Todd Smith, Planning Director

Planning and Environmental Review



Troy Givans, Director

Department of Community

Development

County of Sacramento

Mitigated Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Mitigated Negative Declaration re: The Project described as follows:

- 1. Control Number: PLNP2023-00255
- 2. Title and Short Description of Project: Vintage Park Wireless Communication Facility

The project consists of the following entitlement requests:

- A Conditional Use Permit to allow a wireless communication facility (WCF) in the Agricultural Holding Zone (A-10) zoning district.
- 2. A Special Development Permit to allow the proposed project to deviate from the following development standards:
 - <u>Maximum Height (Section 3.6.7.A, Table 3.6.2):</u> Maximum height allowed for a new Group 1 WCF is 55 feet. As proposed, the WCF would be 90 feet.
 - <u>Separation- Group 1 Zone Property- Minimum (Section 3.6.7.A, Table 3.6.2):</u> Three times height of tower, for this project would be 270 feet. As proposed, the separation from Group 1 zoned properties to the north and east would be 25 feet.
- 3. A Design Review to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

The project proposes to construct an unmanned telecommunication facility consisting of one 35'x35' lease area totaling approximately 1,225 square feet. The facility would include a 90' monoeucalyptus tower, panel antennas, remote radio units, and surge protectors.

Sub-surface construction for telecommunication pads typically includes surface grubbing, grading, trenching and at least 30' auguring below surface level (bsl) for monopole placement. The project may also include 1 to 3 foot-deep trenching for fiber line placement. All grading/trenching would be outside of tree driplines.

- 3. Assessor's Parcel Number: 115-0092-004
- 4. Location of Project: The project site is located within the Florin-Vineyard Community Plan on a residential parcel at 7991 Sunnyside Way approximately 250 feet east of Sunnyside Way in the eastern part of the property. The project is approximately 410 feet north of Cord Way and approximately 370 feet south of Carlisle Avenue in the Vineyard community of unincorporated Sacramento County
- 5. Project Applicant: AT&T Mobility
- 6. Said project will not have a significant effect on the environment for the following reasons:
 - a. It will not 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.

- b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
- c. It will not have impacts, which are individually limited, but cumulatively considerable.
- d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.
- **7.** As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.
- 8. The attached Initial Study has been prepared by the Sacramento County Planning and Environmental Review Division in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Planning and Environmental Review Division at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

Julie Newton

Environmental Coordinator County of Sacramento, State of California

COUNTY OF SACRAMENTO PLANNING AND ENVIRONMENTAL REVIEW INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2023-00255

NAME: Vintage Park Wireless Communication Facility

LOCATION: The project site is located within the Florin-Vineyard Community Plan on a residential parcel at 7991 Sunnyside Way approximately 250 feet east of Sunnyside Way in the eastern part of the property. The project is approximately 410 feet north of Cord Way and approximately 370 feet south of Carlisle Avenue in the Vineyard community of unincorporated Sacramento County (Plates IS-1 and IS-2).

ASSESSOR'S PARCEL NUMBER: 115-0092-004

OWNER: Alfonso Garcia

8267 Dillard Road Wilton, CA 95693

APPLICANT: AT&T Mobility

5001 Executive Parkway San Ramon, CA 94583

Representative: 51 Wireless, LLC

4930 Pacific Street Sacramento, CA 95677

PROJECT DESCRIPTION

The project consists of the following entitlement requests:

- 1. A **Conditional Use Permit** to allow a wireless communication facility (WCF) in the Agricultural Holding Zone (A-10) zoning district.
- 2. A **Special Development Permit** to allow the proposed project to deviate from the following development standards:
 - Maximum Height (Section 3.6.7.A, Table 3.6.2): Maximum height allowed for a new Group 1 WCF is 55 feet. As proposed, the WCF would be 90 feet.

- Separation- Group 1 Zone Property- Minimum (Section 3.6.7.A, Table 3.6.2):
 Three times height of tower, for this project would be 270 feet. As proposed, the separation from Group 1 zoned properties to the north and east would be 25 feet.
- 3. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

The project proposes to construct an unmanned telecommunication facility consisting of one 35'x35' lease area totaling approximately 1,225 square feet (Plate IS-3). The facility would include a 90' monoeucalyptus tower, panel antennas, remote radio units, and surge protectors (Plate IS-4).

Sub-surface construction for telecommunication pads typically includes surface grubbing, grading, trenching and at least 30' auguring below surface level (bsl) for monopole placement. The project may also include 1 to 3 foot-deep trenching for fiber line placement. All grading/trenching would be outside of tree driplines.

ENVIRONMENTAL SETTING

The project site is a flat, 2.5 acre parcel developed with two, single-family residences, associated landscaping and two storage containers. There is a large, disturbed area east of the northern residence. There are other small shed structures east of the residences within the fenced area of the property. The parcel and homes are served by a well (between the two residences). Access to the site is via two driveways off of Sunnyside Way. The eastern portion of the property is fenced off from the western portion and contains open grass land. There are overhead electrical utilities along the eastern side of Sunnyside Way and a single utility pole extends into the parcel to serve the homes.

The uses surrounding the project site contain homes on large lots or open land to the west, north and east of the site. To the south are single-family homes on smaller lots. The site is designated as Agricultural-Residential (AR) (Plate IS-5) and is zoned A-10 (Plate IS-6).

Plate IS-1: Project Location Map (2022 Aerial Photo)

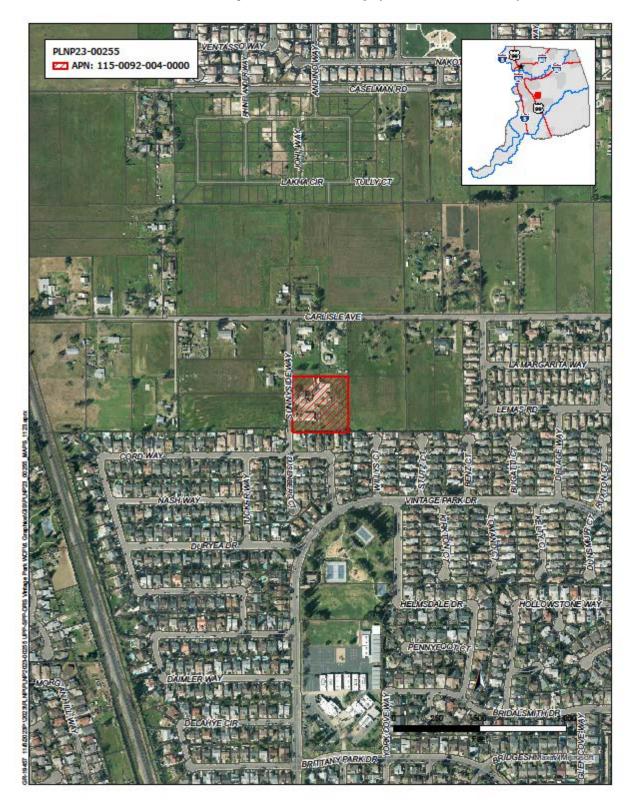


Plate IS-2: Project Map

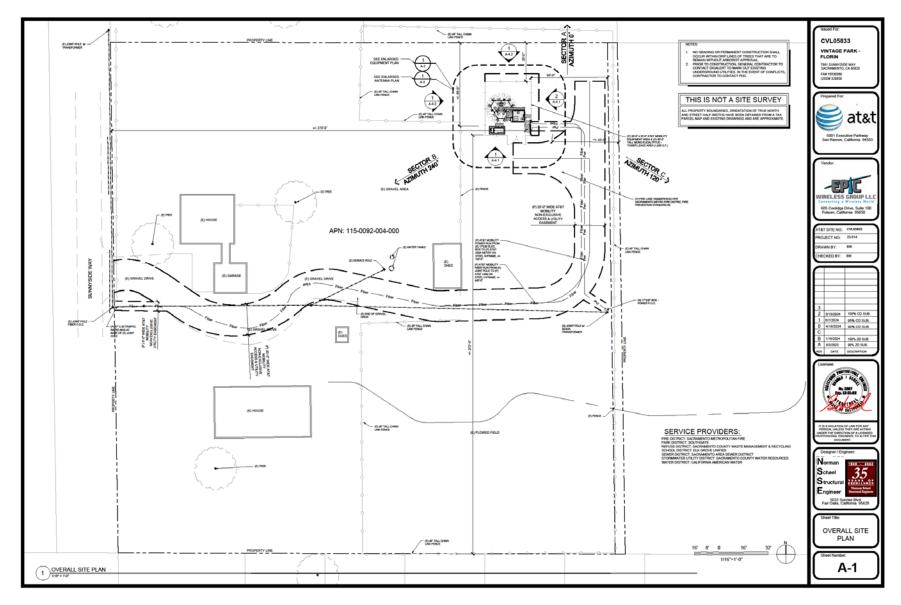


Plate IS-3: Project Layout

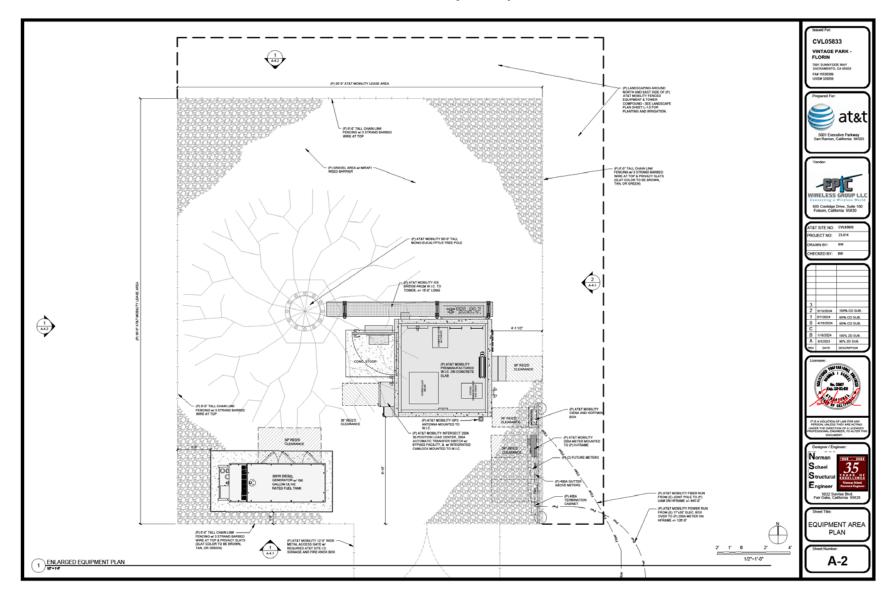


Plate IS-4: Tower view

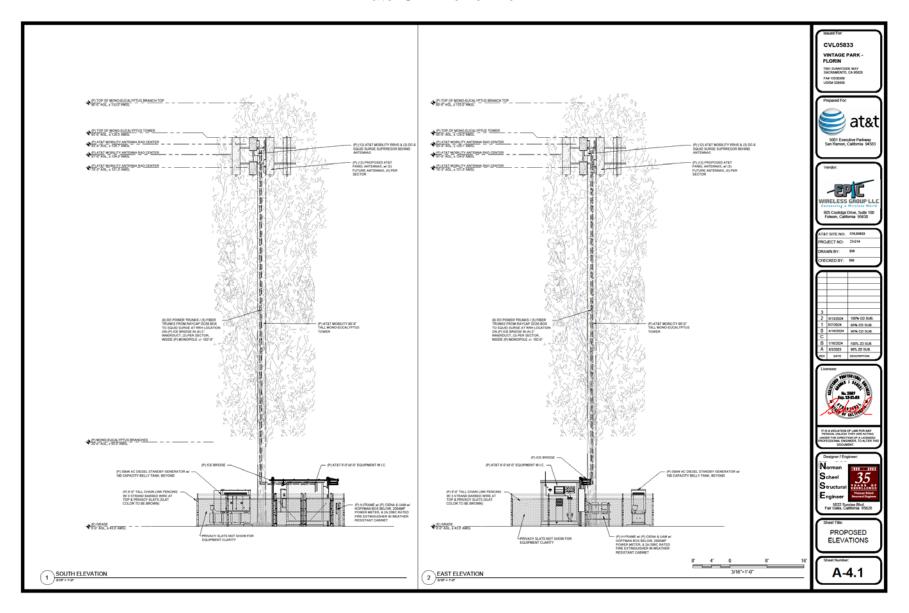


Plate IS-5: Land Use Designation

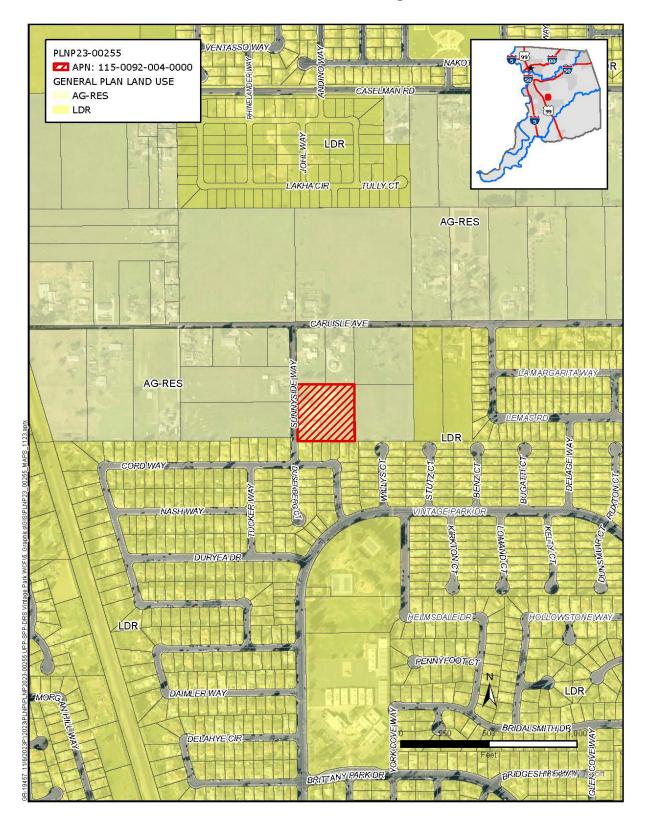
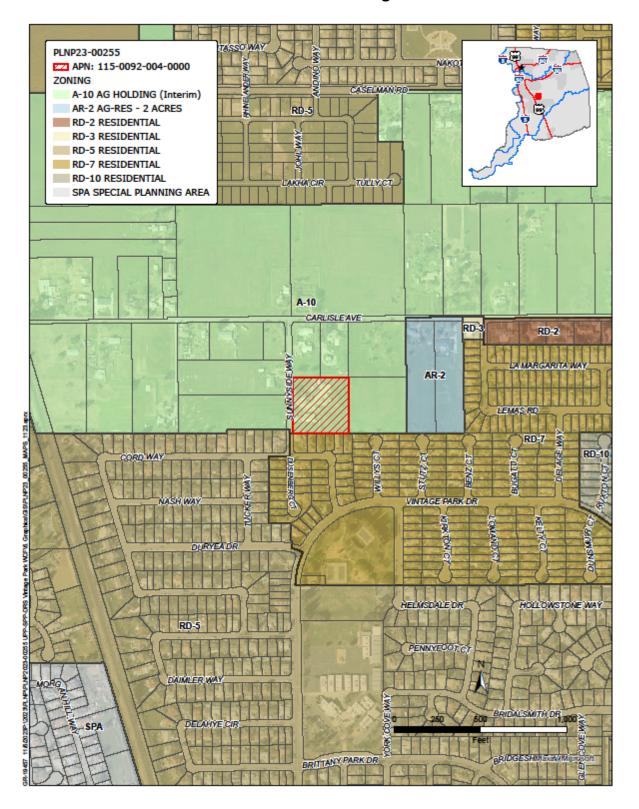


Plate IS-6: Zoning



ENVIRONMENTAL EFFECTS

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed an Initial Study Checklist (located at the end of this report). The Checklist identifies a range of potential significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

AESTHETICS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

 Substantially degrade the existing visual character or quality of the site and its surroundings.

The degree of impact of a project, either negative or beneficial, to the visual character of the area is largely subjective. Few objective or quantitative standards are available to analyze visual quality, and individual viewers respond differently to changes in the physical environment.

The 90-foot tall monoeucalyptus would be visible from the nearby residential properties. Under CEQA, an evaluation of a project's potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]). Therefore, this analysis focuses on the potential of the project to substantially degrade visual character from public viewpoints. The property is not located on a State Scenic Highway and the general vicinity does not contain a scenic vista.

Photo simulations of the project can be found in Plates IS-7 through IS-13. The equipment shelter will be located within a 35' x 35' lease area, behind a 6-foot-high chain link fence with green privacy slats. The proposed project is on an open area with residential uses in the surrounding area.

As shown in the photo simulations the monopole would be visible to motorists traveling along Sunnyside Way, Carlisle Avenue as well as Vintage Park Drive and Benz Court in the residential neighborhood to the south. The Design Review Advisory Committee (DRAC) met on June 27, 2024, and recommended the Planning Commission find the project in substantial compliance with the County's Design Guidelines. Given the existing development and utilities that are visually present in the existing viewshed of the site and surrounding residential environment, the proposed project will not have a substantial adverse effect on the existing visual character. The project is consistent with policies governing scenic resources and has been found consistent with objective County design standards. Impacts associated with aesthetics are *less than significant*.

Plate IS-7: Photo Simulation Locations



Plate IS-8: Photo Simulation 1



Plate IS-9: Photo Simulation 2



Plate IS-10: Photo Simulation 3



Plate IS-11: Photo Simulation 4



Plate IS-12: Photo Simulation 5



Plate IS-13: Photo Simulation 6



AIR QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

• Expose sensitive receptors to pollutant concentrations in excess of standards.

CRITERIA POLLUTANT HEALTH RISKS

All criteria air pollutants can have human health effects at certain concentrations. Air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS). The NAAQS and CAAQS are informed by a wide range of scientific evidence, which demonstrates that there are known safe concentrations of criteria air pollutants. Because the NAAQS and CAAQS are based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of these standards, the thresholds established by air districts are also protective of human health. Sacramento County is currently in nonattainment of the NAAQS and CAAQS for ozone. Projects that emit criteria air pollutants in exceedance of Sacramento Metropolitan Air Quality Management District's (SMAQMD) thresholds would contribute to the regional degradation of air quality that could result in adverse human health impacts.

Acute health effects of ozone exposure include increased respiratory and pulmonary resistance, cough, pain, shortness of breath, and lung inflammation. Chronic health effects include permeability of respiratory epithelia and the possibility of permanent lung impairment (EPA 2016).

HEALTH EFFECTS SCREENING

In order to estimate the potential health risks that could result from the operational emissions of ROG, NOx, PM₁₀ and PM_{2.5}, PER staff implemented the procedures within SMAQMD's Instructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools (SMAQMD's Instructions). To date, SMAQMD has published three options for analyzing projects: small projects may use the Minor Project Health Screening Tool, while larger projects may use the Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

Both the Minor Project Health Screening Tool and Strategic Area Project Health Screening Tool are based on the maximum thresholds of significance adopted within the five air district regions contemplated within SMAQMD's Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District (SMAQMD's Friant Guidance; October 2020). The air district thresholds considered in SMAQMD's Friant Guidance included thresholds from SMAQMD as well as the El Dorado County Air Quality Management District, the Feather River Air Quality Management District, the Placer County Air Pollution Control District, and the Yolo Solano Air Quality Management District. The highest allowable emission rates of NOx, ROG, PM₁₀, and PM_{2.5} from the five air districts is 82 pounds per day (lbs/day) for all four pollutants. Thus, the Minor Project Health Screening Tool is intended for use by projects that would result in emissions at or

below 82 lbs/day, while the Strategic Area Project Health Screening Tool is intended for use by projects that would result in emissions between two and eight times greater than 82 lbs/day. The Strategic Area Project Screening Model was prepared by SMAQMD for five locations throughout the Sacramento region for two scenarios: two times and eight times the threshold of significance level (2xTOS and 8xTOS). The corresponding emissions levels included in the model for 2xTOS were 164 lb/day for ROG and NOx, and 656 lb/day under the 8xTOS for ROG and NOx (SMAQMD 2020).

As noted in SMAQMD's Friant Guidance, "each model generates conservative estimates of health effects, for two reasons: The tools' outputs are based on the simulation of a full year of exposure at the maximum daily average of the increases in air pollution concentration... [and] [t]he health effects are calculated for emissions levels that are very high" (SMAQMD 2020).

The model derives the estimated health risk associated with operation of the project based on increases in concentrations of ozone and PM_{2.5} that were estimated using a photochemical grid model (PGM). The concentration estimates of the PGM are then applied to the U.S. Environmental Protection Agency's Benefits Mapping and Analysis Program (BenMAP) to estimate the resulting health effects from concentration increases. PGMs and BenMAP were developed to assess air pollution and human health impacts over large areas and populations that far exceed the area of an average land use development project. These models were never designed to determine whether emissions generated by an individual development project would affect community health or the date an air basin would attain an ambient air quality standard. Rather, they are used to help inform regional planning strategies based on cumulative changes in emissions within an air basin or larger geography.

It must be cautioned that within the typical project-level scope of CEQA analyses, PGMs are unable to provide precise, spatially defined pollutant data at a local scale. In addition, as noted in SMAQMD's Friant Guidance, "BenMAP estimates potential health effects from a change in air pollutant concentrations, but does not fully account for other factors affecting health such as access to medical care, genetics, income levels, behavior choices such as diet and exercise, and underlying health conditions" (2020). Thus, the modeling conducted for the health risk analysis is based on imprecise mapping and only takes into account one of the main public health determinants (i.e., environmental influences).

DISCUSSION OF PROJECT IMPACTS: CRITERIA POLLUTANT HEALTH RISKS

Since the project was below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Table IS-1 and Table IS-2.

Table IS-1: PM_{2.5} Health Risk Estimates

PM _{2.5} Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5- Air-District Region ³	Total Number of Health Incidences Across the 5- Air-District Region (per year) ⁴		
Respiratory		(Mean)	(Mean)				
Emergency Room Visits, Asthma	0 - 99	0.98	0.90	0.0049%	18419		
Hospital Admissions, Asthma	0 - 64	0.065	0.060	0.0032%	1846		
Hospital Admissions, All Respiratory	65 - 99	0.31	0.27	0.0014%	19644		
Cardiovascular							
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.17	0.16	0.00065%	24037		
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000082	0.000075	0.0020%	4		
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0074	0.0069	0.0022%	308		
Acute Myocardial Infarction, Nonfatal	45 - 54	0.018	0.017	0.0023%	741		
Acute Myocardial Infarction, Nonfatal	55 - 64	0.030	0.028	0.0023%	1239		
Acute Myocardial Infarction, Nonfatal	65 - 99	0.11	0.10	0.0020%	5052		
Mortality							
Mortality, All Cause	30 - 99	2.0	1.9	0.0042%	44766		

Notes:

- 1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
- Health effects are shown in terms of incidences of each health endpoint and how it compares
 to the base (2035 base year health effect incidences, or "background health incidence") values.
 Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-AirDistrict Region.
- 3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.

- 4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.
- 5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.*

Table IS-2: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5- Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.073	0.058	0.00030%	19644
Emergency Room Visits, Asthma	0 - 17	0.37	0.32	0.0054%	5859
Emergency Room Visits, Asthma	18 - 99	0.58	0.50	0.0040%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.045	0.038	0.00013%	30386

Notes:

- 1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
- 2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region.
- 3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.
- 4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.
- 5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.*

Again, it is important to note that the "model outputs are derived from the numbers of people who would be affected by [the] project due to their geographic proximity and based on average population through the Five-District-Region. The models do not take into account population subgroups with greater vulnerabilities to air pollution, except for ages

for certain endpoints" (SMAQMD 2020). Therefore, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with project implementation to specific health outcomes. While the effects noted above could manifest in individuals, actual effects depend on factors specific to each individual, including life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even if this specific medical information was known about each individual, there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects listed in the tables. Ultimately, the health effects associated with the project, using the SMAQMD guidance "are conservatively estimated, and the actual effects may be zero" (SMAQMD 2020).

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

Neither SMAQMD nor the County of Sacramento have adopted thresholds of significance for the assessment of health risks related to the emission of criteria pollutants. Furthermore, an industry standard level of significance has not been adopted or proposed. Due to the lack of adopted thresholds of significance the health risks, this data is presented for informational purposes and does not represent an attempt to arrive at any level-of-significance conclusions.

HYDROLOGY AND WATER QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

• Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rains will wash the sediment into storm drains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include, but are not limited to, vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

Sacramento County has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by Regional Water Board. The Municipal Stormwater Permit requires the County to reduce pollutants in stormwater discharges to the maximum extent practicable and to effectively prohibit non-stormwater discharges. The County complies with this permit in part by developing and enforcing ordinances and requirements to reduce the discharge of sediments and other pollutants in runoff from newly developing and redeveloping areas of the County.

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one or more acres or moving 350 cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control best management practices (BMPs) that will be implemented during construction to prevent sediment from leaving the site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

In addition to complying with the County's ordinances and requirements, construction sites disturbing one or more acres are required to comply with the State's General Stormwater Permit for Construction Activities (CGP). CGP coverage is issued by the Resources Control Board State Water (State Board) http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml and enforced by the Regional Water Board. Coverage is obtained by submitting a Notice of Intent (NOI) to the State Board prior to construction and verified by receiving a WDID#. The CGP requires preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) that must be kept on site at all times for review by the State inspector.

Applicable projects applying for a County grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components.

The project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's CGP.

Erosion controls should always be the *first line of defense*, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the *second line of defense*; they help to filter sediment out of runoff before it reaches the storm drains and local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

In addition to erosion and sediment controls, the project must have BMPs in place to keep other construction-related wastes and pollutants out of the storm drains. Such practices include, but are not limited to: filtering water from dewatering operations, providing proper washout areas for concrete trucks and stucco/paint contractors, containing wastes, managing portable toilets properly, and dry sweeping instead of washing down dirty pavement.

It is the responsibility of the project proponent to verify that the proposed BMPs for the project are appropriate for the unique site conditions, including topography, soil type and anticipated volumes of water entering and leaving the site during the construction phase. In particular, the project proponent should check for the presence of colloidal clay soils on the site. Experience has shown that these soils do not settle out with conventional sedimentation and filtration BMPs. The project proponent may wish to conduct settling column tests in addition to other soils testing on the site, to ascertain whether conventional BMPs will work for the project.

If sediment-laden or otherwise polluted runoff discharges from the construction site are found to impact the County's storm drain system and/or Waters of the State, the property owner will be subject to enforcement action and possible fines by the County and the Regional Water Board.

Project compliance with requirements outlined above, as administered by the County and the Regional Water Board will ensure that project-related erosion and pollution impacts are *less than significant*.

OPERATION: STORMWATER RUNOFF

Development and urbanization can increase pollutant loads, temperature, volume and discharge velocity of runoff over the predevelopment condition. The increased volume, increased velocity, and discharge duration of stormwater runoff from developed areas has the potential to greatly accelerate downstream erosion and impair stream habitat in natural drainage systems. Studies have demonstrated a direct correlation between the degree of imperviousness of an area and the degradation of its receiving waters. These impacts must be mitigated by requiring appropriate runoff reduction and pollution prevention controls to minimize runoff and keep runoff clean for the life of the project.

The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Source control BMPs are intended to keep pollutants from contacting site runoff. Examples include "No Dumping-Drains to Creek/River" stencils/stamps on storm drain inlets to educate the public, and providing roofs over areas likely to contain pollutants, so that rainfall does not contact the pollutants. Treatment control measures are intended to remove pollutants that have already been mobilized in runoff. Examples include vegetated swales and water quality detention basins. These facilities slow water down and allow sediments and pollutants to settle out prior to discharge to receiving waters. Additionally, vegetated facilities provide filtration and pollutant uptake/adsorption. The project proponent should consider the use of "low impact development" techniques to reduce the amount of imperviousness on the site, since this will reduce the volume of runoff and therefore will reduce the size/cost of stormwater quality treatment required. Examples of low impact development techniques include pervious pavement and bioretention facilities.

The County requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design

Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

Updates and background on the County's requirements for post-construction stormwater quality treatment controls, along with several downloadable publications, can be found at the following websites:

https://waterresources.saccounty.gov/stormwater/Pages/default.aspx

https://www.beriverfriendly.net/new-development/

The final selection and design of post-construction stormwater quality control measures is subject to the approval of the County Department of Water Resources; therefore, they should be contacted as early as possible in the design process for guidance. Project compliance with requirements outlined above will ensure that project-related stormwater pollution impacts are *less than significant*.

BIOLOGICAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community.
- Have a substantial adverse effect on riparian habitat or other sensitive natural communities.
- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies.
- Adversely affect or result in the removal of native or landmark trees.
- Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat.

BIOLOGICAL RESOURCES - REGULATORY SETTING

FEDERAL REGULATIONS

FEDERAL ENDANGERED SPECIES ACT

Pursuant to the federal Endangered Species Act (ESA) (16 U.S.C. Section 1531 et seq.), the U.S. Fish and Wildlife Service (USFWS) regulates the taking of species listed in the ESA as threatened or endangered. In general, persons subject to ESA (including private

parties) are prohibited from "taking" endangered or threatened fish and wildlife species on private property, and from "taking" endangered or threatened plants in areas under federal jurisdiction or in violation of state law. Under Section 9 of the ESA, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS has also interpreted the definition of "harm" to include significant habitat modification that could result in take.

Section 10 of the ESA applies if a nonfederal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of the ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS.

MIGRATORY BIRD TREATY ACT

The Migratory Bird Treaty Act (MBTA) prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale, purchase or barter, any native migratory bird, their eggs, parts, and nests, except as authorized under a valid permit (50 CFR 21.11.). Likewise, Section 3513 of the California Fish & Game Code prohibits the "take or possession" of any migratory non-game bird identified under the MBTA. Therefore, activities that may result in the injury or mortality of native migratory birds, including eggs and nestlings, would be prohibited under the MBTA.

STATE REGULATIONS

CALIFORNIA ENDANGERED SPECIES ACT

Pursuant to the California Endangered Species Act (CESA), a permit from California Department of Fish and Wildlife (CDFW) is required for projects that could result in the "take" of a plant or animal species that is listed by the state as threatened or endangered. Under CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species but does not include "harm" or "harass," as does the federal definition. As a result, the threshold for take is higher under CESA than under the federal ESA. Authorization for take of state-listed species can be obtained through a California Fish and Game Code Section 2081 incidental take permit.

CALIFORNIA FISH AND GAME CODE, SECTION 3503.5 – PROTECTION OF BIRD NESTS AND RAPTORS

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders *Falconiformes* and *Strigiformes*), including their nests or eggs. Typical violations include destruction of active nests as a result of tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs and/or young.

FULLY PROTECTED SPECIES UNDER THE CALIFORNIA FISH AND WILDLIFE CODE

Protection of fully protected species is described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take.

LOCAL REGULATIONS

COUNTY OF SACRAMENTO GENERAL PLAN

The Conservation Element of the Sacramento County General Plan (under Policy CO-58) currently provides protection to various ecosystems. Specifically, it "ensures no net loss of wetlands, riparian woodlands, and oak woodlands." The General Plan also seeks to protect landmark and native trees (collectively referred to as "protected trees"). "Landmark trees" are defined as ones that are "especially prominent and stately." Policies CO-137, CO-138, CO-139, CO-140, and CO-141 encourage protection and preservation of landmark and native trees. In addition, Policy CO-145 requires mitigation by creation of new tree canopy equivalent to the acreage of non-native urban tree canopy removed.

SOUTH SACRAMENTO COUNTY HABITAT CONSERVATION PLAN (SSHCP)

The SSHCP is a regional approach to addressing development, habitat conservation, and agricultural lands within the south Sacramento County region, including the cities of Galt and Rancho Cordova. The specific geographic scope of the SSHCP includes U.S. Highway 50 to the north, the Sacramento River levee and County Road J11 (connects the towns of Walnut Grove and Thornton, it is known as the Walnut Grove-Thornton Road) to the west, the Sacramento County line with El Dorado and Amador counties to the east, and San Joaquin County to the south. The SSHCP Project area excludes the City of Sacramento, the City of Folsom, the City of Elk Grove, most of the Sacramento-San Joaquin Delta, and the Sacramento community of Rancho Murieta.

The SSHCP covers 28 different species of plants and wildlife, including 10 that are state and/or federally-listed as threatened or endangered. The SSHCP has been developed as a collaborative effort to streamline permitting and protect covered species habitat.

On May 15, 2018, the Final SSHCP and EIS/EIR was published in the federal Register for a 30-day review period. Public hearings on the proposed adoption of the final SSHCP, final EIS/EIR, final Aquatic Resources Plan (ARP), and final Implementation Agreement (IA) began in August 2018, and adoption by the County occurred on September 11, 2018. The permit was received on June 12, 2019 from the U.S. Fish and Wildlife Service, July 25, 2019 from the U.S. Army Corps of Engineers, and August 20, 2019 from the California Department of Fish and Wildlife.

The proposed project is in the Urban Development Area (UDA) and considered a covered activity in the SSHCP; therefore, the Project must comply with the provisions of the SSHCP and associated permits. The analysis contained below addresses the applicability of the SSHCP, and mitigation has been designed to comply with the SSHCP.

CONSISTENCY WITH THE SOUTH SACRAMENTO COUNTY HABITAT CONSERVATION PLAN

The proposed project's design and construction must comply with all SSHCP requirements including SSHCP avoidance and minimization measures (AMMs). The

SSHCP is a habitat-based plan in which mitigation fees are based on impacts to habitat or land cover rather than impacts to individual species.

The baseline mapping for the SSHCP Landcovers is illustrated in Plate IS-14. The landcovers outlined in the baseline map are an interpretation of habitat based on remote sensing analysis over a number years prior to adoption of the SSHCP. Therefore, these landcovers are intended to serve as a guide as to what may be present on the project site and are intended to be updated. During the local impact authorization process, these landcovers will be refined, and calculation of project mitigation impact fees will be based on project specific survey.

The analysis contained in this section is consistent with the protocol for covered species analysis under the SSHCP. Compliance with the SSHCP will ensure that impacts to covered species and their habitat will be less than significant. The mitigation contained in this chapter has been structured such that the required mitigation is consistent with the adopted SSHCP mitigation and monitoring protocols.

The applicant will be required to obtain a signed SSHCP authorization form from the Environmental Coordinator for potential impacts to terrestrial and aquatic habitats. The project will comply with the requirements of the SSHCP, including adherence to the Avoidance and Minimization Measures, as well as payment of fees to support the overall SSHCP Conservation Strategy. Upon permit authorization, project is consistent with, and aids in the goals set forth in the proposed SSHCP. Impacts with regards to consistency with the proposed SSHCP are *less than significant*.

SURVEYS AND STUDIES

Environmental Assessment Specialists, Inc. (EAS) prepared a biological resources evaluation report on behalf of the applicant (Appendix A). Studies included a floristic survey and analysis of potential special-status species. EAS reviewed and analyzed a variety of data from state and federal agencies. A list of special-status species known or with potential to occur on the project site or in the immediate vicinity was developed from database queries of United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC), CDFW California Natural Diversity Database (CNDDB). Significance findings have been based on the impact conclusions of applicable surveys and studies. In absence of such published documents, the analyses rely on the general definitions of significance.

BIOLOGICAL RESOURCES- SURVEY RESULTS

The project site was surveyed on February 12, 2024, by EAS biologist. The biological resources within the site are described in terms of plant communities and jurisdictional drainage features.

An initial review indicated that the project site is located within previously disturbed areas associated within a rural residential development. EAS staff conducted the biological resources field survey to document existing conditions and to determine potential impacts to sensitive biological resources based on current site plans. The survey was conducted

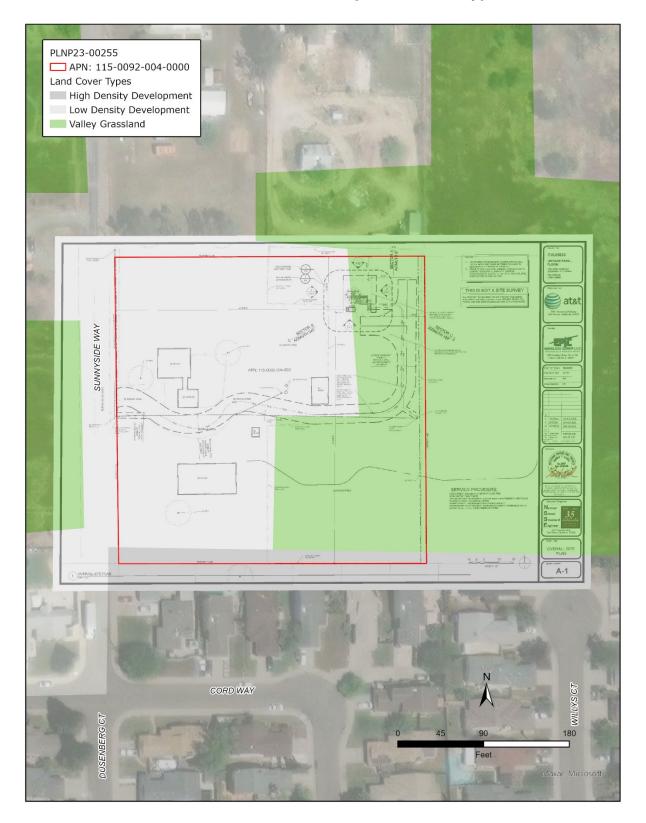
on foot taking note of biological resources, such as plant and wildlife species, and recorded on field data sheets (within EAS report). Special attention was paid to plant communities to determine the presence or potential occurrence of any special status species that may occur on the project site.

The project site is located within a previously disturbed area associated within the residential property. The proposed lease area will be developed within a fallow field that appears to be routinely disced. Vegetation on-site primarily consists of non-native grasses and ruderal (weedy) species. Ornamental trees and shrubs occur within the immediate vicinity of the project site but will not be impacted by the proposed facility. Common species observed on and within the vicinity of the site include Fan palm (*Washingtonia* sp.), queen palm (*Syagrus romanzoffiana*), pine tree (*Pinus* sp.), and brome grass (*Bromus* sp.).

The project site and surrounding area provide habitat for wildlife species that commonly occur in disturbed/developed and ornamental communities. No amphibian, reptilian, or mammalian species were observed or detected during the field survey. Avian species observed/detected include:

- House finch (Carpodacus mexicanus)
- White-crowned sparrow (Zonotrichia leucophrys)
- Domestic chickens

Plate IS-14: SSHCP Basemap Land Cover Types



SPECIAL STATUS SPECIES

Special status species are native species that have been afforded special legal or management protection because of concern for their continued existence. There are several categories of protection at both federal and state levels, depending on the magnitude of threat to continued existence and existing knowledge of population levels.

A review of the CNDDB and the California Native Plant Society's Electronic Inventory of Rare and Endangered Vascular Plants resulted in a list of 10 sensitive plant species, 27 sensitive wildlife species, and one sensitive plant community that occur within the Florin, California USGS topographic quadrangle. Reference Table IS-3 and Table IS-4 for a list of these species.

Table IS-3: Special Status Plant Species and Potential for Occurrence

Scientific Name (Common Name)	Federal Status	State Status	CRPR	SSHCP	Habitat Requirements	Potential for Occurrence
			Plants			
Blepharizonia plumosa Big tarplant			CRPR 1B.1	No	Dry hills and plains in annual grasslands, usually on slopes	Not Expected to Occur. The species was not observed within the project site and the site is not sloped
Cuscuta obtusiflora var. glandulosa Peruvian dodder			CRPR 2B.2	No	Marshes and swamps (freshwater)	Not Expected to Occur. The project site lacks habitat.
Hesperevax caulescens Hogwallow starfish			CRPR 2B.2	No	Vernal pools and other depressional wetlands	Not Expected to Occur. The site lacks vernal pools.
Downingia pusilla Dwarf Downingia			CE, CRPR 1B.2	Yes	Vernal pools and margins of lakes/ponds	Not Expected to Occur. The site lacks vernal pools or ponds.
Hibiscus lasiocarpos var. occidentalis Woolly rose-mallow			CRPR 1B.2	No	Freshwater marshes and swamps; elevation 0 – 394 ft (blooms June – Sep.) In Sacramento County, found only in the Delta.	Not Expected to Occur. The site lacks vernal pools.
Lasthenia chrysantha) Alkali-sink goldfields			CRPR 1B.1	No	Occurs in vernal pools and alkali flats.	Not Expected to Occur. The site lacks vernal pools.

Scientific Name (Common Name)	Federal Status	State Status	CRPR	SSHCP	Habitat Requirements	Potential for Occurrence
Legenere limosa Legenere			CRPR 1B.1	Yes	Vernal pools	Not Expected to Occur. The site lacks vernal pools.
Lepidium latipes var. heckardii Heckard's pepper-grass			CRPR 1B.2	No	Usually occurs in wetlands and occasionally in valley grassland.	Not Expected to Occur. No wetland habitat present or nearby. Not observed.
Sagittaria sanfordii Sanford's arrowhead			CRPR 1B.2	Yes	Emergent marsh habitat, typically associated with drainages, canals, or irrigation ditches.	Not Expected to Occur. No emergent marsh or drainage habitat present.
Trifolium hydrophilum Saline clover			CRPR 1B.2	No	Occurs in salt marshes or open, alkaline soils	Not Expected to Occur. No habitat present.

Status Codes:

CC - CDFW Candidate for Listing

CE - CDFW Endangered

CFP - CDFW Fully Protected

CRPR - California Rare Plant Rank

CSC - CDFW Species of Concern

CT - CDFW Threatened

FE - Federally Endangered

FT - Federally Threatened

FC - Candidate for Federal Listing

CR - California Rare

Table IS-4: Special Status Wildlife Species and Potential for Occurrence

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence
Invertebrates/Insects					
<i>Branchinecta lynchi</i> Vernal pool fairy shrimp	FT		Yes	Inhabit alkaline pools, ephemeral drainages, rock outcrop pools, ditches, stream oxbows, stockponds, vernal pools, vernal swales, and other seasonal wetlands. Also found in basalt flow depression pools in unplowed grasslands.	Not expected to Occur. No wetland or vernal pool habitat present
Branchinecta mesovallensis Midvalley fairy shrimp			Yes	Inhabit shallow vernal pools, vernal swales, and various artificial ephemeral wetland habitats in the Sacramento, Solano, Contra Costa, San Joaquin, Madera, Merced, and Fresno Counties.	Not expected to Occur. No wetland or vernal pool habitat present
Lepidurus packardi Vernal pool tadpole shrimp	FE		Yes	Inhabits small to large vernal pools containing clear to highly turbid water.	Not expected to Occur. No wetland or vernal pool habitat present
Linderiella occidentalis California linderiella		SA	No	A fairy shrimp which most often occupies pools that are vegetated and contain clear water. Not uncommon to observe the species in mud-bottomed pools with slightly turbid water.	Not expected to Occur. No wetland or vernal pool habitat present

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence
Fish					
Oncorhynchus mykiss irideus Central Valley steelhead	FΤ	CSC	No	Anadromous species requiring freshwater water courses with gravelly substrates for breeding. The young remain in freshwater areas before migrating to estuarine and marine environments.	Not Expected to Occur. Not within immediate watershed of Sacramento, American or Cosumnes Rivers.
Spirinchus thaleichthys Longfin Smelt	FC	ST	No	Distribution includes the Sacramento River below Rio Vista, and in the middle and lower Delta (below Medford Island).	Not Expected to Occur. Not within immediate watershed of Sacramento, American or Cosumnes Rivers.
Reptiles					
Emys marmorata Western pond turtle		CSC	Yes	Occurs in perennial ponds, lakes, rivers, and streams with suitable basking habitat (mud banks, mats of floating vegetation, partially submerged logs) and submerged shelter. Require some slack- or slowwater aquatic habitat. Nests upland, on unshaded south-facing slopes with friable soils that have a high percentage of clay or silt.	Not Expected to Occur. No wetland or ponded water present.

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence
Thamnophis gigas Giant garter snake	FT	ST	Yes	Endemic to valley floors of the Sacramento and San Joaquin Valleys. Prefers freshwater marsh and low gradient streams. Has adapted to rice	Not Expected to Occur. No aquatic habitat present.
				agriculture, drainage channels, and irrigation ditches. Requires permanent water, emergent vegetation, and upland habitat for basking and cover.	
Birds					
Accipiter cooperii Cooper's hawk		SA	Yes	Feeding: Catches small birds, especially young during nesting season, and small mammals; also takes reptiles and amphibians. Hunts in broken woodland and habitat edges; catches prey in air, on ground, and in vegetation. Often dashes suddenly from perch in dense cover and pursues prey in air through branches. Sometimes runs prey down in dense thickets. Uses cover to hide, attack, and approach prey; also soars and makes low, gliding search flights.	Moderate. The trees along the project perimeter could provide suitable perching habitat and the open agricultural fields could provide suitable foraging habitat.

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence		
Agelaius tricolor Tricolored blackbird		CT, CSC	Yes	Colonial nester in cattails, bulrush, or blackberries associated with marsh habitats.	Not Expected to Occur. No habitat present		
Ammodramus savannarum Grasshopper Sparrow		CSC	No	Occurs in dry, dense grasslands, especially those with a variety of grasses and tall forbs and scattered shrubs for singing perches. Builds nest of grasses and forbs in a slight depression in ground, hidden at base of an overhanging clump of grasses or forbs. Listed for loss of nesting/breeding habitat.	Not Expected to Occur. Not observed, unlikely to be present due to existing habitat fragmentation.		
Adrea alba Great egret			No	Associated with estuaries, rivers, and oceans, the species is known to occur along major rivers in the Central Valley. A colonial nester, the species prefers cliffs, rugged slopes, or tall trees beside water. Listed for the protection of nesting colonies.	Not Expected to Occur. No estuary, riverine or ocean habitat present.		

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Not Expected to Occur. No estuary or riverine habitat present.	
Ardea herodias Great blue heron		SA	No	Associated with estuaries, rivers, and oceans, the species is known to occur along major rivers in the Central Valley. A colonial nester, the species prefers tall trees beside water. The range is restricted to within 10 miles of the nesting area. Listed for the protection of nesting colonies.		
Athene cunicularia Burrowing owl		CSC	Yes	Frequents open grasslands and shrublands with perches and burrows. Nests and roosts in old burrows of small mammals and rubble piles. Listed for breeding habitat.	Low. Not observed. No ground burrows present, but there is forage in the area of the project site.	
Buteo regalis Ferruginous hawk		SA	Yes	Frequents open grasslands. Searches for prey from low flights over open, treeless areas and glides to intercept prey on the ground. Roosts in the open areas, usually a long tree or utility pole. Listed for preservation of wintering habitat.	Low. The grassland in the project site provides marginal foraging habitat. However, given the disturbed nature of the site and nearby development it is unlikely that the species would use the area.	

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence	
Buteo swainsoni Swainson's hawk	1	СТ	Yes	Nests in large trees, preferably in riparian areas. Forages in fields, cropland, irrigated pasture, and grassland near large riparian corridors.	Moderate. The large trees surrounding the project site represent suitable nesting habitat. The project site has marginal foraging habitat.	
Elanus leucurus White-tailed kite		CFP	Yes	Open grasslands, fields, and meadows are used for foraging. Isolated trees in close proximity to foraging habitat are used for perching and nesting.	Low. There is suitable foraging habitat; however, given the disturbed nature of the site it is unlikely that the white-tailed kite nests on or nearby.	
Falco columbarius Merlin		SA	No	Listed for loss of wintering habitat, the species will forage in open grasslands, woodlands, and coastal areas. The breeding range does not include California.	Not Expected to Occur. No habitat present	
Lanius Iudovicianus Loggerhead shrike		CSC	Yes	Listed for loss of breeding habitat, the species places nests in large shrubs or trees. Breed mainly in shrublands or open woodlands with a fair amount of grass cover and areas of bare ground.	nesting and foraging.	

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence	
Melospiza melodia Song sparrow "Modesto Population"		CSC	No	Require moderately dense vegetation to supply cover for nest sites, a source of standing or running water, semi-open canopies to allow light, and exposed ground or leaf litter for foraging.	Not Expected to Occur. No riverine or dense foliage habitat present.	
Nycticorax nycticorax Black-crowned night heron		SA	No	Found along rivers and brackish emergent wetlands, the species is a colonial nester. Nests are usually in densely foliaged trees or vine tangles. Nesting season is February to July. Listed for nesting colonies.	Not Expected to Occur. No riverine or dense foliage habitat present.	
Phalacrocorax auratus Double-crested cormorant		SA	No	Associated with estuaries, rivers, and oceans, the species is known to occur along major rivers in the Central Valley. A colonial nester, the species prefers cliffs, rugged slopes, or tall trees beside water. Range is restricted to 5 – 10 miles of the nesting area. Listed for the protection of nesting colonies.	Not Expected to Occur. No estuary or riverine habitat present.	
Mammals						

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Potential for Occurrence		
Lasiurus cinereus Hoary bat			No	Solitary species that winters along the coast and in southern California and breeds inland. Generally, roosts in dense foliage of medium to large trees.	Not Expected to Occur. The project site does not contain old large trees which would be suitable for breeding, nor is there water sources nearby.		
Lasiurus blossevillii Western red bat		CSC, WBWG H	Yes	Roosts primarily in the foliage of trees or shrubs. Day roosts are commonly in edge habitats adjacent to streams or open fields, in orchards, and sometimes in urban areas. There may be an association with intact riparian habitat. (WBWG 2022)	Moderate. Trees in and adjacent to the project site provide roosting habitat for special-status bats, such as western red bat. However, no trees are proposed for removal and the surrounding area is substantially urbanized. The proposed construction would not likely disrupt nearby roosting bats.		

Scientific Name (Common Name)	Federal Status	State Status	SSHCP	Habitat Requirements	Low. The project site provides some roosting habitat, but there are no nearby natural bodies of water or woodlands to forage in. No manmade structures will be removed for this project.	
Myotis lucifugus Little brown bat		WBWG M	No	Use a wide range of habitats and often use human-made structures for resting and maternity sites. They typically roost in caves and mines in the winter and they can be found in trees, artificial structures, bat houses, under rocks and in piles of wood in the summer. They forage primarily over streams and other bodies of water, along the margins of lakes and streams or in woodlands near water.		
<i>Myotis yumanensis</i> Yuma Myotis Bat		SA WBWG L	No	Optimal habitats are open forests and woodlands with sources of water over which to feed, but it is found in a variety of habitats. The species roosts in buildings, mines, caves, or crevices. Young are born from May to mid-June	Low. The project site provides some roosting habitat, but there are no nearby natural bodies of water or woodlands to forage in. No manmade structures will be removed for this project.	
Taxidea taxus American badger		CSC	Yes	Drier open areas with shrub, forest, and herbaceous habitats with friable soils.	Not Expected to Occur. No habitat present.	

Status Codes:
CC - CDFW Candidate for Listing

CT - CDFW Threatened

PLNP2023-00255 - Vintage Park Wireless Communication Facility Initial Study

CE - CDFW Endangered

CFP - CDFW Fully Protected

CRPR - California Rare Plant Rank

CSC - CDFW Species of Concern

CR - California Rare

FE - Federally Endangered

FT - Federally Threatened

FC - Candidate for Federal Listing

WBWG L- Western Bat Working Group Medium Threat Rank

WBWG M - Western Bat Working Group Medium Threat Rank

WBWG H - Western Bat Working Group High Threat Rank

WETLANDS AND JURISDICTIONAL WATERS

Federal and state regulation (Clean Water Act Sections 404 and 401) uses the term "surface water" to refer to all standing or flowing water which is present above-ground either perennially or seasonally. There are many types of surface waters, but the two major groupings are linear waterways with a bed and bank (streams, rivers, etc) and wetlands. The Clean Water Act has defined the term wetland to mean "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions". The term "wetlands" includes a diverse assortment of habitats such as perennial and seasonal freshwater marshes, vernal pools, and wetted swales. The 1987 Army Corps Wetlands Delineation Manual is used to determine whether an area meets the technical criteria for a wetland and is therefore subject to local, State or Federal regulation of that habitat type. This criteria is: hydrophytic vegetation, hydric soils, and wetland hydrology. The field survey found no evidence for the presence hydrophytic plant species; therefore, no further investigation into wetlands or surface waters was conducted. The proposed project will not impact wetlands or jurisdictional waters.

BIOLOGICAL RESOURCES- IMPACTS AND ANALYSIS

SPECIAL STATUS SPECIES - PLANTS

Proposed development will include previously disturbed areas associated with the residential development but portions of the access road and the cellular communication facility itself are within the grassland area. Prior disturbance includes excavation, backfilling, and compaction activities resulting from previous construction and property activities. Evidence of surface disturbance on and in the immediate vicinity of the site has greatly reduced the potential for sensitive plant species to occupy the area. Therefore, none of the above-listed sensitive plant species are anticipated to occur onsite. Impacts to sensitive plant species are *less than significant*.

SPECIAL STATUS SPECIES - WILDLIFE SPECIES

The SSHCP permit strategy relies on the USFWS biological opinion (BO) that includes all future SSHCP covered activities requiring a CWA 404 permit, eliminating the need for individual project-by-project consultations under ESA Section 7. Compensatory mitigation for the loss of valley grassland habitat is satisfied through the SSHCP by payment of per acreage compensatory mitigation fees for the valley grassland (or other verified habitat) land cover type.

Proposed development will be contained within previously disturbed areas near the residence and within a portion of the valley grassland habitat (see Plate IS-14). While there is a lack of habitat associated with most of the special status wildlife species listed in Table IS-4, there are trees located surrounding the area of the project site which may serve as nesting sites for raptors and migratory birds. The species discussions below focus on those special status species that have probability to occur with the valley grassland land cover.

The project proponent would seek incidental take coverage for impacts to special-status species through the SSHCP. Payment of the appropriate fees for impacts to habitat as well as compliance with all of the applicable AMMs contained in the SSHCP would avoid, minimize, and mitigate impacts to special-status species and their habitats that would occur as a result of implementing the proposed project (Appendix B). Participation in the SSHCP will ensure that project impacts are *less than significant with mitigation*.

Swainson's Hawk

The study area provides suitable foraging habitat and trees adjacent to the study area provide suitable nesting habitat for this species. Additionally, the study area is located within SSHCP modeled foraging habitat for this species. The nearest documented occurrence of this species is approximately two miles to the southwest and southeast. Therefore, this species could occur within the study area.

Implementation of AAMs SWHA-1 — SWHA-4 of the SSHCP would be followed to avoid potential impacts to Swainson's hawk. SWHA-1 would be required if modeled habitat for Swainson's hawk is present within a covered activity's project footprint, or within 0.25 mile of a project footprint, and includes an approved biologist conducting a survey to determine if existing or potential nesting sites are present within the project footprint and adjacent areas within 0.25 mile of the project footprint. Adjacent parcels under different land ownership would be surveyed only if access is granted or if the parcels are visible from authorized areas. Nest sites are often associated with riparian land cover, but also include lone trees in fields, trees along roadways, and trees around structures. The third-party project proponent would map all existing and potential nesting sites and provide these maps to the County. Nesting sites would also be noted on plans that would be submitted to the County.

SWHA-2 consists of pre-construction surveys by an approved biologist for nesting Swainson's hawk within the project footprint, and a 0.25-mile buffer of the project footprint, if construction would occur during the active breeding season (March 1 through September 15). Pre-construction surveys would include two site visits within 30 days and 3 days prior to ground disturbing activities. If a nest is encountered during the pre-construction survey, then SWHA-3 and SWHA-4 would be implemented, which includes the establishment of a 0.25-mile construction buffer and biological monitoring of active nests until the young have fledged, or the nest is determined to be inactive. Payment of fees for impacts to valley grassland habitat and trees will mitigate for loss of potential foraging and nesting habitat for this species.

NESTING RAPTORS AND BIRDS OF PREY

Raptors within the Sacramento region include tree-nesting species such as Cooper's hawk, red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as "special animals" due to concerns over nest disturbance: Cooper's hawk, sharp-shinned hawk, northern harrier, and white-tailed kite.

The project vicinity contains numerous mature trees that could serve as suitable habitat for nesting raptors. Implementation of AAMs RAPTOR-1 – RAPTOR-4 of the SSHCP

would be required to avoid potential impacts to nesting raptors and birds of prey. RAPTOR-1 is required if modeled habitat for a covered raptor species is present within a Covered Activity's project footprint, or within a 0.25-mile buffer of the project and includes surveys by an approved biologist to determine if potential nesting sites are present within or near the project site. Adjacent parcels under different land ownership would be surveyed only if access is granted or if the parcels are visible from authorized areas. RAPTOR-2 consists of pre-construction surveys to determine if active nests are present within the project footprint or within 0.25 mile of the project footprint. Pre-construction surveys would include two site visits within 30 days and 3 days prior to ground disturbing activities. If a nest is encountered during the pre-construction survey, then RAPTOR-3 and RAPTOR-4 would be implemented, which includes the establishment of a 0.25-mile construction buffer and biological monitoring of active nests until the young have fledged, or the nest is determined to be inactive. Payment of fees for impacts to valley grassland habitat and protected trees subject to removal would mitigate for loss of potential foraging and nesting habitat for these species.

MIGRATORY BIRDS

The project site contains a number of mature trees that could serve as suitable habitat for migratory birds. If present, migratory birds can be disturbed by construction equipment if appropriate measures are not taken. To avoid take of nesting migratory birds, mitigation has been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. Impacts to migratory birds are *less than significant with mitigation*.

CULTURAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Cause a substantial adverse change in the significance of a historical resource.
- Have a substantial adverse effect on an archaeological resource.
- Disturb any human remains, including those interred outside of formal cemeteries.

Under CEQA, lead agencies must consider the effects of projects on historical resources and archaeological resources. A "historical resource" is defined as a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant (Section 15064.5[a] of the Guidelines). Public Resources Code (PRC) Section 5042.1 requires that any properties that can be expected to be directly or indirectly affected by a proposed project be evaluated for CRHR eligibility. Impacts to historical resources that materially impair those characteristics that convey its historical significance and justify its inclusion or eligibility for the NRHP or CRHR are considered a significant effect on the environment (CEQA guidelines 15064.5)).

In addition to historically significant resources, an archeological site may meet the definition of a "unique archeological resource" as defined in PRC Section 21083.2(g). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, mitigation measures shall be required (PRC Section 21083.2 (c)).

CEQA Guidelines Section 15064.5 (e) outlines the steps the lead agency shall take in the event of an accidental discovery of human remains in any location other than a dedicated cemetery.

CULTURAL SETTING

A Cultural Resources Assessment was prepared for the project by Environmental Assessment Specialists, Inc. (EAS). The following information and analysis are based on this report.

On December 4, 2023, EAS conducted a field survey of the project site. The archaeologists walked parallel transects of five-to-seven-meter separation. The bullet-point list below summarizes the findings of the built environment and historic archaeological surveys.

 The pedestrian survey of the areas of proposed ground disturbance and the general area did not identify any precontact or historic-age cultural materials or deposits.

PROJECT IMPACTS

Although it is highly unlikely that there would be an impact to historical resources from project implementation and no additional studies are recommended, there is always the possibility that ground-disturbing activities during construction may uncover previously unknown buried cultural resources. Therefore, mitigation for inadvertent discovery of cultural resources is recommended.

The project is unlikely to impact human remains buried outside of formal cemeteries; however, if human remains are encountered during construction, mitigation is included specifying how to comply with CEQA Guidelines Section 15064.5 (e), Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code. Therefore, with mitigation, project impacts to cultural resources will be *less than significant*.

HAZARDS AND HAZARDOUS MATERIALS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

 Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials.

MICROWAVE EMISSIONS

Potential impacts associated with microwave emissions will be less than significant, per the following analysis.

PERSONAL WIRELESS SERVICE FACILITIES BACKGROUND

Three of the major types of personal wireless communication services currently in use are described below (information from the Federal Communications Commission (FCC) website at https://www.fcc.gov/wireless/wireless-services (Accessed9/3/24).

CELLULAR TELEPHONE SERVICE

Cellular telephone service is an extension of ordinary telephone services, except that it utilizes radio waves instead of wire to transmit and receive telephone calls. The cellular radiotelephone service is intended to provide customers with mobile telephone service over a broad geographic area. A cellular system operates by dividing a large geographic service area into cells and assigning the same frequencies to multiple, non-adjacent cells. This is known as "frequency reuse". When a cellular subscriber makes or receives a call, the call is connected to the nearest cell site. As a subscriber travels within a cellular provider's service area, the cellular telephone call in progress is transferred, or "handed-off", from one cell site to another without noticeable interruption. The smaller and more numerous a provider's cells are, the more it can reuse frequencies and the more users it can accommodate. In addition, all the cells in a cellular system are connected to a mobile telephone switching office (MTSO) by wireline (landline) or microwave links. The MTSO switches wireline-to-mobile and mobile-to-wireline calls between the public switched telephone network (PSTN) and the cell site. Cellular radio systems operate in the 824 – 849 MHz and 869 – 894 MHz frequency range, per FCC allocation.

PERSONAL COMMUNICATIONS SERVICES (PCS)

PCS encompasses two different licensed services offered over two different frequency bands, as well as certain unlicensed service. "Narrowband" PCS operates on frequencies in the 901 – 941 MHz range and is suitable for offering a variety of specialized services such as Messaging and two-way paging. "Broadband" PCS is similar to cellular radiotelephone service, except that PCS operates in a higher frequency band (1850 – 1990 MHz) which allows for a wider variety of communications services such as digital, voice, data and paging transmissions, over the same spectrum. Because PCS operates at a higher frequency than cellular service, PCS systems may require more antenna transmitters in the same geographic area.

WIRELESS COMMUNICATIONS SERVICE (WCS)

WCS may provide fixed, mobile, radiolocation or satellite communication services to individuals and businesses within their assigned spectrum block and geographical area. The WCS is capable of providing advanced wireless phone services which are able to pinpoint subscribers in any given locale. WCS is used to provide a variety of mobile services, including an entire family of new communication devices utilizing very small, lightweight, multi-function portable phones and advanced devices with two-way data capabilities. WCS systems are able to communicate with other telephone networks as well as with personal digital assistants, allowing subscribers to send and receive data

and/or video messages without connection to a wire. By FCC allocation, WCS operates in one of two bands: 2305 – 2320 MHz and 2345 – 2360 MHz.

ELECTROMAGNETIC FIELDS (EMFs) AND SAFETY STANDARDS

The FCC published "A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance" (June 2, 2000, hereafter called RF Guide), the purpose of which is to ensure that the antenna facilities located in communities comply with the FCC's limits for human exposure to radiofrequency (RF) electromagnetic fields. The RF Guide explains the science of RF and the electromagnetic spectrum, the exposure guidelines and rules, and explains the procedures for compliance. The FCC Office of Engineering and Technology has also published Bulletin 56 (and 65, an addendum) in 1999, which answers many common questions about RF and about exposure limits. The RF Guide and Bulletins 56 and 65 are incorporated by reference and are available for review at the Division of Planning and Environmental Review. 827 Street. Room 225, Sacramento online http://www.fcc.gov/oet/rfsafety/ (Accessed 12/13/23). The information below is based entirely upon the incorporated publications.

As discussed above, personal wireless service facilities utilize radio waves to transmit and receive telephone calls. Radio waves and microwaves are forms of electromagnetic energy that are collectively described by the term "radiofrequency" or "RF." RF emissions can be discussed in terms of "energy," "radiation" or "fields." Radiation is simply defined as the movement of energy through space in the form of waves or particles. Electromagnetic radiation is when both electric and magnetic energy move together. The term "electromagnetic field" is used to indicate the presence of electromagnetic energy at a specific location. Like any wave-related phenomenon, electromagnetic energy is described by a wavelength and a frequency. RF signals are transmitted over a wide range of frequencies. The frequency of an RF signal is expressed in terms of cycles per second, or "Hertz" (Hz).

The range of wavelengths and frequencies of electromagnetic radiation is known as the electromagnetic spectrum. The frequency of the wave corresponds to its energy: a high frequency wave has high energy. Waves with sufficient energy are "ionizing", that is, they are capable of stripping electrons from atoms and molecules, which results in a fundamental alteration of the nature of those molecules. Only very high-frequency waves, such as X-rays and gamma rays, have sufficient energy to ionize atoms and molecules. At the low-frequency end of the electromagnetic spectrum are low-energy, non-ionizing waves such as radio waves and visible light. Radiation described as non-ionizing does not have sufficient energy to alter the nature of the atoms and molecules it encounters.

Electromagnetic energy is common in the environment, resulting from numerous human-made and natural sources. Human-made sources include electrical wiring, utility lines, appliances, computers, and television and radio broadcasts. Natural sources include the human body, the earth's magnetic field, and visible light. Electric and magnetic fields produced by every-day electrical appliances, radio waves, and microwaves are low-energy – even visible light is higher energy than these sources. High-energy waves at the top of the spectrum are X-rays and gamma rays.

The rate at which an organism will absorb RF energy is specific to the type of organism – this is referred to as the specific absorption rate (SAR), defined as the power absorbed per mass of tissue (watts per kilogram). Therefore, standards for maximum safe exposure are set to limit the specific absorption rate (SAR) below a maximum permissible level as averaged over the human body. The absorption of this energy can result in thermal effects – that is, the energy produced causes heating of the tissues. At low-level RF radiation exposure, such as what is generated by appliances, cellular phones, and cellular towers, significant heating effects or health hazards are not observed.

To ensure that exposure remains well below safe limits, in August 1996 the Federal Communications Commission (FCC) adopted guidelines for evaluating the environmental effects of radio frequency emissions (FCC, (1996) Report and Order, ET Docket No. 93-62 Washington, D.C.). The guidelines effectively set a national radio frequency (RF) exposure standard based on elements of both the 1992 revision of the American National Standards Institute (ANSI) standard for RF exposure and the exposure criteria recommended by the National Council on Radiation Protection and Measurements (NCRP).

The 1996 FCC limits for maximum permissible exposure specifies two tiers of exposure criteria, one tier for "controlled environments" (usually involving occupational environments) and a second, more stringent tier for "uncontrolled environments" (usually involving the general public). The FCC limits set the allowable specific absorption rate (SAR) level from *localized* exposure (e.g., hand-held devices) at 1.6 watts per kilogram (W/kg) for the general public (uncontrolled environments), as averaged over 1 gram of tissue. The FCC recommended exposure limits for generalized exposure are summarized in Table 1 of Bulletin 56, which includes maximum power density levels for RF energy originating from communication sites (as well as other sources). The levels are determined based on continuous exposure, are dependent on the frequency which is transmitted from the site, and are usually expressed in milliwatts per square centimeter (mW/cm²).

Generally, personal wireless services such as cellular, PCS, and WCS transmit in a frequency range of 300 – 3000 MHz (megahertz). Power density limits for uncontrolled environments (i.e., general public) from transmitters in this range are calculated by dividing the frequency by 1500 (f/1500). Therefore, a facility transmitting at a frequency of 870 MHz would have a maximum recommended power density of 0.58 mW/cm². At frequencies of 1500 – 100,000MHz the maximum power density is set at 1.0 mW/cm².

REGULATORY BACKGROUND

Section 704 of the Telecommunications Act of 1996 (the "1996 Act") addresses federal, state and local government oversight of site selection for personal wireless service facilities such as towers for cellular, personal communication services, and specialized mobile radio transmitters. The 1996 Act states the following regarding a local government's jurisdiction pertaining to the environmental effects of radio frequency emissions (FCC, Wireless Telecommunications Bureau (1996), Fact Sheet #1 National Wireless Facilities Siting Policies, Washington, D.C.):

"No state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

On January 1, 1997, the new Guidelines adopted by the FCC (referred to as "the Commission" in the 1996 Act section cited above) went into effect. As discussed above, the new guidelines set a national RF exposure standard which is based on elements of both the 1992 revision of the ANSI/IEEE standard and the exposure criteria recommended by the National Council on Radiation Protection and Measurements. In addition, the updated guidelines are based on recommendations from those federal agencies responsible for health and safety, including the Environmental Protection Agency (EPA), the Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA), the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA). The FCC has stated that the updated guidelines will ensure that the public and workers are adequately protected from exposure to potentially harmful RF emissions.

PROJECT SPECIFIC INFORMATION

There are no known significant biological effects associated with cellular facilities when they are operated at or below FCC-adopted standards. At this location, the site will be leased to AT&T Mobility which is proposing a 90' monoeucalyptus that will accommodate twelve (12) panel antennas and twelve (12) RRUs (remote radio units). The applicant provided a Radio Frequency Emissions Compliance Report prepared by David H. Kiser, Registered Professional Engineer (PE) of Waterford Consultants, which included an engineering statement confirming compliance with radiofrequency radiation exposure limits (Appendix C). Waterford Consultants performed predictive modeling, following the FCC requirements, for the proposed project. The report concluded the maximum predicted power density resulting from project operations will be 31.944% of the FCC General Population limits at adjacent buildings at 8.95% of the FCC General Population limits for accessible areas at ground level. The modeling performed found that the potential RF exposures will be well below the general public limits for all publicly accessible areas at the project site and on nearby properties. No significant environmental impacts related to EMF emissions are expected as a result of this project; impacts are *less than significant*.

TOWER FAILURE

Communication towers are manufactured under rigid conditions and the design and required safety factors are specified in the Uniform Building Code. The pole fabrication process is subject to independent inspection. The tower and foundation designs will be engineered to meet or exceed all requirements of the Uniform Building Code. The codes take into account the various stress loads that could be placed on the tower structure by earthquake, winds, storms, and any other combinations of high stress factors. The safety factors involved in the manufacture of these poles and their installation results in a very large margin of safety.

Accredited by the American National Standards Institute (ANSI), a Standard entitled "Structural Standards for Antenna Supporting Structures and Antennas" has been established for the design, superstructure, and foundation of telecommunication towers. This standard is designated as ANSI/TIA-222, provisions F and G, and is the governing document for telecommunication towers in the United States. The development of the standard was sponsored by the *Telecommunication* Industry Association (TIA) subcommittee TR-14.7. The key aspects discussed in the document are: modernization of the design of new towers and existing towers, definition of wind and ice load, and applicable requirements in the case of seismic activity.

DISCUSSION

The "fall drop zone" (radius of tower failure) for the proposed project is estimated to be within a 60± foot radius of the tower center. The area that would be affected by potential pole collapse consists of the rear of the subject property, which is an open grassland area with no permanent structures or parking spaces. With the monoeucalyptus being located at the rear of the property, all adjacent properties are also located within the "fall drop zone". This area consists of residential backyards with trees/vegetation and shed structures as well as common open space areas with trees/vegetation near utility lines. No residential structures occur within the potential fall zone of the tower.

The applicant provided a certified structural letter of the proposed monoeucalyptus, signed by Jacob Proctor, Registered P.E. of Solar Communication International, Inc. (SCI) (Appendix D). Monopole failure has the potential to impact the existing cargo storage containers, trees/vegetation/fencing located along adjacent property boundaries, and sheds or structures located within residential backyards of adjacent properties. However, as the monopole is an engineer-designed structure that will comply with the safety factors specified in the Uniform Building Code, monopole failure is considered extremely unlikely. Potential impacts as a result of monopole collapse are therefore considered *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures (A, B, C, D, and E) are critical to ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur: (1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

As the applicant, or applicant's representative, for this project, I acknowledge that project development creates the potential for significant environmental impact and agree to implement the mitigation measures listed below, which are intended to reduce potential impacts to a less than significant level.

Applicant	 Date:

MITIGATION MEASURE A: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

The following Basic Construction Emissions Control Practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by SMAQMD Rule 403 and enforced by SMAQMD staff. Prior to issuing grading or construction permits the County shall verify the following measures are specified on construction contracts and/or construction documentation.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 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.
- Minimize idling time by either shutting equipment off when not in use or reducing time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- 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.

MITIGATION MEASURE B: PARTICIPATION IN THE SSHCP

To compensate for impacts to valley grassland and potential impacts associated with special-status species and biological communities, the applicant shall obtain authorization through the SSHCP and conform with all applicable Avoidance and Minimization Measures (Appendix B), as well as payment of fees necessary to mitigate for impacts to species and habitat prior to construction.

Special-status species and biological communities include:

- Swainson's Hawk
- Cooper's Hawk

- Western red bat
- Valley Grassland

MITIGATION MEASURE C: MIGRATORY BIRD NEST PROTECTION

To avoid impacts to nesting migratory birds the following shall apply:

- 1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and August 31, a survey for active migratory bird nests shall be conducted no more than 14 days prior to construction by a qualified biologist.
- Trees slated for removal shall be removed during the period of September through January, in order to avoid the nesting season. Any trees that are to be removed during the nesting season, which is February through August, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.
- 3. If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which has been determined by a qualified biologist, shall be established and maintained around the nest to prevent nest failure. All construction activities shall be avoided within this buffer area until a qualified biologist determines that nestlings have fledged, or until September 1.

MITIGATION MEASURE D: UNANTICIPATED DISCOVERY OF CULTURAL RESOURCES

In accordance with PRC Section 21082 and Section 15064.5 of the CEQA Guidelines and [36 CFR 800] of Section 106 of the National Historic Preservation Act (NHPA), if buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the lead agency concerning appropriate measures that will be implemented to protect the resources, including but not limited to excavation and evaluation of the finds, consistent with Section 15064.5 of the CEQA Guidelines and 36 CFR 800. Cultural resources could consist of but are not limited to stone, bone, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. In accordance with PRC Section 21082 and Section 15064.5 of the CEQA Guidelines, no further grading or construction activity shall occur within 50 feet of the discovery until the lead agency approves the measures to protect these resources.

In addition, reasonable efforts to avoid, minimize, or mitigate adverse effects to the property shall be taken and the State Historic Preservation Office (SHPO) and Indian tribes with concerns about the property, and the Advisory Council on Historic Preservation (Council) will be notified within 48 hours in compliance with 36 CFR 800.13 (b)(3).

MITIGATION MEASURE E: UNANTICIPATED DISCOVERY OF HUMAN REMAINS

In the event of an accidental discovery or recognition of any human remains, PRC Section 5097.98 shall be followed. Once project-related earthmoving begins and if there is a discovery or recognition of human remains, the following steps shall be taken:

- 1. There shall be no further excavation or disturbance of the specific location or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains are Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in PRC Section 5097.98, or
- 2. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendent or on the project area in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission;
 - The descendent identified fails to make a recommendation; or
 - The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for this project as follows:

- 1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is \$3,400.00. This fee includes administrative costs of \$1,103.00.
- 2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no

encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by the California Environmental Quality Act as follows:

- 1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.
- 2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.
- 3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
LAND USE - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			Х		The project is consistent with environmental policies of the Sacramento County General Plan, Florin-Vineyard Community Plan, and Sacramento County Zoning Code.
b. Physically disrupt or divide an established community?				Х	The project will not create physical barriers that substantially limit movement within or through the community.
2. POPULATION/HOUSING - Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			Х		The project will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?			Х		The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. AGRICULTURAL RESOURCES - Would the pro	oject:				
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				Х	No Williamson Act contracts apply to the project site.
c. Introduce incompatible uses in the vicinity of existing agricultural uses?			Х		While the project occurs in an area of Agricultural-Residential uses, it would not introduce an incompatible use to surrounding agricultural uses.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
4. AESTHETICS - Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?			Х		The project does not occur in the vicinity of any scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?				Х	The project is not located in a non-urbanized area.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity. Refer to the Aesthetics discussion above.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			Х		The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.
5. AIRPORTS - Would the project:					
Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				Х	The project occurs outside of any identified public or private airport/airstrip safety zones.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				Х	The project occurs outside of any identified public or private airport/airstrip noise zones or contours.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				Х	The project does not affect navigable airspace.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				Х	The project does not involve or affect air traffic movement.

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
6.	PUBLIC SERVICES - Would the project:					
a.	Have an adequate water supply for full buildout of the project?				X	The completed project will not require water services.
b.	Have adequate wastewater treatment and disposal facilities for full buildout of the project?				X	The project will not require wastewater services.
C.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			Х		The Kiefer Landfill has capacity to accommodate solid waste until the year 2050.
d.	Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?				Х	The project will not require construction or expansion of new water supply, wastewater treatment, or wastewater disposal facilities.
e.	Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?				Х	Project construction would not require the addition of new stormwater drainage facilities.
f.	Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			Х		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g.	Result in substantial adverse physical impacts associated with the provision of emergency services?			Х		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h.	Result in substantial adverse physical impacts associated with the provision of public school services?				Х	The project will not require the use of public-school services.

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
i.	Result in substantial adverse physical impacts associated with the provision of park and recreation services?				Х	The project will not require park and recreation services.
7.	TRANSPORTATION - Would the project:					
a.	Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			Х		The project will not increase vehicle trips.
b.	Result in a substantial adverse impact to access and/or circulation?				Х	No changes to existing access and/or circulation patterns would occur as a result of the project.
C.	Result in a substantial adverse impact to public safety on area roadways?				Х	No changes to existing access and/or circulation patterns would occur as a result of the project; therefore no impacts to public safety on area roadways will result.
d.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			Х		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
8. AIR QUALITY - Would the project:		_			
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			Х		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. The project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-
					and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply. The project meets the Sacramento Metropolitan Air Quality Management District's screening criteria for PM ₁₀ and PM _{2.5} and Ozone precursors and impacts are less than significant.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			Х		See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?				Х	The project will not generate objectionable odors.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
9. NOISE - Would the project:	<u>-</u>		<u>-</u>		
Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The project is not in the vicinity of any uses that generate substantial noise. However, as backup power the project will use a diesel fuel generator. Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code). While there is a generator that would be used during periods of power failure the nearest sensitive receptor is more than 150 feet away from the noise source. With sound attenuation the project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.
b. Generate excessive groundborne vibration or groundborne noise levels.			Х		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. HYDROLOGY AND WATER QUALITY - Would	the project:				
Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			Х		The project will not substantially increase water demand over the existing use.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			Х		The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?				Х	The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?				Х	The project site is not within a 100-year floodplain.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?				Х	The project is not located in an area subject to 200-year urban levels of flood protection (ULOP).
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			Х		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			Х		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			Х		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. GEOLOGY AND SOILS - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?			Х		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onor off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?			Х		The project is not located on an unstable geologic or soil unit.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?				Х	Project does not require the construction of new wastewater facilities.
e. Result in a substantial loss of an important mineral resource?				Х	The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			Х		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. BIOLOGICAL RESOURCES - Would the proje	ct:				
a. Have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			Х		No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations. See discussion of Biological Resources and potential impacts above.
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			Х		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site. See discussion of Biological Resources and potential impacts above

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
C.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				Х	No protected surface waters are located on or adjacent to the project site.
d.	Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected.
e.	Adversely affect or result in the removal of native or landmark trees?				X	No native and/or landmark trees occur on the project site, nor is it anticipated that any native and/or landmark trees would be affected by off-site improvement required as a result of the project.
f.	Conflict with any local policies or ordinances protecting biological resources?			Х		The project is consistent with local policies/ordinances protecting biological resources.
g.	Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?		Х			The project is within the Urban Development Area of the South Sacramento Habitat Conservation Plan (SSHCP). The project will need to comply with the applicable avoidance and minimization measures outlined in the SSHCP. Refer to the Biological Resources discussion in the Environmental Effects section above.
13	. CULTURAL RESOURCES - Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource?			Х		No historical resources would be affected by the proposed project.
b.	Have a substantial adverse effect on an archaeological resource?			Х		An archaeological survey was conducted on the project site. Refer to the Cultural Resources discussion in the Environmental Effects section above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Disturb any human remains, including those interred outside of formal cemeteries?			Х		No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.
14. TRIBAL CULTURAL RESOURCES - Would the	project:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			Х		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was not received. Tribal cultural resources have not been identified in the project area.
15. HAZARDS AND HAZARDOUS MATERIALS - \	Would the pr	oject:			
Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				Х	The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?				Х	The project does not involve the transport, use, and/or disposal of hazardous material.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				Х	The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?				Х	The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?				Х	The project would not interfere with any known emergency response or evacuation plan.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			Х		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
16. ENERGY – Would the project:					
Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			Х		Compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are met resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			Х		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
17. GREENHOUSE GAS EMISSIONS – Would the	project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres, and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply. The project meets the Sacramento Metropolitan Air Quality Management District's (SMAQMD) screening criteria for PM ₁₀ and PM _{2.5} and Ozone precursors. As such the potential GHG emissions would be less than the SMAQMD threshold of 1,100 metric tons of CO ₂ e. The project will not have the potential to interfere with the County meeting the goals of AB 32 (reducing greenhouse gas emissions to 1990 levels by 2020); therefore, the climate change impact of the project is considered less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			Х		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	Agricultural-Residential	Х		
Community Plan	AR-1-2	Х		
Land Use Zone	A-10	X		

INITIAL STUDY PREPARERS

Environmental Coordinator: Julie Newton

Senior Planner: Alison Little
Project Leader: Kurt Steinert
Office Manager: Kim Reading

Administrative Support: Justin Maulit

APPENDICES

Appendix A: Biological Resources Impact Analysis CVL05833, Vintage Park – Florin Sacramento, Sacramento County, California, Environmental Assessment Specialists, Inc., August 2, 2024.

Appendix B: SSHCP Avoidance and Minimization Measures

Appendix C: Waterford Consultants, David H. Kiser, Registered Professional Engineer, Radio Frequency Emissions Compliance Report. September 11, 2023.

Appendix D: Solar Communication International, Inc., Structural Calculations with Foundation Design For: 90FT MONOEUC, April 3, 2024.

These document can also be found at the Sacramento County project detail website. The direct link is:

https://planningdocuments.saccounty.net/ViewProjectDetails.aspx?ControlNum=PLNP2 023-00255