Memorial Trail along Expo Parkway, located less than a quarter mile west of the project site. Jedediah Smith Memorial Trail is a Class I bike path, running for 32 miles along the American River³¹. There are Class II Bicycle Lanes located along Exposition Boulevard. In addition, according to the City's *Bicycle Master Plan*³², shown in Figure 4 in Appendix F, on-street bicycle facilities are proposed on Leisure Lane.

There are currently sidewalk and streetlights along the southern edge of the project site. According to the site plan, the segment of sidewalk along the northeastern edge of the project will be extended along the northern project frontage. There are cross walks present at the intersections of Leisure Lane and Exposition Boulevard and Exposition Boulevard and Expo Parkway. Existing and proposed pedestrian facilities are contained in the City's *Pedestrian Master Plan*³³.

³⁰ Sacramento Regional Transit District. SacRT Image Map. Available at: <http://www.sacrt.com/systemmap/A1.stm>.

³¹ Sacramento County. 2018. *American River Parkway – Jedediah Smith Memorial Trail*. Available at: <http://www.regionalparks.saccounty.net/Parks/Pages/JedediahSmith.aspx>

³² City of Sacramento. 2016. *Bicycle Master Plan*. Accessed at: <https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Transportation/Bicycle-Master-Plan/Sacramento-2016-Bicycle-Master-Plan.pdf?la=en>

³³ City of Sacramento Department of Transportation. 2006. *Pedestrian Master Plan*. Available at: <http://www.sacdot.com/Pages/PedestrianMasterPlan.aspx>

Existing Intersection Geometry

Figure 5 in **Appendix E** illustrates the study facilities, existing traffic control, and existing lane configurations.

Existing Traffic Volumes

The TIS prepared for the proposed project, included traffic measurements to characterize on-site conditions. Weekday AM and PM peak-period turning movement traffic counts were conducted on March 21, 2018, at the existing study intersections. These counts were conducted between the hours of 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. In addition, there is an approved nursing home currently under construction immediately to the west of the project site.

Intersection Analysis

Levels of Service for this study were determined using methods defined in the *Highway Capacity Manual, 2010* (HCM) and appropriate traffic analysis software. The HCM includes procedures for analyzing side street stop controlled (SSSC), all-way stop controlled (AWSC), and signalized intersections. The SSSC procedure defines LOS as a function of average control delay for each minor street approach movement. **Table 11** presents intersection LOS definitions as defined in the HCM.

TABLE 11- INTERSECTION LEVEL OF SERVICE CRITERIA

Level of Service (LOS)	Unsignalized Average Control Delay (sec/veh)	Signalized Control Delay per Vehicle (sec/veh)
A	≤ 10	≤ 10
B	> 10 – 15	> 10 – 20
C	> 15 – 25	> 20 – 35
D	> 25 – 35	> 35 – 55
E	> 35 – 50	> 55 – 80
F	> 50	> 80

Source: Highway Capacity Manual 2010

Note: SSSC delay is based on the worst approach movement

Results of Existing Conditions Analysis

Table 12 presents the peak-hour intersection operating conditions for this analysis scenario. As indicated in **Table 12**, the intersections of Leisure Lane with Expo Parkway and Exposition Boulevard both operate at LOS C or better during the AM and PM peak-hours. Analysis worksheets for this scenario are provided in Appendix C of Appendix F.

Table 12- Existing (2018) Intersection Levels of Service

Intersection	Control	Peak Hour	Existing (2018)	
			Delay	LOS
Leisure Lane/Slobe Avenue @ Canterbury Road/Expo Parkway	ASWC	AM	11.4	B
		PM	14.4	B
Leisure Lane @Exposition Boulevard/SR-160 Eastbound Ramps	Signal	AM	17.3	B
		PM	22.4	C

Source: Kimley-Horn 2018.

Trip Generation

The number of trips anticipated to be generated by proposed projects were approximated using data included in the *Trip Generation Manual, 10th Edition*, published by the Institute of Transportation Engineers (ITE). ITE Land Use Code 151 (Mini Warehouse) was used to represent the 139,482-sf of self-storage facility. ITE Lane Use Codes 252 (Senior Housing-Attached), 310 (Hotel), and 820 (Shopping Center) were used to represent the senior apartments, hotel, and retail uses, respectively.

Internal capture between senior apartments, hotel, and retail uses was calculated using the National Cooperative Highway Research Program (NCHRP) Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*, 2011. This is the methodology recommended by the *ITE Trip Generation Handbook, 3rd Edition*. Consistent with guidance provided by the *ITE Trip Generation Handbook, 3rd Edition*, pass-by reductions of 16-percent for Daily and AM peak-hour trips, and 34-percent for PM peak hour trips, were incorporated to account for the proportion of retail (Shopping Center) trips that are understood to already be on the adjacent roadway network. The trips generated by this mix of uses is presented in **Table 13**.

As shown in **Table 13**, the proposed project is estimated to generate 4,546 net new daily trips, with 247 and 297 trips occurring during the AM and PM peak-hours, respectively. As shown in **Table 14**, the previous use of the site is estimated to have included 3,028 daily trips, with 148 and 203 trips occurring during the AM and PM peak-hours respectively. For the purposes of this analysis, no trip generation credit is given for the previous hotel use.

Cumulative Analysis

As previously discussed, the TIS evaluates the effect of the proposed project on the surrounding transportation system, limited to consideration of Existing (2018) and Existing (2018) plus Proposed Project Conditions. The cumulative impacts on roadway segments, transit, bicycle facilities, pedestrian circulation, and parking from planned *2035 General Plan* development were identified and analyzed in the *2035 General Plan Master EIR*. Because the proposed project is consistent with the *2035 General Plan*, TIS only reviews such issues on a project-specific basis only (no cumulative conditions analyses) (Kimley-Horn 2018).

Table 13- Proposed Project Trip Generation

Land Use (ITE Code)	Size	Daily Trips	AM Peak Hour				PM Peak Hour					
			Total Trips	IN		OUT		Total Trips	IN		OUT	
				%	Trips	%	Trips		%	Trips	%	Trips
Proposed Project												
Mini Warehouse (151)	139.482 KSF	212	14	60	8	40	6	24	47	11	53	13
Senior Housing-Attached (252)	170 Units	660	34	35	12	65	22	43	55	24	45	19
Hotel (310)	120 Rooms	928	55	59	32	41	23	64	51	33	49	31
Shopping Center (820)	50 KSF	3754	177	62	110	38	67	325	48	156	52	169
Subtotal Trips		5,554	280		162		118	456		224		232
Senior Housing Internal Reduction* AM (Enter 0%, Exit 0%) PM (Enter 46%, Exit 47%)		-152	0		0		0	-20		-11		-9
Hotel Internal Reduction* AM (Enter 0%, Exit 13%) PM (Enter 21%, Exit 10%)		-94	-2		0		-2	-10		-7		-3
Shopping Center Internal Reduction* AM (Enter 3%, Exit 0%) PM (Enter 7%, Exit 10%)		-192	-3		-3		0	-28		-11		-17
Subtotal Trips		5,116	275		159		116	398		195		203
Shopping Center Pass-by Trip Reduction*: Daily and Am Peak-Hour (16%); PM Peak-hour (34%)		-570	-28		-17		-11	-101		-49		-52
Net New Project Trips		4,546	247		142		105	287		146		151

Source: Trip Generation Manual, 10th Edition, ITE
*Trip Generation Handbook 3rd Edition, ITE
Kimley-Horn 2018.

Table 14- Previous Hotel Use Trip Generation

Land Use (ITE Code)	Size	Daily Trips	AM Peak Hour				PM Peak Hour					
			Total Trips	IN		OUT		Total Trips	IN		OUT	
				%	Trips	%	Trips		%	Trips	%	Trips
Previous Hotel Use												
Hotel (310)	306 Rooms	3,028	148	59	87	41	61	203	51	104	49	99

Source: Trip Generation Manual, 10th Edition, ITE Kimley Horn 2018.

Intersection Operations

As indicated in **Table 15**, the study intersections operate between LOS A and C with the addition of proposed project traffic during the AM and PM peak-hours. Analysis worksheets for this scenario are provided in **Appendix E**.

Table 15- Existing (2018) and Existing (2018) plus Proposed Project Intersection Levels of Service

ID	Intersection	Control	Peak Hour	Existing (2018)		Existing (2018) plus Proposed Project	
				Delay	LOS	Delay	LOS
1	Leisure Lane/Slobe Avenue @ Canterbury Road/Expo Parkway	AWSC	AM	11.4	B	12.2	B
			PM	14.4	B	14.2	B
2	Leisure Lane @ Exposition Boulevard/SR-160 Eastbound Ramps	Signal	AM	17.3	B	17.9	B
			PM	22.4	C	23.3	C
3	Leisure Lane @ Project Driveway #1	SSSC	AM	Existing Plus Project Conditions Only		2 (10.1 NB)	A (B)
			PM			2.3 (11.2 NB)	A (B)
4	Leisure Lane @ Project Driveway #2	SSSC	AM			1.4 (10.3 NB)	A (B)
			PM			1.7 (11.4 NB)	A (B)
5	Expo Parkway @ Project Driveway #3	SSSC	AM			0.7 (9.3 SB)	A (A)
			PM			0.6 (10.0 SB)	A (B)
6	Expo Parkway @ Project Driveway #4	SSSC	AM			1.7 (9.9 SB)	A (A)
			PM			2.1 (11.1 SB)	A (B)

Note: SSSC intersections are reported with the overall intersection delay followed by the worst movement's delay. The LOS results are reported with the overall intersection LOS followed by the worst movement's LOS.
Source: Kimley-Horn 2018.

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

- A) 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 the project), or

- B) The LOS (without the 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

California Department of Transportation (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 Master EIR and Applicable General Plan Policies

Transportation and circulation were discussed in the Master EIR 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 Mobility Goal 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), support for state highway expansion and management consistent with the Sacramento Area Council of Governments Metropolitan Transportation Plan/Sustainable Communities Strategy (SACOG MTP/SCS) (Policy M 1.5.6) and development that encourages walking and biking (Policy LU 4.2.1).

While the general plan includes numerous policies that direct the development of the City's transportation system, the Master EIR concluded that the general plan development would result in significant and unavoidable effects. See Impacts 4.12-3 (roadway segments in adjacent communities, and Impact 4.12-4 (freeway segments).

Answers to Checklist Questions

Question 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. **Table 15** provides the AM and PM peak-hour traffic volumes at the study intersection for the existing (2017) plus proposed project conditions. The proposed project would not include changes to traffic controls or lane geometry.

The TIS prepared for the proposed project, projected the number of new trips that the proposed project would add to the roadway network. **Table 13** summarizes estimated project trip generation for the proposed project.

Based on projected trip generation for the proposed project, each study intersection was analyzed for performance under existing (2018) conditions and existing conditions with addition of trips from the proposed project. **Table 15** provides a summary of the intersection analysis.

Construction

Construction-related activity may potentially disrupt the existing transportation network in the surrounding project area. Possible temporary lane closures, street closures, sidewalk closures, and bikeway closures may impact pedestrian, bicycle, and transit accessibility. Heavy vehicles will access the site and may need to be staged for construction. As a result of these activities, existing roadway operation conditions may be degraded.

City Code section 12.20.030 requires that a construction traffic control plan will be prepared and approved prior to the beginning of project construction, to the satisfaction of the City Traffic Engineer and subject to review by all affected agencies. All work performed during construction must conform to the conditions and requirements of the approved plan. The plan shall ensure that safe and efficient movement of traffic through the construction work zone(s) is maintained. At a minimum, the plan shall include the following:

- Time and day of street closures;
- Proper warning and posted signage regarding street closures;
- Provision of driveway access plan to ensure safe vehicular, pedestrian, and bicycle movements;
- Safe and efficient access routes for emergency vehicles;
- Provisions for pedestrian safety;
- Use of manual traffic control when necessary;
- Number of anticipated truck trips, and time of day of arrival and departure of trucks;
- Provision of a truck circulation pattern and staging area with a limitation on the number of trucks that can be waiting and any limitations on the size and type of trucks appropriate for the surrounding transportation network.

The plan must be available at the site for inspection by the City representative during all work. With the implementation of the traffic control plan, local roadways and freeway facilities will continue to operate at acceptable operating conditions and the impact of the project would be **less than significant**.

With the addition of the proposed project, all study intersections and roadway segments would be anticipated to function at LOS C, or better. Therefore, the impact of the proposed project on existing roadways would 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 Master EIR, and the project is consistent with the general plan land use designation. State Route 160 is located approximately 100 feet north of the project site; the only segment of State Route 160 that was assessed in the Master EIR 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.

Off-site vehicle queuing was considered for the critical movements at the study intersections. The calculated vehicle queues were compared to actual vehicle storage/segment lengths. As presented in Table 7, the calculated vehicle queues are less than the available storage with the exception of the northbound left and westbound left movements at the Leisure Lane intersection with Exposition Boulevard/ SR-160 Eastbound Ramps (Intersection #2). The northbound left-turn and westbound left-turn queues exceed the available storage under Existing (2018) Conditions. The addition of the project increases both the northbound left-turn and westbound left-turn queues by less than one vehicle length. Ninety-five percent of the time during peak-hours, the vehicle queuing will be less than or equal to those reported. The proposed project would not significantly 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 would not adversely affect existing or planned transit operations. The project would not add noticeable transit demand. Any additional demand is anticipated to be adequately accommodated by the existing/planned transit system. The impacts of the project are considered to be **less than significant**. Accordingly, no mitigation is required.

Questions E and F

As discussed above, there are some existing and planned bicycle facilities in the vicinity of the project site. While the project would not result in removal of any existing or planned pedestrian facility or bikeway/bike lane, the project will add pedestrian and bicycle demand within the project site and to the nearby vicinity. The increased demand for pedestrian and bicycle facilities would be considered **potentially significant**. The project will include pedestrian access to the project site via the Leisure Lane and Expo Parkway frontages and will include pedestrian and bicycle facilities internal to the site, as required by code for the proposed use. The project will incorporate **Mitigation Measure T&C-1** to mitigate potential impacts to bicycle and pedestrian access to a **less than significant** impact.

Mitigation Measures

Mitigation Measure T&C-1:

The project applicant shall pay a fair share contribution for impacts to bicycle and pedestrian access to the City of Sacramento or construct equivalent improvements consistent with City standards.

Findings

All additional significant environmental effects of the project relating to Transportation and Circulation can be mitigated to a less-than-significant level.

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

Environmental Setting

Wastewater and Stormwater

Wastewater would be collected by the City’s sewer system. The project site is located in an area with separated pipes for sewer and storm water drainage. Wastewater generated in the vicinity of the project is collected by the wastewater system pipes and conveyed to a treatment plant in Elk Grove to be treated and released back to local rivers. The treatment is performed by the Sacramento Regional County Sanitation District³⁴

Water Supply

Water service for the proposed 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, and the E.A. Fairbairn Water Treatment Plant (FWTP), located at the northeast corner of State University Drive South and College Town Drive. The FWTP and 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 2016 (the 2015 UWMP) 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 until 2040. Based, in part, on these projections, the City proposes sufficient water supply entitlements and treatment capacity during normal, dry, and multiple dry years to meet the demands of its customers up to the year 2040.

Solid Waste Disposal

Commercial solid waste materials collected by the Solid Waste Division of the City Department of Public Works 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

³⁴ City of Sacramento Stormwater Program Management. 2016. Available: <https://www.cityofsacramento.org/Utilities/Stormwater>. Accessed May 1, 2018.

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 Master EIR and Applicable General Plan Policies

The Master EIR 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 Master EIR 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 Master EIR concluded that the potential increase in demand for potable water in excess of the City's existing diversion and treatment capacity, and which could require construction of new water supply facilities, would result 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 effect (Impact 4.11-4). Impacts on solid waste facilities were less than significant (Impact 4.11-5). 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 would include a 139,482-square foot self-storage facility; an approximately 170-unit senior apartment building; an 80,000-square foot, five story, 120 room hotel; and a 50,000-square foot single-story retail building. Existing distribution mains include a 12-inch distribution main, which runs in an east-west direction along Expo Parkway in the existing right-of-way and connects to existing distribution mains in Leisure land and Expo Boulevard and an 8-inch water main, which runs in an east west direction along Leisure Lane in the existing right-of-way connects the mains from Expo Boulevard and Leisure Lane at Canterbury Road. The on-site water conveyance system for the proposed project would connect to these water pipelines for water conveyance.

The projected water demand from the proposed project was accounted for in the City's 2035 General Plan and Master EIR, as the project is consistent with the General Plan land use designation, and intensification of use at the project site was anticipated under the General Plan. The Master EIR concluded that the City's existing water right permits and United States Bureau of Reclamation (USBR) contract are sufficient to meet the total water demand projected for buildout of the proposed 2035 General Plan, including the proposed project site. In addition, according to the 2015 Sacramento Urban Water Management Plan (UWMP), the City's water supply would be well below the City's water demand during a multiple-dry year in 2020, 2025, 2030, 2035, and 2040. During a drought year in 2035 (2035 General Plan planning horizon), the City's water yearly supply is expected to be 249,419 acre feet (AFY), while the City's yearly water demand would be 149,213 AFY; it is anticipated that there would be a 145,206 AFY surplus of water supply in the year 2035 during drought (UWMP 2015). The City would have adequate capacity of water supply at buildout of the 2035 General Plan, and the proposed project is consistent with the 2035 General Plan. Thus, the project would have a **less than significant** impact related to water supply.

Wastewater and Stormwater

The proposed project would include a 139,482-square foot self-storage facility; an approximately 170-unit senior apartment building; an 80,000-square foot, five story, 120 room hotel; and a 50,000-square foot single-story retail building. The proposed project would utilize existing storm drainage features. An existing 30-inch storm drain runs south from Leisure lane, along proposed parcel one and parcel two to the southern property line between parcels one and three. The 24-inch drain connects to an existing 66-inch storm drain that runs in an east-west direction along Expo Parkway. The project proposes to construct a new 12-inch to 24-inch storm drain along parcel 4 to connect to an existing 54-inch storm drain that is located north east of the site and runs north-south, under Leisure Lane. It is anticipated that rainfall would be diverted from building surfaces to the storm drains.

During construction of the project, the project applicant would be required to comply with the State "NPDES General Permit for Stormwater Discharges Associated with Construction Activity" (State Permit). To comply with the State Permit, the applicant would file a Notice of Intent with the State Water Resources Control Board and prepare a Stormwater Pollution Prevention Plan (SWPPP) prior to construction. The SWPPP would be reviewed by the Department of Utilities prior to the issuance of a grading permit or approval of improvement plans to assure the following items are included: 1) vicinity map, 2) site map, 3) list of potential pollutant sources, 4) type and location of erosion and sediment BMPs, 5) name and phone number of person responsible for SWPPP, and 6) signed certification page by property owner or authorized representative. Post-construction stormwater quality control measures would be required to minimize the increase of urban runoff pollution caused by development of the area. Source control and onsite treatment measures would be required (refer to "Stormwater Quality Design Manual" May 2007 for appropriate source control measures).

The City is responsible for maintaining its stormwater and wastewater collection system and ensuring adequate capacity for build out of the 2035 General Plan. As previously described, the proposed project is consistent with the land use envisioned in the General Plan, and the potential impacts to stormwater and wastewater facilities were contemplated in the General Plan MEIR. The project would result in a **less than significant** impact on stormwater and wastewater facilities.

Solid Waste

As described above, the proposed development would be considered commercial and multi-family residential, and thus served by private haulers franchised by the Sacramento SWA. To determine the amount of solid waste that could be generated by the proposed project, this analysis mirrors the analysis used in the 2035 General Plan Master EIR. The analysis uses information provided by both the City of Sacramento as well as the CIWMB. The business rate was taken from data provided by CIWMB and is a conservative estimate of all employment (retail, office, industrial) anticipated to be developed within the General Plan Policy Area. This would be a conservative estimate of solid waste generation. The following solid waste generation rates are used for the analysis:

- Residential = 1.1 tons/unit/year
- Employment (retail, office, industrial) = 10.8 lbs/employee/day

The proposed project would generate approximately 811 tons of solid waste per year from its occupants. **Table 16** displays the projected solid waste generation.

TABLE 16: EMPLOYEE/ RESIDENT SOLID WASTE GENERATION RATES

Proposed Use	Residential Units	Generated Solid Waste	Estimated Number of Employees	Generated Solid Waste (lbs per day/2,000 lbs/ton x 365 days)	Total Generated Solid Waste
Senior Apartments	170	187 tons per year	20±	39 tons per year	226 tons per year
Hotel	120	132 tons per year	40±•	78.84 tons per year	211 tons per year
Retail	N/A	N/A	165±*	325 tons per year	325 tons per year
Self-Storage	N/A	N/A	3±	6 tons per year	6 tons per year
* Assumes mix of community-serving retail uses; employment projections based on employee generation rates by zone. Sacramento City Code Section 17.700.050 (3.3 Employees per 1,000 gsf) *Number of employees based on project estimates.				<u>Total Solid Waste</u>	<u>811 tons per year</u>

As growth continues in the region, in accordance with the County General Plan and city general plans, population would increase and the solid waste stream would continue to grow.

Implementation of the Solid Waste Authority and Sacramento recycling requirements would continue to significantly reduce potential cumulative impacts on landfill capacity.

Because the project was accounted for in the City’s General Plan and Master EIR, and 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 senior apartments, self-storage facility, hotel, and retail uses. 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

The project site contains existing underground water, sanitary sewer, and storm drain facilities that tie in to the City’s utility systems. As part of the proposed project, the existing on-site underground utilities would be removed and replaced with a project-specific utility design. New underground utilities would be

installed and would tie-in to the existing facilities in the utility easement along the northern and southern project site boundaries.

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 applicable 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
14. MANDATORY FINDINGS OF SIGNIFICANCE			
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

QUESTIONS A

As discussed in the Biological Resources and Cultural Resources section of this Initial Study, the proposed project would result in potentially significant impacts as a result of project construction on nesting birds. However, adoption and implementation of mitigation measures described in this Initial Study would reduce these individual impacts to less-than significant levels.

Construction of the proposed project could result in vibration or noise impacts to nesting Swainson's hawks in nearby trees. The loss of active nests or loss of individuals as a result of construction is a **potentially significant** impact. Implementation of Mitigation Measure BIO-1 would reduce these impacts to **less than significant**.

Construction of the proposed project could result in the inadvertent discovery of undocumented archaeological materials or human remains, and/or the disturbance or destruction of a known historical or archaeological resource. Therefore, the project could result in **potentially significant** cultural resource impacts. Implementation of Mitigation Measures CUL-1 through CUL-3 described above would reduce the impacts to a **less than significant level**.

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

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 addition of a 139,482-square foot self-storage facility; an approximately 170-unit senior apartment building; an 80,000-square foot, five story, 120 room hotel; and a 50,000-square foot single-story retail building. The project would not affect population growth either directly or indirectly beyond that which was analyzed in the City's 2035 General Plan Master EIR. Implementation of the Master EIR and project-specific mitigation measures proposed in this Initial Study would reduce the project's impacts to a **less than significant level**, further reducing the project's contribution to environmental impacts to less than cumulatively considerable.

Question C

With implementation of 2035 General Plan Master EIR and project-specific mitigation measures for seismic hazards and noise and vibration impacts identified in this initial study, the proposed project would not have a substantial adverse effect on human beings, either directly or indirectly. Adoption and implementation of **Mitigation Measures NOI-1 through NOI-2** would reduce potential noise impacts, including vibration impacts, to a **less than significant level**.

SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

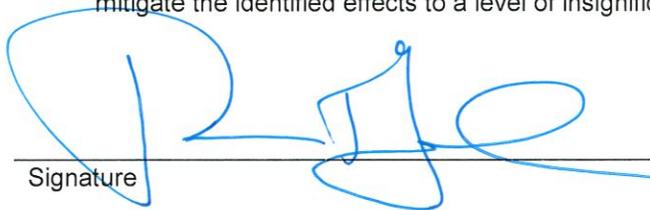
The environmental factors checked below would potentially be affected by this project.

	Aesthetics		Hazards
	Air Quality	X	Noise
X	Biological Resources		Public Services
X	Cultural Resources		Recreation
	Energy and Mineral Resources	X	Transportation/Circulation
	Geology and Soils		Utilities and Service Systems
	Hydrology and Water Quality		
	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 Master EIR; (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 Master EIR are adequate for the proposed project; and (d) the proposed project will have additional significant environmental effects not previously examined in the Master EIR. A Mitigated Negative Declaration will be prepared. Mitigation measures from the Master EIR 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 July 17, 2018

Tom Burford, Principal Planner
Printed Name

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