

City of **SACRAMENTO**

COMMUNITY DEVELOPMENT
DEPARTMENT

ENVIRONMENTAL PLANNING
SERVICES

300 Richards Boulevard
Third Floor
Sacramento, CA 95811

MITIGATED NEGATIVE DECLARATION

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

Self-Storage Facility on Corporate Way Project (P24-014) The proposed project consists of a request for a Rezone of the 2.27 parcel from the (OB) zone to the General Commercial Zone (C-2), a Planned Unit Development Schematic Map Amendment to reclassify 2.27 acres from office to commercial, a Conditional Use Permit to establish a mini-storage facility in the General Commercial (C-2) zone, and Site Plan and Design Review for the construction of a three-story, 152,625-square-foot mini storage building and associated site improvements.

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

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

A copy of this document and all supportive is available on the City's EIR Webpage at:

<https://www.cityofsacramento.gov/community-development/planning/environmental>

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

By: Scott Johnson

Date: October 3, 2024

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INITIAL STUDY

August 2024

A. BACKGROUND

1. Project Title: Self-Storage Facility on Corporate Way (P24-014)
2. Lead Agency Name and Address: City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
3. Contact Person and Phone Number: Ron Bess
Associate Planner
(916) 808-8272
4. Project Location: Corporate Way and Park City Drive
Sacramento, CA 85831
APN: 031-0051-019
5. Project Sponsor's Name and Address: Sacramento Corporate Way, LLC
Margo Conley and William Henry
570 Lake Cook Road, Suite 325
Deerfield, IL 60015
6. General Plan Designation: Commercial Mixed-Use
7. Existing Zoning Designation: Office Building/Executive Airport/
Planned Unit Development (OB-EA-3-PUD)
8. Proposed Zoning Designation: General Commercial/Executive Airport/
PUD (C-2-EA-3-PUD)
9. Required Approvals from Other Public Agencies: None
10. Surrounding Land Uses and Setting:

The approximately 2.27-acre site, (Assessor's Parcel Number [APN] 031-0051-019) located at the intersection of Corporate Way and Park City Drive in the City of Sacramento, is currently undeveloped and covered in ruderal grasses. The eastern portion of the site is bordered by Corporate Way, and the northern portion is bordered by Merryhill Preschool. Existing parking lots border the project site to the south and west. Surrounding existing land uses include Merryhill Preschool to the north and an apartment complex further north, across Corporate Way; office buildings and undeveloped land to the east, across Corporate Way; a church and associated parking lot to the south; a Meals on Wheels office to the southwest; and a senior community center and adult day care center to the west, across Park City Drive. The project site is zoned OB-EA-3-PUD and designated Commercial Mixed-Use by the City's 2040 General Plan. The project site is

also designated as Employment Center (Mid Rise) by the Pocket Community Plan, and is located within the Greenhaven Executive Park Planned Unit Development (PUD) area.

11. Project Description Summary:

The Self-Storage Facility on Corporate Way Project (proposed project) would include the development of a three-story, 152,625-square foot (sf) self-storage facility with an office and on-site manager's apartment. The self-storage facility would include a total of 1,323 self-storage units with 322 units on the first floor, 505 units on the second floor, and 496 units on the third floor. The units would range from 25 sf to 300 sf. A loading bay would be located along the eastern side of the building. A total of five automobile parking spaces would be provided for staff and customers. Primary site access would be provided by a new 30-foot-wide driveway off of Corporate Way and a new 20- to 25-foot-wide fire lane would provide emergency vehicle access. The proposed project would require the approval of a Rezone, a PUD Amendment to the Greenhaven Executive Park PUD Schematic Map, a Conditional Use Permit, and Site Plan and Design Review.

12. Status of Native American Consultation Pursuant to Public Resources Code Section 21080.3.1:

On June 26, 2024, formal invitations to participate in Assembly Bill (AB) 52 consultation on the proposed project were sent by the City to the tribal representation that have previously requested to receive notifications of proposed projects pursuant to PRC Section 21080.3.1 (AB 52). The tribes represented include:

- United Auburn Indian Community (UAIC)
- Wilton Rancheria
- Shingle Springs Band of Mi-Wuk Indians
- Buena Vista Rancheria of Me-Wuk Indians

A response was not received from UAIC, Wilton Rancheria, the Shingle Springs Band of Mi-Wuk Indians, or the Buena Vista Rancheria of Me-Wuk Indians within 30 calendar days of the request for formal invitation under AB 52.

B. SOURCES

The following documents are referenced information sources used for the purposes of this Initial Study:

1. Airport Land Use Commission for Sacramento, Sutter, Yolo, and Yuba Counties. *Sacramento Executive Airport Comprehensive Land Use Plan*. Amended May 1999.
2. California Air Resources Board. *The 2017 Climate Change Scoping Plan Update*. November 2017.
3. California Department of Conservation. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed May 2024.
4. California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Available at: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed August 2024.
5. California Department of Transportation. *California Scenic Highway Mapping System*. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed May 2024.

6. California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*. September 2013.
7. California Geological Survey. *Earthquake Zones of Required Investigation*. Available at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed July 2024.
8. California Tree and Landscape Consulting, Inc. *Pre-Development Arborist Report, Tree Inventory & Protection Plan – 1 Corporate Way, APN 031-0051-019-0000; City of Sacramento Jurisdiction*. July 29, 2024.
9. TSD Engineering, Inc. *Drainage Technical Memorandum*. April 8, 2024.
10. City of Sacramento Community Development Department. *Citywide Commercial Design Guidelines – Site Plan and Design Review Guidelines Checklist*. July 4, 2019.
11. City of Sacramento Department of Utilities. *2021 Consumer Confidence Report*. Available at: <https://www.cityofsacramento.org/Utilities/Reports>. Accessed August 2023.
12. City of Sacramento, California. *Greenhaven Executive Park Planned Unit Development Guidelines*. Revised July 14, 2016.
13. City of Sacramento. *City of Sacramento 2020 Urban Water Management Plan*. June 2021.
14. City of Sacramento. *City of Sacramento Bicycle Master Plan*. August 2016.
15. City of Sacramento. *Public Review Draft Master Environmental Impact Report Sacramento 2040 General Plan and Climate Action & Adaptation Plan*. August 2023.
16. Department of Toxic Substances Control. *EnviroStor*. Available at: <https://dtsc.ca.gov/your-envirostor/>. Accessed August 2024.
17. ExtraSpace Storage. *What Can I Store in a Storage Unit*. Available at: <https://www.extraspace.com/self-storage/>. Accessed August 2024.
18. Federal Emergency Management Agency. *Flood Insurance Rate Maps 06013C0144G, Effective on 09/30/2015*. Available at: <https://msc.fema.gov/portal/search>. Accessed July 2024.
19. GeoEngineers, Inc. *Phase I Environmental Site Assessment 1 Corporate Way Sacramento, California*. October 4, 2023.
20. Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts In CEQA*. December 2018.
21. Native American Heritage Commission. *Re: Self Storage Facility on Corporate Way, Sacramento County*. May 16, 2024.
22. North Central Information Center. *Records Search results for Self Storage Facility on Corporate Way Project*. May 13, 2024.
23. Office of Environmental Health Hazard Assessment. *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*. February 2015.
24. Sacramento County. *Local Hazard Mitigation Plan Update*. September 2021.
25. Sacramento Metropolitan Air Quality Management District. *Air Quality Pollutants and Standards*. Available at: <http://www.airquality.org/air-quality-health/air-quality-pollutants-and-standards>. Accessed August 2024.
26. Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 1: Introduction and Air Quality*. October 2020.
27. Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 6: Greenhouse Gases*. February 2021.
28. Sacramento Regional County Sanitation District. *Sewer System Management Plan*. February 4, 2019.
29. U.S. Department of Agriculture. *Web Soil Survey*. Available at: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed August 2024.
30. U.S. Environmental Protection Agency. *User's Guide for the AMS/EPA Regulatory Model (AERMOD)*. December 2016.

31. U.S. Fish and Wildlife Service. *National Wetlands Inventory*. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed August 2024.
32. Youngdahl Consulting Group, Inc. *Geotechnical Engineering Study for Banner Self-Storage Facility*. November 2023.

C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| ☐ Aesthetics | ☐ Agriculture and Forest Resources | ☒ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology and Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☒ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☒ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☒ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☒ Mandatory Findings of Significance |

D. DETERMINATION

On the basis of this initial study:

- ☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Self-Storage Facility on Corporate Way Project
Initial Study/Mitigated Negative Declaration*

Ron Bess

Signature

Ron Bess, Associate Planner

Printed Name

October 2, 2024

Date

City of Sacramento

For

E. INTRODUCTION

This Initial Study identifies and analyzes the potential environmental impacts of the proposed project. The information and analysis presented in this document is organized in accordance with the order of the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines. Where the analysis provided in this document identifies potentially significant environmental effects of the project, mitigation measures are prescribed.

The mitigation measures prescribed for environmental effects described in this Initial Study would be implemented in conjunction with the project, as required by CEQA. The mitigation measures would be incorporated into the project through project conditions of approval. The City would adopt findings and a Mitigation Monitoring/Reporting Program for the project in conjunction with approval of the project.

In August 2023, the City of Sacramento completed a comprehensive update of the City's General Plan,¹ and certified a Master Environmental Impact Report (EIR) for the updated General Plan.² The Master EIR is a program EIR, prepared pursuant to Section 15168 of the CEQA Guidelines (Title 14, California Code of Regulations [CCR] Sections 15000 *et seq.*). The Master EIR analyzed full implementation of the General Plan and identified measures to mitigate the significant adverse impacts associated with the General Plan. Consistent with Section 15150 of the CEQA Guidelines, applicable portions of the General Plan and Master EIR are incorporated by reference as part of this Initial Study.

F. PROJECT DESCRIPTION

The following provides a description of the project site's current location and setting, as well as the proposed project components and the discretionary actions required for the project.

Project Location and Setting

The approximately 2.27-acre project site is located southeast of the intersection of Corporate Way and Park City Drive in the City of Sacramento, California (see Figure 1). The site is identified by APN 031-0051-019. The project site is undeveloped and is covered with ruderal grasses. The topography of the site is relatively flat, with slight undulations.

Surrounding existing land uses include Merryhill Preschool to the north and an apartment complex further north, across Corporate Way; office buildings and undeveloped land to the east, across Corporate Way; a church and associated parking lot to the south; a Meals on Wheels office to the southwest; and a senior community center and adult day care center to the west, across Park City Drive (see Figure 2). The project site is located in the Pocket Community Plan and the Greenhaven Executive Park PUD. The City of Sacramento 2040 General Plan designates the project site as Commercial Mixed-Use and the site is zoned as OB-EA-3-PUD. The Pocket Community Plan designates the project site as Employment Center (Mid Rise).

Project Components

The proposed project would include development of a three-story, climate-controlled, 152,625-sf self-storage facility, including a total of 1,323 storage units, 900 sf of office space, and a 900-sf on-site manager's apartment (see Figure 3).

¹ City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

² City of Sacramento. *Public Review Draft Master Environmental Impact Report Sacramento 2040 General Plan and Climate Action & Adaption Plan*. August 2023.

**Figure 1
Regional Project Location**

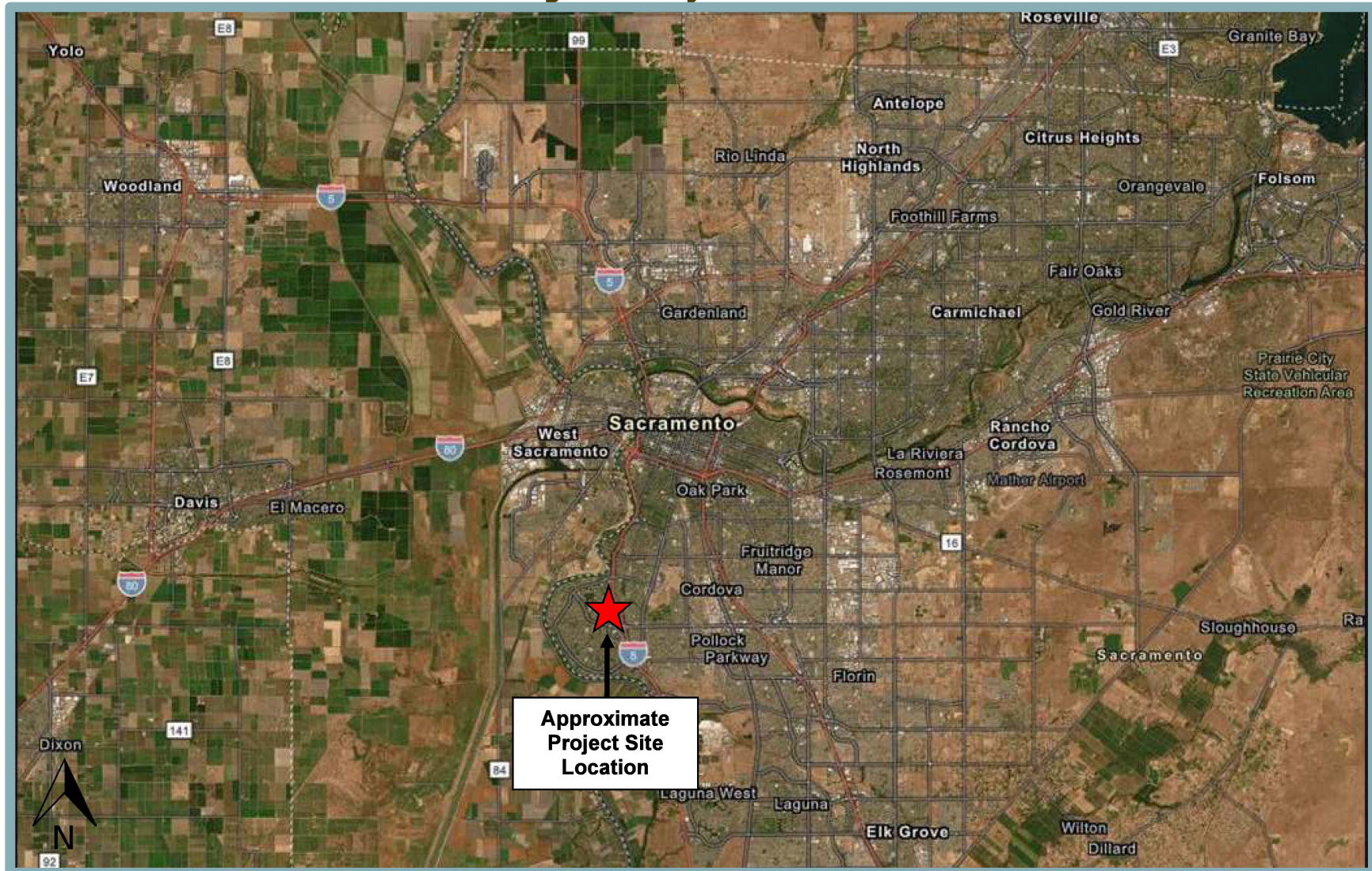
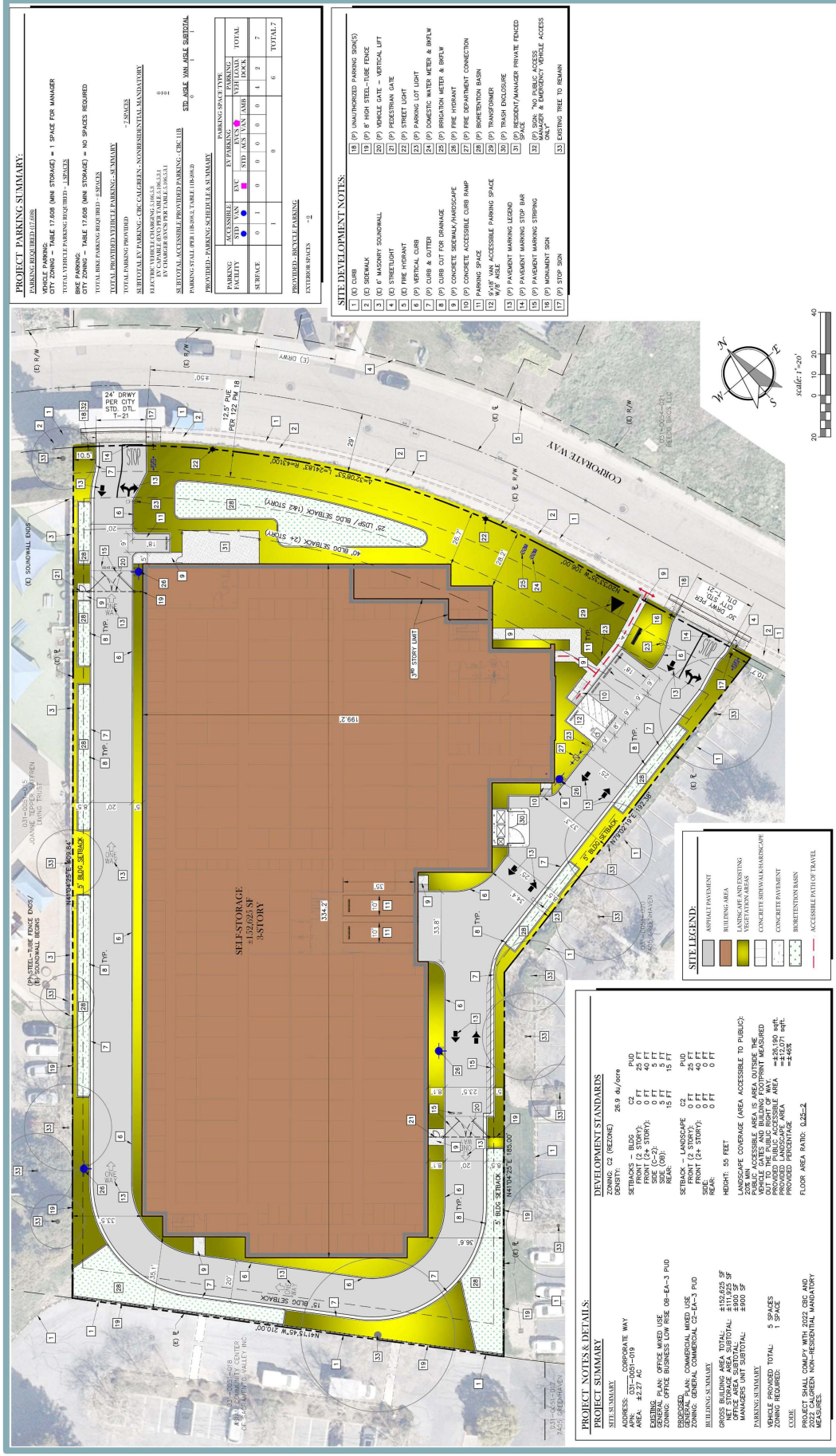


Figure 2
Project Location



Figure 3 Site Plan



The facility would be a maximum of 42 feet tall. Development of the site would also include associated parking, landscaping, and utility improvements. The proposed project would require City approval of the following: Rezone, PUD Amendment, Conditional Use Permit, and Site Plan and Design Review. The details of the proposed project, including required approvals, are described in further detail below.

Access and Circulation

Access to the project site would be provided by way of two new driveways on Corporate Way. Paved drive aisles and parking areas would be constructed to provide vehicle access to the building. The paved, one-way 20-foot wide drive aisle would loop around the building and would serve as a fire lane (see Figure 4).

The proposed project would provide five parking spaces, including four spaces in the eastern portion of the project site near the southern entrance from Corporate Way, and one space on the other side of the building near the northern entrance from Corporate Way. Additionally, two interior loading spaces would be provided at a 33.8-foot-wide loading bay located on the eastern side of the building. One on-site space would be Americans with Disabilities Act (ADA) compliant. The proposed project would also include five on-street parking spaces.

The proposed project would provide a pedestrian walkway between the existing sidewalk on Corporate Way and the building entrance located in the northeast corner of the building.

Landscaping and Fencing

As shown in Figure 5, landscaped areas would be provided along the project boundaries. Landscaping around the perimeter of the site would include a variety of trees and shrubs. Throughout the site, planters would be installed with trees and shrubbery to provide shaded parking. Landscaping trees would be planted in compliance with Section 17.612.040 of the Sacramento Municipal Code.

New eight-foot-high tubular steel fencing would be installed around the western, southern, and eastern boundaries of the project site. A six-foot-high wood privacy fence would be provided at the manager apartment unit patio. An existing six-foot masonry soundwall associated with the adjacent Merryhill Preschool is located along the northern property line.

Utilities

The following section describes the water, wastewater, and stormwater drainage infrastructure improvements that would be installed as part of the proposed project.

Water

Municipal water for the project area is currently supplied by the City of Sacramento Department of Utilities (DOU). The City uses surface water from the American and Sacramento rivers, as well as groundwater north of the American River to meet the City's demands. Pursuant to Section 13.2.3 of the City of Sacramento Design and Procedure Manual, a water study would be required, and the proposed project would be subject to the new DOU water impact fees, which are based on the City water meter size. Existing water mains in the immediate project vicinity include a 12-inch water main within Corporate Way (see Figure 6). From four points of connection at the existing water main, two eight-inch service taps for a proposed on-site private fire loop, one 1.5-inch irrigation service tap, and one 1.5-inch domestic service tap would extend into the project site.

Figure 4
Preliminary Truck Access Plan

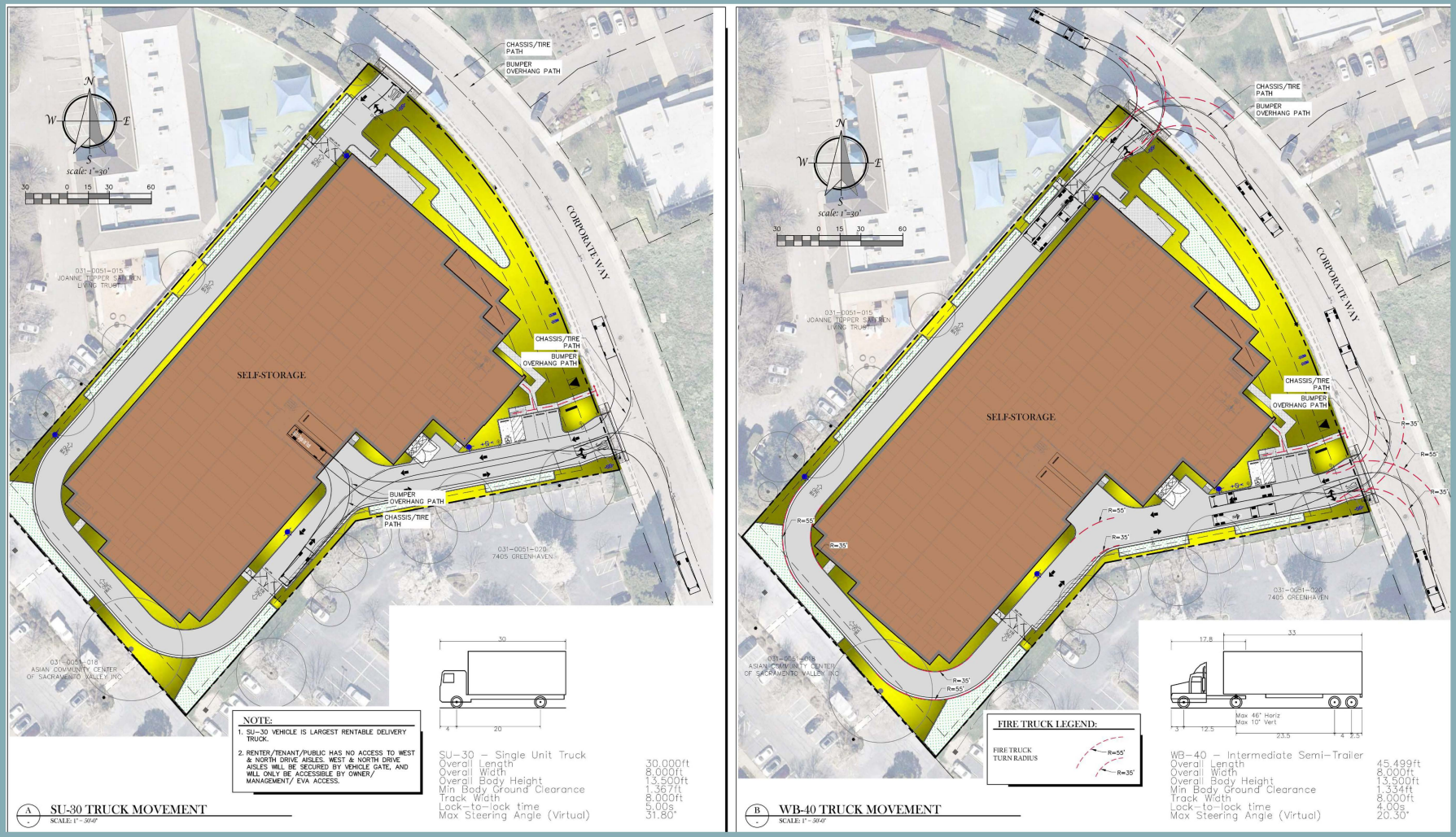


Figure 5
Landscape Plan

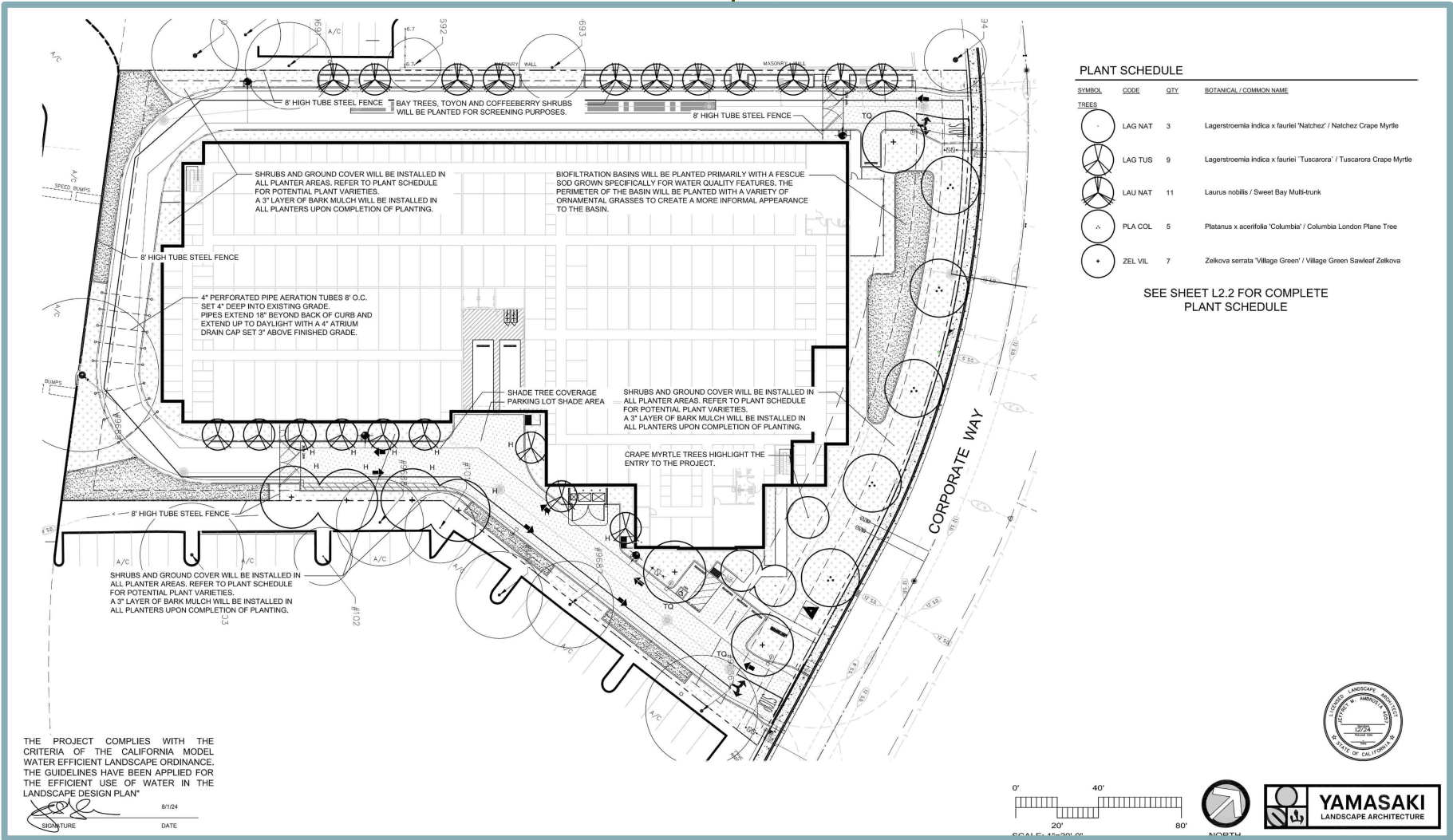
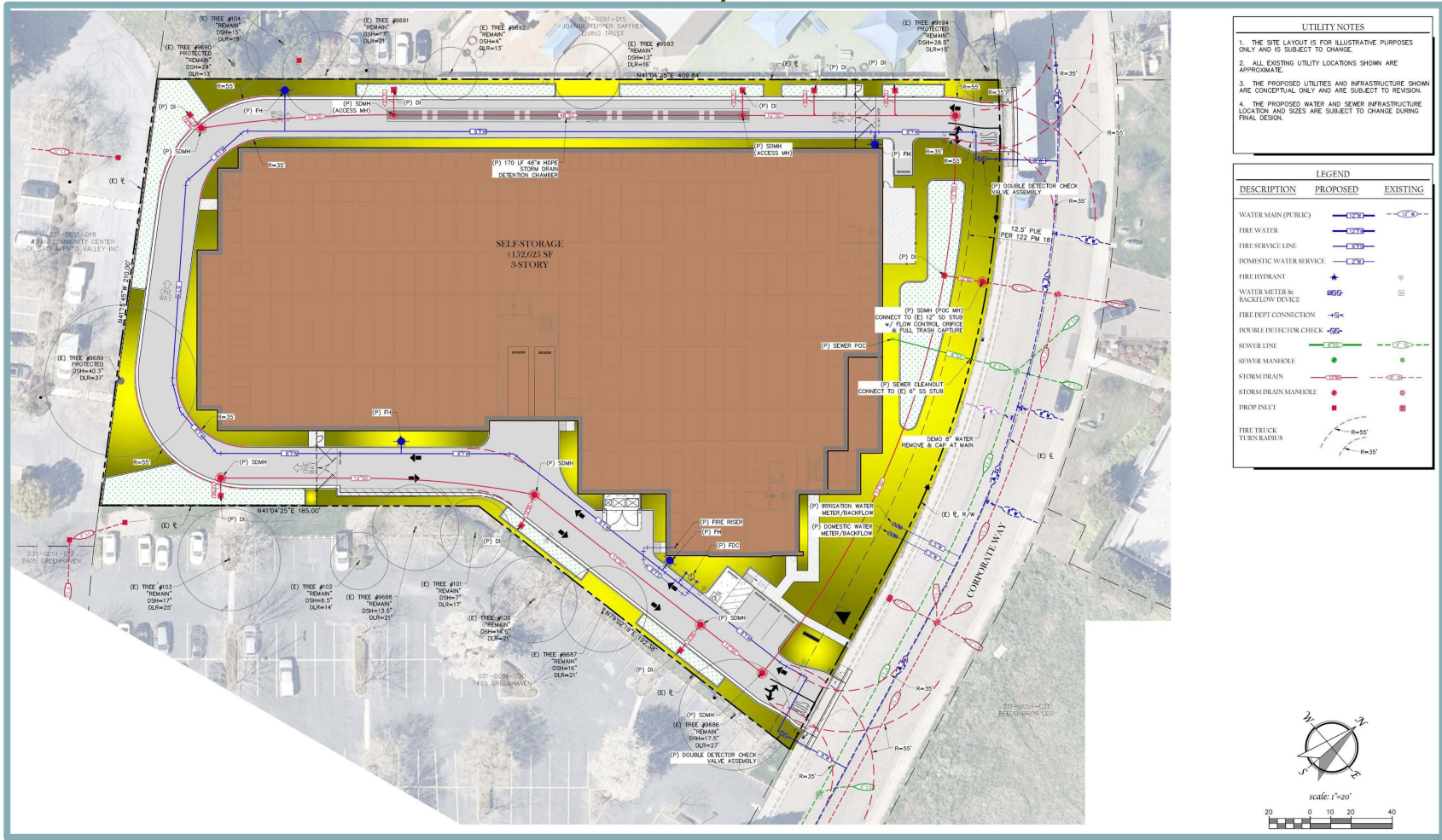


Figure 6
Utility Plan



Wastewater

Wastewater treatment for the project area is currently provided by the Sacramento Area Sewer District (SacSewer). It should be noted that prior to December 26, 2023, SacSewer was represented by two independent special districts, a previous iteration of SacSewer and the Sacramento Regional County Sanitation District (Regional San). However, Sacramento LAFCo authorized a reorganization of the districts, dissolving the former SacSewer, annexing the district into Regional San, and subsequently naming the wastewater special district “Sacramento Area Sewer District.”

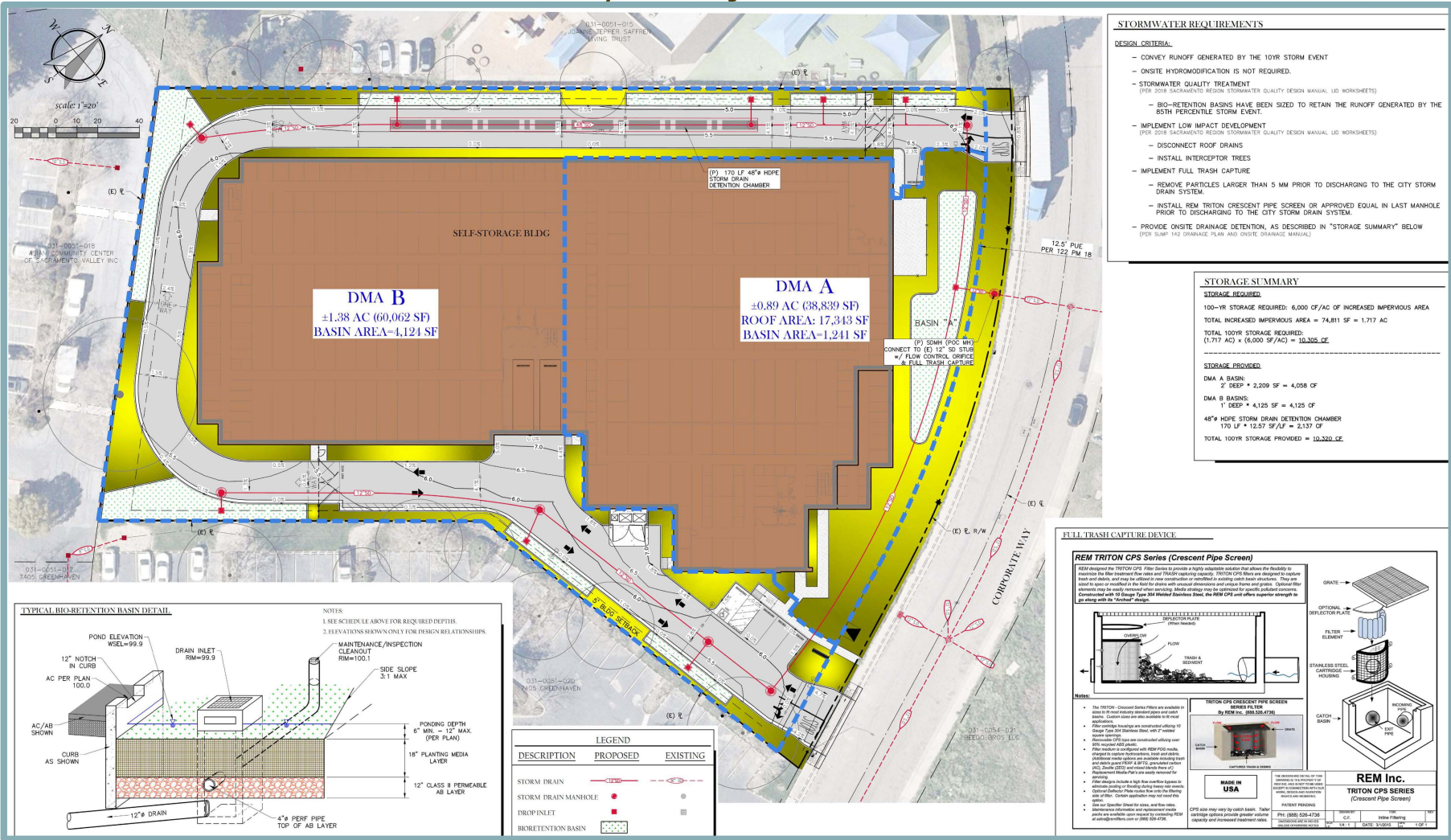
The project site is located within Sewer Basin 137, and would be subject to the new DOU sewer impact fee, which is based on equivalent single-family dwelling (ESD) generation. Wastewater generated in the project area is collected in the City’s separated sewer system through a series of sewer pipes and flows into the SacSewer interceptor system, where the sewage is conveyed to the Sacramento Regional Wastewater Treatment Plant (SRWWTP). The SRWWTP is owned and operated by SacSewer and provides sewage treatment for the entire City. The proposed project would connect to an existing six-inch sewer public sewer and an existing public sewer manhole located within Corporate Way by way of a new six-inch sewer line (see Figure 6).

Stormwater Drainage

The City’s DOU provides storm drainage service throughout the City by using drain inlets, pumps, and canals. The City provides stormwater drainage through either the City’s Combined Sewer System (CSS) or into individual drainage sumps located throughout the City. Stormwater collected by the CSS is transported to SacSewer’s SRWWTP, where runoff is then treated prior to discharge into the Sacramento River. The project site is located within the City’s Separated Sewer System, and, therefore, stormwater drainage at the project site is collected by individual drainage sumps.

Existing stormwater drainage infrastructure in the project vicinity includes a 12-inch storm drain public main within Corporate Way (see Figure 7). The proposed project would include approximately 1.7 gross acres of new impervious surfaces as part of development of the building and associated parking lot. The project site would be divided into two drainage management areas (DMAs), DMA A and DMA B. Stormwater runoff from the new impervious surfaces within the DMAs would be directed to nine new drop inlets located within bioretention basins along the boundaries of the site, which would convey flows to a new 12-inch storm drain line that would extend and connect to the existing storm drain public main located in Corporate Way. The project site is located within Drainage Basin 142; therefore, the proposed project is subject to mitigate on-site through detention. A 170-foot long and 48-inch wide underground storm drain detention chamber would be located within the western drive aisle and would connect to the new private on-site 12-inch storm drain lines (see Figure 7). The project site is not served by an existing regional water quality control facility, and the proposed project would include more than one acre of new impervious area; therefore, Low Impact Development (LID) and permanent on-site treatment measures would be required. Source control measures would be included, consistent with the Stormwater Quality Design Manual for the Sacramento Region, as well as full capture trash devices. A drainage study would be required, and the proposed project would be subject to the new DOU drainage impact fees, which are based on the net increase of impervious surface area.

Figure 7
Preliminary Drain Management Area Plan



Rezone and PUD Amendment

The proposed project would require approval of a Rezone to change the zoning designation of the project site from OB-EA-3-PUD to C-2-EA-3-PUD. Permitted uses in the C-2-EA-3-PUD zone include, but are not limited to, office support uses, restaurants (excluding drive-in or fast-food), private club-social centers, banks (excluding drive-throughs), hotels, vehicle storage, mini storage, individual storage, and locker buildings.

The proposed project would also require a Greenhaven Executive Park PUD Schematic Map Amendment to reclassify 2.27 acres from office use to commercial use.

Conditional Use Permit

According to the Greenhaven Executive Park PUD, mini storage facilities are an allowed use within the C-2 zone. However, pursuant to Sacramento City Code Section 17.216.710, mini storage facilities require approval of a Conditional Use Permit within the C-2 zone. Thus, the proposed project would require approval of a Conditional Use Permit to establish a mini-storage facility within the C-2 zone.

Site Plan and Design Review

The proposed project would require approval of Site Plan and Design Review for the construction of the 152,625-sf commercial building and site improvements. As detailed in Sacramento City Code Section 17.808.100, the purpose of the Site Plan and Design Review is to ensure that the physical aspects of development projects are consistent with the 2040 General Plan and applicable Specific Plans and/or Transit Village Plans, as well as with applicable design guidelines. Additionally, the purpose of the permit is to ensure a development is of high quality and is compatible with and complementary to surrounding development; to ensure streets and other public access ways and facilities, parking facilities, and utility and other infrastructure, both on-site and off-site, are adequate and available to support a development and conform to City development standards; to promote energy efficiency and water conservation; and to avoid or minimize, to the extent feasible, adverse environmental effects of development.

Discretionary Actions

Implementation of the proposed project would require the following discretionary actions by the City of Sacramento:

- Rezone. The proposed project would require approval of a Rezone to change the zoning designation of the project site from OB-EA-3-PUD to C-2-EA-3-PUD.
- PUD Amendment: The proposed project would require approval of a Greenhaven Executive Park PUD Schematic Map Amendment to reclassify 2.27 acres from office use to commercial use.
- Conditional Use Permit: The proposed project would require approval of a Conditional Use Permit to establish a mini-storage facility in the C-2 zone.
- Site Plan and Design Review. Pursuant to Section 17.808.100 of the City of Sacramento Code, Site Plan and Design Review shall be required for the proposed project

G. ENVIRONMENTAL CHECKLIST

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigation measures recommended, as appropriate, as part of the proposed project. For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Less Than Significant with Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than-significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The project would not have any impact.

I. AESTHETICS.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	✗	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	✗	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	✗	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	✗	☐

Discussion

- a,b. Examples of typical scenic vistas include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. In general, a project's impact to a scenic vista would occur if development of the project would substantially change or remove a scenic vista. Existing scenic resources in the City of Sacramento include major natural open space features such as the American River and Sacramento River, including associated parkways. In addition, according to the Master EIR, scenic resources in the City include the State Capitol building, Tower Bridge, and Sutter's Fort. The project site does not contain scenic resources and is not within an area designated as a scenic resource or vista. In addition, the Master EIR concluded that with implementation of General Plan policies, development under the 2040 General Plan would not result in substantial changes to important scenic resources. Because the proposed project is consistent with the project site's Commercial Mixed-Use General Plan designation, the proposed project would not result in significant impacts related to scenic resources beyond what has previously been anticipated by the City.

According to the California Scenic Highway Mapping System, the project site is located approximately two miles northwest of the nearest Officially Designated State Scenic Highway, which is the portion of State Route (SR) 160 located within Sacramento County.³ The project site is not visible to motorists travelling along the officially designated scenic portion of SR 160 and, as a result, development of the proposed project would not affect scenic resources within a State scenic highway. Furthermore, the project site does not contain any scenic resources such as trees, rock outcroppings, or historic buildings.

Based on the above, the proposed project would not have a substantial adverse effect on a scenic vista and would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. Thus, a ***less-than-significant*** impact would occur.

³ California Department of Transportation. *California Scenic Highway Mapping System*. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed May 2024.

- c. The project site is undeveloped; however, surrounding land uses include the Merryhill Preschool to the north and an apartment complex further north, across Corporate Way; office buildings and undeveloped land to the east, across Corporate Way; a church and associated parking lot to the south; an office to the southwest; and a senior community center and adult day care center to the west, across Park City Drive. Therefore, the site is in an urbanized area and, in accordance with the CEQA Guidelines, the relevant threshold is whether the project would conflict with applicable zoning and other regulations governing scenic quality.

The proposed project is subject to Site Plan and Design Review in accordance with Sacramento City Code Section 17.808.100, which would ensure that the proposed project is consistent with the 2040 General Plan, and applicable plans, such as the Pocket Community Plan, as well as with applicable design guidelines included in the Citywide Commercial Design Guidelines.⁴ Accordingly, the City's Site Plan and Design Review process would ensure that the proposed development would not conflict with applicable zoning and other regulations governing scenic quality.

The immediate project vicinity, as viewed from Corporate Way, is characterized by existing commercial and office uses. As such, the proposed project would be visually compatible with the surrounding existing uses. The proposed project would be consistent with the site's land use designation, and would comply with applicable policies set forth by the 2040 General Plan. In addition, the project would be subject to applicable regulations and standards set forth in the Greenhaven Executive Park PUD Guidelines, including requirements pertaining to height, density, lot coverage, lot sizes, width, depth, and setbacks. Finally, new landscaping would be provided primarily along the site frontage and western and eastern site boundaries, consistent with the requirements established by Sacramento City Code Chapter 7.612. Pursuant to Section 17.612.010 of the City Code, the proposed project would be required to include and maintain landscaping within all required front-yard and street side-yard setbacks. Additionally, a landscaped planter is required to separate all surfaced areas from the adjacent public street. Pursuant to Section 17.612.040, trees are required to be planted and maintained throughout the surface parking facility to ensure that, within 15 years after establishment of the parking facility, at least 50 percent of the parking facility will be shaded. All planting, soil volumes, and maintenance would be required to comply with the parking facility tree shading design and maintenance guidelines.

In addition, while the proposed project would include a Rezone and PUD Amendment, the proposed project is consistent with the site's current General Plan designation of Commercial Mixed-Use. Therefore, the City has generally anticipated the development of the site with the proposed uses.

Based on the above, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality, and a ***less-than-significant*** impact would occur.

- d. The project site is undeveloped and, thus, does not contain existing sources of light or glare. Implementation of the proposed project would develop the site with a self-storage facility. As a result, implementation of the project would introduce new sources of light and glare where none currently exist. Potential sources of light and glare associated with the proposed project would include interior light spilling through windows, exterior lighting,

⁴ City of Sacramento Community Development Department. *Citywide Commercial Design Guidelines – Site Plan and Design Review Guidelines Checklist*. July 4, 2019.

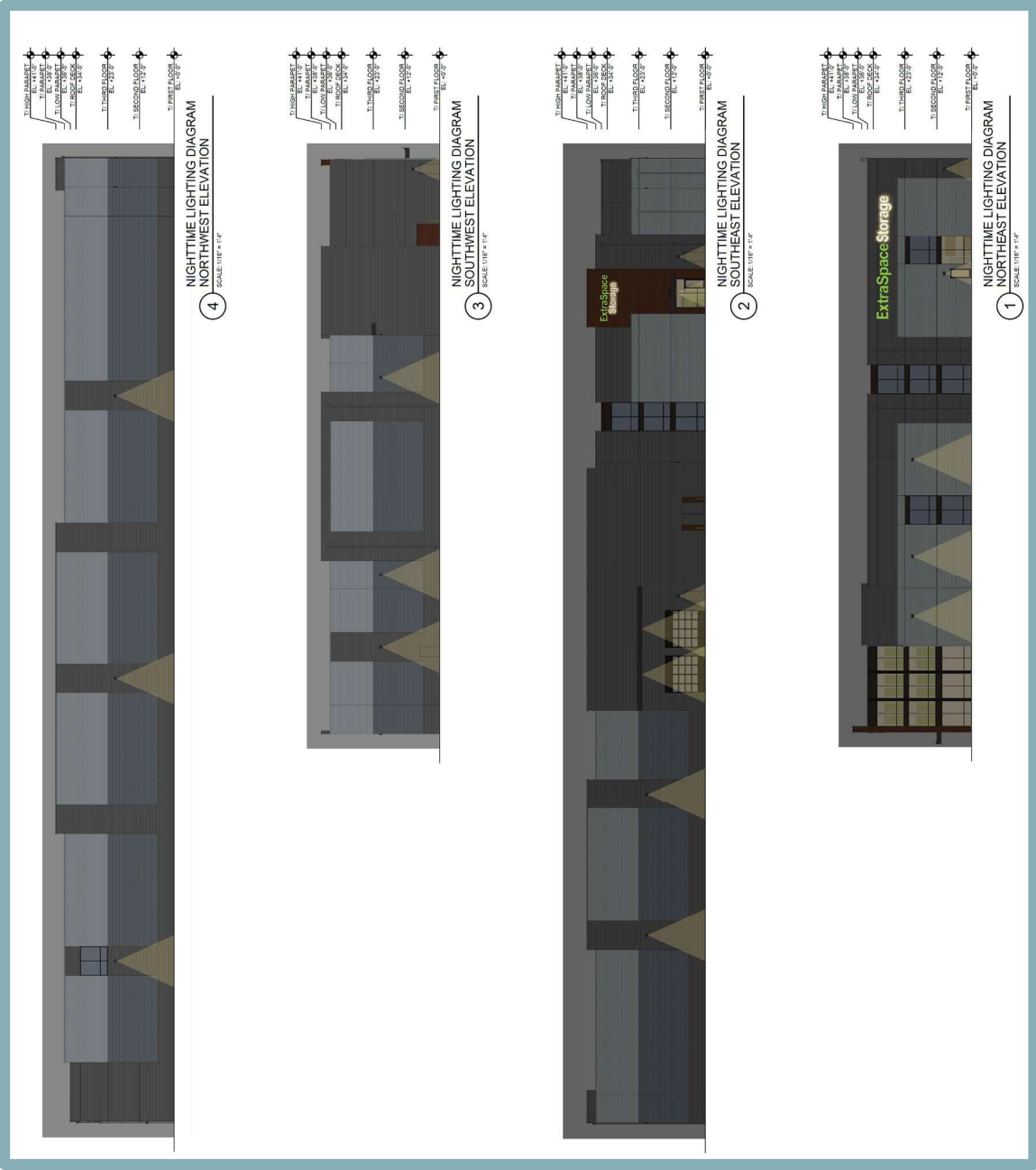
parking lot lighting, and light reflected off windows. The type and intensity of light and glare would be similar to that of the surrounding developments.

The proposed project would be required to comply with General Plan Policy LUP-4.6, which requires lighting to be shielded from view and directed downward, which would be ensured through the Site Plan and Design Review process. A nighttime lighting exhibit was prepared for the project, which shows light would be cast downwards, and, therefore would not be cast onto the nearby roadways or residential uses (see Figure 8). Through compliance with applicable General Plan policies, the proposed project would not be expected to cause a public annoyance related to new sources of glare or create new sources of light that would be cast onto oncoming traffic or nearby residential uses.

All components of the proposed project would be subject to Site Plan and Design Review by the City of Sacramento to ensure light and glare do not obstruct day or nighttime views in the area. Citywide design guidelines for lighting requires even illumination and prohibits unwanted glare towards adjacent or other sensitive areas. Pursuant to the Citywide Commercial Design Guidelines, downlighting and other features reducing sky-lighting are encouraged. Compliance with such standards would ensure that on-site lighting would be directed within the project site and would not substantially illuminate adjacent properties.

Based on the above, implementation of the project would result in a ***less-than-significant*** impact with respect to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Figure 8
Nighttime Lighting



II. AGRICULTURE AND FOREST RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	✗
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	✗
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	✗
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	✗
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	✗

Discussion

- a,e. The project site currently consists of vacant, undeveloped land. According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the site is designated as "Urban and Built-Up Land."⁵ In addition, the site is not zoned or designated in the General Plan for agricultural uses; rather, the project site is designated in the General Plan as Commercial Mixed-Use. Because the proposed use is consistent with the project site's land use designation, buildout of the site with non-agricultural uses was anticipated in the General Plan and analyzed in the Master EIR. Therefore, **no impact** would occur.
- b. The proposed project site is not under a Williamson Act contract and is not designated or zoned for agricultural uses. Therefore, buildout of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and **no impact** would occur.
- c,d. The project area is not considered forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), and is not zoned Timberland Production (as defined by Government Code Section 51104[g]). Therefore, the proposed project would have **no impact** with regard to conversion of forest land or any potential conflict with forest land, timberland, or Timberland Production zoning.

⁵ California Department of Conservation. *California Important Farmland Finder*. Available at: <https://maps.conservancy.ca.gov/DLRP/CIFF/>. Accessed May 2024.

III. AIR QUALITY.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	✗	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	✗	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	✗	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	✗	☐

Discussion

- a,b. The City of Sacramento is located within Sacramento County, which is within the boundaries of the Sacramento Valley Air Basin (SVAB) and under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). Federal and State ambient air quality standards (AAQS) have been established for six common air pollutants, known as criteria pollutants, due to the potential for pollutants to be detrimental to human health and the environment. The criteria pollutants include particulate matter (PM), ground-level ozone, carbon monoxide (CO), sulfur oxides, nitrogen oxides (NO_x), and lead. At the federal level, Sacramento County is designated as severe nonattainment for the 8-hour ozone AAQS, nonattainment for the 24-hour PM_{2.5} AAQS, and attainment or unclassified for all other criteria pollutant AAQS. At the State level, the area is designated as a serious nonattainment area for the 1-hour ozone AAQS, nonattainment for the 8-hour ozone AAQS, nonattainment for the PM₁₀ and PM_{2.5} AAQS, and attainment or unclassified for all other State AAQS.

As a part of the SVAB federal ozone nonattainment area, the SMAQMD works with the other local air districts within the Sacramento area to develop a regional air quality management plan under the Federal Clean Air Act (FCAA) requirement. The regional air quality management plan is called the State Implementation Plan (SIP) which describes and demonstrates how Sacramento County, as well as the Sacramento nonattainment area, would attain the required federal ozone standard by the proposed attainment deadline. In accordance with the requirements of the FCAA, the SMAQMD, along with the other air districts in the region, prepared the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan (Ozone Attainment Plan) in December 2008. The California Air Resources Board (CARB) determined that the Ozone Attainment Plan met FCAA requirements and approved the Plan on March 26, 2009 as a revision to the SIP. An update to the plan, the 2017 Revisions to the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan (2017 Ozone Attainment Plan), was prepared and adopted by CARB on November 16, 2017. An additional update to the plan was prepared and adopted by CARB on October 15, 2018, and known as the 2018 Updates to the California SIP.

Nearly all development projects in the Sacramento region have the potential to generate air pollutants that may increase the difficulty of attaining federal and State AAQS. Therefore, evaluation of air quality impacts is required. In order to evaluate ozone and other criteria air pollutant emissions and support attainment goals for those pollutants for which the area is designated nonattainment, SMAQMD has developed the Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide), which includes

recommended thresholds of significance, including mass emission thresholds for construction-related and operational ozone precursors, as the area is under nonattainment for ozone.⁶ The SMAQMD's recommended thresholds of significance for the ozone precursors reactive organic compounds (ROG) and NO_x, which are expressed in lbs/day and tons/yr, are presented in Table 1. As shown in the table, SMAQMD has construction and operational thresholds of significance for PM₁₀ and PM_{2.5} expressed in both pounds per day (lbs/day) and tons per year (tons/yr). The construction and operational thresholds for PM₁₀ and PM_{2.5} only apply to those projects that have implemented all applicable Best Available Control Technologies (BACTs) and Best Management Practices (BMPs).

Table 1 SMAQMD Thresholds of Significance		
Pollutant	Construction Threshold	Operational Threshold
NO _x	85 lbs/day	65 lbs/day
ROG	N/A ¹	65 lbs/day
PM ₁₀	80 lbs/day and 14.6 tons/yr ²	80 lbs/day and 14.6 tons/yr ³
PM _{2.5}	82 lbs/day and 15 tons/yr ²	82 lbs/day and 15 tons/yr ³
¹ The application of architectural coatings is typically the largest source of ROG emissions during construction activity. SMAQMD addresses construction-related emissions of ROG through the implementation of Rule 442, which regulates ROG emissions from architectural coatings. Therefore, SMAQMD has not adopted a threshold for construction-related ROG emissions. ² The identified construction thresholds of significance for PM ₁₀ and PM _{2.5} are only applicable when all feasible construction BMPs are applied. The SMAQMD's construction BMPs are also known as Basic Construction Emission Control Practices. (SMAQMD, <i>Basic Construction Emission Control Practices (Best Management Practices)</i> , July 2019) ³ The identified operational thresholds of significance for PM ₁₀ and PM _{2.5} are only applicable when all feasible operational BMPs and BACTs are applied. The implementation of BACTs apply only to stationary source operational emissions. (SMAQMD, <i>Operational Best Management Practices for PM from Land Use Development Projects</i> , October 2020)		
Source: SMAQMD Thresholds of Significance Table, April 2020.		

The City of Sacramento, as the CEQA Lead Agency for the proposed project, has formally adopted the SMAQMD's thresholds of significance. Therefore, if the proposed project's emissions exceed the pollutant thresholds presented in Table 1, the project could have a significant effect on air quality, the attainment of federal and State AAQS, and could conflict with or obstruct implementation of the applicable air quality plan.

Because construction equipment emits relatively low levels of ROG, and ROG emissions from other construction processes (e.g., asphalt paving, architectural coatings) are typically regulated by SMAQMD, SMAQMD has not adopted a construction emissions threshold for ROG. SMAQMD has, however, adopted a construction emissions threshold for NO_x, as shown in Table 1, above.

The proposed project's construction and operational emissions were quantified using the CalEEMod web-based software version 2022.1.1.26 – a Statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including greenhouse gas (GHG) emissions, from land use projects. The model applies inherent default values for

⁶ Sacramento Metropolitan Air Quality Management District. *Air Quality Pollutants and Standards*. Available at: <http://www.airquality.org/air-quality-health/air-quality-pollutants-and-standards>. Accessed August 2024.

various land uses, including construction data, vehicle mix, trip length, average speed, etc. Where project-specific information is available, such information is applied in the model. The proposed project's modeling assumed the following:

- Construction would begin in January 2026 and occur over approximately 14 months;
- The site preparation phase of construction would require the removal of approximately 1,000 cubic yards (CY) of soil from the site;
- The grading phase of construction would require the import of approximately 6,100 CY of soil;

The proposed project's estimated emissions associated with construction and operations and the proposed project's contribution to cumulative air quality conditions is provided below. All CalEEMod results are included as Appendix A to this Initial Study.

Construction Emissions

During construction of the proposed project, various types of equipment and vehicles would temporarily operate on the project site. Construction exhaust emissions would be generated from construction equipment, vegetation clearing and earth movement activities, construction worker commutes, and construction material hauling for the entire construction period. The aforementioned activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants. Project construction activities also represent sources of fugitive dust, which includes PM emissions. As construction of the proposed project would generate air pollutant emissions intermittently within the site and vicinity, until all construction has been completed, construction is a potential concern because the project site is in a non-attainment area for ozone, PM₁₀, and PM_{2.5}.

To apply the construction thresholds presented in Table 1, projects must implement all feasible SMAQMD BACTs and BMPs related to dust control. The control of fugitive dust during construction is required by SMAQMD Rule 403, and enforced by SMAQMD staff. The BMPs for dust control include the following:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads;
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered;
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited;
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph);
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [CCR, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site;

- Provide current certificate(s) of compliance for the CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [CCR, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html; and
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Compliance with the foregoing measures is required pursuant to Rule 403, and project construction is assumed to include compliance with the foregoing measures. Consequently, the proposed project's PM emissions are assessed in comparison to the thresholds presented in Table 1 above.

According to the CalEEMod results, buildout of the proposed project would result in maximum unmitigated construction criteria air pollutant emissions as shown in Table 2. As shown in the table, the proposed project's construction emissions would be below the applicable thresholds of significance for NO_x, PM₁₀, and PM_{2.5}.

Table 2			
Maximum Unmitigated Construction Emissions			
Pollutant	Construction Emissions	Threshold of Significance	Exceeds Threshold?
ROG	6.48 lbs/day	N/A	N/A
NO _x	18.1 lbs/day	85 lbs/day	NO
PM ₁₀	8.56 lbs/day and 0.25 tons/yr	80 lbs/day and 14.6 tons/yr	NO
PM _{2.5}	4.23 lbs/day and 0.11 tons/yr	82 lbs/day and 15 tons/yr	NO
Source: CalEEMod, July 2024 (see Appendix A).			

As shown in Table 2, the proposed project's maximum unmitigated construction-related emissions would be below the applicable thresholds of significance. Therefore, construction activities associated with development of the proposed project would not substantially contribute to the SVAB's non-attainment status for ozone or PM. Furthermore, the proposed project would be required to comply with all SMAQMD rules and regulations for construction, which would further reduce construction emissions of criteria pollutants to levels lower than those presented in Table 2. The applicable rules and regulations would include, but would not be limited to, the following:

- Rule 403 related to Fugitive Dust;
- Rule 404 related to Particulate Matter;
- Rule 407 related to Open Burning;
- Rule 442 related to Architectural Coatings;
- Rule 453 related to Cutback and Emulsified Asphalt Paving Materials; and
- Rule 460 related to Adhesives and Sealants.

Accordingly, construction of the proposed project would not violate an air quality standard or contribute to an existing or projected air quality violation, and a less-than-significant impact would occur associated with construction.

Operational Emissions

Operational emissions of ROG, NO_x, and PM would be generated by the proposed project from both mobile and stationary sources. Activities such as the future vehicle trips to and from the project site would make up the majority of the mobile emissions. Emissions would also occur from area sources, such as landscape maintenance equipment exhaust.

The estimated operational emissions for the proposed project are presented below in Table 3. It should be noted that the proposed project would not involve installation or operation of any pieces of equipment that would require implementation of SMAQMD's BACTs; therefore, the proposed project would be subject to SMAQMD's mass emissions thresholds for PM₁₀ and PM_{2.5}.

Table 3 Maximum Unmitigated Operational Emissions			
Pollutant	Project Emissions	Operational Threshold	Exceeds Threshold?
ROG	5.88 lbs/day	65 lbs/day	NO
NO _x	1.5 lbs/day	65 lbs/day	NO
PM ₁₀	2.34 lbs/day and 0.42 tons/yr	80 lbs/day and 14.6 tons/yr	NO
PM _{2.5}	0.62 lbs/day and 0.11 tons/yr	82 lbs/day and 15 tons/yr	NO
Source: CalEEMod, July 2024 (see Appendix A).			

As shown in Table 3, the proposed project's maximum unmitigated operational emissions would be below the applicable thresholds of significance. Therefore, operations associated with development of the proposed project would not substantially contribute to the SVAB's non-attainment status for ozone or PM, and a less-than-significant impact would occur associated with operations of the proposed project.

Cumulative Emissions

A cumulative impact analysis considers a project over time in conjunction with other past, present, and reasonably foreseeable future projects whose impacts might compound those of the project being assessed. Due to the dispersive nature and regional sourcing of air pollutants, air pollution is already largely a cumulative impact. The non-attainment status of regional pollutants, including ozone and PM, is a result of past and present development and, thus, cumulative impacts related to these pollutants could be considered cumulatively significant.

Adopted SMAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated non-attainment, consistent with applicable air quality plans. As future attainment of AAQS is a function of successful implementation of SMAQMD's planning efforts, according to the SMAQMD Guide, by exceeding the SMAQMD's project-level thresholds for construction or operational emissions, a project could contribute to the region's non-attainment status for ozone and PM emissions and could be considered to conflict with or obstruct implementation of the SMAQMD's air quality planning efforts.

As discussed above, the proposed project would result in construction and operational emissions below all applicable SMAQMD thresholds of significance for criteria pollutants. Therefore, the proposed project would not be considered to result in a cumulatively

considerable net increase of any criteria pollutant for which the project region is non-attainment, and impacts would be considered less than significant.

Conclusion

Because the proposed project would not result in construction-related or operational emissions of criteria air pollutants in excess of SMAQMD's thresholds of significance, the proposed project would not be considered to conflict with or obstruct the implementation of any applicable air quality plans. In addition, the proposed project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable AAQS. Therefore, a **less-than-significant** impact would occur.

- c. Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Sensitive receptors are typically defined as facilities where sensitive receptor population groups (i.e., children, the elderly, the acutely ill, and the chronically ill) are likely to be located. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest sensitive receptor to the project site is Merryhill Preschool, located immediately northwest of the project site.

The major pollutant concentrations of concern are localized carbon monoxide (CO), toxic air contaminant (TAC) emissions, and criteria pollutant emissions, which are addressed in further detail below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Pursuant to the SMAQMD Guide, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple years.⁷ The proposed project would not contribute to high levels of traffic congestion that could result in long-term generation of CO. Additionally, due to the continued attainment of CAAQS and NAAQS, and advances in vehicle emissions technologies, the likelihood that any single project would create a CO hotspot is minimal. Therefore, the proposed project would result in a less-than-significant impact related to localized CO emissions.

TAC Emissions

Another category of environmental concern is TACs. Health risks associated with TACs are a function of both the concentration of emissions and the duration of exposure, where the higher the concentration and/or the longer the period of time that a sensitive receptor is exposed to pollutant concentrations would correlate to a higher health risk. The CARB's Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) provides recommended setback distances for sensitive land uses from major sources of

⁷ Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 4: Operational Criteria Air Pollutant and Precursor Emissions*. October 2020.

TACs, including, but not limited to, freeways and high traffic roads, gas stations, chrome plating operations, distribution centers, and rail yards. The CARB has identified diesel particulate matter (DPM) from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM.

Operational-related emissions of TACs are typically associated with stationary diesel engines or land uses that involve heavy truck traffic or idling. The proposed project would not involve long-term or frequent operations of any stationary diesel engines and would not involve heavy truck traffic or idling. Thus, the proposed project would not expose sensitive receptors to substantial concentrations of DPM during operations.

However, short-term, construction-related activities could result in the generation of TACs, primarily DPM, from on-road haul trucks and off-road equipment exhaust emissions. Although DPM emissions from on-road haul trucks would be widely dispersed throughout the project site and surrounding vicinity as haul trucks move goods and material to and from the site, exhaust from off-road equipment would primarily occur within the project site. Sensitive receptors in the project vicinity include Merryhill Preschool, located adjacent to the site's northwestern boundary, as well as single- and multi-family residences, located in the project vicinity to the north, south, east, and west. Consequently, the operation of off-road equipment within the project site, as well as the operation of heavy-duty trucks associated with off-hauling demolition materials, during project construction could result in exposure of nearby receptors to DPM.

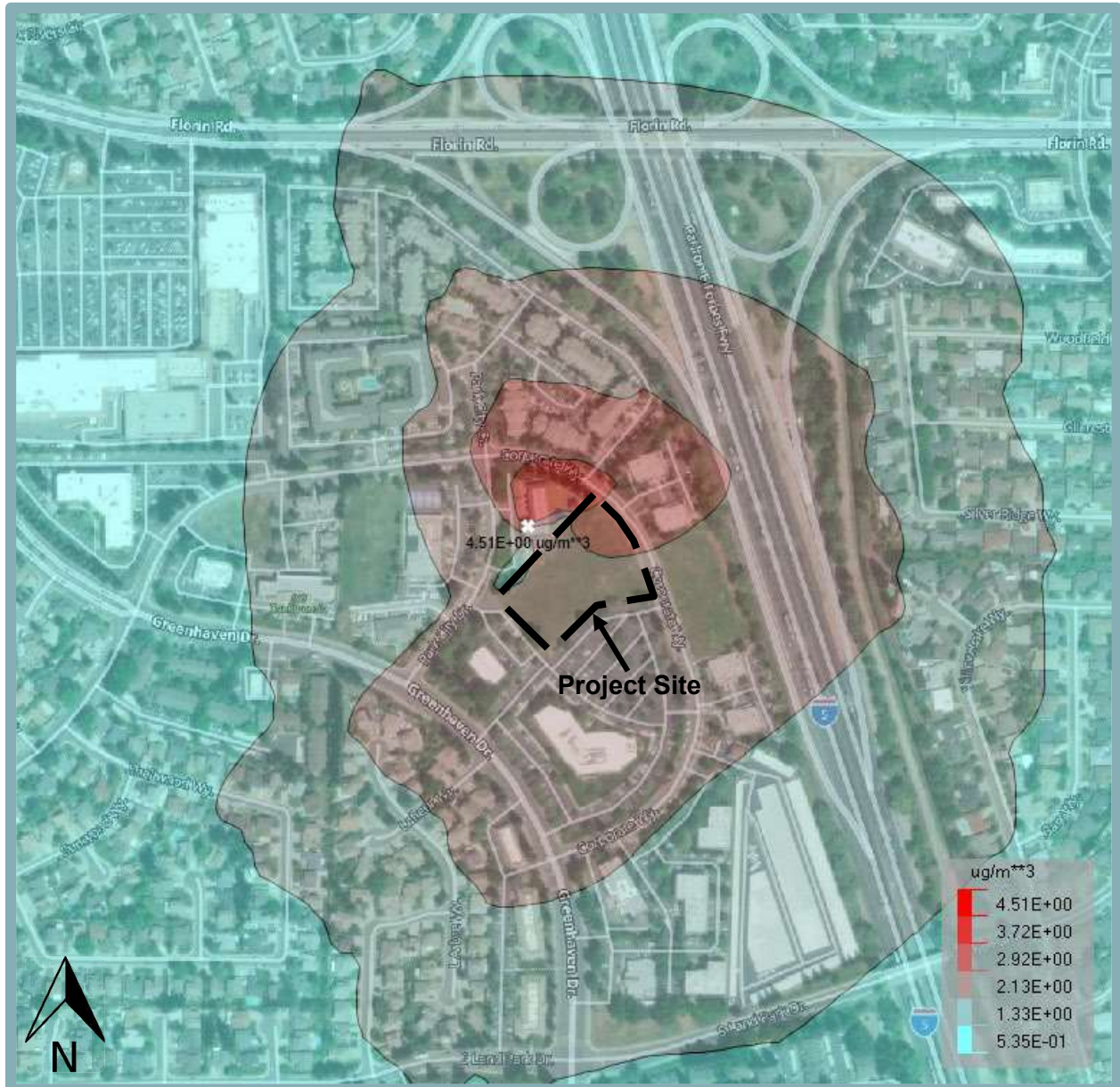
In order to determine if construction activities associated with the project would result in the exposure of any sensitive receptors to substantial pollutant concentrations, the concentration of PM_{2.5} at the maximally exposed sensitive receptor nearest to the site has been estimated using the American Meteorological Society/Environmental Protection Agency (AMS/EPA) Regulatory Model (AERMOD). The associated cancer risk and non-cancer hazard index were calculated using the CARB's Hotspot Analysis Reporting Program Version 2 (HARP 2) Risk Assessment Standalone Tool (RAST), which calculates the cancer and non-cancer health impacts using the risk assessment guidelines of the 2015 Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual for Preparation of Health Risk Assessments.⁸ The modeling was performed in accordance with the U.S. Environmental Protection Agency's (USEPA's) User's Guide for the AMS/EPA Regulatory Model – AERMOD⁹ and the 2015 OEHHA Guidance Manual. The results of the dispersion modeling are included as Figure 9.

As shown in the figure, the maximally exposed receptor, represented by a white X, is located at Merryhill Preschool immediately northwest of the project site. Based on the foregoing methodology, and the methodology presented in response to questions 'a' and 'b' regarding the estimation of construction emissions, the cancer risk and non-cancer hazard indices were estimated for the maximally exposed receptor, are presented in Table 4.

⁸ Office of Environmental Health Hazard Assessment. *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments* [pg. 8-18]. February 2015.

⁹ U.S. Environmental Protection Agency. *User's Guide for the AMS/EPA Regulatory Model (AERMOD)*. December 2016.

Figure 9
AERMOD Results



Source: AERMOD, August 2024.

Table 4 Maximum Unmitigated Cancer Risk and Hazard Index Associated with project Construction DPM			
	Cancer Risk (per million persons)	Acute Hazard Index	Chronic Hazard Index
Construction	30.30	0.00	0.03
<i>Thresholds of Significance</i>	<i>10</i>	<i>1.0</i>	<i>1.0</i>
Exceed Thresholds?	YES	NO	NO
<i>Sources: AERMOD, and HARP 2 RAST, August 2024 (see Appendix A).</i>			

As shown in Table 4, construction of the proposed project would not result in acute or chronic hazard indices in excess of SMAQMD's standards. However, project construction would have the potential to result in cancer risks in excess of SMAQMD's 10 cases per million threshold. It is noted that all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation, which is intended to help reduce emissions associated with off-road diesel vehicles and equipment, including DPM. The In-Use Off-Road Diesel Vehicle Regulation includes the following standards:

- Imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles;
- Requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled;
- Restricts the adding of older vehicles into fleets; and
- Requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits).

Nonetheless, based on the results of the modeling, construction of the proposed project could result in exposure of nearby receptors to substantial pollutant concentrations.

Criteria Pollutants

Recent rulings from the California Supreme Court (including the *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 case regarding the proposed Friant Ranch Project) have underscored the need for the analysis of potential health impacts resulting from the emission of criteria pollutants during operations of proposed projects. Although analysis of project-level health risks related to the emission of CO and TACs has long been practiced under CEQA, the analysis of health impacts due to individual projects resulting from emissions of criteria pollutants is a relatively new field. In October of 2020, SMAQMD released the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (Guidance) for the analysis of criteria emissions in areas within the SMAQMD's jurisdiction. The Guidance represents SMAQMD's effort to develop a methodology that provides a consistent, reliable, and meaningful analysis in response to the Supreme Court's direction on correlating health impacts to a project's emissions.

The Guidance was prepared by conducting regional photochemical modeling, and relies on the USEPA's Benefits Mapping and Analysis Program (BenMAP) to assess health impacts from ozone and PM_{2.5}. SMAQMD has prepared two tools that are intended for use in analyzing health risks from criteria pollutants. Small projects with criteria pollutant emissions close to or below SMAQMD's adopted thresholds of significance may use the *Minor Project Health Effect Screening Tool*, while larger projects with emissions between

two and eight times greater than SMAQMD's adopted thresholds may use the *Strategic Area Project Health Screening Tool*.¹⁰ Considering the proposed project would not result in emissions which exceed the SMAQMD's thresholds of significance, the project would qualify for the *Minor Project Health Effects Screening Tool*. It is important to note, however, that the *Minor Project Health Effects Screening Tool* applies the assumption that all small projects result in emissions of criteria pollutants equal to the SMAQMD thresholds of significance. As shown in Table 3, the proposed project would result in operational emissions well below the SMAQMD thresholds of significance and, thus, the health impacts calculated for the proposed project using the *Minor Project Health Effects Screening Tool* are highly conservative. The project's actual health impacts associated with criteria pollutant emissions would be expected to be much less than what is presented herein based on the aforementioned SMAQMD tool. Results from the *Minor Project Health Effects Screening Tool* are shown in Table 5 below.

As shown in the table, according to the *Minor Project Health Effects Screening Tool*, which is based on the highly conservative assumption that the proposed project would emit criteria pollutants at levels equal to the SMAQMD thresholds of significance, the proposed project could result in approximately 2.0 premature deaths per year due to the project's PM_{2.5} impacts, and could result in approximately 0.046 premature deaths per year due to the project's ozone impacts. Such numbers represent a very small increase over the background incidence of premature deaths due to PM_{2.5} and ozone concentrations (0.0045 percent and 0.00015 percent, respectively). PM_{2.5} emissions from the proposed project could result in approximately 0.98 asthma-related emergency room visits, and ozone emissions from the proposed project could result in approximately 1.05 asthma-related emergency room visits. Such numbers represent a minute increase over the background level of asthma-related emergency room visits (0.005 percent and 0.0057 percent, respectively).

As noted above, because the proposed project's emissions would be substantially below the SMAQMD thresholds of significance, the project's actual health impacts associated with criteria pollutant emissions would be much lower than what is presented above.

Conclusion

Based on the above discussion, the proposed project would not expose any sensitive receptors to substantial concentrations of CO or criteria pollutants during construction or operation. However, project construction would have the potential to result in cancer risks in excess of SMAQMD's 10 cases per million threshold. Thus, construction of the proposed project could result in exposure of nearby receptors to substantial concentrations of TACs. Consequently, the proposed project would result in a **potentially significant** impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

Mitigation Measure(s)

The most effective way to reduce construction-related DPM emissions is by improving the engine tier/engine efficiency of construction equipment. Off-road diesel engines that are used in construction equipment fall into efficiency tiers, with the most efficient being the Tier 4 final emission standards.

¹⁰ Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. June 2020.

Table 5
Estimated Health Effects from Proposed Project

Health Endpoint	Age Range ¹	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)	(%)	
Respiratory PM _{2.5}				
Emergency Room Visits, Asthma	0-99	0.98	0.0053	18,419
Hospital Admissions, Asthma	0-64	0.065	0.0035	1,846
Hospital Admissions, All Respiratory	65-99	0.29	0.0015	19,644
Cardiovascular PM _{2.5}				
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65-99	0.16	0.00068	24,037
Acute Myocardial Infarction, Nonfatal	18-24	0.000083	0.0022	4
Acute Myocardial Infarction, Nonfatal	25-44	0.0076	0.0025	308
Acute Myocardial Infarction, Nonfatal	45-54	0.018	0.0025	741
Acute Myocardial Infarction, Nonfatal	55-64	0.030	0.0024	1,239
Acute Myocardial Infarction, Nonfatal	65-99	0.11	0.0021	5,052
Mortality PM _{2.5}				
Mortality, All Cause	30-99	2.0	0.0044	44,766
Respiratory Ozone				
Hospital Admissions, All Respiratory	65-99	0.070	0.00036	19,644
Emergency Room Visits, Asthma	0-17	0.41	0.0071	5,859
Emergency Room Visits, Asthma	18-99	0.64	0.0051	12,560
Mortality Ozone				
Mortality, Non-Accidental	0-99	0.046	0.00015	30,386

- 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.

Source: Sac Metro Air District Minor Project Health Effects Screening Tool, Version 2. Published June 2020

Based on modeling conducted, as demonstrated in Table 6, use of Tier 4 final construction equipment for all construction activities would ensure that DPM emissions from construction equipment do not result in increased health risks to nearby receptors in excess of SMAQMD's standards. Consequently, implementation of the following mitigation measure would reduce impacts related to exposing nearby sensitive receptors to substantial pollutant concentrations to a *less-than-significant* level.

Table 6 Maximum Mitigated Cancer Risk and Hazard Index Associated with Project Construction DPM			
	Cancer Risk (per million persons)	Acute Hazard Index	Chronic Hazard Index
Proposed Project	8.26	0.00	0.009
Thresholds of Significance	10	1.0	1.0
Exceed Thresholds?	NO	NO	NO
<i>Source: AERMOD and HARP 2 RAST, August 2024 (see Appendix A).</i>			

III-1 Prior to any ground disturbing activities, the project applicant shall show on project improvement plans via notation that the contractor shall ensure that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction of the proposed project, including owned, leased, and subcontractor vehicles, shall be Tier 4 final off-road construction equipment. In addition, all off-road equipment operating at the construction site must be maintained in proper working condition according to manufacturer's specifications.

Idling shall be limited to five minutes or less in accordance with the In-Use Off-Road Diesel Vehicle Regulation as required by CARB. Clear signage regarding idling restrictions shall be placed at the entrances to the construction site.

Portable equipment over 50 horsepower must have either a valid SMAQMD Permit to Operate (PTO) or a valid statewide Portable Equipment Registration Program (PERP) placard and sticker issued by CARB.

The measures shall be reflected on project improvement plans, subject to review and approval by the City of Sacramento Community Development Department.

- d. Pollutants of principal concern include emissions leading to odors, emission of dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in sections "a" through "c" above. Therefore, the following discussion focuses on emissions of odors and dust.

Odors

While offensive odors rarely cause physical harm, they can be unpleasant, leading to considerable annoyance and distress among the public and can generate citizen complaints to local governments and air districts. Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and

the variety of odor sources, quantitatively determining the presence of a significant odor impact is difficult. Typical odor-generating land uses include, but are not limited to, wastewater treatment plants, landfills, and composting facilities. The proposed project would not introduce any such land uses and is not located in the vicinity of any such existing or planned land uses.

Construction activities often include diesel fueled equipment and heavy-duty trucks, which could create odors associated with diesel fumes that may be considered objectionable. However, as discussed above, construction activities would be temporary, and operation of construction equipment adjacent to existing residential and school uses would be restricted to the hours of 7:00 AM to 6:00 PM Monday through Saturday, and 9:00 AM to 6:00 PM Sundays and holidays, pursuant to Sacramento Municipal Code Section 8.60.060. Project construction would also be required to comply with all applicable SMAQMD rules and regulations, particularly associated with permitting of air pollutant sources. The aforementioned regulations would help to minimize air pollutant emissions as well as any associated odors. Accordingly, substantial objectionable odors would not be expected to occur during construction activities.

Dust

As noted previously, construction of the proposed project is required to comply with all applicable SMAQMD rules and regulations, including, but not limited to, Rule 403 (Fugitive Dust) and Rule 404 (Particulate Matter). Furthermore, all projects within Sacramento County are required to implement the SMAQMD's Basic Construction Emission Control Practices (BCECP). Compliance with SMAQMD rules and regulations and BCECP would help to ensure that dust is minimized during project construction. Following project construction, vehicles operating within the project site would be limited to paved areas of the site, which would not have the potential to create substantial dust emissions. Thus, project operations would not include sources of dust that could adversely affect a substantial number of people.

Conclusion

For the reasons discussed above, construction and operation of the proposed project would not result in emissions, such as those leading to odors and/or dust, that would adversely affect a substantial number of people, and a ***less-than-significant*** impact would occur.

IV. BIOLOGICAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial 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?	☐	×	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	×	☐
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?	☐	☐	×	☐
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	×	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	×	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	×

Discussion

- a. Currently, the project site is undeveloped, and is dominated by ruderal grasses. The project site is relatively flat with slight undulations.

Special-status species include those plant and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal and State Endangered Species Acts. Both acts afford protection to listed and proposed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, CDFW Fully Protected Species, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, sensitive species included in USFWS Recovery Plans, and CDFW special-status invertebrates are all considered special-status species.

Although CDFW Species of Special Concern generally do not have special legal status, they are given special consideration under CEQA. In addition to regulations for special-status species, most birds in the U.S., including non-status species, are protected by the Migratory Bird Treaty Act (MBTA) of 1918. Under the MBTA, destroying active nests, eggs, and young is illegal. In addition, plant species on California Native Plant Society (CNPS) Lists 1 and 2 are considered special-status plant species and are protected under CEQA.

Raney Planning and Management, Inc. conducted a search of published records of special-status plant and wildlife species for the Clarksburg United States Geological Survey (USGS) 7.5" quadrangle, in which the project site is located, and for the eight

surrounding quadrangles, using the California Natural Diversity Data Base (CNDDB) Rarefind 5 application. The intent of the database review was to identify documented occurrences of special-status species in the vicinity of the project area, to determine their locations relative to the project site, and to identify habitats suitable for special-status species within the site. The results of the CNDDB search are discussed below.

Special-Status Plants

The project site is currently undeveloped and consists entirely of ruderal grasses, which are regularly mowed for weed abatement. The project site is located within an urban area and is surrounded by existing development.

Based on the results of the CNDDB search, a total of 30 special-status plant species have been recorded within the project region. However, due to the project site's routine disturbance associated with weed abatement activities, and surrounding development that has occurred as part of the buildout of the project area, none of the identified special-status plant species with potential to occur in the surrounding environs would occur on-site, as the site lacks suitable aquatic habitats (such as marshes or vernal pools) or suitable substrates (such as alkaline soils) to accommodate such species. Therefore, the proposed project would not substantially degrade the quality of the environment and reduce habitat in a manner that would reduce a threatened or endangered plant species' population to below self-sustaining levels.

Special-Status Wildlife

According to the CNDDB results, 32 special-status wildlife species have previously been documented within the region. Of the 32 special-status wildlife species, 31 species would not have the potential to occur on-site, due to the lack of suitable habitat (i.e., aquatic, riparian, woodland, and/or coastal habitat). For example, due to the lack of on-site aquatic resources, potential impacts as a result of the proposed project would not occur to green sturgeon, Sacramento perch, northwestern pond turtle, vernal pool fairy shrimp, conservancy fairy shrimp, delta smelt, vernal pool tadpole shrimp, steelhead, chinook salmon, longfin smelt, Sacramento splittail or giant garter snake, as the project site does not contain requisite flowing waters or vernal pools. Therefore, although identified in the CNDDB query conducted as part of this IS/MND, the foregoing special-status species would not be significantly impacted by the proposed project. In addition, the project site's surrounding development further reduces the likelihood of wildlife species, including those with special status, to occur on-site.

Of the special-status wildlife species identified by CNDDB, only the burrowing owl has marginal potential to occur on-site due to the presence of limited nesting habitats. The burrowing owl, which is a Species of Special Concern under the California Fish and Game Code (CFGF), typically occupies abandoned ground burrows created by California ground squirrels. As such, while the potential for burrowing owls to occur on-site is unlikely due to the routine mowing of the project site for weed abatement and the adjacent existing development, the potential exists for the species to be present prior to project construction.

In addition, trees along the project site boundaries and in the project vicinity have the potential to provide nesting habitat for migratory birds and raptors protected under the CFGF Section 3503 and the federal MBTA of 1918 (Title 16 of U.S.C. Sections 703-711). Both the CFGF and MBTA prohibit the intentional killing, collecting, or trapping of covered species, including their active nests (those with eggs or young). Therefore, in the event

that project construction activities occur during the nesting season, the proposed project could potentially cause nest abandonment due to associated construction noise, and a potentially significant impact could occur.

Conclusion

Based on the above, implementation of the proposed project could potentially affect burrowing owl and other nesting migratory birds and raptors. Thus, the proposed project could have an adverse effect, either directly or through habitat modifications, on species identified as special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS, and a **potentially significant** impact could result.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

Burrowing Owl

IV-1

A preconstruction survey for burrowing owls should be conducted according to the California Department of Fish and Wildlife (CDFW) 2012 Staff Report on Burrowing Owl Mitigation, and shall include all potential burrowing owl habitat within 500 feet of the project. Portions of the survey area located on private land shall be surveyed from all publicly accessible areas. A written summary of the survey results shall be submitted to the City of Sacramento Community Development Department before any construction permits are issued. If burrowing owl are not detected during pre-construction surveys, further mitigation is not required. If active burrowing owl burrows are found, the following measures shall be implemented at the project site:

- During the non-breeding season (September 1 through January 31), the biologist shall establish a 160-foot environmental sensitive area (ESA) around the burrow. During the breeding season (February 1 through August 31), the biologist shall establish a 300-foot ESA around the burrow in consultation with CDFW.*
- The size of the ESA may be reduced if the biologist monitors the construction activities and determines that disturbance to the burrowing owl is not occurring. Reduction of ESA size depends on the location of the burrow relative to the proposed disturbance area, project activities during the time the burrow is active, and other project-specific factors.*
- If the burrow is located within the construction zone and it is during the non-breeding season, the burrowing owl shall be passively excluded from the burrow using one-way doors, as described in the Exclusion Plan of Appendix E of the CDFW's 2012 Staff Report on Burrowing Owl Mitigation.*
- If the burrow is located within the construction zone and it is during the breeding season, the burrowing owl shall only be passively excluded if it has been confirmed that the owl has not begun egg laying and incubation, the clutch was unsuccessful, or juveniles from the occupied burrows are foraging independently and are capable of independent survival.*

Nesting Birds and Raptors

IV-2

If construction activities on the project site are to begin during the nesting season for raptors or other protected bird species in the region (generally February 15-September 15), a qualified biologist shall be retained by the project applicant to conduct pre-construction surveys in areas of suitable nesting habitat for common raptors and other bird species protected by the MBTA or California Fish and Game Code located within 500 feet of project activity, as accessible. Surveys shall be conducted no more than 10 days before ground disturbance is expected to occur. The pre-construction surveys shall be submitted to the City's Community Development Department. If active nests are not found, further mitigation is not required. If active nests are found, the construction contractor shall avoid impacts on such nests by establishing a no-disturbance buffer around the nest. The appropriate buffer size for all nesting birds shall be determined by a qualified biologist, but shall extend at least 50 feet from the nest. Buffer size will vary depending on site-specific conditions, the species of nesting bird, nature of the project activity, the extent of existing disturbance in the area, visibility of the disturbance from the nest site, and other relevant circumstances.

Construction activity shall not occur within the buffer area of an active nest until a qualified biologist confirms that the chicks have fledged and are no longer dependent on the nest, or the nesting cycle has otherwise completed. Monitoring of the nest by a qualified biologist during construction activities shall be required if the activity has the potential to adversely affect the nest. The qualified biologist shall determine the status of the nest at least weekly during the nesting season. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases.

- b,c. Jurisdictional waters include rivers, creeks, and drainages that have a defined bed and bank and which, at the very least, carry ephemeral flows. Jurisdictional waters also include lakes, ponds, reservoirs, and wetlands.

According to the USFWS National Wetlands Inventory, the project site does not contain any existing wetlands or other waters of the U.S. or State, or any riparian habitat or sensitive natural communities.¹¹ The site consists primarily of ruderal grasses that are regularly disked. Therefore, impacts related to having a substantial adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS would be less than significant. In addition, the proposed project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

¹¹ U.S. Fish and Wildlife Service. *National Wetlands Inventory*. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed August 2024.

Based on the above, implementation of the proposed project would have a ***less-than-significant*** impact on any riparian habitat, State or federally protected wetlands, or other sensitive natural community identified by local or regional plans, policies, or regulations.

- d. Movement corridors or landscape linkages are defined as areas that allow for the movement of species from one area of suitable habitat to another. A linkage can vary from a narrow strip of habitat that only functions as a conduit for movement (i.e., a corridor) or a large area of intact habitat that is used for movement, dispersal, and other life functions such as foraging and breeding. Many wildlife linkages are broad areas of regional movement corridors for wildlife that generally includes a wide swath of land used for movement between two or more core areas for multiple regional species.

The project site is surrounded by existing development, which would provide a significant barrier to dispersal of native wildlife travelling to and from the site. Most current animal movements on the project site would likely be local movements within the site and its immediate vicinity rather than regional movements. As such, the project would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites. Thus, a ***less-than-significant*** impact would occur.

- e. Sacramento City Code, Chapter 12.56, establishes guidelines for the conservation, protection, removal, and replacement of both City trees and private protected trees. Pursuant to Section 12.56.020, a private protected tree meets at least one of the following criteria:
- A tree that is designated by City Council resolution to have special historical value, special environmental value, or significant community benefit, and is located on private property;
 - Any native Valley Oak (*Quercus lobata*), Blue Oak (*Quercus douglasii*), Interior Live Oak (*Quercus wislizenii*), Coast Live Oak (*Quercus agrifolia*), California Buckeye (*Aesculus californica*), or California Sycamore (*Platanus racemosa*), that has a diameter at standard height (DSH) of 12 inches or more, and is located on private property;
 - A tree that has a DSH of 24 inches or more located on private property that:
 - Is an undeveloped lot; or
 - Does not include any single unit or duplex dwellings; or
 - A tree that has a DSH of 32 inches or more located on private property that includes any single unit or duplex dwellings.

When circumstances do not allow for retention of trees, permits are required to remove City trees or private protected trees that are within the City's jurisdiction. In addition, City Code Section 12.56.050, Tree Permits, states that no person shall perform regulated work without a tree permit. The Tree Permit application requires a statement detailing the nature and necessity for the proposed regulated work and the location of the proposed work for evaluation and approval by the City Council.

As part of the Pre-Development Arborist Report, Tree Inventory, and Protection Plan, California Tree and Landscape Consulting, Inc. conducted a site survey on July 15, 2024 to evaluate 14 trees located along the project site boundaries. According to California Tree and Landscape Consulting, Inc, 10 of the surveyed trees were determined to be located

off-site, and four have the potential to be located on-site. One potential on-site tree and two off-site trees are considered private protected under City Code Chapter 12.56 (see Appendix B). The remaining trees are not protected pursuant to City Code Chapter 12.56.

While trees are not proposed for removal, construction activities associated with the proposed project could adversely impact existing private protected or heritage trees. The City requires a Tree Permit to perform any activity, not including routine maintenance, that could adversely impact the health of a private protected tree. To address the potential impact, the proposed project would be required to obtain a Tree Permit in accordance with the requirements set forth in Sacramento City Code Chapter 12.56, pay all applicable fees, and comply with the provisions set forth therein by said permit. Additionally, the proposed project would be required to implement all tree protection measures included in the arborist report.

Based on the above, without compliance with requirements set forth by Sacramento City Code Chapter 12.56 or recommendations included in the arborist report, development of the proposed project could conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance, and a **potentially significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

IV-3 *Prior to issuance of Grading Permits, the grading plans shall note tree protection requirements stated within the Arborist Report prepared for the project. The measures shall be reflected on the grading plans, subject to review and approval by the City's Community Development Department.*

IV-4 *Prior to issuance of Grading Permits, the project applicant shall comply with tree permit requirements in effect at the time of project approval for removal, pruning, or soil disturbance within the canopy dripline of a private protected tree. The measures shall be reflected on the grading plans, subject to review and approval by the City's Community Development Department. If tree removal is proposed, all removal activities would be subject to the guidelines set forth in Chapter 12.56, Tree Planting, Maintenance, and Conservation, of the Sacramento City Code, which requires the acquisition of a Tree Removal Permit prior to the removal of any tree.*

- f. The project site is not located within an area that is subject to an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. Therefore, the proposed project would have **no impact** related to a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.

V. CULTURAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	✗	☐	☐
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	☐	✗	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries.	☐	✗	☐	☐

Discussion

- a-c. Historical resources are features that are associated with the lives of historically important persons and/or historically significant events, that embody the distinctive characteristics of a type, period, region or method of construction, or that have yielded, or may be likely to yield, information important to the pre-history or history of the local area, California, or the nation. Examples of typical historical resources include, but are not limited to, buildings, farmsteads, rail lines, bridges, and trash scatters containing objects such as colored glass and ceramics. According to the Master EIR, the majority of the historic resources and landmarks in the City are located within the Central City grid, near the confluence of the Sacramento and American rivers. Specifically, the City has identified over 800 individually landmarked historic and cultural resources. However, the project site is located outside of the City of Sacramento's Central City grid area.

On May 13, 2024, the North Central Information Center (NCIC) performed a records search of the California Historic Resources Information System (CHRIS) for cultural resource site records and survey reports within the proposed project area. The CHRIS search concluded that the project site does not contain any recorded archaeological resources, historic buildings or structures included in any lists of historic resources, nor does the project site contain Native American resources. The CHRIS search also concluded that a low potential exists for unrecorded historic-period cultural resources to be located within the project area. However, according to the CHRIS search, a moderate potential exists for unrecorded Native American resources to be located within the project area, as the project site is located within the Sacramento River Tribal Cultural Landscape. On May 16, 2024, the Native American Heritage Commission (NAHC) conducted a records search of the Sacred Lands File (SLF) which indicated that archaeological and other cultural resources are not known to be present in the project vicinity.

As previously discussed, the project site is undeveloped and is regularly disked. While historic resources have not been recorded at the project site, the potential exists for resources to occur. Thus, ground-disturbing activity related to project construction could encounter such resources. Therefore, the proposed project could cause a substantial adverse change in the significance of a historic or archaeological resource pursuant to CEQA Guidelines Section 15064.5 and/or disturb human remains, including those interred outside of formal cemeteries during construction. Thus, impacts could be considered ***potentially significant***.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

V-1

Avoidance and Preservation Procedures in the Event of the Inadvertent Discovery of Cultural Resources

If cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural materials), and the construction contractor shall immediately notify the project's City representative. Avoidance and preservation in place is the preferred manner of mitigating impacts to cultural resources. This will be accomplished, if feasible, by several alternative means, including:

- *Planning construction to avoid archaeological sites and/or other cultural resources; incorporating cultural resources within parks, green-space or other open space; covering archaeological resources; deeding a cultural resource to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity.*
- *Recommendations for avoidance of cultural resources will be reviewed by the City representative and other appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project site to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource.*
- *If the discovered cultural resource can be avoided, the construction contractor(s), will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.*
- *The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area".*

If a cultural resource cannot be avoided, the following performance standard shall be met prior to continuance of construction and associated activities that may result in damage to or destruction of cultural resources:

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

- *If a cultural resource is determined to be eligible for listing in the CRHR, the City will avoid damaging effects to the resource in accordance with California PRC Section 21084.3, if feasible. The City shall coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) approved by the City. As part of the site investigation and resource assessment, the City and the archaeologist shall assess the significance of the find, make recommendations for further evaluation and treatment as necessary and provide proper management recommendations should potential impacts to the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record.*

V-2

Implement Procedures in the Event of the Inadvertent Discovery of Human Remains.

If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the following performance standards shall be met prior to implementing or continuing actions such as construction, which may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (HSC Section 7050.5[b]).

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

If the Coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the Coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant (MLD), in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in California PRC Section 5097.9 et seq.

VI. ENERGY.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	✗	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	✗	☐

Discussion

- a,b. A description of the currently adopted 2022 California Green Building Standards Code and the Building Energy Efficiency Standards, as well as discussions regarding the proposed project's potential effects related to energy demand during construction and operations are provided below.

California Green Building Standards Code

The 2022 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11) is a portion of the California Building Standards Code (CBSC) (CCR Title 24), which became effective on January 1, 2023. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The CALGreen Code standards regulate the method of use, properties, performance, types of materials used in construction, alteration repair, improvement, and rehabilitation of a structure or improvement to property. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of electric vehicle charging infrastructure in residential and non-residential structures;
- Reduction of indoor water use consumption through the establishment of maximum fixture water use rates;
- Outdoor landscaping compliance with the California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), or a local ordinance, whichever is more stringent, to reduce outdoor water use;
- Diversion of 65 percent of construction and demolition waste from landfills; and
- Mandatory use of low-pollutant emitting interior finish materials, such as paints, carpet, vinyl flooring, and particle board.

Building Energy Efficiency Standards

The 2022 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy-efficiency measures from the 2019 Building Energy Efficiency Standards, and went into effect starting January 1, 2023. The 2022 standards provide for additional efficiency improvements beyond the 2019 standards. The proposed project would be subject to all relevant provisions of the most recent update of the CBSC, including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code and Building Energy Efficiency Standards would ensure that the proposed structure would consume energy efficiently.

Construction Energy Use

Construction of the proposed project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the site where energy supply cannot be met through a hookup to the existing electricity grid. Project construction would not involve the use of natural gas appliances or equipment.

All construction equipment and operation thereof would be regulated pursuant to the CARB In-Use Off-Road Diesel Vehicle Regulation, which is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce GHG emissions. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to further reduce demand on oil and limit emissions associated with construction.

Based on the above, the temporary increase in energy use occurring during construction of the proposed project would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, the proposed project would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand.

Operational Energy Use

Following implementation of the proposed project, Sacramento Municipal Utility District would provide electricity to the project site. Energy use associated with operation of the proposed project would be typical of self-storage uses, requiring electricity for interior and exterior building lighting, heating, ventilation, and air conditioning (HVAC), electronic equipment, security systems, and more. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric equipment. In addition to on-site energy use, the proposed project would result in transportation energy use associated with vehicle trips generated by employee commutes and the movement of goods.

The proposed project would be subject to all relevant provisions of the most recent update of the CBSC, including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code, the Building Energy Efficiency Standards, and all applicable regulations included within the City's Climate Action & Adaption Plan (CAAP) would ensure that the proposed structures would consume energy efficiently through the incorporation of such features as efficient water heating systems, high-performance attics and walls, and high-efficacy lighting. Required compliance with the CBSC would ensure that the building energy use associated with the proposed project would not be wasteful, inefficient, or unnecessary. In addition, electricity supplied to the project by SMUD would comply with the State's Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement

by 2030. As a result, a portion of the electricity consumed during project operation would be generated from renewable sources and the proposed development would not use natural gas. With regard to transportation energy use, the proposed project would comply with all applicable regulations associated with vehicle efficiency and fuel economy. In addition, as discussed in Section XVII, Transportation, of this IS/MND, the proposed project is not anticipated to substantially increase vehicle miles traveled (VMT).

Conclusion

Based on the above, construction and operation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, a ***less-than-significant*** impact would occur.

VII. GEOLOGY AND SOILS.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. 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 based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	✗	☐
ii. Strong seismic ground shaking?	☐	☐	✗	☐
iii. Seismic-related ground failure, including liquefaction?	☐	✗	☐	☐
iv. Landslides?	☐	✗	☐	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	✗	☐
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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	✗	☐	☐
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	✗	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	✗
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	✗	☐	☐

Discussion

ai-ii. According to the California Geological Survey, the project site is not located within an Alquist-Priolo Earthquake Fault Zone.¹² Additionally, the Geotechnical Engineering Study prepared for the proposed project (see Appendix C)¹³ by Youngdahl Consulting Group, Inc. (Youngdahl) determined that known faults are not located at the project site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the lifetime of the proposed development would be low. However, Sacramento is located in a moderately seismically active region. The Master EIR indicates that ground shaking occurs periodically in Sacramento as a result of distant earthquakes. Although the project site is not located near any active or potentially active faults, strong ground shaking could occur at the project site during a major earthquake on any of the major regional faults.

The proposed building would be properly engineered in accordance with the CBSC, which includes engineering standards appropriate for the seismic area in which the project site is located. Structures built consistent with the CBSC should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse

¹² California Geological Survey. *Earthquake Zones of Required Investigation*. Available at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed July 2024.

¹³ Youngdahl Consulting Group, Inc. *Geotechnical Engineering Study for Banner Self-Storage Facility*. November 2023.

but with some structural as well as nonstructural damage. Issues related to fault rupture, seismic ground shaking, and seismically induced ground failure are addressed in the City's adopted Standard Specifications for Public Works Construction, which requires construction contractors to build in accordance with City standards related to structural integrity, thus, ensuring that erosion and unstable soil conditions do not occur as a result of construction. The Standard Specifications for Public Works Construction sets forth provisions that require contractors to be responsible for damage caused during construction and to be responsible for the repair of such damages (e.g., settling of adjacent land and structures). The proposed project would require heavy construction, and individual components used in the construction of the project would be constructed to industry-standard design specifications and requirements, including American Society for Testing and Materials (ASTM) standards.

Additionally, Chapter 15.20 of the Sacramento City Code adopts Title 24 of the Uniform Building Code (UBC) and mandates compliance; therefore, all new construction and modifications to existing structures within the City are subject to the requirements of the UBC. The UBC contains standards to ensure that all structures and infrastructure are constructed to minimize the impacts from seismic activity, to the extent feasible, including exposure of people or structures to substantial, adverse effects as a result of strong groundshaking, seismic-related ground failure, liquefaction, lateral spreading, landslides, or lurch cracking. As a result, seismic activity in the area of the proposed development would not expose people or structures to substantial, adverse effects as a result of strong groundshaking and seismic-related ground failure. Therefore, a **less-than-significant** impact would occur related to seismic surface rupture and strong seismic ground shaking.

a,iii,aiv,

c,d. The proposed project's potential effects related to liquefaction, landslides, lateral spreading, subsidence/settlement, and expansive soils are discussed in detail below.

Liquefaction and Settlement

Soil liquefaction results from loss of strength during cyclic loading, such as imposed by earthquakes. Soils most susceptible to liquefaction are clean, loose, saturated, uniformly graded fine sands below the groundwater table. Empirical evidence indicates that loose silty sands are also potentially liquefiable. When seismic ground shaking occurs, the soil is subjected to cyclic shear stresses that could cause excess hydrostatic pressures to develop. If excess hydrostatic pressures exceed the effective confining stress from the overlying soil, the sand may undergo deformation. If the sand undergoes virtually unlimited deformation without developing significant resistance, the sand is said to have liquefied, and if the sand consolidates or vents to the surface during and following liquefaction, ground settlement and surface deformation may occur.

An evaluation of earthquake induced settlement associated with liquefaction was conducted by Youngdahl as part of the Geotechnical Engineering Study prepared for the proposed project. Based on the cone penetration test (CPT) of the upper 50 feet of on-site soils, liquefaction/seismic settlements ranging from approximately one to two inches were calculated, with an overall average between four CPTs of approximately 1.7 inches. Additionally, the liquefaction potential index (LPI) was calculated to be between 1.7 and 4.1, depending on the triggering method, which is considered to be a low to high potential for liquefaction for the selected method. Lastly, the liquefaction severity number (LSN), which considers depth to liquefiable layers in respect to potential damage to surface layers, was calculated to be between one and nine, depending on triggering method,

which is considered to be a moderate to major liquefaction potential for the selected method. Based on the CPT findings, overall differential liquefaction settlement for the proposed structure would be between 0.5 and one inch in 50 feet. Therefore, given that on-site soils are susceptible to liquefaction, Youngdahl determined that liquefaction induced settlement may occur.

Based on the Geotechnical Engineering Study analysis, Youngdahl provided recommendations to prevent hazards related to liquefaction and settlement due to soft soils for the proposed project, including deep foundations, ground improvements, and conventional shallow or mat foundations. If the proposed project is not built in accordance with the recommendations included in the Geotechnical Engineering Study prepared by Youngdahl, the proposed project could result in potential hazard or risks related to liquefaction and settlement.

Landslides

Seismically-induced landslides are triggered by earthquake ground shaking. The risk of landslide hazard is greatest in areas with steep, unstable slopes. The project site and surrounding area is generally flat. Thus, the proposed project would not be subject to landslide risks.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water; typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. The project site, which is generally flat, is not located near any open faces that would be considered susceptible to lateral spreading. Therefore, the potential for lateral spreading to pose a risk to the proposed development is low.

Expansive Soils

Expansive soils shrink and swell as a result of moisture changes, which can cause heaving and cracking of slabs-on-grade, pavements, and structures founded on shallow foundations. Building damage due to moisture changes in expansive soils can be reduced by appropriate grading practices and using post-tensioned slab foundations or similarly stiffened foundation systems, which are designed to resist the deflections associated with soil expansion. The Geotechnical Engineering Study prepared for the proposed project conducted an expansion index test in the upper five feet of soil, which determined that the on-site soil consists of clay with moderate to high plasticity and is considered to have high expansion potential.

The proposed project would be required to comply with all applicable CBSC standards to ensure the structural integrity of the proposed structures. However, if the proposed project is not built in accordance with the recommendations included in the Geotechnical Engineering Study prepared by Youngdahl, the proposed project could result in potential hazard or risks related to expansive soils.

Conclusion

From a geotechnical standpoint, provided that the recommendations included in the Preliminary Geotechnical Exploration prepared for the proposed project are implemented into the project design and specifications, the geological and soil conditions on the site would be adequate to support development of the proposed project. However,

conformance with such recommendations cannot be ensured, and, as a result, a **potentially significant** impact could occur related to settlement, liquefaction, and/or expansive soils.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

VII-1 *Prior to issuance of grading permits, the grading plans shall incorporate the geotechnical recommendations specified in the Geotechnical Engineering Study prepared for the proposed project, including, but not limited to, ground improvements, foundation recommendations, retaining wall recommendations, drainage recommendations, design review, and construction monitoring. All grading and foundation plans for the development must be reviewed and approved by the City Engineer and Chief Building Official, or their representative(s), prior to issuance of grading and building permits in order to ensure that recommendations in the Geotechnical Engineering Study are properly incorporated and utilized in the project design.*

- b. During construction activities, topsoil would be exposed following site grading and prior to constructing building foundations. As a result, the potential for topsoil erosion would exist. Following development of the site, all exposed soils would be covered with impervious surfaces or landscaping and, thus, the potential for erosion to occur would not exist long-term.

As discussed further under in Section X, Hydrology and Water Quality, of this IS/MND, the City's NPDES permit requires applicants to show proof of coverage under the State's General Construction Permit prior to receipt of any construction permits. The State's General Construction Permit requires any project that would disturb more than one acre of land to prepare a Storm Water Pollution Prevention Plan (SWPPP). A SWPPP describes BMPs to control or minimize pollutants from entering stormwater and must address both grading/erosion impacts and non-point source pollution impacts of the development project. Additionally, in accordance with Sacramento City Code Section 15.88.250, City of Sacramento staff would require preparation of an Erosion and Sediment Control Plan that demonstrates how the proposed project would control surface runoff and erosion and retain sediment on the project site during project construction. The erosion control measures included in both the SWPPP, as required by Mitigation Measure X-1, and the Erosion and Sediment Control Plan would ensure that the proposed project would not result in substantial erosion or the loss of topsoil. Therefore, the proposed project would not result in substantial soil erosion or the loss of topsoil, and a **less-than-significant** impact would occur.

- e. The proposed project would connect to an existing sewer line located within Corporate Way. The construction or operation of septic tanks or other alternative wastewater disposal systems is not included as part of the proposed project. Therefore, **no impact** regarding the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems would occur.
- f. Paleontological resources include fossil remains, as well as fossil localities and formations, which have produced fossil material in other nearby areas. According to the

Master EIR, quaternary sediments of the Great Valley sequence, the geologic formation underlying the Sacramento Planning Area, include gravels and other alluvial sediments laid down by large river systems, which contain well-preserved vertebrate and plant fossils. Although discoveries of such resources have been made within the City in the past, the City is not considered sensitive for the presence of paleontological resources.

The project site does not contain any unique geologic features. However, based on past discoveries within the City's Planning Area, unknown paleontological resources could exist within the project area. Should previously unknown paleontological resources exist within the project area, ground-disturbing activity, associated with implementation of the proposed project would have the potential to disturb or destroy such features. Therefore, the proposed project could result in the direct or indirect destruction of a unique paleontological resource, and a **potentially significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

VII-2 *In the event that a paleontological resource is inadvertently discovered during project-related work, regardless of the depth of excavation or location, work shall be halted within 50 feet (15 meters) of the find and a qualified paleontologist (Society of Vertebrate Paleontology [SVP] 2010) and the City of Sacramento Community Development Department shall be notified. The resources shall be examined by the qualified paleontologist at the developer's expense, for the purpose of recording, protecting, or curating the discovery as appropriate. Construction activities could continue in other areas.*

If the find is determined to be significant under SVP criteria, the find shall be left in place without further disturbance, or if avoidance is not feasible, then additional work, such as fossil recovery excavation (salvage) and curation at a certified repository, such as the University of California Museum of Paleontology (UCMP), may be warranted and would be discussed in consultation with the City of Sacramento Community Development Department, and any other relevant regulatory agency, as appropriate. The qualified paleontologist shall submit to the City of Sacramento Community Development Department for review and approval a report of the findings and method of curation or protection of the resources.

VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	✗	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	✗	☐

Discussion

- a,b. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

Implementation of the proposed project would cumulatively contribute to increases of GHG emissions. Estimated GHG emissions attributable to future development would be primarily associated with increases of carbon dioxide (CO₂) and, to a lesser extent, other GHG pollutants, such as methane (CH₄) and nitrous oxide (N₂O) associated with area sources, mobile sources or vehicles, utilities (electricity), water usage, wastewater generation, and the generation of solid waste. The primary source of GHG emissions for the project would be mobile source emissions. The common unit of measurement for GHG is expressed in terms of annual metric tons of CO₂ equivalents (MTCO₂e/yr).

The proposed project would have the potential to generate air pollutants that may increase global climate change. SMAQMD has adopted thresholds of significance for GHG emissions during construction and operations of projects, which are discussed in further detail below.

Construction GHG Emissions

For construction-related GHG emissions, SMAQMD has adopted a threshold of significance of 1,100 MTCO₂e/yr. If construction of the proposed project would result in emissions that exceed 1,100 MTCO₂e/yr, then construction of the project could be considered to result in a potentially significant impact and mitigation measures would be required. The estimated unmitigated maximum construction-related emissions associated with the proposed project are presented in Table 7.

Table 7 Maximum Unmitigated On-Site Construction GHG Emissions (MTCO₂e/yr)		
GHG Emissions	Threshold of Significance	Exceeds Threshold?
443	1,100	NO
<i>Source: CalEEMod, July 2024 (see Appendix A).</i>		

As shown in the table, the maximum annual construction-related GHG emissions would be below the SMAQMD threshold of 1,100 MTCO₂e/yr. Therefore, project construction would not be considered to result in a cumulatively considerable contribution to global climate change.

Operational GHG Emissions

SMAQMD has adopted qualitative thresholds of significance for GHG emissions during operations of projects. However, SMAQMD's CEQA Guidelines note that where local jurisdictions have adopted thresholds or guidance for analyzing GHG emissions, the local thresholds should be used for the project analysis. The City of Sacramento has adopted a CAAP, which provides a jurisdiction-wide approach to the analysis of GHG emissions. The City's CAAP includes Citywide measures intended to reduce emissions from existing sources, as well as measures aimed at reducing emissions from future sources related to development within the City. Thus, the analysis provided herein is focused on the proposed project's consistency with the City's CAAP. Nonetheless, the estimated unmitigated maximum operational emissions associated with the proposed project are presented in Table 8 for informational purposes.

Table 8	
Unmitigated Annual Operational GHG Emissions (MTCO₂e/yr)	
Emission Source	Proposed Project Emissions
Mobile	2,536
Area	0.00
Energy	1,144
Water	200
Waste	270
Refrigerants	0.01
TOTAL ANNUAL GHG EMISSIONS	4,151
<i>Source: CalEEMod, July 2024 (see Appendix A).</i>	

Consistency with City of Sacramento CAAP

The City of Sacramento has integrated a CAAP into the City's 2040 General Plan. Potential impacts related to climate change from development within the City are assessed based on the project's compliance with the City's newly adopted CAAP reduction measures. The majority of the reduction measures set forth in the CAAP are citywide efforts in support of reducing overall citywide emissions of GHG and are not applicable to individual development projects. However, various measures related to new development within the City would directly apply to the proposed project. The project's general consistency with the applicable CAAP measures is discussed below.

Measure E-2 of the CAAP is intended to eliminate natural gas in new construction through the adoption of new regulations that mandate all-electric construction in new buildings within the City. Pursuant to Sacramento City Code Section 15.38.020, which includes local amendments to the CALGreen Code, new buildings three-stories or less constructed after January 1, 2023 shall be all-electric, and all new buildings constructed after January 1, 2026 shall be all-electric. The proposed project would be designed such that all project components are built all-electric in compliance with Sacramento City Code Section 15.38.030. Therefore, the proposed project would be consistent with Measure E-2 of the CAAP.

In addition, all internal roadways and pedestrian connections would be constructed in conformance with City standards. As such, the proposed project would generally comply with Action TR-1.2 of the CAAP.

Finally, by including LID, such as the proposed on-site bioretention basins, the proposed project would also generally comply with Action WW-1.4 of the CAAP.

The Master EIR concluded that buildout of the City's General Plan, including the project site, would not result in a conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. The proposed project would be consistent with the City's Commercial Mixed-Use General Plan land use designation for the site as well as the CAAP policies discussed above that are intended to reduce GHG emissions from buildout of the City's General Plan. Thus, GHG emissions from operation of the proposed project would be generally similar to what was previously analyzed in the Master EIR, and would be consistent with the CAAP.

Conclusion

Based on the above, the project would be consistent with the City's CAAP and policies intended to reduce GHG emissions. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Thus, a ***less-than-significant*** impact would occur.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	✗	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	☐	☐	✗	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	✗	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	✗
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	✗	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	✗	☐
g. Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires?	☐	☐	✗	☐

Discussion

- a. Projects that involve the routine transport, use, or disposal of hazardous materials are typically industrial in nature. As such, the proposed project's self-storage facility would not involve the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. On-site maintenance may involve the use of common cleaning products, fertilizers, and herbicides, any of which could contain potentially hazardous chemicals; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the amount anticipated to be used on the site, routine use of such products would not represent a substantial risk to public health or the environment. The developer would prohibit future customers from storing hazardous materials, including flammable or combustible items, such as gas, propane tanks, car batteries, drugs, or ammunition in self-storage units.¹⁴ Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and a **less-than-significant** impact would occur.
- b. The following discussion provides an analysis of potential hazards and hazardous materials associated with upset or accident conditions related to the proposed construction activities and existing on-site conditions.

¹⁴ ExtraSpace Storage. *What Can I Store in a Storage Unit*. Available at: <https://www.extraspace.com/self-storage/>. Accessed August 2024.

Construction Activities

Construction activities associated with the proposed project would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, the project contractor would be required to comply with all California Health and Safety Codes and local City ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Pursuant to California Health and Safety Code Section 25510(a), except as provided in subdivision (b), the handler or an employee, authorized representative, agent, or designee of a handler, shall, upon discovery, immediately report any release or threatened release of a hazardous material to the unified program agency (in the case of the proposed project, the Sacramento County Environmental Compliance Division) in accordance with the regulations adopted pursuant to this section. The handler or an employee, authorized representative, agent, or designee of the handler shall provide all State, city, or county fire or public health or safety personnel and emergency response personnel with access to the handler's facilities. In the case of the proposed project, the contractor is required to notify the Sacramento County Environmental Compliance Division in the event of an accidental release of a hazardous material, who would then monitor the conditions and recommend appropriate remediation measures. Compliance with such regulations would ensure that a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions during construction would not occur.

Existing On-Site Hazardous Materials

A Phase I Environmental Site Assessment (ESA) was prepared for the project site by GeoEngineers, Inc. for the purpose of identifying potential recognized environmental conditions (RECs) associated with the project site (see Appendix D).¹⁵ The Phase I ESA included a site reconnaissance; a review of historical documents of the project site; interviews of persons familiar with the project site and applicable local agencies; and a review of appropriate federal, State, and local regulatory agencies to reveal known hazardous waste sites or leaks or spills of hazardous materials at the project site or the project vicinity.

One adjacent facility, AT&T Mobility, located at 7405 Greenhaven Drive, has been listed on the Sacramento County Hazardous Materials Facility List due to the storage of hazardous materials at the facility. Releases have not been reported at the facility, and the Phase I ESA determined that nearby or adjacent sites do not have the potential to impact the project site.

Potential RECs identified within the project site included past agricultural uses and undocumented on-site soil piles, which are discussed in further detail below.

Past Agricultural Use

Currently, the project site consists of undeveloped, vacant land. Historical sources reviewed as part of the Phase I ESA indicate that the site was used for agricultural purposes (pasture) by 1937, and agricultural uses were terminated by 1993. Pesticide

¹⁵ GeoEngineers, Inc. *Phase I Environmental Site Assessment 1 Corporate Way Sacramento, California*. October 4, 2023.

residues have the potential to occur at the project site due to the site's past agricultural uses. According to the Phase I ESA, assuming that pesticides were applied in accordance with manufacturers' recommendations, the historical use of pesticides at the project site does not constitute an REC. Because the project site has not been used for agricultural purposes for many years, the concentrations of some chemicals may have attenuated. Additionally, the proposed project would result in asphalt-concrete or cement concrete surfaces overlaying the project site, which would prevent exposure to underlying soil. Lastly, the end use of the proposed project would include a self-storage facility, which would not introduce sensitive receptors to the project site other than the single manager's apartment. Thus, a less-than-significant impact would occur related to the past agricultural use of the project site.

Undocumented On-Site Soil Piles

During the site reconnaissance conducted as part of the Phase I ESA, several small soil piles were observed. According to the Phase I ESA, the soil piles included small amounts of non-hazardous refuse, which would not constitute a significant concern. Thus, a less-than-significant impact would occur related to the presence of undocumented soil piles located on-site.

Conclusion

Based on the above, operations of the proposed project would not create a significant hazard to the public or environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment, and a **less-than-significant** impact would occur.

- c. The project site is located immediately adjacent to Merryhill Preschool, and is therefore located within 0.25-mile of an existing school. However, as discussed above, evidence of RECs, controlled RECs or historical RECs was not identified in connection with the project site. In addition, operation of the site as a self-storage facility would not include any activities that would involve the routine transport, use, or disposal of hazardous material. As such, future operations at the project site would not emit any hazardous emissions, substances, or waste. Therefore, the project would result in a **less-than-significant** impact.
- d. Government Code Section 65962.5 requires the California Environmental Protection Agency to annually develop an updated Cortese List. The project site is not located on the Department of Toxic Substances Control's (DTSC's) Hazardous Waste and Substances Site List, which is a component of the Cortese List.¹⁶ In addition, the project site is not located on any of the other components of the Cortese List (i.e., the list of leaking underground storage tank sites from the State Water Resources Control Board's (SWRCB's) GeoTracker database, the list of solid waste disposal sites identified by the SWRCB, and the list of active Cease and Desist Orders [CDO] and Cleanup and Abatement Orders [CAO] from the SWRCB).¹⁷ Finally, as part of the Phase I ESA prepared for the project site, GeoEngineers, Inc. conducted a search of local, State, and federal agency databases regarding the project site and known contaminated sites in the immediate vicinity. According to the search, the project site is not located in the vicinity of any known contaminated sites. Thus, the project site is not located on a site that is

¹⁶ Department of Toxic Substances Control. *EnviroStor*. Available at: <https://dtsc.ca.gov/your-envirostor/>. Accessed August 2024.

¹⁷ GeoEngineers, Inc. *Phase I Environmental Site Assessment 1 Corporate Way, Sacramento, California*. October 4, 2023.

included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment associated with such, and **no impact** would occur.

- e. The nearest public airport to the project site is the Sacramento Executive Airport, located approximately 1.15 miles to the northeast. As a result, the project site is located within the Airport Influence Area. A discussion of noise-related impacts associated with the project site being located within the Sacramento Executive Airport Influence Area is provided in Section XIII, Noise. Therefore, the following discussion is focused on whether the proposed project would result in a safety hazard associated with the Sacramento Executive Airport for people working in the project area.

According to Figure 11 of the Sacramento Executive Airport Comprehensive Land Use Plan (ACLUP),¹⁸ the project site is located within Approach-Departure Zone 2. Warehousing and storage uses such as the proposed project are compatible with Approach-Departure Zone 2, with the provision that flammable or explosive material may not be stored above ground. As discussed above, hazardous material, including flammable or explosive material, would not be allowed to be stored within the self-storage facility. The intent of land use safety compatibility criteria is to minimize the risks associated with an off-airport aircraft accident or emergency landing, and the criteria focus on reducing the potential consequences of such events should they occur. The proposed project would be consistent with building height requirements pursuant to the ACLUP.

Based on the above, a **less-than-significant** impact could occur related to a safety hazard for people residing or working in the project area associated with the project being located within an airport land use plan or within two miles of a public airport or public use airport.

- f. The City participates in the multijurisdictional Sacramento County Local Hazard Mitigation Plan (LHMP), last updated in 2021.¹⁹ The purpose of the LHMP is to guide hazard mitigation planning to better protect the people and property of the County from the effects of hazard events. The Sacramento LHMP includes policies and programs for participating jurisdictions to implement that reduce the risk of hazards and protect public health, safety, and welfare.

As discussed in Section XVII, Transportation, of this EIR, the proposed project would comply with Sacramento 2040 General Plan policies and design standards, and, as a result, would not impair any emergency response or evacuation plans. The proposed project would not alter the existing roadway configuration in the project vicinity. Thus, the proposed project would not physically interfere with the LHMP, particularly with identified emergency routes. Therefore, the proposed project would not interfere with an emergency evacuation or response plan, and a **less-than-significant** impact would occur.

- g. Issues related to wildfire hazards are discussed in further detail in Section XX, Wildfire, of this Initial Study. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program, the project site is located within a Local Responsibility Area and is not located within a Very High Fire Hazard Severity

¹⁸ Airport Land Use Commission for Sacramento, Sutter, Yolo, and Yuba Counties. *Sacramento Executive Airport Comprehensive Land Use Plan*. Amended May 1999.

¹⁹ Sacramento County. *Local Hazard Mitigation Plan Update*. September 2021.

Zone.²⁰ Therefore, the proposed project would not expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires, and a ***less-than-significant*** impact would occur.

²⁰ California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Available at: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed August 2024.

X. HYDROLOGY AND WATER QUALITY.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	✗	☐	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	✗	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	✗	☐	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	✗	☐	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	✗	☐	☐
iv. Impede or redirect flood flows?	☐	☐	✗	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	✗
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	✗	☐

Discussion

- a, ci-ciii. The following discussion provides a summary of the proposed project's potential to violate water quality standards/waste discharge requirements, alter the drainage pattern of the site resulting in erosion or siltation, increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or otherwise degrade water quality during construction and operation.

Construction

During the early stages of construction activities, topsoil would be exposed due to grading and excavation of the site. After grading and prior to overlaying the ground with impervious surfaces and structures, the potential exists for wind and water to discharge sediment and/or urban pollutants into stormwater runoff, which could adversely affect water quality.

The City of Sacramento's Grading Ordinance requires that development projects comply with the requirements of the City's Stormwater Quality Improvement Plan (SQIP). The SQIP outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management Program. The City's Stormwater Management Program is based on the National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Discharge Permit. The comprehensive Stormwater Management Program includes pollution-reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

The SWRCB regulates stormwater discharges associated with construction activities where clearing, grading, or excavation results in land disturbance of one or more acres. The City's NPDES permit requires applicants to show proof of coverage under the State's General Construction Permit prior to receipt of any construction permits. The State's General Construction Permit requires any project that would disturb more than one acre of land to prepare a SWPPP. A SWPPP describes BMPs to control or minimize pollutants from entering stormwater and must address both grading/erosion impacts and non-point source pollution impacts of the development project.

With implementation of the required SWPPP and BMPs included therein, construction of the proposed project would not result in a violation of water quality standards and/or degradation of water quality. Final BMPs for the proposed project construction would be chosen in consultation with the applicable California Stormwater Quality Association Stormwater BMP Handbooks and Section 11 of the City's Development Standards, and implemented by the project contractor. Because the proposed project would disturb greater than one acre of land, the proposed project would be subject to the requirements of the State's General Construction Permit. Should the proposed project not include preparation and compliance with a SWPPP, a significant impact may occur.

Additionally, in accordance with Sacramento City Code Section 15.88.250, City of Sacramento staff would require preparation of an Erosion and Sediment Control Plan that demonstrates how the proposed project would control surface runoff and erosion and retain sediment on the project site during project construction. The Erosion and Sediment Control Plan would be required to be submitted concurrently with the final grading plan prepared for the proposed project.

Operations

Following project buildout, the surface of the site would be covered with either impervious surfaces or landscaped areas, and topsoil would no longer be exposed. As such, the potential for erosion and associated impacts to water quality would be reduced. However, the addition of impervious surfaces on the site would result in the generation of urban runoff during project operations, which could contain pollutants if the runoff comes into contact with vehicle fluids on parking surfaces and/or landscape fertilizers and herbicides. During the dry season, vehicles and other urban activities may release contaminants onto the impervious surfaces, where they would accumulate until the first storm event. During the initial storm event, or first flush, the concentrated pollutants would be transported by way of stormwater runoff from the site to the stormwater drainage system and eventually a downstream waterway. Typical urban pollutants that would likely be associated with the proposed project include sediment, pesticides, oil and grease, nutrients, metals, bacteria, and trash. In addition, stormwater runoff could cause soil erosion if not properly addressed, which would provide a more lucrative means of transport for pollutants to enter the waterways.

Following project construction, the project site, which is currently undeveloped and consists of ruderal grasses, would be developed to include approximately 1.7 acres of new impervious surfaces. Consistent with Chapter 13.16.120 of the Municipal Code, the post-development stormwater flows from the site would be required to be equal to or less than pre-development conditions. The proposed project would comply with Section 13.08.145, Mitigation of drainage impacts; design and procedures manual for water, sanitary sewer, storm drainage, and water quality facilities, of the Municipal Code, which requires the following:

“When property that contributes drainage to the storm drain system or combined sewer system is improved or developed, all stormwater and surface runoff drainage impacts resulting from the improvement or development shall be fully mitigated to ensure that the improvement or development does not affect the function of the storm drain system or combined sewer system, and that there is no increase in flooding or in water surface elevation that adversely affects individuals, streets, structures, infrastructure, or property.”

As such, a Drainage Technical Memorandum was prepared for the proposed project by TSD Engineering, Inc. (see Appendix E).²¹ As discussed within the Drainage Technical Memorandum, the project site is a part of the City’s master drainage basin Sump 142. On-site detention is required for the 100-year storm event, at a rate of 6,000 cubic feet (cf) per acre of increased impervious area. The total increased impervious area is 1.717 acres, which results in a required total of 10,305 cf of detention. The storage would be provided by the nine bioretention basins throughout the project site, as well as a 48-inch underground HDPE Storm Drain Detention Chamber (see Figure 7). The Sump 142 basin also requires that drainage flows off the project site be limited to 0.25 cubic feet per second (cfs) per acre of increased imperviousness. An orifice would be placed in the point-of-connection manhole, in order to limit the stormwater flow to the required level.

Measures that reduce or eliminate post-construction-related water quality problems range from source controls, such as reduced surface disturbance, to treatment of polluted runoff, such as detention or retention basins. The City’s SQIP and the Stormwater Quality Design Manual for the Sacramento Region include BMPs to be implemented to mitigate impacts from new development and redevelopment projects. Additionally, the City’s DOU recommends implementation of LID measures.

Proposed source control measures included as part of the proposed project would be designed consistent with the standards set forth in the Sacramento Region Stormwater Quality Design Manual. Finally, as established by Sacramento City Code Section 15.88.260, the proposed project would be required to prepare a Post-Construction Erosion and Sediment Control Plan, which would detail how the project would control surface runoff and retain sediment on-site after all proposed improvements and structures have been installed on-site. The Post-Construction Erosion and Sediment Control Plan would be required to be submitted to the City concurrently with the final grading plan prepared for the proposed project.

Based on the above, the proposed project is not anticipated to have a negative impact on the properties adjacent to the project site and would not adversely affect surface water quality.

Conclusion

Based on the above, impacts related to water quality would not occur during project operations. However, because a SWPPP has not yet been prepared for the proposed project, proper compliance with the aforementioned regulations cannot be ensured at this time, and the proposed project’s construction activities could violate water quality standards or waste discharge requirements or otherwise degrade water quality. Thus, the proposed project could violate water quality standards/waste discharge requirements, alter the drainage pattern of the site resulting in erosion or siltation, increase the rate or

²¹ TSD Engineering, Inc. *Drainage Technical Memo*. April 8, 2024.

amount of surface runoff in a manner which would result in flooding on- or off-site, contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or otherwise degrade water quality during construction, and a **potentially significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

X-1 *Prior to issuance of any grading permits, the contractor shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for review and approval by the Central Valley RWQCB. The contractor shall file the Notice of Intent (NOI) and associated fee to the SWRCB. The SWPPP shall serve as the framework for identification, assignment, and implementation of BMPs. The contractor shall implement BMPs to reduce pollutants in stormwater discharges to the maximum extent practicable. Construction (temporary) BMPs for the project may include, but are not limited to: fiber rolls, straw bale barrier, straw wattles, storm drain inlet protection, velocity dissipation devices, silt fences, wind erosion control, stabilized construction entrance, hydroseeding, revegetation techniques, and dust control measures. The SWPPP shall be submitted to both the City Director of Public Works, and the City Engineer for review and approval and shall remain on the project site during all phases of construction. Following implementation of the SWPPP, the contractor shall subsequently demonstrate the SWPPP's effectiveness and provide for necessary and appropriate revisions, modifications, and improvements to reduce pollutants in stormwater discharges to the maximum extent practicable.*

b,e. The City would be responsible for providing water to the project site. The City's water infrastructure network consists of two surface water treatment facilities, two pressure zones, and a supporting system of groundwater wells, pumping facilities, storage tanks, and distribution/transmission pipelines. According to the Master EIR, the City supplies domestic water from a combination of surface water and groundwater sources. The City is permitted to 326,800 acre-feet per year (AFY) of surface water diverted from the Sacramento and American rivers in 2030, while the City's average groundwater deliveries from 2006 to 2017 were approximately 17,932 AFY. The City's 2020 Urban Water Management Plan (UWMP) includes a water service reliability assessment of the City's projected supplies and demands during normal, single dry, and five consecutive dry years. Under the various water year types, the total annual water supply sources available are compared to the total annual projected water use for the City's water service area from 2025 to 2045 in five-year increments. The City is projected to have a surplus of water supplies in all water year types through 2045. The proposed project is consistent with the site's General Plan land use designation and would not generate an increase in water demand beyond what has already been anticipated in the Master EIR. As such, adequate capacity is expected to be available to serve the proposed project's water demands. Therefore, while a portion of the water supplied to the project site by the City would be obtained through groundwater resources, such groundwater usage has been anticipated and would not substantially deplete groundwater supplies within the project area.

The proposed project would result in an increase in on-site impervious surfaces, which would reduce the infiltration of groundwater as compared to existing conditions. However,

according to the Drainage Technical Memorandum prepared for the proposed project, soils underlying the project site have a hydrologic classification of Type C/D, which have a relatively low infiltration rate. Nonetheless, approximately 0.55-acre, or approximately 24 percent of the site, would remain as pervious surfaces, which would allow for the natural percolation of stormwater in those areas, which would continue to contribute to groundwater recharge similar to existing conditions. Furthermore, the proposed project would include the development of nine on-site bioretention basins, which would allow for the on-site infiltration of surface water to continue, and contribute to groundwater recharge. Therefore, the proposed project would not interfere substantially with groundwater recharge. Furthermore, the groundwater subbasin within which the project site is located is not currently in a state of overdraft.

Based on the above, the proposed project would result in a ***less-than-significant*** impact with respect to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project would impede sustainable groundwater management.

- civ. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) number 06013C0144G, the project site is classified as Zone X, defined by FEMA as an area not within a 100-year or 500-year floodplain, and has a reduced flood risk due to a levee.²² As such, the proposed project would not substantially impede or redirect flood flows, and a ***less-than-significant*** impact would occur.
- d. Tsunamis are defined as sea waves created by undersea fault movement, whereas a seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir. The project area is located approximately 80 miles from the Pacific Ocean and tsunamis typically affect coastlines and areas up to one-quarter mile inland. Due to the project's distance from the coast, the project site would not be exposed to flooding risks associated with tsunamis. Seiches do not pose a risk to the proposed project, as the project site is not located adjacent to a large, closed body of water. Furthermore, as noted above, the proposed project would not include development of any habitable structures within a Flood Hazard Zone. Based on the above, the proposed project would not pose a risk related to the release of pollutants due to project inundation due to flooding, tsunami, or seiche, and ***no impact*** would occur.

²² Federal Emergency Management Agency. *Flood Insurance Rate Maps 06013C0144G, Effective on 09/30/2015*. Available at: <https://msc.fema.gov/portal/search>. Accessed July 2024.

XI. LAND USE AND PLANNING.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	✗	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	✗	☐

Discussion

- a. A project risks dividing an established community if the project would introduce infrastructure or alter land use so as to change the land use conditions in the surrounding community, or isolate an existing land use. The project site does not contain existing housing, and the proposed project would be consistent with the commercial, quasi-public, and office uses in the vicinity of the site. The proposed project would not alter the existing general development trends in the area nor isolate an existing land use. As such, the proposed project would not physically divide an established community and a ***less-than-significant*** impact would occur.
- b. According to the 2040 General Plan, the site is designated as Commercial Mixed-Use. The site is zoned OB-EA-3-PUD. The proposed project would include a Rezone to C-2-EA-3-PUD. The Commercial Mixed-Use designation allows for a full range of commercial uses, attached residential dwelling units, and compatible public, quasi-public, and special uses. Furthermore, pursuant to Section IV of the Greenhaven Executive Park PUD Guidelines,²³ permitted uses in the C-2-PUD zone include, but are not limited to, office support uses, restaurants (excluding drive-in or fast-food), private club-social centers, banks (excluding drive-throughs), hotels, vehicle storage, mini storage, individual storage, and locker buildings.

As discussed throughout this Initial Study, the proposed project would not conflict with City policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the Sacramento City Code Chapter 12.56, Tree Planting, Maintenance, and Conservation, the City's noise standards, and applicable SWRCB regulations related to stormwater. This Initial Study includes mitigation to reduce any identified environmental impacts to less-than-significant levels. Therefore, the proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact and a ***less-than-significant*** impact would occur.

²³ City of Sacramento, California. *Greenhaven Executive Park Planned Unit Development Guidelines*. Revised July 14, 2016.

XII. MINERAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	✗
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	✗

Discussion

- a,b. According to the City of Sacramento's Master EIR, areas identified for new development, other than areas between SR 99 and SR 16 in the southeastern portion of the planning area and a narrow area east of the Sacramento Executive Airport, do not contain known mineral resources that would be of value to the region or residents of the State.²⁴ Therefore, **no impact** to mineral resources would occur as a result of development of the project.

²⁴ City of Sacramento. *Public Review Draft Master Environmental Impact Report Sacramento 2040 General Plan and Climate Action & Adaptation Plan* [pg. 4.7-4]. August 2023.

XIII. NOISE.

Would the project result in:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	×		☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	×	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	×	☐

Discussion

- a. The discussion below presents information regarding sensitive noise receptors in proximity to the project site, applicable noise standards, the existing noise environment, and the potential for the proposed project to result in noise impacts during project construction and operation. The following terms are referenced in the sections below:
- Decibel (dB): A unit of sound energy intensity. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response to the typical human ear at commonly encountered noise levels. All references to decibels (dB) in this report will be A-weighted unless noted otherwise.
 - Community Noise Equivalent Level (CNEL): The cumulative noise exposure over a 24-hour period. Weighting factors of +5 and +10 dBA are applied to the evening and nighttime periods, respectively, to account for the greater sensitivity of people to noise during those periods.
 - Day-Night Average Level (L_{dn}): The average sound level over a 24-hour day, with a +10 decibel weighing applied to noise occurring during nighttime (10:00 PM to 7:00 AM) hours.
 - Equivalent Sound Level (L_{eq}): The average sound level over a given time-period.
 - Maximum Sound Level (L_{max}): The maximum sound level over a given time-period.
 - Median Sound Level (L_{50}): The sound level exceeded 50 percent of the time over a given time-period.

Significance Criteria

Pursuant to City of Sacramento Municipal Code, Section 8.68.060, the proposed project, which shall be considered to be a “Stationary” noise source, shall not be permitted to generate noise levels exceeding 55 dBA L_{50} or 75 dBA L_{max} during daytime (7:00 AM to 10:00 PM) hours and 50 dBA L_{50} or 70 dBA L_{max} during nighttime (10:00 PM to 7:00 AM) hours at the adjacent noise sensitive receptors.

The City has not adopted any formal standard for evaluating temporary construction noise which occurs within allowable hours. Therefore, for short-term noise associated with project construction, the California Department of Transportation (Caltrans) increase criteria of 12 dBA is applied to existing sensitive receptors in the project vicinity. The 12

dBA increase is approximately equivalent to a doubling of sound energy and has historically been the standard of significance for Caltrans projects.

Sensitive Noise Receptors

Some land uses are considered more sensitive to noise than others, and, thus, are referred to as sensitive noise receptors. Land uses often associated with sensitive noise receptors generally include residences, schools, libraries, hospitals, and passive recreational areas. Noise sensitive land uses are typically given special attention in order to achieve protection from excessive noise. In the vicinity of the project site, the nearest existing noise sensitive land use is the Merryhill Preschool, located directly northwest of the project site.

Existing Noise Environment

The existing ambient noise environment at the project site is primarily defined by traffic noise emanating from Corporate Way, located north of the project site, and by adjacent commercial operations.

Project Construction Noise

During the construction of the proposed project, heavy equipment would be used for site grading, paving, and building construction, which would increase ambient noise levels in the project area when in use. Standard construction equipment, such as graders, backhoes, loaders, and trucks, would be used on-site. Noise levels would vary depending on the type of equipment used, how the equipment is operated, and how well the equipment is maintained. In addition, noise exposure at any single point outside the project site would vary depending on the proximity of construction activities to that point.

The noise increase during construction would be of short duration and would likely occur primarily during daytime hours. The City of Sacramento's Noise Ordinance (Section 8.60.060 of the Municipal Code) exempts construction activities from the City's noise standards, provided that construction takes place between the hours of 7:00 AM and 6:00 PM Monday through Saturday and 9:00 AM and 6:00 PM Sundays and holidays. The City of Sacramento has not adopted a formal standard for evaluating temporary construction noise which occurs within allowable hours. However, as discussed above, Caltrans defines a significant increase due to noise as an increase of 12 dBA over existing ambient noise levels.

As shown on Map ERC-5 of the 2040 General Plan, the project site is located within the 55 dBA noise contour. The maximum noise level for various types of construction equipment at a distance of 50 feet is presented in Table 9. As shown in Table 9, activities involved in construction would generate maximum noise levels ranging from 76 to 90 dB at a distance of 50 feet. An existing six-foot masonry soundwall is located along the northern property line, which would reduce construction noise at Merryhill Preschool as compared to the levels presented below in Table 9. However, due to Merryhill Preschool being located adjacent to the project site, the temporary increase in noise levels due to construction would still result in a temporary increase greater than 12 dBA over existing ambient noise levels. Thus, temporary noise increases associated with construction activities could be potentially significant.

Table 9	
Construction Equipment Noise	
Type of Equipment	Maximum Level, dB at 50 feet
Auger Drill Rig	84
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Generator	81
Jackhammer	89
Pneumatic Tools	85
<i>Source: Federal Highway Administration, Roadway Construction Noise Model User's Guide, January 2006.</i>	

Project Operational Noise

Noise generated during operations of the proposed project would consist of typical commercial noise and traffic noise, as discussed in further detail below.

On-Site Operational Noise

The proposed project would consist of a 152,625 self-storage facility, which would include 1,348 storage units, 900 sf of office/retail space, and an 890-sf on-site manager's apartment. The operation of self-storage facilities is not typically associated with high levels of noise production, and any operational noise produced by the self-storage facility would not be expected to significantly impact the adjacent sensitive receptor by generating noise in excess of 55 dBA L_{50} or 75 dBA L_{max} during daytime (7:00 AM to 10:00 PM) hours and 50 dBA L_{50} or 70 dBA L_{max} during nighttime (10:00 PM to 7:00 AM) hours.

Operational noise associated with the proposed project would be consistent with the adjacent existing commercial uses in the project vicinity. It should also be noted that with respect to potential interior noise level increases that could occur in the project vicinity as a result of the proposed project, standard residential construction (e.g., stucco siding, Sound Transmission Class [STC]-27 windows, door weather-stripping, exterior wall insulation, composition plywood roof) typically results in an exterior-to-interior noise reduction of approximately 25 dB with windows closed and approximately 15 dB with windows open. Given the exterior-to-interior noise reduction typically achieved from standard residential construction, interior noise levels at the nearest sensitive receptors, including Merryhill Preschool, are anticipated to be reduced.

Additionally, an existing six-foot masonry soundwall is located along the northern property line, which would reduce project operational noise at Merryhill Preschool. Moreover, the two loading docks, which would be the most significant operational noise source associated with the proposed project, would be located within the interior of the self-storage facility and the loading bay, which would provide access to the two interior loading dock spaces, would be located on the eastern side of the building, opposite of the project site from Merryhill Preschool. Lastly, the 2040 General Plan designates the site as Commercial Mixed-Use. Development of the site in accordance with the site's existing land use designation would result in noise levels anticipated by the Master EIR under buildout conditions. As such, noise level increases that could occur due to on-site noise

sources during project operation have been previously anticipated by the City, and thus would result in a less-than-significant impact.

Traffic Noise

With regard to noise level increases associated with traffic on Corporate Way, the Master EIR did not specifically evaluate potential ambient noise level increases along Corporate Way that could occur through buildout of the 2040 General Plan. However, Table 4.11-1 of the Master EIR includes evaluation of potential noise level increases along Greenhaven Drive from Gloria Drive to Florin Road, which is located approximately 2,100 feet to the northeast of the project site. In contrast to Corporate Way, which is a two-lane local commercial street, the aforementioned segment of Greenhaven Drive is a four-lane arterial road upon which higher traffic volumes travel. Pursuant to the Master EIR, noise levels generated by traffic on the segment of Greenhaven Drive to the northeast of the site would not increase under 2040 Future conditions from 58.9 dBA CNEL under Baseline conditions.

The proposed project is consistent with the General Plan land use designation, and, therefore, potential traffic increases as a result of the proposed project have been anticipated. In addition, due to the nature of the proposed project, substantial daily vehicle trips would not be generated. For example, pursuant to the ITE Trip Generation Handbook, the 152,625-sf self-storage facility would be anticipated to generate approximately 383 daily trips. Conversely, a 152,625-sf commercial use such as a shopping center would be anticipated to generate approximately 6,533 daily trips. As such, substantial traffic noise impacts would not occur. Therefore, the increased traffic noise generated from implementation of the proposed project would result in a less-than-significant impact.

Conclusion

Noise associated with operation of the proposed project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of the standards established in the City's General Plan, or applicable standards of other agencies. However, noise associated with construction of the proposed project would result in a temporary increase greater than 12 dBA over existing ambient noise levels. Thus, a **potentially significant** impact related to the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

- XIII-1 Prior to approval of grading and/or building permits, the City shall establish the following as conditions of approval for any permit that results in the use of construction equipment:*
- *Construction hours shall be limited to 7:00 AM to 6:00 PM Monday through Saturday and between 9:00 AM and 6:00 PM on Sunday. Construction outside of these hours may be approved through a development permit based on a site-specific "construction noise mitigation plan" and a finding by the Director of Community*

Development or their designee that the construction noise mitigation plan is adequate to prevent excessive noise disturbance of affected residential uses. Because it is anticipated that certain construction activities (such as continuous pours of concrete foundations) may require work outside normally permitted construction hours (e.g., overnight), the project's Development Permit would allow for such construction activities, subject to conditions of approval, including performance standards, imposed by the City to limit noise impacts.

- Construction equipment and vehicles shall be fitted with efficient, properly operating noise suppression devices (e.g., mufflers, silencers, wraps) that meet or exceed manufacture specifications. Mufflers and noise suppressors shall be properly maintained and tuned to ensure proper fit, function and minimization of noise.*
- Impact tools and equipment that is particularly loud (e.g., concrete saws) shall have the working area/impact area shrouded or shielded, with intake and exhaust ports on power equipment muffled or suppressed. The use of temporary or portable, application-specific noise shields or barriers, or temporary construction barriers adjacent to or at the boundary of the construction area may be necessary to reduce associated noise levels.*
- Construction equipment shall not be idled for extended periods (e.g., five minutes or longer) of time in the immediate vicinity of noise-sensitive receptors.*
- Stationary noise-generating equipment such as air compressors or portable power generators shall be located as far as possible from sensitive receptors. Temporary noise barriers shall be constructed, if needed, to screen stationary noise-generating equipment when located near adjoining noise-sensitive land uses.*

Proof of compliance shall be submitted to the City of Sacramento Development Department for review and approval.

- b. Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration measures in terms of peak particle velocities (PPV) in inches per second (in/sec). Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of PPV. As presented in Table 10, Caltrans considers the threshold for architectural damage to structures to be 0.20 in/sec PPV. A threshold of 0.2 in/sec PPV is considered to be a reasonable threshold for short-term construction projects.

For structural damage, the Caltrans uses a vibration limit of 0.5 inches/second, peak particle velocity (in/sec ppv), for buildings structurally sound and designed to modern engineering standards; 0.2 in/sec ppv for buildings that are found to be structurally sound but where structural damage is a major concern; and a conservative limit of 0.08 in/sec ppv for ancient buildings or buildings that are documented to be structurally weakened.²⁵ Accordingly, the City uses a threshold of significance for vibration levels of 0.5 in/sec ppv

²⁵ California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*. September 2013.

for residential and commercial areas, and 0.2 in/sec ppv for historic buildings and archaeological sites. Given that the age of the Merryhill Preschool building adjacent to the project site is unknown, a vibration limit of 0.2 in/sec ppv would be considered the conservative threshold for architectural damage.

Table 10			
Effects of Vibration on People and Buildings			
PPV		Human Reaction	Effect on Buildings
mm/sec	in/sec		
0.15-0.30	0.006-0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause damage of any type
2.0	0.08	Vibrations readily perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
2.5	0.10	Level at which continuous vibrations begin to annoy people	Virtually no risk of “architectural” damage to normal buildings
5.0	0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations)	Threshold at which there is a risk of “architectural” damage to normal dwelling - houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize “architectural” damage
10-15	0.4-0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage
Source: Transportation Related Earthborne Vibrations. Caltrans. TAV-02-01-R9601. February 2002.			

Project operations would include on-site activities such as vehicle circulation, loading and unloading activities within the proposed self-storage building, parking lot movements, and HVAC equipment. Typically, operations associated with the proposed land use do not generate appreciable vibration.

During project construction, heavy equipment would be used for grading, excavation, paving, and building construction, which would generate localized vibration in the immediate vicinity of construction. The range of vibration source levels for construction equipment commonly used in similar projects are shown in Table 11.

As shown in Table 11, with the exception of vibratory compactors, the vibration levels of typical construction equipment are less than the 0.2 in/sec threshold at distance of 25 feet. However, the proposed project could include the use of vibratory compactors during construction, which would occur at less than 25 feet from the Merryhill Preschool. Therefore, use of vibratory compactors could cause vibrations in excess of 0.2 in/sec at the adjacent school, and a **potentially significant** impact could occur.

Table 11 Vibration Levels for Various Construction Equipment			
Type of Equipment	PPV at 25 feet (inches/second)	PPV at 50 feet (inches/second)	PPV at 100 feet (inches/second)
Large Bulldozer	0.089	0.031	0.011
Loaded Trucks	0.076	0.027	0.010
Small Bulldozer	0.003	0.001	0.000
Auger/drill Rigs	0.089	0.031	0.011
Jackhammer	0.035	0.012	0.004
Vibratory Hammer	0.070	0.025	0.009
Vibratory Compactor/roller	0.210 (< 0.20 at 26 feet)	0.074	0.026
Source: Transit Noise and Vibration Impact Assessment Guidelines. Federal Transit Administration. May 2006.			

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

XIII-2 Any compaction required less than 26 feet from the Merryhill Preschool adjacent to the project site shall be accomplished by using static drum rollers, rather than vibratory compactors, which use weight instead of vibrations to achieve soil compaction. As an alternative to this requirement, preconstruction crack documentation and construction vibration monitoring could be conducted to ensure that construction vibrations do not cause damage to any adjacent structures. The above requirements shall be included via notation on any future improvement plans approved for the proposed project to the satisfaction of the City's Community Development Department.

- c. The nearest airport to the site is the Sacramento Executive Airport, located approximately 1.15 miles northeast of the project site. As such, the site is included within the ACLUP. The project site is located approximately 0.85-mile outside the 65 dBA CNEL airport noise contours. Therefore, noise levels related to the Sacramento Executive Airport at the project site would be within the City's criteria for the normal acceptable noise environment of 70 dBA for commercial office buildings, pursuant to General Plan Table ERC-1. Additionally, the ACLUP does not include noise restrictions on warehouse and storage uses within the Airport Influence Area. Because the project site is located outside the 65 dBA CNEL airport noise contours, development of the proposed project would not expose people residing or working in the project area to excessive noise levels. Therefore, a ***less-than-significant*** impact would occur.

XIV. POPULATION AND HOUSING.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	☐	☐	✗	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	✗	☐

Discussion

- a,b. The proposed project would include the development of a 152,625-sf self-storage facility with an office and on-site manager's apartment and would not include the extension of major infrastructure associated with water, sanitary sewer, storm drainage, or energy services. While the proposed project would include one on-site manager's apartment, the employee to be hired and reside in the apartment would likely be an existing resident of Sacramento, and the proposed project would not result in additional residents within the City. Thus, substantial population growth would not occur. Additionally, the proposed project would not include the construction of new housing, with the exception of the single manager's apartment, or demolition of existing housing. Furthermore, because the proposed project is consistent with the project site's land use designation, impacts associated with buildout of the site were generally evaluated in the Master EIR, including any impacts associated with indirect population growth. Thus, any minor increase in population resulting from implementation of the proposed project has been previously anticipated by the City.

Based on the above, the proposed project would not induce substantial unplanned population growth in the project area, either directly or indirectly, or displace substantial numbers of existing people or housing. Therefore, the project would result in a ***less-than-significant*** impact.

XV. PUBLIC SERVICES.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Fire protection?	☐	☐	✗	☐
b. Police protection?	☐	☐	✗	☐
c. Schools?	☐	☐	✗	☐
d. Parks?	☐	☐	✗	☐
e. Other Public Facilities?	☐	☐	✗	☐

Discussion

- a. The Sacramento Fire Department (SFD) provides fire protection services to the entire City and some small areas just outside the City boundaries within the County limits. The SFD serves a population of over 738,000 in a 358-square-mile service area. SFD Station 11, located at 785 Florin Road, approximately one mile to the northwest, is the closest station to the project site. The SFD maintains a goal to have its first responding company, which provides for fire suppression and paramedic services, arrive within four minutes. Considering the proximity of the project site to Station 11, the SFD is reasonably assumed to be able to meet the four-minute response time goal.

As established by General Plan Policy PFS-1.15, the City of Sacramento requires new development projects to contribute fees for the provision of adequate fire and police protection services and facilities. The proposed project would be subject to all applicable development impact fees. Revenues generated through impact fees on new development would pay for any new fire facilities deemed necessary by the City, all of which would be required to be designed in compliance with applicable regulations and standards, and if necessary, undergo analysis of all potential environmental impacts under CEQA. Furthermore, the proposed project is consistent with the project site's Commercial Mixed-Use General Plan designation and has therefore been considered in the Master EIR analysis.

Considering the project site's proximity to Station 11 and the project's payment of applicable development impact fees, the proposed project would not result in the need for new or altered services related to fire protection. Therefore, the proposed project would have a **less-than-significant** impact related to the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.

- b. The Sacramento Police Department (SPD) provides police protection services within the City boundaries. The SPD uses a variety of data that includes Geographic Information System (GIS) data, call and crime frequency information, and available personnel to rebalance the deployment of resources on an annual basis to meet the changing demands of the City. According to the Master EIR, as buildout of the 2040 General Plan occurs, the SPD would need new facilities that would be required to accommodate growth and service demands. Although General Plan Policy PFS-1.14 establishes the City's commitment to ensuring the SPD achieves and maintains optimal response times for all call priority levels,

the Sacramento General Plan does not establish a specific response time standard for emergency calls for the SPD.

Due to the commercial nature of the proposed project, the proposed project would not increase City population and, therefore, would not be anticipated to create a substantial increase in demand for police services within the project area. In addition, Policy PFS-1.15 requires development projects to contribute fees for police facilities. The proposed project would be subject to all applicable development impact fees. Revenues generated through impact fees on new development would pay for any new police facilities deemed necessary by the City, all of which would be required to be designed in compliance with applicable regulations and standards, and if necessary, undergo analysis of all potential environmental impacts under CEQA. Furthermore, the proposed project is consistent with the project site's Commercial Mixed-Use General Plan designation and has therefore been considered in the Master EIR analysis. For the above-stated reasons, the project would have a **less-than-significant** impact related to the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts.

- c-e. The proposed project would not include any residential development and, thus, would not result in any direct population growth such that demand for schools, parks, or other public facilities would increase substantially. In addition, the project would be subject to payment of School Impact Mitigation Development Fees to fund local school services. Proposition 1A/SB 50 prohibits local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any "[...] legislative or adjudicative act...involving ...the planning, use, or development of real property" (Government Code 65996(b)). Satisfaction of the Proposition 1A/SB 50 statutory requirements by a developer is deemed to be "full and complete mitigation." Furthermore, the project would be subject to Sacramento Municipal Code Section 18.56.220, which requires the payment of park impact fees for non-residential developments, as well as Section 18.56, which requires the payment of transportation development impact funds for transportation infrastructure.

Because the project applicant would be required to pay appropriate development fees, and development of the project would not increase the demand for schools, parks, or other public facilities, the proposed project would have a **less-than-significant** impact related to the need for new or physically altered schools, parks, or other public facilities, the construction of which could cause significant environmental impacts.

XVI. RECREATION.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	✗	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	✗	☐

Discussion

- a,b. The proposed project would include the development of a self-storage facility on a site designated for employment use. While the proposed project would include one on-site manager's apartment, the employee to be hired and reside in the apartment would likely be an existing resident of Sacramento, and the proposed project would not result in additional residents within the City. As such, the proposed project would not result in population growth that could result in increased demand for existing recreational facilities or cause the construction or expansion of recreational facilities. Furthermore, the project would be subject to Section 18.56.220 of the Sacramento Municipal Code, which requires the payment of park impact fees for non-residential developments. Thus, a ***less-than-significant*** impact would occur.

XVII. TRANSPORTATION.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	✗	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	✗	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	✗	☐
d. Result in inadequate emergency access?	☐	☐	✗	☐

Discussion

- a. The law has changed with respect to how transportation-related impacts may be addressed under CEQA. Traditionally, lead agencies used level of service (LOS) to assess the significance of such impacts, with greater levels of congestion considered to be more significant than lesser levels. Enacted as part of SB 743 (2013), PRC Section 21099, subdivision (b)(1), directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses."

Pursuant to SB 743, the Natural Resources Agency promulgated CEQA Guidelines Section 15064.3 in late 2018. It became effective in early 2019. Subdivision (a) of that section provides that "[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."

Please refer to Question 'b' for a discussion of VMT.

Project Trip Generation

The proposed project is consistent with the land use designation for the site in the 2040 General Plan. As such, the Master EIR included an analysis of the increase in traffic associated with buildout of the project site. The proposed project would not increase traffic volumes from what has been anticipated in the 2040 General Plan. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system beyond what has been anticipated by the City pursuant to the Master EIR, and a less-than-significant impact would occur.

Pedestrian and Bicycle Facilities

Existing pedestrian facilities in the vicinity of the project site include continuous sidewalks located along both sides of Corporate Way. Continuous sidewalks are similarly located

along the streets throughout the community. Additionally, a Class II Bike Lane is located along Greenhaven Drive.²⁶ Bike lanes are not located along Corporate Way.

According to the City of Sacramento Bicycle Master Plan, proposed pedestrian or bicycle facilities are not located within the vicinity of the project site. Thus, the proposed project would not result in substantial modification or the removal of any existing or planned bicycle or pedestrian facilities or preclude the implementation of any proposed or existing off-street trails in the project vicinity. The project would include an accessible path of travel connecting the project site to the existing public sidewalk on Corporate Way. In addition, the proposed project is consistent with the project site's Commercial Mixed-Use General Plan designation and has therefore been considered generally in the Master EIR analysis. As such, the proposed project would not conflict with a program, plan, ordinance, or policy addressing roadway, bicycle, and pedestrian facilities beyond what has been determined in the Master EIR, and a less-than-significant impact would occur.

Transit Facilities and Service

Public transit service in the greater project vicinity is provided through Sacramento Regional Transit (SacRT) Route 106. Route 106 provides service from the Pocket Transit Center to the Sacramento Central Valley Station. The nearest Route 106 bus stop is located approximately 250 feet to the south of the project site on Greenhaven Drive. Route 106 operates Monday through Friday.

The proposed project would not result in substantial increases in transit demand, and any demand added to the transit system could be adequately accommodated by the existing/planned transit system. The proposed project would not result in substantial modification or the removal of any existing or planned transit facilities or preclude the implementation of any proposed or existing facilities in the project vicinity. In addition, the proposed project is consistent with the project site's Commercial Mixed-Use General Plan designation and has therefore been considered generally in the Master EIR analysis. As such, the proposed project would not conflict with a program, plan, ordinance, or policy addressing transit facilities beyond what has been determined in the Master EIR, and a less-than-significant impact would occur.

Conclusion

Based on the above information, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, bicycle, and pedestrian facilities, and a **less-than-significant** impact would occur.

- b. Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Pursuant to Section 15064.3, analysis of VMT attributable to a project is the most appropriate measure of transportation impacts. Pursuant to OPR, certain projects are presumed to have a less-than-significant effect on VMT due to project size, project location, or project type.²⁷

The Master EIR determined that implementation of the 2040 General Plan would result in a less than significant impact related to VMT. Specifically, implementation of the 2040 General Plan would result in a 17.2 percent reduction in passenger vehicle VMT per capita

²⁶ City of Sacramento. *City of Sacramento Bicycle Master Plan* [pg. 42]. August 2016.

²⁷ Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts In CEQA*. December 2018.

compared to the City baseline, which exceeds the 16.8 percent reduction established as the City's VMT impact threshold. Pursuant to Section 2.10.2 of the Master EIR, projects consistent with the General Plan land use designation and development intensities may not be required to evaluate VMT based on OPR guidance. Because the proposed project would be consistent with the site's 2040 General Plan land use designation of Commercial Mixed-Use, the proposed project would not be anticipated to result in VMT greater than what was previously anticipated for the project site and further analysis would not be required.

Based on the above, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and a ***less-than-significant*** impact would occur.

- c,d. The proposed project would not include any new sharp curves or dangerous intersections and would not be located in the vicinity of any such roadway features. The proposed project would include two driveways and seven surface parking spaces, with drive aisles large enough to accommodate heavy trucks. All proposed driveways would comply with applicable City design standards. In addition, the design of the on-site circulation system would not involve any features that would increase traffic hazards at the site. The project driveways would be free and clear of any obstructions to provide adequate sight distance, thereby ensuring that exiting vehicles can see pedestrians on the sidewalk and vehicles and bicycles traveling on Corporate Way. Any landscaping and signage would be located in such a way to ensure an unobstructed view for drivers exiting the site.

Several factors determine whether a project has sufficient access for emergency vehicles, including the following:

- Number of access points (both public and emergency access only);
- Width of access points; and
- Width of internal roadways.

Figure 4 of this IS/MND presents the proposed truck access and circulation for the project site using the truck turning-movement template for intermediate semi-trailers (WB-40), single-unit trucks (SU-30), and fire trucks. Based on the site plan configuration, adequate access would be provided for the aforementioned trucks to enter and exit the site at all proposed driveways. Emergency vehicles, WB-40, and SU-30 trucks would be able to adequately enter and exit the site driveways and maneuver around the drive aisles.

The proposed project would be required to comply with all building, fire, and safety codes and specific development plans would be subject to review and approval by the City's Public Works Department and the SFD. Required review by the aforementioned departments would ensure that the proposed circulation system for the project site would provide adequate emergency access. In addition, Sacramento City Code Section 12.20.030 requires that a Construction Traffic Control Plan be prepared and approved prior to the commencement of project construction, to the satisfaction of the City Traffic Engineer and subject to review by all affected agencies. All work performed during construction would be required to conform to the conditions and requirements of the approved plan. The plan would ensure that safe and efficient movement of traffic through the construction work zone(s) is maintained. At a minimum, the plan must include the following:

- Time and day of street closures;

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

Based on the above, the proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and would not result in inadequate emergency access. Therefore, a ***less-than-significant*** impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	☐	✗	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	✗	☐	☐

Discussion

- a,b. In compliance with AB 52 (PRC Section 21080.3.1), project notification letters were distributed to UAIC, Wilton Rancheria, Shingle Springs Band of Mi-Wok Indians, and Buena Vista Rancheria of Me-Wuk Indians on June 26, 2024. Requests to consult were not received within the required 30-day response period.

As discussed in Section V, Cultural Resources, of this Initial Study, the approximately 2.27-acre project site is currently undeveloped and consists entirely of ruderal grasses. However, the surrounding area has been highly disturbed and known cultural resources have not been identified. Given that the CHRIS search results indicated that the project site has a low potential for containing elements of the Sacramento River Tribal Cultural Landscape or other indigenous-period/ethnographic-period cultural resources, and the NAHC SLF produced negative results, surface tribal cultural resources are not anticipated to be found on-site during grading and construction activities. Nonetheless, due to the predominant historic theme of the region as a whole, which includes thousands of years of occupation by Native American groups prior to non-Native people settling in the region, the possibility exists that unknown resources could be encountered during grading and excavation activities associated with the proposed project. Thus, the project could have a potentially significant impact related to damage or destruction of prehistoric cultural resources, which could include tribal cultural resources.

Based on the above, known Tribal Cultural Resources do not exist within the proposed project site. Nevertheless, the possibility exists that construction of the proposed project could result in a substantial adverse change in the significance of a Tribal Cultural Resource if previously unknown resources are uncovered during grading or other ground-disturbing activities. Thus, a **potentially significant** impact to Tribal Cultural Resources could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

XVIII-1

In the Event that Tribal Cultural Resources are Discovered During Construction, Implement Procedures to Evaluate Tribal Cultural Resources and Implement Avoidance and Minimization Measures to Avoid Significant Impact.

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

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

If a tribal cultural resource is determined to be eligible for listing on the California Register of Historical Resources, the City shall avoid damaging effects to the resource in accordance with PRC Section 21084.3, if feasible. If the City determines that the project may cause a significant impact to a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less than significant may be reached:

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

XVIII-2

Implement Procedures in the Event of the Inadvertent Discovery of Native American Human Remains.

If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the following performance standards shall be met prior to implementing or continuing actions such as construction, which may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (HSC Section 7050.5[b]).

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

If the Coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the Coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant (MLD), in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in California PRC Section 5097.9 et seq.

XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	×	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	×	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	×	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	×	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	×	☐

Discussion

- a-c. Water supply, wastewater treatment, stormwater drainage, electric power, and telecommunications facilities necessary to serve the proposed project are described in the following sections.

Water Supply

To meet the City's water demand, the City uses surface water from the Sacramento and American rivers, and groundwater pumped from the North American and South American Subbasins. According to the City's 2020 UWMP, the City is projected to have sufficient water supply to meet the projected demand through 2045 even after multiple dry years.²⁸ According to the DOU's 2019 Consumer Confidence Report, the City's drinking water meets or exceeds all federal and State drinking water standards.²⁹ The proposed project would be subject to Water System Development and Installation Fees payable to the City's DOU.

Existing water mains in the immediate project vicinity include a 12-inch water main within Corporate Way. From four points of connection at the existing water main, two eight-inch and two 1.5-inch connections would extend into the project site. A proposed eight-inch fire water line would connect to the new domestic lines and would be installed within the new internal drive aisle around the building.

²⁸ City of Sacramento. *City of Sacramento 2020 Urban Water Management Plan*. June 2021.

²⁹ City of Sacramento Department of Utilities. *2021 Consumer Confidence Report*. Available at: <https://www.cityofsacramento.org/Utilities/Reports>. Accessed August 2023.

The 2040 General Plan designates the site as Commercial Mixed-Use. The proposed project is consistent with the land use designation and would not generate an increase in water demand beyond what has already been anticipated in the Master EIR. Additionally, mini storage is generally a low water user, and therefore, the self-storage facility would not generate significant water demand. As such, adequate capacity is expected to be available to serve the proposed project's water demands. Nonetheless, pursuant to Section 13.2.3 of the City of Sacramento Design and Procedure Manual, a water study would be prepared for the proposed project by a licensed engineer in accordance with the City's Water Study Manual, which would demonstrate that the proposed water system is capable of meeting the needs of the proposed project, while meeting design criteria presented therein.

Based on the above, the proposed project would not require or result in the relocation or construction of new or expanded off-site water facilities, the construction or relocation of which could cause significant environmental effects, and sufficient water supplies would be available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Wastewater Conveyance and Treatment

Wastewater collection and treatment services for the proposed project would be provided by SacSewer. Wastewater generated from the project area is collected in the CSS through a series of sewer pipes and flows into the SacSewer interceptor system, where the sewage is conveyed to the SRWWTP, located near Elk Grove. The SRWWTP is owned and operated by SacSewer and provides sewage treatment for the entire City. The proposed project would be subject to Wastewater System Development Fees payable to the City's DOU.

The proposed project would connect to an existing six-inch sewer line and an existing public sewer manhole located within Corporate Way by way of a new six-inch sewer line (see Figure 6).

The proposed project's consistency with the General Plan land use designation would ensure that the demand for wastewater service would not exceed the amount anticipated for buildout of the Planning Area evaluated in the Master EIR. In addition, buildout capacity of the entire SacSewer service area was anticipated in the 2019 Sewer System Management Plan (SSMP).³⁰ Therefore, SacSewer has anticipated the need for wastewater services in the project area and requires development impact fees to support buildout demand of their service area (including the project site). Additionally, SacSewer would require payment of sewer impact fees. All applicable impact fees would be required to be paid prior to issuance of a building permit.

Given the required payment of applicable impact fees, the SRWWTP would be able to provide sufficient wastewater services and conveyance to serve full buildout of the City, including the project site. Therefore, adequate capacity exists to serve the project site's demands.

Stormwater Drainage

The project site is currently undeveloped. Completion of the proposed project would increase the amount of impervious surfaces on the site. As discussed in further detail in

³⁰ Sacramento Regional County Sanitation District. *Sewer System Management Plan*. February 4, 2019.

Section X, Hydrology and Water Quality, of this Initial Study, the proposed project would include on-site stormwater detention facilities sized to exceed the minimum volume requirement necessary to adequately manage all runoff from the proposed impervious surfaces. Thus, the project would not require new or expanded off-site stormwater infrastructure. Because the proposed detention facilities would be designed with adequate capacity to capture and treat runoff from proposed impervious surfaces, the proposed project would not generate runoff in excess of the City's existing stormwater system's capacity.

Electric Power and Telecommunications

The proposed project would include new connections to existing electric power and telecommunications facilities located in the project vicinity. Substantial expansion of off-site utilities would not be required to serve the proposed development, and associated environmental effects would not occur.

Conclusion

Based on the above, the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. In addition, sufficient water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and adequate wastewater treatment capacity is available to serve the project's projected demand in addition to the provider's existing commitments. Thus, a **less-than-significant** impact would occur.

- d,e. Solid waste generated by commercial uses in the area is collected by private haulers and currently disposed of at the Kiefer Landfill. Kiefer Landfill, located at 12701 Kiefer Boulevard in Sloughhouse, California, is the primary location for the disposal of waste by the City. According to the Master EIR, the landfill is permitted to accept up to 10,815 tons per day and the current peak and average daily disposal is substantially lower than the permitted amount. The landfill is anticipated to be capable of adequately serving the area, including the anticipated population growth, until the year 2065. The Master EIR concluded that adequate capacity at local landfills exists for full buildout of the General Plan. The proposed project is consistent with the General Plan land use designation of the project site, and the associated increase in solid waste disposal needs associated with development of the site was generally considered in the Master EIR analysis. The proposed project would not generate an increase in solid waste from what has been anticipated in the Master EIR. As such, adequate capacity would be expected to be available to serve the proposed project's solid waste disposal needs. Therefore, a **less-than-significant** impact related to solid waste would occur as a result of the proposed project.

XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	✗	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	✗	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	✗	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	✗	☐

Discussion

- a-d. According to the Master EIR, the City is not located within a wildland urban interface (WUI) area. Additionally, the Master EIR identifies areas along the American and Sacramento rivers as fairly susceptible to urban wildfires. The project site is not located within the vicinity of such areas. According to the CAL FIRE Fire and Resource Assessment Program, the project site is not located within a Very High Fire Hazard Severity Zone nor a State Responsibility Area. The nearest Very High FHSZ is located approximately 25 miles to the west.³¹ The proposed project would be required to comply with all applicable requirements of the California Fire Code (CFC), as adopted by Chapter 15.36 of the City's Municipal Code, including installation of fire sprinkler systems. In addition, the CBSC includes requirements related to fire hazards for new buildings. Such features would help to reduce the spread of fire.

As noted in Section IX, implementation of the proposed project would not interfere with potential evacuation or response routes used by emergency response teams. The project would not conflict with the Sacramento County LHMP.³² In addition, the proposed project would not include any development on, or at the base of, a substantial slope. Thus, implementation of the proposed project would not exacerbate any existing conditions or hazards related to downslope flooding or landslides, slope instability, or drainage changes. Therefore, the project area does not include any existing features that would substantially increase fire risk for future residents.

Given that the project site is located within a developed urban area and is situated adjacent to existing roads, water lines, and other utilities, the proposed project would not require the development of additional infrastructure, and, thus, would not result in substantial fire risks related to installation or maintenance of such infrastructure. Therefore, the proposed project would not be subject to substantial risks related to wildfires, and a **less-than-significant** impact would occur.

³¹ California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Available at: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed August 2024.

³² Sacramento County. *Local Hazard Mitigation Plan Update*. September 2021.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less-Than- Significant with Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially 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. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

- a. As discussed in Section IV, Biological Resources, of this Initial Study, implementation of the proposed project would have the potential to result in adverse effects to special-status wildlife species. In addition, while unlikely, the project could result in impacts related to eliminating important examples of major periods of California history or prehistory associated with undiscovered archeological and/or paleontological resources during project construction. However, the proposed project would be required to comply with applicable City of Sacramento 2040 General Plan and Municipal Code policies related to biological and cultural resources, and this Initial Study includes mitigation measures that would reduce any related potential impacts to less-than-significant levels. With implementation of the mitigation measures required by this Initial Study, as well as compliance with General Plan policies and all applicable sections of the Municipal Code, development of the proposed project would reduce any potential impacts associated with the following: 1) degradation of the quality of the environment; 2) substantial reduction of or impact to the habitat of fish or wildlife species; 3) causing fish or wildlife populations to drop below self-sustaining levels; 4) threatening to eliminate a plant or animal community; 5) reduction of the number or restrict the range of a rare or endangered plant or animal; or 6) elimination of important examples of the major periods of California history or prehistory. Therefore, with implementation of the mitigation measures required herein, a **less-than-significant** impact would occur.
- b. The proposed project, in conjunction with other development within the City of Sacramento, could incrementally contribute to cumulative impacts in the area. However, as demonstrated in this Initial Study, all potential environmental impacts that could occur as a result of project implementation would be reduced to a less-than-significant level through compliance with the mitigation measures included in this Initial Study, as well as applicable General Plan policies, Municipal Code standards, and other applicable local and State regulations. Therefore, when viewed in conjunction with other closely related past, present, or reasonably foreseeable future projects, development of the proposed project would not result in a cumulatively considerable contribution to cumulative impacts

in the City of Sacramento, and the project's incremental contribution to any cumulative impacts would be ***less than significant***.

- c. As described in this Initial Study, the proposed project would comply with all applicable General Plan policies, Municipal Code standards, other applicable local and State regulations, and mitigation measures included herein. The foregoing provisions have been established to ensure substantial adverse effects from proposed development projects, including those impacting human health, are prevented and/or reduced to a less-than-significant level. For example, as discussed in Section III, Air Quality, Section IX, Hazards and Hazardous Materials, and Section XIII, Noise, of this Initial Study, the proposed project would not cause substantial effects to human beings, including effects related to exposure to air pollutants, hazardous materials, and noise. Therefore, the proposed project's impact would be ***less than significant***.