



Mitigated Negative Declaration

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

1. Control Number: PLNP2024-00062

2. Title and Short Description of Project: 4600 Auburn Boulevard Rezone

The applicant is proposing to develop three parcels in unincorporated Sacramento County in two phases. Phase One of the project includes developing the southern two parcels (APNs: 240-0062-028-0000 and 240-0062-091-0000), which total 1.3 acres, with a new self-storage facility. The two parcels are zoned General Commercial (GC), which permits self-storage development and uses by-right. This component of the project is subject to the County's non-discretionary design review, which is in concurrent review (DRCP2025-00005). A new driveway across the parcel to the north (APN 240-0062-034-0000) will provide access to the storage facility from Auburn Boulevard; this driveway will be a part of proposed Phase One. Phase Two includes developing the 3.5-acre northern parcel (APN 240-0062-034-0000) as a commercial center offering retail or office units for lease. The design footprint includes the construction of three buildings. This parcel is currently zoned RD-30 (high density residential) and commercial development is not compatible in the RD-30 zoning district; therefore, Phase Two includes the following entitlements:

- A General Plan Amendment from Low Density Residential (LDR) land use designation to proposed Commercial and Office (COMM/OFF) land use designation;
- A Community Plan Amendment from Residential 30 (RD-30) to proposed General Commercial (GC); and
- A Rezone from Residential 30 (RD-30) zoning designation to proposed General Commercial (GC) zoning designation.

Phase One is anticipated to begin construction in 2026 and will not require a compacted construction schedule. The schedule for completion of Phase Two is unknown at this time; however, for purposes of analysis, Phase Two is anticipated to begin in 2027 and will not require a compacted construction schedule. The analysis contained herein is based on completion of both phases.

3. Assessor's Parcel Number(s): 240-0062-034-0000, 240-0062-028-0000 & 240-0062-091-0000

4. Location of Project: The project is located at 4600 Auburn Boulevard in the Carmichael/Old Foothill Farms community of Sacramento County. The project is approximately 200 feet north of Pasadena Avenue and approximately 1080 feet south of Myrtle Avenue.

5. Project Applicant: Tower Development Corp; Attn: Carl Benvenuti
9940 Business Park Drive #135
Sacramento, CA 95827

6. Said project will not have a significant effect on the environment for the following reasons:

- a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

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

**Julie
Newton**

Digitally signed by Julie Newton
DN: cn=Julie Newton, o=Sacramento
County, ou,
email=newtonju@sacounty.net,
c=US
Date: 2025.05.19 12:14:57 -07'00'

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

TABLE OF CONTENTS

Project Information..... 3

Project Description..... 3

Surrounding Land Uses and Setting..... 4

Other Public Agencies Whose Approval is Required 5

Environmental Checklist..... 9

 Environmental Factors Potentially Affected 9

 I. Aesthetics10

 II. Agriculture and Forestry Resources13

 III. Airports.....15

 IV. Air Quality17

 V. Biological Resources29

 VI. Cultural Resources39

 VII. Energy43

 VIII. Geology and Soils.....45

 IX. Greenhouse Gas Emissions50

 X. Hazards and Hazardous Materials55

 XI. Hydrology and Water Quality57

 XII. Land Use and Planning.....63

 XIII. Mineral Resources67

 XIV. Noise68

 XV. Population and Housing.....72

 XVI. Public Services73

 XVII. Recreation75

 XVIII. Transportation76

 XIX. Tribal Cultural Resources79

 XX. Utilities and Service Systems.....82

 XXI. Wildfire85

 XXII. Mandatory Findings of Significance87

Environmental Mitigation Measures89

 Mitigation Measure Compliance89

List of Preparers.....89

References/Citations.....90

LIST OF PLATES

Plate IS-1: Project Location..... 6

Plate IS-2: Project Phasing 7

Plate IS-3: Project Site Plan 8

Plate IS-4: Tree Location and Removals.....31

Plate IS-5: Existing and Proposed General Plan Designation.....65

Plate IS-6: Existing and Proposed Rezone.....66

LIST OF TABLES

Table IS-1: SMAQMD Significance Thresholds19
Table IS-2: PM_{2.5} Health Risk Estimates24
Table IS-3: Ozone Health Risk Estimates25
Table IS-4: Project Area Soil Descriptions.....47
Table IS-5: SMAQMD Thresholds of Significance for Greenhouse Gases51

APPENDICES

Appendix A: Arborist Report and Tree Inventory Summary, Acorn Arboricultural Services, Inc. October 30, 2023 and update July 8, 2024

Appendix B: Tree Impact Summary

Due to the length, Appendix A is available to view at Sacramento County Planning and Environmental Review, 827 7th Street Room 225, Sacramento, CA 95814 during normal business hours, or online at <http://planningdocuments.saccounty.net>

The direct link is:

<https://planningdocuments.saccounty.net/ViewProjectDetails.aspx?ControlNum=PLNP2024-00062>

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

PROJECT TITLE: 4600 Auburn Boulevard Rezone

CONTROL NUMBER: PLNP2024-00062 and DRCP2025-00005

LEAD AGENCY: County of Sacramento
827 7th Street, Room 225
Sacramento, CA 95814

PROJECT SPONSOR: Tower Development Corp; Attn: Carl Benvenuti
9940 Business Park Drive #135
Sacramento, CA 95827

LOCATION: The project is located at 4600 Auburn Boulevard in the Carmichael/Old Foothill Farms community of Sacramento County. The project is approximately 200 feet north of Pasadena Avenue and approximately 1080 feet south of Myrtle Avenue (Plate IS-1)

ASSESSOR'S PARCEL NUMBER: Phase One: 240-0062-028-0000 & 240-0062-091-0000
Phase Two: 240-0062-034-0000

GENERAL PLAN DESIGNATION: Phase One: Commercial and Office (COMM/OFF)
Phase Two: Low Density Residential (LDR)

ZONING: Phase One: General Commercial (GC)
Phase Two: Residential 30 (RD-30)

PROJECT DESCRIPTION

The applicant is proposing to develop three parcels in unincorporated Sacramento County in two phases (Plate IS-2 and Plate IS-3).

Phase One of the project includes developing the two southern parcels (APNs: 240-0062-028-0000 and 240-0062-091-0000), which total 1.3 acres, with a new self-storage facility, consisting of two single-story buildings totaling 16,600 square feet. The two parcels are zoned General Commercial (GC), which permits self-storage development and uses by-right. The operating hours are anticipated to be from 6am to 9pm every day. Because the two parcels are landlocked, a new driveway connection to Auburn Boulevard is proposed across the northern parcel (APN 240-0062-034-0000). Prior to the issuance of building permits, the development proposal is subject to non-discretionary design review (DRCP2025-00005) approval. However, because the driveway will be constructed on a separate parcel (APN: 240-0062-034-0000), and

the driveway will be a component of both proposed Phases. Both Phases are included in this review. Implementation of Phase One of the project requires the following entitlements:

1. A **Major Non-Discretionary Design Review** to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines) for a self-storage facility in the General Commercial (GC) zoning district.
2. **Grading permit.** As part of the improvement plan grading will occur to provide access from Auburn Boulevard via parcel (240-0062-034-0000) to Phase One parcels (240-0062-028-0000 and 240-0062-091-0000).

Construction of Phase One is anticipated to be completed in 2026 and would not require a compacted construction schedule.

Phase Two would occur on the northern 3.57-acre parcel, APN:240-0062-034-0000 (Plate IS-1) and consists of the development of a commercial center offering retail or office units for lease, and has a tentative design footprint of three buildings and associated parking lot. These buildings would be served by the driveway constructed in Phase One (Plate IS-3). As the specifics of the commercial center have not been finalized it is believed that most businesses would operate 7am to 6pm Monday through Saturday, but some businesses may have different hours. Implementation of Phase Two of the project requires the following entitlements:

1. A **General Plan Amendment** of approximately 3.57 acres from the existing Low Density Residential (LDR) land use designation to the proposed Commercial and Office (COMM/OFF) land use designation.
2. A **Community Plan Amendment** of approximately 3.57 acres from the existing Residential 30 Dwelling Units Per Acre (RD-30) land use designation to the proposed General commercial (GC) land use designation.
3. A **Rezone** of approximately 3.57 acres from the existing Residential 30 Dwelling Units Per Acre (RD-30) zoning district to the proposed General commercial (GC) zoning district.

The details, or specifics, of the commercial center have not been determined. Therefore, the schedule for completion of Phase Two is not known; however, for purposes of analysis Phase Two is anticipated to begin in 2027 and would not require a compacted construction schedule. In addition, analysis of the project is based on the planned completion of both phases.

SURROUNDING LAND USES AND SETTING

The parcels to the south, west and north of the project site (i.e., the parcels along Auburn Boulevard) have a General Plan designation of Commercial and Office, with zoning designations of General Commercial. The parcels to the east of the project site have a General Plan designation of Low Density Residential, with a zoning designation of RD-10 (10 Dwelling Units Per Acre). The Phase One project site has never been developed, and the Phase Two portion is a former mobile home park, as evidenced with remnants of the internal circulation and home pads, and which appears to have ceased operation around the early 2000s. Viewing past aerial photos of the project site indicate that a number of trees have been removed over the

years, however, there are still a number of native oaks and some non-native landscape trees. The former mobile home site is now dominated by weedy plants and grasses.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

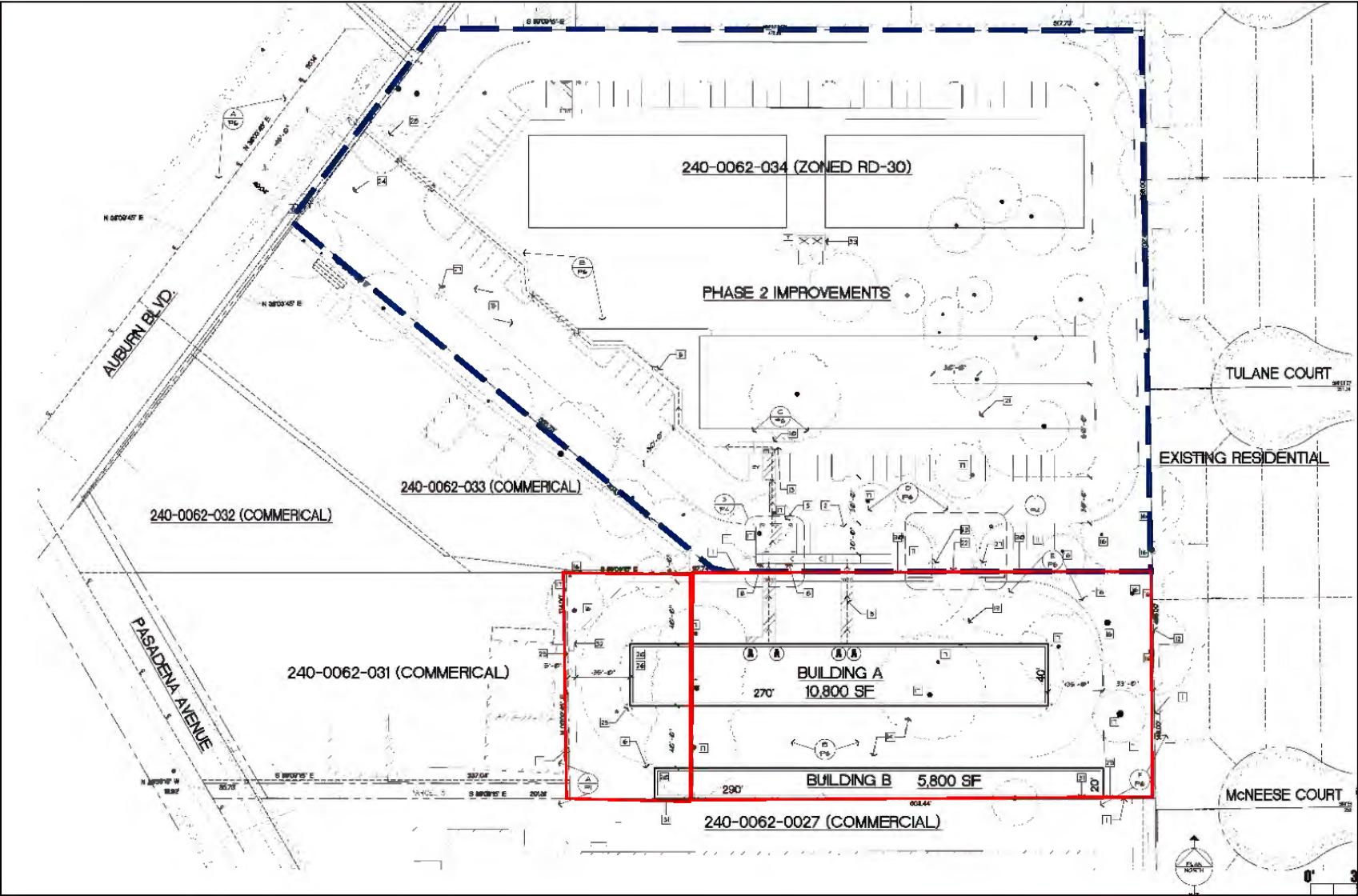
SMUD

Plate IS-1: Project Location



GR-19457-3/26/2025\pwwd2\user\projects\2024\PLNP\PLNP2024-00062 GFB-CZB 4600 Auburn Boulevard Rezone\Graphics\GIS\PLNP24_00062_MAPS_0424.aprx

Plate IS-3: Project Site Plan



ENVIRONMENTAL CHECKLIST

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Airports |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emission |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire |

I. AESTHETICS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views ¹ of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Notes: ¹ Public views are those that are experienced from a publicly accessible vantage point.				

ENVIRONMENTAL SETTING

The site is open land that was previously a mobile home park located along Auburn Boulevard. To the north, west and south are various commercial uses while to the east are residential units. Auburn Boulevard and the surrounding roadways are not designated as scenic highways.

REGULATORY SETTING

The only regulatory elements present in the County General Plan are associated with the preservation of scenic corridors within the General Plan’s Circulation Element. The project is not located within either a State recognized, or County adopted scenic corridor. The project is within the Carmicheal Old Foothill Farms Community Plan which does not include any formal regulation of aesthetics. The Sacramento County Zoning Code provides the groundwork for the use of the Countywide Design Guidelines (Design Guidelines) by requiring design reviews for proposed projects. The Design Guidelines were developed to provide consistent design principles to implement the County General Plan and aim to ensure that new development compliments the character of the surrounding area. Design Guidelines have been established for residential, commercial and industrial developments. For the Phase One self-storage facility, some of the applicable guidelines include:

- Self-storage facilities are encouraged to be constructed to appear as commercial or industrial buildings that house self-storage units within, when feasible.
- Buildings facing the public right-of-way, including manager units, lobbies, and/ or front office functions should be articulated, to reflect the character of the neighborhood.

- Large unarticulated, building elevations or walls, visible from the street or public right-of-way, should be avoided. Rather, the facades of self-storage facilities should be articulated through the use of colors that are compatible with the surrounding neighborhood; material changes; changes in building heights; and building design details, including horizontal and vertical building reliefs and articulation of building entries, windows, and roofs.
- Building elevations or walls or fences adjacent to a street or public right-of-way, as applicable, should be articulated and/or screened with landscaping. Use of public art is also encouraged along outer security walls or fences, as applicable.
- The street frontage of self storage facilities shall be landscaped in accordance with the landscape requirements of the property's zoning district.

Although Phase Two of the project is only conceptual and has not prepared specific building designs, prior to building permit submittal to construct Phase Two, the building designs would be subject to design review in accordance with Section 5.0 of the Design Guidelines (Office, Business Park, Institutional and Industrial Development Design Guidelines).

IMPACT DISCUSSION

a. Would the project have a substantial adverse effect on a scenic vista?

Commercial and residential urban development surrounds the project site. The existing viewshed along Auburn Boulevard in the project area consists of general commercial development, mostly of retail and general services. The area surrounding the project site is relatively flat and does not contain varying topography that could create visual vistas. Furthermore, the project site is not located within a scenic vista, or along a state designated scenic highway or locally designated scenic road. Impacts would be ***less than significant***.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no designated scenic highways in the vicinity of the project. ***No Impact.***

c. Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is within an urbanized portion of unincorporated Sacramento County. The self-storage facility of Phase One is permitted by-right in the General Commercial zoning district, subject to non-discretionary design review approval prior to issuance of building permits. Design review ensures that development is consistent with the Design Guidelines. Phase Two includes the development of a commercial center with three buildings less than four stories in height on a parcel currently zoned residential. As such, the project proposal includes entitlement requests to amend the General Plan designation from Low Density Residential to Commercial and Office and a rezone from residential to general commercial. Once the land use designation is changed from residential to commercial, the proposed commercial center will not conflict with applicable zoning. Design review approval for

consistency with the Design Guidelines will further ensure compatible development. Impacts would be **less than significant**.

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

For both project phases, lighting would consist of interior lights and outdoor lights for safety and security. Outdoor lighting requirements are set forth in the County Zoning Code and Design Guidelines. The Zoning Code standards for parking lot lighting require that lighting be shielded or recessed to reduce light trespass to adjoining properties and the Design Guidelines include requirements for exterior materials that would not promote glare. Compliance with the Zoning Code and the Design Guidelines will reduce the potential for substantial light or glare to neighboring properties and impacts would be **less than significant**.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

II. AGRICULTURE AND FORESTRY RESOURCES

<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p>				
	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Introduce incompatible uses in the vicinity of existing agricultural uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The northern portion of the project site was previously developed as a former mobile home park; however, the entire site is now vacant and consists of open land with grass, weedy plants and trees. Based on review of the 2020 Important Farmland Map for Sacramento County from the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP), the project area is designated as Urban and Built-Up Land (California Department of Conservation, 2025). Urban and Built-Up Land is used for residential, industrial, commercial, institutional, and other developed purposes.

IMPACT DISCUSSION

- a. *Would the project 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?*

The project site is classified as Urban and Built-Up land and there is no farmland within the project area or vicinity. The implementation of the project will not convert any farmland. **No Impact.**

- b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The project site is not zoned for agricultural use. Additionally, there are no active Williamson Act contracts for the project parcels. Therefore, implementation of the project would not conflict with existing zoning for agriculture. **No Impact.**

- c. *Would the project introduce incompatible uses in the vicinity of existing agricultural uses?*

The surrounding area is either commercial or residential uses. **No Impact.**

- d. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?*

The project site is not zoned as forest land. **No Impact.**

- e. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

There are no forest lands on the project site. **No Impact.**

- f. *Would the project 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?*

There are no agricultural or forest lands in the vicinity of the project site and the project area is surrounded by commercial and residential uses. **No Impact.**

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

III. AIRPORTS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project is located within the Carmichael/Old Foothill Farms community of Sacramento County. The nearest airport is McClellan Air Park located approximately two miles west of the project site. The project is outside both the airport safety zone and 60dB noise contours; however, it is within the Airport Planning Policy Area for McClellan Air Park.

REGULATORY SETTING

The Sacramento County Board of Supervisor’s adopted resolution 2006-1379 regarding noise at County airports on April 19, 2006, which were subsequently incorporated into the Sacramento County 2030 General Plan Noise Element (adopted in 2011) as Policies NO-3 and NO-4. Those policies read:

- NO-3. New residential development within the 60 CNEL noise contours adopted by the County for planning purposes at any airport or Helipad within Sacramento County shall be prohibited. This policy is not applicable to Executive Airport.
- NO-4. New residential development within adopted Airport Policy Area boundaries, but outside the 60 CNEL, shall be subject to the following conditions:
 - a. Provide minimum noise insulation to 45 dB CNEL within new residential dwellings, including detached single-family dwellings, with windows closed in any habitable room Notification in the Public Report prepared by the California Department of Real Estate disclosing the fact to prospective buyers that the parcel is located within an Airport Policy Area.
 - b. Notification in the Public Report prepared by the California Department of Real Estate disclosing the fact to prospective buyers that the parcel is located within an Airport Policy Area.

- c. An Avigation Easement prepared by the Sacramento County Counsel's Office granted to the County of Sacramento, recorded with the Sacramento County Recorder, and filed with Department of Airports. Such Avigation Easement shall acknowledge the property location within an Airport Planning Policy Area and shall grant the right of flight and unobstructed passage of all aircraft into and out of the subject Airport.

IMPACT DISCUSSION

- a. *Would the project result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?*

The project is within McClellan Air Park's Airport Policy Area; however, it is outside of the Air Park's safety zone. Therefore, the project would not result in a safety hazard as the project is consistent with the airport policy. **No Impact.**

- b. *Would the project expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?*

The project site is outside of the 60dB noise contour for McClellan Air Park. Additionally, since the project does not include residential development, General Plan policies NO-3 and NO-4 are not applicable. Therefore, construction of the project would not expose people residing or working in the project area to aircraft noise in excess of applicable standards. **No Impact.**

- c. *Would the project result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?*

The project site is not within the McClellan Air Park's overflight zone or airport safety zone. Therefore, construction of the project would not result in substantial adverse effects on navigable airspace. **No Impact.**

- d. *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

The implementation of the project would not increase air traffic levels or change the location of air traffic. Therefore, air traffic patterns would not be changed. **No Impact.**

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

IV. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located within the southern portion of the Sacramento Valley Air Basin (SVAB) in Sacramento County. The climate of the SVAB is characterized by hot, dry summers and cool, rainy winters. Average annual rainfall is about 20 inches with snowfall being very rare. Typically, winds transport air pollutants northward out of the SVAB; however, during approximately half of the time from July to September, the wind pattern shifts southward, blowing air pollutants back into the SVAB and exacerbating the concentration of air pollutant emissions in the air basin. In addition, between winter storms, high pressure and light winds contribute to low-level temperature inversions and stable atmospheric conditions, resulting in the concentration of air pollutants.

The project site is currently vacant. There are commercial uses to the north, west and south of the project site which are not considered sensitive receptors; however, to the east of the project site is a residential development which would be considered sensitive receptors for any air quality impacts.

REGULATORY SETTING

FEDERAL, STATE AND LOCAL AGENCIES

Air quality in Sacramento County is regulated by several agencies, which include the U.S. Environmental Protection Agency (EPA), California Air Resources Board (CARB), and Sacramento Metropolitan Air Quality Management District (SMAQMD). Each of these agencies develops rules and/or regulations to attain the goals or directives imposed upon them through legislation. In general, air quality is evaluated based upon standards developed by federal and state agencies. Although EPA regulations may not be superseded, both state and local regulations may be more stringent. Mobile sources of air pollutants are largely controlled by

federal and state agencies, while local air pollution control districts (APCD) or air quality management districts (AQMD) regulate stationary sources.

CRITERIA AIR POLLUTANTS

Individual air pollutants at certain concentrations may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation. Six air pollutants have been identified by the EPA and CARB as being of concern both on a nationwide and statewide level: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead, and particulate matter (PM). Particulate matter is subdivided into two classes based on particle size—PM equal to or less than 10 micrometers in diameter (PM₁₀) and PM equal to or less than 2.5 micrometers in diameter (PM_{2.5}). Because the air quality standards for these air pollutants are regulated using human and environment health-based criteria, they are commonly referred to as “criteria air pollutants (CAP).”

EPA and CARB have established health-based air quality standards for criteria air pollutants. These standards are referred to as the national ambient air quality standards (NAAQS) and the California ambient air quality standards (CAAQS), respectively. The NAAQS and CAAQS were established to protect the public with a margin of safety from adverse health impacts caused by exposure to air pollution. Both EPA and CARB designate areas of California as “attainment,” “nonattainment,” “maintenance,” or “unclassified” for the various pollutant standards according to the federal Clean Air Act (CAA) and the California CAA (CCAA), respectively.

The Federal and California Clean Air Acts require Air Quality Plans that consist of attainment plans and maintenance plans. An “attainment” designation signifies that pollutant concentrations do not exceed the established standard. A “nonattainment” designation indicates that a pollutant concentration has exceeded the established standard. Attainment plans must show how the region will attain an air pollutant standard by a certain date, and maintenance plans must demonstrate how the region will continue to maintain compliance with a standard. The most recent State Implementation Plan was adopted in September 2023, for Ozone.¹

Within the SVAB, SMAQMD is responsible for ensuring that emission standards are not violated. With respect to regional air quality, Sacramento County does not attain the following state and federal ambient air quality standards²:

- Ozone
 - Nonattainment for State Ozone 1-hour and 8-hour Standards
 - Nonattainment, Classification Severe 15 for Federal Ozone 8-hour Standard (2008 NAAQS)
- Particulate Matter, 10-Microns (PM₁₀)
 - Nonattainment for State 24-hour Standard and Annual arithmetic mean
- Particulate Matter, 2.5 Microns (PM_{2.5})
 - Nonattainment for Federal 24-hour Standard

¹ <https://www.airquality.org/businesses/air-quality-plans>, retrieved 1/13/2025

² <https://www.airquality.org/Air-Quality-Health/Air-Quality-Pollutants-and-Standards#f05>, retrieved 5/5/2025

Sacramento County is designated as attainment or unclassified for all other criteria pollutant NAAQS and CAAQS (Sacramento Metropolitan AQMD, 2024). Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation.

SACRAMENTO METROPOLITAN AIR QUALITY RULES AND REGULATIONS

The SMAQMD was created by state law to enforce local, state, and federal air pollution regulations within the SVAB. The SMAQMD's overall mission is to achieve clean air goals by leading the Sacramento region in protecting public health and the environment through effective programs, community involvement, and public education. The SMAQMD interacts with local, state, and federal government agencies, the business community, environmental groups, and private citizens to achieve these goals.

SMAQMD regulates air quality in Sacramento County through its permit authority over stationary sources of emissions, through its vehicle and fuels management program, and through planning and review activities. All projects are subject to SMAQMD Rules and Regulations in effect at the time of construction. A full list of the District's Rules and Regulations can be found online at their Rules & Regulations webpage at <https://www.airquality.org/Businesses/Rules-Regulations#09>. Examples of several SMAQMD Rules applicable to the proposed project include Rule 201 – General Permit Requirements, Rule 403 – Fugitive Dust and Rule 422 – Architectural Coatings.

Because the SVAB is in nonattainment for ozone, PM₁₀, and PM_{2.5}, the SMAQMD requires that all projects implement the District's Basic Construction Emission Control Practices (also known as Best Management Practices- BMPs). Compliance and implementation of the BMPs allow for proposed projects to utilize the District's Significance Thresholds for construction and operational emissions, as shown in Table IS-1. Otherwise, without the BMPs, any emission above zero pounds per day would be considered significant and inconsistent with SMAQMDs air quality plans.

Table IS-1: SMAQMD Significance Thresholds

	ROG ¹ (lbs/day)	NO _x (lbs/day)	CO (µg/m ³)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Construction (short-term)	None	85	CAAQS ²	80 ^{3*}	82 ^{3*}
Operational (long-term)	65	65	CAAQS	80 ^{3*}	82 ^{3*}
1. Reactive Organic Gas 2. California Ambient Air Quality Standards 3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.					

- 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, and parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- Minimize idling time by either shutting equipment off when not in use or reducing time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

The following list from Chapter 4 of the SMAQMD "Guide to Air Quality Assessment in Sacramento County" (December 2009, as amended, hereinafter called the SMAQMD Guide) identifies the BMPs for operational PM emissions for land use development projects:

1. Compliance with District rules that control operational PM and NOx emissions. Reference rules regarding wood burning devices, boilers, water heaters, generators and other PM control rules that may apply to equipment to be located at the project. Current rules can be found on the District's website: <http://www.airquality.org/Businesses/Rules-Regulations>
2. Compliance with mandatory measures in the California Building Energy Efficiency Standards (Title 24, Part 6) that pertain to efficient use of natural gas for space and water heating and other uses at a residential or non-residential land use. The current standards can be found on the California Energy Commissions website: <http://www.energy.ca.gov/title24/>
3. Compliance with mandatory measures in the California Green Building Code (Title 24, Part 11). The California Building Standards Commission provides helpful checklists showing the required and voluntary measures for residential and non-residential projects on its website: <http://www.bsc.ca.gov/Home/CALGreen.aspx>.

Current mandatory measures related to operational PM include requirements for bicycle parking, parking for fuel efficient vehicles, electric vehicle charging, and fireplaces for non-residential projects. Residential project measures include requirements for electric vehicle charging and fireplaces.

4. Compliance with anti-idling regulations for diesel powered commercial motor vehicles (greater than 10,000 gross vehicular weight rating). This BMP focuses on non-residential land use projects (retail and industrial) that would attract these vehicles. The current requirements include limiting idling time to 5 minutes and installing technologies on the vehicles that support anti-idling. Information can be found on the California Air Resources Board's website: <http://www.arb.ca.gov/msprog/truckidling/truck-idling.htm>.

Additionally, the California Air Resources Board adopted a regulation that applies to transport refrigeration units (TRUs) that are found on many delivery trucks carrying food.

Information on the TRU regulation can be found on the California Air Resources Board's website: <http://www.arb.ca.gov/diesel/tru/tru.htm>.

Since retail and industrial land use projects may not have control over the anti-idling technologies installed on commercial vehicles coming to the project, the BMP is to provide notice of the anti-idling regulations at the delivery/loading dock and to neighbors. The notice to the neighbors should also include who at the retail or industrial project can be contacted to file a complaint regarding idling and the California Air Resources Vehicle Complaint Hotline 1-800-363-7664.

CRITERIA POLLUTANT HEALTH RISKS AND TOXIC AIR CONTAMINANTS

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

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

Toxic air contaminants (TAC) are a set of airborne pollutants that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are also referred to as toxic air pollutants or hazardous air pollutants. The health effects associated with TACs are quite diverse and are generally assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage; or short-term acute effects, such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

The greatest potential TAC emissions associated with the proposed project would be related to diesel particulate matter (DPM) emissions from off-road and on-road diesel-fueled equipment used for construction activities. DPM differs from other TACs because it is not a single substance, but a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, type of lubricating oil, and presence or absence of an emission control system.

IMPACT DISCUSSION

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Air quality plans describe air pollution control strategies to be implemented to bring an area that does not attain the NAAQS or CAAQS into compliance with those standards, or to maintain existing compliance with those standards, pursuant to the requirements of the CAA and CCAA.

In accordance with SMAQMD's CEQA Guide, (SMAQMD 2020a, p. 4-6):

By exceeding the District's mass emission thresholds for operational emissions of ROG, NOX, PM10, or PM2.5, the project would be considered to conflict with or obstruct implementation of the District's air quality planning efforts.

As documented in the SMAQMD CEQA Guide, the recommended construction and operational mass emissions thresholds for ozone precursors correlate to the NOX and ROG reductions from heavy-duty vehicles and land use project emission reduction requirements committed to in the Ozone Attainment Plan; therefore, projects whose emissions would be less than the recommended thresholds of significance for criteria air pollutants would not conflict with or obstruct implementation of applicable air quality plans related to the attainment of ozone. Similarly, the construction and operational mass emissions thresholds for PM correlate to the SMAQMD's permitting offset trigger levels, which prevents deterioration of ambient air quality and ensures projects do not worsen the region's attainment status (SMAQMD 2015). Therefore, projects whose emissions do not exceed the recommended PM thresholds of significance would also not conflict with or obstruct implementation of the applicable air quality plans related to PM.

The SMAQMD has developed a screening threshold to assist in determining if NOx emissions (an ozone precursor and contributor of PM formation) from constructing a project in Sacramento County will exceed SMAQMD's construction emissions significance thresholds. The screening level was developed by the SMAQMD, using default construction inputs into the California Emissions Estimator Model (CalEEMod).

The two phases of the project do not exceed the screening thresholds established by SMAQMD in that the project site is less than 35 acres and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity and thereby can be determined that the project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. However, since all construction projects, regardless of screening level, must implement the District's Basic Construction Emissions Control Practices, Mitigation Measure AQ-1 – Basic Construction Emissions Control Practices has been included. The project will not conflict or obstruct implementation of the applicable air quality plan. Impacts would be ***less than significant with mitigation***.

- b. *Would the project result in 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?*

As discussed in (a) above, the project screens out of construction ozone precursor emissions. Most particulate matter emissions (PM, PM₁₀ and PM_{2.5}) are generated in the form of fugitive dust during ground disturbance activities (such as during the grading phase), and PM emissions in the form of equipment exhaust and road dust. SMAQMD allows utilization of the same NOx screening level described above for assessing PM emissions;

similarly, if a project incorporates BMPs, is less than 35 acres in size and meets all the limitations listed above, the project is considered to have a less than significant impact on air quality as it relates to particulate matter (PM_{2.5} and PM₁₀).

The project is within the screening criteria for construction related impacts related to air quality. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply (AQ-1).

The SMAQMD has established screening levels for ozone precursors (ROG and NO_x) and particulate matter emissions (PM₁₀ and PM_{2.5}) related to operations of a project. The operational screening levels are based on the maximum size of certain types of projects (e.g., residential, retail, schools, etc.) and the screening levels can be used to determine if the operational component of a proposed project will exceed the significance thresholds (note that the operational screening table is not applicable to industrial developments). It should be noted that the use of the screening table assumes that projects will implement the District's Operational Best Management Practices – this includes compliance with District's Rules and Regulations regarding wood burning devices, water heaters, generators, etc.; compliance with California Building Energy Efficiency Standards (Title 24, Part 6); and compliance with California Green Building Code (Title 24, Part 11).

Per the SMAQMD operational screening levels, a retail strip mall of less than 185,000 square feet would not exceed the threshold for ozone precursors (ROG and NO_x) and retail strip mall developments of 460,000 square feet or less would be below the operational threshold for PM. The project meets the SMAQMD's screening levels for both construction and operational emissions and impacts are *less than significant with mitigation*.

- c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Health Effects Screening

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

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

Screening Model was prepared by SMAQMD for five locations throughout the Sacramento region for two scenarios: two times and eight times the threshold of significance level (2xTOS and 8xTOS). The corresponding emissions levels included in the model for 2xTOS were 164 lb/day for ROG and NO_x, and 656 lb/day under the 8xTOS for ROG and NO_x (SMAQMD 2020).

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

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

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

Discussion of Project Impacts: Criteria Pollutant Health Risks

Since the project was below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Table IS-2 and Table IS-3.

Table IS-2: PM_{2.5} Health Risk Estimates

PM _{2.5} Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
-----------------------------------	------------------------	--	--	---	--

		(Mean)	(Mean)		
Respiratory					
Emergency Room Visits, Asthma	0 - 99	1.1	1.1	0.0058%	18419
Hospital Admissions, Asthma	0 - 64	0.075	0.070	0.0038%	1846
Hospital Admissions, All Respiratory	65 - 99	0.36	0.32	0.0016%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.20	0.18	0.00075%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000098	0.000092	0.0024%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0090	0.0085	0.0028%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.020	0.019	0.0026%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.033	0.032	0.0026%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.12	0.11	0.0023%	5052
Mortality					
Mortality, All Cause	30 - 99	2.4	2.2	0.0049%	44766
Notes:					
<ol style="list-style-type: none"> 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 <i>Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District</i>. 					

Table IS-3: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km	Incidences Across the 5-Air-District Region Resulting	Percent of Background Health Incidences Across the 5-	Total Number of Health Incidences Across the
-----------------------	------------------------	---	---	---	--

		Modeling Domain Resulting from Project Emissions (per year) ^{2,5} (Mean)	from Project Emissions (per year) ² (Mean)	Air-District Region ³	5-Air-District Region (per year) ⁴
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.090	0.071	0.00036%	19644
Emergency Room Visits, Asthma	0 - 17	0.40	0.34	0.0058%	5859
Emergency Room Visits, Asthma	18 - 99	0.66	0.56	0.0045%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.056	0.047	0.00016%	30386
Notes:					
<ol style="list-style-type: none"> 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 <i>Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District</i>. 					

Again, it is important to note that the "model outputs are derived from the numbers of people who would be affected by [the] project due to their geographic proximity and based on average population through the Five-District-Region. The models do not take into account population subgroups with greater vulnerabilities to air pollution, except for ages for certain endpoints" (SMAQMD 2020). Therefore, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with project implementation to specific health outcomes. While the effects noted above could manifest in individuals, actual effects depend on factors specific to each individual, including life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even if this specific medical information was known about each individual, there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects listed in the tables. Ultimately, the health effects associated with the project, using the SMAQMD guidance "are conservatively estimated, and the actual effects may be zero" (SMAQMD 2020).

Conclusion

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

While there is no established threshold for the potential health effects, given that the project meets the SMAQMD's screening criteria for PM₁₀ and PM_{2.5} and Ozone precursors, the impacts of expose sensitive receptors to substantial pollutant concentrations are *less than significant*.

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

While retail or commercial projects can occasionally generate odors associated with fast food, vehicles or cleaning products, these odors do not adversely affect substantial number of people. Impacts would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

AQ-1: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

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

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

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

V. BIOLOGICAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Adversely affect or result in the removal of native or landmark trees?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with any local policies or ordinances protecting biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is currently vacant consisting of grass, weedy plants, and remnants of the previous mobile home park roadway and other concrete surfaces. There are trees along Auburn Boulevard, as well as the southern and eastern portions of the project site.

SPECIAL STATUS SPECIES

A search of the California Natural Diversity Database (CNDDDB) was conducted to determine the potential habitats and species that could be present within the project site. Review of the CNDDDB species list indicates that some sensitive habitats, plants, and animals occur within the Citrus Heights quadrangle and adjacent Rio Linda quadrangle. The CNDDDB indicates

documented occurrences of Sanford's arrowhead, stinkbells, legemere, dwarf downingia, white-tailed kite, tricolor blackbird, Swainson's hawk, burrowing owl, bank swallow, vernal pool fairy shrimp, northwestern pond turtle, and steelhead within the specific quadrangles. However, the database does not indicate the presence of any of the above listed species within the project limits. The closest occurrence of the species listed above (i.e. stinkbells) is approximately 1.3 miles east of the project and there is no habitat present on the site to support this species. The project site as well as the areas surrounding it are urbanized and developed consisting of either hardscape or landscape planting with no wetlands, streams or other waters present. Therefore, there is no habitat present for Sanford's arrowhead, legemere, dwarf downingia, vernal pool fairy shrimp, northwestern pond turtle or steelhead so these species would not be present on site. There is no nesting habitat for tricolor blackbird and it is unlikely that the site would be used for foraging given that the site has been graded and the general lack of vegetation. Similarly it is unlikely that bank swallows would use the site, as the site is lacking suitable nesting habitat.

The trees onsite could be used for nesting by white-tailed kite and Swainson's hawk. The existing open space on site could provide both nesting and foraging habitat for burrowing owl, and foraging opportunities for white-tailed kite and Swainson's hawk. Raptors within the Sacramento region include tree-nesting species such as the red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as "special animals" due to concerns over nest disturbance: Cooper's hawk, sharp-shinned hawk, golden eagle, northern harrier, and the discussed white-tailed kite.

TREES

Information for this section is from the Arborist Report and Tree Inventory Summary, prepared by Acorn Arboricultural Services, Inc. (Acorn) dated October 30, 2023 and updated July 8, 2024 (Appendix A). Field reconnaissance and inventory efforts found 63 trees measuring 4 inches in diameter and larger, measured at breast height (dbh) within the proposed project area (Appendix B and Plate IS-4). The area surveyed included the parcels for both Phase One and Phase Two. The survey found 10 non-native trees on the parcels consisting of Laurel, Modesto Ash, Privel, Camphor, Pecan, Cedar and Tree of Heaven. The remaining 53 trees were native oaks consisting of Valley Oak or Interior Live Oak. The arborist recommended that five of the 10 non-native trees be removed due to condition issues. The oaks varied in condition from poor to fair but not oaks were recommended for removal based on their condition. All oak tree removals (26) would be due to construction activities during the development of the two phases.

REGULATORY SETTING

FEDERAL REGULATIONS

MIGRATORY BIRD TREATY ACT

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

STATE REGULATIONS

STATE ENDANGERED SPECIES ACT

With limited exceptions, the California Endangered Species Act (CESA) of 1984 protects state-designated endangered and threatened species in a way similar to FESA. For projects on private property (i.e. that for which a state agency is not a lead agency), CESA enables CDFW to authorize take of a listed species that is incidental to carrying out an otherwise lawful project that has been approved under CEQA (Fish & Game Code Section 2081).

CALIFORNIA FISH AND GAME CODE, SECTION 3503.5 - RAPTOR NESTS

Section 3503.5 of the Fish and Game Code makes it unlawful to take, possess, or destroy hawks or owls, unless permitted to do so, or to destroy the nest or eggs of any hawk or owl.

LOCAL REGULATIONS

COUNTY OF SACRAMENTO GENERAL PLAN

The Conservation Element of the Sacramento County General Plan (under Policy CO-58) currently provides protection to various ecosystems. Specifically, it “ensures no net loss of wetlands, riparian woodlands, and oak woodlands.” The General Plan also seeks to protect landmark and heritage trees (collectively referred to as “protected trees”). “Landmark trees” are defined as ones that are “especially prominent and stately.” “Heritage trees” are defined as native oaks that exceed 60 inches in circumference. Policies CO-137, CO- 138, CO-139, CO-140, and CO-141 encourage protection and preservation of landmark and heritage trees, and Policy CO-145 requires mitigation by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed.

Native Oak Trees

The Sacramento County General Plan Conservation Element contains several policies aimed at preserving native trees within the County. These are:

- CO-137. Mitigate for the loss of native trees for road expansion and development consistent with General Plan policies and/or County Tree Preservation Ordinance.

- CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson's hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.

Conservation and preservation of native oaks is the primary intent of these policies. When development requires removal of native oaks, compensation for tree loss may be achieved by on or off-site replacement or payment into a Tree Preservation Fund pursuant to County policy.

Non-Native Trees

In addition to the above policies for native oak trees, the Sacramento County General Plan Conservation Element and Environmental Justice Element contain several policies aimed at preserving urban canopy within the County. These are:

- CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy shall be calculated using the 15-year shade cover values for tree species.
- CO-146. If new tree canopy cannot be created on-site to mitigate for the nonnative tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.
- CO-147. Increase the number of trees planted within residential lots and within new and existing parking lots.
- EJ-23. The County will achieve equitable tree canopy in Environmental Justice (EJ) communities. To achieve this policy projects that remove tree canopy will be required to replace 125 percent of the canopy removed.

IMPACT DISCUSSION

- a. *Would the project have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

As discussed above, based on the review of CNDDDB no special status species are expected to be found within the project limits of the site. However, the project site contains a large number of trees that could be used for nesting by various bird and raptor species that are not listed as endangered, threatened, or of special concern, but are nonetheless afforded general protections by the Fish and Game Code and the MBTA. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take." Under Fish and Game Code 3503.5. Thus, take may occur both as a result of cutting down a tree or as a result of activities nearby an active nest which cause nest abandonment.

Due to construction and tree removal, concerns over nest disturbance to raptors such as red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier, and raptor species identified as "special animals", is a potential impact. Mitigation for migratory (Mitigation Measure BIO-1) and raptor (Mitigation Measure BIO-2)

nest protection is included; impacts to migratory birds and raptors would be *less than significant with mitigation*.

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The project site does not contain riparian habitat or other sensitive natural community identified by either CDFW or USFWS. **No Impact.**

- c. *Would the project 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?*

The project site does not contain any state or federally protected wetlands. **No Impact.**

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

The project site is surrounded by developed urban land, resulting in limited terrestrial landscape linkages for wildlife. Some wildlife species may use portions of the project site for foraging, breeding, or other functions; however, the project site itself does not link two significant natural areas, and it is not considered a wildlife migration corridor. As discussed above, the project could impact nesting of some bird species temporarily during construction, but with mitigation would not be significant; therefore, impacts associated with wildlife movement would be *less than significant*.

- e. *Would the project adversely affect or result in the removal of native or landmark trees?*

A total of 63 trees are present on the project site consisting of 10 non-native trees and 53 native oak trees as shown in Appendix B and Plate IS-4. A total of 27 native oaks will be removed with the implementation of Phases One and Two totaling 448.7 inches; removal of these 27 native oak trees will require mitigation as set forth in BIO-3 -Native Tree Removal.

In addition, the remaining 26 oaks could be impacted due to improvements for the access drive and construction for building the storage facility in Phase One and the subsequent development of the commercial center in Phase Two. Additionally, although not identified on the site plans, development standards require a solid wall between commercial and residential uses. Therefore, native tree protection measures are recommended for these remaining trees and included as Mitigation Measure BIO-4. Mitigation Measure BIO-4 also includes recommendations for reducing impacts due to constructing a wall near oak trees.

Because the final development plans for Phase Two are unknown, changes to the conceptual footprint could result in additional encroachments to native oak trees. Any encroachment greater than 50 percent of the oak tree dripline is considered to adversely affect the tree, as most of the roots would be impacted. This would result in the rapid decline of the health of the tree and eventually kill the tree. Therefore, any encroachment greater than 50 percent will be considered removal of the tree and the proponent shall follow mitigation measure BIO-3 for full compensation. Impacts to native trees are *less than significant with mitigation*.

- f. *Would the project conflict with any local policies or ordinances protecting biological resources?*

Ten non-native trees have been identified on the project site, and five of these have been recommended for removal due to condition. The remaining five are clustered at the northeast corner of the project site. Based on the tentative design and layout of the Phase Two commercial center, it is anticipated that these 5 remaining non-native trees will not be impacted by development. The trees would likely be incorporated into the design of Phase Two, as they are located within the area that will be landscaped and part of the required setbacks for commercial development adjacent to residential uses. The non-native trees to be removed are in poor health/condition. At the time of future development, standard landscape requirements would require tree plantings that are above and beyond the canopy of the poor condition trees to be removed. As such, impacts related to non-native tree canopy are less than significant.

With the mitigation measures set forth for native trees and nest protections, the project would be consistent with local policies and ordinance protecting biological resources; therefore, the impacts would be *less than significant*.

- g. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The project is not located within the area of any adopted Habitat Conservation Plan. **No Impact.**

ENVIRONMENTAL MITIGATION MEASURES

As the project will be conducted in two phases and it is unknown the time period that could elapse between the phases, the implementation of BIO-1 and BIO-2 may need to be completed prior to the start of each phase.

BIO-1: MIGRATORY BIRD NEST PROTECTION

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

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

BIO-2: RAPTOR NEST PROTECTION

If construction activity (which includes clearing, grubbing, or grading) is to commence within 500 feet of suitable nesting habitat between February 1 and September 15, a survey for raptor nests shall be conducted by a qualified biologist. The survey shall cover all potential tree and ground nesting habitat on-site and off-site up to a distance of 500 feet from the project boundary. The survey shall occur within 30 days of the date that construction will encroach within 500 feet of suitable habitat. The biologist shall supply a brief written report (including date, time of survey, survey method, name of surveyor and survey results) to the Environmental Coordinator prior to ground disturbing activity. If no active nests are found during the survey, no further mitigation will be required. If any active nests are found, the Environmental Coordinator and California Department of Fish and Wildlife shall be contacted to determine appropriate avoidance/protective measures. The avoidance/protective measures shall be implemented prior to the commencement of construction within 500 feet of an identified nest.

BIO-3: NATIVE TREE REMOVAL

The removal of native oak trees as shown on Appendix B shall require mitigation totaling the equivalent of 448.7 dbh inches, which shall be compensated for by planting in-kind native trees equivalent to the dbh inches lost, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. On-site preservation of native trees that are less than 6 inches (<6 inches) dbh, may also be used to meet this compensation requirement. Native trees include: valley oak (*Quercus lobata*), and interior live oak (*Quercus wislizenii*).

Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. A total of 448.7 inches will require compensation.

Equivalent compensation based on the following ratio is required:

- one preserved native tree < 6 inches dbh on-site = 1 inch dbh
- one D-pot seedling (40 cubic inches or larger) = 1 inch dbh
- one 15-gallon tree = 1 inch dbh
- one 24-inch box tree = 2 inches dbh
- one 36-inch box tree = 3 inches dbh

Prior to the approval of Improvement Plans or Building Permits, whichever occurs first, a Replacement Tree Planting Plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the Environmental Coordinator for approval. The Replacement Tree Planting Plan(s) shall include the following minimum elements:

1. Species, size and locations of all replacement plantings and < 6-inch dbh trees to be preserved
2. Method of irrigation
3. If planting in soils with a hardpan/duripan or claypan layer, include the Sacramento County Standard Tree Planting Detail L-1, including the 10-foot deep boring hole to provide for adequate drainage

4. Planting, irrigation, and maintenance schedules;
5. Identification of the maintenance entity and a written agreement with that entity to provide care and irrigation of the trees for a 3-year establishment period, and to replace any of the replacement trees which do not survive during that period.
6. Designation of 20-foot root zone radius and landscaping to occur within the radius of trees < 6 inches dbh to be preserved on-site.

No replacement tree shall be planted within 15 feet of the driplines of existing native trees or landmark size trees that are retained on-site, or within 15 feet of a building foundation or swimming pool excavation. The minimum spacing for replacement native trees shall be 20 feet on-center. Examples of acceptable planting locations are publicly owned lands, common areas, and landscaped frontages (with adequate spacing). Generally unacceptable locations are utility easements (PUE, sewer, storm drains), under overhead utility lines, private yards of single family lots (including front yards), and roadway medians.

Native trees <6 inches dbh to be retained on-site shall have at least a 20-foot radius suitable root zone. The suitable root zone shall not have impermeable surfaces, turf/lawn, dense plantings, soil compaction, drainage conditions that create ponding (in the case of oak trees), utility easements, or other overstory tree(s) within 20 feet of the tree to be preserved. Trees to be retained shall be determined to be healthy and structurally sound for future growth, by an ISA Certified Arborist subject to Environmental Coordinator approval.

If tree replacement plantings are demonstrated to the satisfaction of the Environmental Coordinator to be infeasible for any or all trees removed, then compensation shall be through payment into the County Tree Preservation Fund. Payment shall be made at a rate of \$325.00 per dbh inch removed but not otherwise compensated, or at the prevailing rate at the time payment into the fund is made.

BIO-4: NATIVE TREE PROTECTION

Oak trees as listed in Appendix B are located adjacent to the proposed drive and parking areas, shall be preserved and protected as follows:

- a. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb shall constitute the dripline protection area of each tree. Limbs must not be cut back in order to change the dripline. The area beneath the dripline is a critical portion of the root zone and defines the minimum protected area of each tree. Removing limbs that make up the dripline does not change the protected area.
- b. Any protected trees on the site that require pruning shall be pruned by a certified arborist prior to the start of construction work. All pruning shall be in accordance with the American National Standards Institute (ANSI) A300 pruning standards and the International Society of Arboriculture (ISA) "Tree Pruning Guidelines."
- c. Temporary protective fencing shall be installed at least one foot outside the driplines of the oak trees prior to the start of construction work, in order to avoid damage to the trees and their root systems. Protective fencing shall be installed at one foot from the limit of work for retaining wall construction. Protective fencing must be maintained through the duration of construction.

- d. No signs, ropes, cables (except those which may be installed by a certified arborist to provide limb support) or any other items shall be attached to the protected trees. Small metallic numbering tags for the purpose of preparing tree reports and inventories shall be allowed.
- e. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the driplines of protected trees.
- f. Any fence/wall that will encroach into the dripline protection area of any protected tree shall be constructed using grade beam wall panels and posts or piers set no closer than 10 feet on center. Posts or piers shall be spaced in such a manner as to maximize the separation between the tree trunks and the posts or piers in order to reduce impacts to the trees.
- g. Drainage patterns on the site shall not be modified so that water collects or stands within, or is diverted across, the dripline of any protected tree.
- h. No trenching shall be allowed within the driplines of protected trees. If it is absolutely necessary to install underground utilities within the dripline of a protected tree, the utility line shall be bored and jacked under the supervision of a certified arborist.
- i. Where soil disturbance (scraping, grading, trenching, and excavation) is necessary, an ISA Certified Arborist will provide specifications for this work, including methods for root pruning, backfill specifications and irrigation management guidelines.
- j. The construction of impervious surfaces within the driplines of protected trees shall be stringently minimized. When it is absolutely necessary, a piped aeration system per County standard detail shall be installed under the supervision of a certified arborist.
- k. No sprinkler or irrigation system shall be installed in such a manner that sprays water or requires trenching within the driplines of protected trees. An above ground drip irrigation system is recommended.
- l. Landscaping beneath oak trees may include non-plant materials such as bark mulch, wood chips, boulders, etc. The only plant species which shall be planted within the driplines of oak trees are those which are tolerant of the natural semi-arid environs of the trees. A list of such drought-tolerant plant species is available from the Office of Planning Environmental Review. Limited drip irrigation approximately twice per summer is recommended for the understory plants

VI. CULTURAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Information for this section is from the Cultural Resource Assessment for APN 240-0062-034, prepared by Peak & Associates, Inc. (Peak) dated June 12, 2024. The studies conducted on the project area were designed to determine whether any prehistoric or historic period sites were present; and if present, whether the resources are eligible for listing in the California Register of Historical Resources.

The project site was previously developed as a mobile home park (Sierra Vista Mobile Home Park). Based on historical aerial imagery, the mobile home park was vacated around 2006.

A search of the files of the North Central Information Center of the California Historical Resources Information System was conducted on May 27, 2024. According to this review, no archeological surveys have been reported to the Information Center that covered this property or any adjacent properties. No resources have been recorded in or adjacent to the property.

Peak performed a survey of the project on May 27, 2024. The survey was conducted by walking parallel transects spaced no more than 5 meters apart. There were no impediments to walking straight line transects and no limits on visibility of the ground surface. Peak reported that during the inspection, signs of prehistoric occupation, or prehistoric use of the area, were not observed. The only sign of historic-era use (i.e., mobile home park) was the line of oak trees on one border and the many fragments of concrete on the surface.

REGULATORY SETTING

State historic preservation regulations affecting this project include the statutes and guidelines contained in the California Environmental Quality Act (CEQA; Public Resources Code sections 21083.2 and 21084.1 and sections 15064.5 and 15126.4 (b) of the CEQA Guidelines). CEQA Section 15064.5 requires that lead agencies determine whether projects may have a significant effect on archaeological and historical resources. Public Resources Code Section 21098.1 further cites: A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

An “historical resource” includes, but is not limited to, any object, building, structure, site, area, place, record or manuscript that is historically or archaeologically significant (Public Resources Code section 5020.1).

California Health and Safety Code Sections 7050.5, 7051, And 7054

These sections collectively address the illegality of interference with human burial remains, as well as the disposition of Native American burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code Section 15064.5(e)

This law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. The section establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project and establishes the Native American Heritage Commission as the entity responsible to resolve disputes regarding the disposition of such remains.

IMPACT DISCUSSION

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*

Based on record search review and the site survey completed by Peak, no historical resources were identified as being present on the site. **No Impact.**

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

Although the survey found no evidence of archaeological resources it is possible that there are archaeological resources present. Mitigation has been recommended to address the potential of unanticipated discovery. Therefore, with mitigation, project impacts to cultural resources will be ***less than significant with mitigation.***

- c. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

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

ENVIRONMENTAL MITIGATION MEASURES

CR-1: UNANTICIPATED DISCOVERY OF CULTURAL RESOURCES

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

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

CR-2: UNANTICIPATED DISCOVERY OF HUMAN REMAINS

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

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

- The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

VII. ENERGY

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is currently vacant and does not use energy.

REGULATORY SETTING

Construction in California is subject to "Title 24" which refers to the California Building Standards Code, a comprehensive set of regulations that govern the design, construction, and maintenance of buildings. It's essentially the state's building code and includes various aspects like energy efficiency, fire safety, accessibility, and structural integrity.

IMPACT DISCUSSION

- a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The development of the site will require the use of fuel for equipment to grade the project site, access driveway, and the subsequent construction of the storage facility and any future commercial buildings. These structures would be required to comply with Title 24 of the Building Code, which requires that buildings use energy efficient building methods and the use of energy efficient heating and cooling systems and lighting. Therefore, the project would not result in wasteful, inefficient, or unnecessary energy consumption. Impacts would be **less than significant**.

- b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The project will be required by code to use energy efficient building methods and the use of energy efficient heating and cooling systems and lighting. Development of the commercial center would not create an obstruction to the development of renewable energy facilities or prevent the implementation of energy efficiency programs. Impacts would be **less than significant**.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

VIII. GEOLOGY AND SOILS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
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 or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is vacant and relatively flat, with remnants of a prior mobile home park on the northern 3.5-acre lot. The project site is surrounded by commercial and residential development and the required infrastructure such as roads and utilities.

REGIONAL GEOLOGY

The project area lies within the Great Valley geomorphic province of California (the Great Valley), which is a gently sloping to relatively flat alluvial plain. The Great Valley is bounded by the Coast Mountain Ranges on the west, the Sierra Nevada on the east, and the Klamath and Cascade Mountain Ranges on the north. The Great Valley is a trough in which sediments eroded from the adjacent mountain ranges have been deposited since the Jurassic Era (approximately 160 million years ago) (California Geological Survey, 2002). The underlying geology within the project area consists of Pleistocene-age (2.6 million years to 11,700 years ago) sediments of the Riverbank Formation (Alluvium).

TOPOGRAPHY

The project area is on the broad, flat alluvial plain in the Sacramento Valley of the Great Valley. The topography of the site is relatively flat with an average elevation of 50 feet above mean sea level (msl).

SEISMIC HAZARDS

FAULTS AND SEISMICITY

There are no active or potentially active faults in the vicinity of the project area. The closest Alquist-Priolo Earthquake Fault Zone is located approximately 51 miles southwest of the project area, known as the Green Valley Fault (California Department of Conservation, 2022). According to the Safety Element Background of the Sacramento County General Plan, there are two fault zones to the east and west of the County. The Midland Fault Zone is approximately 28 miles southwest and the Bear Mountain Fault Zone is approximately 16 miles east of the project area. The closest active fault to the project area is the Dunnigan Hills Fault, approximately 25 miles northwest. Alquist-Priolo zones are faults that can result in ground failure whereas the other faults would result in ground shaking without failure.

GROUND SHAKING

Ground shaking is the result of faulting and is the primary cause of earthquake damage to man-made structures. The 2016 Earthquake Shaking Potential for California map indicates the project area is in an area with lower probability of ground shaking.

LIQUEFACTION AND LANDSLIDES

Liquefaction happens when ground shaking causes water-saturated, loosely packed soils to lose strength and take on the characteristics of a fluid. Factors contributing to liquefaction include soil type, depth to groundwater, and level and duration of ground shaking. Landslides are the downslope movement of earthen materials down a slope.

The California Geological Survey (CGS) of the California Department of Conservation, maintains an online mapping program called the California Earthquake Hazards Zone Application ("EQ Zapp") that allows anyone to check whether a property is in an earthquake hazard zone. Reference of the EQ Zapp indicates that the project site and project area are not located in either liquefaction or landslide hazard zones (California Department of Conservation, 2022).

SOILS

According to the Natural Resources Conservation Service's (NRCS) Web Soil Survey, the project area is underlain with the following soil types: Urban Land and Urban Land-Xerarents Fiddyment complex (Table IS-4).

Table IS-4: Project Area Soil Descriptions

Soil Name	Slope Class	Soil Depth	Drainage	Erosion Potential	Linear Extensibility ¹
Urban Land ²	N/A	N/A	N/A	N/A	N/A
Urban Land-Xerarents Fiddyment complex	0-8 percent	Impervious to moderately deep	Impervious to well drained	Slight	Low
<p><i>Source: Custom Soil Resource Report for Sacramento County, California; 4600 Auburn Boulevard (Natural Resources Conservation Service, 2024)</i></p> <p><i>Notes:</i></p> <p>¹ Linear extensibility is used to determine the shrink-swell potential of soils.</p> <p>² Urban Land soil type includes artificial fill and/or impervious surface areas.</p>					

Urban Land-Xerarents-Fiddyment. This unit is in filled areas and in other areas on hills, mainly north of the American River, in the central part of the county. Urban lands with well drained soils that are moderately deep to very deep over consolidated sediments or are moderately deep over a cemented hardpan.

PALEONTOLOGICAL RESOURCES

Paleontological resources are the fossilized evidence of organisms preserved in the geologic record. Fossils are considered nonrenewable resources that are protected by federal, state, and local environmental laws and regulations. Sedimentary rocks, and some volcanic and metamorphic rocks, have potential to yield significant fossiliferous deposits.

The project area has been previously developed with residential and commercial land uses and existing roadways. Therefore, the near surface deposits are likely comprised of Holocene-age artificial fill material. Based on the geologic mapping shown in the County General Plan's Conservation Element Background Report, the artificial fill is underlain by deposits of Pleistocene-age Fair Oak Formation, with sediments deposited approximately 130,000-450,000 before present (B.P.). Fair Oaks Formation is considered a low sensitivity for paleontological resources.

REGULATORY SETTING

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONE ACT

The Alquist-Priolo Earthquake Fault Zoning Act was signed into California law on December 22, 1972, to mitigate the hazard of surface faulting to structures for human occupancy.

The act has three main provisions:

- 1) It directs the state's California Geological Survey agency (then known as the California Division of Mines and Geology) to compile detailed maps of the surface traces of known active faults. These maps include both the best known location where faults cut the surface, and a buffer zone around the known trace(s);
- 2) It requires property owners (or their real estate agents) to formally and legally disclose that their property lies within the zones defined on those maps before selling the property; and
- 3) It prohibits new construction of houses within these zones unless a comprehensive geologic investigation shows that the fault does not pose a hazard to the proposed structure.

IMPACT DISCUSSION

- a. *Would the project 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 or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

The project area is not within or adjacent to a fault zone under the Alquist-Priolo Earthquake Fault Zone Act. As described above, the nearest fault zone on the Alquist-Priolo Earthquake Fault Zoning Map is the Green Valley Fault, approximately 51 miles southwest of the project area. Therefore, implementation of the project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known fault as delineated on the most recent Alquist-Priolo Fault Zone Map and there would be ***no impact***.

- ii. *Strong seismic ground shaking?*

The closest active fault to the project area is the Dunnigan Hills Fault, approximately 25 miles to the northwest. The intensity of ground shaking is dependent on the proximity to the epicenter of the site, the magnitude of the earthquake, and site soil conditions. The 2016 Earthquake Shaking Potential for California map (California Department of Conservation 2022) indicates the project area has a lower probability of shaking hazard intensities. Phase One of the project will construct two one-story structures as part of the development of the storage facility. Although final design of the three buildings that would be constructed as part of the development of Phase Two, both Phase One and Phase Two structures will be required to meet the current building codes. As such the buildings would be able to withstand any likely ground shaking that may occur. Therefore, this would have a ***less than significant impact***.

- iii. *Seismic-related ground failure, including liquefaction?*

The project area is not within a liquefaction hazard zone, therefore, there would be ***no impact***.

- iv. *Landslides?*

The project area is not within a landslide hazard zone; therefore, there would be ***no impact***.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Construction activities such as site clearing and grubbing, earthmoving activities, and excavation would result in soil disturbance, temporarily exposing soils to wind and water erosion. During construction, the contractor would be required to comply with all applicable provisions and requirements of the Construction Stormwater General Permit. Additionally, since the implementation of the project would disturb more than one acre of land a project specific Stormwater Pollution Prevention Plan (SWPPP) would be required. The SWPPP would include BMPs and erosion control measures to be implemented during construction activities. Therefore, construction of the project would not result in substantial soil erosion, and this would have a ***less than significant impact***.

As part of the construction approval process the project proponents are required to prepare and implement a Level 4 drainage plan, which would analyze the drainage of the site using the construction plans of the project. With the implementation of the drainage report's findings, there would be no operational soil erosion. Operational impacts would be ***less than significant***.

c. Would the project 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?

Soil types in the project area are urban land or an urban land complex. Additionally, the project area is underlain by stable Pleistocene-age sediments of the Fair Oaks Formation. Therefore, implementation of the project would result in ***no impact*** from construction in unstable soil.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

The soil types within the project area have low linear extensibility ratings (refer to Table IS-6). Therefore, there would be ***no impact*** from expansive soil.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Project will be required to connect to public sewer. ***No Impact***.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Project site is not within an area known to contain paleontological resources or unique geologic features. ***No Impact***.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

IX. GREENHOUSE GAS EMISSIONS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Greenhouse gases (GHG), including CO₂, methane (CH₄), and nitrous oxide (N₂O), are naturally occurring atmospheric gases that insulate Earth as part of the greenhouse effect, which is responsible for keeping temperatures on Earth conducive to life. After solar radiation is absorbed by the earth’s surface, infrared radiation is emitted into the atmosphere, which is then absorbed by GHGs. Some of the infrared radiation is re-emitted back to the earth’s surface, warming the atmosphere. However, human activities such as combustion of fossil fuels, have increasingly emitted excess GHGs into the atmosphere causing the greenhouse effect to intensify and Earth’s climate to warm at an unprecedented rate.

The Global Warming Potential (GWP) of GHGs compares the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time the gas remains in the atmosphere (its “atmospheric lifetime”). The GWP of each gas is measured relative to CO₂. Therefore, CO₂ has a GWP of one. GHGs with lower emissions rates than CO₂ may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than CO₂ (i.e., high GWP). For example, N₂O has a GWP of 273, meaning that one ton of N₂O has the same contribution to the greenhouse effect as approximately 273 tons of CO₂. The concept of CO₂ equivalence (CO₂e) is used to account for the different GWP potentials of GHGs. GHG emissions are typically measured in terms of pounds or tons of CO₂e and are often expressed in metric tons (MT) CO₂e.

REGULATORY SETTING

SACRAMENTO METROPOLITAN AQMD

As discussed in the Air Quality Section, the project area is within the boundaries of the SMAQMD. The SMAQMD has developed greenhouse gas (GHG) thresholds and screening levels to provide a consistent scale to measure the significance of land use development. SMAQMD’s GHG construction and operational emissions thresholds for Sacramento County are shown in Table IS-6. The thresholds are used to evaluate a project for consistency with statewide GHG reduction targets as established in Assembly Bill (AB) 32. AB 32 is the Global Warming Solutions Act of 2006. California reached the goals set in AB 32 in 2016. As a follow up to AB 32, Senate Bill (SB) 32, was signed in 2016, which requires CARB to ensure state GHG emissions are reduced 40 percent below 1990 levels by 2030.

SACRAMENTO COUNTY CLIMATE ACTION PLAN

The County’s Climate Action Plan (CAP), adopted by the Board of Supervisors in November 2024, is a comprehensive, multi objective plan that balances environmental, economic, and community interests for the reduction of GHG emissions. Strategies and measures have been identified in the CAP to meet California’s 2020 and 2045 GHG reduction targets. Each measure is supported by implementing actions to reduce GHG emissions generated from current and future activities within the unincorporated areas of the County, including existing County facilities and operations. Upon implementation of the CAP, projects being proposed in unincorporated areas of the County would need to demonstrated compliance with applicable measures and actions.

THRESHOLDS OF SIGNIFICANCE

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. Governor’s Office of Planning and Research’s (OPR’s) Guidance does not include a quantitative threshold of significance for assessing a proposed development’s GHG emissions under CEQA. Moreover, CARB has not established such a threshold, or recommended a method for setting a threshold, for proposed development-level analysis.

In April 2020, SMAQMD adopted an update to their land development project operational GHG threshold, which requires a project to demonstrate consistency with CARB’s 2017 Climate Change Scoping Plan. The Sacramento County Board of Supervisors adopted the updated GHG threshold in December 2020 (refer to Table IS-5). SMAQMD’s technical support document, “Greenhouse Gas Thresholds for Sacramento County”, identifies operational measures that should be applied to a project to demonstrate consistency.

Table IS-5: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO₂e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO₂e	1,100 metric tons per year	10,000 metric tons per year

All projects must implement Tier 1 Best Management Practices to demonstrate consistency with the Climate Change Scoping Plan. After implementation of Tier 1 Best Management Practices, project emissions are compared to the operational land use screening levels table (equivalent to 1,100 metric tons of CO₂e per year). If a project’s operational emissions are less than or equal to 1,100 metric tons of CO₂e per year after implementation of Tier 1 Best Management Practices, the project will result in a less than cumulatively considerable contribution and has no further action. Tier 1 Best Management Practices include:

- BMP 1 – No natural gas: projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 – Electric Vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards.
 - EV Capable requires the installation of “raceway” (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

For projects that exceed 1,100 metric tons per year, then compliance with BMP 3 is also required:

- BMP 3 – Reduce applicable project VMT by 15% residential and 15% worker relative to Sacramento County targets, and no net increase in retail VMT. In areas with above-average existing VMT, commit to provide electrical capacity for 100% electric vehicles.

Projects that implement BMP 1 and BMP 2 can utilize the SMAQMD CEQA Guide’s operational screening level table (CEA Guide, Chapter 4). The screening table allows users to screen out GHG operational emissions, based on the project’s land use category and size. Projects that do not exceed the GHG screening level are screened out of further review and requirements, as it is expected that GHG emissions would not exceed 1,100 metric tons per year.

IMPACT DISCUSSION

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

As discussed in the Air Quality section above, the project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres and does not involve buildings more than 4 stories tall; demolition activities; an unusually compact construction schedule; cut-and-fill operations; or import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply (AQ-1). The project meets the Sacramento Metropolitan Air Quality Management District’s (SMAQMD) screening criteria for PM₁₀ and PM_{2.5} and Ozone precursors. As such the potential GHG emissions would be less than the SMAQMD threshold of 1,100 metric tons of CO₂e. Construction generated GHG emissions are ***less than significant***.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

Mitigation Measure GHG-1 is included such that the project will implement BMP 1 and BMP 2 in its entirety. Because the project will be required to implement BMP 1 and BMP 2, the

SMAQMD Guide allows users to screen out GHG operational emissions, based on land use categories. The project includes development of a storage facility (Phase One) and a commercial center (Phase Two) that may include different commercial and/or office uses. Per the operational screening levels, a retail strip mall up to 29,000 square feet, or a general office building up to 65,000 square feet, would be within the GHG operational screening level (i.e., less than 1,100 MT CO₂ threshold).

Although, not anticipated, one commercial use could be a restaurant or other development that would use natural gas. The project is the development of a commercial center where units for lease would be offered and therefore implementation of BMP 1 and BMP 2 would be required. However, as discussed in the Air Quality section, operational emissions would screen out. Therefore, with the requirements that BMPs would be in place, the operation of the project would not generate the levels of CO₂ that would exceed the 1,100 MT threshold. The impacts from GHG emissions are *less than significant with mitigation*.

- b. *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

As the project would generate less than 1,100 MT of CO₂e the project will not have the potential to interfere with the County meeting the goals of SB 32 (reducing greenhouse gas emissions to 1990 levels by 2030); therefore, the climate change impact of the project is considered *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

GHG-1: SMAQMD TIER 1 BEST MANAGEMENT PRACTICES FOR GHG EMISSION REDUCTIONS

The applicant may choose from one the following measures:

1. The project is required to incorporate the following Tier 1 Best Management Practices (BMPs)
 - BMP 1: No natural gas: Projects shall be designed and constructed without natural gas infrastructure.
 - BMP 2: Electric vehicle ready: Projects shall meet the current CalGreen Tier 2 standards, except all EV Capable spaces shall instead by EV Ready.
 - EV Capable requires the installation of “raceway” (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations.
2. If the project proponent chooses to propose an alternative to the above BMPs, they will need to submit documentation, to the satisfaction of the Environmental Coordinator, demonstrating that the alternatives are equivalent to Tier 1 BMPs. Documentation shall be submitted to the Environmental Coordinator prior to final approval of grading, improvement plans or building permits, whichever occurs first.

3. The project may demonstrate consistency with the CAP by implementing applicable GHG reduction measures and/or demonstrating consistency with performance standards associated with such measures, as outlined in a CAP Consistency Review Checklist adopted by Sacramento County. The CAP Consistency Checklist will ensure that the specified GHG reduction measures applicable to new development projects and performance standards are met.

X. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site was previously used as a mobile home park; however, the park was removed in the early 2000's and is currently vacant. The site contains grass and weedy vegetation and trees, with some areas having broken concrete, remnants from the interior roads and home pads of the mobile home park.

IMPACT DISCUSSION

a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The project is the development of a storage facility (Phase One) and rezone of the property and the future development of a commercial center where commercial space would be leased (Phase Two). While there is potential for hazardous material use, these materials would consist of typical cleaners, paint and the like. The implementation of the project would not result in the transport, use, or disposal of hazardous materials on a routine basis. Therefore, the impacts would be ***less than significant***.

- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

As discussed above, any hazardous materials usage would be associated with cleaning supplies, paint and adhesives. While spills may occur, these would be small, and the subsequent cleanup would result in minimal release of materials into the environment. Impacts would be ***less than significant***.

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

There is no school within one-quarter mile of the project site. The proposed storage facility, and the commercial center with leased units, are not permitted to store, handle or use acutely hazardous materials and all other potentially hazardous materials must be consistent with existing hazardous material rules and regulations. Impacts would be ***less than significant***.

- d. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The project site is not located on any hazardous material site list pursuant to Government Code § 65962.5. ***No Impact***.

- e. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed project is the development of an approximately 4.88-acre property. The project would be developed in two phases; the first being the construction of a storage facility and the second, the development of three commercial buildings. The project would not create any disruption to the surrounding road system and the proposed use of the site would be consistent with the surrounding land uses. Therefore, the project would not impair the implementation, or physically interfere, with an adopted emergency response plan or emergency evacuation plan. Impacts related to emergency response would be ***less than significant***.

- f. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

The project is within the urbanized area of Sacramento County and is outside of any state responsibility area. The site would be served by Sacramento Metro Fire Department which has a station located within the area. Impacts associated with wildfire would be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XI. HYDROLOGY AND WATER QUALITY

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Topographically, the project site is relatively flat, gently sloping towards the north, with an elevation range from approximately 94 to 96 above mean sea level. The project is within the watershed of Date Creek which is to the north and west of the project. The project site is within Non-Shaded Flood Zone “X” (Areas of Minimal Flood Hazard).

REGULATORY CONTEXT

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rains will wash the sediment into stormdrains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

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

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

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

Applicable projects applying for a County grading permit must show proof that a NOI has been filed and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the Construction General Permit, the County is required by its Municipal Stormwater Permit to verify that SWPPPs include six minimum components.

During the wet season (October 1 – April 30), the project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's Construction General Permit. During the rest of the year, typically erosion controls are not required, except in the case of predicted rain.

Erosion controls should always be the *first line of defense*, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the

second line of defense; they help to filter sediment out of runoff before it reaches the storm drains and local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

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

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

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

As part of the application process the County's Department of Water Resources will review a drainage study prepared for the project. The County has four levels of study related to the type of project. These are:

- **Level 1 – Master Plan:** The purpose of a Level 1 drainage study is to provide a guide for development within a plan area and support the Environmental Impact Report (EIR) for the following land use documents: Specific Plans, Special Planning Areas, Rezoning, Large Lot Tentative Maps and Financing Plans.
- **Level 2 – Tentative Subdivision Map:** The purpose of a Level 2 drainage study is to support the Tentative Subdivision Map (TSM) application or similar land use entitlement application. The Level 2 study shall demonstrate the general viability of the proposed TSM. The level of detail required may vary per project; however, the overall objective is to determine ability to mitigate project, confirm no adverse impacts can be achieved, and set clear expectations of viability of the proposed TSM.
- **Level 3 – Parcel Maps / Use Permits / Infill Tentative Subdivision Maps:** The purpose of a Level 3 drainage study is to support the Parcel Map, Use Permit, or minor infill Tentative Subdivision Map land entitlement applications. The Level 3 study shall identify facilities that provide flood control, conveyance of storm water, compliance with NPDES requirements (Stormwater quality facilities, Low-Impact Development (LID), and Hydromodification), (Hydromodification mitigation is only required for SFR development greater than 20 acres or HDR, commercial, and BP greater than 1 acre in size.) and overland release for the proposed entitlement.
- **Level 4 – Improvement Plans:** The Level 4 drainage study is the detailed design analysis of the drainage system for a specific project site and forms the basis for the improvement plans. The study will confirm consistency with and a final refinement of

major flood control, major trunk drainage, and compliance with NPDES requirements (Stormwater quality facilities, Low-Impact Development (LID), and Hydromodification) noted in the Level 1 and 2 or 3 study.

IMPACT DISCUSSION

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The Sacramento County Department of Water Resources has set forth the following Condition of Approval for the project:

Provide a Level 4 (design-level) drainage study for review and approval by the Sacramento County Department of Water Resources (Water Resources), consistent with the Sacramento County Hydrology Standards, Sacramento County Drainage Study Requirements, Sacramento County Improvement Standards, Sacramento Region Stormwater Quality Design Manual, and Sacramento County Floodplain Management Ordinance.

The level 4 drainage study must be reviewed and approved prior to submittal of improvement plans, or shall follow the parallel review process, and shall at a minimum:

- a. Include a preliminary grading and drainage plan.
- b. Identify the overland release path and point(s) of discharge.
- c. Demonstrate that the proposed development will have no adverse impacts to the upstream and downstream watershed during a 100-year storm event. Identify the size and location of flood control mitigation measures.
- d. Provide HGL analysis using Nolte flows for any proposed new public storm drain system.
- e. Demonstrate compliance to all necessary Low Impact Development (LID) and Stormwater Quality (SWQ) treatment measures pursuant to the current version of the *Stormwater Quality Design Manual for the Sacramento Region*.

Project compliance with requirements outlined above will ensure that project-related erosion and pollution impacts are *less than significant*.

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Sacramento Suburban Water District (SSWD), which would be the water provider for the project site, is reliant on groundwater. Beyond the use of groundwater, the District has contractual surface water rights to 26,064 acre-feet per year of surface water from the City of Sacramento; and a contract to purchase up to 29,000 acre-feet of surface water per year from Placer County Water Agency (PCWA), with a 12,000 acre-feet take or pay caveat in the agreement. SSWDs conjunctive use program has resulted in approximately 230,000 acre-feet of banked groundwater. As SSWD does rely on groundwater water, water use associated with development and operation of the project would decrease groundwater

supplies; however, this reduction would not be substantial. Furthermore, the project site is not an area of recharge, therefore, the project would not interfere with groundwater recharge. Impacts to groundwater would be *less than significant*.

- c. *Would the project 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 a substantial erosion or siltation on- or off-site;*

Compliance with the County's grading and stormwater ordinances will reduce potential impacts to *less than significant*.

ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

See response Xlc.i

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*

See response Xlc.i

iv. *impede or redirect flood flows?*

See response Xlc.i

- d. *Would the project develop in an area that is subject to 200-year urban levels of flood protection (ULOP)?*

Project is not located within an ULOP area. **No Impact.**

- e. *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

The project area is within FEMA designated Zone X. The project area is not within a tsunami or seiche zone. A site specific SWPPP would be developed for the project as part of compliance with the SWRCB Construction General Permit requirements. Therefore, the risk of release of pollutants due to inundation would be minimal and impacts would be *less than significant*.

- f. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Construction of the project would include compliance with all regulatory requirements including the development of a site specific SWPPP, adherence to the SWRCB Construction General Permit requirements, and following the conditions in the County's Stormwater Ordinance. Additionally, although the project would result in an increase in impervious surface area, construction and operation of the project would not decrease groundwater supply or inhibit groundwater recharge. Therefore, implementation of the project would not

conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and therefore would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XII. LAND USE AND PLANNING

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project is located within the Carmichael/Old Foothill Farms community. Land use policies and regulations for the area are governed by the Sacramento General Plan, the Carmichael/Old Foothill Farms Community Plan and the Sacramento County Zoning Code. Phase One parcels are both zoned General Commercial (GC) and both have a General Plan land use designation of Commercial/Office.

The Phase Two parcel (APN: 240-0062-034) is about 3.5 acres in size and has a General Plan designation of Low Density Residential (LDR). The property is on the County’s General Plan Housing Element’s Vacant Land Inventory, further identified for lower income development. This designation means that the site could be included in future zoning changes to facilitate the development of housing. However, the zoning and the Carmichael/ Old Foothill Farms community plan identify the site for high density residential uses, zoned RD-30. RD-30 is defined as a multiple family residential zone district, where the maximum density is 30 dwelling units per acre. The proposed project includes a request to rezone the 3.5-acre property from RD-30 to GC and to amend the General Plan designation from LDR to Commercial/Office (Plate IS-5 and Plate IS-6).

The future development of Phase Two for retail and office uses would not be compatible with the existing RD-30 zoning district or the LDR designation. The rezone to GC would allow for various commercial uses, such as retail, business offices, and light industrial uses. Light industrial uses include service yards, storage facilities, wholesale and all types of auto repair.

IMPACT DISCUSSION

a. *Would the project physically divide an established community?*

Phase One does not require any land use designation change to develop the proposed storage facility. Phase Two of the project would amend the General Plan designation from Low Density Residential to Commercial/Office and would also rezone the site from multiple family residential (RD-30) to General Commercial (GC). If the requested general plan amendment and rezone are approved, commercial development would be a compatible use. Although the project would not develop as residential, the construction and operation of a commercial center along the commercially developed Auburn Boulevard would not result in the division of any established community. **No Impact.**

- b. *Would the project 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?*

Although the rezoning of the site would remove the site from the Vacant Land Inventory, the Inventory as part of the County Housing Element was not adopted for the purpose of avoiding or mitigating an environmental effect. A No Net Lose analysis was performed in accordance with California Government Code §65863. The project site for the 4600 Auburn Boulevard Rezone project is identified on the Housing Element Vacant Land Inventory for 81 lower-income category units (affordable housing inventory). The proposed development of the subject parcel would not result in the development of 81 units for the lower-income category identified for the site in the Housing Element affordable housing inventory. However, there are sufficient remaining sites identified in the Housing Element inventory for the lower-income category to adequately meet the County's remaining RHNA for the planning period without the project. Therefore, impacts would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

Plate IS-5: Existing and Proposed General Plan Designation

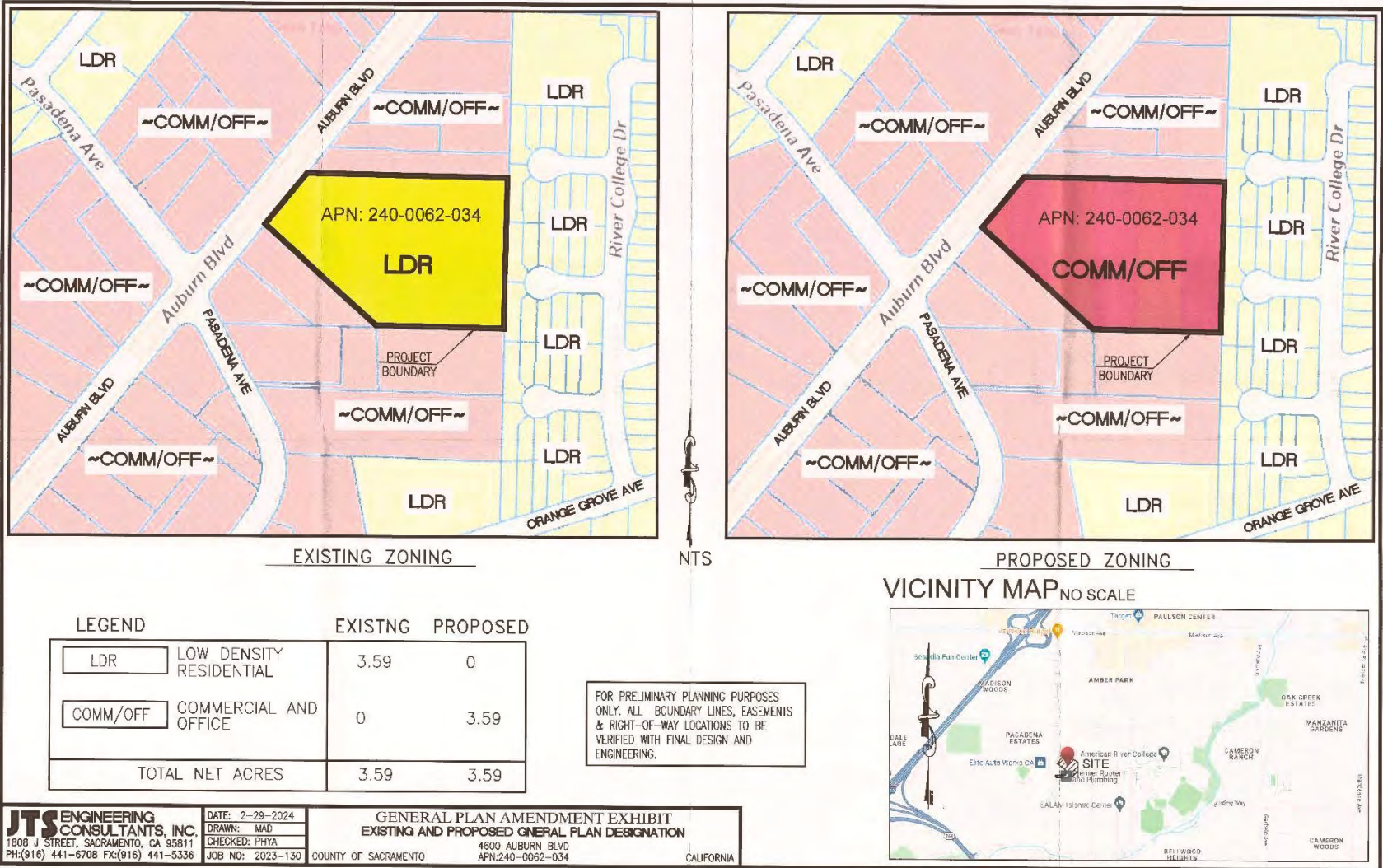
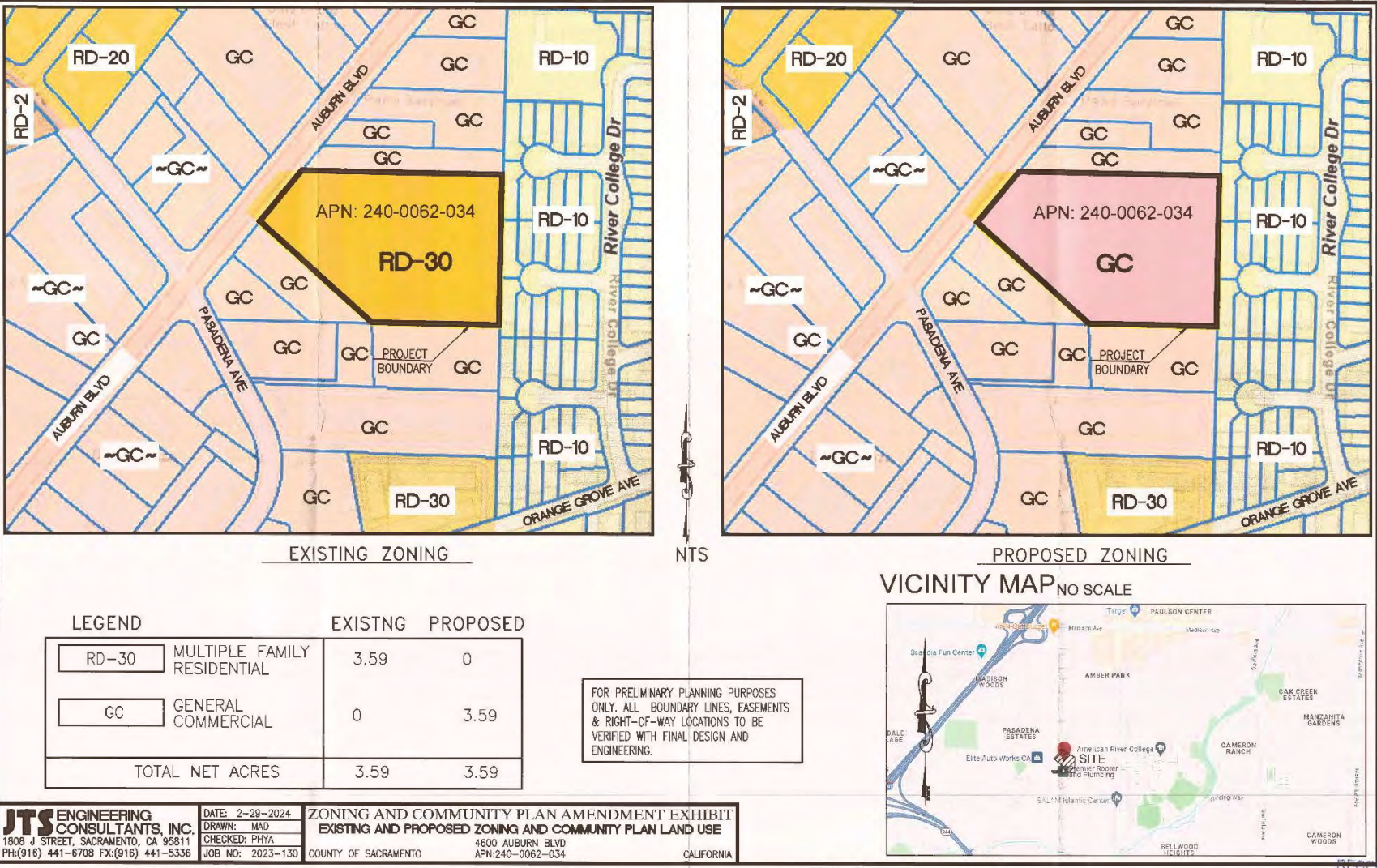


Plate IS-6: Existing and Proposed Rezone



XIII. MINERAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is currently vacant land located within the urban corridor of Auburn Boulevard. According to the County General Plan’s Conservation Element, the site is not listed as containing mineral resources.

IMPACT DISCUSSION

- a. *Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?*

The site is outside of any identified mineral bearing soils according to the County’s General Plan Conservation Element. Therefore, there would be **no impact** to mineral resources.

- b. *Would the project 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?*

The site is out of any mineral resource delineated in the County General Plan. **No Impact.**

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XIV. NOISE

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

SOUND, NOISE, AND ACOUSTICS

Sound is the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is defined as sound that is unwanted (i.e., loud, unexpected, or annoying). Acoustics is the physics of sound.

The amplitude of pressure waves generated by a sound source determines the perceived loudness of that source. A logarithmic scale is used to describe sound pressure level in terms of decibels (dB). The threshold of human hearing (near-total silence) is approximately 0 dB. A doubling of sound energy corresponds to an increase of 3 dB. In other words, when two sources at a given location are each producing sound of the same loudness, the resulting sound level at a given distance from that location is approximately 3 dB higher than the sound level produced by only one of the sources. For example, if one automobile produces a sound pressure level of 70 dB when it passes an observer, two cars passing simultaneously do not produce 140 dB; rather, they combine to produce 73 dB.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that de-emphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ears decreased sensitivity to low and extremely high frequencies instead of the frequency mid-range. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). All noise levels reported in this section are in terms of A-weighting. There is a strong correlation between A-weighted sound levels and community response to noise. As discussed above, doubling sound energy results in a 3-dB increase in sound. In typical noisy environments, noise-level changes of 1 to 2 dB are generally not perceptible by the healthy human ear; however, people can begin to detect 3-dB increases in noise levels. An increase of 5 dB is generally perceived as distinctly noticeable and a 10-dB increase is generally perceived as a doubling of loudness (Caltrans 2013). The following are the sound level descriptors commonly used in environmental noise analysis:

- Equivalent sound level (L_{eq}): An average of the sound energy occurring over a specified time period. In effect, the L_{eq} is the steady-state sound level containing the same acoustical energy as the time-varying sound that actually occurs during the same period.

The 1-hour, A-weighted equivalent sound level ($L_{eq[h]}$) is the energy average of A-weighted sound levels occurring during a 1-hour period.

- Maximum sound level (L_{max}): The highest instantaneous sound level measured during a specified period.
- Day-Night Noise Level (L_{dn}): The 24-hour L_{eq} with a 10 dB “penalty” applied during nighttime noise-sensitive hours, 10:00 p.m. through 7:00 a.m. The L_{dn} attempts to account for the fact that noise during this specific period of time is a potential source of disturbance with respect to normal sleeping hours.
- Statistical Descriptor (L_n): The n-percent exceeded level, L_n , is the sound pressure level exceeded for n percent of the time. The noise level exceeded n percent of a specific period of time, generally accepted as an hourly statistic. An L_{10} would be the noise level exceeded 10 % of the measurement period.

Sound from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, and the sound level attenuates (decreases) at a rate of 6 dB for each doubling of distance from a point/stationary source. Roadways and highways and, to some extent, moving trains consist of several localized noise sources on a defined path; these are treated as “line” sources, which approximate the effect of several point sources. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. Therefore, noise from a line source attenuates less with distance than noise from a point source with increased distance.

GROUNDBORNE VIBRATION

Groundborne vibration is energy transmitted in waves through the ground. Vibration attenuates at a rate of approximately 50 percent for each doubling of distance from the source. This approach considers only the attenuation from geometric spreading and tends to provide for a conservative assessment of vibration level at the receiver.

Vibration is an oscillatory motion that can be described in terms of the displacement, velocity, or acceleration. Vibration typically is described by its peak and root-mean-square (RMS) amplitudes. The RMS value can be considered an average value over a given time interval. The peak vibration velocity is the same as the “peak particle velocity” (PPV), generally presented in units of inches per second. PPV is the maximum instantaneous positive or negative peak of the vibration signal and is generally used to assess the potential for damage to buildings and structures. The RMS amplitude typically is used to assess human annoyance to vibration, and the abbreviation “VdB” is used in this document for vibration decibels to reduce the potential for confusion with sound decibels.

EXISTING NOISE ENVIRONMENT

The project site is currently vacant land with commercial uses to the north, south and west of the project site and residential uses to the west. The primary source of noise in the area is from traffic on Auburn Boulevard. The ambient noise levels in the vicinity of the project are not in excess of standards established by the General Plan and the County Noise Ordinance.

REGULATORY SETTING

According to the Sacramento County General Plan Policy NO-1 and the noise levels presented in General Plan Noise Element Table 1 Noise Standards for New Uses Affected by Traffic and Railroad Noise, commercial buildings and uses within areas affected by traffic noise are not considered to have sensitive outdoor areas, but have interior area noise level standards of 50 dB. According to Table 1, residential uses have exterior and interior levels of 65 dB and 45 dB, respectively. Additionally, General Plan Noise Element Table 2 Non-Transportation Noise Standards states that for commercial projects there are no Median (L50)/Maximum (Lmax) levels established for outside areas and interiors have 45/65 dB levels. As there are adjacent residential areas to the project the Median/Maximum are 55/75 dB for exteriors and 35/55 dB for interiors.

Policy NO-8 requires that noise associated with construction activities shall adhere to the County Code requirements. Specifically, Section 6.68.090(e) addresses construction noise within the County.

Policy NO-13 states that “Where noise mitigation measures are required to satisfy the noise level standards of this Noise Element, emphasis shall be placed on the use of setbacks and site design to the extent feasible, prior to consideration of the use of noise barriers.”

The County’s Noise Ordinance establishes maximum allowable exterior and interior noise levels for affected land uses. The ordinance generally limits exterior noise levels (measured at residential land and agricultural land uses) to a maximum of 55 dBA during any cumulative 30-minute period during the daytime hours (7 a.m.–10 p.m.), and 50 dBA during any cumulative 30-minute period during the nighttime hours (10 p.m.–7 a.m.). The ordinance sets somewhat higher noise limits for noise of shorter duration; however, noise shall not exceed 75 dBA during the day and 70 dBA at night. Activities generally considered to be exempt from the noise standards include construction activities (provided that they occur between the daytime hours of 6 a.m.–8 p.m., on weekdays, and 7 a.m.–8 p.m. on Saturday and Sunday), school athletic and entertainment events, activities conducted on public parks and playgrounds, and transportation noise.

IMPACT DISCUSSION

- a. *Would the project 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?*

Construction noise: For both phases, project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).

Operational noise: Noise for the storage facility developed in Phase One would consist of individuals visiting their storage units to either drop off or pick up items. The noise would come from the cars going to the unit, sounds of the opening the unit and sounds related to the movement of materials/objects into or out of the unit. As the needs for individuals visiting the unit would be varied, the numbers of individuals present at the facility would vary; it is

likely that peak times for visits would occur in the mornings or afternoons, with the greatest level of traffic occurring on Saturdays. During peak periods, the number of visitors would typically range around ten individuals to less than five at any given time. The storage buildings are orientated so that the storage units do not open toward residential uses and the buildings are setback at least 50 feet from the residential property lines to the east. Furthermore, zoning code development standards for commercial uses adjacent to residential zoned properties require a solid masonry wall at the property line. Consistent with the development standards, the site plan for Phase One shows that there will be a 6-foot tall masonry wall at the eastern property boundary.

Similarly, Phase Two development will need to comply with commercial development standards, including appropriate 50-foot setbacks and a masonry wall adjacent to residentially zoned property boundaries. The preliminary design of the Phase Two commercial development includes orientating the buildings so that entrances face away from the residential properties and parking spaces are not adjacent to the residential properties further reducing noise related nuisances. Compliance with setbacks and inclusion of the required masonry wall will buffer noise generated by the commercial uses; it is therefore not expected that the proposed commercial development would result in noise standards to be exceeded.

Impacts from construction and operation of the project's two phases would be *less than significant*.

- b. *Would the project generation of excessive groundborne vibration or groundborne noise levels?*

The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary. Impacts would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XV. POPULATION AND HOUSING

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is currently vacant land within the urban corridor of Auburn Boulevard. Commercial uses are to the north and south of the project site, while to the east is a residential neighborhood. The parcels of Phase One are zoned General Commercial and the parcel of Phase Two is currently zoned residential.

IMPACT DISCUSSION

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The development of Phase One is a storage facility on land zoned General Commercial. The proposed development of the parcels would not induce unplanned population growth. The parcel for Phase Two of the project includes rezoning the property to general commercial from a residential zone. The two phases of the project would not induce unplanned population growth in that the project would not develop new homes nor would the project's infrastructure improvements promote new population growth in the area. Impacts would be **less than significant**.

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

While the project site was used as a mobile home park in the past any displacement of housing occurred and was accounted for prior to the development of the proposed project. Impacts would be **less than significant**.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XVI. PUBLIC SERVICES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. 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:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Fire protection: The project site is served by Sacramento Metro Fire Department. The two nearest stations are Station 24 located at 4942 College Oak Drive in Carmichael/Old Foothill Farms Community and Station 103 located at 824 Watt Avenue in Arden Arcade. Station 24 is approximately 0.4-mile northeast of the project site and Station 103 is approximately 1.8 miles to the southwest.

Police protection: The project site is served by Sacramento County Sheriff Department. The project is located within the Department’s North Division’s District 2 (North). The nearest Sheriff’s station is the Garfield Station located at 5510 Garfield Avenue which is approximately 1.5 miles to the northeast of the project.

Schools: The project site is within the San Juan Unified School District. The closest school to the project site is Trinity Christian School a private elementary school which is 0.8 mile northwest of the project and the closest public school being Madison Elementary which is adjacent to Trinity Christian northeast of the project. To the south of the project is Orange Grove Adult Education and American River College is to the east of the project.

Parks: The project site is within the Arcade Creek Recreation and Park District. The closest park is Hamilton Street Park located 0.4-mile west of the project. To the southwest is Del Paso Regional Park which is within the City of Sacramento approximately 0.7-mile from the project.

Library: Nearest library to the project site is Sylvan Oaks a Sacramento County Library located at 67900 Auburn Boulevard in Citrus Height approximately 3.6 miles northeast of the project.

IMPACT DISCUSSION

- a. *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:*

Fire protection? While the proposed project would increase the amount of developed structures in the service area of Stations 24 and 103. It would not require the development of new physical structures or alteration to existing structures to maintain acceptable service ratios or response times. Impacts would be ***less than significant***.

Police protection? The development of the project would not require changes to the existing facilities to provide protection to the project. The project is within the existing service area of Sheriff's north division and would not require the construction of new facilities to cover the site or affect response times. Impacts would be ***less than significant***.

Schools? The project would generate employees, but they would be drawn from the existing area and the project would not generate new students. **No Impact**.

Parks? While there will be employees hired for the project's operation these would come from the existing labor pool. The project would not generate new users of parks that would require the development of new facilities. Impacts would be ***less than significant***.

Other public facilities? While there will be employees hired for the project's operation these would come from the existing labor pool. The project would not generate new users of libraries or other public facilities that would require the development of new facilities. Impacts would be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XVII. RECREATION

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is within the Arcade Creek Recreation and Park District. The closest park is Hamilton Street Park located 0.4-mile west of the project. To the southwest is Del Paso Regional Park which is within the City of Sacramento approximately 0.7-mile from the project. The commercial Scandia Family Fun Center is approximately 0.6-mile to the northwest of the project beyond I-80.

IMPACT DISCUSSION

- 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?*

While there will be employees hired for the project’s operation these would come from the existing labor pool. The project would not generate new users of parks or other recreational facilities that would require the development of new or expanded facilities. Impacts would be **less than significant**.

- 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?*

See response XVII a.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XVIII. TRANSPORTATION

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project area is located along Auburn Boulevard located between Pasadena Avenue to the south and Myrtle Avenue to the north. Auburn Boulevard is classified as a Thoroughfare Pre - 2030 in the General Plan Transportation Plan (Sacramento County, 2019b), with two lanes in each direction and a center turn lane between. The Sacramento Area Council of Governments (SACOG) work vehicle miles travelled (VMT) Screening Map shows the project site exists in a VMT efficient area that produces VMT equal to or less than the average regional VMT.

REGULATORY SETTING

SENATE BILL 743

On September 27, 2013, SB 743 was signed into law, supporting previous climate focused and transportation legislation, including the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the California Global Warming Solutions Act of 2006 (AB 32), as well as the Complete Streets Act (AB 1358), which requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users. In December 2018, the Office of Land Use and Climate Innovation (formerly Office of Planning and Research (OPR)) issued a final advisory to guide lead agencies in implementing SB 743, Technical Advisory on Evaluating Transportation Impacts in CEQA (Office of Planning and Research, 2018).

The Technical Advisory observes that vehicle miles traveled (VMT) is the most appropriate metric to use in evaluating a project’s transportation impacts under CEQA. Residential and office projects VMT is assessed using efficiency metrics. Specifically, VMT for residential projects is assessed on a per capita basis while office projects use a per employee basis. The Technical Advisory does not recommend a threshold approach for school projects. Lead agencies have the discretion to set or apply their own significance thresholds in lieu of those

recommended in the Technical Advisory, provided they are based on substantial evidence. Cities and counties still can still use metrics such as level of service (LOS) for other plans, studies, or network monitoring. However, LOS and similar metrics that measure the social inconvenience of traffic congestion are not to be used for evaluating significant environmental impacts under CEQA.

CEQA GUIDELINES SECTION 15064.3

Following the passage of SB 743, CEQA Guidelines Section 15064.3 established that VMT is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose an appropriate methodology and establish thresholds for evaluating VMT.

In October 2020, the County adopted the Transportation Analysis Guidelines (TAG) to provide guidance on VMT analysis. The TAG was developed to assist transportation engineers and planners in the preparation of CEQA transportation analyses for land development and transportation projects, pursuant to SB 743 (Sacramento County, 2020).

IMPACT DISCUSSION

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Both Phases will use the new access drive as a connection with Auburn Boulevard. The drive will be required to meet County Department of Transportation requirements, which would include provisions associated with the future development of a bike lane along Auburn Boulevard. Therefore, the project would not conflict with the existing transportation plans of the County. Impacts would be ***less than significant***.

- b. *Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?*

Both the storage facility and the development of a commercial center would be considered Local Serving Uses under the County's TAG and are in an area of VMT efficiency and as such the project would be consistent with VMT standards established by the County. Impacts would be ***less than significant***.

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Any improvements associated with the construction of the access drive would reviewed by the County Department of Transportation and subject to revisions in accordance with the departments engineering requirements. The proposed use of the site is a storage facility and subsequent commercial development. Vehicles using the site would be compatible with the surrounding roadways. Therefore, impacts would be ***less than significant***.

- d. *Would the project result in inadequate emergency access?*

Site access and internal vehicle movements will meet fire department standards and regulations; therefore, impacts to emergency access would be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XIX. TRIBAL CULTURAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:				
i. 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), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Information for this section is from the Cultural Resource Assessment for APN 240-0062-034, prepared by Peak & Associates, Inc. (Peak) dated June 12, 2024.

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects on August 27, 2024. No tribes requested consultation with the County.

As the project includes the request to amend the General Plan and the Community Plan in accordance with Senate Bill (SB) 18 letters were sent to those tribes identified by the Native American Heritage Commission. The notices described the project and included the cultural resource assessment completed by Peak & Associates. No tribes requested consultation with the County.

REGULATORY SETTING

Please see section VI for discussion of cultural resource regulations in addition specific regulations related to tribal cultural resources include:

GOVERNMENT CODE SECTIONS 6254(R) AND 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to “Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.” Section 6254.10 specifically exempts from disclosure requests for “records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency.”

ASSEMBLY BILL 52

Tribal cultural resources, as defined by Assembly Bill (AB) 52, Statutes of 2014, in Public Resources Code (PRC) Section 21074, are sites, features, places, cultural landscapes, sacred places and objects, with cultural value to a Tribe.

SENATE BILL 18

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code §65300 et seq.) and specific plans (defined in Government Code §65450 et seq.).

Consultation is to occur with federally recognized California Native American tribes, or non-federally recognized California Native American tribes, that are within the local government's jurisdiction, are on the contact list maintained by the Native American Heritage Commission (NAHC), and are affected by the proposed plan adoption or amendment. Gov. Code §65352.3.

IMPACT DISCUSSION

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:*
 - i. *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)?*

As presented in the Cultural Resource Assessment the site is not listed or eligible for listing in either the California Register of Historical Resources or any local register. **No Impact.**

- ii. *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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

As no tribe requested consultation, the County determined that no tribal cultural resources are present on the project site. However, as recommended mitigation has been included to address the potential of unanticipated discovery of cultural resources or human remains impacts to tribal cultural resources would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

See CR-1 and CR-2 in section VI.

XX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project area is in the urbanized Carmichael/Old Foothill Farms community with existing utilities including electric provided by Sacramento Municipal Utility District (SMUD); gas from Pacific Gas and Electric (PG&E); telecommunications (AT&T, Verizon and others), water from Sacramento Suburban Water District; and sewer service from Sacramento Area Sewer District (SacSewer). Waste disposal is handled by Sacramento County Waste Management and Recycling which includes two transfer stations and the Kiefer Landfill.

IMPACT DISCUSSION

- a. *Would the project 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?

While the site has been used as a mobile home park in the past, it is likely that new on-site infrastructure will be needed to connect to the existing infrastructure located within Auburn Boulevard. While there would be new infrastructure required on-site, the addition of this infrastructure and connections would not require the relocation or construction of expanded facilities. Therefore, the impacts would be ***less than significant***.

- b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

As discussed in Section XI, the Sacramento Suburban Water District (SSWD) relies on groundwater to provide water service. As such, the proposed project would result in an increased use of groundwater. However, as previously discussed in the Hydrology and Water Quality impact discussion above, SSWD uses groundwater; however, in addition to groundwater, SSWD has contractual surface water rights from the City of Sacramento for use of additional water. SSWD provided comments regarding connection requirements and did not comment that water would not be available for the proposed project. It is expected that SSWD has sufficient water supply to ensure service to the project now and in the foreseeable future without substantial reduction in water supplies. Therefore, the impacts to groundwater would be ***less than significant***.

- c. Would the project 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?*

SacSewer has the capacity to serve the project without requiring additional infrastructure or capacity. Impacts to groundwater would be ***less than significant***.

- d. Would the project 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?*

The Kiefer Landfill has capacity to accommodate solid waste until the year 2050. Impact would be ***less than significant***.

- e. Would the project result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?*

Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. Stormwater facility extension impacts would be ***less than significant***.

- f. Would the project result in substantial adverse physical impacts associated with the provision of electric or natural gas service?*

Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the

extension of lines would take place within areas already proposed for development as part of the project. Impacts from utility extension would be *less than significant*.

- g. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Implementation of the project would comply with all applicable solid waste statutes and regulations, including CALGreen and Article 6 (Construction and Demolition Debris) of Chapter 6.20, Title 6, of the Sacramento County Code. Therefore, there would be *no impact*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XXI. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is relatively flat, undeveloped vacant land containing vegetation and native oak trees. Surrounding the site are commercial structures to the north, west and south, and to the east is a residential neighborhood with numerous homes. The project site is served by Sacramento Metro Fire Department. The project site is not within a designated high fire hazard severity zone or state responsibility area (SRA) set forth by the California Department of Forestry and Fire Protection (CAL FIRE).

IMPACT DISCUSSION

a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project site is not in a very high, or high fire hazard severity zone and would not impair the emergency response plan or evacuation plan. Development will include adequate fire access roadways for all emergency responders and fire hydrants to the satisfaction of Sac Metro standards. Therefore, there would be **no impact**.

b. *Would the project, 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?*

The project site is not within any fire hazard severity zone or SRA. Development of the site would not increase the existing fire hazard, which is very low due to the developed nature of

the project area. The storage facility and future commercial center would continue to be served by existing Sac Metro fire stations. Therefore, there would be ***no impact***.

- c. *Would the project 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?*

The project site is not located in an SRA and is not designated in a fire hazard severity zone. The project site is surrounded by urban development and will be required to comply with County standards (such as utility installation), Sac Metro standards (such as adequate fire access roadways and fire hydrants) and all building code requirements (such as sprinklers or fire rating walls); compliance will ensure impacts are ***less than significant***.

- d. *Would the project 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?*

The project is outside of any state responsibility area and would be served by Sacramento Metro Fire Department. Furthermore, the project site is generally flat and not within a fire hazard severity zone; therefore, the project would not result in exposure of people or structures to significant risks from flooding or landslides following a wildfire and would have ***no impact***.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XXII. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IMPACT DISCUSSION

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?*

As discussed above there are potential impacts to biological resources (trees) cultural resources and greenhouse gas emissions. However, mitigation has been recommended that would reduce the impacts to **less than significant** level.

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.)*

The impacts identified are local and would not be considered cumulatively considerable as potential impacts can be mitigated to less than significant. No past, present, or foreseeable future projects in the vicinity of the project area have been identified that would combine with

the project to cause cumulative impacts. Therefore, incremental effects are not cumulatively considerable and impacts are *less than significant*.

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

As mitigated the project would not cause either directly or indirectly substantial adverse effects on human beings. Impacts are therefore *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

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

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for the 4600 Auburn Boulevard Rezone as follows:

1. It shall be the responsibility of the project applicant to reimburse the County for all expenses incurred in the implementation of the Mitigation Monitoring and Reporting Program (MMRP), including any necessary enforcement actions. The applicant shall pay an initial deposit of **\$11,300.00**, which includes administrative costs of **\$1,097.00**. Over the course of the project, the Office of Planning and Environmental Review will regularly conduct cost accountings and submit invoices to the applicant when the County monitoring costs exceed the initial deposit.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

LIST OF PREPARERS

LEAD AGENCY

Environmental Coordinator:	Julie Newton
Senior Planner:	Michelle Nagao
Project Leader:	Kurt Steinert
Office Manager:	Kim Reading
Administrative Support:	Justin Maulit

REFERENCES/CITATIONS

Branum, D., Chen, R., Petersen, M., & Wills, C. (2016). *Earthquake Shaking Potential for California*. digitized by the California Department of Conservation. Retrieved January 7, 2025, from <https://www.conservation.ca.gov/cgs/psha>

California Department of Conservation. (2022). EQ Zapp: California Earthquake Hazards Zone Application. Sacramento, CA. Retrieved January 7, 2025, from <https://www.conservation.ca.gov/cgs/sh/eqzapp>

Sacramento County. (2017). *General Plan Conservation Element*. Retrieved May 9, 2025, from <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/GeneralPlan.aspx>

APPENDIX A

Arborist Report and Tree Inventory Summary, Acorn Arboricultural Services, Inc. October 30, 2023 and update July 8, 2024

APPENDIX B

Tree Impact Summary Table

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
85	Grecian Laurel	2, 2, 3, 4	6	Poor to Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project, but is near the parking lot and could be impacted by construction activities	
86	Modesto Ash	18	15	Poor to Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project, but is near the parking lot and could be impacted by construction activities	
87	Camphor	6	6	Poor	Remove arborist recommended		N/A (condition)
88	Pecan	12	20	Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project, but is near the parking lot and could be impacted by construction activities	
89	Privet	4, 4, 5	13	Poor	Remove arborist recommended		N/A (condition)
90	Privet	4, 4, 6	14	Poor to Fair	Retain	On the eastern boundary of the project site. Within the	

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
						landscaped area of the project, but is near the parking lot and could be impacted by construction activities	
91	Modesto Ash	15	25	Poor to Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project, but is near the parking lot and could be impacted by construction activities	
92	Modesto Ash	8	15	Poor	Remove arborist recommended		N/A (condition)
4301	Valley Oak	13	14	Fair	Retain	Tree is within the landscape strip of Auburn Boulevard	
4302	Interior Live Oak	12	22	Fair	Retain	Tree is within the landscape strip of Auburn Boulevard	
4303	Interior Live Oak	19	22	Fair	Retain	Tree is within the landscape strip of Auburn Boulevard	
4304	Valley Oak	20	25	Fair	Remove		20 in
4305	Valley Oak	12	18	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway or	BIO-4

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
						detention facility.	
4306	Valley Oak	16	20	Poor to Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway or detention facility.	BIO-4
4308	Deodar Cedar	28	20	Poor	Remove arborist recommended		N/A (condition)
4310	Interior Live Oak	22.1	22	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway or detention facility.	BIO-4
4311	Valley Oak	15	24	Poor to Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway or detention facility.	BIO-4
4312	Valley Oak	26.2	26	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from	BIO-4

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
						development of driveway	
4313	Valley Oak	17	18	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway	BIO-4
4314	Valley Oak	9	12	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway	BIO-4
4315	Valley Oak	16	22	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway	BIO-4
4316	Valley Oak	13	20	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway	BIO-4
4317	Valley Oak	8	12	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment	BIO-4

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
						from development of driveway	
4318	Interior Live Oak	12	17	Fair	Retain	Tree is within the landscape strip of the southern boundary, may have encroachment from development of driveway	BIO-4
4320	Interior Live Oak	11	15	Fair	Retain	Tree is within the landscape strip may have encroachment from development of Phase One parking	BIO-4
4321	Valley Oak	18	23	Fair	Remove		18 in
4322	Interior Live Oak	9	12	Fair	Retain	Tree within the landscape strip may have encroachment from development of Phase One parking	BIO-4
4323	Valley Oak	11	20	Fair	Retain	Tree within the landscape strip may have encroachment from development of Phase One parking	BIO-4
4324	Valley Oak	14	17	Fair	Remove	No shown as removed; however, given location would be impacted by parking development resulting in removal or loss	14 in

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
4325	Valley Oak	12	13	Fair	Retain	Tree within the landscape strip may have encroachment from development of Phase One parking	BIO-4
4326	Tree of Heaven	30	23	Poor to Fair	Remove		N/A arborist recommended
4327	Valley Oak	21.9	22	Poor to Fair	Remove		21.9 in
4328	Valley Oak	26	26	Poor	Remove		26 in
4329	Valley Oak	27.6	30	Poor to Fair	Remove		27.6 in
4330	Valley Oak	21	18	Poor to Fair	Remove		21 in
4331	Valley Oak	12	12	Fair	Remove		12 in
4332	Valley Oak	16	16	Fair	Remove		16 in
4333	Valley Oak	25	24	Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project	
4334	Valley Oak	35	27	Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project, but is near the parking lot and could be impacted by construction activities	BIO-4
4335	Valley Oak	19	22	Poor to Fair	Remove	On the eastern boundary of the project site. Within the landscaped area of the project, but is near the parking lot and could be impacted by	19 in

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
						construction activities	
4336	Valley Oak	12.2	15	Fair	Retain	On the eastern boundary of the project site. Within the landscaped area of the project	
4337	Valley Oak	31.4	30	Fair	Retain	On the eastern boundary of the project site. Within the setback area of the project	
4338	Valley Oak	19	22	Poor to Fair	Retain	On the eastern boundary of the project site. Within the setback area of the project	
4339	Valley Oak	15	18	Fair	Retain	On the eastern boundary of the project site. Within the setback area of the project	
4342	Valley Oak	10	15	Fair	Remove	Will be removed for parking in Phase Two	10 in
4347	Valley Oak	16.6	23	Poor to Fair	Removed	Will be removed for parking in Phase Two	16.6 in
4353	Interior Live Oak	18	23	Fair	Remove	Will be removed for driveway in Phase One	18 in in
4355	Valley Oak	14	18	Poor to Fair	Remove	Will be removed for driveway in Phase One	14 in
4358	Valley Oak	14.1	16	Fair	Remove	Will be removed for parking in Phase Two	14.1 in

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
4360	Valley Oak	30	35	Fair	Remove	Within the development envelope of Phase Two	30 in
4361	Valley Oak	22	20	Fair	Remove	Within the development envelope of Phase Two	22 in
4362	Valley Oak	13.5	15	Fair	Remove	Within the development envelope of Phase Two	13.5 in
4363	Valley Oak	8	10	Fair	Remove	Within the development envelope of Phase Two	8 in
4364	Valley Oak	11	16	Poor to Fair	Remove	Within the development envelope of Phase Two	11 in
4365	Valley Oak	9	15	Poor to Fair	Remove	Within the development envelope of Phase Two	9 in
4366	Valley Oak	12	16	Fair	Remove	Within the development envelope of Phase Two	12 in
4367	Valley Oak	15	15	Fair	Remove	Within the development envelope of Phase Two	15 in
4368	Valley Oak	16	24	Fair	Retain	On the eastern boundary of the project site. Within the landscaped setback area of the project	
4369	Interior Live Oak	13	23	Fair	Retain	On the eastern boundary of the project site. Within the landscaped setback area of the project	

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Potential Encroachment from Development	Mitigation*
4370	Valley Oak	13	18	Fair	Remove	Within the development envelope of Phase Two	13 in
4372	Valley Oak	18	23	Poor to Fair	Remove	Within the development envelope of Phase Two	18 in
4373	Valley Oak	16	18	Poor to Fair	Remove	Within the development envelope of Phase Two	16 in
4374	Valley Oak	13	24	Fair	Remove	Within the development envelope of Phase Two	13 in
Total							448.7 in

* Mitigation is inches (in) for oaks and square feet(sqft) for non-native canopy. BIO-4 is Tree protection measure for remaining trees.