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WHEN RECORDING MAIL TO:

County of Sacramento
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
CONTACT PERSON: Julie Newton
TELEPHONE: (916)874-6141

ENDORSED
SACRAMENTO COUNTY
OCT 02 2025
FLORENCE EVANS, CLERK/RECORDER
BY _____ DEPUTY

SPACE ABOVE RESERVED FOR RECORDER'S USE

NOTICE OF EXEMPTION

Project Title:
Dobbs Peterbilt Truck Center

Control Number:
PLNP2024-00234

Project Location:
The project is located within the Metro Air Park (MAP) Special Planning Area (SPA) at the intersection of Metro Air Parkway and West Elkhorn Boulevard, in the Natomas community of unincorporated Sacramento County.

APN:
201-1020-013-0000

Description of Project:
The project includes the construction of a new 58,000-square-foot truck dealership encompassing approximately 14.5 acres of an existing 25-acre parcel within District 5C of the MAP SPA. The facility will be located on the southwest corner of the parcel at the intersection of Bear Paw Drive and West Elkhorn Boulevard. The facility will sell new and used Class 8 trucks, provide truck maintenance service through 25 service bays, and include a warehouse, will-call area, parts delivery, retail parts store, and a sales office. The facility will employ over 70 people within its various departments and the expected hours of operation will be Monday through Friday, 8:00 am to 5:00 pm.

The project will require approval of the following entitlements:

1. A **Use Permit** to allow a Truck Dealership and Service Center in District 5C of the Metro Air Park Special Planning Area (SPA).

2. A **Design Review** to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines).

Name of Public Agency Approving Project:
Sacramento County – ceqa@saccounty.gov

Person or Agency Carrying out Project:
Michale A. Orians
WTPE Real Estate Holdings, LLC
2800 136th Avenue, Court E.
Sumner, WA 98390
(870) 514-1203
Jerry@dobbsmanagement.com

Exempt Status:

Public Resources Code (PRC) Section 21083.3; CEQA Guidelines Section 15183(a) – Projects consistent with development densities established by existing zoning, community plan or general plan policies.

Reasons Why Project is Exempt:

Section 15183 (PRC Section 21083.3), provides that projects which are consistent with the development density established by zoning, community plan, or general plan policies for which an environmental impact report (EIR) has been certified "shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." An EIR was prepared and certified by the Board of Supervisors for the Sacramento County General Plan Update (SCH# 2007082086) incorporated by reference and available at: https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/GeneralPlan.aspx.

The project site has a General Plan land use designation of Intensive Industrial and is located within the MAP SPA, within District 5C (Office/Hotel/Retail/Services District – Central). The project consists of the construction of a new 58,000 square-foot truck dealership and service center. Since 1965, when the first Sacramento County General Plan was adopted, the SPA east of the Sacramento Metropolitan Airport (currently SMF) has been designated for industrial development. This area was analyzed under CEQA in further detail with the adoption of the MAP SPA (refer to the background section below). The MAP SPA is part of the County's General Plan and Zoning Code; therefore, impacts associated with the MAP SPA designations and buildout were evaluated and included in the updated General Plan EIR.

No new impacts peculiar to the project or the parcel on which the project will be located have been identified that would necessitate further environmental review beyond the impacts and issues already disclosed and analyzed in the General Plan Update EIR. No other special circumstances exist that would create a reasonable possibility that the project will have a significant adverse effect on the environment. Therefore, pursuant to CEQA Guidelines Section 15183, no further environmental review is required.

Section 15183 Analysis:

Section 15183(b) specifies that a public agency shall limit its evaluation of environmental effects to those which the agency determines:

1. *Are peculiar to the project or the parcel on which the project would be located.*

   The project site is a vacant, predominantly disturbed site and characterized by non-native annual grasslands. The project includes the construction of a new 58,000-square-foot truck dealership within District 5C of the Metro Air Park (MAP) Special Planning Area (SPA). The facility will sell new and used Class 8 trucks, provide truck maintenance service through 25 service bays, and include a warehouse, will-call area, parts delivery, retail parts store, and a sales office. There are no known environmental effects that are peculiar to the project or the parcel on which the project would be located.

2. *Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent.*

   Construction and operation of the project is not anticipated to result in significant effects which were not analyzed in the General Plan Update EIR.

3. *Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action.*

   Construction of the project does not include off-site impacts and would not result in cumulative impacts which were not analyzed in the General Plan Update EIR.

4. *Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

   There is no substantial new information that would result in a determination of a more severe impact than what had been anticipated by the General Plan Update EIR.

Section 15183(e) further specifies the analysis shall be limited to only those environmental effects for which:

1. *Each public agency with authority to mitigate any of the significant effects on the environment identified in the EIR on the planning or zoning action undertakes or requires others to undertake mitigation measure specified in the EIR which the lead agency found to be feasible, and*

2. *The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.*

   Implementation of the project will undertake all feasible mitigation measures specified in the General Plan Update EIR. Mitigation measures that remain applicable to the project are identified in the attached 15183 General Plan Consistency Checklist.

Julie Newton

Digitally signed by Julie Newton
DN: cn=Julie Newton, o=Sacramento County, ou=Planning and Environmental Review, email=newtonj@saccounty.gov, c=US
Date: 2025.10.02 10:15:30 -07'00'

Julie Newton
ENVIRONMENTAL COORDINATOR OF
SACRAMENTO COUNTY, STATE OF CALIFORNIA

Copy To:

☒ **County Clerk of Sacramento**
County Clerk
3636 American River Drive, Suite 110
Sacramento, CA 95864

☒ **Office of Land Use and Climate Innovation**
State Clearinghouse
1400 10th Street
Sacramento, CA 95814

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APPENDICES

Appendix A: Dudek, Inc., Biological Resources Assessment Report for the Dobbs Peterbilt Truck Center Project, prepared by Laura Burris, April 30, 2025.

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

The direct link is:

https://planningdocuments.saccounty.gov/ViewProjectDetails.aspx?ControlNum=PLNP2024-00234

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
SECTION 15183 GENERAL PLAN CONSISTENCY ANALYSIS

PROJECT INFORMATION

PROJECT TITLE: Dobbs Peterbilt Truck Center

CONTROL NUMBER: PLNP2024-00234

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

PROJECT SPONSOR: Michael A. Orians
WTPE Real Estate Holdings, LLC
2800 136th Avenue, Court E.
Sumner, WA 98390
Jerry@dobbsmanagement.com

LOCATION: The project is located with the Metro Air Park (MAP) at the intersection of Metro Air Parkway and West Elkhorn Boulevard, in the Natomas community of unincorporated Sacramento County.

ASSESSOR'S PARCEL NUMBER: 201-1020-013-0000

GENERAL PLAN DESIGNATION: INT IND – Intensive Industrial

ZONING: SPA – Special Planning Area

PROJECT DESCRIPTION

The project includes the construction of a new 58,000-square-foot truck dealership within District 5C of the Metro Air Park Special Planning Area (SPA). The facility will be located on the southwest corner of the parcel, at the intersection of Bear Paw Drive and West Elkhorn Boulevard. The facility will sell new and used Class 8 trucks, provide truck maintenance service through 25 service bays, and include a warehouse, will-call area, parts delivery, retail parts store, and a sales office. The facility will employ over 70 people within its various departments and the expected hours of operation will be Monday through Friday, 8:00 am to 5:00 pm.

The project will require approval of the following entitlements:

1. A **Use Permit** to allow a Truck Dealership and Service Center in District 5C of the Metro Air Park Special Planning Area (SPA).

2. A **Design Review** to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines).

SURROUNDING LAND USES AND SETTING

The MAP SPA is located in the Natomas community directly east of the Sacramento International Airport (SMF). The area was once predominantly in agricultural production of rice or dry land crops such as wheat. Today, portions of the SPA are developed with distribution centers, parking lots, and backbone infrastructure including roads and utilities. The proposed project is within District 5C (Office/Hotel/Retail/Services – Center) of the MAP SPA. Surrounding land uses immediately to the west is an approximate 800,000 square-foot Amazon distribution facility within District 1 (Light Manufacturing and Distribution District). To the northwest, is a 600,000 square-foot industrial warehouse within District 2 (Airport Manufacturing and Distribution District). The remaining surrounding parcels are undeveloped grasslands within various MAP SPA commercial districts (District 3A - Office - Retail/High Tech/R & D District Core, District 4 - Office/Hotel/Retail Services District - East/West, District 5B - Office/Hotel/Professional Services District – North, and District 5C - Office/Hotel/Retail/Services – Center).

GENERAL PLAN UPDATE EIR

The purpose of the Sacramento County General Plan Update was to establish the framework for development in the unincorporated County that balances environmental protection with community issues such as new growth and housing needs. The General Plan Update included a new growth management strategy, a stronger focus on addressing existing communities, and revitalizing aging corridors. Additionally, the General Plan Update adopted a new Economic Development Element, a Delta Protection Element, and strategies to reduce greenhouse gas emissions consistent with state law. The General Plan Update has a time horizon to 2030.

An EIR was prepared for the Sacramento County General Plan Update (Final EIR; County Control No. 2002-GPB-0105, SCH# 2007082086) and included a comprehensive evaluation of potential environmental impacts that would result from implementation of the General Plan Update. Feasible mitigation measures were included as part of the General Plan Update EIR. The Final EIR was certified by the Board of Supervisors (BOS) on November 9, 2011.

Subsequently, the Sacramento County Climate Action Plan (CAP) was developed to reduce greenhouse gas (GHG) emissions and adapt to the effects of climate change. Furthermore, the CAP provides mechanisms to reduce GHG emissions associated with implementing the Sacramento County General Plan. A Supplemental Environmental Impact Report (SEIR) was prepared for the Sacramento County Climate Action Plan (Final SEIR; County Control No. PLNP2016-00063, SCH# 2023120386) and was certified by the BOS on November 6, 2024.

The GPU Final EIR and CAP Final SEIR are incorporated by reference in accordance with State CEQA Guidelines Section 15150 and available at:

https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/GeneralPlan.aspx

https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx

The above documents are also available for review at Sacramento County Planning and Environmental Review, 827 7th Street, Room 225 Sacramento, CA 95814, during normal business hours.

METRO AIR PARK SPECIAL PLANNING AREA BACKGROUND

Since 1965, when the first Sacramento County General Plan was adopted, the SPA east of the Sacramento Metropolitan Airport (currently SMF) has been designated for industrial development. In 1973, when the General Plan was updated, the SPA site was designated Industrial Extensive and was rezoned from A-10 and AG-20 (agricultural land uses) to M-1 (Light Industrial). At that time, an EIR was filed (Sacramento County Control Number 73-067) identifying significant unavoidable impacts.

In 1982, the Board of Supervisors directed the Sacramento County Planning Department to identify the amount of industrial land which should be retained and nature of airport-related industrial uses. As a result, the Metro Airport/Vicinity SPA (Ordinance No. 83-SPA-3) was adopted on December 6, 1983, effectively replacing the M-1 zoning with the SPA zoning.

In 1989, the Planning Department met with the SPA property owners to formulate a list of airport-compatible land uses. The applicants (SPA property owners) wanted to amend the Metro Airport/Vicinity SPA (the rezone component of the project) to include additional commercial/industrial land uses permitted by right or subject to a use permit, and to remove the requirement for direct access to the Airport's runway(s) and facilities prior to issuance of a building permit for any commercial/industrial land use. The applicants also requested a General Plan amendment from Industrial Extensive to Industrial Intensive, due to the need for intensive uses requiring public sewer and water facilities. The project also proposed to amend the requirement of the General Plan that all development in the industrial areas near the Sacramento Metropolitan Airport be "airport-related", since the proposal developed by the SPA landowners wanted land uses that were not airport related. As a result, three proposals were developed that varied the amount of control the County had over development within the SPA. Proposal C, which was ultimately adopted, was a detailed development proposal prepared by representatives of the SPA property owners. Proposal C proposed adoption of a specific "Land Use Plan", which divided the site into various districts, each with its assigned permitted uses and development standards. The proposal designated areas where specific types of commercial, industrial and recreation/open space uses could occur. An EIR was prepared for The Metropolitan Airport/Vicinity Special Planning Area General Plan Amendment and Rezone (Control Number 89-GPB-ZOB-0781 and State Clearinghouse Number: 92032074) and the FEIR was released in March 1993. The Board of Supervisors certified the Metropolitan Airport/Vicinity Special Planning Area General Plan Amendment and Rezone EIR, with findings that the project would result in significant and unavoidable impacts to air quality, traffic and agricultural resources. In August 1993, the Board of Supervisors approved the project, adopting the specific land uses outlined in Proposal C.

In 1996, the Metro Air Park Association submitted the following requests: (1) a Zoning Ordinance Amendment; (2) a Tentative Subdivision Map; (3) a Boundary Line Adjustment; (4) a Development Plan Review for a golf course; (5) Abandonments of rights-of-way and (6) Adoption of Landscape and Design Guidelines and a Public Facilities Financing Plan. A Supplemental EIR (Control Number 96-ZOB-SDP-BLS-PAP-ABE-0447 and 96-PWE-0284) was prepared to address the potential environmental impacts associated with the above requests.

The project proposed a variety of land use entitlements to allow ultimate development of 1,892± acres within the Metro Air Park site that included a Development Plan Review for an 18-hole golf course and indicated that future industrial, commercial and office uses on the site would undergo Development Plan Review by the County Project Planning Commission. The FSEIR was released in August 1997 and identified significant and unavoidable impacts involving traffic, air quality, and agricultural resources as a result of ultimate buildout of the site. These conclusions were consistent with the findings made in the prior FEIR (89-GPB-ZOB-0781). The FSEIR also identified potentially significant impacts involving airport compatibility, and golf course septic systems; and significant impacts on water quality associated with construction and/or operation of the golf course; however, it was determined that these impacts could be reduced to a less than significant level with mitigation. The project was approved by the Board of Supervisors in February 1998.

In 2021, the Metro Owners Group requested a Zoning Ordinance Amendment to increase the cap on industrial and manufacturing uses from 69 acres to 300, change the maximum permitted acreage for hotel uses from 30 to 40 acres, and update the Circulation Plan to reflect additional secondary roads and realignments. Additionally, minor amendments to signage and landscape standards, and the Transportation Systems Management Plan (TSMP) were requested. An Addendum to the FEIR was prepared for this project (PLNP2021-00114). The Addendum found that neither the proposed requests nor changed circumstance required major revisions to the previous EIR, as there was no involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; therefore, it was concluded that the proposal would not result in any new environmental impacts. On August 23, 2022, the Sacramento County Board of Supervisors recognized the Addendum to the FEIR as adequate and appropriate, and approved the Ordinance to amend the Metro Air Park SPA and Metro Air Park Landscape and Design Guidelines.

The MAP Final EIR is incorporated by reference in accordance with State CEQA Guidelines Section 15150 and available at:

https://sccob.saccounty.gov/Documents/MetroAirPark/SPA_AddendumandPriorFinal-EIR.pdf

§15183 General Plan Consistency Checklist

This checklist provides an analysis of potential environmental impacts resulting from the project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under CEQA Guidelines Section15183.

New Significant Impact indicates the project would result in a new significant impact that was not previously identified in the General Plan Final EIR.

Substantial Increase in Severity of Impact indicates the project would result in a more severe project impact than what had been anticipated in the General Plan Final EIR.

Equal or Less Severity of Impact indicates the project would result in impacts of equal or less severity than what had been anticipated in the General Plan Final EIR.

Where the severity of the impacts of the project would be the same as or less than the severity of the impacts described in the General Plan FEIR, the checkbox for "Equal or Less Severity of

Impact" is checked. Where the checkbox for "Substantial Increase in Severity of Impact" or "New Significant Impact" is checked, there are significant impacts that are:

- Peculiar to the project or project location (CEQA Guidelines Section 15183(b)(1));
- Not analyzed as significant impacts in the previous EIR, including off-site and cumulative impacts (CEQA Guidelines Section 15183(b)(2) and 15183(b)(3)); or
- Due to substantial new information not known at the time the EIR was certified (CEQA Guidelines Sections 15183(b)(4)).

METHODOLOGY

The MAP SPA is an adopted component of both the Sacramento County Zoning Code and the General Plan. The proposed project is consistent with the General Plan Land Use Designation of Intensive Industrial (Int. Ind.). The GPU EIR evaluated the MAP area with the assumption that it would be developed as approved. Therefore, the potential environmental impacts associated with the buildout of the MAP SPA were inherently analyzed as part of the GPU Final EIR.

The following analysis focuses on the project's consistency with the MAP SPA. A determination of consistency with the MPA SPA supports the conclusion that the project is also consistent with the analysis presented in the GPU Final EIR.

An initial review of the project was conducted to assess consistency with the General Plan and the MAP SPA to identify topic areas that require further evaluation based on the project-specific proposal. Based on this review Air Quality, Biological Resources, Hydrology and Water Quality, Noise, and Transportation were the only topic areas identified to require further evaluation. The initial review concluded implementation of the project would result in equal or less severity of an impact without further evaluation for the remaining topic areas including aesthetics, agriculture/forestry, cultural resources, energy, geology/soils, greenhouse gases, hazards and hazardous materials, land use/planning, mineral resources, population/housing, public services, recreation, tribal cultural resources, utilities/service systems, and wildfire.

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

An adopted MAP SPA MMRP is applicable to all projects with the MAP SPA. The MAP Final EIR identified a number of mitigation measures to reduce impacts to less than significant. Some of these measures have been satisfied through incorporation of the measure into the MAP SPA policy document and development standards within the County Zoning Code. Projects are required to comply with mitigation measures as applicable. Some measures may not apply in their entirety to the currently proposed project. In some cases, mitigation language has been updated to reflect site-specific conditions.

MITIGATION MEASURE COMPLIANCE

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

1. It shall be the responsibility of the project applicant to reimburse the County for all expenses incurred in the implementation of the Mitigation Monitoring and Reporting Program (MMRP), including any necessary enforcement actions. The applicant shall pay

an initial deposit of **$1,800**, which includes administrative costs of **$1,097.00**. Over the course of the project, the Division of Planning and Environmental Review will regularly conduct cost accountings and submit invoices to the applicant when the County monitoring costs exceed the initial deposit.

2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

Plate GPC-1: Dobbs Peterbilt Location Map

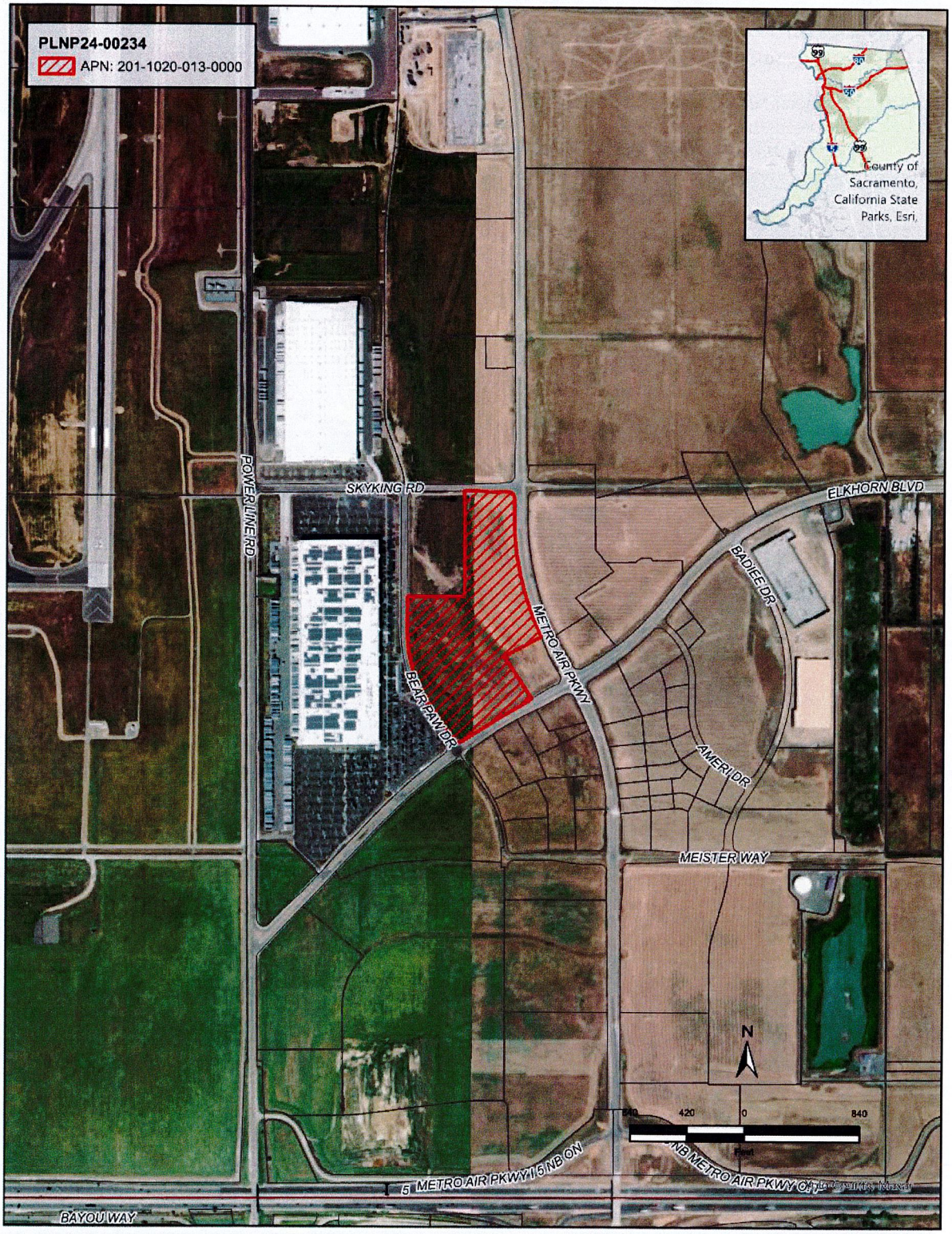


Plate GPC-2: Dobbs Peterbilt Zoning Map

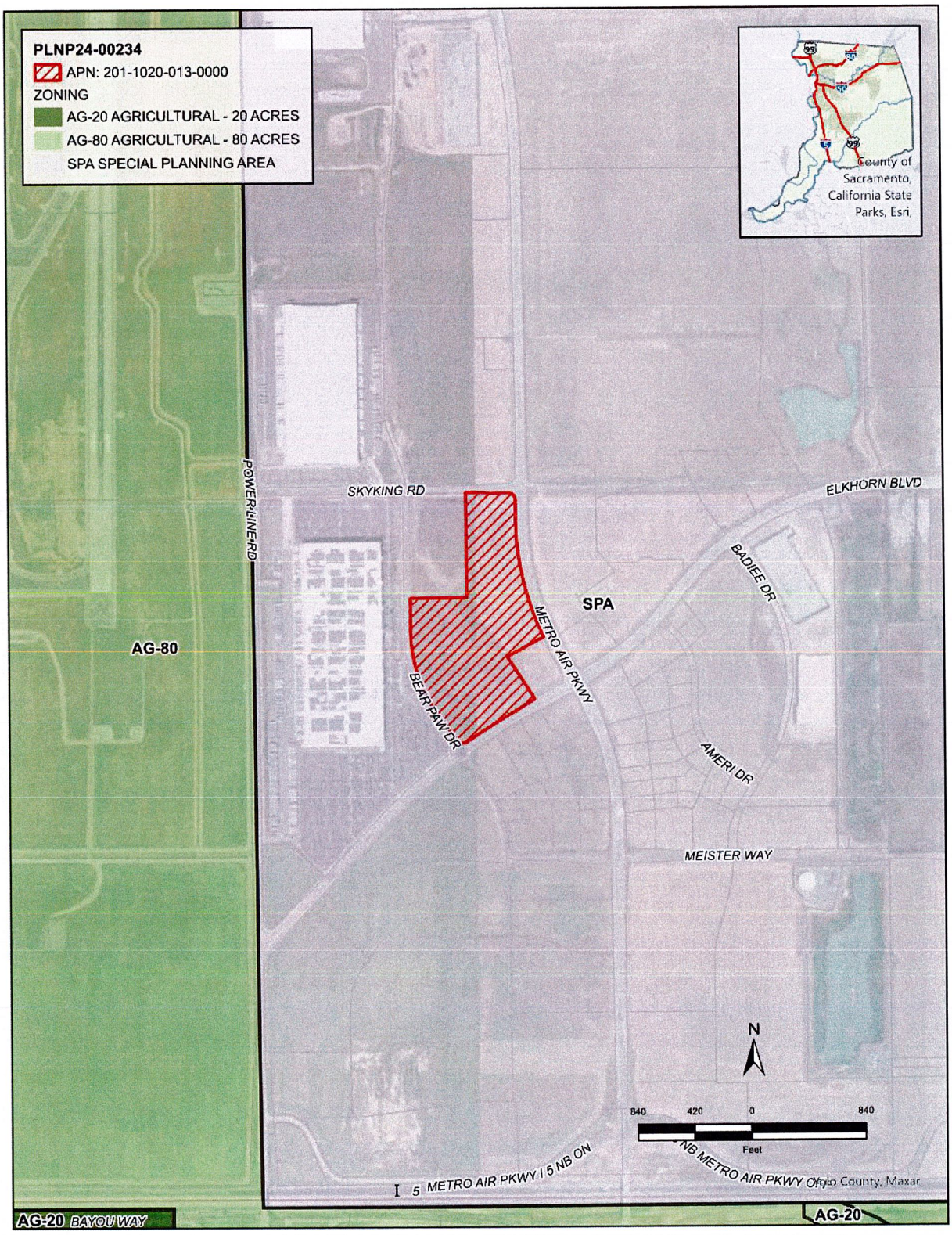
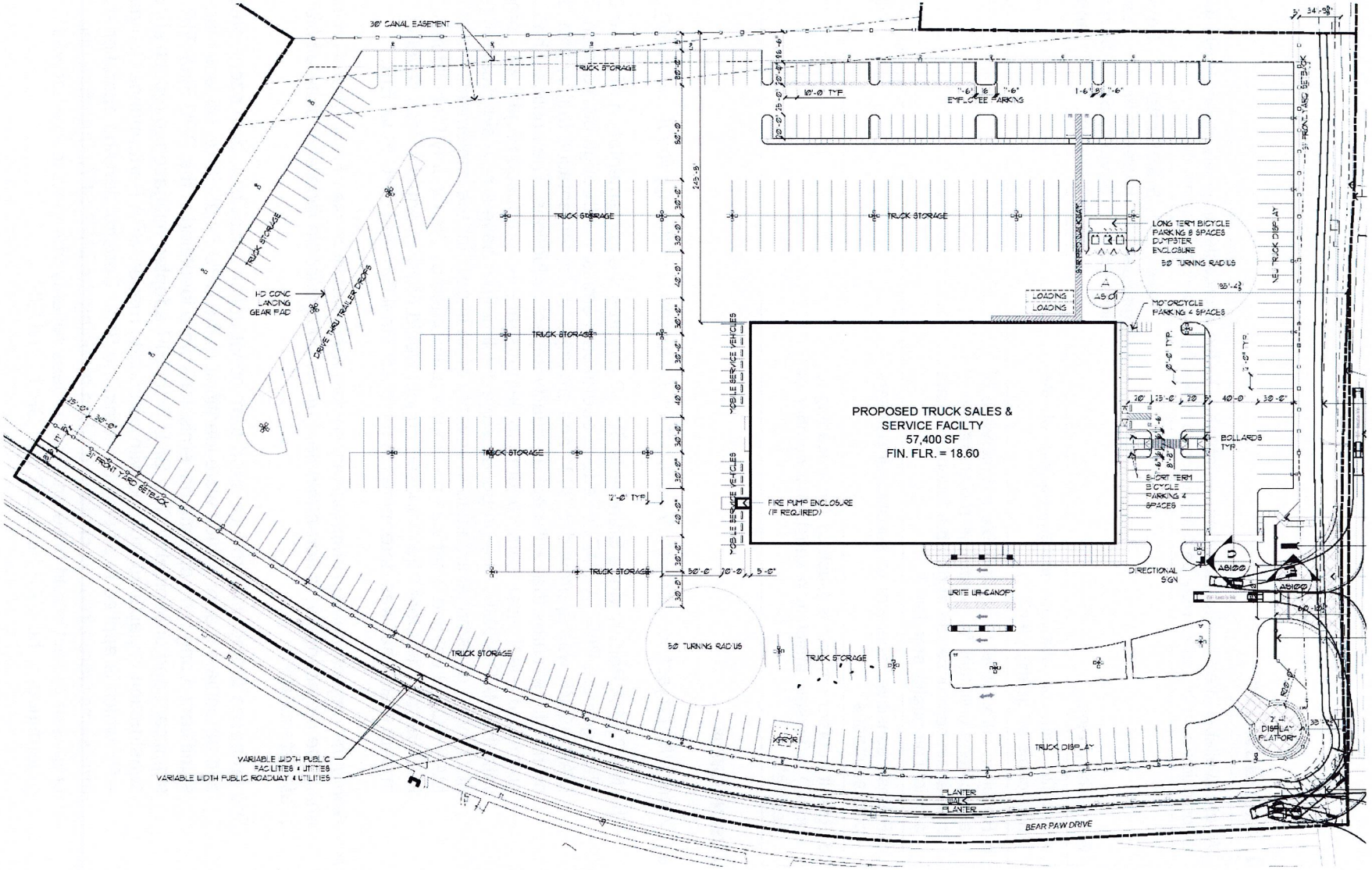


Plate GPC-3: Dobbs Peterbilt Site Plan



I. 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.			
Would the project:	**New Significant Impact**	**Substantial Increase in Severity of Impact**	**Equal or Less Severity of Impact**
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒
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?	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒

DISCUSSION

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

The MAP SPA Performance Standards 5L – P requires the implementation of an Air Quality Management Plan (AQMP)to reduce operational emissions through plan design. The MAP AQMP was approved in 2021 and provides an implementation tool by providing a menu of measures that will meet air quality impact reductions. The applicant has submitted a technical memorandum to demonstrate the proposed project will comply with the MAP AQMP. The proposed project will neither have a new significant impact, nor have a substantial increase in severity of an impact for the implementation of the MAP AQMP beyond what was previously anticipated by the County for buildout of the MAP area. Therefore, the proposed project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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?*

The proposed project will produce short-term construction emissions, both ozone precursors and particulate matter, which were identified in the GPU Final EIR to be less than significant. Long-term operational emissions were identified in the GPU Final EIR to be significant and unavoidable. The GPU Final EIR adopted mitigation to reduce short-term construction impacts associated with particulate matter (SPA Performance Standards 5L – P), which is applied to all projects within the SPA. Construction and operational emissions were already considered when rezoning the MAP SPA; therefore, the proposed project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

The proposed project is not within the vicinity of a sensitive receptor (i.e., schools, nursing homes, hospitals, daycare centers, etc.) and therefore, would not expose any sensitive receptor to substantial pollutant concentrations. The project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

The project will not generate objectionable odors; therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

APPLICABLE MITIGATION MEASURES

No applicable mitigation.

II. BIOLOGICAL RESOURCES

Would the project:	New Significant Impact	Substantial Increase in Severity of Impact	Equal or Less Severity of Impact
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?	☐	☐	☒
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?	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒
d. Interfere substantially with the movement of any 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?	☐	☐	☒
e. Adversely affect or result in the removal of native or landmark trees?	☐	☐	☒
f. Conflict with any local policies or ordinances protecting biological resources?	☐	☐	☒

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?	☐	☐	☒

REGULATORY SETTING

MIGRATORY BIRD TREATY ACT OF 1918

The Migratory Bird Treaty Act of 1918, which states "unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(19) of the Federal Endangered Species Act defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take."

METRO AIR PARK HABITAT CONSERVATION PLAN

The MAP project is contained within the much larger Natomas Basin. The MAP Habitat Conservation Plan (HCP) calls for participation in the multi-species conservation program established under the Natomas Basin Habitat Conservation Plan (NBHCP) to minimize and mitigate the expected loss of habitat values on its 1,892-acre property and on the 123-acre off-site infrastructure improvement area.

The Metropolitan Airport Vicinity Special Planning Area FEIR noted that a draft Habitat Conservation Plan (HCP) was submitted to the regulatory agencies for review and approval; however, since the HCP was not in effect at the time of the FEIR release, the FEIR included mitigation measures to address impacts to Swainson's Hawk and giant garter snake, which are both protected species.

Since the certification of the FEIR and SEIR, a Habitat Conservation Plan (HCP) for the MAP SPA has been approved and is currently being implemented. The HCP covers impacts to 14 species including Giant Garter Snake (species and habitat), Swainson's hawk foraging and nesting habitat, and Valley Elderberry Longhorn Beetle. All development within the SPA must comply with the HCP including compensatory fees and pre-construction species surveys.

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?*

The MAP Final EIR concluded that impacts on sensitive or special status species and plants from development would result in significant but mitigable impacts.

Stantec, Inc. prepared a biological report on April 30, 2025 (Appendix A) for the proposed project and included a list of special status wildlife and plant species. **Table GPC-1** provides a list of the special status plant and wildlife species with potential to occur

based upon the available data from U.S. Fish and Wildlife Services (USFWS) Information for Planning and Consultation (IPaC), and the California Natural Diversity Data Base (CNDDB). The table describes the habitat requirements for each species and makes a determination for the potential of occurrence on the project site.

Table GPC-1: Special-Status Species and Sensitive Habitat

Common Name Scientific Name	Status (Federal/ State/ Other)	Habitat Requirement	Potential to Occur
Birds			
burrowing owl *Athene cunicularia*	BCC/SSC, SCE/ Covered	Nests in small mammal burrows that are in or adjacent to open dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	**Potential to occur.** Ten CNDDB occurrences have been recorded within 5-miles of the Project Area. The closest occurrence (2006) was recorded 1.75 mile to the northwest of the Project Area. No burrows were observed within the Project Area.
Swainson's hawk *Buteo swainsoni*	None/ST/ Covered	Forages in a wide variety of open habitats such as grasslands, open scrub, and agricultural fields. Nests in large, typically riparian trees, but will occasionally utilize ornamental species such as Eucalyptus if they are near the foraging habitat.	**Potential to occur**: Twenty-five (25) CNDDB occurrences have been recorded within 5-miles of the Project Area. The closest occurrence (2010-2016) was recorded 0.6 miles from the Project Area. No trees are present within the Project Area, but mature trees in the project's vicinity provide suitable nesting habitat. No Swainson's hawks were observed within the Project Area
White-tailed Kite *Elanus leucurus*	None/FP/ None	Forages in undisturbed, open grasslands, meadows, farmlands and emergent wetlands. Nests near open foraging areas on top of dense oak, willow, or other tree stand; usually 6-20 m (20-100 ft) above ground.	**Potential to Occur.** No CNDDB occurrence within a 5-mile buffer of the Project Area However, several occurrences outside of the 5-mile buffer. Surrounding trees can provide suitable nesting habitat, and grasslands provide suitable foraging habitat. No nests or White-tailed Kites were observed.
Invertebrates			

Crotch's bumble bee *Bombus crotchii*	None/SCE/ None	Suitable habitat includes areas of grasslands and upland scrub that contain requisite habitat elements, such as small mammal burrows and forage plants. Nests (late February through late October) in underground abandoned small mammal burrows, perennial bunch grasses and/or thatched annual grasses, brush piles, old bird nests, dead trees or hollow logs.	**Potential to Occur.** No CNDDB occurrence within a 5-mile buffer of the Project Area. However, the grasslands and small mammal burrows within the Project Area could provide suitable foraging habitat and nesting habitat, respectively.
Western bumble bee *Bombus occidentalis*	None/SCE/ None	Suitable habitat includes areas of grasslands and upland scrub that contain requisite habitat elements, such as small mammal burrows and forage plants. Nests (late February through late October) in underground abandoned small mammal burrows, perennial bunch grasses and/or thatched annual grasses, brush piles, old bird nests, dead trees or hollow logs.	**Potential to Occur.** No CNDDB occurrence within a 5-mile buffer of the Project Area. However, the grasslands and small mammal burrows could provide suitable foraging habitat and nesting habitat, respectively.
Plants			
dwarf downingia *Downingia pusilla*	None/ None/ 2B.2	Valley and foothill grassland (mesic), Vernal pools/annual herb/Mar–May/5–1,460.	**Not expected to occur**. There are CNDDB occurrences within 5 miles. There are no IPaC or iNaturalist occurrences within 5 miles. The nearest occurrence was in 1997 4.43 miles east of the site. 50 plants were observed in a vernal pool (CNDDB 2025). This species was not observed during the site survey.
Boggs Lake Hedge-hyssop *Gratiola heterosepala*	None/ SE/1B.2	Marshes and swamps (lake margins), Vernal pools; Clay/annual herb/Apr–Aug/35–7,790.	**Not expected to occur**. There are no IPaC or iNaturalist or CNDDB occurrences within 5 miles. There are no known occurrences within 5 miles. The grassland onsite provides marginally suitable habitat and lacks the preferred microhabitat for this species. This species was not observed during the site survey.

Status Key:	California Rare Plant Ranks:
FE = Federal Endangered FT = Federal Threatened FC = Candidate for federal listing ST = State Threatened SSC = California Special Concern Species N/A= CNDDB-designated Special Animal, but no other listing status	2B = Rare, Threatened or Endangered in California, but more common elsewhere .2 = fairly threatened in California

SPECIAL STATUS SPECIES

BURROWING OWL

The burrowing owl is a covered species within the MAP HCP. There are ten occurrences of this species within 5 miles, the closest being approximately 1.75 miles northwest of the project site. At that nearest occurrence, 2 adults and 1 juvenile were observed outside the nesting burrows on June 12, 2006. The project site provides potentially suitable habitat for burrowing owls. Although no suitable burrows were found during the site survey, suitable burrows may become established prior to construction. Therefore, Mitigation Measure BIO-2 has been recommended to ensure there are no suitable burrow habitats prior to the commencement of construction activities. Mitigation Measure BIO-1 is in accordance with the MAP HCP and conforms to the relevant policies outlines within the GPU Final EIR. Therefore, the project will have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

SWAINSON'S HAWK

Swainson's hawk is a covered species under the MAP HCP. There are 25 recorded occurrences within 5 miles of the project site. The nearest recorded occurrence is listed as being approximately 0.6 miles from the project site. That record documents nesting attempts between 2010 and 2016; however, competition from red-tailed hawks was cited as a factor that prevented successful nesting by Swainson's hawk. Although no suitable nesting trees are present within the project site, mature trees in the project vicinity provide suitable nesting habitat for this species. Also, the grassland onsite provides suitable foraging habitat for insects and small mammals that provide prey for Swainson's hawks.

Mitigation Measure BIO-2 addresses potential impacts to nesting hawks and consists of preconstruction surveys. The purpose of the survey requirement is to ensure that construction activities do not agitate nesting hawks, potentially resulting in nest abandonment or other harm to nesting success. If Swainson's hawk nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting hawks remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. Mitigation Measure BIO-2 is consistent with the provisions of the MAP HCP and aligns with applicable GPU Final EIR policies. Therefore, the project will have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

WHITE-TAILED KITE

The white-tailed kite is commonly associated with agricultural areas and inhabits low-elevation grasslands. Review of CNDDB finds there are no records of the white-tailed kite within a 5-mile buffer; however, there are several just outside of the buffer. Eucalyptus trees to the northeast and within the project vicinity may provide suitable nesting habitat for this species and the grassland provides suitable foraging habitat.

Mitigation Measure BIO-2 addresses potential impacts to nesting migratory birds, including white-tailed kite. To avoid take of nesting migratory birds, mitigation has been included either to require that activities occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. The project will have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

CROTCH'S BUMBLE BEE AND WESTERN BUMBLE BEE

Bumblebees have recently been designated as a protected species and were not included within the scope of the MAP HCP at the time of its adoption. There are no CNDDB occurrences for either species within 5 miles of the project site. However, the project site is located within the species' range, and the grassland provides potentially suitable foraging habitat and the species. Also, the species could potentially nest in small mammal burrows within the project site.

Disturbance of food and nectar resources in the nesting season and surface or subsurface disruption of the ground (i.e., tilling, mowing, grazing, and planting) and vegetation removal during nesting and overwintering may negatively impact bumble bees and have the potential to result in take. Surface or subsurface disturbance can negatively affect bumble bee colonies in the spring or overwintering queens in leaf litter and duff.

To protect bumble bee populations, Mitigation Measure BIO-1 has been included that would require that before any soil disturbance or vegetation clearing, a pre-construction survey will be conducted to identify any bumble bee nests on site and determine avoidance. Mitigation will also provide guidance on vegetation removal and soil disturbance strategies and timing, as well as plant genera known to be Crotch's bumble bee food sources to be used during restoration. Impacts to bumblebees would not introduce a new impact and constitute a new analysis; therefore, the project will have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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?*

Since the certification of the MAP Final EIR, the MAP HCP has been approved and implemented for all development within the MAP SPA. The MAP HCP ensures impacts to riparian habitat or other sensitive natural communities are minimized.

The site does not contain any streams, ponds, or riparian habitat. The closest riparian habitat or other sensitive natural community is the Sacramento River, located approximately 2.4 miles southwest of the project site. Therefore, implementation of the

project would not result in impacts greater than what was determined by the MAP Final EIR and GPU Final EIR.

c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The MAP Final EIR concluded that impacts on riparian areas from the buildout of the MAP would be less than significant.

The property has no signs of aquatic resources, including wetlands like vernal pools or seasonal wetlands, marshes, and streams. Therefore, implementation of the project would not result in impacts greater than what was determined by the MAP Final EIR and GPU Final EIR

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

The MAP Final EIR concluded that impacts on migratory birds from the buildout of the MAP would be less than significant with mitigation. Development of the MAP would involve the loss of habitat for potential nesting and foraging for migratory birds.

Although no trees are present within the project site, landscaping trees and shrubs in the project vicinity, along with the on-site grassland habitat, may provide potential nesting habitat for migratory birds. Construction-related activities have the potential to disturb nesting birds if they occur during the breeding season. In order to ensure active nests are not removed or nesting pairs are agitated by site construction, in accordance with The Migratory Bird Treaty Act of 1918, Mitigation Measure BIO-1 requires preconstruction nesting surveys and consultation with the California Department of Fish and Wildlife is recommended. Therefore, implementation of the project would not result in impacts to migratory birds greater than what was determined by the MAP Final EIR and GPU Final EIR.

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

The proposed project does not consist of the removal of native or landmark trees; therefore, the project would have an equal or less severity of impact than what was determined in the GPU Final EIR.

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

Since the certification of the MAP Final EIR, an HCP for the MAP SPA has been approved and is currently under implementation for all development within the MAP. Compliance with the guidelines and requirements of the MAP HCP is required by all developers in MAP and is included as Performance Measure X in the SPA. With the implementation of Mitigation Measures BIO-1 and Performance Measure X, the project is consistent with local policies/ordinances protecting biological resources. The project site is a predominantly disturbed site and characterized by non-native annual grasslands. Mitigation Measures BIO-1 ensures that the potential loss of suitable burrow habitats for burrowing owls, nesting

habitat for Swainson's Hawk and other migratory birds and potential loss of bumble bee nesting habitat are addressed. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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?*

Since the certification of the MAP FEIR and SEIR, an HCP for the MAP SPA has been approved and is currently being implemented. The proposed project site is within the MAP HCP and must comply with the HCP, including pre-construction species surveys. With the implementation of Mitigation Measures BIO-1 and Performance Measure X, the project is consistent with the MAP HCP. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

APPLICABLE MITIGATION MEASURES

MITIGATION MEASURE BIO-1: BUMBLEBEE NEST SURVEY AND HABITAT

To avoid impacts on bumble bees the following shall apply:

1. **Nest Survey:** A qualified biologist with education and experience in bumble bee nests and identification, shall conduct a nest survey if construction is to occur between March and September.

If a nest is present, then the qualified biologist shall submit an avoidance plan to CDFW for review and approval. If no nests are found, no further mitigation is necessary.

2. **Vegetation Removal:** Where feasible, protect patchwork areas of land from surface disturbance. Habitats to protect and avoid include fence margins, hedgerows, ditches, and residential gardens If vegetation removal and/or mowing needs to be carried out during the bumble bee flight season (March-September), leaving patches with structurally different vegetation.

3. **Soil Disturbance:** To the extent feasible, time the initial soil disturbance, vegetation removal and/or mowing, to occur outside of the overwintering period (March-September). If these actions are conducted during the overwintering period, use highest cutting height possible to prevent disturbance of established nests or overwintering queens.

   To the extent feasible, retain landscape features with rodent burrows, such as the ground squirrel colonies.

4. **Site Restoration:** A site restoration plan will be submitted to the Environmental Coordinator, prior to the start of construction. After construction, restore floral resources in areas of temporary disturbance by including native bumble bee food plants in planting palettes. Plants of the following genera are appropriate for Crotch bumble bee: *Antirrhinum, Asclepias, Phacelia, Chaenactis, Clarkia, Dendromecon, Eriogonum, Eschscholzia, Lupinus, Medicago, and Salvia*.

MITIGATION MEASURE BIO-2: COMPLIANCE WITH THE MAP HCP

All development within the SPA must comply with the MAP HCP including compensatory fees and pre-construction species surveys. Compliance with the guidelines and requirements of the MAP HCP is required by all developers in the MAP and is included as Performance Measure X in the SPA.

III. HYDROLOGY AND WATER QUALITY

Would the project:	New Significant Impact	Substantial Increase in Severity of Impact	Equal or Less Severity of Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			
i. result in a substantial erosion or siltation on- or off-site;	☐	☐	☒
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒
iv. impede or redirect flood flows?	☐	☐	☒
d. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?	☐	☐	☒
e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒
f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒

DISCUSSION

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

The GPU Final EIR concluded that industrial development would result in no impacts or be mitigated to less than significant. This is because compliance with the adopted MAP SPA Drainage Master Plan, included as Performance Measure 2 in the SPA, and the County's Floodplain Management Ordinance would ensure water quality impacts remain minimal. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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?*

The GPU Final EIR concluded that compliance with existing Drainage Master Plans for any planned communities would result in no impact or be mitigated to less than significant. The General Plan was updated to incorporate the MAP SPA designations; therefore, impacts associated with the MAP SPA were evaluated as part of the updated General Plan EIR.

The Metro Air Park SPA has an approved Drainage Master Plan[1], which identifies water movement and management within the SPA in the post-development environment. The approved Drainage Master Plan ensures that stormwater is adequately managed and will not affect adjacent properties. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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;*

The proposed project would not alter the course of a water body, nor would it alter the existing site drainage pattern. Nearby hydrological features include man-made canals and ditches to the west and north of the project site, remnants of former agricultural and stormwater systems that discharge into the Sacramento River. The site drainage is not expected to result in substantial on or off-site siltation or erosion. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

The GPU Final EIR concluded that compliance with Floodplain Management Ordinance would result in no impact or be mitigated to less than significant.

[1] Metro Air Park Master Drainage Study, Final 2002, prepared by Water Mark Engineering.

The project does not involve any modifications that would substantially alter the existing drainage pattern and/or increase the rate or amount of surface runoff in a manner that would lead to flooding.

Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that the project would not result in impacts to surface runoff greater than what was determined by the MAP Final EIR and GPU Final EIR.

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*

The GPU Final EIR concluded that compliance with existing Drainage Master Plans for any planned communities would result in no impact or be mitigated to less than significant.

The project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems. The MAP SPA has an approved Drainage Master Plan that delineates the movement and management of stormwater within the SPA. All development must be consistent with the MAP Drainage Master Plan; therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

iv. *impede or redirect flood flows?*

The GPU Final EIR concluded that compliance with existing Drainage Master Plans for any planned communities would result in no impact or be mitigated to less than significant.

The project is located within the Natomas Basin and is located within a Federal Emergency Management Act (FEMA) Flood Insurance Rate Map (FIRM) flood zone A-99. The Metro Air Park SPA approved Drainage Master Plan ensures runoff will not impede or redirect flood flows. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

The GPU Final EIR concluded that compliance with existing Drainage Master Plans for any planned communities and compliance with the Floodplain Management Ordinance would result in no impact or be mitigated to less than significant.

The project is located in an area subject to 200-year urban levels of flood protection (ULOP) – levee protected within the Natomas Basin. Flood events could inundate the project site and release sediment or other pollutants.

In 2007, SAFCA commenced the Natomas Levee Improvement Program (NLIP) to meet the 200-year flood protection standard. The NLIP project improved levees on the north

perimeter and a portion of the west perimeter of the Natomas Basin. SAFCA completed NLIP construction in 2016. The American River Common Features Natomas Basin Project is improving the basin's remaining west, east and south levees and is expected to be completed by 2025.

The completion of the NLIP project and the progress toward expected completion of the American River Common Features Natomas Basin Project in 2025 will reduce the potential for flooding that will result in flood protection equal to or greater than the ULOP in urban or urbanizing areas by 2025. Project within the MAP SPA would include drainage improvements to efficiently route stormwater to treatment and infiltration BMPs, which would reduce the potential to release sediment and other pollutants. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

The Pacific Ocean is approximately 118 miles to the west; therefore, there would not be a risk of tsunami. There are no large bodies of water near the project site that would result in seiche hazards nor is the project region subjected to strong seismic ground shaking. Therefore, the proposed project would not risk the release of pollution due to project inundation and the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

The GPU Final EIR concluded that compliance with existing Drainage Master Plans for any planned communities and compliance with the Floodplain Management Ordinance would result in no impact or be mitigated to less than significant.

The proposed project would be consistent with the adopted Metro Air Park SPA Drainage Master Plan and would not conflict with or obstruct implementation of the regional Basin Plan. Therefore, implementation of the project would not result in impacts greater than what was determined by the MAP Final EIR and GPU Final EIR.

APPLICABLE MITIGATION MEASURES

No applicable mitigation.

IV. NOISE

Would the project:	New Significant Impact	Substantial Increase in Severity of Impact	Equal or Less Severity of Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒

b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒

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?*

The MAP Final EIR concluded that construction related noise impacts from the buildout of the MAP would be less than significant, given the temporary nature of these activities. As noise barriers (structures) are developed within the MAP SPA, the area affected by construction noise will decrease. Mitigation Measure N-1 addresses potential impacts to interior noise levels for commercial structures through the incorporation of specific design measures.

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

Also, the anticipated increase in truck traffic within the project site vicinity is not expected to result in significant noise impacts. The nearest sensitive rector, comprising of residential uses located approximately 0.7 miles west of the project site, is at a sufficient distance to avoid adverse exposure to noise levels.

Therefore, implementation of the project would not result in impacts greater than what was determined by the MAP Final EIR and GPU Final EIR.

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

The MAP Final EIR concluded that construction related noise impacts from the buildout of the MAP would be less than significant, given the temporary nature of these activities. During the later stages of construction, materials handling and small stationary noise sources produce lower noise levels with smaller impact zones. Equipment such as cement rucks, forklifts, compressors, and pumps typically have noise levels attenuated to acceptable limits within 500 feet. Small, mobile sources like generators can be effectively controlled using heavy-duty mufflers and strategically placed near barriers to further reduce noise impacts. The nearest sensitive receptor (residential homes) is approximately 0.7 miles west of the project site. Therefore, implementation of the project would not result in impacts greater than what was determined by the MAP Final EIR and GPU Final EIR.

APPLICABLE MITIGATION MEASURES

No applicable mitigation.

V. TRANSPORTATION

Would the project:	New Significant Impact	Substantial Increase in Severity of Impact	Equal or Less Severity of Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒

DISCUSSION

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

The MAP Final EIR adopted the Transportation Systems Management Plan (TSMP) to reduce employee trips. The TSMP includes construction of transit stops, dedication of land for future light rail, zero emission SPA-wide shuttles, employee transit subsidies, bike share programs, end of trip facilities (bike racks/lockers and showers), and connected pathways. SPA Performance Standards 5 G and H requires the implementation of the TSMP as part of the project; therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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?*

The MAP Final EIR was released prior to July 2020 when the CEQA Guidelines were updated to shift the analysis for transportation impacts from Level of Service (LOS) to Vehicle Miles Traveled (VMT). Prior case law in California has uniformly concluded that projects subject to supplemental review under CEQA did not need to address new subject matters, even though the prior EIR being updated did not address the new subject matter (greenhouse gases for these cases). (Reference Citizens for Responsible Equitable Environmental Development v. City of San Diego (2011) 196 Cal.App.4th 525, 530-532; Citizens Against Airport Pollution v. City of San Jose (2014) 227 Cal.App4th 788, 806-808; see also CEQA Guidelines Section 15007(b)(c).) This case law can apply to VMT analysis as the CEQA Guidelines expressly states that it (VMT analysis) "shall apply prospectively as described in Section 15007." If a document meets the requirements in effect at the time of public review, the document does not need to conform to any new content. Therefore, no additional VMT analysis was completed for

the project as the Final EIR was released well before VMT was adopted as a metric for analysis requirements.

The MAP Final EIR evaluated traffic-related impacts associated with future development within the MAP. Traffic and circulation impacts were identified to be significant and unavoidable. Performance Standards 5A - H of the SPA address potential impacts to transportation and circulation through the implementation of the TSMP, requiring roadway and intersection improvements, and participation of the project's fair share contribution. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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)?*

The project does not add dangerous curves, introduce transportation facilities where there is inadequate site distance, or otherwise increases any hazards. Performance Standards 5A - H of the SPA address potential impacts to transportation and circulation through the implementation of the TSMP, requiring roadway and intersection improvements, and participation of the project's fair share contribution. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

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

New development within the County requires adequate fire access roadways for all emergency responders. Compliance with Sac Metro requirements will ensure that the project would not result in inadequate emergency access. Therefore, the project would have an equal or less severity of impact than what was determined in the MAP Final EIR and GPU Final EIR.

APPLICABLE MITIGATION MEASURES

No applicable mitigation.

ENVIRONMENTAL DETERMINATION

As demonstrated by the analysis herein, implementation of the project would not result in any new additional significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all the impacts associated with the project are found to be within the scope of impacts previously addressed and disclosed in the certified General Plan Update EIR and MAP SPA EIR, and do not constitute a new or substantially increased significant impact. Based on this determination and pursuant to the CEQA Guidelines Section 15183, the project qualifies for an exemption.

LIST OF PREPARERS

LEAD AGENCY

Environmental Coordinator	Julie Newton
Senior Planner	Michelle Nagao
Assistant Planner	Hukum Sekhon
Office Manager	Kim Reading
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APPENDIX A (PROVIDED UNDER SEPARATE COVER)

Biological Resources Assessment Report for the Dobbs Peterbilt Truck Center Project