



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: PLNP2021-00122

2. Title and Short Description of Project: Liberty Towers

The project consists of:

- A request for a Use Permit to allow the operation of a place of worship to exceed 150-person seating capacity.
- 48 multi-family units in six two-story, multi-family apartment buildings with a total area of 31,604 square feet. The units will be available to both church parishioners and the general public.
- 69 senior living units in a three-story, multi-family apartment building with a total area of 44,499 square feet. The units will be available to both church parishioners and the general public.
- A 5,867-square-foot, two-story office building for church administration.
- A 36,660-square-foot, multi-purpose building with amenities for church members. The building would also contain a childcare center for up to 180 children, that would be open to the general public.

3. Assessor's Parcel Number: 220-0780-001-0000

4. Location of Project: The project is located at 5132 Elkhorn Boulevard, at the southeast corner of Elkhorn Boulevard and Hillsdale Boulevard, in the North Highlands community.

5. Project Applicant: Liberty Towers Church; Attention Joshua Garner & Terry Schneider

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**

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Julie Newton

Environmental Coordinator
County of Sacramento, State of California

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Appendices

Appendix A: Helix Environmental Planning. Liberty Towers Church Project Air Quality and Greenhouse Gas Emissions Assessment. September 2, 2022.

Appendix B: Tree Associates. Arborist Report, Liberty Towers Church Project, Sacramento, California. October 27, 2021.

Appendix C: United States Department of Agriculture, Natural Resources Conservation Service. Custom Soil Resource Report for Sacramento County, California: Liberty Towers. January 22, 2025.

Appendix D: TSD Engineering, Inc. Liberty Rock Development Level 3 Drainage Study Zone 11C (PLNP2021-00122). April 14, 2023.

Appendix E: Bollard Acoustical Consultants, Inc. Environmental Noise Assessment: Liberty Rock Development, Sacramento County, California. November 24, 2021.

Appendix F: KD Anderson & Associates. Transportation Impact Analysis for Liberty Towers Sacramento County, CA. January 31, 2022.

Due to the length, Appendix A - F are 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.gov>

The direct link is:

<https://planningdocuments.saccounty.gov/ViewProjectDetails.aspx?ControlNum=PLNP2021-00122>

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

PROJECT TITLE: Liberty Towers

CONTROL NUMBER: PLNP2021-00122

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

PROJECT SPONSOR: Liberty Tower Church
5132 Elkhorn Boulevard
Sacramento, CA 95842
Contact: Joshua Garner & Terry Schneider

LOCATION: The project site is located at 5132 Elkhorn Boulevard, at the southeast corner of Elkhorn Boulevard and Hillsdale Boulevard, in the North Highlands community (Plate IS-1).

ASSESSOR'S PARCEL NUMBER: 220-0780-001-0000

GENERAL PLAN DESIGNATION: Medium Density Residential (MDR)

ZONING: Residential Density 20 (RD-20)

PROJECT DESCRIPTION

The project consists of the following entitlement requests:

1. A **Use Permit** to allow a place of worship to exceed 150-person seating capacity on a 10.46-acre parcel located in the RD-20 zoning district.

The place of worship will include:

- An existing 15,173-square-foot auditorium with a 500-seat gathering hall for weekly service use for two religious organizations (Liberty Tower and Rockland Baptist Church),
 - New construction of a 36,600-square-foot multi-purpose building that will accommodate ancillary uses and a child day care facility that will be available to the general public, and
 - New construction of a two-story, 5,867-square-foot administration building.
2. A **Special Development Permit** to allow the proposed project to deviate from the following development standards:

- Multifamily Residential Front Yard Setback (Section 5.4.3.C, Table 5.8.B): The minimum front yard setback with a Public Utilities and Public Facilities Easement (PUPF) is 26 feet. As proposed, the front yard setback of the senior housing building is 25 feet.
 - Multi-Family and Institutional Use Fences (Section 5.2.5.C.2): Either a solid wood fence or masonry wall of at least six feet in height shall be provided along the interior property lines when located adjacent to residential zoning districts, except where pedestrian connections are needed. A six-foot-tall wrought iron fence is proposed along on the eastern property line between the proposed multifamily units and adjacent residential zoning district.
 - Interior Planter Requirements - Additional for Multifamily Residential and Mixed-Use Developments (Table 5.2): Rows of parking stalls, either open or covered, shall be broken up by a tree planting every seven spaces. There are nine locations in the proposed parking lot where this requirement is not met.
3. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

The intent of the project is to provide additional housing on the subject property and to obtain a Use Permit for the existing place of worship operating on the project site. The project proposal includes interior modifications to the existing 15,173 square foot auditorium to include a 500-seat sanctuary as well as an elementary chapel, nursery, green room and other ancillary spaces to support worship services. The project also includes the addition of buildings associated with the church use, including a multi-purpose building with daycare and an administration office building.

If approved, the project would result in the following site improvements:

- 48 multi-family units in six two-story, multi-family apartment buildings with a total area of 31,604 square feet. The units will be available to both church parishioners and the general public.
- 69 senior living units in a three-story, multi-family apartment building with a total area of 44,499 square feet. The units will be available to both church parishioners and the general public.
- A 5,867-square-foot, two-story office building for church administration.
- A 36,660-square-foot, multi-purpose building with amenities for church members. The building would also contain a childcare center for up to 180 children, that would be open to the general public.

Other improvements include a basketball court, children's playground, bike storage racks and lockers, six-foot-tall fencing, trash and recycling enclosures, 3.146 acres of landscaping, 0.191 acres of bio retention facilities 1.175 acres of hardscape, 4.217 acres of asphalt parking lot, electrical vehicle charging infrastructure, lighting, new bus stop along Hillsdale Boulevard, sidewalks, curb and gutter, minor extension of existing drainage, sewer, and electrical infrastructure and facilities. See Plate IS-3, Plate IS-4 and Plate IS-5 for preliminary site plan and phasing plans.

BACKGROUND

There are currently two separate religious facilities located along Elkhorn Boulevard between Andrea Boulevard and Hillsdale Boulevard. One facility is the church associated with this document; the second facility is located on the adjacent parcel immediately to the east. Prior to a parcel split, the subject property and the adjacent property to the east were a single property with a single religious facility operating under a use permit (98-UPP-0265). The 1989 use permit for a church use with a 1,500-seating capacity and a private school with 350 students. Subsequent to the parcel split, the use permit remained in effect only on the eastern parcel and the church facility currently operating on the subject property does not have a valid use permit. The project includes a request for a use permit to allow for the operation of the existing church in compliance with Sacramento County Zoning Code regulations.

SURROUNDING LAND USES AND SETTING

The project site is approximately 10.5 acres in size and is currently developed with a church, associated parking lot, and recreational field. The church consists of an existing, approximately 15,173 square-foot auditorium building with a parking lot of 122 spaces. The auditorium has no fixed seating and has a maximum capacity as follows: 1,268 persons (standing room), 906 persons (chairs only), and 423 persons (table and chairs). Two separate church services occur on Sundays with a typical average attendance of approximately 300 people for each service. The proposed project would not increase the existing church attendance but accommodate congregants already visiting the site. The church and parking lot are located on the northern four acres of the property, and the remainder of the property is undeveloped, appearing to have been used for recreational purposes, with remnants of a baseball diamond at the southwest corner of the lot. The property immediately adjacent, to the east of the project site, is approximately 4 acres in size and is developed with a church and associated parking lot. The project site and adjacent church property are zoned RD-20.

The property is bound by Andrea Blvd on the south, Hillsdale Blvd on the west, and Elkhorn Blvd on the north. Across Andrea Blvd and Hillsdale Blvd are single-family subdivision homes, zoned RD-5. The Union Pacific (UPRR) railroad tracks are located approximately 800 feet to the east of the project site. North of the project site, across Elkhorn Blvd is a multi-family apartment complex developed on about 7.8 acres, zoned RD-20. To the northwest is a large undeveloped lot zoned RD-10. A large retail shopping complex, encompassing about 20 acres, is located approximately 700 feet southeast of the project site. This retail complex is on the north side of Elkhorn Blvd, between Andrea Blvd and Diablo Drive. Plate IS-2 illustrates the zoning designations of the project site and surrounding land uses.

Plate IS-1: Project Location



Plate IS-2: Zoning Map

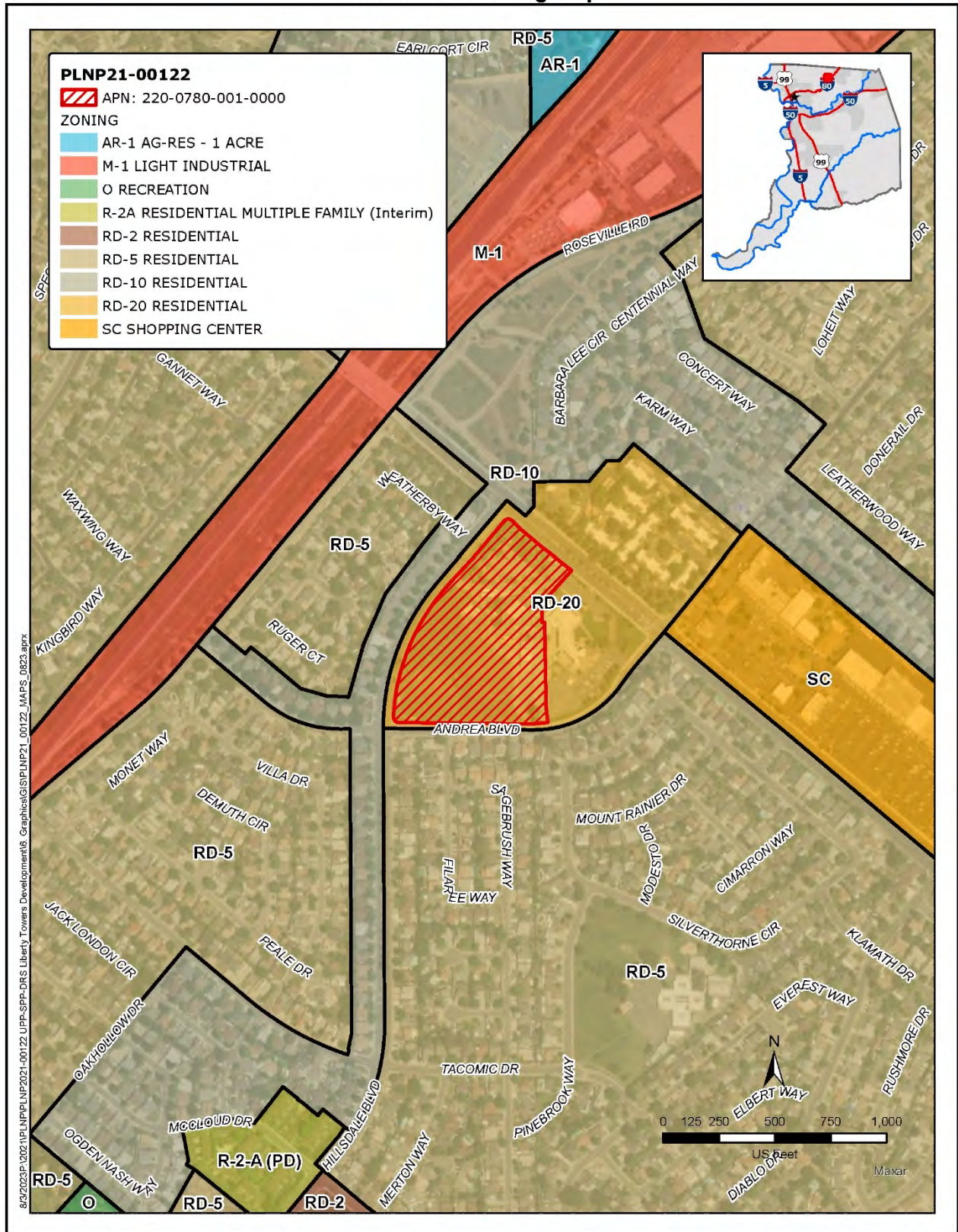


Plate IS-4: Preliminary Phasing Plan: Existing Conditions and Phase 1



Plate IS-5: Preliminary Phasing Plan: Phase 2 and Phase 3



OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

Federal: None

State of California: None

Sacramento County: Building Permits and Inspection Services, Department of Waste Management and Recycling, Department of Transportation, Engineering

Local: Sacramento Metropolitan Fire District, Sacramento Municipal Utility District, Sacramento Metropolitan Air Quality Management District, SacSewer, Sacramento Suburban Water, California American Water.

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:

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.

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.

Less than Significant indicates that a project will have an impact, but the impact is considered minor.

No Impact indicates that a project does not impact the 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 checked="" type="checkbox"/> Cultural Resources |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emission |

- Hazards and Hazardous Materials
- Mineral Resources
- Public Services
- Tribal Cultural Resources
- Hydrology and Water Quality
- Noise
- Recreation
- Utilities and Service Systems
- Land Use and Planning
- Population and Housing
- Transportation
- 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 type="checkbox"/>	<input checked="" 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 project site is surrounded by existing development, consisting mostly of single-family subdivisions, commercial retail, multi-family apartments, and community parks. The project site is not in a scenic vista and within a fully urbanized portion of Sacramento County. The proposed project will result in new church related facilities (multi-purpose building and administrative building) and two multi-family complexes.

LIGHT AND GLARE

The project area is in a developed community surrounded by areas with existing nighttime lighting from single-family subdivisions, multi-family apartments, commercial retail buildings, community parks, parking lots, and streetlights. Additionally, the developed portion of the project site has existing nighttime lighting from the church use and associated parking lot area.

SCENIC HIGHWAY

The project area is not within a viewshed of any designated or eligible local or state scenic highway. Garden Highway is a County designated scenic corridor and is approximately 12.2 miles southwest of the project area. River Road (State Route (SR) 160) is the closest state designated scenic highway, approximately 18 miles southwest of the project area.

IMPACT DISCUSSION

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

No impact. The proposed project will not have any impact on a scenic vista as the project site is surrounded by residential and commercial developments and is not located within a scenic vista – ***no impact.***

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

No impact. In Sacramento County, the only designated and recognized state scenic highway is River Road/ Highway 160, from the Sacramento City Limits at the town of Freeport (northern boundary) to the southern tip of the Delta at Antioch Bridge. As the project site is approximately 18 miles from River Road, the proposed project will not have an impact on any state scenic highway – ***no impact.***

- c. *Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views¹ 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?*

Less than significant. The project site is located within an urbanized area, surrounded by existing development consisting of mostly single-family subdivisions, a church, and commercial retail. The proposal consists of a use permit for the church due to the multi-family zoning of the project site and the multi-family residential component of the proposal is consistent with the existing zoning designation of the site (RD-20). Development standards require landscaping along public street frontages, as well as within parking lots of most development projects. Landscaping, especially frontage landscaping, is intended to provide shade, screen facilities, soften the views and edges of the built environment, and provide natural transitions, all which increase the aesthetics of the built environment. The proposed project includes a request for a special development permit to not install tree planters at nine locations throughout the parking lot. If approved, this deviation will not have a substantial impact to the scenic quality in the urban area since the project will remain consistent with the requirements for frontage landscaping and the parking lot shade requirements – ***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?*

Less than significant. The proposed project will have to install parking lot lights and must provide a minimum of 1.0-foot-candle illumination throughout the parking lot consistent with County development standards. Parking lot lights must be angled downward and away from adjoining properties and the public right-of-way. Lights on the buildings are to be bright

enough to deter crime but not be a nuisance to adjacent sensitive receptors (such as residential lots). The increase in light as a result of this project will not be substantial and would not adversely affect the nighttime views in the area, as the area already contains lighting common to residential subdivisions, streetlights and traffic signals. This impact is *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts on 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.

	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 project site is surrounded by existing development, consisting mostly of single-family subdivisions, commercial retail, multi-family apartments, and community parks. The project site is not located on, or in the vicinity of, any lands used for agriculture or designated as farmland. Sacramento County does not contain any forest lands and does not have any zoning designations related to forest land uses.

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?*

No impact. The Farmland Mapping and Monitoring Program designates the project site as Urban and Built-Up Land. The project will not have an impact to farmlands – **no impact.**

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

No impact. Since the project site is located within an urbanized area, surrounded by urban developments and zoned for medium density residential uses (RD-20), the project will not have an impact as it relates to conflicts with agricultural uses, agricultural zoning or Williamson Act contracts—**no impact.**

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

No impact. The project site is surrounded by urban development and is not in the vicinity of any existing agricultural uses. The project will therefore not conflict with existing agricultural 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))?*

No impact. Sacramento County does not have any forest lands and does not have any zoning classifications for forest lands or timberlands - **no impact.**

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

No impact. Sacramento County does not have any forest lands and does not have any zoning classifications for forest lands or timberlands - **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?*

No impact. The project site is not located near existing farmlands or agricultural operations; therefore, the proposed project will not result in a conversion of any existing farmland to non-agricultural 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 site is located approximately 2.5 miles east of McClellan Airport. The project site is located outside of the associated safety zones and is not located within the airport’s noise contours.

IMPACT DISCUSSION

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

No impact. The project site is located approximately 2.5 miles east of the nearest airport. The project site is located outside of the McClellan Airport safety zones; therefore, the project would not result in safety hazard for people residing or working in the vicinity of an airport— **no impact**.

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

No impact. The project site is located approximately 2.5 miles east of the nearest airport. The project site is located outside of McClellan’s Airports established noise level contours; therefore, the project would not expose people residing or working in the project area to aircraft noise levels 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?*

No impact. The project site is located approximately 2.5 miles east of the nearest airport. The project site is located outside of the McClellan Airport safety zones; therefore, the project would not result in a safety hazard for people residing or working in the vicinity of an airport— *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?*

No impact. Implementation of the project would not increase air traffic levels or change the location of air traffic patterns. Therefore, the project would not result in a change in air traffic patterns or levels that would result in a substantial safety risk— *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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 proposed project site is within the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Sacramento County is within the Sacramento Federal Nonattainment Area (SFNA) planning boundaries for ozone PM_{2.5} and PM₁₀. The Federal and California Clean Air Acts require an Air Quality Plan that consists of attainment plans and maintenance plans. Attainment plans must show how the region will attain air pollutant standards 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 for Ozone was adopted in September 2023. The Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. 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 (Table IS-1).

Table IS-1: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment (One (1) hour Standard ¹ and eight (8) hour standard)	Non-Attainment, Classification = Severe -15* (eight (8) hour ³ Standards) Attainment (One (1) hour standard ²)
Particulate Matter 10 Micron	Non-Attainment (24-hour Standard and Annual Mean)	Attainment (24-hour standard)
Particulate Matter 2.5 Micron	Attainment (Annual Standard)	Non-Attainment (24-hour Standard) and Attainment (Annual)
Carbon Monoxide	Attainment (One (1) hour and eight (8) hour Standards)	Attainment (One (1) hour and eight (8) hour Standards)
Nitrogen Dioxide	Attainment (One (1) hour Standard and Annual)	Unclassified/Attainment (One (1) hour and Annual)
Sulfur Dioxide ⁴	Attainment (One (1) hour and 24-hour Standards)	Attainment/unclassifiable ⁵
Lead	Attainment (30-Day Standard)	Attainment (Three (3) month rolling average)
Visibility Reducing Particles	Unclassified (Eight (8) hour Standard)	No Federal Standard
Sulfates	Attainment (24-hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (One (1) hour Standard)	No Federal Standard

1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data and therefore does not change.

2. Air Quality meets Federal One (1) hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009.

3. For the 1997, 2008 and the 2015 Standard.

4. Cannot be classified

5. Designation was made as part of EPA's designations for the 2010 SO₂ Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017

* Designations based on information from <http://www.arb.ca.gov/deg/changes.htm#reports>

Source: SMAQMD. "Air Quality Pollutants and Standards". Web. Accessed: January 2, 2025. <http://airquality.org/air-quality-health/air-quality-pollutants-and-standards>

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 (6) 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), which is subdivided into two (2) 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).”

Health-based air quality standards have been established for criteria air pollutants by EPA at the federal level and by CARB at the state level. 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.

Within the SVAB, SMAQMD is responsible for ensuring that air quality standards are not violated. With respect to regional air quality, Sacramento County is designated as nonattainment for the eight (8) hour ozone and 24-hour PM_{2.5} NAAQS. Sacramento County is designated as attainment or unclassified for all other criteria pollutant NAAQS. Sacramento County is currently in nonattainment for the ozone and PM₁₀ CAAQS and in attainment or unclassified for all other pollutants (Sacramento Metropolitan AQMD, 2024).

TOXIC AIR CONTAMINANTS

Toxic Air Contaminants (TACs) 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. The health effects associated with TACs are quite diverse and generally are 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.

Public exposure to TACs can result from emissions from normal operations, as well as accidental releases. Stationary sources of TACs include gasoline stations, dry cleaners, and diesel backup generators. On-road motor vehicles and off-road sources, such as construction equipment and trains, are also common sources of TACs. According to the California Almanac of Emissions and Air Quality (California Air Resources Board, 2013), most of the estimated health risk from TACs can be attributed to relatively few compounds—the most important being diesel particulate matter (DPM). Other TACs for which data are available that currently pose the greatest ambient risk in California are benzene, formaldehyde, hexavalent chromium, 1,3-butadiene, and acetaldehyde.

The greatest potential TAC emissions generally would be related to 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. Emissions of DPM are forecasted to decline; it is estimated that emissions of DPM in 2035 will be less than half those in 2010, further reducing statewide cancer risk and non-cancer health effects (California Air Resources Board, 2013).

SENSITIVE RECEPTORS

Sensitive receptors are individuals who have an increased sensitivity to air pollution and include elderly, children, individuals with chronic respiratory diseases such as asthma, emphysema, and bronchitis. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (Office of Environmental Health Hazard Assessment, 2015).

Residential areas are considered sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children and infants are considered more susceptible to health effects of air pollution due to their immature immune systems, developing organs, and higher breathing rates. As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Industrial and commercial areas are considered the least sensitive to air pollution; exposure periods are relatively short and intermittent because the majority of the workers tend to stay indoors most of the time.

The project area is in an urbanized setting surrounded by residential land uses, consisting of both single-family and multi-family developments. The closest sensitive receptors are adjacent duplexes along Hillsdale Boulevard, single-family homes along Andrea Boulevard, and multi-family apartment units along Elkhorn Boulevard. The closest schools are Liberty Towers Christian, a private school located on-site and Frontier Elementary, at the intersection of Pinebrook Way and Silverthorne Circle (approximately 0.2 miles south of the site). Foothill High and Westside Preparatory Charter (Eastside Campus) are located approximately 0.4 miles south and west, respectively, of the project parcel.

REGULATORY SETTING

Air quality in Sacramento County is regulated by several agencies, which include the U.S. Environmental Protection Agency (EPA), California Air Resources Board (ARB), 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.

SACRAMENTO METROPOLITAN AIR QUALITY RULES AND REGULATIONS

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, Rule 422 – Architectural Coatings and Rule 902 – Asbestos (applicable for demolition of buildings).

Because the Sacramento Valley Air Basin is in non-attainment for ozone, PM₁₀ and PM_{2.5}, the SMAQMD requires all projects implement the District's Basic Construction Emission Control Practices (also known as Best Management Practices – BMPs). Compliance and implementation of the BMPs allows for proposed projects to utilize the District's Significance Thresholds for construction and operational emissions, as shown in Table IS-2. Otherwise, without the BMPs, any emission above zero (0) pounds per day would be considered significant and inconsistent with SMAQMDs air quality plans.

Table IS-2: SMAQMD Significance Thresholds

	ROG¹ (lbs/day)	NO_x (lbs/day)	CO (µg/m³)	PM₁₀ (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 zero(0) lbs/day.

To allow the use of non-zero PM₁₀ and PM_{2.5} thresholds of significance, the SMAQMD recommends lead agencies require implementation of the following Basic Construction Emission Control Practices (BCECPs) for all land use development projects (Sacramento Metropolitan AQMD, 2020a).

- a. Water all exposed surfaces two (2) times daily. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads;
- b. Cover or maintain at least two (2) 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;
- c. 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;
- d. Limit vehicle speeds on unpaved roads to 15 miles per hour (mph);
- e. 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;
- f. Minimize idling time by either shutting equipment off when not in use or reducing time of idling to five (5) minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- g. Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

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

Less than significant with mitigation. 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. SMAQMD has adopted air quality plans pursuant to regulatory requirements under EPA and CARB. The 2017 and 2023 regional air quality management plans represent the most recent plans developed to describe and demonstrate how the Sacramento Federal Ozone Nonattainment Area (SFNA) is meeting requirements for ozone under the federal CAA in demonstrating reasonable further progress and attainment of the NAAQS for the 2008 8-hour ozone standard and 2015 8-hour ozone standard, respectively (Sacramento Metropolitan AQMD, 2017; Sacramento Metropolitan AQMD, 2023a). For particulate matter, SMAQMD developed the PM_{2.5} Maintenance Plan and Redesignation Request (Sacramento Metropolitan AQMD, 2013) to address how the region attained and would continue to attain the 24-hour PM_{2.5} standard and the PM₁₀ Implementation/Maintenance Plan and Redesignation Request for Sacramento County (Sacramento Metropolitan AQMD, 2010).

As documented in the SMAQMD CEQA Guide, the recommended mass emissions thresholds for ozone precursors correlate to the NO_x and ROG reductions from heavy-duty vehicles and land use project emission reduction requirements committed to in the ozone attainment plans; 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 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 2020a). 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 proposed project would result in the generation of emissions during construction activities. Table IS-2 presents the current significance thresholds for construction emissions established by SMAQMD. A project with emission rates below these thresholds is generally considered to have a less than significant effect on air quality (Sacramento Metropolitan AQMD, 2020b).

To allow the use of non-zero PM₁₀ and PM_{2.5} thresholds of significance, the SMAQMD recommends lead agencies require implementation of the BCECPs noted in the Regulatory Setting above.

The proposed project's construction-related activities would be required to comply with SMAQMD rules and regulations established, in part, to ensure implementation of and consistency with strategies and actions of the applicable air quality plans, including but not limited to Rule 401 (Ringlemann Chart), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), Rule 404 (Particulate Matter), and Rule 405 (Dust and Condensed Fumes). As discussed in detail in item b) below, modeled project construction emissions would not exceed the SMAQMD thresholds of significance for any criteria pollutant. However, as noted above, due to the nonattainment status of the SVAB with respect to PM₁₀ and PM_{2.5}, SMAQMD recommends that all construction projects implement the SMAQMD BCECPs; without incorporation, the project's construction activities could potentially conflict with or obstruct implementation of the SMAQMD's air quality plans for PM. Therefore, the impact would be potentially significant. To

ensure the project complies with SMAQMD BCECPs, the BCECPs have been incorporated as mitigation measure AQ-1. Impacts are *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?

Less than significant with mitigation. The nonattainment status of regional pollutants is a result of past and present development within the region, and by its very nature air pollution is largely a cumulative impact. The Sacramento region is in nonattainment for ozone and particulate matter. A single project's emissions may be individually limited but could be cumulatively considerable when considered in combination with past, present, and future emissions sources within the air basin. The SMAQMD has established project-level emissions thresholds of significance for ozone precursors (i.e., ROG and NO_x), PM₁₀, and PM_{2.5}). If a project's emissions are below the SMAQMD thresholds of significance, the project is not considered to result in a cumulatively considerable contribution to a significant impact on regional air quality (Sacramento Metropolitan AQMD, 2020a). As outlined further below, impacts are *less than significant with mitigation*.

CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS

Short-term air quality impacts are mostly due to dust (PM₁₀ and PM_{2.5}) generated by construction and development activities, and emissions from equipment and vehicle engines (NO_x) operated during these activities. Dust generation is dependent on soil type and soil moisture, as well as the amount of total acreage involved in clearing, grubbing and grading activities. Clearing and earthmoving activities comprise the major source of construction dust generation, but traffic and general disturbance of the soil also contribute to the problem. Sand, lime or other fine particulate materials may be used during construction and stored on-site. If not stored properly, materials could become airborne during periods of high winds. The effects of construction activities include increased dust fall and locally elevated levels of suspended particulates. PM₁₀ and PM_{2.5} are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

CONSTRUCTION PARTICULATE MATTER EMISSIONS

Less than significant with mitigation. Some PM₁₀ and PM_{2.5} emissions during project construction can be reduced through compliance with institutional requirements for dust abatement and erosion control. These institutional measures include the SMAQMD "District Rule 403-Fugitive Dust" and measures in the Sacramento County Code relating to land grading and erosion control [Title 16, Chapter 16.44, Section 16.44.090(K)].

HELIX Environmental Planning, Inc. (HELIX) prepared an Air Quality and Greenhouse Gas Emissions Assessment (Appendix A) for the project. CalEEMod (ver. 2020.4.0) was used to estimate construction and operational emissions for the project. The exact project phasing is unknown at this time, but the project proponent has stated construction would occur in three phases over several years. HELIX's modeling inputs assumed a very conservative, compact construction schedule of 1.5 years for commencement to completion of the project.

The maximum daily emissions for PM₁₀ and PM_{2.5} emissions were 2.4967 pounds per day and 6.0415 pounds per day, respectively. These figures are significantly lower than the 80 and 82 pounds per day significance thresholds established in Table IS-2. As noted in the Table IS-2, these significance thresholds only apply 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. Therefore, the BMPs listed above in the Basic Construction Emission Control Practices have been incorporated as Mitigation Measure AQ-1. Impacts are *less than significant with mitigation*.

CONSTRUCTION NO_x EMISSIONS

Less than significant. According to the Air Quality and Greenhouse Gas Emissions Assessment (Appendix A) prepared for the project, the maximum construction daily emissions for NO_x are 62.53 pounds per day, which is less than the 85 pounds per day significance threshold established in Table IS-2. Construction activity will consist of site preparation, grading, underground utilities, building construction, architectural coating, and paving. Impacts are *less than significant*.

OPERATIONAL EMISSIONS/LONG-TERM IMPACTS

Less than significant. Once a project is completed, additional pollutants are emitted through the use, or operation, of the site. Land use development projects typically involve the following sources of emissions: motor vehicle trips generated by the land use; fuel combustion from landscape maintenance equipment; natural gas combustion emissions used for space and water heating; evaporative emissions of ROG associated with the use of consumer products; and evaporative emissions of ROG resulting from the application of architectural coatings.

Typically, a project must be comprised of large acreages or intense uses to result in significant operational air quality impacts. Table IS-3 compares the project's maximum daily operational emissions to SMAQMD's operational emissions thresholds.

Table IS-3: Maximum Daily Operational Emissions

	ROG (lbs/day)	NO _x (lbs/day)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Operational thresholds	65	65	80	82
Project emissions	5.7	3.4	4.6	1.3
Thresholds Exceeded?	No	No	No	No

As shown in Table IS-3, the project's daily operational emissions are well below SMAQMD's established thresholds. Impacts related to operational emissions are *less than significant*.

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

Less than significant. The project is below the SMAQMD Guide screening criteria for construction emissions related to both particulate matter and ozone precursors. Additionally, the project is well below the screening criteria for operational emissions for particulate matter and ozone precursors. Construction is anticipated to last a short duration and would be required to implement dust and air quality control measures. Therefore, prolonged exposure of sensitive receptors to substantial pollutant concentrations is not anticipated and would result in a *less than significant impact*.

CRITERIA POLLUTANT HEALTH RISKS

All criteria air pollutants can have human health effects at certain concentrations. Air Districts develop region-specific CEQA thresholds of significance in consideration of existing air quality

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

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

HEALTH EFFECTS SCREENING

To estimate the potential health risks that could result from the operational emissions of ROG, NO_x, 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* (Sacramento Metropolitan AQMD, 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 lbs/day for ROG and NO_x, and 656 lbs/day under the 8xTOS for ROG and NO_x (Sacramento Metropolitan AQMD, 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" (Sacramento Metropolitan AQMD, 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” (Sacramento Metropolitan AQMD, 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-4 and Table IS-5.

Table IS-4: 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	0.66	0.58	0.0032%	18,419
Hospital Admissions, Asthma	0 - 64	0.043	0.038	0.0021%	1,846
Hospital Admissions, All Respiratory	65 - 99	0.21	0.18	0.0093%	19,644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less	65 - 99	0.11	0.010	0.00042%	24,037

Myocardial Infarctions)					
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000053	0.000046	0.0012%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0048	0.0044	0.0014%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.012	0.011	0.0015%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.020	0.018	0.0015%	1,239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.071	0.064	0.0013%	5,052
Mortality					
Mortality, All Cause	30 - 99	1.3	1.1	0.0025%	44,766
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-5: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.043	0.031	0.00016%	19,644
Emergency Room Visits, Asthma	0 - 17	0.18	0.14	0.0023%	5,859
Emergency Room Visits, Asthma	18 - 99	0.29	0.22	0.0018%	12,560
Mortality					
Mortality, Non-Accidental	0 - 99	0.026	0.020	0.000067%	30,386
Notes:					
<ol style="list-style-type: none"> Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region. 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. 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. 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" (Sacramento Metropolitan AQMD, 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” (Sacramento Metropolitan AQMD, 2020).

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

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

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

Less than significant. The predominant source of power for construction equipment is diesel engines. Exhaust odors from diesel engines and emissions associated with the application of architectural coatings may be considered offensive to some individuals. However, the project would not introduce a substantial level of new diesel-powered equipment or architectural coating activity. Taking into consideration the fact that odors would be temporary and disperse rapidly with distance from the source, construction-generated odors would not result in the frequent exposure of receptors to objectionable odor emissions. Furthermore, the project would be required to comply with SMAQMD’s Rule 402 (Nuisance), which place general limitations on odorous substances and nuisances. This regulation would ensure that odors generated by short-term construction would not affect a substantial number of people. Therefore, this impact would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

The following mitigation measure would be implemented during construction of the project to reduce potential impacts related to air quality.

AQ-1: AIR QUALITY BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

The following Basic Construction Emissions Control Practices are considered feasible for controlling fugitive dust from a construction site. The practices also serve as best management practices (BMPs), allowing the use of the non-zero particulate matter significance thresholds.

Control of fugitive dust is required by District Rule 403 and enforced by District staff.

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

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

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

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic.

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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 in a developed, urban area of unincorporated Sacramento County and the site does not contain sensitive natural communities. Vegetation onsite consists of ornamental grasses and small, landscaping trees along the perimeter of the site in required landscaped areas. Many of these landscaped areas are in the parking lot or along public right of way along Elkhorn Boulevard and Hillsdale Boulevard. The large open area on-site consists of turf or lawn grass with several trees either along the perimeter of the remnant baseball diamond or along the perimeter of the open field. Approximately 68 trees are located on the subject property, including four (4) native trees. Many of the trees on site are ornamental landscape trees. The surrounding area consists of single-family residential and multi-family residential development.

REGULATORY SETTING

FEDERAL REGULATIONS

FEDERAL ENDANGERED SPECIES ACT

The Federal Endangered Species Act (FESA) of 1973 protects species that are federally listed as endangered or threatened with extinction. FESA prohibits the unauthorized “take” of listed wildlife species. Take includes harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such activities. Harm includes significant modifications or degradations of habitats that may cause death or injury to protected species by impairing their behavioral patterns. Harassment includes disruption of normal behavior patterns that may result in injury to or mortality of protected species. Civil or criminal penalties can be levied against persons convicted of unauthorized “take.” In addition, FESA prohibits malicious damage or destruction of listed plant species on federal lands or in association with federal actions, and the removal, cutting, digging up, damage, or destruction of listed plant species in violation of state law. FESA does not afford any protections to federally listed plant species that are not also included on a state endangered species list on private lands with no associated federal action.

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

Sacramento County has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12 of the County Code) provides protections for landmark trees and heritage trees. The County Code defines a landmark tree as “an especially prominent or stately tree on any land in Sacramento County, including privately owned land” and a heritage tree as “native oak trees that are at or over 19” diameter at breast height (dbh).” Chapter 19.12 of the County Code, titled Tree Preservation and Protection, defines native oak trees as valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*) and states that “it shall be the policy of the County to preserve all trees possible through its development review process.” It should be noted that to be considered a tree, as opposed to a seedling or sapling, the tree must have a dbh of at least six (6) inches or, if it has multiple trunks of less than six (6) inches each, a combined dbh of 10 inches. The Sacramento County General Plan Conservation Element policies CO-138 and CO-139 also provide protections for native trees:

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 six (6) inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.

CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

The Conservation Element also contains several policies aimed at preserving tree 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 acreage shall be calculated using the 15-year shade cover values for tree species.

CO-146. If new tree canopy cannot be created onsite to mitigate for the non-native 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.

CO-149. Trees planted within new or existing parking lots should utilize pervious cement and structured soils in a radius from the base of the tree necessary to maximize water infiltration sufficient to sustain the tree at full growth.

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. The list includes more than seventy trees, so is not included here, but it is available at <http://www.planning.saccounty.net/> under the "Environmental Documents CEQA/NEPA Overview" heading. Policy CO-146 references the Greenprint program, which is run by the Sacramento Tree Foundation and has a goal of planting five (5) million trees in the Sacramento region.

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?*

Less than significant with mitigation. The project site is in a developed, urban area of unincorporated Sacramento County and does not contain any sensitive natural communities. According to the California Natural Diversity Database (CNDDDB), maintained by the California Department of Fish and Wildlife, no special status species occurrences are on-site or in the vicinity of the subject property. The nearest occurrence noted in the CNDDDB of a special status species, California fairy shrimp, is located approximately 2.5 miles east of the project site. However, the project site contains a 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 and migratory birds 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?*

No impact. The project is located in an urban area of unincorporated Sacramento County. The site does not contain any sensitive natural communities or riparian habitat, nor do those habitat types exist nearby. The project would not 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 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?*

No impact. The project does not contain any state or federally protected wetlands; therefore, the project would not have a substantial adverse effect on 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?*

Less than significant with mitigation. The project site is surrounded by development, 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 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 for migratory bird and raptor nests this impact would not be significant; therefore, impacts associated with wildlife movement would be **less than significant with mitigation**.

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

Less than significant with mitigation. An arborist report was prepared for the project which identified 68 trees on the subject property including four (4) native trees. The majority of the trees on-site are ornamental landscape trees associated with the existing development, however, there are four native trees, two blue oaks (*Quercus douglasii*) and two Fremont cottonwoods (*Populus fremontii*), on the project site that will be removed to accommodate the proposed project. Table IS-6 shows the native tree species, diameter, condition, and mitigation owed for their removal. Removal of native trees requires equivalent compensatory plantings.

Table IS-6: Native Tree Species Present Onsite

Arborist Number	Tree Species	Diameter at breast height in inches (dbh)	Condition	Mitigation
#36	blue oak	5" (dbh)	Fair-good	None; less than 6" (dbh)
#37	Fremont cottonwood	7" (dbh)	Fair-good	7" (dbh)
#38	Fremont cottonwood	18" (dbh)	Fair-good	18" (dbh)
#56	blue oak	9" (dbh)	Poor; main trunk dead	None; poor condition

As shown in Table IS-6, removal of trees #36 and #56 would not require replacement plantings as tree #36 is less than 6 inches (dbh) and tree #56 is in poor condition. However, the removal of the two Fremont cottonwoods (tree #s 37 & 38) would require mitigation as set forth in mitigation Measure BIO-3. The mitigation measure requires 25 inches of equivalent replacement plantings to account for native tree removals.

Impacts resulting from native tree species removal would be ***less than significant with mitigation***.

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

Less than significant with mitigation. There are 64 non-native trees located onsite, the majority of which are ornamental landscape trees. According to the proposed site plan, it appears most if not all of the existing trees will be removed to accommodate the proposed development. However, the proposed landscaping plans show many of the existing trees being replaced by other tree species. County General Plan Policy CO-145 would require the developer/project proponent to plant new tree canopy equivalent to the area (square feet) removed, using 15-year shade values. The total tree canopy was calculated using the dripline radii provided in the arborist report (Appendix B) prepared by Tree Associates, Inc. The total non-native canopy area to be removed is approximately 51,170 square feet. In addition to the on-site trees to be removed, off site trees will also be removed to accommodate required median improvements within Elkhorn boulevard, as discussed in the Transportation section below. The median improvements will require the removal of three additional non-native trees with a canopy area of approximately 942 square feet. The total non-native tree canopy area to be removed for the project is 52,112 square feet.

The project site is located within the North Highlands community, which is one of four designated Environmental Justice communities within the General Plan. Pursuant to the Implementation Measure for Policy EJ-23, an extra 25-percent tree canopy replacement would be required within the same EJ community impacted. This would bring the total, replacement canopy area to 65,140 square feet. The proposed landscaping plans show approximately 76,491 square feet of proposed replacement canopy, which is greater than the 65,140 required under Policies CO-1145 & EJ-23 and the proposed planting appear to be adequate. However, mitigation (Measure BIO-4) requiring the replacement of non-native tree canopy consistent with General Plan Policies is recommended to ensure impacts are less than significant. Preference is given to onsite plantings, but other opportunity sites such as parks and schools within the North Highlands community could satisfy planting requirements if the site could not accommodate the total canopy area required. Impacts related to the removal of non-native trees are ***less than significant with mitigation***.

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?

No impact. The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, nor other approved local, regional, or state habitat conservation plan; therefore, there would be no conflict with the provisions of any of those plan types— No other public agency approvals are anticipated – ***no impact***.
Environmental Mitigation Measures

ENVIRONMENTAL MITIGATION MEASURES

The following mitigation measures would be implemented during construction of the project to reduce potential impacts related to biological resources.

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 September 15, a survey for active migratory bird nests shall be conducted no more than 7 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 September, 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.

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 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 trees totaling 25 inches dbh (tree #s 37 & 38) shall be compensated for by planting in-kind native trees equivalent 25 inches dbh, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. Native trees include: valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*, which is also a List 1B plant), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. A total of 25 inches will require compensation.

Equivalent compensation based on the following ratio is required:

- 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
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.

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.

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: NON-NATIVE TREE CANOPY REPLACEMENT

Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the square footage of the non-native tree canopy removed. Pursuant to the Implementation Measure for Policy EJ-23, an extra 25 percent of tree canopy replacement would be required to be planted within the same EJ community. The removal of up to 67 trees, including three (3) small non-native landscaping trees within the Elkhorn Boulevard median, would require 65,140 square feet of replacement canopy. The new tree canopy area shall be

calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

A Cultural Resources Report was prepared for the project by Analytical Environmental Services (AES) dated June 27, 2018. The report includes a North Central Information Center (NCIC) search (NCIC File No.: SAC-18-123) for the project site and a 0.5-mile buffer zone. The records search and literature review were done to: (1) determine whether known cultural resources had been recorded within or adjacent to the study area and to determine if the parcel was subject to surveys in the past; (2) assess the likelihood of unrecorded cultural resources based on archaeological, ethnographic, and historical documents and literature; and (3) to review the distribution of nearby archaeological sites in relation to their environmental setting. This record search included, but was not necessarily restricted, to a review of the following sources: National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, California Inventory of Historic Resources, the Historic Properties directory, and historic mapping. No cultural resources were identified within the project site, and only one has been recorded within 0.5 miles, site P-34-505, the Union Pacific Railroad, which is located approximately 0.25 miles northwest of the project site.

The NCIC record search noted that one previous archaeological survey has included part of the project site, and nine surveys have been completed within 0.5 miles.

IMPACT DISCUSSION

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

No impact. As stated in the environmental setting above, the only historical resource identified in the NCIC record search is located 0.25 miles northwest of the site and would not be impacted by the proposed project. Additionally, no cultural resources were identified during pedestrian survey efforts or in the AES cultural report; therefore, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 – **no impact.**

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

Less than significant with mitigation. The NCIC records search conducted as part of the cultural resources report prepared by AES, did not yield pre-contact cultural resources in the project parcel. However, although the likelihood of an archaeological resource discovery is low, there is a potential for the discovery of archaeological resources whenever there is ground disturbance. Mitigation measure CR-1 is recommended in the event unanticipated discoveries are encountered. Project related impacts to archaeological resources will be *less than significant with mitigation*.

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

Less than significant with mitigation. There are no known human remains or cemeteries located within or in the immediate vicinity of the project area. Although the inadvertent discovery of human remains is unlikely, the possibility cannot be ruled out. Therefore, construction of the project would implement Mitigation Measure CR--2, Unanticipated Discovery of Human Remains, and impacts related to disturbance of human remains would be *less than significant with mitigation*.

ENVIRONMENTAL MITIGATION MEASURES

The following mitigation measure would be implemented during construction of the project to reduce potential impacts related to cultural resources.

CR-1: UNANTICIPATED DISCOVERY OF CULTURAL RESOURCES

If previously unknown cultural resources are discovered during earthmoving activities, immediately cease work in the vicinity of the find and notify the Sacramento County Department of Planning and Environmental Review. A retained qualified archaeologist will be consulted to determine whether the resource requires further study. The archeologist will 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 Public Resources Code 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 will 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, Public Resources Code 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 will be taken:

1. There will 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 Public Resources Code Section 5097.98, or
2. Where the following conditions occur, the landowner or his/her authorized representative will rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendent or on the project area in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission;
 - The descendent identified fails to make a recommendation; or
 - The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

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 Sacramento Municipal Utility District (SMUD) is the primary provider of electric service in the area. Pacific Gas and Electric Company (PG&E) provides natural gas to all customers in the community.

Energy use during construction is temporary and typically includes the consumption of fossil fuels, electricity, and natural gas for the operation of construction equipment and vehicles. Operational energy use would be primarily related to electricity but would also utilize fossil fuels for landscaping/maintenance equipment and vehicle trips.

REGULATORY SETTING

The California Building Standards Code, Title 24, applies to all building occupancies, and related features and equipment, throughout California. The California Green Building Standards Code (CALGreen Code) is a subsection of Title 24 which mandates green building standard code for all buildings within the State.

Section 2449 of the California Code of Regulations, Title 13, Chapter 9, Article 4.8 requires minimizing non-essential idling of construction equipment during construction. This requirement applies to all construction activities.

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?*

SHORT-TERM CONSTRUCTION

Less than significant. The use of energy resources by construction equipment and vehicles would fluctuate according to the phase of construction and would be temporary. Upon completion of the project, all construction activities would cease. Contractors would comply with Section 2449 of the California Code of Regulations, Title 13, Chapter 9, Article 4.8, which requires minimizing non-essential idling of construction equipment during construction. Compliance with Section 2449 would limit wasteful and unnecessary energy consumption. Construction would require the use of nonrenewable construction material, such as concrete, metals, and plastics. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation, and construction of the project facility itself. The scope of construction activities is minimal with removal activities occurring in short periods. Large amounts of energy would not be expended, and all construction vehicles would comply with federal and State standards for on- and off-road vehicles (e.g., emission standards set by the California Air Resources Board [CARB]), meaning wasteful usage of energy would not occur. Therefore, construction-related impacts would be *less than significant*.

OPERATIONAL ELECTRICITY

Less than significant. Sacramento Metropolitan Utility District (SMUD) provides electric service to the project area. According to Appendix A: Air Quality and Greenhouse Gas Emissions Assessment, the proposed project is expected to use 1,999,475 Kilowatt-hour per year (KWh/year). According to the California Energy Commission's California Energy Demand 2018-2030 Revised Forecast, Figure 59 Historical and Projected Baseline Consumption, Northern California Non-California ISO (NCNC) Planning Area, the total electricity demand in NCNC's service area is forecast to increase by approximately 5,000 gigawatt hours (GWh) – or five (5) billion kWh – between 2018 and 2030. The increase in electricity demand from the proposed project would represent an insignificant percent increase compared to overall demand in NCNC's service area. Additionally, while the project will introduce new commercial development which will result in energy consumption, compliance with Title 24, CALGreen Code, will ensure that all project energy efficiency requirements are met. Therefore, operational 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?

Less than significant. Project implementation would not cause inefficient wasteful and unnecessary energy consumption, and no adverse impact would occur. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Executive Order (EO) S-14-08, signed in November 2008, expanded the State's renewable portfolios standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). SB 350 increased the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

The project would be required by law to comply with enhanced building/utilities energy efficiencies mandated under the CBC (e.g., Title 24, the California Green Building Code). Therefore, the proposed project would not conflict with any State or local plans for renewable energy or energy efficiency. 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

REGIONAL GEOLOGY

The project area lies within the Great Valley geomorphic province of California (the Great Valley), which is a gently sloping 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).

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 42 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 32 miles southwest and the Bear Mountain Fault Zone is approximately 24 miles east of the project area. The closest active fault to the project area is the Dunnigan Hills Fault, approximately 28 miles northwest.

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 (Branum, Chen, Petersen, & Wills, 2016).

LIQUEFACTION AND LANDSLIDES

According to the seismic hazards identified by the California Geological Survey, the project area is not within an area designated as a liquefaction or landslide hazard (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-Xerarents-Fiddymnt complex with, 0-8 percent slopes (Appendix C).

Table IS-7: Site Soil Types and Characteristics

Soil Name	Slope Class	Soil Depth	Drainage	Erosion Potential	Linear Extensibility¹
Urban Land ²	N/A	N/A	N/A	N/A	N/A
Urban Land-Xerarents-Fiddymnt complex	0-8 percent	Impervious to moderately deep	Impervious to well drained	Slight	Low

Source: Custom Soil Resource Report for Sacramento County, California; Liberty Towers Project (Natural Resources Conservation Service, 2025)

Notes:

¹ Linear extensibility is used to determine the shrink-swell potential of soils.

² Urban Land soil type includes artificial fill and/or impervious surface areas.

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 institutional land uses and existing roadways. Therefore, the near surface deposits are likely comprised of Holocene-age artificial fill material. Based on the geologic mapping, the artificial fill is underlain by deposits of Pleistocene-age Turlock Lake Formation, with sediments deposited approximately 130,000-450,000 years before present (B.P.). Pleistocene-age deposits have been known to contain paleontological resources.

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.*

No Impact. 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 42 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?

Less than significant. The closest active fault to the project area is the Dunnigan Hills Fault, approximately 28 miles to the west. 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 indicates the project area has a lower probability of shaking hazard intensities. Therefore, this would be a **less than significant** impact.

iii. Seismic-related ground failure, including liquefaction?

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

iv. Landslides?

No Impact. The project area is relatively flat, with existing roads and surrounding residential and commercial infrastructure. Additionally, the California Department of Conservation's Earthquake Hazards Zone Application indicates that the project area is not located in a landslide hazard zone (California Department of Conservation, 2022). Therefore, there would be **no impact**.

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

Less than significant. 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 County's Land Grading and Erosion Control Ordinance (Municipal Code Chapter 16.44). 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 would have a **less than significant** impact.

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?

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

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?*

No Impact. The soil types within the project area have low linear extensibility ratings; 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?*

No Impact. The project would utilize existing public sewer facilities- *no impact*.

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

Less than significant with mitigation. The project area is composed of artificial fill underlain by Pleistocene-age sediments of the Turlock Lake Formation. Pleistocene or older (older than 11,000 years) continental sedimentary deposits are considered to have high paleontological potential. During construction of the project, unknown paleontological resources could potentially be encountered, particularly during ground-disturbing activities. Therefore, Mitigation Measure GEO-1, which would require work to stop in case of inadvertent discovery, would be implemented and impacts related to paleontological resources would be *less than significant with mitigation*.

ENVIRONMENTAL MITIGATION MEASURES

The following mitigation measure would be implemented during construction of the project to reduce potential impacts related to geology and soils.

GEO-1: INADVERTENT DISCOVERY OF PALEONTOLOGICAL RESOURCES

If paleontological resources are discovered during earthmoving activities, immediately cease work in the vicinity of the find and notify the Sacramento County Department of Planning and Environmental Review. Retain a qualified paleontologist to evaluate the resource and prepare a recovery plan based on Society of Vertebrate Paleontology Guidelines (SVP 2010). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary and feasible will be implemented before construction activities can resume at the site where the paleontological resources were discovered.

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 type="checkbox"/>	<input checked="" type="checkbox"/>
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ENVIRONMENTAL SETTING

GREENHOUSE GAS BACKGROUND

Certain gases in Earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by Earth's surface, and a smaller portion of this radiation is reflected toward space through the atmosphere. Infrared radiation is selectively absorbed by GHGs. As a result, infrared radiation released from Earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on Earth.

GHGs are present in the atmosphere naturally; are released by natural sources and anthropogenic sources (e.g., human-caused); and are formed from secondary reactions taking place in the atmosphere. Natural sources of GHGs include the respiration of humans, animals, and plants; decomposition of organic matter; volcanic activity; and evaporation from the oceans. Anthropogenic sources include the combustion of fossil fuels by stationary and mobile sources, waste treatment, and agricultural processes. Anthropogenic sources lead to atmospheric levels of GHGs in excess of natural ambient concentrations and have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change.

The following are GHGs that are widely accepted as the principal contributors to human-induced global climate change that are relevant to the project:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Fluorinated gases such as chlorofluorocarbons (CFCs), perfluorinated chemicals (PFCs), sulfur hexafluoride (SF₆), hydrochlorofluorocarbons (HCFCs), and hydrofluorocarbons (HFCs).

Emissions of CO₂ are byproducts of fossil fuel combustion. CH₄ is the main component of natural gas and is associated with agricultural practices and landfills. N₂O is a colorless GHG that results from industrial processes, vehicle emissions, and agricultural practices.

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is based on several factors, including the relative effectiveness of gas to absorb infrared radiation and the length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The reference gas for GWP is CO₂; therefore, CO₂ has a GWP of 1. The other main GHGs that have been attributed to human activity include CH₄, which has a GWP of 28, and N₂O, which has a GWP of 265 (IPCC 2014). For example, 1 ton of CH₄ has the same contribution to the greenhouse effect as approximately 28 tons of CO₂. GHGs with lower emission rates than CO₂ still may contribute to

climate change because they are more effective at absorbing outgoing infrared radiation than CO₂ (i.e., high GWP).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms. GHGs typically persist in the atmosphere for extensive periods of time, long enough to be dispersed throughout the globe and result in long-term global impacts. As such, a project may not, by itself, contribute significantly to climate change; however, cumulative emissions from many projects and plans all contribute to global GHG concentrations and the climate system.

REGULATORY BACKGROUND

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

In November of 2011, Sacramento County approved the Phase 1 Climate Action Plan Strategy and Framework document (Phase 1 CAP), which is the first phase of developing a community-level Climate Action Plan. The Phase 1 CAP provides a framework and overall policy strategy for reducing greenhouse gas emissions and managing our resources in order to comply with AB 32. It also highlights actions already taken to become more efficient, and targets future mitigation and adaptation strategies. This document is available at http://www.green.saccounty.net/Documents/sac_030843.pdf. The CAP contains policies/goals related to agriculture, energy, transportation/land use, waste, and water.

Goals in the section on agriculture focus on promoting the consumption of locally-grown produce, protection of local farmlands, educating the community about the intersection of agriculture and climate change, educating the community about the importance of open space, pursuing sequestration opportunities, and promoting water conservation in agriculture. Actions related to these goals cover topics related to urban forest management, water conservation programs, open space planning, and sustainable agriculture programs.

Goals in the section on energy focus on increasing energy efficiency and increasing the usage of renewable sources. Actions include implementing green building ordinances and programs, community outreach, renewable energy policies, and partnerships with local energy producers.

Goals in the section on transportation/land use cover a wide range of topics but are principally related to reductions in vehicle miles traveled, usage of alternative fuel types, and increases in vehicle efficiency. Actions include programs to increase the efficiency of the County vehicle fleet, and an emphasis on mixed use and higher density development, implementation of technologies and planning strategies that improve non-vehicular mobility.

Goals in the section on waste include reductions in waste generation, maximizing waste diversion, and reducing methane emissions at Kiefer landfill. Actions include solid waste reduction and recycling programs, a regional composting facility, changes in the waste vehicle fleet to use non-petroleum fuels, carbon sequestration at the landfill, and methane capture at the landfill.

Goals in the section on water include reducing water consumption, emphasizing water efficiency, reducing uncertainties in water supply by increasing the flexibility of the water allocation/distribution system, and emphasizing the importance of floodplain and open space protection as a means of providing groundwater recharge. Actions include metering, water recycling programs, water use efficiency policy, water efficiency audits, greywater programs/policies, river-friendly landscape demonstration gardens, participation in the water forum, and many other related measures.

The Phase 1 CAP is a strategy and framework document. The County adopted the Phase 2A CAP (Government Operations) on September 11, 2012. Neither the Phase 1 CAP nor the Phase 2A CAP are “qualified” plans through which subsequent projects may receive CEQA streamlining benefits. The Communitywide CAP (Phase 2B) has been in progress for some time (<https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx>) but was placed on hold in late 2018 pending in-depth review of CAP-related litigation in other jurisdictions.

The commitment to a Communitywide CAP is identified in General Plan Policy LU-115 and associated Implementation Measures F through J on page 117 of the General Plan Land Use Element. This commitment was made in part due to the County’s General Plan Update process and potential expansion of the Urban Policy Area to accommodate new growth areas. General Plan Policies LU-119 and LU-120 were developed with SACOG to be consistent with smart growth policies in the SACOG Blueprint, which are intended to reduce VMT and GHG emissions. This second phase CAP is intended to flesh out the strategies involved in the strategy and framework CAP, and will include economic analysis, intensive vetting with all internal departments, community outreach/information sharing, timelines, and detailed performance measures.

The Phase 2B CAP was re-initiated in early 2020. In March of 2021, the draft Phase 2B CAP was released by the County for public review. Based on comments received, Sacramento County revised the CAP and prepared a Subsequent Environmental Impact Report (SEIR) analyzing the potential impacts of the revised CAP. The draft SEIR was distributed for public review on July 15, 2024. The CAP was approved by the Board of Supervisors on November 6, 2024.

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 to use 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. SMAQMD’s technical support document, “Greenhouse Gas Thresholds for Sacramento County”, identifies operational measures that should be applied to a project to demonstrate consistency.

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

Projects that implement BMP 1 and BMP 2 can utilize the screening criteria for operation emissions outlined in Table IS-8. Projects that do not exceed 1,100 metric tons per year are then screened out of further requirements. 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.

SMAQMD’s GHG construction and operational emissions thresholds for Sacramento County are shown in Table IS-8.

Table IS-8: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	10,000 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

Less than significant with mitigation. CalEEMod was used to estimate GHG emissions associated with construction of the project. Table IS-9 shows the project's annual metric tons (MT) of CO₂e for construction, assuming the same compact 1.5-year construction schedule described in the Air Quality discussion.

Table IS-9: Construction Emissions

Year	Emissions (MT CO ₂ e per year)
2023	440.4
2024	670.4
SMAQMD Threshold	1,100
Threshold Exceeded?	No
Source: (HELIX Environmental Planning Inc., 2022)	

As shown in Table IS-9, the project would not exceed SMAQMD's annual threshold of 1,100 MT of CO₂e, even when using the conservative 1.5-year construction schedule with incorporation of Mitigation Measure AQ-1, Air Quality Basic Construction Emissions Practices. Therefore, construction-related GHG impacts are considered *less than significant with mitigation*.

OPERATIONAL PHASE GREENHOUSE GAS EMISSIONS

Less than significant with mitigation. The project will implement BMP 1 and BMP 2 in its entirety. As such, the project can be compared to the operational screening table. CalEEMod was used to calculate anticipated annual emissions for the project. Annual CO₂e were estimated to be 968 MT per year, which is below the established annual threshold of 1,100 MT of CO₂e. The project will use natural gas for the outdoor fire pit area, with emissions quantified as 1.27 MT per year. According to the Air Quality/GHG Emissions Assessment (Appendix A), GHG emissions from natural gas will be offset with the installation of solar panels totaling a minimum of 5 kilowatts capacity beyond the solar power generation required by Title 24 or any other applicable regulation. Mitigation has been included such that the project will implement BMP 1 and BMP 2 and install a minimum of 5 kilowatts capacity on-site solar panels to offset GHG Emissions for the operation of the fire pit. 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?

No impact. The project is not inconsistent with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases as construction and operation of the project fall under the threshold of significance identified by SMAQMD. Therefore, there would be *no impact*.

ENVIRONMENTAL MITIGATION MEASURES

The following mitigation measure would be implemented to reduce potential impacts related to greenhouse gas emissions.

GHG-1: GHG Reductions: Tier 1 Best Management Practices

The project is required to incorporate the Tier 1 Best Management Practices or propose alternatives that demonstrate the same level of GHG reductions as BMPs 1 and 2, listed below. At a minimum, the project must mitigate natural gas emissions and provide necessary wiring for an all-electric retrofit to accommodate future installation of (e.g., electric space heating, water heating, drying, and cooking appliances).

1. Tier 1: Best Management Practices (BMP) Required for all Projects

- 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 be 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. This includes the on-site installation of photovoltaic panels (solar panels) totaling a minimum of 5 kilowatts capacity as recommended in the Air Quality/GHG Emissions Assessment (Appendix A, page 17) to offset operational emissions from the project’s outdoor fire pit.

If natural gas is utilized for project implementation, alternative onsite or offsite measures shall be incorporated to offset the use of the equivalent of MT CO₂e per year from the use of natural gas. If calculations of actual natural gas consumption from the project, prepared by a qualified expert and submitted to the County for verification, demonstrate that the use of natural gas will emit fewer MT of CO₂e per year, mitigation will be required only to offset the use of the calculated and verified emissions.

If the project proponent opts to pay fees for the retirement of carbon offsets to mitigate for the use of natural gas, then credits retired shall offset a minimum of the equivalent of MT CO₂e per year from the use of natural gas (based on project modeling disclosed within this analysis – 1.2387 MT CO₂e per year from the use of natural gas over the typical 30-year lifespan of the facility). Additionally, the following shall apply:

Payments shall be made in the full amount to offset 30 years of natural gas use (as described above) prior to the issuance of the building permit; or

At the discretion of the County, periodic payments may be made, provided the quantities of carbon offsets retired, and the payment periods are specified in a contract entered into between the project proponent, the County, and a County-approved carbon offset program or broker. Periodic payments shall continue for 30 years commencing with issuance of the building permit,

or until the project Applicant submits updated plans to the County that verify all natural gas appliances have been removed from the building or natural gas supply has been terminated.

Carbon offset retirement shall be accomplished through an accredited carbon offset program approved by the County. Prior to the issuance of any building permit that includes the use of natural gas, the project proponent shall provide evidence to the County that carbon offsets in the amounts discussed above have been retired. Such evidence must comply with the requirements described under *Reporting and Enforcement Standards* below.

Carbon Offset Standards – Eligible Registries, Acceptable Protocols, and Defined Terms

“Carbon offset” shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the Climate Action Reserve, the American Carbon Registry, or Verra (previously, the Verified Carbon Standard). This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities. The project shall neither purchase offsets from the Clean Development Mechanism (CDM) registry nor purchase offsets generated under CDM protocols. Further, no carbon offsets shall originate from international areas, as discussed under Locational Performance Standards, below. Qualifying carbon offsets presented for compliance with this mitigation measure may be used provided that the evidence required by the Reporting and Enforcement Standards below is submitted to the County demonstrating that each registry shall continue its existing practice of requiring the following for the development and approval of protocols or methodologies:

1. Adherence to established GHG accounting principles set forth in the International Organization for Standardization 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development Greenhouse Gas Protocol for Project Accounting; and
2. Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:
 - a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;
 - b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;
 - c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and
 - d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries; as such manuals are updated from time to time. The current registry documentation includes the Climate Action Reserve’s Reserve Offset Program Manual (November 2019) and Climate Forward Program Manual (March 2020); the American Carbon Registry’s Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and Removals (July 2019); and

Verra's Verified Carbon (Standard, Program Guide and Methodology Requirements (September 2019).

The registry-administered protocols and methodologies for the carbon offset project types cited above – including updates to those protocols and methodologies as may occur from time to time by the registries in accordance with the registry documentation listed in the prior paragraph to ensure the continuing efficacy of the reduction activities – are eligible for use under this mitigation measure, provided that any updated protocols shall be provided for County review as required by Reporting and Enforcement Standards below prior to the County's acceptance of offsets based on such updated protocols.

Further, any carbon offset used to reduce the project's GHG emissions shall be a carbon offset that represents the past or forecasted reduction or sequestration of one metric ton of carbon dioxide equivalent that is "not otherwise required" (CEQA Guidelines §15126.4[c][3]). Each carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows:

1. Additional means that the carbon offset is not otherwise required by law or regulation, and not any other GHG emissions reduction that otherwise would occur.
2. Real means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage.
3. Verifiable means that the GHG reduction underlying the carbon offset is well documented, transparent, and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute.
4. Permanent means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction.
5. Quantifiable means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage.
6. Enforceable means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.

The protocols and methodologies cited previously establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions. Additionally, the Reporting and Enforcement Standards below ensure that the emissions reductions required by this mitigation measure are enforceable against the project applicant, as the County has authority to hold the project applicant accountable and to take appropriate corrective action if the County determines that any carbon offsets do not comply with the requirements set forth in this mitigation measure.

The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further

construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., CEQA Guidelines §15126.4[a], [c]), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the project (e.g., the Cap-and-Trade Program).

Locational Performance Standards

All carbon offsets required to reduce the project's GHG emissions shall originate from the following geographic locations (in order of priority): (1) off-site, unincorporated areas of the County of Sacramento; (2) off-site, incorporated areas of the County of Sacramento; (3) off-site areas within the State of California; and (4) off-site areas within the United States. No carbon offsets shall originate from off-site, international areas. As listed, geographic priorities would focus first on local reduction options to ensure that reduction efforts achieved locally would provide cross-over, co-benefits to other environmental resource areas.

For purposes of implementing this mitigation measure, the County shall require the carbon offsets to adhere to the following locational performance standards in order to reduce the project's operational GHG emissions:

1. The project shall use all feasible available carbon offsets within the County of Sacramento (the first priority is within unincorporated areas of the County and the second priority is within incorporated areas of the County). "Available," for purposes of this subdivision, means that the project applicant provides objective, verifiable evidence to the County documenting that such carbon offsets are available for retirement from carbon offset projects within the subject geography no later than at the time of application for grading permit issuance. The objective, verifiable evidence to be provided includes a market survey report that shall comply with the following content requirements:
 - a. Identification of the carbon registry listings reviewed for carbon offset availability, including the related date of inquiry; and
 - b. Identification of the geographic attributes of carbon offsets that are offered for sale and available for retirement.
2. In the event that a sufficient quantity of carbon offsets is not "available" in the County of Sacramento, the project shall obtain the remaining carbon offsets needed from within the State of California (third priority). For the definition of "available," see subdivision (1) immediately above.
3. In the event that a sufficient quantity of carbon offsets is not "available" in the County of Sacramento or State of California, the project shall obtain the remaining carbon offsets needed from within the United States (fourth priority). For the definition of "available," see subdivision (1) immediately above.

Reporting and Enforcement Standards

Over the course of build out of the project and prior to issuance of requested building permits, the project applicant shall submit reports to the County that identify the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the reports shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-

party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offsets to be retired, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and (iv) the locational attributes of the carbon offsets. The reports also shall append the market survey report described in the Locational Performance Standards provision above.

If the County determines the project’s carbon offsets do meet the requirements of this mitigation measure, the offsets can be used to reduce project GHG emissions and project permits shall be issued. If the County determines the project’s carbon offsets do not meet the requirements of this mitigation measure, the offsets cannot be used to reduce project GHG emissions and project permits shall not be issued. Additionally, the County may issue a notice of non-consistency and cease permitting activities in the event the County determines the carbon offsets provided to reduce project GHG emissions are not compliant with the aforementioned standards. In the event of such an occurrence, project permitting activities shall not resume until the project applicant has demonstrated that the previously provided carbon offsets are compliant with the standards herein or has provided substitute carbon offsets achieving the standards of this mitigation measure in the quantity needed to achieve the required emission reduction.

The County is currently in the process of preparing a Climate Action Plan (CAP). If and when the County adopts a qualified CAP, in lieu of the measures above, 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is in a developed, urban area of the North Highlands community in unincorporated Sacramento County. With the exception of the Union Pacific Railway, the area remained undeveloped until the early 1960s when single-family residential suburbs were built to the west and south of the site. The community is nearly fully developed by the mid-1980s with primarily single-family homes, a multi-family apartment complex and some commercial development to the east across Elkhorn Boulevard. The neighboring church first appears in 1985 and the auditorium on the project site in 2001.

A review of publicly available databases was conducted for the project to determine if any known hazardous waste sites are within the project area. The databases included EnviroStor (Department of Toxic Substances Control, 2025) maintained by the California Department of Toxic Substances Control (DTSC) and GeoTracker maintained by the State Water Resources Control Board (SWRCB) (State Water Resources Control Board, 2025). Additionally, a search of the U.S. Environmental Protection Agency’s (EPA) National Priorities List (Superfund) database was completed (U.S. Environmental Protection Agency, 2025).

Based on the review of the above databases, there are no known hazardous waste sites within the project area. There are no records within a ¼ mile of the project site. The nearest records are two closed leaking underground storage tanks (LUSTs) approximately ½ mile to the west and southeast of the project site.

REGULATORY SETTING

The Hazardous Materials Division of the Sacramento County Environmental Management Department (EMD) has been designated by the California Environmental Protection Agency (CalEPA) as the Certified Unified Program Agency (CUPA) for Sacramento County. As the CUPA, the Environmental Compliance Division is responsible for the implementation of six (6) statewide environmental programs for Sacramento County, including underground storage of hazardous substances. Program implementation involves permitting and inspection of regulated facilities, providing educational guidance and notice of changing requirements stipulated in State or Federal laws and regulations, investigations of complaints regarding spills or unauthorized releases and administrative enforcement actions levied against facilities that have violated applicable laws and regulations. Fuel station operators are required to submit an application for permits to install, upgrade, repair, or remove underground storage tanks (USTs) to County EMD. The CUPA also coordinates with State and Federal agencies during the remediation process, when protective measures fail and a release occurs.

In the State of California, Section 65962.5 of the Government Code requires that the California Department of Toxic Substances Control (DTSC), the California Department of Public Health, and the State Water Resources Control Board (SWRCB) compile lists of all hazardous waste facilities subject to corrective action, sites included in the Abandoned Site Assessment Program, drinking water wells that contain detectable levels of organic contaminants, underground storage tanks with unauthorized releases, and solid waste disposal sites, cleanup sites, and the like. Locations of potential toxic substances and contamination in California are identified by the DTSC and the SWRCB. According to the DTSC and SWRCB databases, the project site is not identified as a hazardous materials cleanup site, nor are there any hazardous materials cleanup sites located adjacent to the project site.

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?*

Less than significant. Construction of the project would result in emissions from construction equipment and vehicles and would require the handling of construction-related hazardous materials and waste such as oil and lubricants. However, construction-related emissions and handling of construction-related hazardous materials and waste would be temporary and cease upon completion of project construction. All handling of hazardous materials and waste would be conducted in accordance with federal, state, and local regulations.

Operationally, residential housing, recreational, and institutional uses do not warrant the storage of large quantities of hazardous materials on-site. The project would likely use gasoline, oil, and lubricants for landscaping maintenance. However, with proper handling of hazardous materials as required by federal, state, and local regulations, impacts related to use or disposal of hazardous materials for construction activities and operations 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?*

Less than significant. Construction of the project would result in emissions from construction equipment and vehicles and would require the handling of construction-related hazardous materials and waste such as oil and lubricants. However, construction-related emissions and handling of construction-related hazardous materials and waste would be temporary and cease upon completion of project construction. Operationally, residential housing, recreational, and institutional uses do not warrant the storage of large quantities of hazardous materials on-site. A background search of hazard material databases indicated the project site has no known hazardous conditions (as discussed in *d.* below). All project construction and operational handling of hazardous materials and waste would be conducted in accordance with federal, state, and local regulations and will not cause reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts are ***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?*

Less than significant. Frontier Elementary School, Foothill High, and Westside Preparatory Charter (East Campus) are located approximately ¼ mile south and west of the project site,

respectively. Construction of the project would result in emissions from construction equipment and vehicles and would require the handling of construction-related hazardous materials and waste such as oil and lubricants within one-quarter mile. However, construction-related emissions and handling of construction-related hazardous materials and waste would be temporary and cease upon completion of project construction. The use of the site for residential housing, recreational, and institutional uses will not create hazardous conditions in close proximity to the schools. All handling of hazardous materials and waste would be conducted in accordance with federal, state, and local regulations. Impacts are ***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?

Less than significant. A review of publicly available databases was conducted for the project to determine if any known hazardous waste sites are within the project area. The databases included EnviroStor maintained by the California Department of Toxic Substances Control (DTSC (Department of Toxic Substances Control, 2024)) and GeoTracker maintained by the State Water Resources Control Board (SWRCB) (State Water Resources Control Board, 2024). Additionally, a search of the U.S. Environmental Protection Agency's (EPA) National Priorities List (Superfund) database was completed (U.S. Environmental Protection Agency, 2024). No hazardous waste sites were identified on-site or within the project area. Impacts are ***less than significant***.

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

Less than significant. During construction of the project the placement of curb, gutter, and sidewalks may result in temporary lane closures to allow for construction equipment movement and activities; however, these would be temporary and would not physically interfere with an emergency evacuation plan. Additionally, the project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Impacts related to interference with an emergency response or evacuation plan are ***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?

No Impact. Based on fire hazard maps published by the California Department of Forestry and Fire Protection (CalFire), the project site is not located within an identified State or Local fire hazard area. The proposed project would be constructed in accordance with fire codes established in the Uniform Building Code, California Building Code (CBC), and Sacramento Metropolitan Fire District laws, ordinances, regulations, and standards - ***no impact***.

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 type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING**SURFACE WATER****REGIONAL HYDROLOGY**

The project area is in the urbanized North Highlands area within the Sacramento River Basin. The Sacramento River Basin encompasses approximately 27,000 square miles and is bounded by the Sierra Nevada to the east, Coast Ranges to the west, Cascade Range and Trinity Mountains to the north, and the Delta to the southeast. The project area is situated within the

Lower Steelhead Creek and Arden Arcade watersheds (HUC 12-180201110302 and HUC 12-180201110303) drains southwesterly to the Sacramento River through primarily developed areas consisting of residential and commercial development.

A Level 3 Drainage Study was prepared for the project by TSD Engineering, Inc. dated April 14, 2023 (Appendix D). The drainage study was reviewed and approved by County Department of Water Resources (DWR) staff. Project conditions of approval were also prepared by DWR staff dated June 27, 2025. According to the study, the existing onsite storm drain system collects runoff from the developed portion of the site in drop inlets and conveys storm water toward Elkhorn Boulevard underground in pipes ranging from 6 to 10 inches in diameter. The existing onsite storm drain system discharges to a 15-inch public storm drain main located in Elkhorn Boulevard, which drains southeasterly towards Arcade Creek.

A portion of the undeveloped section of the site and the northbound lanes of Hillsdale Boulevard drain to a field inlet located on the east side of Hillsdale Boulevard. The remainder of the site drains south to inlets located in Andrea Drive.

FLOODING

According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, the project area is within Zone X an area with 0.2% chance flood hazard, or 1% chance flood hazard with depths less than one foot (Panel No. 06067C0078H and 86H). The project site is located within the Magpie Creek and Diablo Creek watersheds.

SURFACE WATER QUALITY

As required by the Porter-Cologne Water Quality Control Act, the Central Valley Regional Water Quality Control Board (RWQCB) has designated beneficial uses for water body segments in its jurisdiction (including the American River), along with water quality criteria necessary to protect these uses, as contained in the Sacramento and San Joaquin River Basin Plan (Central Valley RWQCB, 2019). Designated beneficial uses for the American River (from Folsom Dam to Sacramento River) consist of the following: municipal and domestic water supply, agricultural irrigation, industry service supply and hydroelectric power, water contact and non-contact recreation, warm and cold freshwater habitat, warm and cold migration and spawning habitat, and wildlife habitat (Central Valley RWQCB, 2019).

The federal Clean Water Act (CWA) Section 303(d) requires states to identify water bodies that do not meet, or are not expected to meet, water quality standards, these are also known as impaired water bodies. The CWA also requires states to develop total maximum daily loads (TMDLs) to improve the water quality of impaired water bodies. TMDLs are the quantities of pollutants that can be safely assimilated by a water body without violating water quality standards. TMDLs are developed for impaired water bodies to maintain beneficial uses as designated in the applicable Basin Plan, achieve water quality objectives, and reduce the potential for future water quality degradation.

Table IS-10 lists the impaired water bodies included in the State Water Resource Control Board's 303(d) list that could receive runoff from the project area.

Table IS-10: Section 303(d) List of Impaired Water Bodies

Impaired Water Body	Pollutant	Source	TMDL Status
Arcade Creek	Bifenthrin	Unknown	Expected completion 2035; not yet approved
	Copper	Unknown	Expected completion 2021; not yet approved
	Fipronil Sulfone	Unknown	Expected completion 2035; not yet approved
	Malathion	Unknown	Expected completion 2035; not yet approved
	Permethrin	Unknown	Expected completion unknown; approved 4/22/2019
	Pyrethroids	Unknown	Expected completion unknown; approved 4/22/2019
	Toxicity	Unknown	2021; not yet approved
American River, Lower (Nimbus Dam to confluence with Sacramento River)	Bifenthrin	Unknown	Expected completion 2027; not yet approved
	Indicator Bacteria	Unknown	Expected completion 2027; not yet approved
	Mercury	Unknown	Expected completion 2010; not yet approved
	PCBs (Polychlorinated biphenyls)	Unknown	Expected completion 2021; not yet approved
	Pyrethroids	Unknown	Expected completion 2027; not yet approved
	Temperature, water	Unknown	Expected completion 2034; not yet approved
	Toxicity	Unknown	Expected completion 2021; not yet approved
<p><i>Note:</i> TMDL – Total Maximum Daily Loads Data was obtained from the 2020-2022 Integrated Report; the 2024 Integrated Report has been adopted by the State Water Resources Control Board but has not yet been approved by the U.S. Environmental Protection Agency. Source: (State Water Resources Control Board, 2022)</p>			

GROUNDWATER**SUSTAINABLE GROUNDWATER MANAGEMENT**

The County is within the Sacramento Valley Groundwater Basin (Basin) which is underlain by an extensive alluvial aquifer system encompassing approximately 3,780,180 acres and divided into 18 subbasins (California Department of Water Resources, 2015). The project area is in the southern portion of the Sacramento Valley - North American Groundwater Subbasin (North American Subbasin), which underlies northern Sacramento, southern Sutter, and western Placer counties and encompasses approximately 342,000 acres (GEI Consultants, 2021).

A draft Groundwater Sustainability Plan for the North American Subbasin was prepared and submitted to the California Department of Water Resources (CA DWR) in January 2022 and approved in July 2023 (Department of Water Resources, 2023). As required by the Sustainable Groundwater Management Act (SGMA), the Groundwater Sustainability Plan includes a description of the setting, hydrogeological conceptual model, comprehensive water budget, basin-wide monitoring network, sustainable management criteria, and projects and management actions necessary to ensure sustainability of the subbasin. Modeling conducted for the Groundwater Sustainability Plan, including the projected conditions water budget scenario indicates there will be greater inflows than outflows in the North American Subbasin, resulting in an increase in groundwater storage over time. The Groundwater Sustainability Plan contains a description of specific projects and management actions that will be undertaken in the North American Subbasin to promote groundwater sustainability, including continued conjunctive use (i.e., a mix of groundwater and surface water) in urban areas, and continued water demand management throughout the subbasin.

GROUNDWATER QUALITY

Generally, the quality of groundwater in the North American Subbasin is suitable for nearly all uses, except for contamination plumes and localized, naturally occurring and human caused quality issues, which may affect the supply, beneficial uses, and potential management of groundwater in the subbasin if not properly managed. Total dissolved solids (TDS) and nitrate were identified as constituents that represent general conditions in the subbasin, with some wells displaying upward trends. Nitrate is below the drinking water standards for all wells in the subbasin. TDS exceeds the drinking water standards in some wells, predominantly in the western and eastern portions of the subbasin. Higher salinity concentrations are generally considered to be present due to natural sources.

REGULATORY SETTING

FEDERAL

CLEAN WATER ACT

The federal Clean Water Act and subsequent amendments, under the enforcement authority of the US Environmental Protection Agency (USEPA), was enacted “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The purpose of the act is to protect and maintain the quality and integrity of the nation’s waters by requiring states to develop and implement state water plans and policies. The Clean Water Act also sets water quality standards for surface waters and established the National Pollutant Discharge Elimination System (NPDES) program to protect water quality, such as under Section 402, which outlines the NPDES program, including Section 402(p), which governs stormwater permitting. The Clean Water Act authorizes the US EPA to implement pollution control programs such as setting wastewater standards for industry. In California, implementation and enforcement of the act is conducted through the California SWRCB and the nine (9) Regional Water Quality Control Boards (RWQCBs).

NPDES PERMIT

Section 402 of the Clean Water Act contains the NPDES permit system, which regulates municipal and industrial point discharges to surface waters of the U.S. Each NPDES permit for point discharges contains limits on allowable concentrations of pollutants contained in discharges.

The NPDES program also regulates non-point source (i.e., stormwater) pollutants in discharges. Stormwater sources are diffuse and originate over a wide area rather than from a definable point. The goal of NPDES stormwater regulations is to improve the quality of stormwater discharged to receiving waters to the “maximum extent practicable” using structural and non-structural best management practices (BMPs). BMPs can include the development and implementation of various practices including educational measures (workshops informing the public of the impacts of household chemicals being dumped into storm drains), regulatory measures (local authority of drainage facility design), public policy measures, and structural measures (e.g., silt fences, straw wattle, grass swales, and detention ponds). The NPDES permits that apply to the project include the Construction General Permit, as described further below.

STATE

PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Water Quality Control Act (Water Code Section 13000 et seq.) is the primary water quality control law in California. The Porter-Cologne Act established the SWRCB and divided the State into nine (9) regional basins, each overseen by a RWQCB. The nine (9) RWQCBs have the primary responsibility for the coordination and control of water quality within their respective jurisdictional boundaries. The Porter-Cologne Act requires the RWQCBs to establish water quality objectives while acknowledging that water quality may be changed to some degree without unreasonably affecting beneficial uses. Water quality objectives are limits or levels of water quality constituents or characteristics established for the purpose of protecting beneficial uses. Designated beneficial uses, together with the corresponding water quality objectives, also constitute water quality standards under the federal Clean Water Act. Therefore, the water quality objectives form the regulatory references for meeting State and federal requirements for water quality control. Designated beneficial uses for water bodies on the project site are described in the regional regulatory section (under Water Quality Control Plan [Basin Plan]).

NPDES CONSTRUCTION GENERAL PERMIT

Construction associated with projects that would disturb more than one (1) acre of land surface affecting the quality of stormwater discharges into waters of the U.S. are subject to the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ, NPDES No. CAS000002).

The Construction General Permit regulates discharges of pollutants in stormwater associated with construction activity to waters of the U.S. from construction sites that disturb one (1) acre or more of land surface, or that are part of a common plan of development or sale that disturbs more than one (1) acre of land surface. The permit regulates stormwater discharges associated with construction or demolition activities, such as clearing and excavation; construction of buildings; and linear underground projects, including installation of water pipelines and other utility lines.

The Construction General Permit requires that construction sites be assigned a Risk Level of One (low), Two (medium), or Three (high), based both on the sediment transport risk at the site and the receiving waters risk during periods of soil exposure (e.g., grading and site stabilization). The sediment risk level reflects the relative amount of sediment that could potentially be discharged to receiving water bodies and is based on the nature of the construction activities and the location of the site relative to receiving water bodies. The receiving waters risk level reflects the risk to the receiving waters from the sediment discharge.

Depending on the risk level, the construction projects could be subject to the following requirements:

- Effluent standards
- Good site management “housekeeping”
- Non-stormwater management
- Erosion and sediment controls
- Run-on and runoff controls
- Inspection, maintenance, and repair
- Monitoring and reporting requirements

The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which includes specific BMPs designed to prevent sediment and pollutants from contacting stormwater from moving off-site into receiving waters. The BMPs fall into several categories, including erosion control, sediment control, waste management and good housekeeping, and are intended to protect surface water quality by preventing the off-site migration of eroded soil and construction-related pollutants from the construction area. Routine inspection of all BMPs is required under the provisions of the Construction General Permit. In addition, the SWPPP is required to contain a visual monitoring program, a chemical monitoring program for non-visible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

LOCAL

SACRAMENTO COUNTY WATER QUALITY: EROSION AND GRADING

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

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one (1) 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.

IMPACT DISCUSSION

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

Less than significant. Construction of the project would disturb more than one acre of soil; therefore, compliance with the State Water Resources Control Board (SWRCB) Construction General Permit requirements would be required, including the preparation of a site-specific Storm Water Pollution Prevention Plan (SWPPP). Erosion and sediment control measures (e.g., stabilized construction entrances, spray-on soil stabilizers, staked or weighted straw wattles or fiber rolls, silt fences, etc.) to prevent construction debris from entering nearby stormwater systems would be incorporated into the SWPPP. Additionally, construction of the project would comply with the County's Stormwater Ordinance (Section 15.12), which requires implementation of BMPs to the maximum extent practicable to prevent or minimize non-stormwater or pollutant discharge into County waterways during construction.

Furthermore, since the project involves more than one acre of impervious surface, it is required to provide Low Impact Development (LID), stormwater quality, trash full capture, and hydromodification plans pursuant to the current version of the Stormwater Quality Design Manual for the Sacramento Region. Drainage on the project site will be collected via overland release and subsurface storm drains and directed to several bioretention basins for stormwater quality treatment. Treated waters will then be routed to existing drainage systems beneath Hillsdale Boulevard, Andrea Boulevard, and Elkhorn Boulevard. These improvements are shown in the project plans included in Plate IS-6 and Plate IS-7.

Therefore, construction of the project, with the implementation of the above, would not violate any water quality standards or waste discharge requirements, nor would it substantially degrade surface or ground water quality, and would result in *less than significant* impacts.

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?

Less than significant. The project would be served by Sacramento Suburban Water and California American Water. The water purveyors do not rely solely on groundwater. The increase of 117 multi-family residential units, a 5,867-square-foot, two-story office building, and a 36,660-square-foot, multi-purpose building with amenities for church members would all be developed at a density consistent with zoning. The project does not represent a significant increase in water usage; therefore, the impacts are *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:

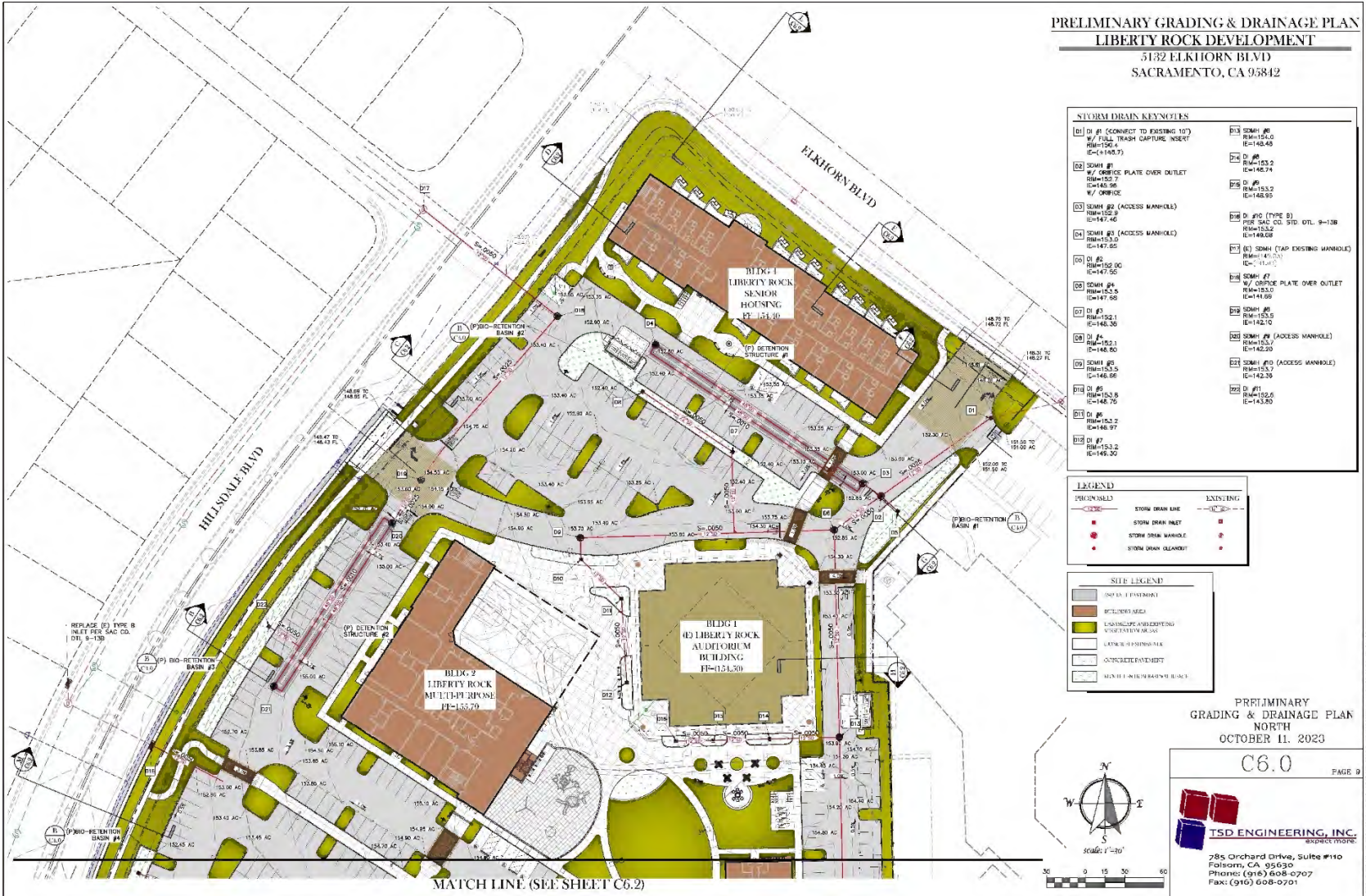
i. result in a substantial erosion or siltation on- or off-site;

Less than significant. During construction there is the potential for erosion from ground disturbing activities; however, as previously discussed compliance with the SWRCB Construction General Permit requirements and the County's Stormwater Ordinance would be required, which would reduce the potential for erosion or siltation. With compliance with the aforementioned requirements, impacts related to erosion and siltation will be *less than significant*.

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

Less than significant. Although construction of the project would result in an increase in impervious surface area, this increase would be less than two acres and would not result in a substantial increase in runoff water that would increase flooding or exceed the capacity of the existing system. The review and approval of the Drainage Study by DWR Staff demonstrates that there would not be flooding on or off-site (Appendix D). Additionally, the project will be required to comply with the County Floodplain Management Ordinance and Stormwater Quality Design Manual. Therefore, implementation of the project would not substantially alter the existing drainage pattern of the project area and would result in *less than significant* impacts on erosion, runoff, and flood flows.

Plate IS-6: Proposed Stormwater Drainage Improvements



PRELIMINARY GRADING & DRAINAGE PLAN
LIBERTY ROCK DEVELOPMENT
 5132 ELKHORN BLVD
 SACRAMENTO, CA 95842

STORM DRAIN KEYNOLES

B1 B1 #1 (CONNECT TO EXISTING 10' W/ FALL TRASH CAPTURE INSET) RIM=150.0 E=148.73	B13 SEMH #10 (CONNECT TO EXISTING 10' W/ FALL TRASH CAPTURE INSET) RIM=150.0 E=148.48
B2 SEMH #1 (ORIFICE PLATE OVER OUTLET) RIM=155.7 E=148.98	B14 SEMH #11 (ORIFICE PLATE OVER OUTLET) RIM=155.7 E=148.74
B3 SEMH #2 (ACCESS MANHOLE) RIM=152.2 E=147.46	B15 SEMH #12 (ACCESS MANHOLE) RIM=152.2 E=148.95
B4 SEMH #3 (ACCESS MANHOLE) RIM=152.0 E=147.95	B16 SEMH #13 (ACCESS MANHOLE) RIM=152.0 E=148.68
B5 SEMH #4 (ACCESS MANHOLE) RIM=152.0 E=147.55	B17 SEMH #14 (ACCESS MANHOLE) RIM=152.0 E=148.08
B6 SEMH #5 (ORIFICE PLATE OVER OUTLET) RIM=155.5 E=147.98	B18 SEMH #15 (ORIFICE PLATE OVER OUTLET) RIM=155.5 E=148.68
B7 SEMH #6 (ORIFICE PLATE OVER OUTLET) RIM=155.2 E=146.36	B19 SEMH #16 (ORIFICE PLATE OVER OUTLET) RIM=155.2 E=148.10
B8 SEMH #7 (ORIFICE PLATE OVER OUTLET) RIM=155.1 E=146.80	B20 SEMH #17 (ACCESS MANHOLE) RIM=155.1 E=142.25
B9 SEMH #8 (ACCESS MANHOLE) RIM=153.5 E=146.66	B21 SEMH #18 (ACCESS MANHOLE) RIM=153.5 E=142.25
B10 SEMH #9 (ACCESS MANHOLE) RIM=153.8 E=148.70	B22 SEMH #19 (ACCESS MANHOLE) RIM=153.8 E=143.80
B11 SEMH #10 (ACCESS MANHOLE) RIM=153.2 E=146.30	

LEGEND

STORM DRAIN LINE	EXISTING
STORM DRAIN INLET	
STORM DRAIN MANHOLE	
STORM DRAIN OUTFALL	

SITE LEGEND

EXISTING PAVEMENT
PROPOSED PAVEMENT
CONCRETE PAVING
ASPHALT PAVING
CONCRETE DRIVEWAY
CONCRETE DRIVEWAY
EXISTING ASPHALT DRIVEWAY

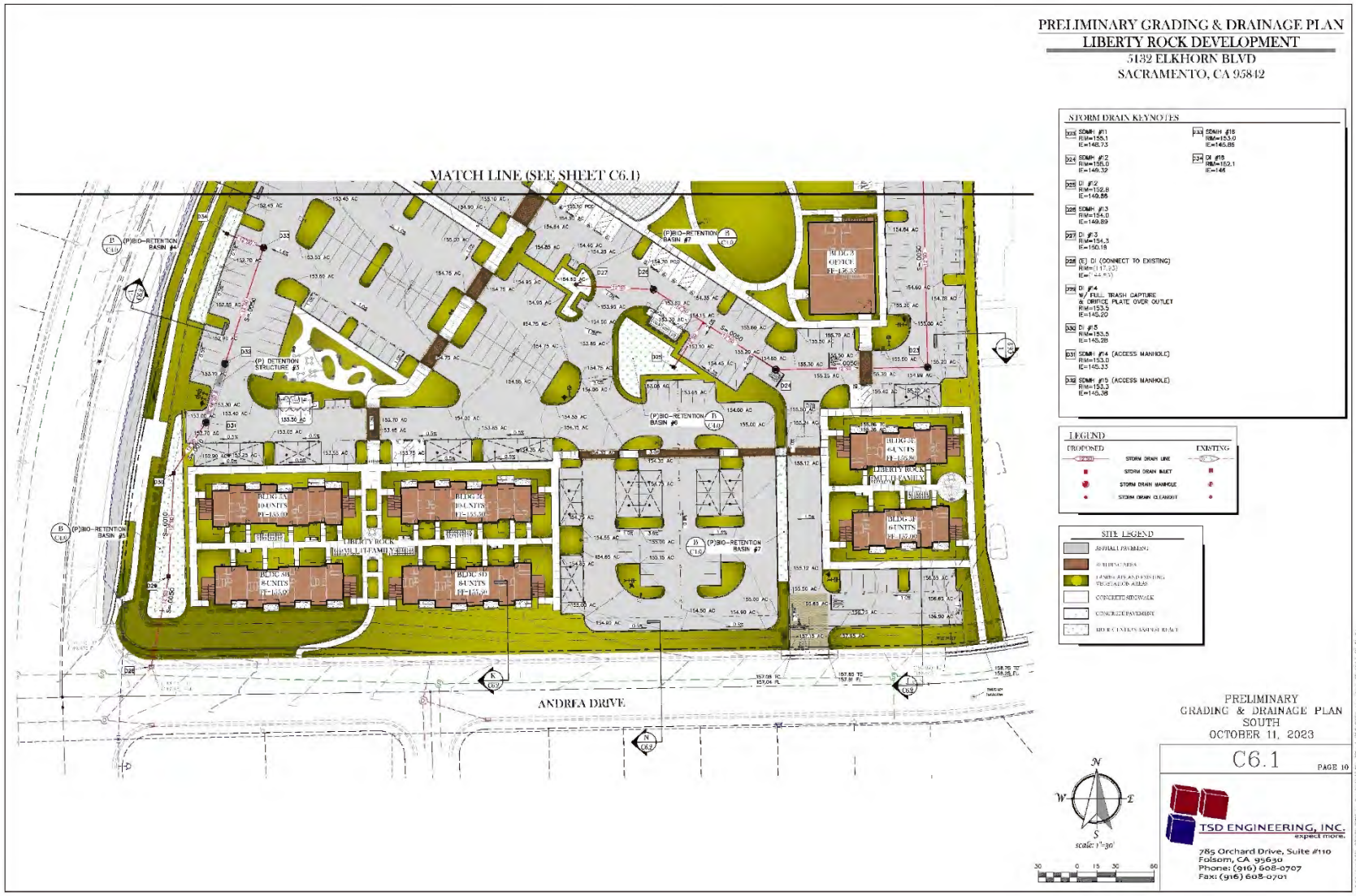
PRELIMINARY GRADING & DRAINAGE PLAN
 NORTH
 OCTOBER 11, 2023



C6.0 PAGE 9

TSD ENGINEERING, INC.
 285 Orchard Drive, Suite #110
 Folsom, CA 95630
 Phone: (916) 608-0707
 Fax: (916) 608-0701

Plate IS-7: Proposed Stormwater Drainage Improvements



- 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*

Less than significant. Since the project involves more than one acre of impervious surface, it is required to provide Low Impact Development (LID), stormwater quality, trash full capture, and hydromodification plans pursuant to the current version of the Stormwater Quality Design Manual for the Sacramento Region. Drainage on the project site will be collected by curb and gutter and conveyed to the 20 bioretention facilities on the project site. Three additional below-ground tank storage areas will be included to meet the hydromodification requirements. These improvements are shown in the project plans included in Plate IS-6 and Plate IS-7. According to the drainage report (Appendix D), proposed on-site storm drainage will capture runoff generated on-site and convey the water through underground pipes to discharge to an existing manhole downstream located at the intersection of Hillsdale Boulevard and Weatherby Way. This drainage infrastructure has a higher capacity to convey the project flows entering the storm drain system.

The drainage report and DWR project conditions also noted existing flooding issues associated with the storm drainpipe on Hillsdale Boulevard. Localized flooding has been reported at 6661 Hillsdale Boulevard, where an existing damaged drainage inlet (DI) fronts the property. The project proposes either to replace or repair the DI at this location. DWR stated discharge from the site will be metered. The proposed drainage infrastructure would all lead to the existing storm drains as they do under existing conditions. With the proposed drainage infrastructure improvements for the project development, including DI improvements at 6111 Hillsdale boulevard, as outlined in the drainage report and DWR's conditions, impacts are ***less than significant***.

- iv. *impede or redirect flood flows?*

Less than significant. According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, the project and surrounding area is within Zone X and area with 0.2% chance flood hazard, or 1% chance flood hazard with depths less than one foot. Flood zone x denotes areas of minimal flood hazard, and the project is not expected to impede or redirect flood flows. Additionally, the project will be required to comply with the Sacramento County Floodplain Management Ordinance. Therefore, impacts related to flood flows will be ***less than significant***.

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

No Impact. The project site is not located in an area subject to the 200-year urban level of flood protection and there would be ***no impact***.

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

Less than significant. The project site is not located in a flood hazard, tsunami, nor seiche zone. A site specific SWPPP would be developed for the project as part of compliance with the SWRCB Construction General Permit requirements. 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?*

No Impact. 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 a marginal increase in impervious surface area, construction and operation of the project would not substantially 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 there would be *no impact*.

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 site is located in the North Highlands community of unincorporated Sacramento County. The North Highlands community is one of four Environmental Justice communities within unincorporated Sacramento County. The General Plan land use designation is Medium Density Residential (MDR) and is within an RD-20 (High Density Multi-Family Residential) zoning district.

GENERAL PLAN

The County’s General Plan consists of 16 elements that outline the long-range vision for development within the County focused on existing needs and character of the County. The Land Use Element establishes a land use classification system as well as land use policies. Within the project area, Elkhorn Boulevard is designated as a pre-2030 thoroughfare in the General Plan, Transportation Diagram (Sacramento County, 2019b). The project vicinity includes low density residential, medium density residential, and commercial land use designations based on the General Plan.

NORTH HIGHLANDS COMMUNITY PLAN

The North Highlands/Foothill Farms Community Plan (Community Plan) was adopted in 1974 with objectives and policies for the development of the community area. There are fewer land use designations within the Community Plan as compared to the General Plan. Land use

designations within the Community Plan are similar to their counterparts within the General Plan. The project vicinity includes a mix of commercial and residential land use designations based on the Community Plan identified land use designations.

ZONING CODE

In addition to the General Plan and the Community Plan, the County's Zoning Code establishes land use zones with standards and regulations for development within those zones. Similar to the General Plan and Community Plan, the project vicinity includes land use zones of Shopping Center, High Density Multifamily Residential, and Low and Medium Density Residential.

IMPACT DISCUSSION

a. Would the project physically divide an established community?

The project consists of the following site improvements:

- 48 multi-family units in six two-story, multi-family apartment buildings with a total area of 31,604 square feet. The units will be available to both church parishioners and the general public.
- 69 senior living units in a three-story, multi-family apartment building with a total area of 44,499 square feet. The units will be available to both church parishioners and the general public.
- A 5,867-square-foot, two-story office building for church administration.
- A 36,660-square-foot, multi-purpose building with amenities for church members. The building would also contain a childcare center for up to 180 children, that would be open to the general public.

The project as proposed would result in in-fill development of a partially vacant lot, which would not conflict with the existing land use pattern in the area or physically divide an established community. Therefore, the project would have *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?

Less than significant. The project is consistent with the land use policies of the General Plan, the North Highlands Community Plan, and Zoning. The project is inconsistent with several development standards and requires a Special Development Permit to allow the proposed project to deviate from the following development standards:

- Multi-family Residential Front Yard Setback (Section 5.4.3.C, Table 5.8.B): The minimum front yard setback with a Public Utilities and Public Facilities Easement (PUPF) is 26 feet. As proposed, the front yard setback of the senior housing building is 25 feet.
- Multi-Family and Institutional Use Fences (Section 5.2.5.C.2): Either a solid wood fence or masonry wall of at least six feet in height shall be provided along the interior property lines when located adjacent to residential zoning districts, except where pedestrian connections are needed. A six-foot tall wrought iron fence is proposed along the eastern property line, adjacent to a residential zoning district.

- Interior Planter Requirements – Additional for Multi-Family Residential and Mixed-Use Developments (Table 5.2): Rows of parking stalls, either open or covered, shall be broken up by a tree planting every seven spaces. There are nine locations in the proposed parking lot where this requirement is not met.

With approval of the Special Development Permit, the proposed project would be consistent with zoning. Although deviations from the Zoning Code development standards are requested through a Special Development Permit, the project would not cause a significant environmental impact due to conflict with any land use plan, policy, regulation. Impacts would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

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 located within a developed urban area and is not located on an important mineral resource recovery site as delineated by the General Plan, a specific plan, or other land use plan.

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?*

No impact. The project site is located within a developed urban area and is not located on an important mineral resource recovery site as delineated by the General Plan, a specific plan, or other land use plan and there would be *no impact*.

- 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?*

No impact. The project site is located within a developed urban area and is not located on an important mineral resource recovery site as delineated by the General Plan, a specific plan, or other land use plan and there would be *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 checked="" type="checkbox"/>	<input 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

The project site is located along both Elkhorn Boulevard and Hillsdale Boulevard, directly adjacent to the intersection of these roadways. Given the site’s location along major roadways, the primary noise source is mobile traffic. Other noise sources are related to playground noise from the operational activities of the proposed day care center.

SENSITIVE RECEPTORS

Noise sensitive uses typically include residences, hospitals, schools, childcare facilities, and places of assembly. The nearest sensitive receptors to the project site consist of both single-family and duplex residences and multi-family residences. On-site is an existing church (place of assembly). Another church is located directly adjacent to the project site. The project proposes the construction of both multi-family and senior housing apartment units on-site.

INDOOR SENSITIVE RECEPTORS

The project site is adjacent to a multi-family apartment complex to the northeast (5101 Andrea Boulevard), duplexes to the northwest (across Hillsdale Boulevard) and single-family residences to the south (across Andrea Boulevard). The project proposes 48 multi-family apartment units at the southern portion of the project site, fronting Andrea Boulevard, and 69 senior housing units at the northeast portion of the site fronting both Elkhorn and Hillsdale Boulevards. The indoor habitable area of residential uses is considered sensitive to external noise sources.

OUTDOOR SENSITIVE RECEPTORS

Although there are private patios/balconies associated with each apartment housing unit within the proposed multi-family and senior housing apartment complexes, per the General Plan Noise Element, individual patios and balconies of multi-family developments are not considered to be sensitive outdoor areas. Both proposed complexes will have outdoor common areas, which are

subject to the General Plan Noise Element. The day care/school use will have playground and playing court areas that are also subject to the General Plan Noise Element.

MOBILE TRAFFIC RELATED NOISE

An Environmental Noise Assessment was prepared for the project by Bollard Acoustical Consultants, Inc. dated November 24, 2021 (Appendix E). In the assessment, future roadway noise levels were calculated for Elkhorn Boulevard and Hillsdale Boulevard using the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA-RD-77-108). The model utilizes average daily trips (ADT) counts and posted roadway speeds to estimate average vehicle noise rates. Future ADT for the roadways were conservatively estimated by increasing the existing ADT volumes by a factor of 50% to account for regional growth in the next twenty years. The predicted calculated future exterior traffic noise levels at certain sensitive receptor locations on-site are shown in Table IS-11.

Table IS-11: Predicted Future Exterior Traffic Noise Levels at the Project Site

Roadway	Proposed Use	Location	Future Exterior DNL (dB)
Elkhorn Boulevard	Senior Housing	Common Outdoor space	63
		First-Floor building facade	77
		Upper-floor building facades	79
Elkhorn Boulevard	Day Care/School	Playground	56
		Playing Court	62
		Building facade	63
Elkhorn Boulevard	Apartments	Nearest common outdoor space	60
		Nearest first-floor building facade	61
		Nearest upper-floor building facade	63
Hillsdale Boulevard	Senior Housing	Common Outdoor space	62
		First-Floor building facade	70
		Upper-floor building facades	72
Hillsdale Boulevard	Day Care/School	Playground	56
		Playing Court	60
		Building facade	66
Hillsdale Boulevard	Apartments	Nearest common outdoor space	63
		Nearest first-floor building facade	69
		Nearest upper-floor building facade	71

Future Exterior DNL (db) Column Footnote: Negative offsets were applied at some locations to account for shielding that would be provided by existing and/or proposed intervening structures, where applicable. Complete listings of FHWA Model inputs are provided in Appendix D of the Environmental Noise Assessment (Appendix E). Source: Bollard Acoustical Consultants, Inc. (2021)

REGULATORY SETTING

COUNTY GENERAL PLAN NOISE ELEMENT

The goals of the Sacramento County General Plan Noise Element are to: (1) protect the citizens of Sacramento County from exposure to excess noise and (2) protect the economic base of

Sacramento County by preventing incompatible land uses from encroaching upon existing planned noise-producing uses. The General Plan defines a noise sensitive outdoor area as the primary activity area associated with any given land use at which noise sensitivity exists. Noise sensitivity generally occurs in locations where there is an expectation of relative quiet or where noise could interfere with the activity which takes place in the outdoor area. An example is a backyard, where loud noise could interfere with the ability to engage in normal conversation.

The Noise Element of the Sacramento County General Plan establishes noise exposure criteria to aid in determining land use compatibility by defining the limits of noise exposure for sensitive land uses.

Policy NO-1 of the Noise Element discusses noise receptors or sources as they relate to transportation noise. NO-1 states the following: The noise level standards for noise-sensitive areas of new uses affected by traffic or railroad noise sources in Sacramento County are shown in Table 1. Where the noise level standards of Table 1 are expected to be exceeded at new uses proposed within Sacramento County which are affected by traffic or railroad noise, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 1 standards. expected to be exceeded. Table 1 of the General Plan Noise element is shown in Table IS-12 below.

Policy NO-6 of the Noise Element discusses noise receptors or sources as they relate to non-transportation noise, and interior and exterior noise. NO-6 states the following: where a project would consist of or include non-transportation noise sources, the noise generation of those sources shall be mitigated so as not to exceed the interior and exterior noise level standards of Table 2 at existing noise-sensitive areas in the project vicinity. Table 2 of the General Plan Noise element is shown in Table IS-13 below.

Table IS-12: Sacramento County Traffic and Railroad Noise Standards

New Land Use	Sensitive Outdoor Area – L_{dn}	Sensitive Interior Area – L_{dn}
All Residential ⁵	65	45
Transient lodging ^{3,5}	65	45
Hospitals and nursing homes ^{3,4,5}	65	45
Theaters and auditoriums ³	None	35
Churches, meeting halls, schools, libraries, etc. ³	65	40
Office buildings ³	65	45
Commercial buildings ³	None	50
Playgrounds, parks, etc	70	None
Industry ³	65	50

Source: Table 1 of Noise Element

Notes:

1. Sensitive areas are defined in acoustical terminology section.
2. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.
3. Where there are no sensitive exterior spaces proposed for these uses, only the interior noise level standard shall apply.
4. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation either by hospital staff or patients.
5. If this use is affected by railroad noise, a maximum (L_{max}) noise level standard of 70 dB shall be applied to all sleeping rooms to reduce the potential for sleep disturbance during nighttime train passages.

Table IS-13: Non-Transportation Noise Standards Median (L₅₀)/Maximum (L_{max})

New Land Use	Outdoor Area		Interior
	Daytime	Nighttime	Day and Night
All Residential	55 / 75	50 / 70	35 / 55
Transient lodging ⁴	55 / 75	---	35 / 55
Hospitals and nursing homes ^{5,6}	55 / 75	---	35 / 55
Theaters and auditoriums ⁶	---	---	30 / 50
Churches, meeting halls, schools, libraries, etc. ⁶	55 / 75	---	35 / 60
Office buildings ⁶	60 / 75	---	45 / 65
Commercial buildings ⁶	---	---	45 / 65
Playgrounds, parks, etc ⁶	65 / 75	---	---
Industry ⁶	60 / 80	---	50 / 70

Source: Table 2 of the Noise Element

Notes:

1. Table 2 standards shall be reduced by five (5) dB for sounds consisting primarily of speech or music, and for recurring impulsive sounds. If the existing ambient noise level exceeds the standards of Table 2, then the noise level standards shall be increased at five (5) dB increments to encompass the ambient noise.
2. Sensitive areas are defined in the acoustic terminology section.
3. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in closed positions.
4. Outdoor activity areas of transient lodging facilities are not commonly used during nighttime hours.
5. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.
6. The outdoor activity areas of these uses (if any) are not typically utilized during nighttime hours.
7. Where median (L_{50}) noise level data is not available for a particular noise source, average (Leq) values may be substituted for the standards of this table provided the noise source in question operates for at least 30 minutes of an hour. If the source in question operates less than 30 minutes per hour, then the maximum noise level standards shown would apply.

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-RELATED NOISE

Less than significant. Section 6.68.090(e) of the Sacramento County Code specifies that noise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property are exempt from the County's noise regulations provided that these activities do not take place between the hours of 8 p.m. and 6 a.m. on weekdays and Friday commencing at 8 p.m. through and including 7 a.m. on Saturday; Saturdays commencing at 8 p.m. through and including 7 a.m. on the next following Sunday and on each Sunday after the hour of 8 p.m.

Construction for the project consists of removal of trees, grading, placement of subsurface utilities, paving, curb and gutter, and building construction. Construction would be temporary and the largest construction machinery would likely include a backhoe or dozer. Sacramento County does not have established quantitative construction noise thresholds, so the Federal Transit Administration's (FTA) threshold of 80 dBA equivalent noise level (Leq) over an 8-hour period was used. Due to the complex and mobile nature of construction activity within a project site, the FTA Transit Noise and Vibration Impact Assessment Manual document recommends evaluating construction noise impacts from the center of the construction site, stating that the distance variable in its recommended construction noise calculation "assumes that all equipment operates at the center of the project" (FTA 2018). The nearest sensitive receptor to the center of the project site is the backyard of a single-family residence located approximately 165 feet to the northwest from the center of the project site. The reference level for a dozer at 50 feet is 85 dBA (FTA 2018). Utilizing a moving attenuation model, the projected noise level of a dozer would be 77.22 dBA, which does not exceed the FTA threshold of 80 dBA equivalent noise level (Leq) over an 8-hour period at the nearest sensitive receptor; therefore, it would not exceed that threshold at any sensitive receptor located at a further distance.

In addition, construction of the project is assumed to occur between the allowable hours stated in Section 6.68.090(e) of the Sacramento County Code (between 6:00 a.m. and 8:00 p.m. on weekdays and between 7:00 a.m. and 8:00 p.m. on weekends). Therefore, temporary construction noise impacts resulting from the project would be ***less than significant***.

TRAFFIC NOISE

EXTERIOR TRAFFIC NOISE

Less than significant. According to the General Plan, exterior traffic noise is identified as traffic noise impacting outdoor common areas or activity areas and residential back yard spaces. Due to the potential for elevated Elkhorn Boulevard and Hillsdale Boulevard traffic noise at the project site a noise assessment was required. The noise assessment specifically quantified noise levels from future traffic on Elkhorn Boulevard and Hillsdale Boulevard at proposed residential uses and outdoor play areas and compared these levels with Sacramento County General Plan criteria for acceptable exterior and interior noise exposure.

The noise assessment concludes that future exterior traffic noise levels are predicted to meet County noise standards for exposure at outdoor common areas of the project's residential uses nearest to roadways and outdoor play areas of the project's day care/school uses (i.e. playground and playing court). See Table IS-11, Location and Future Exterior DNL (dB) columns for predicted traffic noise levels at the project's outdoor common areas. Impacts to exterior noise levels at outdoor sensitive activity areas from future exterior traffic noise levels are ***less than significant***.

INTERIOR TRAFFIC NOISE

Less than significant with mitigation. Interior traffic noise is identified as traffic noise impacting the indoor areas of residential uses, schools, churches and a number of other commercial and institutional uses. According to the noise assessment prepared for the project, interior traffic noise levels are predicted to meet County interior noise standards, provided that future traffic noise levels do not exceed 70 dB DNL at exterior building facades for the project's residential uses, or 65 dB DNL at the exterior building facades of the project's day care/school uses. The noise assessment recommends standard building construction upgrades (stucco siding, STC-32, STC-33, and STC-37 windows, door weather-stripping, exterior wall insulation, composition plywood roof) to reduce noise levels for portions of the development as illustrated in Plate IS-8 and Plate IS-9. In addition, mechanical ventilation (air conditioning) is recommended for all buildings within the project development to allow occupants to close doors and windows as desired for additional acoustical isolation. These recommendations are noise mitigation measures for the project. Impacts to interior noise levels from future exterior traffic noise levels are ***less than significant with mitigation***.

PLAY AREA NOISE

Less than significant. A playground and playing court will be located adjacent to the project's daycare/school use. These uses are considered noise generating uses that can affect sensitive receptors. The primary noise source associated with the play area use is shouting children, with potential noise impacts on the project's residential uses. The noise assessment analyzed predicted noise levels from the outdoor play areas on proposed residential uses and determined noise exposure will comply with County standards for daytime exterior and interior noise level limits (refer to Table IS-13). Combined noise level decibels for the playground and play court were 42 L₅₀ and 62 L_{max} at the proposed senior housing common outdoor space, and 40 L₅₀ and 60 L_{max} at the senior housing building façade nearest to the outdoor recreation area. Combined noise level decibels for the playground and play court were 35 L₅₀ and 55 L_{max} at the proposed multi-family apartment common outdoor space, and 40 L₅₀ and 60 L_{max} at the multi-family apartment building façade nearest to the outdoor recreation area. Impacts to exterior and

interior project residential noise levels from the proposed outdoor play areas are *less than significant*.

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

Less than significant. The project does not include any substantial vibration sources associated with operation. Therefore, construction activities carried out during the site preparation phase have the greatest potential to generate groundborne vibration affecting nearby receptors. Construction activities generating high levels of vibration, such as impact pile driving and blasting, are not proposed. Based on the construction equipment list expected for a project of this type and size, equipment with the potential to generate the greatest vibration levels would be a large bulldozer, which generates a vibration level up to 0.089 in/sec PPV at a reference distance of 25 feet (FTA 2018). Based on the project site plan, these equipment types may be used approximately 37 feet from the nearest residential structure to the south. At this distance, a large bulldozer would generate vibration levels up to approximately 0.049 in/sec PPV, which would not exceed the FTA's threshold of 0.2 in/sec PPV. Therefore, temporary construction vibration impacts resulting from the project would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

The following mitigation measures would be implemented during construction of the project to reduce potential impacts related to noise.

NO-1: UPGRADE OF WINDOWS AND DOORS (STC-32, STC-33, AND STC-37)

To achieve compliance with the applicable General Plan interior noise level criteria including a factor of safety, all windows and doors (where applicable) of building façades illustrated in Plate IS-8 and Plate IS-9 be upgraded to the minimum STC rating indicated.

NO-2: MECHANICAL VENTILATION

Mechanical ventilation (air conditioning) shall be provided for all residences in this development to allow the occupants to close doors and windows as desired to achieve compliance with applicable General Plan interior noise level criteria.

Plate IS-8: Project Site Plan (North) and Interior Noise Compliance Mitigation



Plate IS-9: Project Site Plan (South) and Interior Noise Compliance Mitigation



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 type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located in the North Highlands community of unincorporated Sacramento County. The project site is located on a 10.58-acre parcel developed with an existing church. The parcel has a Medium Density Residential General Plan land use designation and is in a RD-20 zoning district.

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)?*

Less than significant. The construction of 117 multi-family residential units in an established residential community would not result in substantial unplanned growth in the community, nor would it result in the extension of roadways or other infrastructure. The project is consistent with the General Plan land use designation and zoning district. Impacts are *less than significant*.

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

No impact. The project does not involve the demolition of any residential structures and would not displace people— *no impact*.

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 type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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

The project site is located within the urbanized North Highlands community of unincorporated Sacramento County and public services and infrastructure are provided to the area. The site is served by the Sacramento Metropolitan Fire District and the Sacramento County Sheriff's Department. The project site is located within the Twin Rivers Unified School District. Neighborhood and community parks are serviced by the Sunrise Recreation and Park District.

FIRE PROTECTION

The project area is within the Sacramento Metropolitan Fire District (SMFD) service area. The closest fire station to the project area is Sacramento Metro Fire District Station 41 located at 6900 Thomas Drive, approximately 1.7 miles northwest of the project area. In addition, Sacramento Metro Fire District Station 112 is located at 3337 Elkhorn Boulevard, which is approximately 2.4 miles west of the project area.

POLICE PROTECTION

Sacramento County Sheriff's Department provides police protection within the project area. The project area is within the service area of North West District One, which provides law enforcement services to the northern portion of the County. The North Division station is located at 5510 Garfield Avenue, approximately 1.8 miles southeast of the project area.

SCHOOLS

The project area is within the Twin Rivers Unified School District. As previously discussed, the project site is located within 0.2 miles north of the Frontier Elementary School. Liberty Towers Christian (private school) is located on site. Foothill High and Westside Preparatory Charter

(Eastside Campus) are located approximately 0.4 miles south and west, respectively, of the project parcel. Highlands High, St. Lawrence Elementary, Warren A. Allison Elementary, Woodridge Elementary, Kohler Elementary, Pioneer Elementary, Foothill Oaks Elementary, and Ridgepoint Elementary are within one mile of the project parcel.

PARKS

There are several neighborhood and community parks within an approximate one-mile distance from the project parcel including Robert Frost Park, Rushmore-Jeanie Park, Cabana Park, Chardonay Park, Ridgepoint Park, William T. Mason Park, Pioneer Park, Greenback Woods Park, and Foothill Community Park.

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?

No impact. The project site is currently served by the Sacramento Metropolitan Fire District. The project will build out the site, consistent with existing General Plan, Community Plan, and Zoning designations. The project would continue to be served by this provider and would not increase the need for additional fire-fighting personnel, facilities, or equipment—**no impact.**

Police protection?

No impact. The project site is currently served by the Sacramento County Sheriff's Department. The project will build out the site, consistent with existing General Plan, Community Plan, and Zoning designations. The project would continue to be served by this provider and would not increase the need for additional police personnel, facilities, or equipment—**no impact.**

Schools?

Less than significant. The project site is within the Twin Rivers Unified School District. The construction of 48 multi-family residential units would not result in a substantial increase in student population to the Twin Rivers Unified School District. The project would utilize existing schools and would not substantially increase the need for additional teaching personnel or facilities—**less than significant.**

Parks?

Less than significant. The project is within the Sunrise Recreation and Park District. There are several neighborhood and community parks within close vicinity to the project site. The project would not substantially increase the need for park personnel or facilities but would require the payment of in-lieu fees or parkland dedication, pursuant to Sacramento County Code. With compliance with County Code, impacts related to parks are **less than significant.**

Other public facilities?

Less than significant. The project is in an area with existing public infrastructure. The project will build out the site, consistent with existing General Plan, Community Plan, and Zoning designations. The development would not substantially increase the need for additional personnel, facilities, or equipment— *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 is within the Sunrise Recreation and Park District. There are several neighborhood and community parks within an approximate one-mile distance from the project parcel including Robert Frost Park, Rushmore-Jeanie Park, Cabana Park, Chardonay Park, Ridgepoint Park, William T. Mason Park, Pioneer Park, Greenback Woods Park, and Foothill Community Park.

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?

Less than significant. The project is within the Sunrise Recreation and Park District. There are several neighborhood and community parks within close vicinity to the project site. The construction of the project would not substantially increase the need for park personnel or facilities but would require the payment of in-lieu fees or parkland dedication, pursuant to Sacramento County Code. With compliance with County Code, impacts to recreation facilities are *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?

Less than significant. The project is within the Sunrise Recreation and Park District. There are several neighborhood and community parks within close vicinity to the project site. The project would not require the construction or expansion of recreational facilities that would result in an adverse physical effect on the environment— *less than significant*.

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 type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located at the eastern corner of Hillsdale Boulevard and Elkhorn Boulevard intersection. The southern boundary line is along Andrea Drive. The site has existing access along each of the roadways. There are sidewalks, curbs and gutter along Elkhorn Boulevard and Andrea Drive. The sidewalk along Hillsdale Boulevard extends approximately 360 feet south from its intersection with Elkhorn Boulevard, with unimproved frontage the remainder of the parcel towards Andrea Drive.

The project site is located along Elkhorn Boulevard, which is identified as a Pre-2030 Thoroughfare with maintained speeds of 45-miles per hour (MPH). Elkhorn Boulevard serves the residential uses surrounding the site while also providing an east-west throughway between Watt Avenue and Interstate 80. The closest roadway intersection is the intersection of Elkhorn Boulevard and Hillsdale Boulevard, which is directly adjacent to the project site at the northwest corner. Hillsdale Boulevard is identified as a Pre-2030 arterial – 4 lanes with maintained speeds of 35 MPH. The identified intersection of Elkhorn Boulevard and Hillsdale Boulevard is signal controlled.

Elkhorn Boulevard is identified as Post 2030 Transit Corridor. Post 2030 road segments or projects are considered not necessary or not scheduled in the 20-year planning horizon

identified within the General Plan Circulation Element. Elkhorn Boulevard includes a Class Two Bike Lane along the project frontage.

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?*

Less than significant. Access to the project would stem from Hillsdale Boulevard, Elkhorn Boulevard, and Andrea Drive. The existing access along Hillsdale Boulevard and Elkhorn Boulevard would remain in the same location. Access along Andrea Boulevard would move to the west approximately 120 feet. The project would be required to provide new public street improvements along Hillsdale Boulevard for the length of the parcel, including curb and gutter, sidewalks, and streetlights, in compliance with County standards. Although the project would result in 1,369 daily vehicle trips, it would not impede existing transportation access. The project would not conflict with the existing program, plan, ordinance or policy addressing the circulation system. Impacts are *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?*

Less than significant. Sacramento County Department of Transportation (SacDOT) staff (Cameron Shew and Gary Gasperi) reviewed the project and determined the elements of the project screen out from further VMT analysis. According to Table 3-1 in SacDOT's Transportation Analysis Guidelines (TAG), a number of uses can be screened out from a VMT analysis including small projects that generate 230 average daily trips or less, local serving public facilities/services, and residential projects located in VMT efficient areas. The approved Sacramento Area Council of Governments (SACOG) Residential VMT Screening Map shows that the project site exists in a VMT efficient area that produces less than 50-85% of the average regional VMT.

Based on the TAG the residential components of the project screen out from further analysis. Similarly, the office building and day care component also screen out from further analysis as they are considered local serving facilities.

A local transportation analysis was prepared for the project by KD Anderson & Associates (Appendix F) to assess how the proposed project will affect traffic operations at nearby intersections, as well as vehicle queueing at intersections, at roadway turn pockets, at the site access points and internal to the project site. This analysis included a trip generation table for the components of the proposed project including the church facility. The analysis found that the church facility would generate 101 average daily traffic (ADT). Given the ADT, the church use is considered a small project based on the TAG and also screens out from further analysis. Therefore, impacts related to VMT are *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)?*

Less than significant. The project will not substantially increase hazards due to a geometric design feature related to sharp curves or incompatible uses. The traffic analysis prepared by KD Anderson concluded that the project's traffic will cause an increase in the length of peak period

queues at the westbound Elkhorn Boulevard left turn lane at Hillsdale Boulevard. Since queues in excess of storage may cause a safety hazard, the report recommended the possibility to lengthen the existing left turn lane by modifying the landscaped median east of the intersection to provide adequate storage. Sacramento County Department of Transportation (SacDOT) reviewed and accepted the traffic analysis with the condition of approval to extend the left turn pocket by 60 feet on the east leg of the Elkhorn/Hillsdale Boulevard intersection pursuant to Sacramento County Improvement Standards and to the satisfaction of SacDOT. The condition will be applied prior to the approval of the project's improvement plans and the issuance of a Certificate of Occupancy. This condition will require the removal of three (3) small non-native landscaping trees within the median of Elkhorn Boulevard (see Biological Resources section above). With SacDOT's conditions, project impacts related to traffic hazards due to geometric design features for intersections are *less than significant*.

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

No impact. Existing public roadways would remain open during construction and would provide access to the project site.

Sac Metro Fire has reviewed the proposed project and submitted comments and conditions outlining fire access standards, which will be reviewed prior to final map recordation, improvement plans and building permits. Compliance with Sac Metro requirements will ensure that the project would not result in inadequate emergency access and would have *no impact*.

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"/>

<p>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.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ENVIRONMENTAL SETTING

The project site is partially developed, and the project request will intensify this underutilized site with additional land uses in coordination with the church use, including housing, day-care, and recreational amenities. According to historic aerial imagery, the site was developed with a church use, associated parking lot, and other amenities associated with the church after 1995. The property immediately adjacent, to the east of the project site, was developed with a church and associated parking lot after 1973. A Cultural Resources Report was prepared for the project by Analytical Environmental Services (AES) dated June 27, 2018.

REGULATORY SETTING

AB 52 (effective July 1, 2015) added Public Resources Code Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to CEQA, relating to consultation with California Native American tribes, consideration of “tribal cultural resources,” and confidentiality. Tribal cultural resources includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribes (Office of Planning and Research, 2017) and may be physical remains or places within a landscape (i.e., gathering places, sacred sites, features, plants, etc.).

AB 52 provides procedural and substantive requirements for lead agency consultation with California Native American tribes and consideration of effects on tribal cultural resources, as well as example of mitigation measures to avoid or minimize impacts to tribal cultural resources. AB 52 establishes that if construction of a project may cause a substantial adverse change in the significance of a tribal cultural resource, that project may have a significant effect on the environment. Lead agencies must avoid damaging effects to tribal cultural resources, when feasible, and keep information submitted by tribes confidential.

AB 52 requires a lead agency to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. Section 21080.3.1(d) states that within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency will provide formal notification to the designated contact of or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one (1) written notification that includes a brief description of the proposed project location and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

In accordance with AB 52, the County sent notification letters to Native American contacts, Wilton Rancheria, United Auburn Indian Community (UAIC), and Lone Band of Miwok Indians on December 15, 2023. None of the tribes responded within the 30-day period; therefore, the County closed consultation.

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)?*

No impact. There is no evidence indicating the presence of tribal cultural resources near the project site. The Sacred Lands File (SLF) search completed by the Native American Heritage Commission (NAHC) indicated negative results for the project site. The only historical resource identified in the NCIC record search is located 0.25 miles northwest of the site and would not be impacted by the proposed project. Additionally, no resources were identified during pedestrian survey efforts or in the AES cultural report; therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource pursuant to § 21074 – **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?*

Less than significant with mitigation. On December 15, 2023, requests for consultation were sent to three (3) native nations who have requested to receive notice of consultation in accordance with AB-52: Lone Band of Miwok Indians, United Auburn Indian Community, and the Wilton Rancheria. Staff did not receive a response initiating consultation, and closed the AB-52 review period. There is no information suggesting that there are tribal cultural resources in the vicinity of the project site. In the event of unanticipated discovery, Mitigation Measure CR-1 and CR-2 will ensure proper evaluation and management of unanticipated discoveries of potential tribal cultural resources (TCRs), archaeological, or cultural resources that may occur during the project's ground-disturbing activities. Therefore, impacts would be **less than significant with mitigation.**

ENVIRONMENTAL MITIGATION MEASURES

No additional mitigation required. Refer to Mitigation Measure CR-1: Unanticipated Discovery of Cultural Resources and CR-2: Unanticipated Discovery of Human Remains as listed in Section VI (Cultural Resources) above.

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 checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Utilities and public services for the project site are provided by the following entities:

- Local and Regional Sanitation: SacSewer
- Electricity Provider: Sacramento Metropolitan Utility District (SMUD)
- Natural Gas: Pacific Gas & Electric Company (PG&E)
- Refuse and Recycling Provider: Sacramento County Waste Management & Recycling
- Water District: Sacramento Suburban Water & California American Water

The project site is located in a developed area of the North Highlands community. SMUD has 12kV overhead lines on the project site along Elkhorn Boulevard. Existing sewer and stormwater facilities are located along the surrounding roadways.

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?*

Less than significant. The project involves the minor extension of storm water drainage facilities throughout the project site to connect to existing stormwater facilities beneath area roadways. Utility extension and relocation will occur within the project site or within the paved public right of way. Neither the proposed project, nor potential relocation of existing utility infrastructure would cause a significant environmental impact. Impacts are *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?*

Less than significant. The project would be served by both California American Water and Sacramento Suburban Water District. The water purveyors do not rely solely on groundwater. The project would developed at a density consistent with zoning and does not represent a significant increase in water usage; therefore, the impacts are *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?*

Less than significant. The proposed project was reviewed by utility providers, including the wastewater treatment provider (SacSewer). No capacity concerns were reflected according to SacSewer review of the project. Impacts are *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?*

Less than significant. The Kiefer Landfill has the capacity to accommodate solid waste until the year 2050. Additionally, implementation of the project would comply with all applicable federal, State, and local solid waste statutes and regulations, including compliance with the CALGreen Code and the County's Construction and Demolition Debris program. Impacts are *less than significant*.

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

Less than significant. 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. No significant new impacts would result from stormwater facility extension. Impacts are *less than significant*.

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

Less than significant. Minor extension and possible relocation of existing SMUD infrastructure would be necessary to serve the proposed project. Existing overhead powerlines are located along Elkhorn Boulevard, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from electrical utility extension. Impacts are *less than significant*.

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

Less than significant. The project site is located within the Sacramento County Waste Management and Recycling service area. Construction and operations would have solid waste and recycling services and would be subject to federal, state, and local management and reduction statutes and regulations. Impacts are *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XXI. WILDFIRE

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 area is in an urban community and is not within or near a State Responsibility Area (SRA) or a fire hazard severity zone (FHSZ). The project area is within the Local Responsibility Area (LRA) for Sacramento County, and fire protection is provided by the Sacramento Metropolitan Fire District (see Section XVI Public Services for further discussion); however, there are no FHSZ in the LRA that encompasses the project area (California Department of Forestry and Fire Protection, 2024).

IMPACT DISCUSSION

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

Less than significant. The project site is not denoted within a State or Local Fire Hazard Severity Zone Map. Areas of Sacramento County which are not located within a State Responsibility Area have not been reviewed for wildfire hazard severity due to the distance from wildland areas. Fuel levels observed within wildland areas are not typically found in large quantities within urbanized areas due to the replacement of potential fuel sources with the built environment.

Project construction would not require the complete closure of any public or private streets or roadways during construction. Temporary construction activities would not impede use of roadways for emergencies or access for emergency response vehicles. In addition, the project would be required to comply with Sacramento Metropolitan Fire District development requirements concerning emergency access and circulation. Therefore, impacts would be *less than significant*.

- 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?*

No impact. The project site is flat and does not support areas of steep slopes. In addition, the project site is located within an urbanized area of the North Highlands community, where the risk of wildland fire is decreased. As such, the proposed project would not be located in a critical fire danger zone or adjacent to wildlands subject to wildfires. Urban levels of fire protection would be provided to the project area. In addition, the project would adhere to building codes and any conditions included through review by the Sacramento Metropolitan Fire District. 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 on the environment?*

No impact. The proposed project would connect to existing electricity, water, and other utilities necessary to serve the site. Specifications for project infrastructure improvements would be subject to County requirements and review as well as Sacramento Metropolitan Fire District plan check as required for issuance of a building permit to ensure compliance with the applicable fire and life safety regulations, codes, and ordinances. Therefore, there would be *no impact*.

- 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?*

No impact. The project site is within the urbanized area of the North Highlands community. The project site is generally flat and not within a very high or high 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 checked="" type="checkbox"/>	<input 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 in Section V. (Biological Resources), potential impacts were identified to nesting migratory birds and raptor species, as well as the removal of both native and non-native trees. The project will require the removal of up to 67 non-native trees (including three (3) small non-native landscaping trees within the median of Elkhorn Boulevard) and two (2) native trees. The project would implement BIO-1 and BIO-2, to mitigate impacts to migratory birds and raptors which may be on site during construction activities. Additionally, the project would implement BIO-3, BIO-4 to mitigate impacts to native oak trees and non-native tree canopy. With adherence to the listed mitigation measures, these impacts will be *less than significant*.

As discussed in Section VI. (Cultural Resources), Section VIII. (Geology and Soils), and Section XIX. (Tribal Cultural Resources), there is potential for inadvertent discoveries of cultural resources, human remains, and paleontological resources. However, CR-1, CR-2, and GEO-1 would be implemented, and impacts would be reduced to *less than significant*.

As discussed in Section IX. Greenhouse Gas, there is potential for greenhouse gas emissions to exceed allow thresholds of significance. This potential is further impacted by the estimated transportation demand required to both construct and operate the project as proposed. However, GHG-1 would be implemented, and impacts would be reduced to *less than significant*.

As discussed in Section IV (Air Quality), the project would result in air emissions during construction of the project. However, Mitigation Measure AQ-1 would be implemented and would reduce these project-specific impacts to *less than significant*.

- 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.)*

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. The project is an infill parcel that is consistent with the guidelines of the General Plan. Therefore, there is a low likelihood of contributing to cumulative impacts, as the surrounding area is already developed. The project is the development of an existing church property to expand the church use and build residential housing where there are potential impacts to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, and noise. These impacts have been mitigated to less than significance and do not represent incremental effects that would be cumulatively considerable. Therefore, 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?*

No substantial adverse effects, either directly or indirectly affecting human beings, were identified. Therefore, impacts would be *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

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

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for Liberty Towers as follows:

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is **\$8,900.00**. This fee includes administrative costs of **\$1,097.00**.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

LIST OF PREPARERS

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APPENDIX A

Liberty Towers Church Project Air Quality and Greenhouse Gas Emissions Assessment

APPENDIX B

Arborist Report, Liberty Towers Church Project

APPENDIX C

Custom Soil Resource Report for Sacramento County, California: Liberty Towers

APPENDIX D

**Liberty Rock Development: Level 3 Drainage Study Zone 11C
(PLNP2021-00122)**

APPENDIX E

Environmental Noise Assessment: Liberty Rock Development

APPENDIX F

Transportation Impact Analysis for Liberty Towers