

Airport South Industrial Project

SCH# 2022030181

Draft Environmental Impact Report

Prepared for
Sacramento Local Agency Formation Commission
&
City of Sacramento
Community Development Department



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Prepared by



Airport South Industrial Project Draft Environmental Impact Report

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1. INTRODUCTION

1. INTRODUCTION

1.1 TYPE AND PURPOSE OF THE EIR

The Airport South Industrial Project Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970, Public Resources Code (PRC) Sections 21000-21189.91, as amended, and the Guidelines for Implementation of the California Environmental Quality Act, California Code of Regulations (CCR) Title 14, Sections 15000-15387 (CEQA Guidelines). The City of Sacramento (City) and the Sacramento Local Agency Formation Commission (LAFCo) are both Lead Agencies for the environmental review of the Airport South Industrial Project (proposed project) evaluated herein and each have principal responsibility for approving certain aspects of the project.

Because LAFCo must act first on a Sphere of Influence (SOI) Amendment request by the City, under CEQA Guidelines Section 15051, subdivision (c), LAFCo is the Lead Agency for that action. Should LAFCo approve that request, the City may then consider Rezoning for the project site, as well as other related development entitlements for the project, which are discussed more fully in Section 1.3, Project Summary, of this chapter. Under CEQA Guidelines Section 15051, subdivision (b)(2), the City is the Lead Agency for the action for Rezoning and other related development entitlements for the proposed project. Pursuant to CEQA Guidelines Section 15051, subdivision (d), LAFCo and the City entered into an agreement that provides for “cooperative efforts” and “a joint exercise of powers,” in order to comply with the requirements of CEQA for lead agencies to consider the “whole of the action” (CEQA Guidelines Section 15003[h]), avoid duplicative efforts, and provide a clear point of contact for the public and interested public agencies to ask questions and provide comments on this EIR.

As required by Section 15121 of the CEQA Guidelines, this EIR will (a) inform public agency decision-makers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects. The public agencies shall consider the information in the EIR along with other information that may be presented to the agencies.

As provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social issues. CEQA requires the preparation of an EIR prior to approving any project that may have a significant effect on the environment. For the purposes of CEQA, the term *project* refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the proposed project, the City and LAFCo have determined that the proposed development is a *project* within the definition of CEQA, which has the potential for resulting in significant environmental effects.

The lead agencies, which, for this project, are both the City of Sacramento and the Sacramento LAFCo, are required to consider the information in the EIR along with any other available



information in deciding whether to approve the application. The basic requirements for an EIR include discussions of the environmental setting, environmental impacts, mitigation measures, alternatives, growth inducing impacts, and cumulative impacts.

The CEQA Guidelines identify several types of EIRs and associated titles. As explained in *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1047-1048 (*Treasure Island*), courts strive to avoid attaching too much significance to titles in ascertaining whether a legally adequate EIR has been prepared for a particular project. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR. This EIR includes both programmatic and project-level analyses, as appropriate for the level of information available for each entitlement request. For example, because the proposed project would not include any development of the nonparticipating parcels at this time, this EIR includes a *program-level* analysis of the environmental impacts associated with the proposed entitlements for the nonparticipating parcels, pursuant to CEQA Guidelines Section 15168. With respect to the development of the remainder of the project site, the project applicant has submitted project-specific information, allowing for a *project-level* analysis of the potential environmental impacts that would result from such development, pursuant to CEQA Guidelines Section 15161.

1.2 KNOWN RESPONSIBLE AND TRUSTEE AGENCIES

“Responsible agency” means a public agency that proposes to carry out or approve a project for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For the purpose of CEQA, the term responsible agency includes all California public agencies other than the lead agencies that have discretionary approval power over the project or an aspect of the project. The Sacramento Metropolitan Air Quality Management District (SMAQMD) and the Central Valley Regional Water Quality Control Board (RWQCB) are identified as potential responsible agencies for the proposed project.

“Trustee agency” means a State agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California. The only known trustee agency is the California Department of Fish and Wildlife (CDFW).

Although not subject to California law, and, thus, outside the definitions of responsible agency or trustee agency, the U.S. Army Corps of Engineers (USACE) and U.S. Fish and Wildlife Service (USFWS) would also be called upon to grant approvals — under federal law — necessary for the development of the project site. The above agencies do not have duties under CEQA, but, rather, are governed by a variety of federal statutes, such as the Clean Water Act, which governs the dredging and filling of waters of the U.S. (e.g., wetlands), and the Endangered Species Act, which requires USACE to consult with the USFWS as part of the review process for any wetland or fill permits that may be required. The aforementioned federal agencies will exercise their permitting authority in compliance with the National Environmental Policy Act (NEPA).

1.3 PROJECT SUMMARY

The project site is located southeast of the intersection of Power Line Road and Interstate 5 (I-5) in Sacramento County, California. The 474.4-acre project site is undeveloped and consists entirely of agricultural land. The project site is bound by I-5 to the north, the City of Sacramento boundary to the east, the West Drainage Canal to the south, and Power Line Road to the west.



Surrounding existing land uses include the Life Storage Facility and Westlake residential subdivision to the east; undeveloped agricultural land and the Paso Verde School to the south; currently undeveloped Sacramento International Airport Master Plan Commercial Development to the west; the Sacramento International Airport to the northwest, across I-5; the Metro Air Park and the Amazon SMF-1 Fulfillment Center to the north, across I-5; and the currently under-construction Northlake subdivision to the northeast, across I-5.

The project site is currently situated adjacent to, but outside of, the City's SOI. In addition, the project site is located outside of the Sacramento Area Sewer District (SacSewer) SOI. Prior to the commencement of construction, the proposed project would require approval by Sacramento LAFCo of a SOI Amendment to amend the City's SOI and SacSewer's SOI to include the project site. Following the project site's inclusion within the City's SOI, the project site would be eligible for annexation into the City limits. In accordance with the Cortese-Knox-Hertzberg Local Government Reorganization Act (see Government Code Section 56375), rezoning would be applied to the annexation area prior to LAFCo's consideration of the annexation.

While the entire project site is proposed for annexation into the City limits, only a 353.5-acre portion of the project site is currently proposed for development as part of requested entitlements. If the annexation is approved, the proposed project would include development of an industrial park that would allow for construction of up to 5,204,500 square feet (sf) of industrial uses within five parcels totaling 235.6 acres, as well as approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality uses, on approximately 13.4 acres of the overall site. Parcels 6A through 6C and 7A through 7C are proposed retail/highway commercial uses generally situated south of the intersection of I-5 and Metro Air Parkway.

The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. The proposed project would result in first-tier entitlements for future industrial uses of approximately 1,404,800 sf within the nonparticipating parcels. The nonparticipating parcels include five existing parcels controlled by separate owners, which are summarized as follows:

- Parcel 8: 64.3 acres (Cayocca);
- Parcel 9: 6.5 acres (Campbell);
- Parcel 10: 4.6 acres (Isgur Trust); and
- Parcel 11: 0.7-acre (Patel).

In addition, the nonparticipating parcels include 6.9 acres of California Department of Transportation (Caltrans) Remnant right-of-way (ROW). The project site also includes 37.9 acres of Caltrans I-5 fee title ROW, which would not be developed as part of the proposed project. Finally, the proposed project would require construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch SacSewer North Natomas interceptor line in East Commerce Way.

Sacramento LAFCo and the City of Sacramento have discretionary authority and are each a lead agency for their respective components of the proposed project. In addition to certification of this EIR and the associated Mitigation Monitoring and Reporting Program, the proposed project requires approval of the following by Sacramento LAFCo:

- SOI Amendment to include the project site within the City of Sacramento SOI and the SacSewer SOI; and



- Annexation of the project site into the Sacramento City limits and SacSewer service area and associated detachment from various service providers, such as the Natomas Fire Protection District, Sacramento County Water Agency Zone 13, and County Service Area (CSA) 1.

The proposed project requires approval of the following by the City of Sacramento:

- General Plan Amendment (GPA) of the City of Sacramento 2040 General Plan to include the boundaries of the industrial park footprint and nonparticipating parcels (total of 414.3 acres – not including roadways) as Employment – Mixed Use;
- Rezoning of 317.9 acres (not including roadways) of the project site to Industrial Planned Unit Development (M-1-PUD), 13.4 acres (not including roadways) of the site to Highway Commercial PUD (HC-PUD), and 83 acres of the site to Industrial (M-1);
- PUD (Schematic Plan and PUD Guidelines)
- Tentative Master Parcel Map;
- Development Agreement;
- Public Facilities Finance Plan; and
- Property Tax Exchange Agreement (between the City and the County of Sacramento).

Please refer to Chapter 3, Project Description, of this EIR for a detailed description of the proposed project and approvals, as well as a full list of the project objectives.

1.4 EIR PROCESS

The EIR process begins with the decision by the lead agencies to prepare an EIR, either during a preliminary review of a project or at the conclusion of an Initial Study. Once the decision is made to prepare an EIR, the lead agencies send a Notice of Preparation (NOP) to appropriate government agencies and, when required, to the State Clearinghouse (SCH) in the Office of Planning and Research (OPR), which will ensure that responsible and trustee State agencies reply within the required time. The SCH assigns an identification number to the project, which then becomes the identification number for all subsequent environmental documents on the project (in this case #2022030181). Commenting agencies have 30 days to respond to the NOP and provide information regarding alternatives and mitigation measures they wish to have explored in the Draft EIR and to provide notification regarding whether the agencies will be a responsible agency or a trustee agency for the project. A scoping meeting to discuss these issues may be held.

Upon completion of the Draft EIR and prior to circulation to State and local agencies and interested members of the public, a notice of completion is filed with the SCH and a public notice of availability is published to inform interested parties that a Draft EIR is available for agency and public review. In addition, the notice provides information regarding the location where copies of the Draft EIR are available for public review and any public meetings or hearings that are scheduled. The Draft EIR is circulated for a minimum period of 45 days, during which time reviewers may submit comments on the document to the lead agencies. The lead agencies must respond to comments received during the comment period in writing. If significant new information, as defined in CEQA Guidelines Section 15088.5, is added to an EIR after public notice of availability is given, but before certification of the EIR, the revised EIR or affected chapters must be recirculated for an additional public review period with related comments and responses.



A Final EIR will be prepared, containing public comments on the Draft EIR and written responses to those comments, as well as a list of any changes to the Draft EIR text made in response to public comments. Before approving a project, the lead agencies shall certify that the EIR (consisting of the Draft EIR and Final EIR) has been completed in compliance with CEQA, and that the EIR has been presented to the decision-making bodies of the lead agencies, which have reviewed and considered the EIR. The lead agencies shall also certify that the EIR reflects the lead agencies' independent judgment and analyses.

The findings prepared by the lead agencies must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. If the decision-making body elects to proceed with a project that would have unavoidable significant impacts, a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must be prepared.

1.5 SCOPE OF THE EIR

This EIR constitutes a project-level analysis for a portion of the proposed project and, pursuant to CEQA Guidelines Section 15161, covers "all phases of the project including planning, construction, and operation." As noted in Chapter 3, Project Description, of this EIR, certain portions of the project are not receiving development permits, and the analysis for those parcels is at a programmatic level. The sections of the CEQA Guidelines Appendix G Checklist identified for study in this EIR include the following:

- Aesthetics;
- Agricultural Resources;
- Air Quality, Greenhouse Gas Emissions, and Energy;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning/Population and Housing;
- Noise;
- Public Services, Utilities, and Service Systems;
- Transportation;
- Tribal Cultural Resources;
- Effects Not Found to be Significant;
- Statutorily Required Sections; and
- Alternatives Analysis.

The evaluation of effects is presented on a resource-by-resource basis in Chapters 4.1 through 4.13 of the EIR. Each chapter is divided into the following four sections: Introduction, Existing Environmental Setting, Regulatory Context, and Impacts and Mitigation Measures. Impacts that are determined to be significant in Chapters 4.1 through 4.13, and for which feasible mitigation measures are not available to reduce those impacts to a less-than-significant level, are identified as significant and unavoidable. Chapter 5 discusses the CEQA impact areas for which the proposed project would not result in a significant impact. Chapter 6 presents a discussion of growth-inducing impacts, a summary of cumulative impacts, and significant irreversible as well as



significant and unavoidable environmental changes associated with the project. Alternatives to the proposed project are discussed in Chapter 7 of the EIR.

1.6 DEFINITION OF BASELINE

According to CEQA Guidelines Section 15125, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project to provide the “baseline physical conditions” against which project-related changes could be compared. In addition, CEQA Guidelines Section 15126.2(a) states that an EIR shall identify and focus on the significant environmental effects of the proposed project. The CEQA Guidelines, Section 15126.2(a), states in pertinent part:

An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.

The baseline condition for this EIR is the physical condition that exists when the NOP is published. The NOP for the proposed project was published on March 4, 2022. Therefore, conditions existing at that time are considered to be the baseline against which changes that would result from the proposed project are evaluated. Impacts could include both direct and indirect physical changes to the baseline condition, as well as cumulative effects. The baseline condition for the proposed project site is described in Chapter 3, Project Description, of this EIR. The baseline conditions pertaining to each resource area are described in the “Existing Environmental Setting” section of the respective chapters of this EIR.

According to CEQA Guidelines Section 15125(d), the EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. An “applicable” plan is a plan that has already been adopted and, thus, legally applies to a project; draft plans need not be evaluated.¹ Since the NOP was circulated for public review, the City adopted the 2040 General Plan on February 27, 2024. However, at the time of the NOP, the adopted General Plan for the City was the 2035 General Plan. Nonetheless, the analysis of this EIR has been updated to reflect the 2040 General Plan.

1.7 NOTICE OF PREPARATION AND SCOPING

In accordance with CEQA Guidelines Section 15082, a NOP (see Appendix A of this EIR) was circulated to the public, local, State and federal agencies, and other known interested parties for a 30-day public and agency review period from March 4, 2022 to April 4, 2022. The purpose of the NOP was to provide notification that an EIR for the proposed project would be prepared and to solicit public input on the scope and content of the document.

Pursuant to CEQA Guidelines Section 15082, Sacramento LAFCo and the City of Sacramento held an NOP scoping meeting during the 30-day review period, on March 16, 2022, for the purpose of receiving comments on the scope of the environmental analysis to be prepared for the proposed project. Agencies and members of the public were invited to attend and provide input on the scope of the EIR.

¹ Stephen L. Kostka and Michael H. Zischke. *Practice Under the California Environmental Quality Act, Volume 1*. Continuing Education of the Bar: March 2022, Section 12.27.



1.8 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

During the NOP public review period from March 4, 2022 to April 4, 2022, the City of Sacramento received 19 comment letters. Verbal comments were not received at the public scoping meeting held on March 16, 2022. A copy of each letter is provided in Appendix B of this EIR. The comment letters received during the NOP public review period were authored by the following representatives of public agencies and groups, as well as individual members of the general public:

Agencies

- Native American Heritage Commission – Pricilla Torres-Fuentes;
- Pacific Gas and Electric Company – Plan Review Team;
- Sacramento Regional County Sanitation District – Robb Armstrong (3/28/22);
- Sacramento Regional County Sanitation District – Robb Armstrong (3/30/22);
- Airport Land Use Commission – Greg Chew;
- Sacramento Metropolitan Air Quality Management District – Molly Wright;
- Sacramento Regional Transit District – Kevin Schroder;
- California Department of Transportation – Gary Arnold;
- California Department of Fish and Wildlife – Kelley Barker;
- County of Sacramento – Todd Smith; and
- Central Valley Regional Water Quality Control Board – Greg Hendricks.

Groups

- United Auburn Indian Community – Anna Starkey;
- Inland Empire Biking Alliance – Marven E. Norman; and
- Environmental Council of Sacramento (ECOS), Habitat 2020, Friends of the Swainson's Hawk, Sierra Club, Sacramento Audubon Society – Susan Herre, Barbara Leary, James P. Pacht, Judith L. Lamare, Sean Wirth, and William Bianco.

Individuals

- Jeffrey P. Phillips;
- Jan Schori;
- Nick Zuvela;
- Brian Thornton; and
- Archana Maniar.

The following list, categorized by issue, summarizes the concerns brought forth in the comment letters and verbal comments received on the scope of the EIR:

| | |
|--|---|
| Aesthetics | Concerns related to: <ul style="list-style-type: none"> • Increase in light pollution on nearby residential areas. |
| Agricultural Resources | Concerns related to: <ul style="list-style-type: none"> • Conversion of agricultural land to other uses. |
| Air Quality, Greenhouse Gas Emissions, and Energy | Concerns related to: <ul style="list-style-type: none"> • Construction and operational emissions of criteria pollutants and GHG emissions. • Health concerns related to truck traffic/truck emissions. • Consistency with the Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS). |



| | |
|--|--|
| | <ul style="list-style-type: none"> Proximity of emission sources to sensitive receptors. |
| Biological Resources | <p>Concerns related to:</p> <ul style="list-style-type: none"> Loss of plant and wildlife habitat. Lighting, noise, and wildlife-human interactions. Interference in migratory wildlife corridors. Compliance with local conservation plans. Potential removal of wetlands or protected plants and animals. |
| Hazards and Hazardous Materials | <p>Concerns related to:</p> <ul style="list-style-type: none"> Use of hazardous materials, such as rodenticides. |
| Hydrology and Water Quality | <p>Concerns related to:</p> <ul style="list-style-type: none"> Impacts to Caltrans drainage facilities. Degradation of water quality in area waterways. Compliance with RWQCB regulations. Sufficiency of stormwater management on the project site. Increased and/or exacerbation of flood hazard due to changes in drainage patterns. |
| Land Use and Planning/Population and Housing | <p>Concerns related to:</p> <ul style="list-style-type: none"> Potential incompatibility with the surrounding land uses. Project consistency with LAFCo and City Sphere of Influence Amendment procedures. Consistency with the City and County General Plans. Consistency with the Airport Land Use Compatibility Plan. |
| Noise | <p>Concerns related to:</p> <ul style="list-style-type: none"> Increase in noise levels to nearby residential areas. Impacts on the project site related to the airport and freeway noise. |
| Public Services, Utilities, and Service Systems | <p>Concerns related to:</p> <ul style="list-style-type: none"> Annexing into the Regional Sanitation and Sacramento Area Sewer District service area. Supply and capacity of water and wastewater facilities. Compliance with PG&E requirements when establishing utility connections. Impacts from construction of necessary utility infrastructure, including electric and wastewater. |
| Transportation | <p>Concerns related to:</p> <ul style="list-style-type: none"> Traffic increases in the project vicinity. Increased traffic delays and congestion during commute hours. Cumulative traffic impacts on the local and regional transportation system. Impacts to specific County facilities. Biking level-of-traffic stress. Hazards for cyclists associated with increased truck traffic. Pedestrian and bicycle infrastructure to allow access to a planned SacRT light rail station. Pedestrian safety. Potential cumulative impacts in combination with the Metro Air Park. Compliance with standards and regulations regarding access roadways. |



| | |
|--------------------------------------|--|
| | <ul style="list-style-type: none"> • Approval of an encroachment permit to work in the State's Right of Way. • A potential need for new infrastructure to support the increase in traffic. |
| Tribal Cultural Resources | Concerns related to: <ul style="list-style-type: none"> • Potential for encountering previously unknown tribal resources at the project site. • Proper consultation with Native American tribes. |
| Statutorily Required Sections | Concerns related to: <ul style="list-style-type: none"> • Growth-inducing impacts. |

All of these issues are addressed in this EIR, in the relevant sections identified in the first column.

1.9 DRAFT EIR AND PUBLIC REVIEW

The Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, the general public, organizations, and agencies can submit comments to the Lead Agencies on the Draft EIR's accuracy and completeness. Release of the Draft EIR marks the beginning of a 45-day public review period pursuant to CEQA Guidelines Section 15105. The public can review the Draft EIR on the City's website at:

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

Comments may be submitted both in written form and/or orally at the public hearing on the Draft EIR. Notice of the time and location of the hearing will be published in local newspapers, mailed to property owners and residents surrounding the project, emailed to residents that have requested to be placed on the project's email notification list, posted on the City and Sacramento LAFCo websites, and posted at and adjacent to the site prior to the hearing.

All comments or questions regarding the Draft EIR should be addressed to:

Scott Johnson, Senior Planner
City of Sacramento Community Development Department
Sacramento, CA 95814
(916) 808-5842
SRJohnson@cityofsacramento.org

The City will accept all comments on the Draft EIR, including comments on the portions of the project for which LAFCo is the lead agency. The City will direct all comment letters to LAFCo, and the City and LAFCo will prepare responses to all submitted comments together.

1.10 ORGANIZATION OF THE DRAFT EIR

The EIR is organized into the following sections:

Chapter 1 – Introduction

The Introduction chapter provides an introduction and overview describing the intended use of the EIR and the review and certification process, as well as summaries of the chapters included in the EIR and summaries of the issues and concerns received from the public and public agencies during the NOP review period.



Chapter 2 – Executive Summary

The Executive Summary chapter summarizes the elements of the project and the environmental impacts that would result from implementation of the proposed project, describes proposed mitigation measures, and indicates the level of significance of impacts after mitigation. In addition, the Executive Summary includes a summary of the project alternatives and areas of known controversy.

Chapter 3 – Project Description

The Project Description chapter provides a detailed description of the proposed project, including the project's location, background information, objectives, and technical characteristics.

Chapter 4 – Environmental Setting, Impacts, and Mitigation

Chapter 4 contains both a project-level and program-level analysis, as defined above, as well as a cumulative analysis of environmental issue areas associated with the proposed project. The technical subchapters for each environmental issue contain an introduction and description of the setting of the project site, identify impacts, and recommend appropriate mitigation measures, if needed.

Chapter 5 – Effects Not Found to be Significant

The Effects Not Found to be Significant chapter of the EIR addresses the project's effects that were determined not to be significant. CEQA Guidelines Section 15128 requires a brief discussion explaining why these effects were not found to be significant.

Chapter 6 – Statutorily Required Sections

The Statutorily Required Sections chapter of the EIR provides discussions required by CEQA regarding certain impacts that would result from the proposed project, including a summary of cumulative impacts, potential growth-inducing impacts, significant and unavoidable impacts, and significant irreversible changes to the environment.

Chapter 7 – Alternatives Analysis

The Alternatives Analysis chapter of the EIR describes and evaluates the alternatives to the proposed project.

Chapter 8 – References

The References chapter of the EIR provides bibliographic information for all references and resources cited.

Chapter 9 – EIR Authors and Persons Consulted

The EIR Authors and Persons Consulted chapter lists EIR and technical report authors who provided technical assistance in the preparation and review of the EIR.

Appendices

The Appendices include the NOP, comments received during the NOP comment period, and technical reports prepared for the proposed project.



2. EXECUTIVE SUMMARY

2. EXECUTIVE SUMMARY

2.1 INTRODUCTION

The Executive Summary chapter of the EIR provides an overview of the proposed project (see Chapter 3, Project Description, for further details) and provides a table summary of the conclusions of the environmental analysis provided in Chapters 4.1 through 4.13. This chapter also summarizes the alternatives to the proposed project that are described in Chapter 7, Alternatives Analysis, and identifies the Environmentally Superior Alternative. Table 2-1 contains the environmental impacts associated with the proposed project, the significance of the impacts, the proposed mitigation measures for the impacts, and the significance of the impacts after implementation of the mitigation measures.

2.2 SUMMARY DESCRIPTION OF THE PROPOSED PROJECT

The project site consists of approximately 474.4 acres in Sacramento County, located southeast of the intersection of Interstate 5 (I-5) and Power Line Road. The site is identified by Sacramento County Assessor's Parcel Numbers (APNs) 225-0020-010, -016, -017, -021, -022, -023, -024, -026, -027, -030, -032, -033, -034, and -035, as well as 225-0030-023, -024, -045, and -048.

The project site is currently located within the Natomas area of unincorporated Sacramento County (County). The County's General Plan designates the site as Agricultural Cropland and the site is zoned Agricultural 80 (AG-80). The site is bound to the north by I-5 and to the east by the City of Sacramento (City). Within the northern portion of the site, Bayou Way, a paved road consisting of two vehicle lanes, meanders in a west-to-east direction through the site. The project site currently consists of vacant, fallow agricultural land. The site was historically used as hay fields, with intermittent rice fields from 1937 until at least 2020. Unnamed drainage canals run roughly north-south in both the western and eastern portions of the site. Numerous unimproved dirt roads provide access to the interior of the project site, which is subdivided into multiple agricultural plots.

As described further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City of Sacramento City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch the Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way. As such, the proposed project would also require Annexation into the SacSewer service area.

The proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, located immediately south of Bayou Way. The industrial park would allow for construction of up to 5,204,500 square feet (sf) of industrial uses, as well as approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality, on approximately 13.4 acres of the overall site. Parcels 6A through 6C and 7A



through 7C are proposed retail/highway commercial uses generally situated south of the intersection of I-5 and Metro Air Parkway.

Parcels 1 through 4, all planned for industrial use, generally surround the proposed retail/highway commercial uses. Parcel 5, the remaining proposed industrial use, would be located in the northeast corner of the site. Each industrial building would include driveways and associated parking areas to accommodate vehicles and/or trailers, as well as stormwater retention/detention areas to capture stormwater runoff from the newly constructed impervious surfaces and to provide for existing stormwater storage.

The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. The proposed project would result in first tier entitlements for future industrial uses of approximately 1,404,800 sf within the nonparticipating parcels. The nonparticipating parcels include five existing parcels controlled by separate owners, which are summarized as follows:

- Parcel 8: 64.3 acres (Cayocca/Scalora);
- Parcel 9: 6.5 acres (Campbell);
- Parcel 10: 4.6 acres (Isgur Trust); and
- Parcel 11: 0.7-acre (Patel).

In addition, the nonparticipating parcels include 6.9 acres of California Department of Transportation (Caltrans) Remnant right-of-way (ROW). As part of the Annexation approval process, the industrial park footprint and nonparticipating parcels would receive City of Sacramento 2040 General Plan designations and Prezoning. In addition, it should be noted that the project site includes 37.9 acres of Caltrans I-5 fee title ROW, which would not be developed as part of the proposed project.

Sacramento LAFCo and the City of Sacramento have discretionary authority and are the co-lead agencies for the proposed project. In addition to certification of this EIR and the associated Mitigation Monitoring and Reporting Program, the proposed project requires approval of the following entitlements by Sacramento LAFCo:

- SOI Amendment to include the project site within the City of Sacramento SOI; and
- Annexation of the project site into the Sacramento City limits and SacSewer service area.

The proposed project requires approval of the following entitlements by the City of Sacramento:

- General Plan Amendment (GPA) of the City of Sacramento 2040 General Plan to include the boundaries of the industrial park footprint and nonparticipating parcels (total of 414.3 acres – not including roadways) as Employment Mixed-Use;
- Prezoning of 317.9 acres (not including roadways) to M-1-PUD and 13.4 acres (not including roadways) to HC-PUD for the industrial park portion of the site, and 83 acres to M-1 for the nonparticipating parcels;
- PUD (Schematic Plan and PUD Guidelines)
- Tentative Master Parcel Map;
- Development Agreement;
- Finance Plan; and
- Property Tax Exchange Agreement (with County of Sacramento).



In addition to the aforementioned entitlements from the City, the proposed project would require approvals/permits from the following State, federal, or local agencies:

- California Department of Fish and Wildlife (CDFW);
- United States Army Corps of Engineers (USACE);
- United States Fish and Wildlife Service (USFWS);
- Central Valley Regional Water Quality Control Board (RWQCB);
- Caltrans;
- Pacific Gas and Electric Company (PG&E);
- Sacramento Municipal Utility District (SMUD);
- Reclamation District (RD) 1000;
- SacSewer; and
- Sacramento Area Council of Governments Board of Directors (SACOG Airport Land Use Commission).

Please refer to Chapter 3, Project Description, of this EIR for a detailed description of the proposed project and entitlements, as well as a full list of the project objectives.

2.3 ENVIRONMENTAL IMPACTS AND PROPOSED AND RECOMMENDED MITIGATION

Under CEQA, a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, mineral, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Mitigation measures must be implemented as part of the proposed project to reduce potential adverse impacts to a less-than-significant level. Such mitigation measures are noted in this EIR and are found in the following technical chapters: Agricultural Resources; Air Quality, Greenhouse Gas Emissions, and Energy; Biological Resources; Cultural Resources; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Noise; Transportation; and Tribal Cultural Resources. Any impact that remains significant after implementation of mitigation measures is considered a significant and unavoidable impact.

A summary of the identified impacts in the technical chapters of the EIR is presented in Table 2-1. In Table 2-1, the proposed project impacts are identified for each technical chapter (Chapter 4.1 through 4.13) of the EIR. In addition, Table 2-1 includes the level of significance of each impact, any mitigation measures required for each impact, and the resulting level of significance after implementation of mitigation measures for each impact.

2.4 SUMMARY OF PROJECT ALTERNATIVES

The following section presents a summary of the evaluation of the alternatives considered for the proposed project, which include the following:

- No Project (No Build) Alternative;
- 20 Percent Electric Fleet Alternative; and
- Reduced Footprint Alternative.

The following summary provides brief descriptions of the three alternatives to the proposed project that are evaluated in this EIR. For a more thorough discussion of project alternatives, please refer to Chapter 7, Alternatives Analysis.



No Project Alternative

The No Project Alternative assumes that the project site would remain in its current condition, as described above. The No Project Alternative would not meet any of the identified project objectives and would not result in any impact, with the exception of a slightly greater impact related to Biological Resources due to the lack of impact fees and open space land dedications towards the Natomas Basin Habitat Conservation Program (HCP).

20 Percent Electric Fleet Alternative

The 20 Percent Electric Fleet Alternative would consist of buildout of the project site as proposed, including the future industrial warehouse buildout. Based on the square footages of the total developable lands, the proposed industrial warehouse development, and the future industrial development, the Alternative would require the active warehouses to maintain 20 percent of the truck fleet as electric vehicles at full buildout of the Annexation area.

Because the 20 Percent Electric Fleet Alternative would include development of the project site with the same proposed uses, all of the project objectives would be met. In addition, because the 20 Percent Electric Fleet Alternative would include the operation of 20 percent of the overall fleet as electric vehicles over diesel-powered, the project objectives concerning energy efficiency, utilizing alternative energy sources, and minimizing impacts would be improved. In the case of an electric fleet, impacts associated with air quality and GHG emissions would be most significantly reduced by the alternative.

The 20 Percent Electric Fleet Alternative would result in fewer impacts to Air Quality, GHG Emissions, and Energy as compared to the proposed project. However, the Alternative would result in similar impacts related to Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning/Population and Housing, Noise, Public Services, Utilities, and Service Systems, Transportation, and Tribal Cultural Resources as compared to the proposed project.

Reduced Footprint Alternative

The Reduced Footprint Alternative would consist of buildout of the project site as proposed for the majority of the parcels, and leaving Parcels 9, 10, and 11, as well as an approximately 51.3-acre portion of Parcel 8, as undeveloped agricultural land. In comparison to the proposed project, the Reduced Footprint Alternative would result in a reduction of 419,809.4 sf of industrial buildings and would preserve approximately 51.3 acres of agricultural land and 18 acres of other land, including the wetlands contained within Parcels 10 and 11, for a total of 69.3 acres of preserved land. Because the Reduced Footprint Alternative would include development of the project site with the proposed uses for the majority of the parcels, the project objectives would be met.

The Reduced Footprint Alternative would result in fewer impacts to Agricultural Resources, Air Quality, GHG Emissions, and Energy, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, Public Services, Utilities, and Service Systems, and Tribal Cultural Resources as compared to the proposed project. However, the Alternative would result in similar impacts related to Aesthetics, Hazards and Hazardous Materials, Land Use and Planning/Population and Housing, and Transportation as compared to the proposed project.



Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” The No Project Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, the impacts resulting from the proposed project would not occur under the Alternative.

Based on the analysis presented in Chapter 7, Alternatives Analysis, of this EIR, the Reduced Footprint Alternative would meet all project objectives and would result in similar or fewer impacts as compared to the proposed project. In addition, the Reduced Footprint Alternative would result in fewer impacts to Agricultural Resources, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, Public Services, Utilities, and Service Systems, Transportation, and Tribal Cultural Resources as compared to the proposed project. Therefore, the Reduced Footprint Alternative would be the Environmentally Superior Alternative.

2.5 AREAS OF CONTROVERSY

Areas of controversy that were identified in NOP comment letters, and are otherwise known for the region, include the following:

- Increase in light pollution on nearby residential areas.
- Conversion of agricultural land to other uses.
- Construction and operational emissions of criteria pollutants and/or GHG emissions.
- Health concerns related to truck traffic/truck emissions and the proximity of emission sources to sensitive receptors.
- Loss of plant and wildlife habitat.
- Lighting, noise, and wildlife-human interactions.
- Removal of wetlands or protected plant and animals.
- Potential impacts related to the inadvertent discovery of cultural, historical, or tribal resources at the project site.
- Use of hazardous materials, including rodenticides.
- Degradation of water quality in area waterways.
- Sufficiency of stormwater management.
- Increased and/or exacerbation of flood hazards due to changes in drainage patterns.
- Incompatibility with surrounding land uses.
- Consistency with LAFCo and City Sphere of Influence procedures.
- Consistency with City and County General Plans, and Airport Land Use Compatibility Plan.
- Increase in noise levels to nearby residential areas.
- Annexation into the Regional Sanitation and Sacramento Area Sewer District service area.
- Supply and capacity of water and wastewater facilities.
- Traffic increases in the project vicinity.
- Increased traffic delays and congestion during commute hours.
- Cumulative traffic impacts on the local and regional transportation system.
- Hazards for pedestrians and cyclists associated with increased truck traffic.
- Potential cumulative impacts in combination with the Metro Air Park.
- Growth-inducing impacts.



**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|-----------------------|--|
| 4.1 Aesthetics | | | |
| 4.1-1 Have a substantial adverse effect on a scenic vista. | LS | <i>None required.</i> | N/A |
| 4.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. | LS | <i>None required.</i> | N/A |
| 4.1-3 In a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point). | S | <i>None feasible.</i> | SU |
| 4.1-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. | LS | <i>None required.</i> | N/A |
| 4.1-5 Long-term changes in visual character associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan and the Sacramento County General Plan. | S | <i>None feasible.</i> | SU |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|--|
| 4.1-6 Creation of new sources of light or glare associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan. | LCC | None required. | N/A |
| 4.2 Agricultural Resources | | | |
| 4.2-1 Impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. | S | <p>Industrial Park</p> <p>4.2-1 The City shall ensure that, prior to impacting agricultural/open space resources within the project site by the issuance of a grading permit, any and all project-related subdivision maps satisfy the On-Site Open Space and Off-Site Open Space requirements as defined herein. Open space dedications made pursuant to the Natomas Basin Habitat Conservation Plan (HCP) shall be made to the City and/or the Natomas Basin Conservancy and shall be located in the Natomas Basin. The remaining non-Natomas Basin HCP mitigation acreage may be located in unincorporated Sacramento County, Yolo County, and/or Sutter County, and may be held and managed by a qualified third-party entity with the approval of the City. Preservation shall be ensured in perpetuity via conservation easement, fee, or irrevocable offer of dedication to the satisfaction of the City.</p> <p>a. On-Site Agricultural/Open Space Requirements: The following on-site open space properties are consistent with the mitigation requirements:</p> | SU |

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|--------|---|--|--|
| | | <ul style="list-style-type: none"> • 86 acres of detention basins. • 37.9 acres of freeway buffer. • 2.3 acres of canal buffers. <p>b. Off-site Agricultural/Open Space Requirements: The following Off-Site Open Space properties:</p> <ul style="list-style-type: none"> • 141.51 acres of currently unidentified agricultural/open spaced mitigation property to be located in the unincorporated Sacramento County and/or unincorporated Sutter County. • 50-acre habitat mitigation property APN 225-0020-014. • 67.59-acre habitat mitigation property APN 225-0020-015. <p>c. Phasing: The Airport South Industrial Project will develop in phases, as such, the amount of On-Site and Off-Site Open Space to be provided hereunder shall be in proportion to the amount of acreage proposed to be impacted by such development by the issuance of a grading permit therefor.</p> | |

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|---|---|---|--|
| | | <p>d. With respect to each unidentified open space property listed above, and any proposed substitution of an open space property listed above, the City must determine, in writing, that the proposed agricultural/open space property and/or acreage satisfies the requirements for agricultural/open space to be counted towards the requisite Off-Site Agricultural/Open Space acreage total.</p> <p>e. Nothing in this Agricultural/Open Space Mitigation is intended to limit or restrict USFWS and CDFW in their consideration of Developer's applications for incidental take and/or other habitat mitigation permits or other entitlements under the federal Endangered Species Act and the California Endangered Species Act.</p> | |
| 4.2-2 Impacts related to conflicts with existing zoning for agricultural uses or Williamson Act contracts. | LS | None required. | N/A |
| 4.2-3 Impacts related to involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses or conversion of forest land to non-forest uses. | LS | None required. | N/A |

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| 4.2-4 Impacts related to compliance with the requirements of the Cortese-Knox-Hertzberg act (Government Code, Section 56000 et. seq.) pertaining to the conversion of agricultural land. | S | None feasible beyond Mitigation Measure 4.2-1. | SU |
| 4.2-5 Impacts related to cumulative loss of agricultural land. | CC | 4.2-5 Implement Mitigation Measure 4.2-1. | SU |
| 4.3 Air Quality, Greenhouse Gas Emissions, and Energy | | | |
| 4.3-1 Conflict with or obstruct implementation of the applicable air quality plan during project construction. | S | 4.3-1(a) <i>The following SMAQMD’s Basic Construction Emissions Control Practices (BMPs) for dust control shall be included through a notation on all project grading plans prior to the issuance of grading permits, to the satisfaction of the City of Sacramento Community Development Department.</i> <ul style="list-style-type: none"> • <i>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;</i> • <i>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;</i> • <i>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;</i> | LS |

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| | | <ul style="list-style-type: none"> • Limit vehicle speeds on unpaved roads to 15 miles per hour (mph); • All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used; • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [CCR Title 13, Sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site; • Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [CCR Title 13, Sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.; and • Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated. <p>4.3-1(b) Prior to approval of any Improvement Plans, the project applicant shall provide proof of compliance</p> | |

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| | | <p><i>with the following to the satisfaction of the City of Sacramento Community Development Department:</i></p> <p><i>The project applicant shall show on the plans via notation that the contractor shall ensure that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction of all project components (i.e., construction of the industrial park, nonparticipating parcels, and off-site force main), including owned, leased, and subcontractor vehicles, shall be a combination of engine Tier 3 or Tier 4 off-road construction equipment, or hybrid, electric, or alternatively fueled equipment (or any combination of the above), sufficient to achieve a fleet-wide average reduction in construction-related NO_x emissions to below the applicable SMAQMD thresholds of significance (85 lbs/day). For instance, the emissions presented in Table 4.3-8 of the Draft EIR were achieved by requiring all equipment used during construction to be engine Tier 4.</i></p> <p><i>In addition, all off-road equipment operating at the construction site must be maintained in proper working condition according to manufacturer's specifications. Idling shall be limited to five minutes or less in accordance with the In-Use Off-Road Diesel Vehicle Regulation as required by CARB. Clear signage regarding idling restrictions</i></p> | |

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| | | <p><i>shall be placed at the entrances to the construction site.</i></p> <p><i>Portable equipment over 50 horsepower must have either a valid SMAQMD Permit to Operate (PTO) or a valid statewide Portable Equipment Registration Program (PERP) placard and sticker issued by CARB.</i></p> <p><i>Conformance with the foregoing requirements shall be included as notes and be confirmed through review and approval of grading plans by the City of Sacramento Community Development Department.</i></p> | |
| <p>4.3-2 Conflict with or obstruct implementation of the applicable air quality plan during project operation.</p> | <p>S</p> | <p>4.3-2 <i>Prior to the approval of project improvement plans for both the industrial park and nonparticipating parcels, the project applicant shall comply with the provisions of the Air Quality Management Plan prepared for the proposed project (see Appendix D), and incorporate all requirements into the Airport South Industrial Project conditions of approval. The measures included in the AQMP include the following:</i></p> <ol style="list-style-type: none"> <i>1. Natural gas use shall be prohibited in all land uses, with the exception of the restaurant kitchen.</i> <i>2. The project shall implement a Transportation Management Association (TMA), such as Jibe North Natomas (for more information, visit https://jibe.org/). The TMA must comply</i> | <p>SU</p> |

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| | | <p><i>with the following criteria, and is subject to approval by the City of Sacramento and SMAQMD:</i></p> <ol style="list-style-type: none"> <i>a. The TMA must be legally constituted as a non-profit organization, Property/Business Improvement District (PBID), or a government entity with a non-revocable funding mechanism, such as a community finance district, dedicated to TMA operations and services; and</i> <i>b. The TMA must provide a minimum level of TDM services to employees and residents within the area covered by the AQMP sufficient to achieve the emission reductions claimed by the measure. Services must be enumerated and funded to the satisfaction of the lead agency and SMAQMD.</i> <ol style="list-style-type: none"> <i>3. The project applicant shall require all tenants of the on-site industrial uses to use zero-emission forklifts.</i> <i>4. The project applicant shall require that 4.5 percent of the heavy-duty vehicle fleet be zero emission by full buildout of the annexation area. It should be noted that in the event there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient</i> | |

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|---|---|---|--|
| | | <p><i>vehicles/trucks are not commercially available for the intended application, the “clean fleet requirements” may be adjusted as minimally as possible by the City’s Community Development Department to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks.</i></p> <p>5. <i>The project shall provide complete sidewalks separated from roadway throughout the project site and pedestrian crossing at intersections on-site to ensure employees and visitors can walk between land uses/businesses. The project shall also connect the pedestrian network on-site to the adjacent properties off-site (including South Bayou Way, Power Line Road and potential future connections) as indicated on the preliminary site plan when those portions of the site develop.</i></p> <p>6. <i>Provide EV Ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces.</i></p> | |
| 4.3-3 Expose sensitive receptors to substantial pollutant concentrations. | S | 4.3-3 <i>If Parcel 8 (the 64.3-acre nonparticipating parcel owned by Cayocca) is proposed to be developed with a distribution center (i.e., an industrial warehouse that accommodates more than 100 heavy-duty trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week) within 1,000</i> | LS |

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| | | <p><i>feet of a sensitive receptor, prior to the issuance of any building permit, a Health Risk Assessment (HRA) shall be conducted to calculate the cancer risk associated with on-site truck diesel particulate matter (DPM) emissions.</i></p> <p><i>The HRA shall be prepared in accordance with SMAQMD guidelines, as well as the guidelines identified in the California Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual for Preparation of Health Risk Assessments. If health risks associated with Parcel 8 are determined to exceed the applicable SMAQMD thresholds, a qualified air quality consultant shall identify measures sufficient to reduce the project's health risks to below the SMAQMD's thresholds of significance. Reduction measures may include, but are not limited to, relocation of loading docks to further than 1,000 feet from sensitive receptors, electrification of the heavy-duty truck fleet, and/or other options as they become available. Conformance with the foregoing requirement shall be confirmed through review and approval of the HRA by the City of Sacramento Community Development Department.</i></p> | |
| 4.3-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. | LS | None required. | N/A |

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| 4.3-5 Result in the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency. | LS | <i>None required.</i> | N/A |
| 4.3-6 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). | CC | 4.3-6 <i>Implement Mitigation Measure 4.3-2.</i> | SU |
| 4.3-7 Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. | S | Construction 4.3-7(a) <i>Prior to the initiation of construction of the industrial park, the project applicant shall demonstrate that construction-related GHG emissions would be reduced to 935 MTCO₂e/yr and shall submit proof to the City of Sacramento Community Development Department. In addition, prior to the initiation of construction of the nonparticipating parcels, the future applicant of all future development proposals on such parcels shall demonstrate that construction-related GHG emissions would be reduced to 165 MTCO₂e/yr and shall submit proof to the City of Sacramento Community Development Department.</i> | LS |

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| | | <p><i>Construction-related GHG emissions can be reduced through several options. The SMAQMD recommends the following options for reducing greenhouse gas emission from construction projects:</i></p> <ul style="list-style-type: none"> • <i>Modify the construction schedule to reduce the intensity of construction to lower emissions;</i> • <i>Ensure that phases of development do not overlap;</i> • <i>Use of renewable diesel for construction fuel rather than diesel;</i> • <i>Improve fuel efficiency from construction equipment by: <ul style="list-style-type: none"> ○ <i>Minimizing idling time either by shutting equipment off when not in use or reducing the time of idling to no more than three minutes (five-minute limit is required by the state airborne toxics control measure [Title 13, sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site; and</i> ○ <i>Using equipment with new technologies (repowered engines, electric drive trains).</i> </i> • <i>Perform on-site emission reductions such as implementing on-site material hauling with</i> | |

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| | | <p><i>trucks equipped with on-road engines (if determined to be less emissive than the off-road engines) or real, quantifiable, permanent, verifiable, and enforceable on-site emission reductions;</i></p> <ul style="list-style-type: none"> • <i>Use alternative fuels for generators at construction sites such as propane or solar, or use electrical power;</i> • <i>Use a CARB-approved low carbon fuel for construction equipment; (NO_x emissions from the use of low carbon fuel must be reviewed and increases mitigated.)</i> • <i>Encourage and provide carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes;</i> • <i>Reduce electricity use in the construction office by using LED bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones;</i> • <i>Recycle or salvage non-hazardous construction and demolition debris (goal of at least 75 percent by weight);</i> • <i>Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products utilized should be certified through a sustainable forestry program;</i> • <i>Minimize the amount of concrete for paved</i> | |

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| | | <p>surfaces or utilize a low carbon concrete option;</p> <ul style="list-style-type: none"> • Produce concrete on-site if determined to be less emissive than transporting ready mix; • Use SmartWay certified trucks for deliveries and equipment transport; and • Develop a plan to efficiently use water for adequate dust control. <p>The project applicant may elect to implement any combination of the foregoing measures to reduce construction-related GHG emissions. All GHG emissions reductions must be quantified. Compliance with the aforementioned measures shall be ensured by the City of Sacramento Community Development Department.</p> <p>If the quantified reduction measures do not reduce construction-related GHG emissions to below 935 MTCO₂e/yr for the industrial park and 165, MTCO₂e/yr for the nonparticipating parcels, offsite carbon credits may be purchased to make up the difference. The purchase of off-site mitigation credits shall be negotiated with the City and SMAQMD at the time that credits are sought. Off-site mitigation credits shall be real, quantifiable, permanent, verifiable, enforceable, and additional, consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). The offsets shall be retired, and emissions must be offset through</p> | |

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| | | <p><i>the year 2045. Such credits shall be based on CARB-approved protocols that are consistent with the criteria set forth in subdivision (a) of Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by the City of Sacramento and/or the SMAQMD. Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) any registry established by SMAQMD.</i></p> <p>Operations 4.3-7(b) <i>Prior to the approval of any building permits, the applicant shall implement the following measures:</i></p> <ol style="list-style-type: none"> 1. <i>The proposed project shall be designed such that all project components, with the exception of the on-site restaurant kitchens, are built all-electric. The kitchens shall include pre-wiring to allow for the future retrofit of all natural gas appliances with all-electric appliances. If the kitchens are electrically powered and do not use natural gas, further mitigation is not required; and</i> | |

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| | | <p>2. <i>If natural gas is installed in the kitchens, the applicant shall reduce GHG emissions associated with on-site restaurant kitchens at a rate of 158.77 MTCO₂e/yr through any combination of the following on-site mitigation options:</i></p> <ul style="list-style-type: none"> ○ <i>Requiring on-site renewable energy generation in excess of Code requirements.</i> ○ <i>Increasing the number of EV charging stations.</i> ○ <i>Constructing on-site or fund off-site carbon sequestration projects (such as tree plantings or reforestation projects).</i> ○ <i>Implementing a Transportation Demand Management Program.</i> ○ <i>Should new and quantifiable GHG emission reduction technology become available, the applicant may otherwise achieve the required GHG emissions reduction through other means, subject to review and approval by the City of Sacramento and the SMAQMD.</i> <p><i>The project applicant may elect to implement any combination of the foregoing measures to reduce operational GHG emissions. All</i></p> | |

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| | | <p><i>GHG emissions reductions must be quantified.</i></p> <p><i>If it is determined that the above on-site mitigation options are not sufficient to achieve the required GHG reduction, subject to the discretion of the City of Sacramento and the SMAQMD, off-site carbon credits may be purchased to make up the difference. The purchase of off-site mitigation credits shall be negotiated with the City and SMAQMD at the time that credits are sought. Off-site mitigation credits shall be real, quantifiable, permanent, verifiable, enforceable, and additional, consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). The offsets shall be retired, and emissions must be offset through the year 2045. Such credits shall be based on CARB-approved protocols that are consistent with the criteria set forth in subdivision (a) of Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by the City of Sacramento and/or the SMAQMD. Such credits must be purchased</i></p> | |

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| | | <p><i>through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) any registry established by SMAQMD.</i></p> <p><i>Compliance with the aforementioned measures shall be ensured by the City of Sacramento Community Development Department.</i></p> <p><i>4.3-7(c) Consistent with SMAQMD's GHG BMP-2, prior to the approval of project improvement plans, the applicant shall indicate that EV Ready parking spaces shall be installed throughout the project site at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces. Compliance with this measure shall be ensured by the City of Sacramento Community Development Department.</i></p> <p><i>4.3-7(d) Implement Mitigation Measure 4.12-3.</i></p> | |
| <p>4.3-8 Result in a cumulatively considerable inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency.</p> | <p>LS</p> | <p>None required.</p> | <p>N/A</p> |

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| 4.4 Biological Resources | | | |
| 4.4-1 Impacts to special-status plant species, either directly (e.g., threaten to eliminate a plant community) or through substantial habitat modifications. | S | <p><i>Industrial Park and Nonparticipating Parcels</i></p> <p>4.4-1(a) <i>Prior to the commencement of ground-disturbing activities associated with development of the industrial park footprint and nonparticipating parcels, the following Natomas Basin Habitat Conservation Plan (HCP) Take Avoidance, Minimization, and Mitigation Measures shall be implemented, as applicable:</i></p> <p><u><i>Natomas Basin HCP Section V.A.1:</i></u></p> <p><i>Not less than 30 days or more than 6 months prior to commencement of construction activities, a pre-construction survey of the portion of the site to be disturbed shall be conducted to determine the status and presence of, and likely impacts to, all Covered Species on the site. However, pre-construction surveys for an individual species may be completed up to one year in advance if the sole period for reliable detection of that species is between May 1 and December 31. The project proponent will be responsible for contracting with qualified biological consultants to carry out the pre-construction surveys, and as necessary, to implement specific take minimization, and other Conservation Measures set forth in the Natomas Basin HCP and approved by the Wildlife Agencies.</i></p> | LS |

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|--------|---|---|--|
| | | <p><i>The results of the pre-construction surveys along with recommended take minimization measures shall be documented in a report and shall be submitted to the City, USFWS, CDFG and the Natomas Basin Conservancy. Based upon the survey results, the City will identify applicable take avoidance and other site-specific Conservation Measures, consistent with the Natomas Basin HCP, required to be carried out on the site. The approved pre-construction survey documents and list of Conservation Measures will be submitted by the developer to the City to demonstrate compliance with the Natomas Basin HCP.</i></p> <p><u>Natomas Basin HCP Section V.A.5.o:</u></p> <p><i>If Sanford’s arrowhead plants are identified through a pre-construction survey, the City shall provide notice to USFWS, CDFW and the California Native Plant Society. Under such circumstances, the development proponent shall allow the transplantation of plants prior to site disturbance.</i></p> <p><u>Natomas Basin HCP Section V.A.5.p:</u></p> <p><i>Prior to issuance of a grading permit, the City shall require a pre-construction survey. If such survey determines Boggs Lake hedge-hyssop, Sacramento orcutt grass, Slender orcutt grass, Colusa grass, or legenere are present, the City shall require the developer to consult with USFWS to determine</i></p> | |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <p><i>appropriate measures to avoid and minimize loss of individuals.</i></p> <p>4.4-1(b) <i>With respect to special-status plant species not covered under the Natomas Basin HCP, prior to the commencement of construction activities associated with the nonparticipating parcels, a qualified biologist shall conduct preconstruction protocol-level surveys for special-status plants with potential to occur on-site. The surveys may be conducted concurrently with the preconstruction surveys set forth by Mitigation Measure 4.4-1(a). The results of the surveys shall be submitted for review and approval to the City of Sacramento Community Development Department and shall be valid for two years. If special-status plant species are not found, further mitigation shall not be required.</i></p> <p><i>If any special-status plants are located during the foregoing surveys, the appropriate agency (i.e., CDFW and/or USFWS, depending on the species) shall be consulted to develop appropriate mitigation for the proposed project for expected impacts. If special-status plants would be impacted, as determined by the qualified biologist, a mitigation plan shall be developed in coordination with the appropriate agency and submitted for review and approval to the City of Sacramento Community Development Department. Mitigation shall include that if special-status perennial species are found in</i></p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|--|--|
| | | <p><i>areas proposed for disturbance, the plants shall be dug up and transplanted into a suitable avoided area on-site prior to construction. If the plant found is an annual, then mitigation shall consist of collecting seed-bearing soil and spreading it into a suitable location.</i></p> | |
| <p>4.4-2 Have a substantial adverse effect, either directly or through habitat modifications, on monarch butterfly.</p> | <p>LS</p> | <p><i>None required.</i></p> | <p>N/A</p> |
| <p>4.4-3 Have a substantial adverse effect, either directly or through habitat modifications, on giant garter snake.</p> | <p>S</p> | <p><i>Industrial Park and Nonparticipating Parcels</i> 4.4-3 <i>Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures have been implemented:</i></p> <p><u><i>Natomas Basin HCP Section V.A.5.a:</i></u></p> <ol style="list-style-type: none"> <i>1. Within the Natomas Basin, all construction activity involving disturbance of habitat, such as site preparation and initial grading, is restricted to the period between May 1 and September 30. This is the active period for the giant garter snake and direct mortality is lessened, because snakes are expected to actively move and avoid danger.</i> <i>2. Pre-construction surveys for giant garter snake, as well as other NBHCP Covered Species, must be completed for all</i> | <p>LS</p> |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <p><i>development projects by a qualified biologist approved by USFWS. If any giant garter snake habitat is found within a specific site, the following additional measures shall be implemented to minimize disturbance of habitat and harassment of giant garter snake, unless such project is specifically exempted by USFWS.</i></p> <p>3. <i>Between April 15 and September 30, all irrigation ditches, canals, or other aquatic habitat should be completely dewatered, with no puddled water remaining, for at least 15 consecutive days prior to the excavation or filling in of the dewatered habitat. Make sure dewatered habitat does not continue to support giant garter snake prey, which could detain or attract snakes into the area. If a site cannot be completely dewatered, netting and salvage of prey items may be necessary. This measure removes aquatic habitat component and allows giant garter snake to leave on their own.</i></p> <p>4. <i>For sites that contain giant garter snake habitat, no more than 24-hours prior to start of construction activities (site preparation and/or grading), the project area shall be surveyed for the presence of giant garter snake. If construction activities stop on the project site for a period of two weeks or more, a new giant garter snake survey shall be completed no</i></p> | |

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|--------|---|---|--|
| | | <p>more than 24-hours prior to the re-start of construction activities.</p> <p>5. Confine clearing to the minimal area necessary to facilitate construction activities. Flag and designate avoided giant garter snake habitat within or adjacent to the project as Environmentally Sensitive Areas. This area shall be avoided by all construction personnel.</p> <p>6. Construction personnel completing site preparation and grading operations shall receive USFWS approved environmental awareness training. This training instructs workers on how to identify giant garter snakes and their habitats, and what to do if a giant garter snake is encountered during construction activities. During this training an on-site biological monitor shall be designated.</p> <p>7. If a live giant garter snake is found during construction activities, immediately notify the USFWS and the project's biological monitor. The biological monitor, or his/her assignee, shall do the following:</p> <p style="padding-left: 40px;">a. Stop construction in the vicinity of the snake. Monitor the snake and allow the snake to leave on its own. The monitor shall remain in the area for the remainder of the work day to make sure the snake is not harmed or if it leaves the site, does not return.</p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|---|--|
| | | <p><i>Escape routes for giant garter snake should be determined in advance of construction and snakes should always be allowed to leave on their own. If a giant garter snake does not leave on its own within 1 working day, further consultation with USFWS is required.</i></p> <p>8. <i>Upon locating dead, injured or sick threatened or endangered wildlife species, the project applicant must notify within 1 working day the Service's Division of Law Enforcement (2800 Cottage Way, Sacramento CA 95825) or the Sacramento Fish and Wildlife Office (2800 Cottage Way, Room W2605, Sacramento, CA 95825, telephone 916 414-6600). Written notification to both offices must be made within 3 calendar days and must include the date, time, and location of the finding of a specimen and any other pertinent information.</i></p> <p>9. <i>Fill or construction debris may be used by giant garter snake as an over-wintering site. Therefore, upon completion of construction activities remove any temporary fill and/or construction debris from the site. If this material is situated near undisturbed giant garter snake habitat and it is to be removed between October 1 and April 30, it shall be inspected by a qualified biologist to assure</i></p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|---|--|
| | | <p>that giant garter snake are not using it as hibernaculae.</p> <p>10. No plastic, monofilament, jute, or similar erosion control matting that could entangle snakes will be placed on a project site when working within 200 feet of snake aquatic or rice habitat. Possible substitutions include coconut coir matting, tactified hydroseeding compounds, or other material approved by the Wildlife Agencies.</p> | |
| <p>4.4-4 Have a substantial adverse effect, either directly or through habitat modifications, on northwestern pond turtle.</p> | <p>S</p> | <p>Industrial Park and Nonparticipating Parcels</p> <p>4.4-4(a) Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:</p> <p><u>Natomas Basin HCP Section V.A.5.j:</u></p> <p>1. Take of the northwestern pond turtle as a result of habitat destruction during construction activities, including the removal of irrigation ditches and drains, and during ditch and drain maintenance, will be minimized by the dewatering requirement described above for giant garter snake (see Section 5.a.(3)).</p> <p>4.4-4(b) Implement Mitigation Measure 4.4-1(a).</p> | <p>LS</p> |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|--|--|
| 4.4-5 Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk. | S | <p><i>Industrial Park and Nonparticipating Parcels</i></p> <p>4.4-5(a) <i>Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:</i></p> <p><u>Natomas Basin HCP Section V.A.5.b:</u></p> <p><u>Measures to Reduce Nest Disturbance</u></p> <ol style="list-style-type: none"> 1. <i>Prior to the commencement of development activities, a pre-construction survey shall be completed to determine whether any Swainson's hawk nest trees will be removed on-site, or active Swainson's hawk nest sites occur on or within ½ mile of the development site. These surveys shall be conducted according to the Swainson's Hawk Technical Advisory Committee's (May 31, 2000) methodology or updated methodologies, as approved by the Service and CDFG, using experienced Swainson's hawk surveyors.</i> 2. <i>If breeding Swainson's hawks (i.e. exhibiting nest building or nesting behavior) are identified, no new disturbances (e.g., heavy equipment operation associated with construction) will occur within ½ mile of an active nest between March 15 and September 15, or until a qualified biologist,</i> | LS |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <p><i>with concurrence by CDFG, has determined that young have fledged or that the nest is no longer occupied. If the active nest site is located within 1/4 mile of existing urban development, the no new disturbance zone can be limited to the ¼ mile versus ½ mile. Routine disturbances such as agricultural activities, commuter traffic, and routine facility maintenance activities within ½ mile of an active nest are not restricted.</i></p> <p>3. <i>Where disturbance of a Swainson’s hawk nest cannot be avoided, such disturbance shall be temporarily avoided (i.e., defer construction activities until after the nesting season) and then, if unavoidable, the nest tree may be destroyed during the non-nesting season. For purposes of this provision the Swainson’s hawk nesting season is defined as March 15 to September 15. If a nest tree (any tree that has an active nest in the year the impact is to occur) must be removed, tree removal shall only occur between September 15 and February 1.</i></p> <p>4. <i>If a Swainson’s hawk nest tree is to be removed and fledglings are present, the tree may not be removed until September 15 or until the California Department of Fish and Game has concurred that the young have fledged and are no longer dependent upon the nest tree.</i></p> | |

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|--------|---|--|--|
| | | <p>5. <i>If construction or other project related activities which may cause nest abandonment or forced fledgling are proposed within the ¼ mile buffer zone, intensive monitoring (funded by the project sponsor) by a Department of Fish and Game approved raptor biologist will be required. Exact implementation of this measure will be based on specific information at the project site.</i></p> <p>4.4-5(b) <i>To address potential impacts to Swainson’s hawk foraging habitat that occurs on-site, but outside of the Natomas Basin HCP permit area, the project applicant shall pay the Natomas Basin HCP mitigation fees for land acquisition, enhancement, and management and monitoring activities, should a portion of the City’s surplus HCP coverage be made available to the proposed project.</i></p> <p>OR</p> <p><i>Pursuant to CDFW guidelines, the applicant shall preserve Swainson’s hawk foraging habitat at a 0.5:1 ratio. The preserved habitat shall be at a location approved by the CDFW. Preservation may occur through purchase of conservation easements or fee title of lands with suitable Swainson’s hawk foraging habitat (consistent with CDFW guidelines).</i></p> | |

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| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|---|--|
| 4.4-6 Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl. | S | <p><i>Industrial Park and Nonparticipating Parcels</i></p> <p>4.4-6 Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:</p> <p><u>Natomas Basin HCP Section V.A.5.h:</u></p> <ol style="list-style-type: none"> 1. Prior to the initiation of grading or earth disturbing activities, the applicant/developer shall hire a CDFG approved qualified biologist to perform a pre-construction survey of the site to determine if any burrowing owls are using the site for foraging or nesting. The pre-construction survey shall be submitted to the City prior to the developer's commencement of construction activities and a mitigation program shall be developed and agreed to by the City and developer prior to initiation of any physical disturbance on the site. 2. Occupied burrows shall not be disturbed during nesting season (February 1 through August 31) unless a qualified biologist approved by the CDFG verifies through non-invasive measures that either: 1) the birds have not begun egg-laying and incubation; or 2) that juveniles from the occupied burrows | LS |

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|--------|---|--|--|
| | | <p>are foraging independently and are capable of independent survival.</p> <p>3. If nest sites are found, the USFWS and CDFG shall be contacted regarding suitable mitigation measures, which may include a 300 foot buffer from the nest site during the breeding season (February 1 - August 31), or a relocation effort for the burrowing owls if the birds have not begun egg-laying and incubation or the juveniles from the occupied burrows are foraging independently and are capable of independent survival. If on-site avoidance is required, the location of the buffer zone will be determined by a qualified biologist. The developer shall mark the limit of the buffer zone with yellow caution tape, stakes, or temporary fencing. The buffer will be maintained throughout the construction period.</p> <p>4. If relocation of the owls is approved for the site by USFWS and CDFG, the developer shall hire a qualified biologist to prepare a plan for relocating the owls to a suitable site. The relocation plan must include: (a) the location of the nest and owls proposed for relocation; (b) the location of the proposed relocation site; (c) the number of owls involved and the time of year when the relocation is proposed to take place; (d) the name and credentials of the biologist who will</p> | |

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|---|---|--|--|
| | | <p><i>be retained to supervise the relocation; (e) the proposed method of capture and transport for the owls to the new site; (f) a description of the site preparations at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one-time or long-term vegetation control, etc.); and (g) a description of efforts and funding support proposed to monitor the relocation.</i></p> <p><i>Relocation options may include passive relocation to another area of the site not subject to disturbance through one way doors on burrow openings, or construction of artificial burrows in accordance with the CDFG's October 17, 1995, Staff Report on Burrowing Owls Mitigation (see Appendix D).</i></p> <p><i>5. Where on-site avoidance is not possible, disturbance and/or destruction of burrows shall be offset through development of suitable habitat on TNBC upland reserves. Such habitat shall include creation of new burrows with adequate foraging area (a minimum of 6.5 acres) or 300 feet radii around the newly created burrows. Additional habitat design and mitigation measures are described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation.</i></p> | |
| 4.4-7 Have a substantial adverse effect, either directly or through | LS | None required. | N/A |

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|--|---|---|--|
| habitat modifications, on Aleutian cackling goose, white-faced ibis, and tricolored blackbird. | | | |
| 4.4-8 Have a substantial adverse effect, either directly or through habitat modifications, on loggerhead shrike. | S | <p>Industrial Park and Nonparticipating Parcels</p> <p>4.4-8 Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:</p> <p><u>Natomas Basin HCP Section V.A.5.g:</u></p> <ol style="list-style-type: none"> 1. Prior to issuance of a grading permit, the City shall require a pre-construction survey. 2. If surveys identify an active loggerhead shrike nest that will be impacted by development, the developer shall install brightly colored construction fencing that establishes a boundary 100 feet from the active nest. No disturbance associated with development shall occur within the 100 foot fenced area during the nesting season of March 1 through July 31. A qualified biologist, with concurrence of USFWS must determine young have fledged or that the nest is no longer occupied prior to disturbance of the nest site. | LS |
| 4.4-9 Have a substantial adverse effect, either directly or through habitat modifications, on northern | S | Industrial Park and Nonparticipating Parcels | LS |

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|---|---|---|--|
| <p>harrier, white-tailed kite, song sparrow, and other nesting birds and raptors protected under the MBTA and CFGC.</p> | | <p>4.4-9(a) Raptors: <i>If ground disturbance or other construction activities are proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors protected under the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA) shall be conducted by a qualified biologist within seven days prior to the beginning of construction activities in order to identify active nests. The survey shall be conducted within the proposed construction area and all accessible areas within 0.5-mile. A report summarizing the results of the survey shall be submitted for review and approval to the City of Sacramento Community Development Department. If active nests are not found during the focused survey(s), additional mitigation shall not be required. For any period of project inactivity of more than seven days, the qualified biologist shall conduct a field check of the previously surveyed area before construction activities recommence to confirm nesting raptors have not entered during the interim.</i></p> <p><i>If active raptor nests are found within 0.5-mile of a construction area, construction shall not commence within 0.5-mile of the nest until a qualified biologist determines that the young have fledged, or the biologist has determined that the nesting attempt has failed. If construction activities within 0.5-mile of the nest are necessary, the qualified biologist shall be consulted to determine if the nest buffer can be reduced. The applicant and qualified biologist shall</i></p> | |

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|--------|---|---|--|
| | | <p><i>jointly determine the nest avoidance buffer, and what (if any) nest monitoring is necessary.</i></p> <p><i>If an active raptor nest is found within the project area prior to construction and is in a tree that is proposed for removal, then the project applicant shall implement additional mitigation recommended by a qualified biologist based on CDFW guidelines and obtain any required permits from CDFW.</i></p> <p>4.4-9(b) Songbirds: <i>If ground disturbance or other construction activities are proposed during the nesting season (February 1 to August 31), a focused survey for birds protected under the MBTA shall be conducted by a qualified biologist within seven days prior to the beginning of construction activities in order to identify active nests. The survey shall be conducted within the proposed construction area and all accessible areas within 500 feet. A report summarizing the results of the survey shall be submitted for review and approval to the City of Sacramento Community Development Department. If active nests are not found during the focused survey(s), additional mitigation shall not be required. For any period of project inactivity of more than seven days, the qualified biologist shall conduct a field check of the previously surveyed area before construction activities recommence to confirm nesting songbirds have not entered during the interim.</i></p> | |

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|--------|---|---|--|
| | | <p><i>If active special-status species nests/nesting colonies are located during the survey, the project applicant shall work with a qualified biologist to determine a suitable avoidance buffer and the extent and duration of nest monitoring needed. The perimeter of the protected area shall be indicated by bright orange temporary fencing and signage. Construction activities and/or personnel shall not enter the protected area, except with approval of the biologist. If trees containing nests or burrows must be removed as a result of project implementation, removal shall be completed during the nonbreeding season (late September to January 31).</i></p> <p><i>If active songbird nests are found, a qualified biologist shall establish a 100-foot non-disturbance buffer. The non-disturbance buffers may be reduced based on consultation and approval by the City of Sacramento Community Development Department. The perimeter of the protected area shall be indicated by bright orange temporary fencing. Construction activities or personnel shall not enter the protected area, except with approval of the biologist. If trees containing nests must be removed as a result of project implementation, removal shall be completed during the nonbreeding season (late September to January 31) or after the adults and young are not dependent on the nest site, as determined by a qualified biologist.</i></p> | |

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|---|---|---|--|
| 4.4-10 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. | S | <p><i>Industrial Park</i></p> <p>4.4-10(a) <i>Prior to the commencement of ground-disturbing activities, the project applicant shall notify CDFW, pursuant to CFGC Section 1600. The notification shall include a description of all of the activities associated with the proposed industrial park, not just those associated with the drainages and/or riparian vegetation. Impacts shall be outlined in the notification and are expected to be in substantial conformance with the impacts to biological resources outlined in the Biological Resources Assessment prepared for the Airport South Industrial Project by Bargas Environmental Consulting. Impacts for each activity shall be broken down by temporary and permanent impacts. A description of the proposed mitigation for biological resource impacts shall be outlined per activity and then by temporary and permanent impact. Information regarding project-specific drainage and hydrology changes resulting from project implementation shall be provided, as well as a description of stormwater treatment methods. Minimization and avoidance measures shall be proposed, as appropriate, and may include preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas adjacent to open space areas with native seed, and installation of project-specific stormwater Best Management Practices (BMPs). Mitigation for impacts to Goodding’s willow –</i></p> | LS |

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|--------|---|--|--|
| | | <p><i>red willow riparian woodland and forest, valley oak riparian forest woodland, and California bulrush marsh may include restoration or enhancement of resources on- or off-site, or any other method acceptable to CDFW. Mitigation shall not result in a net loss of a Sensitive Natural Community.</i></p> <p><i>If CDFW determines through the course of the CFGC Section 1600 notification process that the project does not require a Lake or Streambed Alteration Agreement (LSAA) to address potential impacts to Goodding's willow – red willow riparian woodland and forest, valley oak riparian forest woodland, and California bulrush marsh, further mitigation regarding the aforementioned vegetation communities shall not be required. Written verification of the applicant's compliance with the Section 1600 LSAA process shall be submitted to the City of Sacramento Community Development Department.</i></p> <p>Nonparticipating Parcels 4.4-10(b) <i>As part of any application associated with development of the nonparticipating parcels, the applicant shall ensure that a qualified biologist has reviewed areas proposed for disturbance to identify vegetation communities that occur in the development footprint and confirm the presence and acreages of Sensitive Natural Communities. If a Sensitive Natural Community would not be impacted,</i></p> | |

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|---|---|--|--|
| | | <p><i>further mitigation shall not be required. The qualified biologist shall detail any recommendations to avoid impacts to identified Sensitive Natural Communities in a report, which shall be submitted for review and approval to the City of Sacramento Community Development Department.</i></p> <p>4.4-10(c) <i>If a Sensitive Natural Community is identified in a nonparticipating parcel for which a development application has been submitted, the applicant shall implement Mitigation Measure 4.4-10(a).</i></p> | |
| <p>4.4-11 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.</p> | <p>S</p> | <p>Industrial Park</p> <p>4.4-11(a) <i>Prior to the issuance of grading permits, the project applicant shall submit the Aquatic Resources Delineation (ARD) prepared for the proposed project by Bargas Environmental Consulting to the U.S. Army Corps of Engineers (USACE) for a Preliminary Jurisdictional Determination and obtain authorization for the fill of jurisdictional waters of the U.S. through the Clean Water Act (CWA) Section 404 permitting process. Timing for compliance with the specific conditions of the Section 404 permit shall be pursuant to the conditions specified by USACE as part of permit issuance. Proof of compliance with the requirements established herein shall be submitted for review and approval to the City of Sacramento Community Development Department.</i></p> <p>4.4-11(b) <i>Prior to construction in any areas containing wetlands or waters of the U.S. and/or State, the project</i></p> | <p>LS</p> |

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|--------|---|--|--|
| | | <p>applicant shall obtain a water quality certification pursuant to Section 401 of the CWA. Any measures required as part of the issuance of the water quality certification shall be implemented.</p> <p>4.4-11(c) Prior to construction in any areas containing wetlands or waters of the U.S. and/or State, the project applicant shall file a report of waste discharge with the Central Valley Regional Water Quality Control Board (RWQCB) for activities affecting wetlands or waters of the State that are not also under USACE jurisdiction, if applicable.</p> <p>4.4-11(d) Implement Mitigation Measure 4.4-10(a).</p> <p>Nonparticipating Parcels</p> <p>4.4-11(e) As part of any application associated with development of the nonparticipating parcels, the applicant shall ensure that a qualified biologist has conducted an Aquatic Resources Delineation (ARD) for areas proposed for disturbance to identify potential waters of the U.S. and/or State. The ARD shall be conducted in accordance with the minimum standards set forth by the USACE South Pacific Division and Sacramento District Regulatory Program, as well as the Corps of Engineers Wetlands Delineation Manual, Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid</p> | |

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| | | <p><i>West Region of the Western United States or any manuals that supplement or replace these manuals.</i></p> <p><i>If potential waters of the U.S. and/or State are not identified, further mitigation shall not be required. The ARD shall be submitted for review and approval to the City of Sacramento Community Development Department and USACE Sacramento District Regulatory Division.</i></p> <p>4.4-11(f) <i>If waters of the U.S. and/or State are identified within areas proposed for disturbance, the project applicant shall implement Mitigation Measures 4.4-11(a) through 4.4-11(d), as applicable.</i></p> | |
| 4.4-12 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. | S | 4.4-12 <i>Implement Mitigation Measure 4.4-3.</i> | LS |
| 4.4-13 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. | S | <p>Industrial Park</p> 4.4-13(a) <i>Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall hire a qualified arborist to evaluate all trees within areas proposed for disturbance to confirm if the trees meet the definition of a Private Protected Tree, as set forth by Sacramento City Code Section 12.56.020. Results of the tree survey shall be submitted for review and</i> | LS |

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| | | <p><i>approval to the City of Sacramento Department of Public Works' Urban Forestry section. Should any on-site tree that would be potentially impacted by the proposed project be found to qualify as a Private Protected Tree, the project applicant shall obtain a Tree Permit from the City of Sacramento Community Development Department and comply with the permit requirements in effect at the time of project grading for removal, pruning, or soil disturbance within the canopy dripline of a Private Protected Tree.</i></p> <p><i>Nonparticipating Parcels</i></p> <p><i>4.4-13(b) As part of any application associated with development of the nonparticipating parcels, the applicant shall hire a qualified arborist to conduct a tree survey of areas proposed for disturbance to identify any trees that meet the definition of a Private Protected Tree, as established by Sacramento City Code Section 12.56.020. A report detailing the results of the survey shall be submitted for review and approval to the City of Sacramento Community Development Department. If protected trees are not identified, further mitigation shall not be required.</i></p> <p><i>4.4-13(c) If protected trees are identified in areas proposed for disturbance of nonparticipating parcels, the applicant shall implement Mitigation Measure 4.4-13(a).</i></p> | |
| 4.4-14 Conflict with the provisions of an adopted HCP, NCCP, or other | LS | None required. | N/A |

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| approved local, regional, or State habitat conservation plan. | | | |
| 4.4-15 Cumulative loss of habitat for special-status species. | CC | <p><i>Industrial Park</i> 4.4-15(a) Implement Mitigation Measures 4.4-1(a) and 4.4-1(b), 4.4-3, 4.4-4(a), 4.4-5(a) and 4.4-5(b), 4.4-6, 4.4-8, 4.4-9(a) and 4.4-9(b), 4.4-10(a), 4.4-11(a) through 4.4-11(c), and 4.4-13(a).</p> <p><i>Nonparticipating Parcels</i> 4.4-15(b) Implement Mitigation Measures 4.4-1(a) and 4.4-1(b), 4.4-3, 4.4-4(a), 4.4-5(a) and 4.4-5(b), 4.4-6, 4.4-8, 4.4-9(a) and 4.4-9(b), 4.4-10(b) and 4.4-10(c), 4.4-11(e) and 4.4-11(f), and 4.4-13(b) and 4.4-13(c).</p> | LCC |
| 4.5 Cultural Resources | | | |
| 4.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5. | LS | None required. | N/A |
| 4.5-2 Cause a substantial adverse change in the significance of a unique archeological resource pursuant to CEQA Guidelines, Section 15064.5 or disturb human remains, including those interred outside of dedicated cemeteries. | S | <p>4.5-2 The following requirements shall be included through a notation on all project grading plans prior to the issuance of grading permits, to the satisfaction of the City Engineer.</p> <p><i>In the event subsurface deposits believed to be cultural or human in origin are discovered during construction, all work shall halt within a 50-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's</i></p> | LS |

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| | | <p><i>Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</i></p> <ul style="list-style-type: none"> • <i>If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and agency notifications are not required.</i> • <i>If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the City of Sacramento and applicable landowner. The project applicant shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Appropriate treatment measures that preserve or restore the character and integrity of a find may be, but are not limited to, processing materials for reburial, minimizing handling of historical objects, leaving objects in place within the landscape, construction monitoring of further construction activities, and/or returning</i> | |

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| | | <p><i>objects to a location within the project area where they will not be subject to future impacts. Work shall not resume within the no-work radius until the applicant, through consultation, as appropriate, determines that the site either: 1) is not a historical resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) that the treatment measures have been completed to the City's satisfaction.</i></p> <ul style="list-style-type: none"> <i>If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify the City of Sacramento and the Sacramento County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner shall notify the NAHC, which then shall designate a Native American Most Likely Descendant (MLD) for the proposed project (Section 5097.98 of the PRC). The designated MLD shall have 48 hours from the time access to the property is granted to make</i> | |

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| | | <p><i>recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC shall mediate (Section 5097.94 of the PRC). If an agreement is not reached, the landowner shall rebury the remains where they shall not be further disturbed (Section 5097.98 of the PRC). The burial shall also include either recording the site with the NAHC or the appropriate information center, using an open space or conservation zoning designation or easement, or recording a reinternment document with Sacramento County (AB 2641). Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction.</i></p> | |
| 4.5-3 Cause a cumulative loss of cultural resources. | LS | None required. | N/A |
| 4.6 Geology and Soils | | | |
| 4.6-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. | LS | None required. | N/A |

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| 4.6-2 Result in substantial soil erosion or the loss of topsoil. | LS | <i>None required.</i> | N/A |
| 4.6-3 Be located on a geological 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, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code. | S | 4.6-3 <i>Prior to issuance of grading permits, the grading plans shall incorporate the geotechnical recommendations specified in the Preliminary Geotechnical Exploration prepared for the proposed project, including, but not limited to, earthwork recommendations, foundation wall recommendations, pavement recommendations, exterior flatwork recommendations, and the preparation of a design-level geotechnical report. All grading and foundation plans for the development must be reviewed and approved by the City Engineer and Chief Building Official, or their representative(s), prior to issuance of grading and building permits in order to ensure that recommendations in the Preliminary Geotechnical Exploration are properly incorporated and utilized in the project design.</i> | LS |
| 4.6-4 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. | S | 4.6-4 <i>Should construction or grading activities result in the discovery of unique paleontological resources, all work within 100 feet of the discovery shall cease. The City of Sacramento Community Development Department shall be notified, and the resources shall be examined by a qualified archaeologist, paleontologist, or historian, at the developer's expense, for the purpose of recording, protecting, or curating the discovery as appropriate. The archaeologist, paleontologist, or historian shall submit to the City of Sacramento Community Development Department for review and approval a</i> | LS |

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| | | <i>report of the findings and method of curation or protection of the resources. Work may only resume in the area of discovery when the preceding work has occurred.</i> | |
| 4.6-5 Cumulative impacts to geology, soils, seismicity, and paleontological resources. | LS | None required. | N/A |
| 4.7 Hazards and Hazardous Materials | | | |
| 4.7-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. | LS | None required. | N/A |
| 4.7-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. | S | 4.7-2(a) <i>Prior to approval of grading permits, a surficial soil sample laboratory analysis shall be conducted on the project site. Once the soils are collected, the soils shall be tested for OCPs, lead, and asbestos. If soil contaminants are not found, further action is not required; however, if OCPs, lead, or asbestos is found to be higher than the allowable thresholds, the assessment shall include the appropriate mitigation including, but not limited to, soil remediation to an acceptable total threshold limit concentration (TTL) level per applicable State and federal regulations by excavation of the contaminated soil, and subsequent transportation and disposal off-site at an appropriate Class I or Class II facility permitted by DTSC; or by properly capping the contaminated soil, in compliance with DTSC regulations (e.g., placing soils underneath project roadways, etc.). All recommended mitigation measures shall be</i> | LS |

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| | | <p><i>implemented by the project applicant, subject to review and approval by the City of Sacramento Community Development Department.</i></p> <p>4.7-2(b) <i>Prior to approval of grading permits for Parcel 1 and/or Parcel 6A, samples of the soil stockpiles on-site shall be obtained for analysis of contaminants of concern and comparison with applicable regulatory screening levels (i.e., Environmental Screening Levels, California Human Health Screening Levels, Regional Screening Levels, etc.). If soil contaminants are not found, further action is not required. However, where the soil contaminant concentrations exceed the applicable regulatory screening levels, the impacted soil shall be excavated and disposed of off-site at a licensed landfill facility to the satisfaction of the City of Sacramento Community Development Department.</i></p> | |
| <p>4.7-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p> | <p>LS</p> | <p><i>None required.</i></p> | <p>N/A</p> |
| <p>4.7-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant</p> | <p>LS</p> | <p><i>None required.</i></p> | <p>N/A</p> |

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| hazard to the public or the environment. | | | |
| 4.7-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area. | S | 4.7-5(a) <i>To ensure that the final location and design of the detention basins are consistent with the recommendations of the Airport Land Use Commission (ALUC) regarding wildlife hazards to aviation, the project applicant shall prepare a design and management plan for this proposed drainage feature. This plan shall be prepared in coordination with the Sacramento International Airport Operations Manager before commencement of construction. The plan shall determine an appropriate size and location for the detention basins and incorporate specific design measures deemed sufficient by Sacramento County Airport System (SCAS) and the ALUC to minimize bird strikes and other wildlife-related airspace safety hazards in the vicinity of the project area. The plan shall include information sufficient to satisfy requirements for preparation of a Wildlife Hazard Management Plan and shall be prepared by a qualified wildlife hazard damage biologist. The project applicant shall submit a detailed design drawing of the proposed detention basins to SCAS for review.</i> <i>To reduce bird attractants associated with the detention basins, the Wildlife Hazards Management Plan for the detention basins and surrounding landscape shall include the following:</i> | LS |

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| | | <ul style="list-style-type: none"> • Any vegetation planted in the vicinity of the detention basins shall consist of plant species that do not provide birds with opportunities for cover, nesting, perching, or feeding. A detailed design plan for landscaping surrounding the detention basins shall be submitted to SCAS for view; • Signs shall be placed at regular intervals around the perimeter of the detention basins prohibiting the public from feeding any wildlife. The project applicant, and any subsequent property owner shall maintain such signs in good order and replace such signs as necessary. This responsibility shall transfer to the Property Management Association and shall be articulated in the covenants, conditions, and restrictions (CC&Rs); • The CC&Rs shall specify that the project proponent and project applicant shall be responsible for ensuring trash receptacles with covers are provided and properly emptied on a regular basis and replaced as needed; • Installation of structures near the detention basins that could serve as perches for gulls and other birds shall be minimized. The CC&Rs, or other mechanism, shall prohibit the future installation of such structures. • The project applicant shall prohibit all activities and uses that could conflict with | |

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| | | <p><i>implementation of the wildlife hazard management program.</i></p> <p><i>An Adaptive Management Plan shall be prepared and incorporated into the Wildlife Hazard Management Plan. The Adaptive Management Plan shall provide for the long-term management of nuisance birds around the detention basins. The management plan shall involve monitoring and employment of various techniques for controlling birds using adaptive information and bird control products. The Property Management Association, or if none exists, the property owner shall be responsible for ensuring the implementation and continued enforcement of the Adaptive Management Plan and provision of adequate funding. This requirement shall be specified in the CC&Rs or other mechanism. The Adaptive Management Plan shall include the following components:</i></p> <ul style="list-style-type: none"> <i>• Bird control program that involves use of the most efficient and effective bird control techniques available that are practicable and compatible with surrounding land uses.,</i> <i>• Monitoring program that involves patrolling of the detention basins and assessment of the effectiveness of bird control measures, the presence of potential bird attractants, and the need for modifying or increasing bird control measures,</i> | |

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| | | <ul style="list-style-type: none"> • <i>Funding mechanism such as use of an endowment fund or assessment district to fund the long-term monitoring and adaptive management program.</i> • <i>Any use of the detention basins that conflicts with the wildlife control program shall be prohibited.</i> • <i>The Adaptive Management Plan shall include the best available information on various bird control techniques, an explanation of the situations in which various techniques are best employed, and instructions for implementing such techniques. The entity responsible for implementing the management plan shall employ a qualified and experienced Wildlife Damage Biologist/Manager (Manager) who shall be responsible for determining which bird control techniques to implement based on information provided in the management plan and the best scientific and commercial information available. The Manager shall be trained in bird control techniques by the U.S. Department of Agriculture-Wildlife Services (USDA). The initial cost of such training shall be borne by the project applicant. The cost of subsequent training shall be borne by the Property Management Association. The Manager shall have the discretion to use new technologies or information regarding bird control provided</i> | |

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| | | <p><i>they are practicable and within the management budget, and do not conflict with surrounding land uses or storm water control functions of the detention basins.</i></p> <p><i>The monitoring and maintenance portion of the Adaptive Management Plan shall include the following:</i></p> <ul style="list-style-type: none"> <i>• Patrol to ensure the detention basin areas are kept clean and free of refuse and other such material that may attract birds;</i> <i>• Patrol to ensure the public is abiding by rules prohibiting feeding of birds;</i> <i>• Control of vegetative growth around the detention basins to minimize any vegetation that would attract birds for purpose of cover, nesting, perching, or food;</i> <i>• Remove all nesting material prior to completion of nest if any birds attempt to nest in areas surrounding the detention basins. All nest removal activities must comply with provisions of the Migratory Bird Treaty Act, the California Endangered Species Act, and the federal Endangered Species Act;</i> <i>• Inspect the detention basin areas to determine whether additional measures are needed to reduce bird use of the detention basins; and</i> <i>• Aggressively haze wildlife to discourage use of the basins.</i> | |

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| | | <p><i>If monitoring efforts reveal that additional control efforts are necessary, the Bird Control Program Manager may implement one or more control techniques outlined in the Adaptive Management Plan, or other techniques based on best available scientific and commercial information. Bird control techniques currently being used at airports, on agricultural lands, and in other areas where birds pose a hazard or nuisance shall be described in the Adaptive Management Plan. The Bird Control Program Manager shall have discretion of using any one or more of the techniques based on the need, practicability, and land use compatibility. These techniques may include, but are not limited to, allowing grass to grow over 8 inches in height (currently being employed at some airports).</i></p> <p><i>In addition to these control techniques, the Adaptive Management Plan shall outline an education program for the Property Management Association to implement ensuring that the public is aware of the importance of eliminating bird attractants from the area around the lake. The public shall be prohibitive from feeding birds around the detention basins and engaging in any other activities within the boundaries of the development project which may attract wildlife hazards to aircraft operations. The public shall be made aware of the purpose and importance of</i></p> | |

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| | | <p><i>various bird control measures being implemented by the Bird Control Program Manager.</i></p> <p><i>All activities and uses of the detention basins that may conflict with the wildlife control program shall be expressly prohibited.</i></p> <p><i>If the SCAS determines that conditions in the Airport South Industrial Project Development are not consistent with the above listed Management Program, SCAS may take the following actions:</i></p> <ul style="list-style-type: none"> <i>• Notify the property owner that the wildlife control measures are out of compliance;</i> <i>• County Airport System may, at its option, initiate control measures at the site, with the costs of such measures billed to the owner; and</i> <i>• In the event of an immediate threat to aircraft safety, County Airport System personnel can take immediate action to remedy the air hazard emergency.</i> <p><i>To reduce attractants for Canada geese, American coots, or gulls associated with the detention basins and surrounding landscape the Management Plan shall include the following:</i></p> <ul style="list-style-type: none"> <i>• Signs shall be posted and identify that feeding birds is prohibited.</i> | |

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| | | <ul style="list-style-type: none"> • Any nest building activity associated with birds shall be removed including all nesting materials. • To prevent the establishment of resident populations of Canada geese on the project site, the Bird Control Program Manager shall take the following, but not limited to, actions: <ul style="list-style-type: none"> ○ Chase birds from site, ○ Use of noise generators (e.g., pyrotechnic devices, blank cartridges), ○ Use of visual devices (e.g., flags, scarecrows, water sprays) ○ Use of chase dogs, ○ Live trapping or netting, and/or ○ Use of chemical repellants. | |
| 4.7-6 Cumulative exposure to potential hazards and increases in the transport, storage, and use of hazardous materials. | LS | None required. | N/A |
| 4.8 Hydrology and Water Quality | | | |
| 4.8-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction. | S | 4.8-1 Prior to issuance of any grading permits, the contractor shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for review and approval by the Central Valley RWQCB. The contractor shall file the Notice of Intent (NOI) and associated fee to the SWRCB. The SWPPP shall serve as the framework for identification, assignment, and implementation of BMPs. The contractor shall implement BMPs to reduce pollutants in stormwater discharges to the | LS |

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|--|---|--|--|
| | | <p><i>maximum extent practicable. Construction (temporary) BMPs for the project may include, but are not limited to: fiber rolls, straw bale barrier, straw wattles, storm drain inlet protection, velocity dissipation devices, silt fences, wind erosion control, stabilized construction entrance, hydroseeding, revegetation techniques, and dust control measures. The SWPPP shall be submitted to both the City Director of Public Works, and the City Engineer for review and approval and shall remain on the project site during all phases of construction. Following implementation of the SWPPP, the contractor shall subsequently demonstrate the SWPPP's effectiveness and provide for necessary and appropriate revisions, modifications, and improvements to reduce pollutants in stormwater discharges to the maximum extent practicable.</i></p> | |
| <p>4.8-2 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations.</p> | <p>S</p> | <p>4.8-2 <i>Prior to approval of final project improvement plans for any on-site development, the project applicant shall submit a detailed Best Management Practice (BMP) and water quality maintenance plan to the City for review and approval. The BMP and water quality maintenance plan shall meet the standards of the City's NPDES Permit, the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, and the Stormwater Quality Design Manual for the Sacramento region. Site design measures, source control measures, hydromodification management, and Low Impact</i></p> | <p>LS</p> |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|--|
| | | <i>Development (LID) standards, as necessary, shall be incorporated into the design and shown on the improvement plans.</i> | |
| 4.8-3 Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. | LS | <i>None required.</i> | N/A |
| 4.8-4 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: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or 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. | LS | <i>None required.</i> | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|--|--|---|
| 4.8-5 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 impede or redirect flood flows, or in flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation. | S | 4.8-5 Prior to approval of any grading permits, the applicant shall obtain from the Federal Emergency Management Agency (FEMA), a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area, if required. A copy of the letter shall be provided to the Engineering Services Division. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the City Engineer prior to acceptance of grading permits as complete. | LS |
| 4.8-6 Cumulative impacts related to the violation of water quality standards or waste discharge requirements, and impacts resulting from the alteration of existing drainage patterns. | LS | None required. | N/A |
| 4.9 Land Use and Planning/Population and Housing | | | |
| 4.9-1 Cause a significant environmental impact due to physically dividing an established community. | LS | None required. | N/A |
| 4.9-2 Cause a significant environmental impact due to a conflict with any Sacramento LAFCo plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. | LS | None required. | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|-----------------------|--|
| 4.9-3 Cause a significant environmental impact due to a conflict with the City of Sacramento 2040 General Plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. | LS | <i>None required.</i> | N/A |
| 4.9-4 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure). | LS | <i>None required.</i> | N/A |
| 4.9-5 Cause a significant cumulative 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. | LS | <i>None required.</i> | N/A |
| 4.9-6 Cause a significant cumulative environmental impact due to cumulative substantial unplanned population growth. | LS | <i>None required.</i> | N/A |
| 4.10 Noise | | | |
| 4.10-1 Generation of a substantial temporary increase in ambient | LS | <i>None required.</i> | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|--|--|
| 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. | | | |
| 4.10-2 Generation of a substantial 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. | S | 4.10-2 <i>Prior to approval by the City's Public Works Department of the final Improvement Plans for the nonparticipating parcels portion of the proposed project, the Improvement Plans shall include the following requirements:</i> <ul style="list-style-type: none"> • <i>An eight-foot-tall sound wall shall be constructed along the eastern project boundary, in the location indicated in 4.10-6 and the Environmental Noise Assessment prepared for the proposed project by Saxelby Acoustics, in order to achieve the City's nighttime 50 dBA L₅₀ noise level standards.</i> • <i>Noise barrier walls shall be constructed of concrete panels, concrete masonry units, earthen berms, or any combination of these materials that achieve the required total height. Wood is not recommended due to eventual warping and degradation of acoustical performance.</i> | LS |
| 4.10-3 Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. | LS | None required. | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|-----------------------|--|
| 4.10-4 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose persons residing or working in the project area to excessive noise levels. | LS | <i>None required.</i> | N/A |
| 4.10-5 Generation of a substantial permanent increase in ambient noise levels associated with development of the proposed project in combination with future development. | LS | <i>None required.</i> | N/A |
| 4.11 Public Services, Utilities, and Service Systems | | | |
| 4.11-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. | LS | <i>None required.</i> | N/A |
| 4.11-2 Result in substantial adverse physical impacts associated with the provision of new or physically | LS | <i>None required.</i> | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|-----------------------|--|
| altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. | | | |
| 4.11-3 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools. | LS | <i>None required.</i> | N/A |
| 4.11-4 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for parks or other government services; or result in an increase in the use of existing neighborhood and | LS | <i>None required.</i> | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|---|-----------------------|--|
| regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. | | | |
| 4.11-5 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. | LS | <i>None required.</i> | N/A |
| 4.11-6 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | LS | <i>None required.</i> | N/A |
| 4.11-7 Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in | LS | <i>None required.</i> | N/A |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|--|--|---|
| addition to the provider's existing commitments. | | | |
| 4.11-8 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, or conflict with federal, State, and local management and reduction statutes and regulations related to solid waste. | LS | <i>None required.</i> | N/A |
| 4.11-9 Cumulative impacts to public services. | LS | <i>None required.</i> | N/A |
| 4.11-10 Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the Sacramento General Plan. | LS | <i>None required.</i> | N/A |
| 4.12 Transportation | | | |
| 4.12-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities. | LS | <i>None required.</i> | N/A |
| 4.12-2 Conflict with a program, plan, ordinance, or policy addressing the circulation system during operations. | S | 4.12-2 <i>The following requirements shall be noted on project improvement plans, subject to review and approval by the City of Sacramento Community Development Department:</i> | LS |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|--|--|
| | | <ul style="list-style-type: none"> • The project should construct pedestrian and bicycle facilities along its frontage to City Standards. • Class IV separated bicycle facilities shall be accommodated within the proposed cross section to provide separation between cyclists and heavy truck traffic. • The bicycle network shall be connected to the existing and planned City and County bikeway system, including, but not limited to, Bayou Way at the northeast corner of the site, the Class I bikeway at the southeast corner of the site, and Metro Air Parkway north of I-5. • The off-street Class IV cycle track shown on the eastern side of the site in the City Bikeway Master Plan shall be accommodated in the proposed plans. | |
| 4.12-3 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). | S | 4.12-3 Prior to the certificate of occupancy for each on-site industrial building, the owner/operator of each building shall be required to prepare and implement a VMT Reduction Plan that includes a sufficient selection of CAPCOA Trip Reduction Programs (T-6 through T-13) to reduce VMT by at least 22 percent, consistent with the VMT Mitigation Memorandum prepared by the City's Public Works Department for the proposed project (see Appendix Q to the EIR). CAPCOA Trip Reduction Programs T-6 through T-13 include measures such as implementing a commute trip reduction program and/or marketing, providing a | LS |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|--|--|
| | | <i>rideshare program, implementing a subsidized or discounted transit program, providing end-of-trip bicycle facilities, providing employer-sponsored vanpool, pricing workplace housing, and implementing employee parking cash-out. The VMT Reduction Plan shall be submitted to the City's Department of Public Works and Community Development Department for review and approval.</i> | |
| 4.12-4 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. | LS | None required. | N/A |
| 4.12-5 Substantially increase cumulative hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | LCC | None required. | N/A |
| 4.13 Tribal Cultural Resources | | | |
| 4.13-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074. | S | 4.13-1(a) Conduct Cultural Resources Sensitivity and Awareness Training Prior to Ground-Disturbing Activities <i>The City shall require the applicant/contractor to provide a tribal cultural resources sensitivity and awareness training program (Worker Environmental Awareness Program [WEAP]) for all personnel</i> | LS |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <p><i>involved in project construction, including field consultants and construction workers. The WEAP will be developed in coordination with culturally affiliated Native American tribes. The WEAP shall be conducted before any project-related construction activities begin at the project site. The WEAP will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations.</i></p> <p><i>The WEAP will also describe appropriate avoidance and impact minimization measures for tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential tribal cultural resources are encountered. The WEAP will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values.</i></p> <p>4.13-1(b) In the Event that Tribal Cultural Resources are Discovered During Construction, Implement Procedures to Evaluate Tribal Cultural Resources and Implement Avoidance and Minimization Measures to Avoid Significant Impact.</p> | |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|---|--|
| | | <p><i>If tribal cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural materials), and the construction contractor shall immediately notify the project's City representative. Avoidance and preservation in place is the preferred manner of mitigating impacts to tribal cultural resources. This will be accomplished, if feasible, by several alternative means, including:</i></p> <ul style="list-style-type: none"> • <i>Planning construction to avoid tribal cultural resources, archaeological sites and/or other cultural resources; incorporating cultural resources within parks, green-space or other open space; covering archaeological resources; deeding a cultural resource to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity.</i> • <i>Recommendations for avoidance of tribal cultural resources will be reviewed by the City representative, interested culturally affiliated Native American tribes and other appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and</i> | |

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**Table 2-1
 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|---|--|
| | | <p><i>environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project site to avoid tribal cultural resources, modification of the design to eliminate or reduce impacts to tribal cultural resources or modification or realignment to avoid highly significant features within a cultural resource or tribal cultural resource.</i></p> <ul style="list-style-type: none"> <i>Native American representatives from interested culturally affiliated Native American tribes will be notified to review and comment on these analyses and shall have the opportunity to meet with the City representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.</i> <i>If the discovered tribal cultural resource can be avoided, the construction contractor(s), will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. The boundary of a tribal cultural resource will be determined in consultation with interested culturally affiliated Native American tribes and tribes will be notified to monitor the installation of</i> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|---|--|
| | | <p><i>fencing. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.</i></p> <ul style="list-style-type: none"> <i>The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area".</i> <p><i>If a tribal cultural resource cannot be avoided, the following performance standard shall be met prior to continuance of construction and associated activities that may result in damage to or destruction of tribal cultural resources:</i></p> <ul style="list-style-type: none"> <i>Each resource will be evaluated for California Register of Historical Resources- (CRHR) eligibility through application of established eligibility criteria (California Code of Regulations 15064.636), in consultation with consulting Native American tribes, as applicable.</i> <p><i>If a tribal cultural resource is determined to be eligible for listing in the CRHR, the City will avoid damaging effects to the resource in accordance with California PRC Section 21084.3, if feasible. The City shall</i></p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <p><i>coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior’s Professional Qualifications Standards for Archeology) approved by the City and with interested culturally affiliated Native American tribes that respond to the City’s notification. As part of the site investigation and resource assessment, the City and the archaeologist shall consult with interested culturally affiliated Native American tribes to assess the significance of the find, make recommendations for further evaluation and treatment as necessary and provide proper management recommendations should potential impacts to the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record. For any recommendations made by interested culturally affiliated Native American tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.</i></p> <p><i>Native American representatives from interested culturally affiliated Native American tribes and the City representative will also consult to develop measures for long-term management of any discovered tribal cultural resources. Consultation will</i></p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <p><i>be limited to actions consistent with the jurisdiction of the City and taking into account ownership of the subject property. To the extent that the City has jurisdiction, routine operation and maintenance within tribal cultural resources retaining tribal cultural integrity shall be consistent with the avoidance and minimization standards identified in this mitigation measure.</i></p> <p><i>If the City determines that the project may cause a significant impact to a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less-than significant may be reached:</i></p> <ul style="list-style-type: none"> <i>• Avoid and preserve resources in place, including, but not limited to, planning construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.</i> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|--|--|
| | | <ul style="list-style-type: none"> • <i>Treat the resource with culturally appropriate dignity taking into account the Tribal cultural values and meaning of the resource, including, but not limited to, the following:</i> <ul style="list-style-type: none"> ○ <i>Protect the cultural character and integrity of the resource.</i> ○ <i>Protect the traditional use of the resource.</i> ○ <i>Protect the confidentiality of the resource.</i> ○ <i>Establish permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places.</i> ○ <i>Protect the resource.</i> <p>4.13-1(c) Implement Procedures in the Event of the Inadvertent Discovery of Native American Human Remains.</p> <p><i>If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the City will implement the procedures listed above. The following performance standards shall be met prior to implementing or continuing actions such as construction, which may result in damage to or destruction of human remains. In accordance with</i></p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--------|---|---|--|
| | | <p><i>the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (HSC Section 7050.5[b]).</i></p> <p><i>If the human remains are of historic age and are determined to be not of Native American origin, the City will follow the provisions of the HSC Section 7000 (et seq.) regarding the disinterment and removal of non-Native American human remains.</i></p> <p><i>If the Coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the Coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant (MLD), in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in California PRC Section 5097.9 et seq.</i></p> | |

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 Summary of Impacts and Mitigation Measures**

| Impact | Level of Significance Prior to Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|--|--|----------------------------|---|
| 4.13-2 Cause a cumulative loss of tribal cultural resources. | LS | <i>None required.</i> | N/A |

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3. PROJECT DESCRIPTION

3. PROJECT DESCRIPTION

3.1 INTRODUCTION

CEQA Guidelines Section 15125 requires an EIR to include a description of the physical conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published, from both a local and regional perspective. Knowledge of the existing environmental setting is critical to the assessment of environmental impacts. Pursuant to CEQA Guidelines Section 15125, the description of the environmental setting shall not be longer than necessary to understand the potential significant effects of the project and its alternatives.

This chapter of the EIR provides a comprehensive description of the Airport South Industrial Project (proposed project), in accordance with the CEQA Guidelines. This chapter provides an overall general description of the existing environmental conditions; however, more detailed discussions of the existing setting as they relate to each given potential impact area are included in each technical chapter of this EIR.

Pursuant to CEQA Guidelines Section 15124, an EIR is required to include a project description that includes the following information: project location, project objectives, a general description of the project's technical, economic and environmental characteristics, and a statement briefly describing the intended uses of the EIR, including a list of agencies expected to use the EIR, a list of permits and other approvals required to implement the project, and a list of related environmental review required by federal, state or local laws, regulations or policies. According to CEQA Guidelines Section 15124, the project description is not required to supply extensive detail beyond that needed for evaluation and review of the environmental impacts.

3.2 PROJECT LOCATION

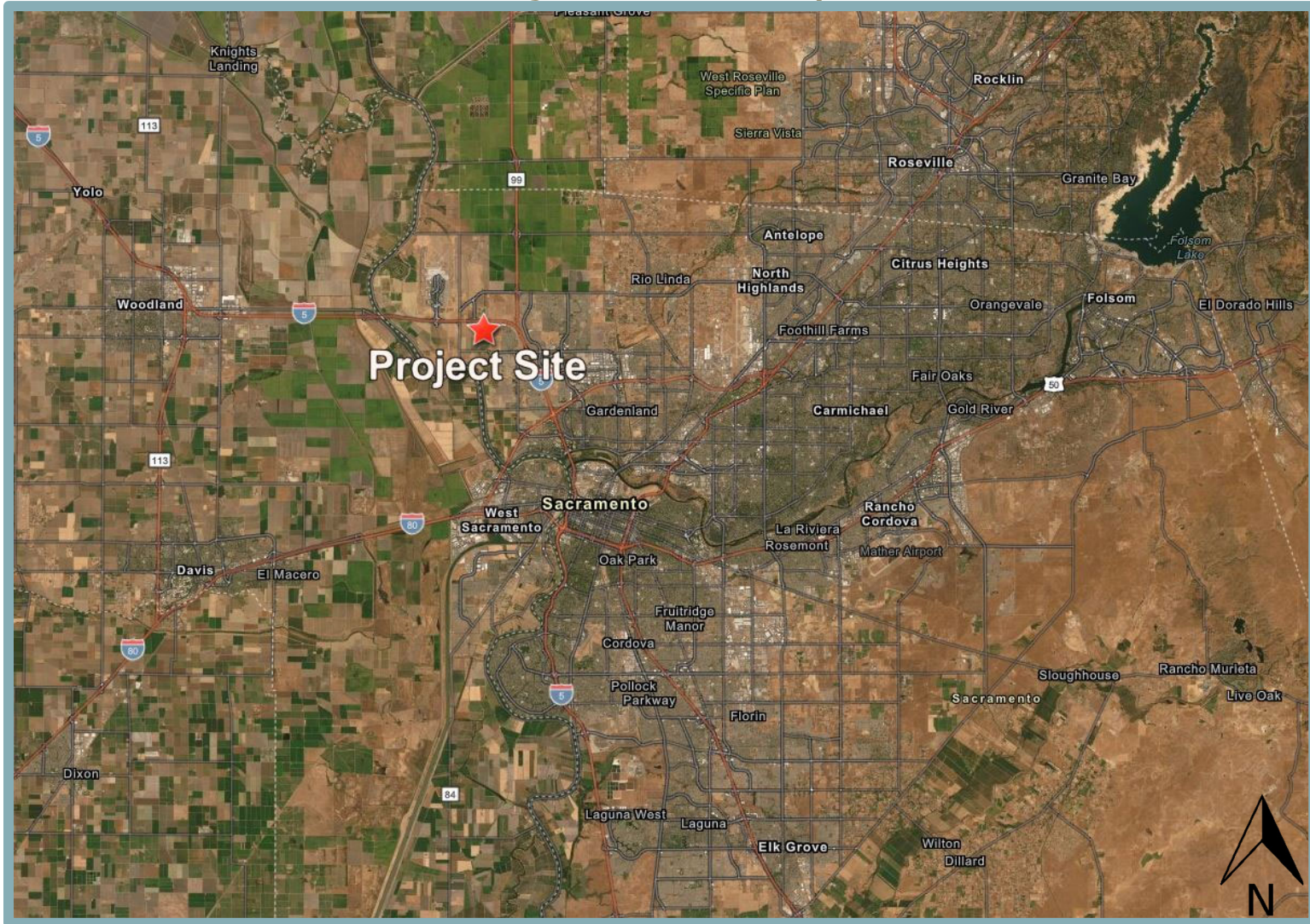
The 474.4-acre project site is located to the southeast of the intersection of Interstate 5 (I-5) and Power Line Road in Sacramento County, California (see Figure 3-1 and Figure 3-2). The site is identified by Sacramento County Assessor's Parcel Numbers (APNs) 225-0020-010, -016, -017, -021, -022, -023, -024, -026, -027, -030, -032, -033, -034, and -035, as well as 225-0030-023, -024, -045, and -048.

3.3 PROJECT SETTING AND SURROUNDING LAND USES

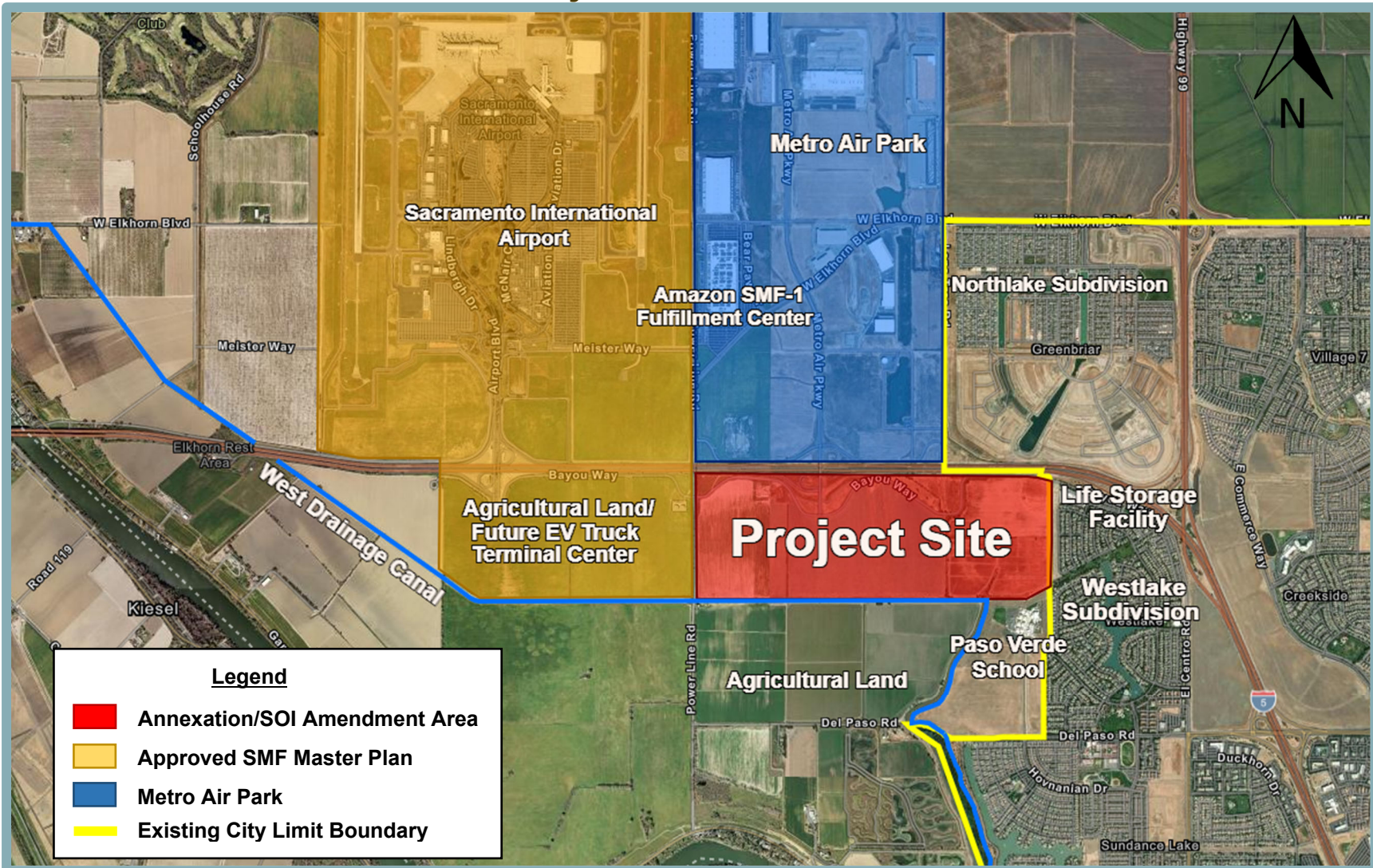
The project site is currently located within the Natomas Community of unincorporated Sacramento County (County). The County's General Plan designates the site as Agricultural Cropland and the site is zoned Agricultural 80 (AG-80). The site is bound to the north by I-5 and to the east by the City of Sacramento (City). Within the northern portion of the site, Bayou Way, a paved road consisting of two vehicle lanes, meanders in a west-to-east direction through the site. The project site currently consists of vacant, fallow agricultural land. The site was historically used as hay fields, with intermittent rice fields from 1937 until at least 2020. Unnamed drainage canals run roughly north-south in both the western and eastern portions of the site. Numerous unimproved dirt roads provide access to the interior of the project site, which is subdivided into multiple agricultural plots.



**Figure 3-1
Regional Location Map**



**Figure 3-2
Project Site Boundaries**



Surrounding land uses include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

3.4 PROJECT OBJECTIVES

The following project objectives have been developed in concert with Sacramento Local Agency Formation Commission (LAFCo) staff, City of Sacramento staff, and the project applicant:

1. Utilize a targeted municipal service review to amend the City's Sphere of Influence, followed by Annexation of the project site into the City of Sacramento, to construct a high-quality industrial park with elevated aesthetics to be capable of serving warehouse, distribution, research, and other light industrial uses, as well as retail and commercial uses.
2. Utilize a targeted municipal service review to amend the Sphere of Influence of the Sacramento Area Sewer District (SacSewer) to provide wastewater services to the project site.
3. Create substantial, permanent employment opportunities for residents of the City of Sacramento and surrounding areas, including the North Natomas area and the Northlake project site.
4. Provide light industrial and warehousing opportunities closer to the City of Sacramento developed areas, thereby lowering local and regional vehicle miles traveled (VMT) and traffic congestion.
5. Provide retail, commercial, and hotel uses along the I-5 corridor in close proximity to Sacramento International Airport.
6. Attract new businesses and jobs to the City, thereby improving the jobs/housing balance both in the City and the region.
7. Construct an industrial park that incorporates energy efficiency and low water use principles in order to promote the City's environmental goals.
8. Utilize alternative energy sources, including solar panels, where feasible.
9. Locate the project as near as possible to existing developed areas and utility infrastructure with anticipated capacity.
10. Create an internal roadway network for the project site that will allow for efficient access to the site and limit impacts to offsite roadways by directing truck traffic directly to I-5.
11. Phase project construction to be responsive to market demands.
12. Minimize environmental impacts to surrounding areas, including residential communities and other sensitive land uses.

3.5 PROJECT COMPONENTS

The proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, located immediately south of Bayou Way. The industrial park would allow for construction of up to 5,204,500 square feet (sf) of industrial uses on approximately 235.6 acres, as well as approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality, on approximately 13.4 acres. Throughout this EIR, the term "industrial park" is used as an umbrella term for the proposed industrial and retail/highway commercial uses. Thus, unless a distinction between the proposed industrial and



retail/highway commercial uses is specifically defined, the term “industrial park” can be assumed to incorporate both of the foregoing uses.

Parcels 6A through 6C and 7A through 7C are proposed retail/highway commercial uses generally situated south of the intersection of I-5 and Metro Air Parkway (see Figure 3-3). Parcels 1 through 4, all planned for industrial use, generally surround the proposed retail/highway commercial uses. Parcel 5, the remaining proposed industrial use, would be located in the northeast corner of the site. Each industrial building would include driveways and associated parking areas to accommodate vehicles and/or trailers, as well as stormwater retention/detention areas to capture stormwater runoff from the newly constructed impervious surfaces and to provide for existing stormwater storage.

The project site also includes several nonparticipating parcels, comprised of approximately 83 acres, and would result in first tier entitlements for future industrial uses of approximately 1,404,800 sf. The parcels will receive General Plan and Prezoning designations as part of the Annexation process, which is discussed further below. Finally, the project site includes 37.9 acres of California Department of Transportation (Caltrans) I-5 fee title right-of-way (ROW), which would not be developed as part of the proposed project.

The proposed project would require the following approvals:

- LAFCo approval of a Sphere of Influence (SOI) Amendment to amend the City of Sacramento SOI; and Annexation of the project site into the City limits and SacSewer service area;
- City of Sacramento approval of a General Plan Amendment (GPA), Prezoning, Planned Unit Development (PUD), Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement (with County).

The proposed project components, along with all required approvals, are described in the following sections.

Sphere of Influence Amendment and Annexation

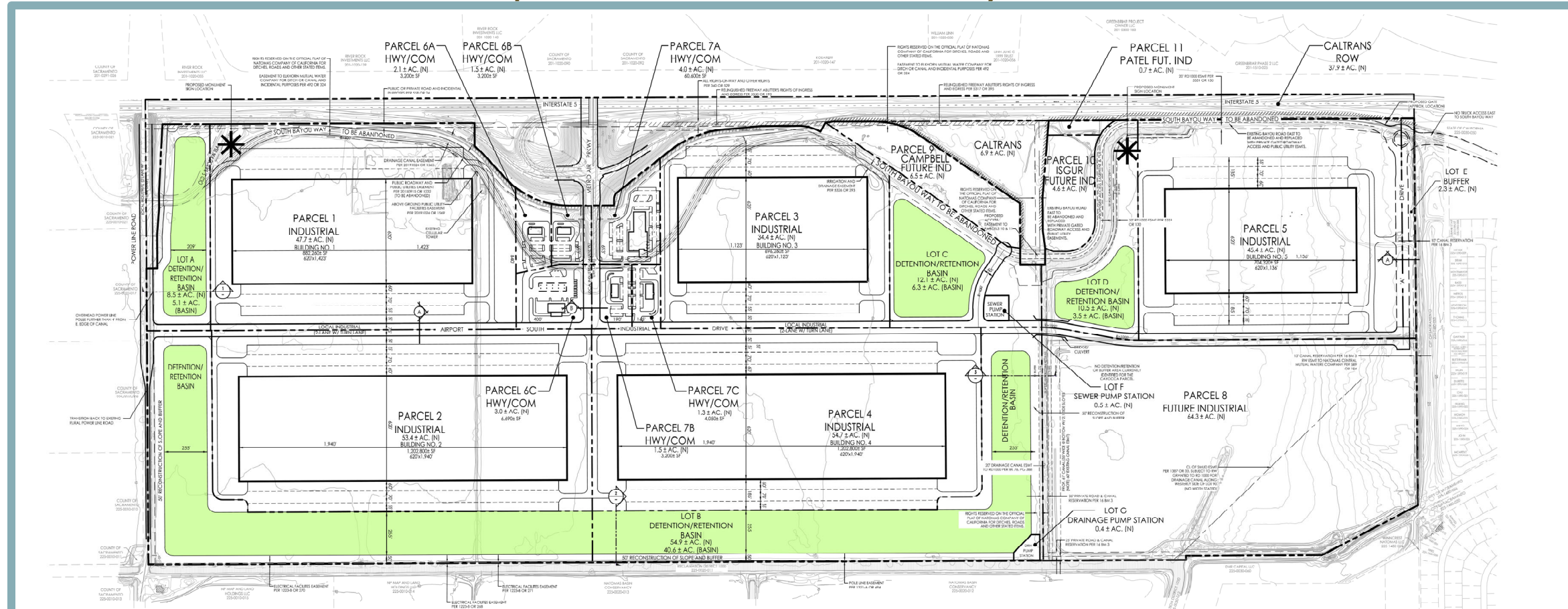
Consistent with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (see Government Code Sections 5600 through 57500), the proposed project requires Sacramento LAFCo approval of a SOI Amendment to amend the City SOI to include the project site (474.4 acres). As detailed in Chapter V of the Sacramento LAFCo Policy, Standards and Procedures Manual, Sacramento LAFCo approves applications for annexation only if said proposals conform to and lie wholly within the approved boundaries of affected agencies’ SOIs. The project site is currently situated adjacent, but outside, of the City of Sacramento’s SOI. A Targeted Municipal Services Review is required, and has been prepared, to support modification of the City’s SOI to be coterminous with the boundaries of the project site, as well as annex the project site into the SacSewer service area.

General Plan Amendment

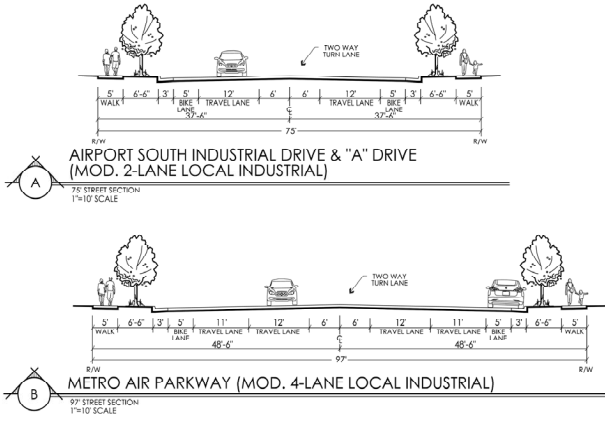
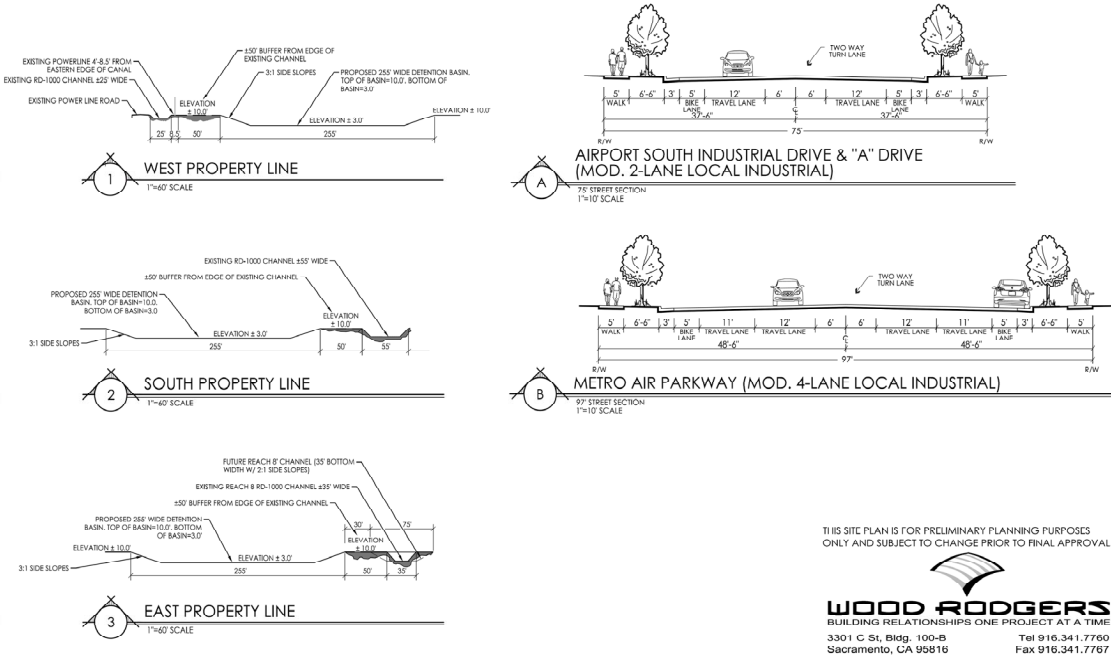
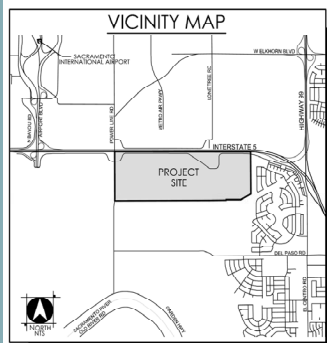
As part of Annexation of the project site into the City limits, the proposed project would require a GPA of the City’s existing General Plan policy area to include the boundaries of the industrial park footprint and nonparticipating parcels (total of 414.3 acres – not including roadways and Caltrans Remnant/ROW) as Employment – Mixed Use.



**Figure 3-3
 Airport South Industrial Park – Preliminary Site Plan**



| Site Plan Lot Number | Land Owner | Proposed Land Use | GP Designation | Zone | Net Acreage | Bldg SF | Floor Area Ratio (FAR) | FAR Calc'd or Used for SF Est. | Use for Est. Bldg SF |
|---|------------------------------|---------------------------|-----------------------------|------|--------------|--------------------|------------------------|--------------------------------|----------------------|
| Project Applicant Sponsored Lands | | | | | | | | | |
| 1 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 47.7 | 882,300 | 0.43 | Calculated | 979,450 |
| 2 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 53.4 | 1,202,800 | 0.52 | Calculated | 1,335,200 |
| 3 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 34.4 | 696,260 | 0.48 | Calculated | 772,900 |
| 4 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 54.7 | 1,202,800 | 0.50 | Calculated | 1,335,200 |
| 5 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 85.4 | 704,320 | 0.36 | Calculated | 781,800 |
| Subtotal Warehouse | | | | | 275.6 | 4,588,480 | 0.45 | Average | 5,294,500 |
| 6A | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 2.1 | 3,200 | 0.03 | Calculated | 3,900 |
| 6B | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 1.5 | 3,200 | 0.05 | Calculated | 3,900 |
| 6C | NorthPoint / AKT Investments | Fueling Station/Carwash | EC-Low Rise (FAR: 0.15-1.0) | HC | 3.0 | 6,690 | 0.05 | Calculated | 8,100 |
| 7A | NorthPoint / AKT Investments | Hotel | EC-Low Rise (FAR: 0.15-1.0) | HC | 4.0 | 40,000 | 0.35 | Calculated | 74,900 |
| 7B | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 1.5 | 3,200 | 0.05 | Calculated | 3,900 |
| 7C | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 1.3 | 6,050 | 0.07 | Calculated | 5,000 |
| Subtotal Retail Commercial | | | | | 13.4 | 80,940 | 0.14 | Average | 98,200 |
| A | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 8.5 | ----- | ----- | ----- | ----- |
| B | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 54.0 | ----- | ----- | ----- | ----- |
| C | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 12.1 | ----- | ----- | ----- | ----- |
| D | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 10.5 | ----- | ----- | ----- | ----- |
| E | NorthPoint / AKT Investments | Buffer | Industrial | M-1 | 2.3 | ----- | ----- | ----- | ----- |
| F | NorthPoint / AKT Investments | Sewer Pump Station | Industrial | M-1 | 0.5 | ----- | ----- | ----- | ----- |
| G | NorthPoint / AKT Investments | Drainage Pump Station | Industrial | M-1 | 0.4 | ----- | ----- | ----- | ----- |
| Subtotal Public Facilities | | | | | 89.2 | ----- | ----- | ----- | ----- |
| Subtotal Internal Roadways | | | | | 15.3 | ----- | ----- | ----- | ----- |
| Total for Applicant Sponsored Lands | | | | | 393.5 | 4,769,380.0 | 0.31 | Average | 5,392,700.0 |
| Future Industrial Lands | | | | | | | | | |
| 8 | Caltrans | Future Industrial | Industrial | M-1 | 64.3 | 980,318 | 0.35 | Estimated | 1,088,200 |
| 9 | Campbell | Future Industrial | Industrial | M-1 | 6.5 | 99,099 | 0.35 | Estimated | 110,000 |
| 10 | Isurur | Future Industrial | Industrial | M-1 | 4.6 | 70,132 | 0.35 | Estimated | 77,900 |
| 11 | Patel | Future Industrial | Industrial | M-1 | 0.7 | 10,479 | 0.35 | Estimated | 11,900 |
| Caltrans Remnant | | | | | 6.9 | 105,422 | 0.35 | Estimated | 118,800 |
| Subtotal | | | | | 83.0 | 1,265,418 | 0.35 | Check Average | 1,404,600 |
| Subtotal Developable Lands (Warehousing/Distribution) | | | | | 318.6 | 5,853,836 | 0.43 | Average | 6,699,300 |
| Subtotal Developable Lands (Highway Commercial) | | | | | 13.4 | 80,940 | 0.14 | Average | 98,200 |
| Subtotal Developable Lands (Public Facilities and Internal Roadways) | | | | | 104.5 | ----- | ----- | ----- | ----- |
| Total Developable Lands | | | | | 436.5 | 6,034,798 | 0.32 | Average | 6,797,500 |
| Caltrans I-5 Fee Title R/W | | | | | 37.9 | ----- | ----- | ----- | ----- |
| Grand Total | | | | | 474.4 | ----- | ----- | ----- | ----- |



THIS SITE PLAN IS FOR PRELIMINARY PLANNING PURPOSES ONLY AND SUBJECT TO CHANGE PRIOR TO FINAL APPROVAL.

WOOD RODGERS
 BUILDING RELATIONSHIPS ONE PROJECT AT A TIME
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 Sacramento, CA 95818
 Tel 916.341.7760
 Fax 916.341.7767



Prezoning

In accordance with the Cortese-Knox-Hertzberg Local Government Reorganization Act (see Government Code Section 56375), City of Sacramento zoning designations would be applied to the industrial park footprint and nonparticipating parcels through Prezoning. The industrial park portion of the project site would be Prezoned to include 317.9 acres of Industrial PUD (M-1-PUD) zoning and 13.4 acres Highway Commercial PUD (HC-PUD) zoning. The nonparticipating parcels would be Prezoned to include 83 acres of Industrial (M-1).

Planned Unit Development

As detailed in Section 17.452.010 of the City's Municipal Code, the purpose of a PUD is to provide greater flexibility in the design of integrated developments than otherwise possible through strict application of zoning regulations. With respect to industrial development, a PUD allows for well-designed and controlled groupings of research, service, or light industrial uses within an area containing visual and operational amenities and features, such as selective occupancies, setbacks, landscaping, and bulk and building material controls.

The proposed project includes PUD Guidelines related to the proposed M-1-PUD and HC-PUD zoning. The PUD Guidelines include regulations and standards for permitted/prohibited uses, site design, building design, landscaping/visual screening, signage, and lighting.

Tentative Master Parcel Map

The requirements for Master Parcel Maps are set forth in Chapter 17.836 of the City's Municipal Code. As established in Section 17.836.020 of the Municipal Code, the purpose and intent of the Master Parcel Map process is to allow subdivision of land to correspond to General Plan and applicable community plan land use designations and infrastructure elements without allowing the creation of individual residential lots. For nonresidential property, while the master parcel map process may create parcels which may or may not be subdivided further, no building may be undertaken on any master parcel unless and until all other required discretionary entitlements have been lawfully obtained, as required by applicable land use and development regulations.

According to Section 17.836.030 of the City's Municipal Code, before land may be divided by a Master Parcel Map, a Tentative Master Parcel Map must be submitted. The proposed project includes a Tentative Master Parcel Map that divides the project site into 18 parcels for the proposed Industrial Park development and four nonparticipating parcels. The parcels allow for the following uses:

Industrial Uses

The total estimated square footage of industrial buildings would be 5,204,500 sf within five parcels totaling 235.6 acres. As shown in Figure 3-3, Parcels 1 through 4, all planned for industrial use, generally surround the proposed retail/highway commercial uses; Parcel 5, the remaining proposed industrial use, would be located in the northeast corner of the site. The area of each of the aforementioned parcels and associated warehouse buildings would be as follows:

- Parcel 1: 47.7 acres, 979,400-sf building;
- Parcel 2: 53.4 acres, 1,335,200-sf building;
- Parcel 3: 34.4 acres, 772,900-sf building;
- Parcel 4: 54.7 acres, 1,335,200-sf building; and
- Parcel 5: 45.4 acres, 781,800-sf building.



Each industrial building would include driveways and associated parking areas to accommodate vehicles and/or trailers, as well as stormwater retention/detention areas to capture stormwater runoff from the newly constructed impervious surfaces and to provide mitigation for existing stormwater storage.

While the future tenants of the proposed industrial buildings are not currently known, a large segment of the current retail market consists of regional suppliers, such as Amazon and Walmart, that deliver goods directly to consumers. As such, a strong need exists for light industrial warehousing to act as fulfillment centers for regional retailers. With the site's close proximity to I-5, I-80, SR 99, the Sacramento International Airport, and the highly developed urban center of the City to the east and northeast, the project site is well-suited for this purpose and for the proposed highway commercial uses. In addition, each use would be required to comply with all regulations and standards established by the PUD.

Commercial Uses

The commercial component of the proposed project would include six lots comprised of approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality, on approximately 13.4 acres. All six retail/highway commercial lots would be clustered south of the intersection of I-5 and Metro Air Parkway, near the center of the project site. Parcels 6A through 6C would be located west of the planned internal roadway, and Parcels 7A through 7C would be located to the east. The area of each of the aforementioned parcels and associated commercial buildings would be as follows:

- Parcel 6A: 2.1 acres, 3,900-sf restaurant building;
- Parcel 6B: 1.5 acres, 3,900-sf restaurant building;
- Parcel 6C: 3.0 acres, 8,100-sf fueling station/carwash;
- Parcel 7A: 4.0 acres, 73,400-sf hotel building;
- Parcel 7B: 1.5 acres, 3,900-sf restaurant building; and
- Parcel 7C: 1.3 acres, 5,000-sf restaurant building.

Nonparticipating Parcels

The proposed project includes several nonparticipating parcels comprised of approximately 83 acres, which would receive first-tier entitlements, such as the proposed SOI Amendment to amend the City of Sacramento SOI and Annexation of the site into the City limits and SacSewer service area, for future industrial uses of approximately 1,404,800 sf. These future development areas include six existing parcels controlled by separate owners, which are summarized as follows:

- Parcel 8: 64.3 acres (Cayocca);
- Parcel 9: 6.5 acres (Campbell);
- Parcel 10: 4.6 acres (Isgur Trust); and
- Parcel 11: 0.7-acre (Patel).

In addition, the nonparticipating parcels include 6.9 acres of Caltrans Remnant ROW. The Caltrans Remnant ROW has been included as developable because it may be a candidate for future private acquisition. The parcels would receive General Plan and Prezoning designations as part of the City process. Any development proposed for these sites would require additional entitlement requests and review pursuant to CEQA.



Access and Circulation

Access to the project site would be provided from the north by Metro Air Parkway, which would connect to the proposed Airport South Industrial Drive. The proposed project would include abandonment of the existing South Bayou Way within the project limits, and replacement with a new internal roadway system. Concurrent with abandonment, an access easement would be dedicated over the eastern segment of South Bayou Way (from a proposed cul-de-sac to the new round-a-bout) to serve future industrial Parcels 9-11, and the Caltrans Remnant.

In order to guide truck traffic directly to I-5 and limit traffic impacts to Bayou Way east of the project site, the project would be served by a new internal roadway system including Airport South Industrial Drive, a modified two-lane Local Industrial roadway with a 75-foot-wide ROW, that would bisect the property west to east by connecting Power Line Road to a future street (labeled “A” Drive in Figure 3-3) that would run north along the site’s eastern border and connect to a proposed round-a-bout where Bayou Way meets the project site. It is anticipated that the round-a-bout will have signage and be configured to prohibit off-site truck traffic from the project site, east and south along Bayou Way/El Centro Road to Del Paso Road. Metro Air Parkway, a modified four-lane Local Industrial roadway with a 97-foot-wide ROW, would be extended south from the existing I-5 interchange to the proposed Airport South Industrial Drive, providing a direct connection for trucks.

Utilities and Service Systems

The project site does not currently include utilities infrastructure; however, the proposed project would include water, sanitary sewer, and stormwater improvements, which would connect to existing infrastructure in the project vicinity.

Sanitary sewer service for the proposed project would be provided by SacSewer. The proposed project would include installation of new eight-inch sewer lines within the project site’s parcels, which would convey flows to a new sewer line in Airport South Industrial Drive that would range in diameter between 12 and 18 inches. From the sewer line in Airport South Industrial Drive, flows would be directed to a new pump station sited within Lot F. From the new pump station, flows would be conveyed to the existing 48-inch SacSewer North Natomas interceptor line in East Commerce Way by way of a new off-site force main that would extend from the northeast corner of the site and proceed off-site towards the south within Bayou Way and El Centro Road. At the El Centro Road/Del Paso Road intersection, the off-site force main would connect to the North Natomas interceptor line through one of three options, which are discussed further under the Off-Site Improvements heading below. From the North Natomas interceptor, wastewater flows from the project site would be conveyed to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment.

The site is contiguous to the City’s current retail water service area, which is coterminous with the City limits. Following annexation, the City would be responsible for providing potable water to the proposed project. The proposed project would connect to an existing City 30-inch water transmission main that terminates near the east end of the proposed project site in South Bayou Way. This 30-inch transmission main was extended from a metering station that is currently located directly east of the project site in South Bayou Way to “wheel” City of Sacramento water to the west and north to County of Sacramento lands, namely Sacramento International Airport and the Metro Air Park. The project site has existing County of Sacramento transmission mains through the project in South Bayou Way. The County T-mains continue west of the Project to a dual 1.4 MG County Zone 50 Water Tank site located on the west side of Power Line Road. It is



currently proposed that this County system continue to operate as a separate system and that a separate City-operated and maintained water distribution system connected to the City 30-inch T-Main “upstream” of the City/County metering station be constructed on site, as well as other points of connection to the City water system.

Storm drainage for the project site would be provided by the City of Sacramento and Reclamation District (RD) 1000. RD 1000 owns and operates the existing canals and pump stations in the project vicinity that move storm drainage from the local area to the Sacramento River. The City would own and operate the future on-site system that would detain and/or retain storm drainage runoff prior to discharge into the RD 1000 System.

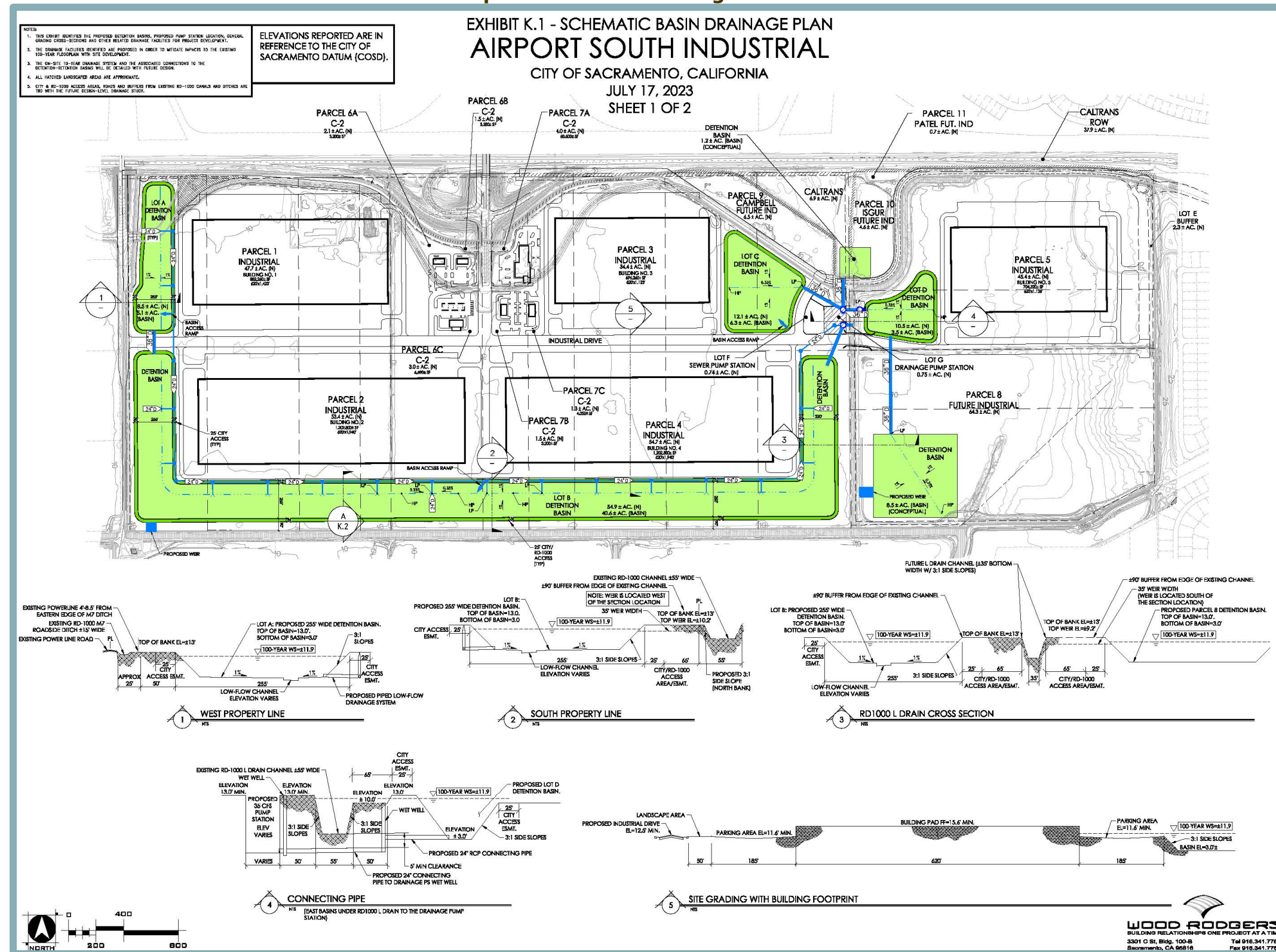
Off-site runoff would enter the project site along Reach 8 of the Lone Tree Canal, which flows through three box culverts within I-5 to the north, and extends south, bisecting the easternmost one-third of the project site. The Lone Tree Canal then flows south, through the site, to join the West Drainage Canal located along the south boundary of the project site. Where the Lone Tree Canal and the West Drainage Canal intersect, drainage runoff can either flow east and south to Pumping Plant 3 on the Sacramento River, or west and northwest to Pumping Plant No. 5 on the Sacramento River. The RD 1000 system in the Lone Tree Canal and West Drainage Canal has a permanent backwater condition whereby the canals contain water at all times of the year.

The proposed project would include an on-site storm drain system composed of post construction stormwater quality measures such as Low Impact Development (LID) components, dedication of landscaping areas, and six on-site detention basins. Runoff from on-site impervious surfaces would be captured by the on-site stormwater drainage system consisting of a series of detention basins located adjacent to the RD 1000 ditches and canals that border the western and southern boundaries of the project site, and areas adjacent to the RD 1000 L Drain (which bisects the eastern portion of the project site) (see Figure 3-4). The basins would each be interconnected with 36-inch diameter culvert(s) or larger in order to provide a single continuous system. The basins would be connected to the RD 1000 system through weirs to meet the pre-project spill conditions and to provide on-site floodplain storage. The on-site stormwater drainage system would be controlled by a pump station currently planned to be located near the intersection of the RD 1000 L Drain and the proposed Airport South Industrial Drive. A low-flow pump may also be incorporated to maintain the flood control depth needed in the basin for the winter months, or as needed to keep the basins drawn down in the summer months. The proposed detention/retention basins are discussed in further detail in Chapter 4.8, Hydrology and Water Quality, of this EIR.

The project is located in two Special Flood Hazard Areas (SFHA), designated as A99 and A zones on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs). The project site lies within a local 100-year floodplain based on basin-wide modeling prepared by RD 1000. As such, the project site, in the current undeveloped state, provides storage of floodwaters during the 100-year storm. In order to develop the property and remove the floodplain, the developed area of the site would need to be raised above the floodplain. Given the approximate depth of inundation, building finished floors would need to be raised. Furthermore, parking areas would need to be elevated to limit the 100-year flood depth as much as practical, and must comply with the City Department of Utilities Onsite Design Manual. The lost storage would also need to be compensated. The detention/retention basins located on the outer boundaries of the project site, labeled as Lots A through D in Figure 3-4, have been designed to make up for the lost storage volume.



**Figure 3-4
 Proposed On-Site Drainage Conditions**



Electrical service would be provided by the Sacramento Municipal Utility District (SMUD). SMUD has facilities in the vicinity of the project. To the extent allowed under the City's recent electrification ordinance, natural gas would be provided by Pacific Gas and Electric (PG&E), which also has facilities in the vicinity of the project. Telecommunication and other tech service providers will be determined and included in their services to the project.

Off-Site Improvements

The proposed project would require construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch SacSewer North Natomas interceptor line in East Commerce Way (see Figure 3-5). As previously discussed, the off-site force main would extend from the northeast corner of the site and proceed off-site towards the south within Bayou Way and El Centro Road. At the El Centro Road/Del Paso Road intersection, the off-site force main would connect to the North Natomas interceptor line through one of three of the following options:

- **Option 1:** From the El Centro Road/Del Paso Road intersection, Option 1 would include installation of the force main within a City highway buffer parallel with the westerly side of I-5. About 0.5-mile south of Del Paso Road, the Option 1 alignment would cross under I-5 within City ROW and then discharge into the North Natomas interceptor line within East Commerce Way.
- **Option 2:** From the El Centro Road/Del Paso Road intersection, Option 2 would route the force main north of the I-5 on/off ramps, cross under I-5, and then proceed within Del Paso Road towards East Commerce Way.
- **Option 3:** From the El Centro Road/Del Paso Road intersection, Option 3 would route the force main south of the I-5 on/off ramps, cross under I-5, and then proceed eastward towards East Commerce Way.

Development Agreement

As defined in Section 18.16.020 of the City's Municipal Code, the Development Agreement would allow the City and the applicant to enter into an agreement to assure the City that the proposed project would be completed in compliance with the plans submitted by the applicant and assure the applicant of vested rights to develop the project.

3.6 REQUIRED PUBLIC APPROVALS

Sacramento LAFCo and the City of Sacramento have discretionary authority and each are the lead agencies for different aspects of the proposed project, as discussed in Chapter 1, Introduction, of this EIR. In addition to certification of this EIR and the associated Mitigation Monitoring and Reporting Program, the proposed project requires the following approvals by Sacramento LAFCo:

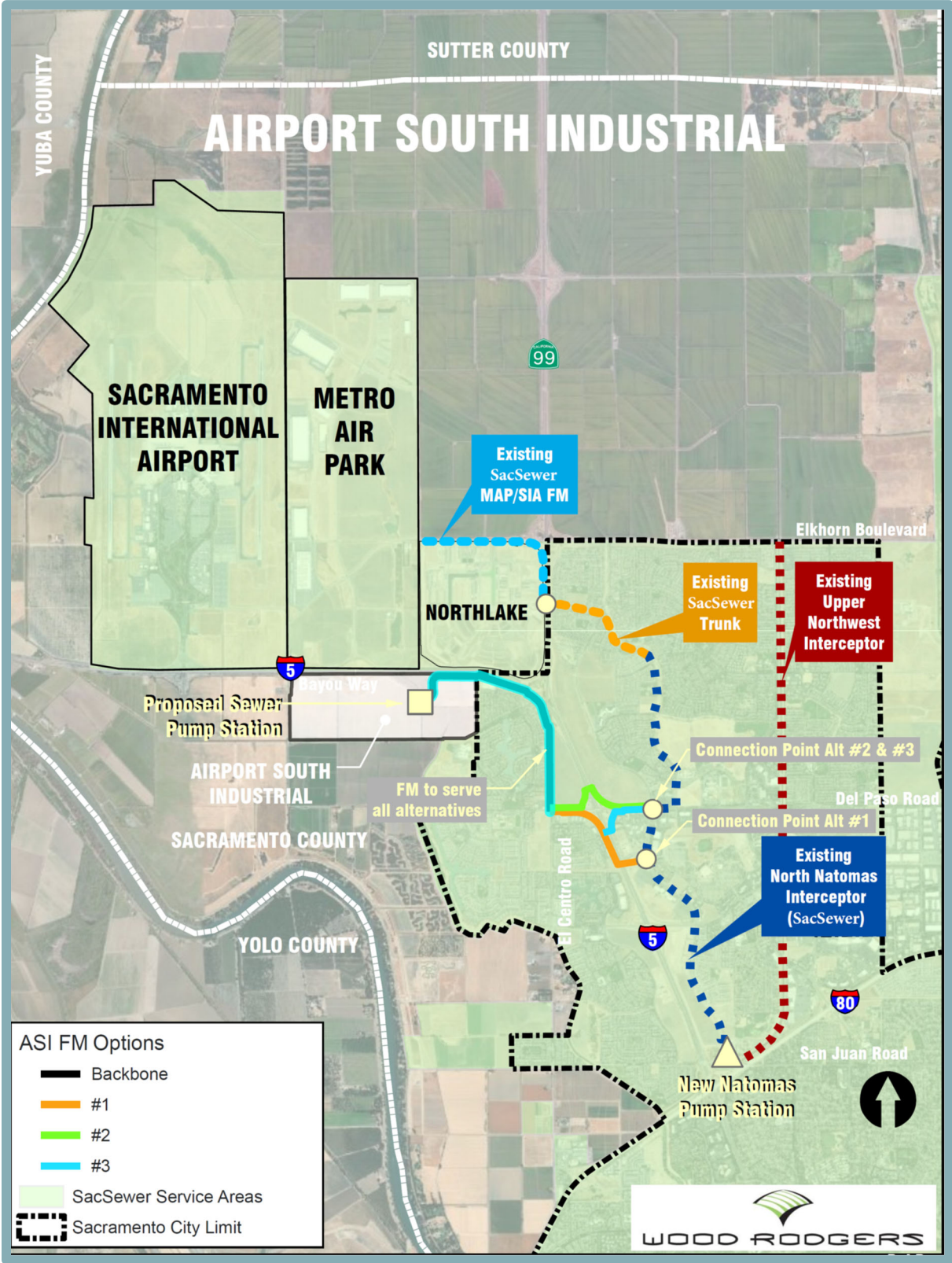
- SOI Amendment to include the project site within the City of Sacramento SOI; and
- Annexation of the project site into the Sacramento City limits and SacSewer service area.

The proposed project requires the following approvals by the City of Sacramento:

- GPA of the City of Sacramento 2040 General Plan to include the boundaries of the industrial park footprint and nonparticipating parcels (total of 414.3 acres – not including roadways) as Employment Mixed-Use;



**Figure 3-5
 Off-Site Force Main and Sewer Alignment Options**



- Rezoning of 317.9 acres (not including roadways) to M-1-PUD and 13.4 acres (not including roadways) to HC-PUD for the industrial park portion of the site, and 83 acres to M-1 for the nonparticipating parcels;
- PUD (Schematic Plan and PUD Guidelines)
- Tentative Master Parcel Map;
- Development Agreement;
- Finance Plan; and
- Property Tax Exchange Agreement (with County of Sacramento).

Review or Approvals by Other Agencies

A number of other agencies will serve as Responsible and Trustee Agencies, pursuant to CEQA Guidelines Section 15381 and Section 15386, respectively. This EIR will provide environmental information to these agencies and other public agencies, which may be required to grant approvals or coordinate with other agencies, as part of project implementation. These agencies could include, but may not be limited to, the following:

- California Department of Fish and Wildlife (CDFW);
- United States Army Corps of Engineers (USACE);
- United States Fish and Wildlife Service (USFWS);
- Central Valley Regional Water Quality Control Board (RWQCB);
- Caltrans;
- PG&E;
- SMUD;
- RD 1000 (reclamation district);
- SacSewer; and
- Sacramento Area Council of Governments Board of Directors (SACOG Airport Land Use Commission).



4. EXISTING ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

4.0 INTRODUCTION TO THE ANALYSIS

4.0 INTRODUCTION TO THE ANALYSIS

4.0.1 INTRODUCTION

The technical chapters of the EIR analyze the potential impacts of buildout of the proposed project on a range of environmental issue areas. Chapters 4.1 through 4.13 of the EIR describe the environmental setting related to each specific issue area, method of analysis, project-specific impacts and mitigation measures, and a cumulative impact analysis for each issue area. The format of each of the technical chapters is described at the end of this chapter. It should be noted that all technical reports are either attached to this EIR, available by request from the City, or available on the City's website at:

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

4.0.2 DETERMINATION OF SIGNIFICANCE

Under CEQA, a significant effect is defined as a substantial or potentially substantial adverse change in the environment (Public Resources Code [PRC] Section 21068). The CEQA Guidelines require that the determination of significance be based on scientific and factual data. The specific criteria for determining the significance of a particular impact are identified within in each technical chapter and are consistent with significance criteria set forth in the CEQA Guidelines or as based on the professional judgment of the EIR preparers.

Significance Criteria

The CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.” In addition, the Guidelines state, “An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” (CEQA Guidelines Section 15382).

As presented in Section 4.0.4 below, the level of significance of an impact prior to mitigation is included at the end of each impact discussion throughout the technical chapters of this EIR. The following levels of significance prior to mitigation are used in this EIR:

- 1) Less than Significant: Impacts that may be adverse, but that do not exceed the specified thresholds of significance;
- 2) Significant: Impacts that exceed the defined standards of significance and require mitigation;
- 3) Less than Cumulatively Considerable: Where cumulative impacts have been identified, but the project's incremental contribution towards the cumulative impacts would not be considered significant; and
- 4) Cumulatively Considerable: Where cumulative impacts have been identified and the project's incremental contribution towards the cumulative impacts would be considered significant.



If an impact is determined to be significant or cumulatively considerable, mitigation is included, if available, in order to reduce the specific impact to the maximum extent feasible. A statement of the level of significance of an impact after mitigation is also included in each impact discussion throughout the technical chapters of this EIR. The following levels of significance after implementation of mitigation are used in the EIR:

- 1) **Less than Significant:** Impacts that exceed the defined standards of significance but can be eliminated or reduced to a less-than-significant level through the implementation of feasible mitigation measures;
- 2) **Less than Cumulatively Considerable:** Where the project's incremental contribution towards cumulative impacts would be eliminated or reduced to a less than cumulatively considerable level through the implementation of feasible mitigation measures; and
- 3) **Significant and Unavoidable Impact:** An impact (project-level or cumulative) that cannot be eliminated or reduced to a less-than-significant or less than cumulatively considerable level through the implementation of feasible mitigations measures.

Each environmental area of analysis uses a distinct set of significance criteria. The significance criteria are identified at the beginning of the Impacts and Mitigation Measures section in each of the technical chapters of this EIR. Although significance criteria are necessarily different for each resource considered, the provided significance levels ensure consistent evaluation of impacts for all resource areas evaluated.

4.0.3 ENVIRONMENTAL ISSUES ADDRESSED IN THIS EIR

The EIR provides the analysis necessary to address the technical environmental impacts of the proposed project. The following environmental issues are addressed in the separate technical chapters of this EIR:

- Aesthetics;
- Agricultural Resources;
- Air Quality, Greenhouse Gas Emissions, and Energy;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning/Population and Housing;
- Noise;
- Public Services, Utilities, and Service Systems;
- Transportation; and
- Tribal Cultural Resources.

Chapter 5, Effects Not Found to be Significant, will address the project's effects that were determined not to be significant, and, thus, were not discussed in detail in a technical chapter of the EIR. See Section 6.3, Cumulative Impacts, of Chapter 6, Statutorily Required Sections, for additional information on the scope of the cumulative impact analysis for each environmental issue addressed in the EIR.



4.0.4 TECHNICAL CHAPTER FORMAT

Each technical chapter addressing a specific environmental issue begins with an **introduction** describing the purpose of the section. The introduction is followed by a description of the project's **existing environmental setting** as the setting pertains to that particular issue. The setting description is followed by the **regulatory context** and the **impacts and mitigation measures** discussion, which contains the **standards of significance**, followed by the **method of analysis**. The standards of significance section includes references to the specific checklist questions consistent with Appendix G of the CEQA Guidelines. The **impacts and mitigation measures** discussion includes impact statements prefaced by a number in bold-faced type (for both project-specific and cumulative analyses). An explanation of each impact and an analysis of the impact's significance follow each impact statement. All mitigation measures pertinent to each individual impact follow directly after the impact statement (see below). The degree of relief provided by identified mitigation measures is also evaluated. An example of the format is shown below.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in comparison with the standards of significance.

4.x-1 Statement of Project-Specific Impact

Discussion of impact for the proposed project in paragraph format.

Statement of **level of significance** of impact prior to mitigation is included at the end of each impact discussion. The following levels of significance are used in the EIR: less than significant, significant, or significant and unavoidable. If an impact is determined to be significant, mitigation will be included in order to reduce the specific impact to the maximum extent feasible. Impacts that cannot be reduced to a less-than-significant level with implementation of all feasible mitigation would be considered to remain significant and unavoidable.

Mitigation Measure(s)

Statement of *level of significance* after the mitigation is included immediately preceding mitigation measures.

4.x-1(a) *Required mitigation measure(s) presented in italics and listed in consecutive order.*

4.x-1(b) *Required additional mitigation measure, if necessary.*

Cumulative Impacts and Mitigation Measures

The following discussion of cumulative impacts is based on implementation of the proposed project in combination with cumulative development within the applicable area or region.

4.x-2 Statement of Cumulative Impact

Discussion of cumulative impacts for the proposed project in paragraph format.



As discussed in detail in Chapter 6, Statutorily Required Sections, of the EIR, the cumulative setting for the proposed project is generally considered to be a summary of projections contained in the City of Sacramento 2040 General Plan and the Sacramento County General Plan.

Statement of **level of significance** of cumulative impact prior to mitigation is included at the end of each impact discussion. The following levels of significance are used in the EIR for cumulative impacts: less than significant, less than cumulatively considerable, cumulatively considerable, or significant and unavoidable. If an impact is determined to be cumulatively considerable, mitigation will be included in order to reduce the specific impact to the maximum extent feasible. Impacts that cannot be reduced to a less-than-significant or less than cumulatively considerable level with the implementation of all feasible mitigation would be considered to remain significant and unavoidable.

Mitigation Measure(s)

Statement of *level of significance* after the mitigation is included immediately preceding mitigation measures.

4.x-2(a) *Required mitigation measure(s) presented in italics and listed in consecutive order.*

4.x-2(b) *Required additional mitigation measure, if necessary.*



4.1 AESTHETICS

4.1 AESTHETICS

4.1.1 INTRODUCTION

The Aesthetics chapter of the EIR describes the existing visual resources of the project site and vicinity. The CEQA Guidelines describe the concept of aesthetic resources in terms of scenic vistas, scenic resources (including trees, rock outcroppings, and historic buildings), scenic highways, visual character or quality of public views of the project site, and light and glare. Information for the chapter has been primarily drawn from the City of Sacramento 2040 General Plan,¹ the City of Sacramento 2040 Master EIR (MEIR),² the Sacramento County General Plan,³ and the associated EIR.⁴

The analysis within this chapter will focus primarily on impacts related to public views, rather than private views. Private views are views seen from privately-owned land and are typically viewed by individual viewers, including views from private residences. Public views are views that are experienced by the collective public. CEQA (Public Resources Code [PRC], Section 21000 et seq.) case law has established that only public views, not private views, are protected under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720 [3 Cal. Rptr.2d 488] the court determined that “we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188 [129 Cal.Rptr. 739]: “[A]ll government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general.” This conclusion is consistent with the thresholds of significance established in Appendix G of the CEQA Guidelines. Therefore, it is appropriate to focus the aesthetic impact analysis on potential impacts to public views, rather than private views.

As discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

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

² City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.

³ Sacramento County. *Sacramento County General Plan of 2005 – 2030*. Amended through October 25, 2022.

⁴ Sacramento County. *Sacramento County General Plan Update Final Environmental Impact Report*. April 2010.



Concepts and Terminology

The following terms are used throughout this chapter and have important bearing upon properly evaluating aesthetics within the context of the CEQA. As a result, this section begins by providing definitions of key terms, as follows:

A “viewshed” is all of the surface area visible from a particular location or sequence of locations (e.g., roadway or trail).

“Visual character” pertains to the order of patterns composing a landscape. The elements of these patterns are the form, line, color, and texture of the landscape’s visual resources.

- **Form:** The unified mass or shape of an object that often has an edge or outline and can be defined by surrounding space. For example, a high-rise building would have a highly regular, rectangular form whereas a hill would have an organic, mounded form.
- **Line:** Perceived when there is a change in form, color, or texture and where the eye generally follows this pathway because of the visual contrast. For example, a city’s high-rises can be seen silhouetted against the blue sky and be seen as a skyline, a river can have a curvilinear line as it passes through a landscape, or a hedgerow can create a line where it is seen rising up against a flat agricultural field.
- **Color:** The light reflecting off of an object at a particular wavelength that creates hue (green, indigo, purple, red, etc.) and value (light to dark hues).
- **Texture:** The perceived coarseness of a surface that is created by the light and shadow relationship over the surface of an object. For example, a rough surface texture (e.g., a rocky mountainside) would have many facets resulting in a number of areas in light and shadow and, often, with distinct separations between areas of light and shadow. Conversely, a smooth surface texture (e.g., a beach) would have fewer facets, larger surface areas in light or shadow, and gradual gradations between light and shadow.

“Distance zones” are based on the position of the viewer in relationship to the landscape. Views might be discussed in terms of foreground, midground, and background views. Foreground views are those immediately presented to the viewer, and include objects at close range that could tend to dominate the view. Midground views occupy the center of the viewshed and tend to include objects that are the center of attention if they are sufficiently large or visually different from adjacent visual features. Background views include distant objects and other objects that make up the horizon. Objects in the background fade to obscurity with increasing distance. In the context of the background, the skyline can be an important location because objects above this point are highlighted against the background of the sky.

“Scenic vista” is defined as an area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, State, or local agency.

“Scenic highway” is defined as any stretch of public roadway that is designated as a scenic corridor by a federal, State, or local agency.

“Visual resources” are the visible features that make up the landscape, including but not limited to cultural or human-made components such as buildings and other structures, linear elements (e.g., ridgelines, landforms, roads), greenscapes such as agricultural crops, or natural resources such as waterways and forest/woodland.



“Visual Quality”, as defined by the Federal Highway Administration (FHWA),⁵ describes what viewers like and dislike about visual resources that compose the visual character of a particular scene. Different viewers may evaluate specific visual resources differently based on their interests in the types of visual resources comprising a particular landscape.

4.1.2 EXISTING ENVIRONMENTAL SETTING

The following setting information provides an overview of the existing conditions of the project site and surrounding area in relation to visual resources.

Visual Character of Regional Environment

Sacramento County lies near the center of California’s Central Valley, at the southern end of the Sacramento Valley. Aesthetic views within the valley region are generally characterized by broad sweeping panoramas of flat agricultural lands and open space dotted with trees, divided by numerous rivers and creeks, and populated with scattered towns and cities. To the east, the Sierra Nevada and their foothills form a background, and the Coast Range provides a backdrop on the western horizon.

The City of Sacramento is located at the confluence of the Sacramento and American rivers. These river corridors create two of the primary natural scenic resources of the City. The Sacramento River is situated in a north/south direction, and serves as the western boundary for much of the City. The American River flows eastward through the City and meets the Sacramento River near the City’s western boundary. The American River Parkway, an open space greenbelt/riparian corridor, extends 29 miles from the confluence of the Sacramento River east to Folsom Dam. The two rivers provide recreational opportunities, create a permanent visual break in the pattern of urban development, and provide scenic contrast and interest in the City.

The American River is designated as a recreational river under the Wild and Scenic Rivers Act from the confluence with the Sacramento River to Nimbus Dam, located just east of the City. This prohibits Federal construction, assistance, or licensing of water projects “adversely affecting the characteristics qualifying the river for the national system.”⁶ This designation recognizes the importance of recreational opportunities and preservation of the river’s natural qualities.

Open space provides visual relief from urbanized areas, including views for residents, motorists, and pedestrians. Because a majority of Sacramento is currently developed or planned for development, open space within the City is provided in the form of conserved lands, parks, agricultural land, and vacant lands.

Visual Character of Local Environment

The following information provides an overview of the existing visual character of the local environment, including the project site and immediate vicinity.

The visual resources on the project site consist primarily of disced fields marked by earth tones of the topsoils. Scattered trees and bushes grow in the northeastern portion of the project site,

⁵ Federal Highway Administration. *Guidelines for the Visual Impact Assessment of Highway Projects* (Publication No. FHWA-HEP-15-029). January 2015. Although the FHWA guidelines were initially created to provide an analytical framework for identifying and assessing qualitative changes to the visual environment that could be introduced as part of a transportation project, this methodology has become an industry standard for evaluating visual impacts associated with local and state non-transportation projects as well.

⁶ Sacramento County. *Sacramento County General Plan of 2005 – 2030*. Amended November 9, 2011.



near an unnamed drainage canal. In addition, a portion of Bayou Way is located within the project site and is generally laid out in an east-to-west direction. The project site does not contain any existing structures.

The existing visual resources of the immediate project vicinity are mostly characterized by agricultural lands to the south, west, and north, across Interstate 5 (I-5). The Paso Verde K-8 School is located south of the easternmost corner of the project site, and the Life Storage facility and the Westlake single-family residential subdivision are located immediately east of the project site. In addition, the Sacramento International Airport, Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision are located to the north, across I-5 and past the intervening agricultural land.

Viewer Types

For the purposes of this analysis, individuals in the vicinity with views of the project site that may be affected by the proposed project are categorized as follows:

- **Motorists** along I-5, Power Line Road, and Bayou Way have direct views as they pass the site. Views from the access roadway between the Paso Verde K-8 School and Egret Park (hereafter referred to as Access Roadway) are moderately obstructed by an existing vegetative berm. Views are available to motorists commuting or touring, hauling trucks, as well as pedestrians and bicyclists along Power Line Road, Bayou Way, and Access Roadway, who have direct views for longer period of time as they pass the site. However, because I-5, Power Line Road, and Bayou Way do not include paved shoulders or sidewalks, bicycle and pedestrian traffic along the project frontages of these roads is limited. Conversely, Access Roadway is designed exclusively for pedestrian and bicycle use.
- **Neighbors**⁷ are considered those who temporarily or permanently occupy land adjacent or visible to the project site and can be defined as residential, commercial, industrial, agricultural, civic, and recreational neighbors. Views of the site from the Life Storage facility and the residential neighbors east of the project site are moderately obstructed due to an intervening vegetative berm and other vegetation. Similarly, views of the site from the Paso Verde K-8 School, southeast of the project site, are partially obstructed by an existing vegetative berm.

Specifically, motorists and pedestrians on I-5, Power Line Road, Bayou Way, and Access Roadway have publicly available views of the site, whereas neighbors have private views.

Existing Visual Quality of the Project Site

Visual quality is the experience of having pleasing visual perceptions. In other words, what people like and dislike about the visual character of the area.⁸ Different viewers may value visual resources in different ways and come to varying conclusions about visual quality. Generally, natural open views, unobstructed by cultural (i.e., human-made) structures/features are preferred. Table 4.1-1 below identifies three categories of visual quality: high, moderate, and low.

⁷ The term *neighbor* does not always mean that a person resides adjacent to the project site. Rather, it refers to people who may see it from their geographic location.

⁸ Federal Highway Administration. *Guidelines for the Visual Impact Assessment of Highway Projects* (Publication No. FHWA-HEP-15-029) [pg. 5-11]. January 2015.



When viewing a scene’s environment, viewers inherently evaluate the visual quality of the existing scene, determining if the composition is harmonious. Using the evaluation table, the visual quality of the overall project site is relatively moderate/average quality considering that the agricultural setting of the project site is somewhat memorable and its unity forms a perceivable pattern. Agricultural crops, while a result of human activity, are comprised of vegetation that can provide harmony with a uniform texture and color if relatively uninterrupted by above-ground farm structures, as is the case for the project site. Given that striking visual patterns and distinct focal points are absent from the project site, the visual quality of the site is not considered to be high, but rather moderate.

| High Quality | Moderate/Average Quality | Low Quality |
|---|--|---|
| <ul style="list-style-type: none"> • Highly memorable. • Elements combine in striking visual patterns. • Presence of distinct focal point(s). • Lack of man-made development does not disrupt the natural landscape. • Minimal to no encroachments to the landscape are visible. | <ul style="list-style-type: none"> • Somewhat memorable. • Elements form perceivable pattern(s). • Man-made development and the natural landscape are disturbed and encroach on the visual setting. | <ul style="list-style-type: none"> • Not vivid. • Elements appear random with no perceivable pattern(s). • The landscape has encroaching elements that create an eyesore to viewers. |

While human-made development encroaches on the visual setting, these relatively minor encroachments do not pose an eyesore. Human-made elements on the project site consist of unnamed drainage canals that proceed through the site generally in a north-to-south direction in both the site’s western and eastern portions. All such drainage canals are below grade and are not visible from the surrounding viewpoints.

Generally, the project site does not contain any distinct visual characteristics that are unique from other agricultural lands within the County, the City, or the surrounding region. The overall visual quality of the project site is considered moderate/average quality.

Determination of Key Public Viewpoints

Key views are those public views that provide an image that captures the existing visual character and visual quality of the landscape unit that would be altered by the proposed project. In the case of the proposed project, public views would consist of views from I-5, Power Line Road, Bayou Way, and Access Roadway in the project vicinity. Private views of the project site would consist of views from the residential uses and the Paso Verde K-8 School, east of the project site. Figure 4.1-1 provides a location and direction of each of the photos provided in Figure 4.1-2 through Figure 4.1-5. Figure 4.1-2 and Figure 4.1-4 provide examples of public views of the site from I-5, and Figure 4.1-3 shows views from Metro Air Parkway. Figure 4.1-5 shows views from Access Roadway, as well as the neighboring residential subdivision and the Paso Verde K-8 School.



**Figure 4.1-1
Overview Map of Key Viewpoint Locations**

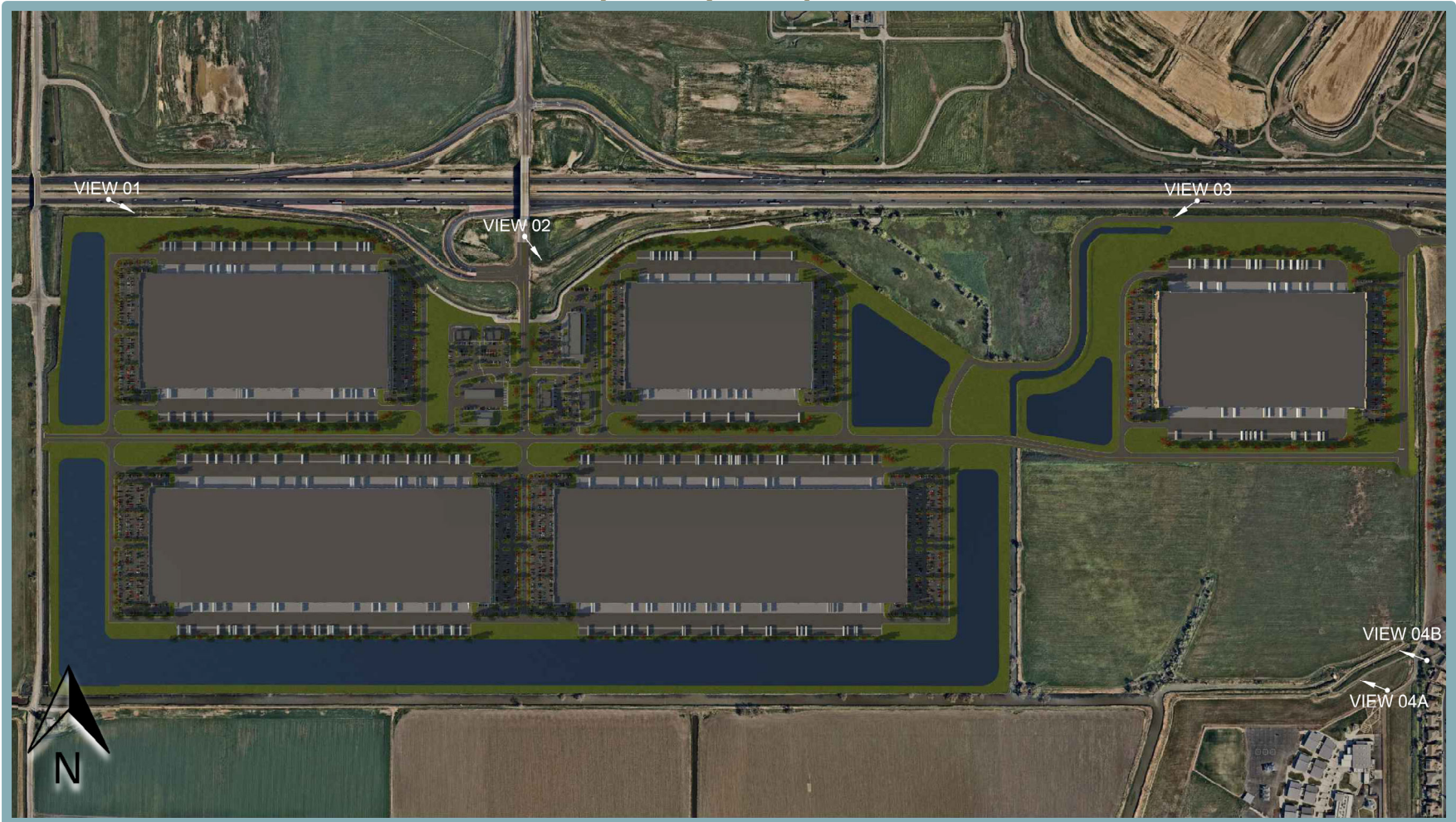


Figure 4.1-2
Existing View of Project Site from I-5 Looking Southeast (Key Viewpoint #1)



Figure 4.1-3
Existing View of Project Site from Metro Air Parkway Looking Southeast (Key Viewpoint #2)



Figure 4.1-4
Existing View of Project Site from I-5 Looking Southwest
(Key Viewpoint #3)



Figure 4.1-5
Existing View of Project Site from Access Roadway Looking
Northwest (Key Viewpoint #4A) and
Existing View of Project Site from Westlake Subdivision Looking
West (Key Viewpoint #4B)



Key Viewpoint # 1

Key Viewpoint #1 represents the view of the project site looking southeast from the eastbound lane of I-5. Motorists experience views of low to moderate visual quality with the foreground dominated by human-made elements, such as gravel, pavement, fencing, and utility poles with overhead lines. Midground views are dominated by a paved roadway and an open vista of disced vegetation, and background views consist of distant trees and vegetation, structures outlines, and open sky. The overall visual quality of this view is low to moderate quality.

Key Viewpoint # 2

Key Viewpoint #2 represents the view of the project site from Metro Air Parkway, looking southeast. Metro Air Parkway is an elevated road that crosses above I-5 and leads into the project site. This view is overall similar to Key Viewpoint #1, with foreground views consisting of pavement, road shoulder, guardrail barriers, and grassy vegetation. Midground views are dominated by a paved roadway and an open vista of disced vegetation, and background views consist of distant trees and vegetation, structures outlines, and open sky. The overall visual quality of this view is low to moderate quality.

Key Viewpoint # 3

Key Viewpoint #3 represents two views of the project site looking southwest from the eastbound lane of I-5. The foreground of these viewpoints are dominated by pavement, gravel, guardrail barriers, and grassy vegetation. Similar to Key Viewpoint #2, midground views consist of wire fencing, a paved roadway, and an open vista of disced vegetation. Background views consist of distant trees and vegetation, a couple structure outlines, distant hills, and open sky. The overall visual quality of these views is low to moderate quality.

Key Viewpoint # 4A

Key Viewpoint #4A represents the view of the project site looking northwest from Access Roadway. The foreground of this viewpoint consists of flooded grassy field. Midground views are dominated by a grassy berm as well as a utilities shed and three power line poles. Background views consist of distant trees, the outlines of hills, and open sky. The overall visual quality of this view is low quality.

Key Viewpoint # 4B

Key Viewpoint #4B represents the view of the project site looking west from the Westlake Subdivision and Egret Park. The foreground of this viewpoint consists of a paved walking path, sparsely vegetated dirt areas, a low chain fence and trees. Midground views are dominated by a grassy berm that blocks background views, which are limited to open sky. The overall visual quality of this view is low quality.

Light Pollution and Glare

Light pollution refers to unwanted light in the night sky, including glare, light trespass, sky glow, and over-lighting. Views of the night sky can be an important part of the natural environment, particularly in communities with extended viewsheds. Excessive light and glare can also be visually disruptive to humans and nocturnal animal species.

The project site is generally undeveloped and unlit, with the exception of two street lights on either side of Metro Air Parkway where the road enters the project site. The land south of the project site is rural and does not contain existing sources of light and glare. Existing sources of light and



glare consist of headlights from vehicles traveling on I-5 and light poles located along I-5; outdoor lighting on the Life Storage facility and the Westlake single-family residential subdivision located east of the project site; and outdoor lighting from the Metro Air Park and the Sacramento International Airport located north of the project site, across I-5.

4.1.3 REGULATORY CONTEXT

Applicable federal laws or regulations pertaining to the aesthetic quality of the project area do not exist. Existing State and local laws and regulations applicable to the proposed project are listed below.

State Regulations

The following are applicable State regulations related to aesthetic resources.

California Wild and Scenic Rivers Act

The California Wild and Scenic Rivers Act (PRC Section 5093.50 et seq.) was passed in 1972 to preserve designated rivers possessing extraordinary scenic, recreation, fishery, or wildlife values. The Lower American River, from Nimbus Dam to its junction with the Sacramento River, is designated as recreational under the California Wild and Scenic Rivers Act.

California Scenic Highway Program

The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been so designated. Such highways are identified in Section 263 et seq. of the California Streets and Highways Code.

Title 24 Outdoor Lighting Zones

The California Legislature passed a bill in 2001 requiring the California Energy Commission (CEC) to adopt energy efficiency standards for outdoor lighting for both the public and private sector. In November 2003, the CEC adopted changes to the Title 24, parts 1 and 6, Building Energy Efficiency Standards. These standards became effective on October 1, 2005, and included changes to the requirements for outdoor lighting for residential and nonresidential development. The new standards will likely improve the quality of outdoor lighting and help to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics such as, maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone. The classification is based on population figures of the 2000 Census. Areas can be designated as LZ1 (dark), LZ2 (rural), or LZ3 (urban). Lighting requirements for dark and rural areas are stricter in order to protect the areas from new sources of light pollution and light trespass. Sacramento County contains all three light zones. The developed portions of the County, including the City of Sacramento, are within LZ3 and the undeveloped portions, that include the proposed growth areas Jackson Highway Corridor and Grant Line East, are within LZ2. The LZ1 designation applies to government designated parks, recreation areas, and wildlife preserves.

Local Regulations

The following are the regulatory agencies and regulations pertinent to the proposed project at a local level.



Local Scenic Highways

The City of Sacramento does not contain designated federal or State Scenic Highways. However, State Route (SR) 160 is a designated Scenic Highway that extends north from the Contra Costa County line for 35 miles before terminating at the southern City limit. State Scenic Highways are not located in the project vicinity.

City of Sacramento 2040 General Plan

The relevant goals and policies from the City's 2040 General Plan related to aesthetics are presented below:

Land Use and Placemaking Element

Goal LUP-4 Walkable, transit-oriented centers and corridors that concentrate new jobs, housing, and entertainment opportunities to support frequent, reliable transit service and foster connected, accessible neighborhoods.

Policy LUP-4.6 **Compatibility with Adjoining Uses.** The City shall ensure that the introduction of higher-intensity mixed-use development along major arterial corridors is compatible with adjacent land uses, particularly residential uses, by requiring features such as the following:

- Buildings set back from rear or side yard property lines adjoining single-unit dwelling residential uses;
- Building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to minimize impacts to privacy and solar access;
- Landscaped off-street parking areas, loading areas, and service areas screened from adjacent residential areas to the degree feasible; or
- Lighting shielded from view and directed downward to minimize impacts on adjacent residential uses.

Policy LUP-4.7 **Visual and Physical Character.** Using development standards and design standards/guidelines, the City shall promote development patterns and streetscape improvements that transform the visual and physical character of automobile-oriented corridors to create a positive impact on the human and natural systems that interact with them.

Goal LUP-7 Industrial opportunities in suitable locations to provide employment for Sacramento residents and promote inclusive economic growth in the city.

Policy LUP-7.5 **Industrial Aesthetics.** The City shall encourage the development and maintenance of well-designed industrial and light industrial properties and structures that meet adopted standards for visual quality and design, especially where interfacing with other uses.

Goal LUP-8 A unique and varied sense of place, defined by distinctive natural and urban elements that contribute to local quality of life and hometown pride.



- Policy LUP-8.1 **Unique Sense of Place.** The City shall promote quality site, architectural, and landscape design that include the following:
- Connected walkable blocks;
 - Distinctive parks and accessible open spaces;
 - Tree-lined streets; and
 - Varied architectural styles.

4.1.4 IMPACTS AND MITIGATION MEASURES

The section below describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to aesthetics. A discussion of the project's impacts, as well as mitigation measures where necessary, are also presented.

Standards of Significance

The significance criteria used for this analysis were developed from Appendix G of the CEQA Guidelines, and applicable policies and regulations of the City of Sacramento. An aesthetic impact is considered significant if the proposed project would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point);
- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area; or
- Cause a significant environmental impact due to a conflict with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating impacts to aesthetics.

Method of Analysis

The following analysis utilizes a methodology based upon the FHWA publication *Visual Impact Assessment for Highway Projects* (1988) and supplemented by the FHWA *Guidelines for the Visual Impact Assessment of Highway Projects* (January 2015), combined with the State CEQA Guidelines' Appendix G Checklist questions for Aesthetics. Together, these provide the key analytical framework and guide the visual impact assessment process for the proposed project. Although the FHWA guidelines were initially created to provide an analytical framework for identifying and assessing qualitative changes to the visual environment that could be introduced as part of a transportation project, this methodology has become an industry standard for evaluating visual impacts associated with local and state non-transportation projects as well. Generally, the process includes the following basic steps:

- Defining the project setting and viewshed.
- Assessing existing visual resources and character of the project site and immediate vicinity.
- Identify viewer types.
- Assess visual quality of the proposed site.
- Identify key viewpoints and assess visual character and quality of viewpoints.
- Assess the visual impacts of the proposed project as seen from these viewpoints.



- Proposing methods to mitigate adverse visual impacts, if necessary.

As part of the analysis, an evaluative framework that defines the visual setting in terms of key views is utilized. A key view is a point from which a select view is analyzed from the perspective of potential viewer groups.

The following analysis assesses the anticipated changes in visual character (e.g., descriptive, non-evaluative characteristics such as land use, topography, scale, form, and color) and visual quality, evaluating them with respect to anticipated viewer response.

In February 2023, computer-generated simulations were prepared to aid in the visual character evaluation of the proposed project.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts related to aesthetic resources is based on implementation of the proposed project in comparison to existing conditions and the standards of significance presented above.

4.1-1 Have a substantial adverse effect on a scenic vista. Based on the analysis below, the impact would be *less than significant*.

Although the industrial park and nonparticipating parcels components of the proposed project would be developed at different times, because both would occur within the same project site, the following analysis applies to both components of the proposed project. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

A scenic vista, as defined in this EIR, is an area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. A scenic vista includes any such areas designated by a federal, State, or local agency. As discussed in the Existing Environmental Setting section of this chapter, the Sacramento and American river corridors, as well as the Capitol building, Tower Bridge, and Sutter's Fort, consist of the primary scenic resources of the City. However, the City's MEIR does not identify any scenic vistas within the City, and the County's General Plan EIR does not identify any scenic vistas in the project vicinity.

The project site is generally surrounded by agricultural uses to the south, west, and north, with the Life Storage facility and the Paso Verde K-8 School located to the east. In addition, the Sacramento International Airport, Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision are located to the north, across I-5 and past intervening agricultural land. As such, the scenic resources identified in the MEIR are not located in the project vicinity. Therefore, buildout of both the industrial park, nonparticipating parcels, and off-site improvement components of the proposed project would not obstruct public views of any such resources.



Based on the above, neither component of the proposed project would have a substantial adverse effect on a designated scenic vista, and a ***less-than-significant*** impact would occur.

Mitigation Measure(s)

None required.

4.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. Based on the analysis below, the impact would be *less-than-significant*.

Although the industrial park and nonparticipating parcels components of the proposed project would be developed at different times, because both would occur within the same project site, the following analysis applies to both components of the proposed project. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

As stated in the City's MEIR, existing scenic resources within the City include the American River and Sacramento River, including associated parkways, the State Capitol, and important historic structures listed on the Sacramento Register of Historic and Cultural Resources, California and/or National Registers. Although State scenic highways do not exist within the City, SR 160 is designated as a scenic highway from the Contra Costa County line to the southern City limit, for a length of 35 miles. Known as the River Road, the highway runs through the Delta agricultural area and small towns along the Sacramento River. Additional scenic highways do not exist within Sacramento County.

The proposed project is not located within the vicinity of the American River, Sacramento River, or the State Capitol. In addition, the project site does not include historic buildings or rock outcroppings. As discussed in Chapter 4.4, Biological Resources, of this EIR, the project site contains trees that are protected under Chapter 12.56, Tree Planting, Maintenance, and Conservation, of the City Code. Because the proposed project would include the removal of on-site trees, compliance with the applicable provisions of Chapter 12.56 of the Sacramento City Code would be required. Given compliance with Mitigation Measures 4.4-13(a) through 4.4-13(c), which require implementation of such requirements for both components of the proposed project, adverse impacts related to the removal of on-site trees would not occur. Additionally, installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway right-of-way (ROW) or in other previously disturbed areas. As such, construction of the proposed off-site improvements would not adversely affect scenic resources.

Based on the above information, because officially designated State scenic highways are not located near the project site, the buildout of both the industrial park and nonparticipating parcels components of the proposed project would not substantially



damage scenic resources, including but limited to, trees, rock outcroppings, and historic buildings, within a State scenic highway. Therefore, the project would result in a **less-than-significant** impact.

Mitigation Measure(s)

None required.

4.1-3 In a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point). Based on the analysis below, the impact would be significant and unavoidable.

Given that the existing development in the immediate vicinity of the site is primarily rural in nature, the analysis within this chapter considers the project area to be non-urbanized. The following discussion includes both a project-level and program-level analysis of potential impacts related to visual character and quality of public views of the site and its surroundings.

Industrial Park and Off-Site Improvement Area

The industrial park component of the proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, located immediately south of Bayou Way. The industrial park would allow for construction of up to 5,204,500 square feet (sf) of industrial uses, as well as approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality, on approximately 13.4 acres of the overall site.

Each industrial building would include driveways and associated parking areas to accommodate vehicles and/or trailers, as well as stormwater retention/detention areas to capture stormwater runoff from the newly constructed impervious surfaces and to provide for existing stormwater storage. According to the proposed Planned Unit Development (PUD) Guidelines, the maximum building height for the proposed industrial buildings would be 70 feet. The proposed retail/highway commercial uses would be generally situated south of the intersection of I-5 and Metro Air Parkway, with the proposed industrial uses generally surrounding the retail/highway commercial uses. According to the proposed PUD Guidelines, the maximum building height for the hotel in the proposed Highway Commercial PUD (HC-PD) zone would be 80 feet. Other structures in the HC-PD zone (i.e., restaurants and a fueling station/carwash) would not exceed the maximum heights for the proposed industrial buildings and hotel. The PUD Guidelines would also allow for increased height, subject to FAA and City of Sacramento approval, through a concurrent process in the future.

The proposed project would involve planting new trees along the northern border of the project site. Such landscaping would help screen the project from public views.

As discussed above, public views of the project site are afforded from I-5, Metro Park Airway, and Access Roadway. Changes to each of the aforementioned public views



due to development of the industrial park are discussed separately in further detail below. Because installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway ROW or in other previously disturbed areas, views of the off-site force main alignment would not be substantially degraded by the proposed project.

Key Viewpoint #1

As shown in Figure 4.1-2, Key Viewpoint #1 represents the view of the project site looking southeast from the southbound lane of I-5. Motorists experience views of low to moderate visual quality with the foreground dominated by human-made elements, such as gravel, pavement, fencing, and utility poles with overhead lines. Midground views are dominated by a paved roadway and an open vista of disced vegetation, and background views consist of distant trees and vegetation, structures outlines, and open sky.

Figure 4.1-6 shows Key Viewpoint #1 one year and 20 years following industrial park buildout, respectively. As shown therein, views of the industrial park looking southeast from the southbound lane of I-5 would change from the existing agricultural vegetation to industrial buildings. While foreground views would remain the same as the existing conditions, midground views would be fundamentally altered by the presence of the proposed industrial park, and existing background views would be eliminated entirely.

It is noted that trees are proposed to be planted along the northern border of the project site. Although the proposed landscaping would partially obscure views of the industrial park from Key Viewpoint #1, the trees would not screen views until after 20 years of growth.

As such, upon initial buildout of the proposed project, development would not be screened from public views. However, the viewer type at Key Viewpoint #1 would be motorists traveling on I-5, which has a speed limit of 65 miles per hour (mph). Therefore, such views of the project site would be temporary.

Based on the above, the existing visual character and quality of public views of the project site from the southbound lane of I-5 would be considered to be substantially degraded by the industrial park component of the proposed project.

Key Viewpoint #2

As shown in Figure 4.1-3, Key Viewpoint #2 represents the view of the project site from Metro Air Parkway, looking southeast. Metro Air Parkway is an elevated road that crosses above I-5 and leads into the project site. This view is overall similar to Key Viewpoint #1, with foreground views consisting of pavement, road shoulder, guardrail barriers, and grassy vegetation.



**Figure 4.1-6
1-Year and 20-Year Views of Project Site from I-5 Looking Southeast (Key Viewpoint #1)**



Midground views are dominated by a paved roadway and an open vista of disced vegetation, and background views consist of distant trees and vegetation, structures outlines, and open sky. The overall visual quality of this view is low to moderate quality.

Figure 4.1-7 shows Key Viewpoint #2 one year and 20 years following industrial park buildout, respectively. The proposed hotel and other HC-PUD structures occur in the midground, followed by industrial warehouse buildings, which are located immediately south and west of the HC-PUD structures. Similar to Key Viewpoint #1, although the planned landscaping would help obscure the industrial park from public views, the trees planted would take 20 years of growth to fully cover the buildings. In addition, as shown in Figure 4.1-7, even following 20 years of growth, the trees would not obscure views as efficiently as they would from Key Viewpoint #1.

As a result, the existing visual character and quality of public views of the project site looking southeast from Metro Air Parkway would be considered to be substantially degraded by the industrial park component of the proposed project.

Key Viewpoint #3

As shown in Figure 4.1-4, Key Viewpoint #3 represents two views of the project site looking southwest from the southbound lane of I-5. The foreground of these viewpoints are dominated by pavement, gravel, guardrail barriers, and grassy vegetation. Similar to Key Viewpoint #2, midground views consist of wire fencing, a paved roadway, and an open vista of disced vegetation. Background views consist of distant trees and vegetation, a couple structure outlines, distant hills, and open sky. The overall visual quality of these views is low to moderate quality.

Figure 4.1-8 shows Key Viewpoint #3 one year and 20 years following project buildout, respectively. As discussed above, following buildout of the proposed project, midground and background views of the project site would be fundamentally changed from agricultural land and open space to industrial buildings. The proposed HC-PUD structures would be largely screened by the industrial buildings. Although the proposed landscaping would help partially obscure views of the site, the trees would take 20 years to reach full growth; even then, the buildings would only be partially obscured. Similar to Key Viewpoint #1, discussed above, the viewer type at Key Viewpoint #3 would be motorists traveling on I-5, which has a speed limit of 65 mph. Therefore, such views of the project site would be temporary.

Based on the above, the existing visual character and quality of public views of the project site looking southwest from the southbound lane of I-5 would be considered to be substantially degraded by the proposed project.

Key Viewpoint #4A

As shown in Figure 4.1-5, Key Viewpoint #4A represents the view of the project site looking northwest from Access Roadway. The foreground of this viewpoint consists of flooded grassy field. Midground views are dominated by a grassy berm as well as a utilities shed and three power line poles. Background views consist of distant trees, the outlines of hills, and open sky. The overall visual quality of this view is low quality.



**Figure 4.1-7
1-Year and 20-Year Views of Project Site from Metro Air Parkway Looking Southeast (Key
Viewpoint #2)**



**Figure 4.1-8
1-Year and 20-Year Views of Project Site from I-5 Looking Southwest
(Key Viewpoint #3)**



Although the existing visual quality of Key Viewpoint #4A is low quality, the industrial park component of the proposed project would not significantly alter the existing view, as shown in Figure 4.1-5. Figure 4.1-9 shows Key Viewpoint #4A one year and 20 years following industrial park buildout, respectively. As shown therein, buildout of the industrial park would result in minor changes to background views by adding in new trees and buildings. The majority of the proposed buildings would already be obscured by the existing grassy berm in the midground, and the landscaping would further hide the buildings. Furthermore, as discussed in Chapter 4.10, Noise, of this EIR, Mitigation Measure 4.10-2 would require construction of an eight-foot-tall sound wall along a portion of the eastern project boundary. The installation of a sound wall along the eastern boundaries of the project site would further shield public views of the project site from Key Viewpoint #4A and would be visually consistent with the type of boundary shielding associated with industrial uses.

Based on the above, the low quality of this view would not be substantially degraded by the industrial park component of the proposed project.

Nonparticipating Parcels

The nonparticipating parcels portion of the project site consists of approximately 83 acres, and future buildout of such would include approximately 1,404,800 sf of industrial uses. Although specific designs have not yet been prepared for the nonparticipating parcels, due to the position of future development in the southeastern corner of the project site, views of the project site following buildout of the nonparticipating parcels are unlikely to change from what is shown in Figure 4.1-6 through Figure 4.1-8, above. Development within the nonparticipating parcels would either not be visible from the key viewpoints, or would be obscured by the development of the industrial park. In addition, the proposed PUD Guidelines include landscape/screening criteria, such as landscaping species requirements and minimum landscape buffer width standards, which would serve to screen public views towards the project site, thus, limiting the visual intrusion of the proposed structures.

However, Key Viewpoint #4A would be significantly altered beyond what is portrayed in Figure 4.1-9. While the industrial park component of the proposed project would be situated in the background of Key Viewpoint #4A, development of the nonparticipating parcels would convert midground views from the existing grassy berm into industrial buildings. As such, the existing visual character and quality of public views of the project site looking northwest from Access Roadway would be considered to be substantially degraded by the nonparticipating parcels component of the proposed project.

Conclusion

Based on the above, although the inclusion of landscaping trees would partially obscure views of the industrial park portion of the project site, the existing visual character and quality of public views of the site would be substantially degraded by development of both components of the proposed project. Thus, a **significant** impact could occur.



**Figure 4.1-9
1-Year and 20-Year Views of Project Site from Access Roadway Looking Northwest
(Key Viewpoint #4A)**



Mitigation Measure(s)

Although the proposed project would be required to comply with PUD Guidelines which would help to reduce the severity of the aesthetic impact of the proposed project, feasible mitigation does not exist to reduce the above impact to a less-than-significant level. Due to the substantial degradation of the existing visual character and quality of public views of the project site, the impact associated with construction of both components of the proposed project would remain *significant and unavoidable*.

4.1-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The impact would be *less than significant*.

Existing sources of light in the project area include vehicles traveling on I-5 as well as the residences and Life Storage facility east of the project site. As such, although the project site is currently undeveloped, and, thus, does not generate light and glare, sources of light currently exist in the project vicinity. Because the footprints of the proposed industrial park and nonparticipating parcels are contiguous, the potential for impacts related to new sources of substantial light or glare that could occur from developing either project component would be similar. Thus, the following discussion includes both a project-level and program-level analysis of potential impacts that could occur as a result of developing the proposed industrial park and nonparticipating parcels. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Development of both components of the proposed project would introduce additional sources of light and glare to the project area that would be similar to those emanating from the project vicinity. Sources of light from the proposed project would include headlights from vehicles traveling to and from the site, as well as street lighting. In addition, industrial and commercial uses would introduce new sources of lighting, such as architectural accent lighting, motion-activated security lighting, parking lot lighting, landscape lighting, and interior lighting visible through windows.

The proposed project would be subject to applicable 2040 General Plan policies, which would reduce impacts related to lighting and glare. For example, Policy LUP-4.6 Compatibility with Adjoining Uses would ensure that development of the industrial and commercial uses at the project site would be compatible with (and sensitive to) adjacent residential land uses by requiring all lighting to be shielded from view and directed downward to minimize impacts on adjacent residential uses.

Additionally, the proposed PUD Guidelines include sign standards for signs within the Industrial PUD (M-1-PUD) and HC-PUD zones. For instance, new identification signs installed as part of the proposed project would be a maximum height of 70 feet and would be limited to two signs along I-5. Ground-mounted signs and attached signs would be subject to the requirements set forth in Sacramento City Code Chapter 15.148. The PUD Guidelines also establish that light levels from the proposed structures and signs must be zero foot-candles at the property lines of the project site,



with LED fixtures facing downward. Furthermore, Section 17.608.040 of the Sacramento City Code would require that exterior lighting for project parking areas be shielded or otherwise designed to avoid spillover lighting on adjacent roadways and land areas. Compliance with such requirements would ensure that new sources of glare associated with the proposed project would not adversely impact airplanes that pass overhead.

With regard to glare associated with the solar panels proposed to be placed on rooftops of the industrial and commercial buildings, when sunlight strikes the glass front of a solar panel at a glancing angle, a portion of the solar radiation is reflected, which can potentially lead to solar glint or glare impacting a person's vision, including pilots landing aircraft. However, solar panels are designed to absorb, and thus not reflect, close to 100 percent of the solar energy that strikes them, as any reflected light cannot be converted into electricity. In addition, solar panels are typically constructed of dark-colored (usually blue or black) materials and are covered with anti-reflective coatings. Therefore, due to the low reflectivity of the proposed solar panels, as well as the height that the solar panels would be constructed, the panels would not be expected to cause visual impairment for motorists on area roadways because local motorists would pass under the panels' angle of reflection.

Regarding potential glare effects on the Sacramento International Airport, located one mile northwest of the project site, as discussed above, solar panels are designed to absorb, and thus not reflect, close to 100 percent of the solar energy that strikes them, and are typically covered with anti-reflective coatings. The reflection off a solar photovoltaic (PV) panel from most near normal angles is less than three percent, and has a reflectivity similar to water. In addition, the proposed solar panels would be angled east-west to track the sun, whereas planes taking off and landing at the Sacramento International Airport runways ascend and descend from the north and south. As a result, reflectivity from PV solar panels does not represent a risk to air traffic.⁹ Therefore, the proposed project would not be expected to cause visual impairment for aircraft pilots ascending or descending from the Sacramento International Airport.

Finally, the proposed off-site force main, including each of the three potential force main segment options, would be installed underground in existing roadway ROW or in other previously disturbed areas. As such, construction of the proposed off-site improvements would not create new sources of light and glare.

Based on the above, the project could introduce additional sources of light and glare from the proposed industrial and commercial uses. Compliance with aforementioned policies and requirements would reduce impacts related to light illumination on the project site. Thus, anticipated lighting from the proposed project would not adversely affect day or nighttime views in the area, and would result in a **less-than-significant** impact.

Mitigation Measure(s)

None required.

⁹ Anurag et al. *General Design Procedures for Airport-Based Solar Photovoltaic Systems* [pg. 10] August 12, 2017.



Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

Some types of impacts to aesthetic resources are localized and not cumulative in nature. For example, the creation of glare or shadows at one location is not worsened by glare or shadows created at another location. Rather these effects are independent, and the determination as to whether they are adverse is specific to the project and location where they are created. Projects that block a view or affect the visual quality of a site also have localized aesthetic impacts. The impact occurs specific to a site or area and remains independent from another project elsewhere that may block a view or degrade the visual environment of a specific site.

Two types of aesthetic impacts may be additive in nature and thus cumulative, including night sky lighting and overall changes in the visual environment as the result of increasing urbanization of large areas. As development in one area increases and possibly expands over time and meets or connects with development in an adjoining exurban area, the effect of night sky lighting experienced outside of the region may increase in the form of larger and/or more intense nighttime glow in the viewshed.

Similarly, as development in one area changes from rural to urban, and this pattern continues to occur throughout the undeveloped areas of a jurisdiction, the changes in visual character may become additive and cumulatively considerable. The proposed project’s incremental contribution to night sky lighting and changes in visual character are addressed below.

The following discussion of impacts is based on the implementation of the proposed project, including the nonparticipating parcels, in combination with other proposed and pending projects in the region. Other proposed and pending projects in the region under the cumulative context would generally include buildout of the City of Sacramento 2040 General Plan policy area, as well as the sites of the Northlake (Greenbriar) subdivision, the Metro Air Park Project, and the Elkhorn Boulevard Extension Project. For more details regarding the cumulative setting, refer to Chapter 6, Statutorily Required Sections, of this EIR.

4.1-5 Long-term changes in visual character associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan and the Sacramento County General Plan. Based on the analysis below, the project’s incremental contribution to the significant cumulative impact is *significant and unavoidable*.

As discussed previously, the visual resources of the immediate project vicinity are mostly characterized by agricultural lands to the south, west, and north, across I-5. The Paso Verde K-8 School is located south of the easternmost corner of the project



site, and the Life Storage facility, Egret Park, and the Westlake single-family residential subdivision are located immediately east of the project site. The Sacramento International Airport, Metro Air Park, and the Amazon SMF-1 Fulfillment Center are located to the north, across I-5 and past intervening agricultural land.

In addition to the existing development in the project vicinity, the Northlake (Greenbriar) subdivision is currently under construction northeast of the project site. Furthermore, the parcels located immediately north of the project site are planned for industrial development associated with the Metro Air Park, and the parcels northwest and west of the project site are planned for development associated with the Sacramento International Airport.

As discussed under Impact 4.1-3, development of the proposed industrial park and future development of the nonparticipating parcels would substantially degrade the visual character and the quality of public views of the project site. In context with the planned development along the I-5 corridor in the project vicinity, the proposed project would contribute towards significantly altering the visual character of the surroundings. Therefore, the proposed project's incremental contribution to such impacts would be **significant**.

Mitigation Measure(s)

Feasible mitigation does not exist to reduce the above impact to a less-than-significant level. Due to the substantial degradation of the existing visual character and quality of public views of the project site, the impact associated with construction of both components of the proposed project in combination with cumulative development would remain *significant and unavoidable*.

4.1-6 Creation of new sources of light or glare associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan. Based on the analysis below, the project's incremental contribution to the significant cumulative impact is less than cumulatively considerable.

Cumulative effects of lighting are visible over a wide area, due to the potential for lighting from a number of projects to create sky glow. Cumulative development throughout the City of Sacramento 2040 General Plan and Sacramento County General Plan planning areas, particularly conversion of rural or currently vacant sites to urban uses, would increase the sources of light and glare, which would have the potential to contribute to sky glow in the area and result in a significant cumulative impact. Such sources of light would be typical of existing industrial development in the greater project vicinity, such as the Sacramento International Airport and Amazon SMF-1 Fulfillment Center to the north of the project site.

Following approval of the SOI Amendment and Annexation of the project site into the City of Sacramento's City limits, development on-site would be subject to applicable City regulations. Cumulative development within the City of Sacramento 2040 General



Plan planning area, including the proposed project, would be subject to existing regulations and guidelines related to light and glare. For example, Policy LUP-4.6 Compatibility with Adjoining Uses would require all lighting at the project site to be shielded from view and directed downward to minimize impacts on adjacent residential uses. In addition, Section 17.608.040 of the City Code would require that exterior lighting for project parking areas be shielded or otherwise designed to avoid spillover lighting on adjacent roadways and land areas.

The MEIR determined that because the City of Sacramento is mostly built-out with a level of ambient light that is typical of and consistent with the urban character of a large city and new development allowed under the 2040 General Plan would be subject to the 2040 General Plan policies, building codes, and (for larger projects) design review, the introduction of substantially greater intensity or dispersal of light would not occur.

In addition, although the project site is not currently within the City of Sacramento's SOI, the proposed development, as well as other development within the project's cumulative setting, are located at the westernmost boundary of the City. As such, the light and glare generated by future and existing industrial development in the project vicinity would be consistent with what currently exists as travelers enter the City from the west.

Based upon the above analysis, cumulative development within the City of Sacramento would be subject to all applicable requirements of City of Sacramento 2040 General Plan Policy LUP-4.6 and Section 17.608.040 of the City Code. Furthermore, cumulative development within Sacramento County in the project vicinity, such as expansion of the Sacramento International Airport, would be subject to compliance with applicable policies of the County's General Plan, such as Policy LU-33, which is intended to reduce light pollution. Compliance with such would ensure that buildout of the proposed project, in combination with cumulative development of the City's 2040 General Plan and the County's General Plan, would not result in a significant cumulative impact related to light and glare and the impact would be **less than cumulatively considerable**.

Mitigation Measure(s)

None required.



4.2 AGRICULTURAL RESOURCES

4.2 AGRICULTURAL RESOURCES

4.2.1 INTRODUCTION

This Agricultural Resources chapter of the EIR summarizes the existing agricultural resources within the boundaries of the Airport South Industrial Project site using the current State Department of Conservation model and data, including identification of any Prime/Unique Farmland or Farmland of Statewide Importance within the project boundaries. As discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

The following analysis addresses the conversion of lands to urban uses, as well as any conflicts with existing zoning for agricultural use or right-to-farm ordinances. Furthermore, this chapter outlines the policies and standards set by the Sacramento Local Agency Formation Commission (LAFCo) regarding agricultural resources, and analyzes the proposed project's consistency with those policies. Documents referenced to prepare this chapter include the City of Sacramento 2040 General Plan,¹ the City of Sacramento 2040 Master EIR (MEIR),² the Sacramento LAFCo *Policy, Standards and Procedures Manual*,³ the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey,⁴ Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Sacramento County,⁵ the California Department of Conservation (DOC) Important Farmland Finder,⁶ the Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Sacramento County,⁷ and the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.⁸

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

² City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.

³ Sacramento Local Agency Formation Commission. *Policy, Standards and Procedures Manual*. September 2007.

⁴ United States Department of Agriculture. National Resources Conservation Service. Web Soil Survey. Accessed January 2022.

⁵ California Department of Conservation, Farmland Mapping and Monitoring Program: Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Sacramento County, 2010.

⁶ California Department of Conservation. *Farmland Mapping & Monitoring Program*. Available at: <https://www.conservation.ca.gov/dlrp/fmmp>. Accessed January 2022.

⁷ California Department of Conservation, Farmland Mapping and Monitoring Program. *Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance*, Sacramento County. Updated November 2020.

⁸ California Legislative Information. *Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 [56000-57550]*. Available at: leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=56064. Accessed January 2022.



4.2.2 EXISTING ENVIRONMENTAL SETTING

The Existing Environmental Setting section describes current farmland and soil productivity classification systems, as well as the extent and quality of the agricultural resources present on the project site.

Farmland Classifications

The NRCS uses two systems to determine a soil’s agricultural productivity: 1) the Soil Capability Classification; and 2) the Storie Index Rating System. The “prime” soil classification of both systems indicates the presence of few to no soil limitations, which if present, would require the application of management techniques (e.g., drainage, leveling, special fertilizing practices) to enhance production. The Farmland Mapping and Monitoring Program (FMMP), part of the Division of Land Resource Protection, California DOC, uses the information from the NRCS to create maps illustrating the types of farmland in the area.

Another farmland classification system employed in the analysis of this chapter is based upon the Sacramento LAFCo definition of “agricultural land” and “prime agricultural land,” as defined below.

Soil Capability Classification

The Soil Capability Classification System takes into consideration soil limitations, the risk of damage when soils are used, and the way in which soils respond to treatment. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils, which are unsuitable for agriculture. Generally, as the rating of the capability classification system increases, the yields and profits are difficult to obtain. A general description of soil classification, as defined by the NRCS, is provided in Table 4.2-1.

| Class | Definition |
|-------|--|
| I | Soils have few limitations that restrict their use. |
| II | Soils have moderate limitations that reduce the choice of plants, or that require special conservation practices. |
| III | Soils have severe limitations that reduce the choice of plants, require conservation practices, or both. |
| IV | Soils have very severe limitations that reduce the choice of plants, require very careful management, or both. |
| V | Soils are not likely to erode but have other limitations; impractical to remove and limit their use largely to pasture or range, woodland, or wildlife habitat. |
| VI | Soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture or range, woodland, or wildlife habitat. |
| VII | Soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat. |
| VIII | Soils and landforms have limitations that preclude their use for commercial plants and restrict their use to recreation, wildlife habitat, or water supply or to aesthetic purposes. |

Source: USDA Soil Conservation Service, Soil Survey of Sacramento County, 1993.

Storie Index Rating System

The Storie Index Rating system ranks soil characteristics according to their suitability for agriculture from Grade 1 soils (80 to 100 rating), which do not have limitations or have few



limitations for agricultural production, to Grade 6 soils (less than 10), which are not suitable for agriculture. Under this system, soils deemed less than prime could function as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed. The six grades, ranges in index rating, and definition of the grades, as defined by the NRCS, are provided in Table 4.2-2, Storie Index Rating System.

| Grade | Index Rating | Definition |
|---|----------------|---|
| 1 – Excellent | 80 through 100 | Soils are well suited to intensive use for growing irrigated crops that are climatically suited to the region. |
| 2 – Good | 60 through 79 | Soils are good agricultural soils, although they may not be so desirable as Grade 1 because of moderately coarse, coarse, or gravelly surface soil texture; somewhat less permeable subsoil; lower plant available water holding capacity, fair fertility; less well drained conditions, or slight to moderate flood hazards, all acting separately or in combination. |
| 3 – Fair | 40 through 59 | Soils are only fairly well suited to general agriculture use and are limited in their use because of moderate slopes; moderate soils depths; less permeable subsoil; fine, moderately fine or gravelly surface soil textures; poor drainage; moderate flood hazards; or fair to poor fertility levels, all acting alone or in combination. |
| 4 – Poor | 20 through 39 | Soils are poorly suited. They are severely limited in their agricultural potential because of shallow soil depths; less permeable subsoil; steeper slope; or more clayey or gravelly surface soil texture than Grade 3 soils, as well as poor drainage; greater flood hazards; hummocky micro-relief; salinity; or poor fertility levels, all acting alone or in combination. |
| 5 – Very Poor | 10 through 19 | Soils are very poorly suited for agriculture, are seldom cultivated and are more commonly used for range, pasture, or woodland. |
| 6 – Non-agriculture | Less and 10 | Soils are not suited for agriculture at all due to very severe to extreme physical limitations, or because of urbanization. |
| Source: USDA Soil Conservation Service, Soil Survey of San Joaquin County, 1992. | | |

Farmland Mapping and Monitoring Program

The California DOC has a Division called the Land Resource Protection Division. The DOC established the FMMP in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the USDA Soil Conservation Service (USDA-SCS). The intent of the USDA-SCS was to produce agriculture maps based on soil quality and land use across the nation. As part of the nationwide agricultural land use mapping effort, the USDA-SCS developed a series of definitions known as Land Inventory and Monitoring (LIM) criteria. The LIM criteria classified the land's suitability for agricultural production; suitability included both the physical and chemical characteristics of soils and the actual land use. Important Farmland Maps are derived from the USDA-SCS soil survey maps using the LIM criteria.

Since 1980, the State of California has assisted the USDA-SCS with completing mapping in the State. The FMMP was created within the California DOC to carry on the mapping activity on a continuing basis, and with a greater level of detail. The DOC applied a greater level of detail by modifying the LIM criteria for use in California. The LIM criteria in California utilizes the SCS and



Storie Index Rating systems, but also considers physical conditions such as dependable water supply for agricultural production, soil temperature range, depth of the groundwater table, flooding potential, rock fragment content and rooting depth.

Important Farmland Maps for California are compiled using the modified LIM criteria (as described above) and current land use information. Important Farmland Maps for California are updated every two years; it is noted that the City of Sacramento has submitted a request with the California DOC and Sacramento County to update the Important Farmland Maps before the scheduled time in order to correct inaccuracies in the current Maps.⁹ The minimum mapping unit is 10 acres unless otherwise specified. Units of land smaller than 10 acres are incorporated into surrounding classifications. The Important Farmland Maps identify seven agriculture-related categories: prime farmland, farmland of statewide importance (statewide farmland), unique farmland, farmland of local importance (local farmland), grazing land, urban and built-up land (urban land), and other land. Each is summarized below, based on a Guide to Farmland Mapping and Monitoring Program (2004), prepared by the California DOC.

Prime Farmland: Prime farmland is land with the best combination of physical and chemical features able to sustain the long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Statewide Farmland: Farmland of Statewide Importance is land similar to prime farmland, but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Unique Farmland: Unique farmland is land of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. The land must have been cropped at some time during the four years prior to the mapping date.

Local Farmland: Farmland of Local Importance is land of importance to the local agricultural economy, as determined by each county's Board of Supervisors and a local advisory committee. Sacramento County local farmland includes lands which do not qualify as Prime, Statewide, or Unique designation, but are currently irrigated crops or pasture or non-irrigated crops; lands that would meet the Prime or Statewide designation and have been improved for irrigation, but are now idle; and lands that currently support confined livestock, poultry operations and aquaculture.

Grazing Land: Grazing land is land on which the existing vegetation, whether grown naturally or through management, is suited to the grazing

⁹ City of Sacramento Community Development Department. *Sacramento County Farmland Designation Discrepancies – Request for Amendment*. October 31, 2023.



of livestock. The minimum mapping unit for this category is 40 acres.

Urban Land:

Urban and built-up land is occupied with structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Uses may include residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land:

Other land is land that is not included in any other mapping categories. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Sacramento LAFCo

Sacramento LAFCo is a State-mandated boundary agency responsible for coordinating logical and timely changes in local government boundaries. As set forth in Section 56001 of the California Government Code, LAFCos are established by the State to ensure the logical formation and determination of local agency boundaries to promote orderly development and balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services.

The definition of agricultural lands used by all LAFCos is established by Section 56064 of the Government Code. Section 56064 defines “agricultural lands” for LAFCO purposes as land currently used for the purpose of producing an agricultural commodity for commercial purposes, land left fallow under a crop rotational program, or land enrolled in an agricultural subsidy or set-aside program. Under the Government Code definition, “prime agricultural land” means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as Class I or Class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible;
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating;
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the USDA in the National Range and Pasture Handbook, Revision 1, December 2003;
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre;
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.



Existing Farmland

According to the City of Sacramento 2040 General Plan MEIR, the Sacramento policy area, which does not include the project site, contains 41 acres of Prime Farmland, nine acres of Farmland of Statewide Importance, and 3,802 acres of Farmland of Local Importance, as of 2020. The City of Sacramento policy area does not contain Unique Farmland. According to the County’s General Plan EIR, Sacramento County, which includes the project site, contains approximately 110,278 acres of Prime Farmland, 56,140 acres of Farmland of Statewide Importance, 15,187 acres of Unique Farmland, and 39,873 acres of Farmland of Local Importance.

Project Site Characteristics

The following sections provide an overview of the local existing soils and agricultural activity, as well as Williamson Act contracts and important farmland designations associated with the project site.

Soil Classifications

According to the USDA NRCS Web Soil Survey, the project site consists of the following soils, as shown in Figure 4.2-1:

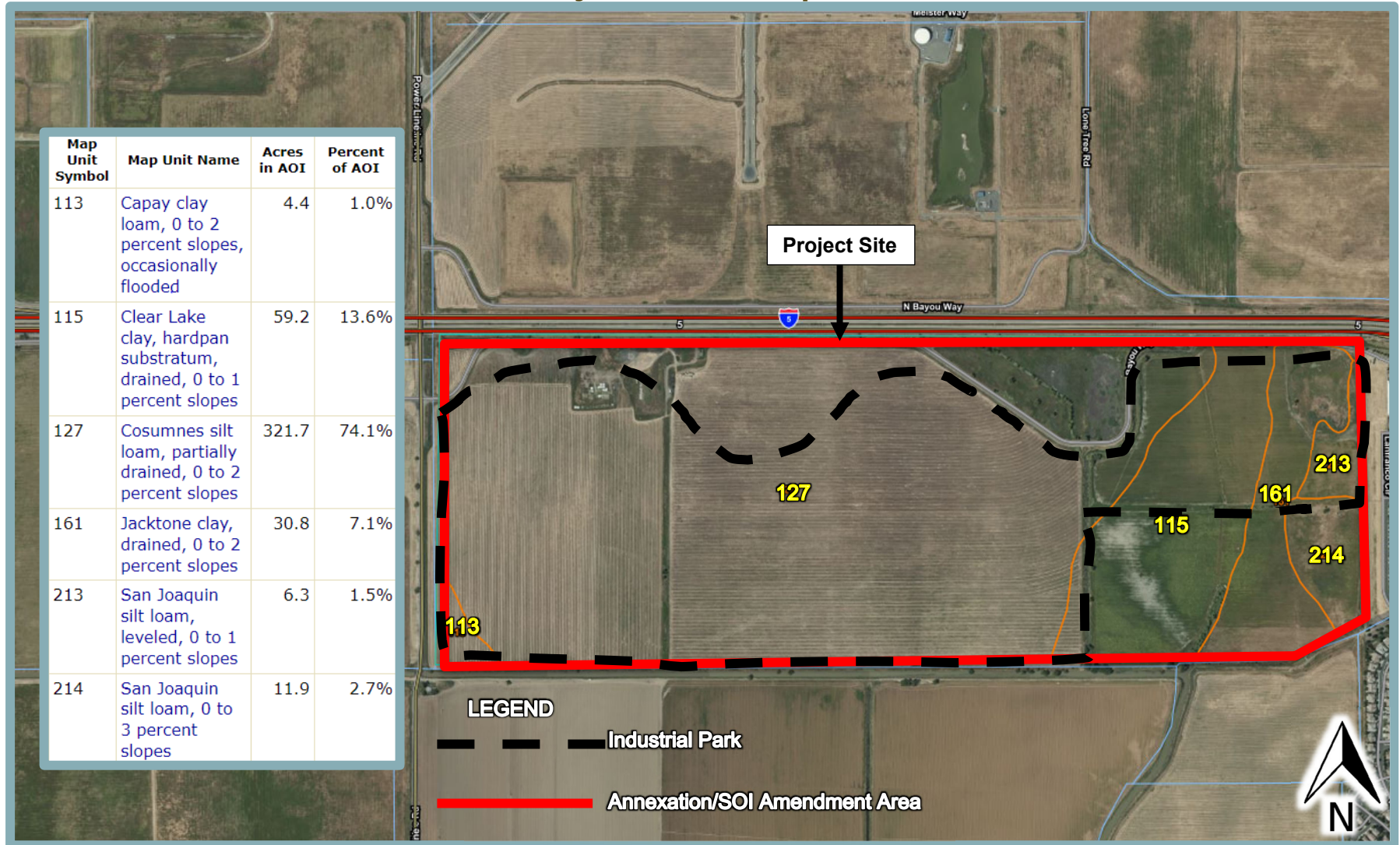
- Capay clay loam, zero to two percent slopes, occasionally flooded (map symbol 113);
- Clear Lake clay, hardpan substratum, drained, zero to one percent slopes (115);
- Cosumnes silt loam, partially drained, zero to two percent slopes (127);
- Jacktone clay, drained, zero to two percent slopes (161);
- San Joaquin silt loam, leveled, zero to one percent slopes (213); and
- San Joaquin silt loam, zero to three percent slopes (214).

The soils are described below and shown in Table 4.2-3. As shown in Table 4.2-3, four of the on-site soils are Grade 4, indicating that the soils are severely limited in their agricultural potential because of shallow soil depths; less permeable soil; steeper slope; or more clayey or gravelly surface soil texture than Grade 3 soils, as well as poor drainage; greater flood hazards; hummocky micro-relief; salinity; or poor fertility levels all acting alone or in combination.

| Soil Map Symbol and Name | Soil Capability Classification | Storie Index Grade |
|--|--------------------------------------|--------------------|
| Capay clay loam (113) | IIIw, non-irrigated, IIw, irrigated | 2 |
| Clear Lake clay (115) | IIIs, non-irrigated, IIs, irrigated | 5 |
| Cosumnes silt loam (127) | IIlw, non-irrigated, IIw, irrigated | 4 |
| Jacktone clay (161) | IIIs, non-irrigated, IIIs, irrigated | 6 |
| San Joaquin silt loam, leveled (213) | IIIs, non-irrigated, IIIs, irrigated | 4 |
| San Joaquin silt loam (214) | IIIs, non-irrigated, IIIs, irrigated | 4 |
| Note: Capability subclasses are soil groups within one class. They are designated by adding a small letter, e, w, s, or c, to the class numeral, for example, IIe. The letter e shows that the main hazard is the risk of erosion unless close-growing plant cover is maintained; w shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage); s shows that the soil is limited mainly because it is shallow, droughty, or stony; and c, used in only some parts of the United States, shows that the chief limitation is climate that is very cold or very dry. | | |
| Source: USDA NRCS, Web Soil Survey, 2023. | | |



**Figure 4.2-1
 Project Site Soil Map**



Soil Descriptions

Capay clay loam, zero to two percent slopes, occasionally flooded (113) is located on the rims of basins. Permeability of the loam is slow. Surface runoff is slow or very slow, and the erosion hazard is slight. The available water capacity is very high. The effective rooting depth is 60 inches or more. The soil is used mainly for irrigated pasture and hay or for dryland crops, such as wheat. Some areas are used for irrigated crops, including corn, wheat, rice, tomatoes. The land capability unit is Illw non-irrigated and Ilw irrigated, with a Storie Index Grade of 2.

Clear Lake clay, hardpan substratum, drained, zero to one percent slopes (115) is located in basins. Permeability of the clay is slow. Surface runoff is very slow, and the erosion hazard is none to slight. The available water capacity is moderate. The effective rooting depth is 40 to 80 inches. The soil is used mainly for irrigated crops, such as rice, corn, tomatoes, sugar beets, and wheat. The land capability unit is Ills non-irrigated and IIs irrigated, with a Storie Index Grade of 5.

Cosumnes silt loam, partially drained, zero to two percent slopes (127) is located on low flood plains. Permeability of the loam is slow. Surface runoff is slow, and the erosion hazard is slight. The available water capacity is high. The effective rooting depth is limited by a seasonal high water table in winter and early spring due to seepage. The water table is generally maintained below a depth of 36 inches by pumping, but can be at a depth of 20 to 36 inches for short periods. The soil is suited for rice crops. The land capability unit is Illw non-irrigated and Ilw irrigated, with a Storie Index Grade of 4.

Jacktone clay, drained, zero to two percent slopes (161) is located in high areas in basins. Permeability of the clay is slow. Surface runoff is very slow, and the erosion hazard is none to slight. The available water capacity is moderate. The effective rooting depth is 20 to 40 inches. The soil is used mainly for irrigated crops, such as rice, barley, wheat, and corn. The land capability unit is Ills both non-irrigated and irrigated, with a Storie Index Grade of 6.

San Joaquin silt loam, leveled, zero to one percent slopes (213) is located on low terraces. Permeability of this San Joaquin silt loam is very slow. Surface runoff is very slow, and the erosion hazard is none to slight. The available water capacity is low. The effective rooting depth is 23 to 40 inches. The soil is used principally for irrigated crops or for irrigated hay and pasture. Other uses include irrigated crops for rice. The land capability unit is Ills both non-irrigated and irrigated, with a Storie Index Grade of 4.

San Joaquin silt loam, zero to three percent slopes (214) is located on low terraces. Permeability of the soil is very slow. Surface runoff is slow, and the erosion hazard is slight. The available water capacity is low. The effective rooting depth is 23 to 40 inches. The soil is used principally for irrigated crops or for irrigated hay and pasture. Other uses include irrigated crops for rice. The land capability unit is Ills both non-irrigated and irrigated, with a Storie Index Grade of 4.

Important Farmland Designation

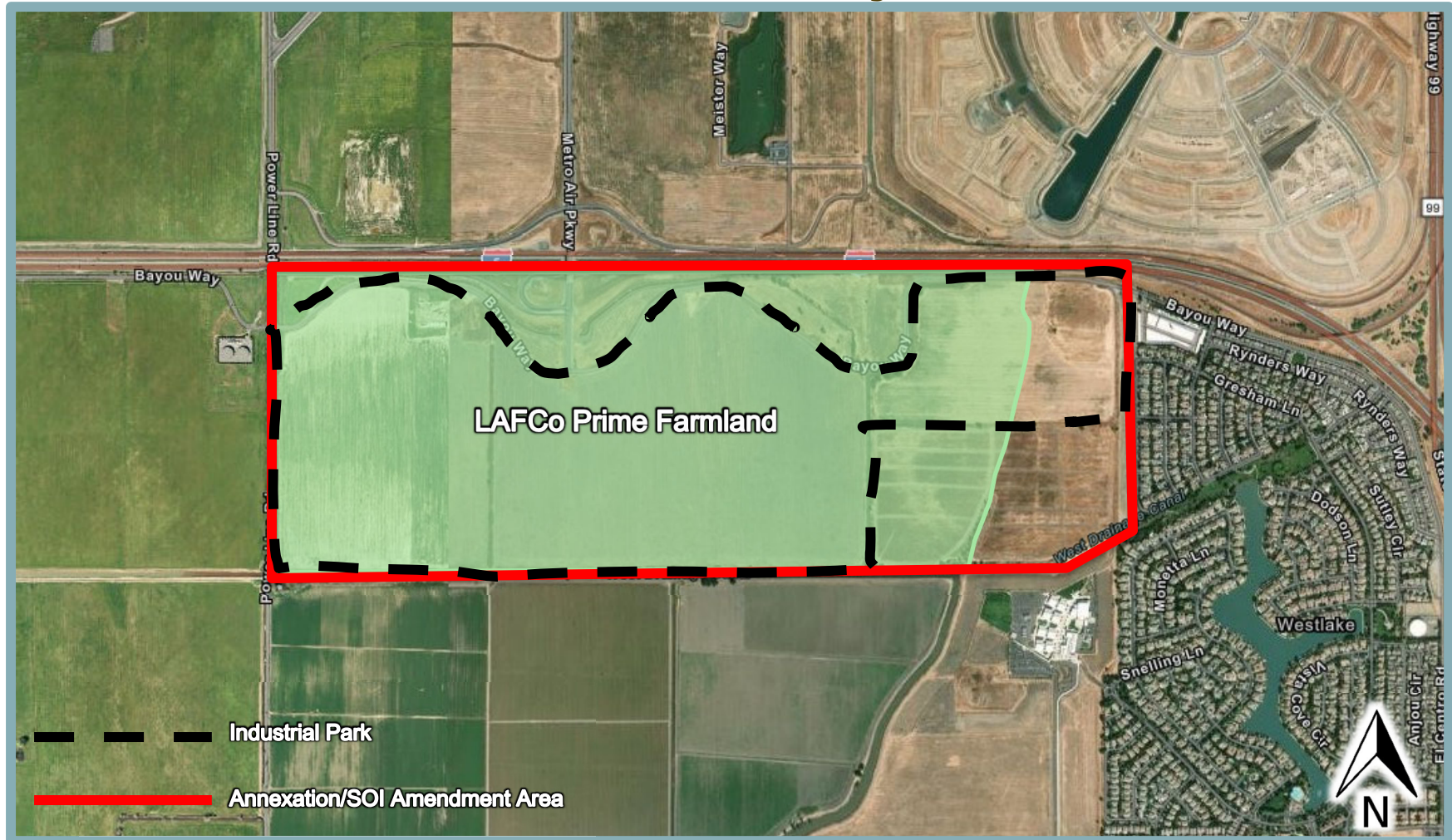
With the exception of State mandated LAFCo prime farmland definitions as set forth in Government Code Sections 51201 and 56064, farmland designations that do not meet the definition of Important Farmland pursuant to DOC and CEQA requirements, including Farmland of Local Importance and Other Land, are outside the scope of CEQA requirements, and, thus, are not discussed further. On-site California DOC farmland designations are shown in Figure 4.2-2 and on-site LAFCo Prime Farmland designations are shown in Figure 4.2-3.



**Figure 4.2-2
FMMP Designations**



**Figure 4.2-3
LAFCo Prime Farmland Designation**



As shown in Figure 4.2-2, the California DOC has defined areas of the project site as Important Farmland, including 31.3 acres of Prime Farmland and 12.1 acres of Farmland of Statewide Importance.¹⁰ In addition, pursuant to the Sacramento LAFCo definition of “prime agricultural land” and the on-site soil capability classifications above, the project site contains an approximate total of 385.3 acres of prime agricultural land, as shown in Figure 4.2-3.

The project site was historically used as hay fields, with intermittent rice fields from 1937 until at least 2020. The project site is not currently used for active agricultural purposes and is not irrigated. The project site is not subject to a Williamson Act contract.

Additionally, as shown in Figure 3-4 of the Project Description chapter of this EIR, the proposed off-site force main alignment, including each of the three potential force main segment options, occurs in existing roadway right-of-way (ROW) or in other previously disturbed areas. Thus, the off-site improvement area does not include Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

4.2.3 REGULATORY CONTEXT

The following is a description of federal, State, and local environmental laws and policies that are relevant to the review of agricultural resources under CEQA.

Federal Regulations

The proposed project would be required to comply with the federal regulation described below in order to be developed.

Farmland Protection Policy Act

The NRCS, a federal agency within the USDA, is the agency primarily responsible for the implementation of the Farmland Protection Policy Act (FPPA). The purpose of the FPPA is to minimize federal programs’ contribution to the conversion of farmland to nonagricultural uses by ensuring that federal programs are administered in a manner that is compatible with state, local and private programs designed to protect farmland. NRCS provides technical assistance to federal agencies, state, and local governments; tribes or non-profit organizations that desire to develop farmland protection programs and policies.

The FPPA also established the Farmland Protection Program (FPP) and the Land Evaluation and Site Assessment (LESA). The LESA system ranks lands for suitability and inclusion in the FPP. LESA evaluates several factors, including soil potential for agricultural uses, location, market access, and adjacent land uses. The LESA system has spawned many variations, including the California LESA model, which is used in California’s FMMP.

State Regulations

The proposed project would have to comply with the State regulations described below, where applicable, in order to be developed.

¹⁰ California Department of Conservation. *Farmland Mapping & Monitoring Program*. Available at: <https://www.conservation.ca.gov/dlrp/fmmp>. Accessed January 2022.



California Land Conservation Act – Williamson Act

The California Land Conservation Act, better known as the Williamson Act, has been the State's premier agricultural land protection program since the act's enactment in 1965. The California legislature passed the Williamson Act in 1965 to preserve agricultural and open space lands by discouraging premature and unnecessary conversion to urban uses. The Act creates an arrangement whereby private landowners' contract with counties and cities to voluntarily restrict land to agricultural and open-space uses. The vehicle for these agreements is a rolling term 10-year contract (i.e., unless either party files a "notice of nonrenewal," the contract is automatically renewed annually for an additional year). In return, restricted parcels are assessed for property tax purposes at a rate consistent with their annual use, rather than potential market value. The project site is not subject to a Williamson Act contract.

Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 - Prime Agricultural Definition

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Act) establishes procedures for local government changes of organization, including city incorporations, annexations to a city or special district, and city and special district consolidations. LAFCo's have numerous powers under the Act, but those of primary concern are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. According to Section 56064 of the Cortese-Knox-Hertzberg Act, prime agricultural land means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets five specific qualifications discussed further below. The project site is subject to Section 56064 of the Cortese-Knox-Hertzberg Act.

Local Regulations

The following are the local government environmental goals and policies relevant to the CEQA review process.

Sacramento LAFCo

Sacramento LAFCo is a State-mandated boundary commission responsible for coordinating logical and timely changes in local government boundaries. In consideration of proposals, the Commission observes four basic statutory purposes: the discouragement of urban sprawl, the preservation of open space and agricultural land resources, the efficient provision of government services, and the encouragement of orderly growth boundaries based upon local conditions and circumstances. LAFCo's powers, procedures, and functions are set forth in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, (Government Code Section 56000 et seq.). The following statewide LAFCo definitions, as established in Government Code Section 56064, will be used to determine the potential impacts pertaining to compliance with the requirements of the Government Code:

Agricultural lands

"Agricultural lands" means land currently used for the purpose of producing an agricultural commodity for commercial purposes, land left fallow under a crop rotational program, or land enrolled in an agricultural subsidy or set-aside program.



Prime agricultural lands

"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as Class I or Class II in the Soil Conservation Service land use capability classification, whether or not the land is actually irrigated, provided that irrigation is feasible;
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating;
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003;
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual bases from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre;
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

Sacramento LAFCo has adopted specific standards to ensure that fair and consistent decisions are rendered in accordance with State law. The following list of the adopted Sacramento LAFCo policies and standards is not exhaustive, and only lists goals and policies that pertain to the proposed project. The following are applicable policies from the Sacramento LAFCo Policy, Standards and Procedures Manual, Chapter IV, General Standards.

E. Agricultural Land Conservation

1. LAFCo will approve a change of organization or reorganization which will result in the conversion of prime agricultural land in open space use to other uses only if the Commission finds that the proposal will lead to the planned, orderly and efficient development of an area. For purposes of this standard, a proposal leads to the planned, orderly efficient development of an area only if all of the following criteria are met:
 - a. The land subject to the change of organization or reorganization is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.
 - b. The proposed development of the subject lands is consistent with the Spheres of Influence Plan, including the Master Services Element of the affected agency or agencies.
 - c. Development of all or a substantial portion of the subject land is likely to occur within five years. In the case of very large development, annexation should be



phased whenever feasible. If the commission finds phasing infeasible for the specific reasons, it may approve annexation if all or a substantial portion of the subject land is likely to develop within a reasonable period of time.

- d. An insufficient vacant non-prime land exists within the applicable Spheres of Influence that are planned, accessible, and developable for the same general type of use.
- e. The proposal will have no significant adverse effect on the physical and economic integrity of other agricultural lands. In making this determination, LAFCo will consider the following factors:
 - i. The agricultural significance of the subject and adjacent areas relative to other agricultural lands in the region.
 - ii. The use of the subject and the adjacent areas.
 - iii. Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of adjacent or nearby agricultural land, or will be extended through or adjacent to, any other agricultural lands which lie between the project site and existing facilities.
 - iv. Whether natural or man-made barriers serve to buffer adjacent or nearby agricultural land from the effects of the proposed development.
 - v. Applicable provisions of the General Plan open space and land use elements, applicable growth-management policies, or other statutory designed to protect agriculture.

City of Sacramento 2040 General Plan

The City of Sacramento 2040 General Plan identifies the following goals and policies related to agricultural resources:

Land Use and Placemaking Element

Goal LUP-1 A compact urban footprint and sustainable development pattern with infrastructure that supports efficient delivery of public services while protecting surrounding open space lands

Policy LUP-1.11 **Coordinate to Protect Farmland.** The City shall continue to work with Sacramento County and other adjacent jurisdictions to implement conservation plans, preserve farmland and protect critical habitat outside the city

Policy LUP-1.12 **Development Adjacent to Agriculture.** The City shall require open space or other appropriate buffers for new development abutting productive agricultural areas to protect the viability of active agricultural operations outside of the city and ensure compatibility of uses with residents in adjacent areas.

Environmental Resources and Constraints Element

Goal ERC-9 Climate leadership and bold action to achieve carbon neutrality by 2045, aggressively reduce emissions by 2030, and increase climate resilience communitywide.



Policy ERC-9.12 **Regenerative Food System.** The City shall encourage regenerative agriculture practices in urban agriculture uses, including carbon-sequestering practices.

Sacramento City Code

The Sacramento City Code does not include sections related to agricultural resources that would apply to the proposed project.

4.2.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to agricultural resources. A discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

An impact is considered significant under Appendix G of the CEQA Guidelines if the proposed project would result in any of the following:

- Result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production (see Chapter 5, Effects Not Found to be Significant);
- Result in the loss of forest land or conversion of forest land to non-forest use (see Chapter 5, Effects Not Found to be Significant);
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses or conversion of forest land to non-forest uses; or
- Conflict with the requirements of the Cortese-Knox-Hertzberg act (Government Code Section 5600 et. seq.) pertaining to the conversion of agriculture.

As noted above, issues related to whether the proposed project would result in the following are discussed in Chapter 5, Effects Not Found to be Significant, of this EIR:

- Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production; and
- Result in the loss of forest land or conversion of forest land to non-forest use.

Method of Analysis

Evaluation of potential impacts of the proposed project on agricultural resources were based on the following: the Sacramento 2040 General Plan; the Sacramento 2040 General Plan MEIR; the USDA NRCS Web Soil Survey; the Soil Survey of Sacramento County, the Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Sacramento County; and prime farmland as defined by Government Code Section 56064 and set forth in the Sacramento LAFCo Policies, Standards and Procedures Manual.



In particular, the FMMP was used to identify and quantify the acreages of on-site Important Farmland. Similarly, the USDA NRCS Web Soil Survey was used to identify and evaluate on-site soils in order to assess the site's potential to qualify as "prime agricultural land," per the LAFCo definition. Because the entirety of the project site is proposed to be converted from the current agricultural designation to urban uses, the foregoing information was used to calculate the amount of Important Farmland and/or "prime agricultural land" that would be lost as a result of project buildout.

The standards of significance listed above are used to delineate the significance of any potential impacts.

Project-Specific Impacts and Mitigation Measures

The following discussion of agricultural impacts is based on the implementation of the proposed project unless otherwise noted.

4.2-1 Impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Based on the analysis below, even with implementation of mitigation, the impact is *significant and unavoidable*.

According to the Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Capay clay loam (113), Clear Lake clay (115), and Cosumnes silt loam (127) meet the criteria for Prime Farmland, while San Joaquin silt loam, leveled (213) and San Joaquin silt loam (214) meet the criteria for Farmland of Statewide Importance. As shown in Figure 4.2-2 above, the California DOC has determined that the project site contains Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Other Land. Potential impacts to Important Farmland within the industrial park and the nonparticipating parcels are discussed in the following sections. In addition, as previously discussed, the proposed off-site force main alignment, including each of the three potential force main segment options, occurs in existing roadway ROW or in other previously disturbed areas. Thus, installation of the off-site force main would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.

It should be noted that potential impacts related to compliance with the agricultural land policies of the California Government Code as implemented by the Sacramento LAFCo are addressed under Impact 4.2-4 below.

Industrial Park

The existing land uses within the industrial park are predominantly agricultural and contain approximately 31.3 acres of Prime Farmland and approximately 12.1 acres of Farmland of Statewide Importance. As shown in Figure 4.2-2, the portions of the site that qualify as Important Farmland are generally located in the northeastern corner of the project site, within the portion of the site planned for development of the industrial park. Based on the California DOC's definition, Prime Farmland must have been used for irrigated agricultural production at some time during the four years prior to the



mapping date. The project site has not been irrigated since 2018. As such, in October 2023, the City formally requested that the California DOC modify the map for the project site to reflect this information. However, because the California DOC Farmland Mapping and Monitoring Program has not yet been updated to reflect this request, this EIR has evaluated the 31.3 acres of Prime Farmland and 12.1 acres of Farmland of Statewide Importance at the project site. Buildout of the industrial park with industrial and commercial uses would permanently convert the existing on-site Prime Farmland and Farmland of Statewide Importance to non-agricultural uses, which could result in a significant impact.

Nonparticipating Parcels

The existing land uses within the portions of the nonparticipating parcels that are not currently planned for development include agricultural uses and vacant undeveloped land. While the nonparticipating parcels are not currently proposed for development, the parcels would receive City of Sacramento 2040 General Plan and Prezoning designations as part of the proposed Annexation. As such, the nonparticipating parcels are likely to be subject to future development. However, the land within the nonparticipating parcels is not defined as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, future development of the nonparticipating parcels would not result in significant impacts relating to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Conclusion

While the nonparticipating parcels do not contain land that is defined as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and, thus, would not result in negative impacts to such resources upon future development, construction activities on the rest of the project site would result in conversion of approximately 31.3 acres of Prime Farmland and approximately 12.1 acres of Farmland of Statewide Importance in the northeast corner of the project site. Therefore, because the proposed project would result in the conversion of Important Farmland to non-agricultural uses, a **significant** impact would occur.

Mitigation Measure(s)

As discussed in Chapter 4.4, Biological Resources, of this EIR, the easternmost portion of the project site, including the entirety of the nonparticipating parcels, are located within the Natomas Basin Habitat Conservation Plan (HCP) permit area boundaries. As discussed therein, the proposed project would be subject to applicable fees for the conversion of habitat to urban uses within the Natomas Basin HCP policy area. In addition, as discussed in Chapter 4.4, Biological Resources, surplus acreage under the City's Natomas Basin HCP allocation may be available for use by the remainder of the project site acreage. Thus, pursuant to Mitigation Measure 4.4-5(b), the proposed project would be required to identify appropriate lands to be set aside in permanent conservation easement at a ratio of one acre of habitat located within the Natomas Basin HCP policy area converted to urban land uses to 0.5-acre of habitat preserved. Therefore, although the proposed project would involve the conversion of farmland to non-agricultural uses, through compliance with Natomas Basin HCP requirements, open space lands would be preserved elsewhere at a 0.5:1 ratio. The following mitigation



would similarly require the preservation of off-site farmland at a ratio of one Farmland acre converted to urban land uses outside the Natomas Basin HCP policy area to 0.5-acre preserved, which, combined with the biological resources mitigation required by Mitigation Measure 4.4-5(b), would result in an overall preservation at a 1:1 ratio. While the following mitigation measure would preserve an equivalent acreage of Farmland elsewhere, the proposed project would result in the conversion of agricultural land to urban uses and would not create new agricultural land; as such, the proposed project would lead to an overall loss of Farmland. Therefore, although implementation of the following mitigation measure would reduce the above potentially significant impact, the impact would remain *significant and unavoidable*.

Industrial Park

4.2-1 *The City shall ensure that, prior to impacting agricultural/open space resources within the project site by the issuance of a grading permit, any and all project-related subdivision maps satisfy the On-Site Open Space and Off-Site Open Space requirements as defined herein. Open space dedications made pursuant to the Natomas Basin Habitat Conservation Plan (HCP) shall be made to the City and/or the Natomas Basin Conservancy and shall be located in the Natomas Basin. The remaining non-Natomas Basin HCP mitigation acreage may be located in unincorporated Sacramento County, Yolo County, and/or Sutter County, and may be held and managed by a qualified third-party entity with the approval of the City. Preservation shall be ensured in perpetuity via conservation easement, fee, or irrevocable offer of dedication to the satisfaction of the City.*

a. **On-Site Agricultural/Open Space Requirements:** *The following on-site open space properties are consistent with the mitigation requirements:*

- 86 acres of detention basins.
- 37.9 acres of freeway buffer.
- 2.3 acres of canal buffers.

b. **Off-site Agricultural/Open Space Requirements:** *The following Off-Site Open Space properties:*

- 141.51 acres of currently unidentified agricultural/open spaced mitigation property to be located in the unincorporated Sacramento County and/or unincorporated Sutter County.
- 50-acre habitat mitigation property APN 225-0020-014.
- 67.59-acre habitat mitigation property APN 225-0020-015.

c. **Phasing:** *The Airport South Industrial Project will develop in phases, as such, the amount of On-Site and Off-Site Open Space to be provided hereunder shall be in proportion to the amount of acreage proposed to*



be impacted by such development by the issuance of a grading permit therefor.

- d. With respect to each unidentified open space property listed above, and any proposed substitution of an open space property listed above, the City must determine, in writing, that the proposed agricultural/open space property and/or acreage satisfies the requirements for agricultural/open space to be counted towards the requisite Off-Site Agricultural/Open Space acreage total.
- e. Nothing in this Agricultural/Open Space Mitigation is intended to limit or restrict USFWS and CDFW in their consideration of Developer's applications for incidental take and/or other habitat mitigation permits or other entitlements under the federal Endangered Species Act and the California Endangered Species Act.

4.2-2 Impacts related to conflicts with existing zoning for agricultural uses or Williamson Act contracts. Based on the analysis below, the proposed project would result in a *less-than-significant* impact.

Potential impacts related to conflicts with existing zoning for agricultural uses or Williamson Act contracts within both the industrial park and the nonparticipating parcels are discussed together, below. In addition, as previously discussed, the proposed off-site force main alignment, including each of the three potential force main segment options, occurs in existing roadway ROW or in other previously disturbed areas. Thus, installation of the off-site force main would not conflict with zoning for agricultural uses of a Williamson Act contract.

Industrial Park and Nonparticipating Parcels

The project site is not subject to any Williamson Act contracts. The project site is currently located within Sacramento County and is not located within the City of Sacramento's SOI. Sacramento County's General Plan currently designates the site as Agricultural Cropland and the site is zoned Agricultural 80 (AG-80). As such, development of the proposed project would result in the conversion of agricultural land to non-agricultural uses; impacts related to such are addressed throughout this chapter.

With respect to the project's potential to conflict with the site's existing AG-80 zoning designation, in accordance with the Cortese-Knox-Hertzberg Local Government Reorganization Act (see Government Code Section 56375), the City would prezone the project site to M-1, M-1-PUD, and HC-PUD. The proposed project includes a request to be Prezoned to include 317.9 acres of Industrial Planned Unit Development (M-1-PUD) and 13.4 acres of Highway Commercial PUD (HC-PUD) for the industrial park portion of the project site, and 83 acres of Industrial (M-1) for the nonparticipating parcels. Should the proposed project be given approval by the Lead Agencies, the Sacramento LAFCo and the City of Sacramento, the foregoing Prezoning would take effect. Thus, following project approval, the proposed commercial uses would be consistent with the M-1-PUD



and HC-PUD zoning designations. Therefore, the proposed project would result in a **less-than-significant** impact in regard to conflicts with existing agricultural zoning or Williamson Act contracts.

Mitigation Measure(s)

None required.

4.2-3 Impacts related to involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses or conversion of forest land to non-forest uses. Based on the analysis below, the proposed project would result in a less-than-significant impact.

Potential impacts related to other changes in the existing environment that could result in the conversion of farmland to non-agricultural uses as a result of development of both the industrial park and the nonparticipating parcels are discussed together, below. It is noted that neither the project site, nor the surrounding parcels consist of forest land; thus, impacts related to such areas are not discussed in this analysis. In addition, as previously discussed, the proposed off-site force main alignment, including each of the three potential force main segment options, occurs in existing roadway ROW or in other previously disturbed areas. Thus, installation of the off-site force main would not result in the conversion of farmland to non-agricultural uses or conversion of forest land to non-forest uses.

Industrial Park and Nonparticipating Parcels

Existing land uses surrounding the project site include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

As discussed above, the parcels to the east and north of the project site are either currently developed or are under construction. Although the land west and south of the project site currently consist of undeveloped agricultural land, the parcels adjacent to the project site to the west are planned for future development as part of the Sacramento International Airport Master Plan. In addition, because the parcels south of the project site are not currently subject to agricultural uses and are located next to an existing school, the parcels are unlikely to be used for agricultural uses in the future. Therefore, the surrounding land uses would not be considered as productive agricultural areas and the project would not be required to provide buffers between the project site and the surrounding uses, pursuant to Policy LUP-1.12 of the City of Sacramento 2040 General Plan.



Based on the above, the proposed project would not involve changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.2-4 Impacts related to compliance with the requirements of the Cortese-Knox-Hertzberg act (Government Code, Section 56000 et. seq.) pertaining to the conversion of agricultural land. Based on the analysis below, the proposed project would result in a *significant and unavoidable* impact.

Potential impacts related to compliance with the policies of Sacramento LAFCo implementing the requirements of the Cortese-Knox-Hertzberg act pertaining to the conversion of agricultural land within both the industrial park and the nonparticipating parcels are discussed together, below. In addition, as previously discussed, the proposed off-site force main alignment, including each of the three potential force main segment options, occurs in existing roadway ROW or in other previously disturbed areas. Thus, installation of the off-site force main would not result in the conversion of farmland to non-agricultural uses.

Industrial Park and Nonparticipating Parcels

The proposed project site is currently located within Sacramento County and has a Sacramento County General Plan land use designation of Agricultural Cropland and is zoned AG-80. The proposed project would include a request for annexation of the 474.4-acre project site to the City of Sacramento, which ultimately requires the approval of Sacramento LAFCo.

As noted previously, the Sacramento LAFCo has specific policies related to agricultural land. For example, Sacramento LAFCo Policy IV-E, Agricultural Land Conservation, states that the Sacramento LAFCo will only approve the conversion of prime agricultural land to other uses if it is found that the proposal will lead to the planned, orderly, and efficient development of an area. As such, in compliance with Sacramento LAFCo Policy IV-E(1)(a), the project site is contiguous with lands that have been developed with urban uses. In addition, in compliance with Sacramento LAFCo Policy IV-E(1)(c), because the development of the entire project site would be likely to take place over five years, the proposed development would occur in phases.

Additional Sacramento LAFCo policies related to agricultural land include those related to the conversion of areas containing prime soils or productive agricultural operations to uses that are not conducive to agricultural production. Because the project site is proposed to be annexed into the City of Sacramento and the industrial park portion of the site is proposed for development, on-site soils are evaluated in comparison to the Sacramento LAFCo's definition of prime agricultural land in Table 4.2-4, pursuant to Government Code Section 56064. Should on-site soils meet any one criterion, such land would be considered prime agricultural land by Sacramento LAFCo.



The project site contains an approximate total of 385.3 acres of soils that qualify for rating as Class II when irrigated in the Soil Conservation Service land use capability classification. Criteria (a) of the Sacramento LAFCo’s definition of prime agricultural land applies to soils that qualify as Class I or Class II, regardless of whether the soil is non-irrigated or irrigated, provided that irrigation is feasible. Thus, as shown in Table 4.2-4, soils within the proposed project site meet criteria (a) to qualify as prime agricultural farmland under Section 56064 of the Cortese-Knox-Hertzberg Act. Therefore, the project would result in a **significant** impact with regards to compliance with LAFCo’s policies related to the conversion of agricultural land to urban uses.

| Table 4.2-4 LAFCo “Prime Agricultural Land” Comparison | | |
|---|---|--|
| Criteria | Discussion | |
| | Industrial Park | Nonparticipating Parcels |
| (a) Land that qualifies for rating as Class I or Class II in the Soil Conservation Service land use capability classification. | The majority of on-site soils are in Class II. The Class II soils have moderate limitations related to water interference and soil quality that reduce the choice of plans, or require special conservation practices. As such, the soils within the project site meet criterion (a). | Soils located within the nonparticipating parcels are in Class II and Class III. As such, the soils within the nonparticipating parcels have moderate to high limitations related to water interference and soil quality that reduce the choice of plans, or require special conservation practices. Therefore, the Class II soils within the nonparticipating parcels have the potential to meet criterion (a). |
| (b) Land that qualifies for rating 80 through 100 Storie Index Rating. | The on-site soils have a Storie Index Rating of Grade 2 to 4 (20 to 68). Therefore, the land does not meet criterion (b). | The conditions of the nonparticipating parcels do not differ from the industrial park. Therefore, the land within the nonparticipating parcels does not meet criterion (b). |
| (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Handbook on Range and Related Grazing Lands, July 1967, developed pursuant to Public Law 46, December 1935. | The Airport South Industrial Project Site has never been used as land that supports livestock for the production of food and fiber. Livestock is not supported for commercial purposes within the project site. As such, the land within the project site does not meet criterion (c). | The conditions of the nonparticipating parcels do not differ from the industrial park. Therefore, the land within the nonparticipating parcels does not meet criterion (c). |

(Continues on next page)



| Table 4.2-4 LAFCo "Prime Agricultural Land" Comparison | | |
|--|--|---|
| Criteria | Discussion | |
| | Industrial Park | Nonparticipating Parcels |
| (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual bases from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre. | Fruit or nut-bearing trees, vines, bushes, or crops are not currently growing within the project site. As such, the land within the industrial park portion of the project site does not meet criteria (d). | The conditions of the nonparticipating parcels do not differ from the industrial park. Therefore, the land within the nonparticipating parcels does not meet criteria (d). |
| (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years. | As discussed in criterion (d) above, the project site has not produced unprocessed agricultural crops with an annual gross value of four hundred dollars (\$400) or more per acre for any three of the past five years. Therefore, the land does not meet criterion (e). | The conditions of the nonparticipating parcels do not differ from the industrial park. Therefore, the land within the nonparticipating parcels does not meet criterion (e). |

Notes: The information and data gathered for Table 4.2-4 discussion was provided by various sources, including interviews with property owners and aerial photography.

Mitigation Measure(s)

Potential mitigation for impacts related to the conversion of prime agricultural land to non-agricultural uses could include purchasing agricultural conservation easements outside the project area. Implementation of mitigation measure 4.2-1 would help reduce the project’s potential impacts related to conversion of important farmland. However, as discussed under Impact 4.2-1, above, such mitigation would not create new agricultural land; rather, the mitigation would simply preserve existing agricultural land elsewhere. Feasible mitigation measures do not exist to reduce the above impact to a less-than-significant level. Therefore, the impact would remain *significant and unavoidable*.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.



Additional detail regarding the cumulative setting is included in Chapter 6, Statutorily Required Sections, of this EIR.

4.2-5 Impacts related to cumulative loss of agricultural land. Based on the analysis below, even with implementation of mitigation, the proposed project would result in a *significant and unavoidable* impact.

The City's 2040 General Plan MEIR determined that the net decrease of Important Farmland for crops from 2018 to 2020 within Sacramento County was 7,053 acres. Buildout of the 2040 General Plan could result in the further conversion, and therefore loss, of agricultural land to urban uses. Sufficient agricultural land does not exist within the City to be preserved in compensation with the amount of farmland converted to urban uses. Many of the goals and policies listed above encourage the continued productivity and preservation of existing local agricultural lands and operations in areas outside of the City.

Although the project site is not currently within the City's Sphere of Influence, following the proposed Annexation, the project would be required to comply with all applicable policies. However, the project was not anticipated within the City's General Plan MEIR analysis. As such, the most relevant cumulative setting for the proposed project is within Sacramento County.

According to the County's General Plan EIR, the County contains approximately 110,278 acres of Prime Farmland, 56,140 acres of Farmland of Statewide Importance, 15,187 acres of Unique Farmland, and 39,873 acres of Farmland of Local Importance. The County's General Plan EIR determined that even with the preservation of farmland at a one-to-one ratio, buildout of the County General Plan would result in a net loss of farmland, and a significant impact would occur.

Thus, development of the proposed project, as well as other development within the County's General Plan policy area, such as the proposed Upper Westside Specific Plan, the Sacramento International Airport Master Plan, the Grandpark Specific Plan, and Metro Air Park, would contribute to the aforementioned impact.

Because of the above, even with implementation of mitigation, the project's incremental contribution to the cumulative impact is ***cumulatively considerable*** and ***significant and unavoidable***.

Mitigation Measure(s)

Implementation of the following mitigation measure would help reduce the project's incremental contribution towards the cumulative impact related to conversion of important farmland. However, the impact would remain *significant and unavoidable* due to the permanent loss of agricultural land attributable to the project.

4.2-5 *Implement Mitigation Measure 4.2-1.*



4.3 AIR QUALITY, GREENHOUSE GAS EMISSIONS, AND ENERGY

4.3 AIR QUALITY, GREENHOUSE GAS EMISSIONS, AND ENERGY

4.3.1 INTRODUCTION

The Air Quality, Greenhouse Gas Emissions, and Energy chapter of the EIR describes the potential impacts of the proposed project on local and regional air quality emissions, potential impacts related to greenhouse gas (GHG) emissions and climate change, and potential impacts related to energy. The chapter includes a discussion of the existing air quality, GHG, and energy setting, the existing regulatory setting, as well as potential air quality, GHG, and energy impacts resulting from implementation of the project. In addition, the chapter includes mitigation measures warranted to reduce or eliminate any identified significant impacts. This chapter is based on the City of Sacramento 2040 General Plan,¹ the City of Sacramento 2040 Master EIR (MEIR),² the Sacramento Metropolitan Air Quality Management District (SMAQMD) CEQA Guide,³ and technical analysis performed by Raney Planning and Management, Inc. (see Appendix C).

As described further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall project site, and the nonparticipating parcels, which are primarily located in the southeastern portion of the overall site. While the entire project site is proposed for annexation into the City of Sacramento, only the industrial park is currently proposed for development. As such, the analysis herein includes a discussion of air quality, GHG, and energy impacts associated with the industrial park, the nonparticipating parcels, or a combination of the two project components, as applicable.

4.3.2 EXISTING ENVIRONMENTAL SETTING

The following information provides an overview of the existing environmental setting in relation to air quality within the proposed project area. Air basin characteristics, ambient air quality standards (AAQS), attainment status and regional air quality plans, local air quality monitoring, odors, sensitive receptors, information related to climate change and GHGs, and energy are discussed.

Air Basin Characteristics

The proposed project site is located in the City of Sacramento, which falls within the Sacramento Valley Air Basin (SVAB) and is within the jurisdictional boundaries of the SMAQMD. The SVAB is in the northern half of California's Great Valley and is bordered on three sides by mountain ranges. Air flows into the SVAB through the Carquinez Strait, moves across the Delta and carries pollutants from the heavily populated San Francisco Bay Area into the SVAB. The prevailing winds are moderate in strength and vary from moist clean breezes from the south to dry land flows from the north.

Most precipitation in the SVAB results from air masses moving in from the Pacific Ocean during the winter months. Storms usually move through the area from the west or northwest. During the

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

² City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.

³ Sacramento Metropolitan Air Quality Management District. *CEQA Guide*. April 2020.



winter rainy season (November through February) over half the total annual precipitation falls while the average winter temperature is a moderate 49 degrees Fahrenheit. During the summer, daytime temperatures can exceed 100 degrees Fahrenheit. Dense fog occurs mostly in mid-winter and rarely in the summer. The inland location and surrounding mountains shelter the valley from much of the ocean breeze that keeps the coastal regions moderate in temperature. The only breach in the mountain barrier is the Carquinez Strait, which exposes the midsection of the valley to the coastal air mass.

Ambient Air Quality Standards

Both the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established AAQS for common pollutants. The federal standards are divided into primary standards, which are designed to protect the public health, and secondary standards, which are designed to protect the public welfare. AAQS for each contaminant represent safe levels that avoid specific adverse health effects. Pollutants for which air quality standards have been established are called “criteria” pollutants. Table 4.3-1 identifies the major pollutants, characteristics, health effects and typical sources. The federal and California ambient air quality standards (NAAQS and CAAQS, respectively) are summarized in Table 4.3-2. The NAAQS and CAAQS were developed independently with differing purposes and methods. As a result, the federal and State standards differ in some cases. In general, the State of California standards are more stringent than the federal standards, particularly for ozone and particulate matter (PM).

A description of each criteria pollutant and its potential health effects is provided in the following section.

Ozone

Ozone is a reactive gas consisting of three oxygen atoms. In the troposphere, ozone is a product of the photochemical process involving the sun's energy, and is a secondary pollutant formed as a result of a complex chemical reaction between reactive organic gases (ROG) and oxides of nitrogen (NO_x) emissions in the presence of sunlight. As such, unlike other pollutants, ozone is not released directly into the atmosphere from any sources. In the stratosphere, ozone exists naturally and shields Earth from harmful incoming ultraviolet radiation. The primary source of ozone precursors is mobile sources, including cars, trucks, buses, construction equipment, and agricultural equipment. Ground-level ozone reaches the highest level during the afternoon and early evening hours. High levels occur most often during the summer months. Ground-level ozone is a strong irritant that could cause constriction of the airways, forcing the respiratory system to work harder in order to provide oxygen. Ozone at the Earth's surface causes numerous adverse health effects and is a major component of smog. High concentrations of ground level ozone can adversely affect the human respiratory system and aggravate cardiovascular disease and many respiratory ailments.

Reactive Organic Gas

ROG refers to several reactive chemical gases composed of hydrocarbon compounds typically found in paints and solvents that contributes to the formation of smog and ozone by involvement in atmospheric chemical reactions. A separate health standard does not exist for ROG. However, some compounds that make up ROG are toxic, such as the carcinogen benzene.

Oxides of Nitrogen

NO_x are a family of gaseous nitrogen compounds and are precursors to the formation of ozone and particulate matter.



**Table 4.3-1
 Summary of Criteria Pollutants**

| Pollutant | Characteristics | Health Effects | Major Sources |
|--|--|--|---|
| Ozone | A highly reactive gas produced by the photochemical process involving a chemical reaction between the sun's energy and other pollutant emissions. Often called photochemical smog. | <ul style="list-style-type: none"> • Eye irritation • Wheezing, chest pain, dry throat, headache, or nausea • Aggravated respiratory disease such as emphysema, bronchitis, and asthma | Combustion sources such as factories, automobiles, and evaporation of solvents and fuels. |
| Carbon Monoxide | An odorless, colorless, highly toxic gas that is formed by the incomplete combustion of fuels. | <ul style="list-style-type: none"> • Impairment of oxygen transport in the bloodstream • Impaired vision, reduced alertness, chest pain, and headaches • Can be fatal in the case of very high concentrations | Automobile exhaust, combustion of fuels, and combustion of wood in woodstoves and fireplaces. |
| Nitrogen Dioxide | A reddish-brown gas that discolors the air and is formed during combustion of fossil fuels under high temperature and pressure. | <ul style="list-style-type: none"> • Lung irritation and damage • Increased risk of acute and chronic respiratory disease | Automobile and diesel truck exhaust, industrial processes, and fossil-fueled power plants. |
| Sulfur Dioxide | A colorless, irritating gas with a rotten egg odor formed by combustion of sulfur-containing fossil fuels. | <ul style="list-style-type: none"> • Aggravation of chronic obstruction lung disease • Increased risk of acute and chronic respiratory disease | Diesel vehicle exhaust, oil-powered power plants, and industrial processes. |
| Particulate Matter (PM ₁₀ and PM _{2.5}) | A complex mixture of extremely small particles and liquid droplets that can easily pass through the throat and nose and enter the lungs. | <ul style="list-style-type: none"> • Aggravation of chronic respiratory disease • Heart and lung disease • Coughing • Bronchitis • Chronic respiratory disease in children • Irregular heartbeat • Nonfatal heart attacks | Combustion sources such as automobiles, power generation, industrial processes, and wood burning. Also from unpaved roads, farming activities, and fugitive windblown dust. |
| Lead | A metal found naturally in the environment as well as in manufactured products. | <ul style="list-style-type: none"> • Loss of appetite, weakness, apathy, and miscarriage • Lesions of the neuromuscular system, circulatory system, brain, and gastrointestinal tract | Industrial sources and combustion of leaded aviation gasoline. |

Sources:

- **California Air Resources Board. California Ambient Air Quality Standards (CAAQS). Available at: <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>. Accessed February 2024.**
- **Sacramento Metropolitan, El Dorado, Feather River, Placer, and Yolo-Solano Air Districts, Spare the Air website. Air Quality Information for the Sacramento Region. Available at: sparetheair.com. Accessed February 2024.**
- **California Air Resources Board. Glossary of Air Pollution Terms. Available at: <https://ww2.arb.ca.gov/glossary>. Accessed February 2024.**



**Table 4.3-2
 Ambient Air Quality Standards**

| Pollutant | Averaging Time | CAAQS | NAAQS | |
|---|------------------|-----------------------|-----------------------|----------------------|
| | | | Primary | Secondary |
| Ozone | 1 Hour | 0.09 ppm | - | Same as primary |
| | 8 Hour | 0.070 ppm | 0.070 ppm | |
| Carbon Monoxide | 8 Hour | 9 ppm | 9 ppm | - |
| | 1 Hour | 20 ppm | 35 ppm | |
| Nitrogen Dioxide | Annual Mean | 0.030 ppm | 53 ppb | Same as primary |
| | 1 Hour | 0.18 ppm | 100 ppb | - |
| Sulfur Dioxide | 24 Hour | 0.04 ppm | - | - |
| | 3 Hour | - | - | 0.5 ppm |
| | 1 Hour | 0.25 ppm | 75 ppb | - |
| Respirable Particulate Matter (PM ₁₀) | Annual Mean | 20 ug/m ³ | - | Same as primary |
| | 24 Hour | 50 ug/m ³ | 150 ug/m ³ | |
| Fine Particulate Matter (PM _{2.5}) | Annual Mean | 12 ug/m ³ | 12 ug/m ³ | 15 ug/m ³ |
| | 24 Hour | - | 35 ug/m ³ | Same as primary |
| Lead | 30 Day Average | 1.5 ug/m ³ | - | - |
| | Calendar Quarter | - | 1.5 ug/m ³ | Same as primary |
| Sulfates | 24 Hour | 25 ug/m ³ | - | - |
| Hydrogen Sulfide | 1 Hour | 0.03 ppm | - | - |
| Vinyl Chloride | 24 Hour | 0.010 ppm | - | - |
| Visibility Reducing Particles | 8 Hour | (see note) | - | - |

ppm = parts per million
 ppb = parts per billion
 ug/m³ = micrograms per cubic meter

Note: Statewide Visibility Reducing Particle Standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Source: California Air Resources Board. Ambient Air Quality Standards. May 4, 2016. Available at: <https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf>. Accessed February 2024.

The major component of NO_x, nitrogen dioxide (NO₂), is a reddish-brown gas that discolors the air and is toxic at high concentrations. NO_x results primarily from the combustion of fossil fuels under high temperature and pressure. On-road and off-road motor vehicles and fuel combustion are the major sources of NO_x. NO_x reacts with ROG to form smog, which could result in adverse impacts to human health, damage the environment, and cause poor visibility. Additionally, NO_x emissions are a major component of acid rain. Health effects related to NO_x include lung irritation and lung damage and can cause increased risk of acute and chronic respiratory disease.

Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless, poisonous gas produced by incomplete burning of carbon-based fuels such as gasoline, oil, and wood. When CO enters the body, the CO combines with chemicals in the body, which prevents blood from carrying oxygen to cells, tissues, and organs. Symptoms of exposure to CO can include problems with vision, reduced alertness,



and general reduction in mental and physical functions. Exposure to CO can result in chest pain, headaches, reduced mental alertness, and death at high concentrations.

Sulfur Dioxide

Sulfur Dioxide (SO₂) is a colorless, irritating gas with a rotten egg odor formed primarily by the combustion of sulfur-containing fossil fuels from mobile sources, such as locomotives, ships, and off-road diesel equipment. SO₂ is also emitted from several industrial processes, such as petroleum refining and metal processing. Similar to airborne NO_x, suspended sulfur oxide particles contribute to poor visibility. The sulfur oxide particles are also a component of particulate matter, discussed below.

Particulate Matter

Particulate matter, also known as particle pollution or PM, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health impacts. The USEPA is concerned about particles that are 10 micrometers in diameter or smaller (PM₁₀) because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, the particles could affect the heart and lungs and cause serious health effects. USEPA groups particle pollution into three categories based on their size and where they are deposited:

- "Inhalable coarse particles (PM_{2.5-10})," which are found near roadways and dusty industries, are between 2.5 and 10 micrometers in diameter. PM_{2.5-10} is deposited in the thoracic region of the lungs.
- "Fine particles (PM_{2.5})," which are found in smoke and haze, are 2.5 micrometers in diameter and smaller. PM_{2.5} particles could be directly emitted from sources such as forest fires, or could form when gases emitted from power plants, industries, and automobiles react in the air. They penetrate deeply into the thoracic and alveolar regions of the lungs.
- "Ultrafine particles (UFP)," are very, very small particles (less than 0.1 micrometers in diameter) largely resulting from the combustion of fossil fuels, meat, wood, and other hydrocarbons. While UFP mass is a small portion of PM_{2.5}, their high surface area, deep lung penetration, and transfer into the bloodstream could result in disproportionate health impacts relative to their mass. UFP is not currently regulated separately, but is analyzed as part of PM_{2.5}.

PM₁₀, PM_{2.5}, and UFP include primary pollutants, which are emitted directly to the atmosphere and secondary pollutants, which are formed in the atmosphere by chemical reactions among precursors. Generally speaking, PM_{2.5} and UFP are emitted by combustion sources like vehicles, power generation, industrial processes, and wood burning, while PM₁₀ sources include the same sources plus roads and farming activities. Fugitive windblown dust and other area sources also represent a source of airborne dust. Long-term PM pollution, especially fine particles, could result in significant health problems including, but not limited to, the following: increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing; decreased lung function; aggravated asthma; development of chronic respiratory disease in children; development of chronic bronchitis or obstructive lung disease; irregular heartbeat; heart attacks; and increased blood pressure.



Visibility Reducing Particles

Visibility reducing particles are a mixture of suspended particulate matter consisting of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. The standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Lead

Lead is a relatively soft and chemically resistant metal that is a natural constituent of air, water, and the biosphere. Lead forms compounds with both organic and inorganic substances. As an air pollutant, lead is present in small particles. Sources of lead emissions in California include a variety of industrial activities. Gasoline-powered automobile engines were a major source of airborne lead through the use of leaded fuels. The use of leaded fuel has been mostly phased out, with the result that ambient concentrations of lead have dropped dramatically. However, because lead was emitted in large amounts from vehicles when leaded gasoline was used, lead is present in many soils (especially urban soils) as a result of airborne dispersion and could become re-suspended into the air.

Because lead is slowly excreted by the human body, exposure to small amounts of lead from a variety of sources could accumulate to harmful levels. Effects from inhalation of lead above the level of the AAQS may include impaired blood formation and nerve conduction. Lead can adversely affect the nervous, reproductive, digestive, immune, and blood-forming systems. Symptoms could include fatigue, anxiety, short-term memory loss, depression, weakness in the extremities, and learning disabilities in children. Lead also causes cancer.

Sulfates

Sulfates are the fully oxidized ionic form of sulfur and are colorless gases. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. The sulfur is oxidized to SO₂ during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO₂ to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features.

The sulfates standard established by CARB is designed to prevent aggravation of respiratory symptoms. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardiopulmonary disease. Sulfates are particularly effective in degrading visibility, and, because they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide

Hydrogen sulfide (H₂S) is associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. Hydrogen sulfide is extremely hazardous in high concentrations, especially in enclosed spaces (800 parts per million [ppm] can cause death).

Vinyl Chloride

Vinyl chloride (C₂H₃Cl, also known as VCM) is a colorless gas that does not occur naturally, but is formed when other substances such as trichloroethane, trichloroethylene, and tetrachloroethylene are broken down. Vinyl chloride is used to make polyvinyl chloride (PVC) which is used



to make a variety of plastic products, including pipes, wire and cable coatings, and packaging materials.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are also a category of environmental concern. TACs are present in many types of emissions with varying degrees of toxicity. Public exposure to TACs can result from emissions from normal operations, as well as accidental releases. Common stationary sources of TACs include gasoline stations, dry cleaners, and diesel backup generators, which are subject to SMAQMD stationary source permit requirements. The other, often more significant, common source type is on-road motor vehicles, such as cars and trucks, on freeways and roads, and off-road sources such as construction equipment, ships, and trains.

Fossil fueled combustion engines, including those used in cars, trucks, and some pieces of construction equipment, release at least 40 different TACs. In terms of health risks, the most volatile contaminants are diesel particulate matter (DPM), benzene, formaldehyde, 1,3-butadiene, toluene, xylenes, and acetaldehyde. Gasoline vapors contain several TACs, including benzene, toluene, and xylenes. Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust, DPM, is composed of carbon particles and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of such chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including ROG and NO_x. Due to the published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects, the CARB has identified DPM from diesel-fueled engines as a TAC. Although a variety of TACs are emitted by fossil fueled combustion engines, the cancer risk due to DPM exposure represents a more significant risk than the other TACs discussed above.⁴

More than 90 percent of DPM is less than one micrometer in diameter, and, thus, DPM is a subset of PM_{2.5}. As a California statewide average, DPM comprises about eight percent of PM_{2.5} in outdoor air, although DPM levels vary regionally due to the non-uniform distribution of sources throughout the State. Most major sources of diesel emissions, such as ships, trains, and trucks, operate in and around ports, rail yards, and heavily-traveled roadways. Such areas are often located near highly populated areas. Accordingly, elevated DPM levels are mainly an urban problem, with large numbers of people exposed to higher DPM concentrations, resulting in greater health consequences compared to rural areas.

Due to the high levels of diesel activity, high volume freeways, stationary diesel engines, rail yards and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Construction-related activities also have the potential to generate concentrations of DPM from on-road haul trucks and off-road equipment exhaust emissions.

Health risks from TACs are a function of both the concentration of emissions and the duration of exposure, which typically are associated with long-term exposure and the associated risk of contracting cancer. Health effects of exposure to TACs other than cancer include birth defects, neurological damage, and death. Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and federal level. The identification, regulation, and

⁴ California Air Resources Board. *Reducing Toxic Air Pollutants in California's Communities*. February 6, 2002.



monitoring of TACs is relatively new compared to criteria air pollutants that have established AAQS. TACs are regulated or evaluated on the basis of risk to human health rather than comparison to an AAQS or emission-based threshold.

Attainment Status and Regional Air Quality Plans

The Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA) require all areas of California to be classified as attainment, nonattainment, or unclassified as to their status with regard to the NAAQS and/or CAAQS. The FCAA and CCAA require that the CARB, based on air quality monitoring data, designate portions of the State where the federal or State AAQS are not met as “nonattainment areas.” Because of the differences between the national and State standards, the designation of nonattainment areas is different under the federal and State legislation. The CCAA requires local air pollution control districts to prepare air quality attainment plans. These plans must provide for district-wide emission reductions of five percent per year averaged over consecutive three-year periods or, provide for adoption of “all feasible measures on an expeditious schedule.”

As presented in Table 4.3-3, under the CCAA, Sacramento County has been designated nonattainment for the State and federal one-hour ozone, State and federal eight-hour ozone, State PM₁₀, and federal PM_{2.5} standards. The County is designated attainment or unclassified for all other AAQS.

| Table 4.3-3 Sacramento County Attainment Status Designations | | | |
|--|-------------------------|-----------------------------|-------------------------------|
| Pollutant | Averaging Time | California Standards | Federal Standards |
| Ozone | 1 Hour | Nonattainment | Nonattainment |
| | 8 Hour | Nonattainment | Nonattainment |
| Carbon Monoxide | 8 Hour | Attainment | Attainment |
| | 1 Hour | Attainment | Attainment |
| Nitrogen Dioxide | Annual Mean | Attainment | Unclassifiable/ Attainment |
| | 1 Hour | Attainment | Unclassifiable/ Attainment |
| Sulfur Dioxide | 24 Hour | Attainment | - |
| | 1 Hour | Attainment | Attainment |
| Respirable Particulate Matter (PM₁₀) | Annual Mean | Nonattainment | - |
| | 24 Hour | Nonattainment | Attainment |
| Fine Particulate Matter (PM_{2.5}) | Annual Mean | Attainment | Attainment |
| | 24 Hour | - | Nonattainment |
| Lead | Rolling 3-Month Average | Attainment | Attainment |
| Sulfates | 24 Hour | Attainment | - |
| Source: Sacramento Metropolitan Air Quality Management District. Air Quality Pollutants and Standards. Available at: http://www.airquality.org/air-quality-health/air-quality-pollutants-and-standards . Accessed February 2024. | | | |

Due to the nonattainment designations, the SMAQMD, along with the other air districts in the SVAB region, is required to develop plans to attain the federal and State standards for ozone and particulate matter. The air quality plans include emissions inventories to measure the sources of air pollutants, to evaluate how well different control measures have worked, and show how air



pollution would be reduced. In addition, the plans include the estimated future levels of pollution to ensure that the area would meet air quality goals. Each of the attainment plans currently in effect are discussed in further detail in the Regulatory Context section of this chapter.

Local Air Quality Monitoring

Air quality is monitored by CARB at various locations to determine which air quality standards are being violated, and to direct emission reduction efforts, such as developing attainment plans and rules, incentive programs, etc. The nearest local air quality monitoring station to the project site is the Sacramento – T Street station, located at 1309 T Street in Sacramento, CA, approximately eight miles southeast of the project site. Table 4.3-4 shows historical occurrences of pollutant levels exceeding the State and federal AAQS for the three-year period from 2020 to 2022.

| Table 4.3-4 Air Quality Data Summary (2020-2022) | | | | |
|---|-----------------|-----------------------------------|-------------|-------------|
| Pollutant | Standard | Days Standard Was Exceeded | | |
| | | 2020 | 2021 | 2022 |
| 1-Hour Ozone | State | 1 | 0 | 1 |
| | Federal | 0 | 0 | 0 |
| 8-Hour Ozone | State | 3 | 1 | 3 |
| | Federal | 3 | 1 | 3 |
| 24-Hour PM _{2.5} | Federal | 6 | 4 | 0 |
| 24-Hour PM ₁₀ | State | 59 | 12 | 6 |
| | Federal | 4 | 0 | 0 |
| 1-Hour Nitrogen Dioxide | State | 0 | 0 | 0 |
| | Federal | 0 | 0 | 0 |

Source: California Air Resources Board. Aerometric Data Analysis and Management (iADAM) System. Available at <http://www.arb.ca.gov/adam/welcome.html>. Accessed February 2024.

Odors

While offensive odors rarely cause physical harm, they can be unpleasant, leading to considerable annoyance and distress among the public and can generate citizen complaints to local governments and air districts. The potential for an odor impact is dependent on a number of variables including the nature of the odor source, distance between a receptor and an odor source, and local meteorological conditions. One of the most important factors influencing the potential for an odor impact to occur is the distance between the odor source and receptors, also referred to as a buffer zone or setback. The greater the distance between an odor source and receptor, the less concentrated the odor emission would be when reaching the receptor.

Meteorological conditions also affect the dispersion of odor emissions, which determines the exposure concentration of odiferous compounds at receptors. The predominant wind direction in an area influences which receptors are exposed to the odiferous compounds generated by a nearby source. Receptors located upwind from a large odor source may not be affected due to the produced odiferous compounds being dispersed away from the receptors. Wind speed also influences the degree to which odor emissions are dispersed away from any area.

Odiferous compounds could be generated from a variety of source types including both construction and operational activities. Examples of common land use types that typically generate significant odor impacts include, but are not limited to, wastewater treatment plants, sanitary landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging



plants. The project site is not located in the vicinity of any such land uses. Although less common, diesel fumes associated with substantial diesel-fueled equipment and heavy-duty trucks, such as from construction activities, freeway traffic, or distribution centers, can be found to be objectionable.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, day care centers, playgrounds, and medical facilities. The nearest sensitive receptors include the single-family residences and Paso Verde K-8 School, located approximately 200 feet east and 200 feet south of the project site, respectively.

Greenhouse Gas Emissions

GHGs are gases that absorb and emit radiation within the thermal infrared range, trapping heat in the Earth's atmosphere. Some GHGs occur naturally and are emitted into the atmosphere through both natural processes and human activities. Other GHGs are created and emitted solely through human activities. The principal GHGs that enter the atmosphere due to human activities are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated carbons. Other common GHGs include water vapor, ozone, and aerosols. The increase in atmospheric concentrations of GHG due to human activities has resulted in more heat being held within the atmosphere, which is the accepted explanation for global climate change.

The primary GHG emitted by human activities is CO₂, with the next largest components being CH₄ and N₂O. A wide variety of human activities result in the emission of CO₂. Some of the largest sources of CO₂ include the burning of fossil fuels for transportation and electricity, industrial processes including fertilizer production, agricultural processing, and cement production. The primary sources of CH₄ emissions include domestic livestock sources, decomposition of wastes in landfills, releases from natural gas systems, coal mine seepage, and manure management. The main human activities producing N₂O are agricultural soil management, fuel combustion in motor vehicles, nitric acid production, manure management, and stationary fuel combustion. Emissions of GHG by economic sector indicate that energy-related activities account for the majority of U.S. emissions. Electricity generation is the largest single-source of GHG emissions, and transportation is the second largest source, followed by industrial activities. The agricultural, commercial, and residential sectors account for the remainder of GHG emission sources.⁵

Emissions of GHG are partially offset by uptake of carbon and sequestration in trees, agricultural soils, landfilled yard trimmings and food scraps, and absorption of CO₂ by the Earth's oceans. Additional emission reduction measures for GHG could include, but are not limited to, compliance with local, State, or federal plans or strategies for GHG reductions, on-site and off-site mitigation, and project design features. Attainment concentration standards for GHGs have not been established by the federal or State government.

⁵ U.S. Environmental Protection Agency. *Sources of Greenhouse Gas Emissions*. Available at: https://19january2017snapshot.epa.gov/ghgemissions/sources-greenhouse-gas-emissions_.html. Accessed February 2024.



Global Warming Potential

Global warming potential (GWP) is one type of simplified index (based upon radiative properties) that can be used to estimate the potential future impacts of emissions of various gases. According to the USEPA, the GWP of a gas, or aerosol, to trap heat in the atmosphere is the “cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas.” The reference gas for comparison is CO₂. GWP is based on a number of factors, including the heat-absorbing ability of each gas relative to that of CO₂, as well as the decay rate of each gas relative to that of CO₂. Each gas’s GWP is determined by comparing the radiative forcing associated with emissions of that gas versus the radiative forcing associated with emissions of the same mass of CO₂, for which the GWP is set at one. Methane gas, for example, is estimated by the USEPA to have a comparative global warming potential 25 times greater than that of CO₂, as shown in Table 4.3-5.

| Gas | Atmospheric Lifetime (years) | GWP (100 year time horizon) |
|--|---------------------------------|--------------------------------|
| Carbon Dioxide (CO ₂) | 50-200 ¹ | 1 |
| Methane (CH ₄) | 12 | 25 |
| Nitrous Oxide (N ₂ O) | 114 | 298 |
| HFC-23 | 270 | 14,800 |
| HFC-134a | 14 | 1,430 |
| HFC-152a | 1.4 | 124 |
| PFC: Tetrafluoromethane (CF ₄) | 50,000 | 7,390 |
| PFC: Hexafluoroethane (C ₂ F ₆) | 10,000 | 12,200 |
| Sulfur Hexafluoride (SF ₆) | 3,200 | 22,800 |

¹ For a given amount of CO₂ emitted, some fraction of the atmospheric increase in concentration is quickly absorbed by the oceans and terrestrial vegetation, some fraction of the atmospheric increase will only slowly decrease over a number of years, and a small portion of the increase will remain for many centuries or more.

Source: USEPA. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019 [Table 1-2]. April 14, 2021.

As shown in the table, at the extreme end of the scale, sulfur hexafluoride is estimated to have a comparative GWP 22,800 times that of CO₂. The atmospheric lifetimes of such GHGs are estimated by the USEPA to vary from 50 to 200 years for CO₂, to 50,000 years for CF₄. Longer atmospheric lifetimes allow GHG to buildup in the atmosphere; therefore, longer lifetimes correlate with the GWP of a gas. The common indicator for GHG is expressed in terms of metric tons of CO₂ equivalents (MTCO₂e), which is calculated based on the GWP for each pollutant.

Effects of Global Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The Intergovernmental Panel on Climate Change’s (IPCC) Climate Change 2021: The Physical Science Basis report indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia.⁶ Signs that global climate change has occurred include:

⁶ Intergovernmental Panel on Climate Change. *Climate Change 2021: The Physical Science Basis Summary for Policymakers*. Available at: https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf. Accessed February 2024.



- Warming of the atmosphere and ocean;
- Diminished amounts of snow and ice;
- Rising sea levels; and
- Ocean acidification.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The Office of Environmental Health Hazard Assessment (OEHHA) identified various indicators of climate change in California, which are scientifically based measurements that track trends in various aspects of climate change. Many indicators reveal discernable evidence that climate change is occurring in California and is having significant, measurable impacts in the State. Changes in the State's climate have been observed, including:

- An increase in annual average air temperature with record warmth;
- More frequent extreme heat events;
- More extreme drought;
- A decline in winter chill; and
- An increase in variability of statewide precipitation.

Warming temperatures and changing precipitation patterns have altered California's physical systems – the ocean, lakes, rivers and snowpack – upon which the State depends. Winter snowpack and spring snowmelt runoff from the Sierra Nevada and southern Cascade Mountains provide approximately one-third of the State's annual water supply. Impacts of climate on physical systems have been observed, such as high variability of snow-water content (i.e., amount of water stored in snowpack), decrease in snowmelt runoff, glacier change (loss in area), rise in sea levels, increase in average lake water temperature and coastal ocean temperature, and a decrease in dissolved oxygen in coastal waters. Impacts of climate change on biological systems, including humans, wildlife, and vegetation, have also been observed, including climate change impacts on terrestrial, marine, and freshwater ecosystems.

In the Sacramento region, specifically, global climate change hazards include extreme heat and flooding. California's Fourth Climate Change Assessment predicts that the Sacramento Valley region is expected to see an average daily temperature maximum increase of 10 degrees Fahrenheit by the end of the century. Additionally, Midtown Sacramento is anticipated to experience up to 40 days per year of extreme heat (>103.9 F), as compared to the approximately four days per year that occur now.⁷ Such extreme heat events pose a public health hazard. In addition to extreme heat, the Sacramento region is anticipated to experience more extreme floods, greater floodplain vulnerability, and higher Delta water levels.⁸ Although average annual precipitation is not anticipated to substantially change in the next 50 to 75 years, precipitation will likely be delivered in more intense storms and over the course of a shorter wet season.⁹

⁷ Governor's Office of Planning and Research, California Energy Commission, and California Natural Resources Agency. *California's Fourth Climate Change Assessment, Sacramento Valley Region Report* [page 18]. August 2018.

⁸ *Ibid.*

⁹ Cal-Adapt. *Local Climate Change Snapshot for Sacramento, California*, Available at: <https://cal-adapt.org/tools/local-climate-change-snapshot>. Accessed February 2024.



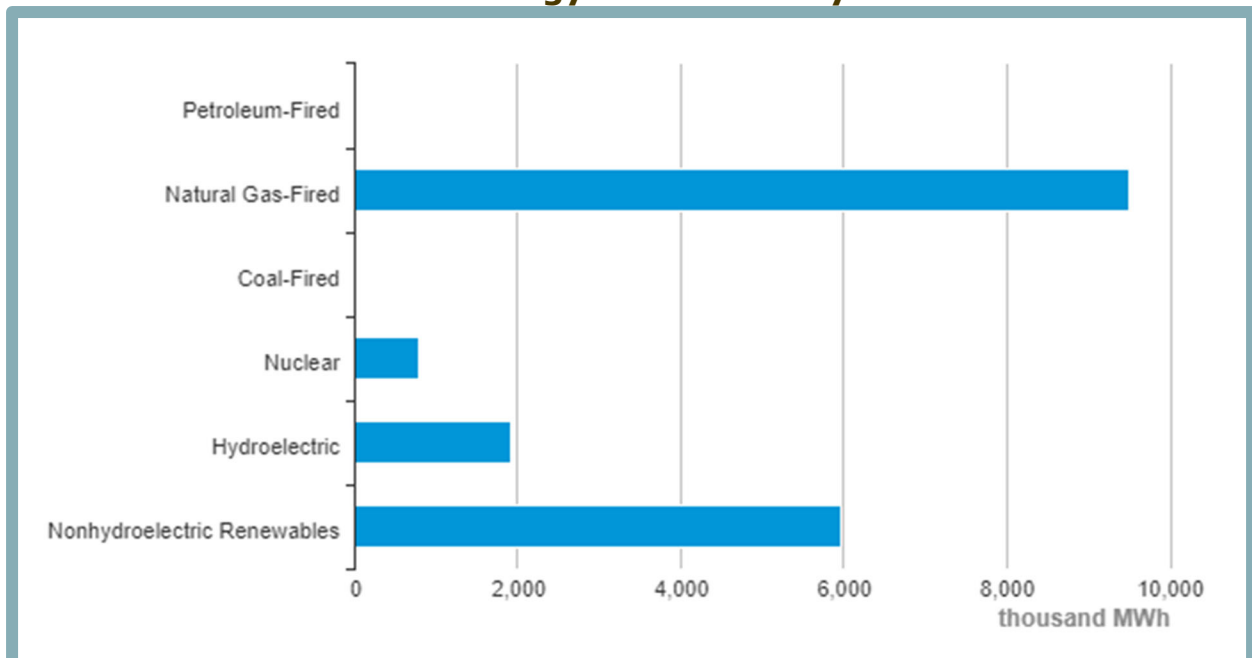
Energy Use in the State

California is one of the highest energy demanding states within the nation. According to the U.S. Department of Energy, the State consumes approximately 303,300 gigawatt-hours (GWh) of electricity per year.¹⁰ Activities such as heating and cooling structures, lighting, the movement of goods, agricultural production, and other facets of daily life consume a variety of energy sources. However, despite California's high rate of energy use, the State has one of the lowest per capita energy consumption levels in the U.S.

Energy within the State is provided primarily to consumers through a mix of sources including natural gas, hydroelectric, non-hydroelectric renewable sources, nuclear, coal, and petroleum. California is the nation's top producer of electricity from solar, geothermal, and biomass energy. In 2021, California was the nation's top producer of electricity from solar, geothermal, and biomass energy. The state was fourth in the nation in conventional hydroelectric power generation, down from second in 2019, in part because of drought and increased water demand. Renewable resources, including hydropower and small-scale (less than 1-megawatt), customer-sited solar photovoltaic (PV) systems, supplied more than half of California's in-state electricity generation, and natural gas-fired power plants provided two-fifths.

Figure 4.3-1 presents the sources that are used to produce energy in the State. As presented therein, energy is mostly generated from natural gas combustion, followed by non-hydroelectric renewables (such as wind and solar) and hydroelectric. Figure 4.3-2 presents energy consumption within California for the most recent year for which data is available (2021). As shown in the figure, transportation-related activity consumes the largest single share of energy within the State. The second largest consumer is the industrial sector.

**Figure 4.3-1
California Energy Generation by Source**

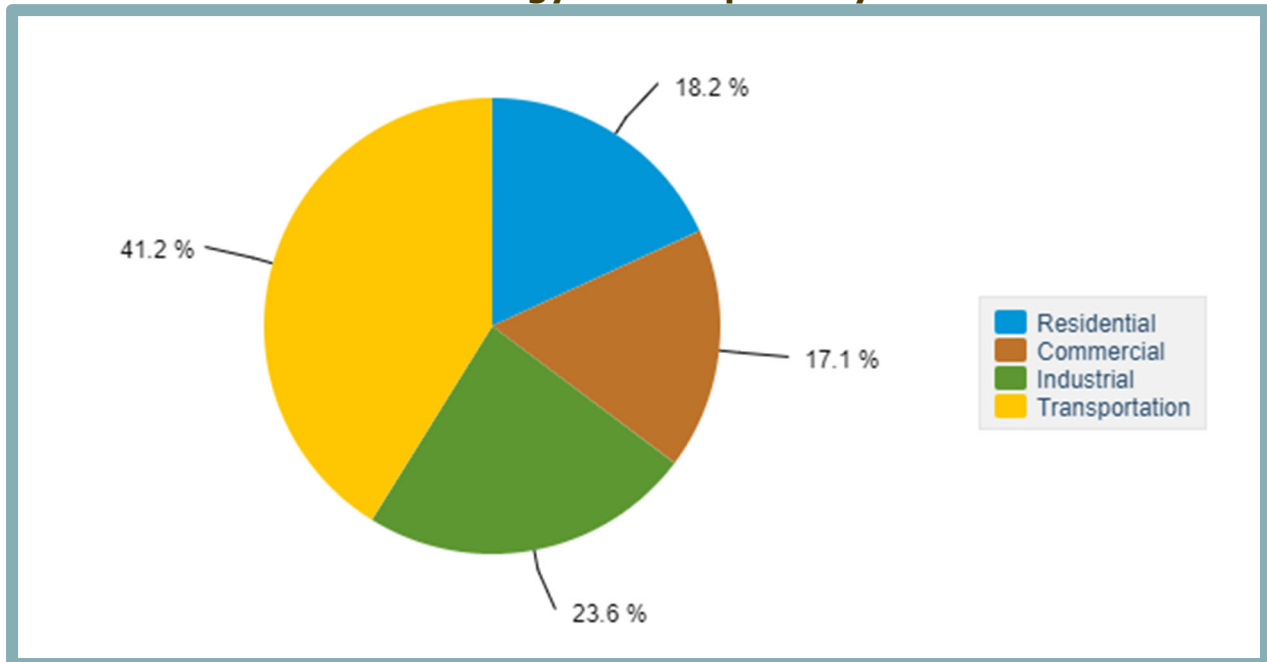


Source: U.S. Energy Information Administration. *California: State Profile and Energy Estimates*. Accessible at: <https://www.eia.gov/state/index.php?sid=CA>. Accessed February 2024.

¹⁰ U.S. Department of Energy. *State of California Energy Sector Risk Profile*. March 2021.



**Figure 4.3-2
California Energy Consumption By Sector**



Source: U.S. Energy Information Administration. *California: State Profile and Energy Estimates*. Accessible at: <https://www.eia.gov/state/index.php?sid=CA>. Accessed February 2024.

Of the total electricity supplied to the State in 2022, Sacramento County consumed approximately 11,410 GWh, which constitutes approximately 3.76 percent of the total energy consumed within the State.¹¹

Energy Consumption at the Project Site

Electricity in the project area is currently provided by the Sacramento Municipal Utility District (SMUD), and natural gas is provided by Pacific Gas and Electric (PG&E). However, the project site (including both the industrial park and nonparticipating parcels) is currently undeveloped except for Bayou Way, which winds through the northern portion of the project site. Structures do not exist on-site; however, a cell tower is located in the northwestern portion of the site. As a result, the project site currently generates a minor demand for energy resources.

4.3.3 REGULATORY CONTEXT

Air quality, GHG emissions, and energy consumption are monitored and regulated through the efforts of various international, federal, State, and local government agencies. Agencies work jointly and individually to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for regulating and improving the air quality within the project area and monitoring or reducing GHG emissions and energy consumption are discussed below.

¹¹ California Energy Commission. *Electricity Consumption by County*. Available at: <http://ecdms.energy.ca.gov/elecbycounty.aspx>. Accessed February 2024.



Federal Regulations Related to Air Quality

The following discussion provides a summary of the federal regulations relevant to air quality, organized by pollutant type.

Criteria Pollutants

The FCAA, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The USEPA is responsible for implementing most aspects of the FCAA, including setting NAAQS for major air pollutants; setting hazardous air pollutant standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric ozone protection measures, and enforcement provisions. Under the FCAA, NAAQS are established for the following criteria pollutants: ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for ozone, NO₂, SO₂, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for ozone, NO₂, SO₂, PM₁₀, PM_{2.5} are based on statistical calculations over one- to three-year periods, depending on the pollutant. The FCAA requires the USEPA to reassess the NAAQS at least every five years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

Hazardous Air Pollutants/Toxic Air Contaminants

The 1977 FCAA amendments required the USEPA to identify national emission standards for hazardous air pollutants to protect public health and welfare. Hazardous air pollutants include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 FCAA Amendments, which expanded the control program for hazardous air pollutants, 189 substances and chemical families were identified as hazardous air pollutants.

Federal Regulations Related to GHG Emissions

The following are the federal regulations relevant to GHG emissions.

Federal Vehicle Standards

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, USEPA, and National Highway Traffic Safety Administration (NHTSA) to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 through 2025 light-duty vehicles. The proposed standards were projected to achieve emission rates as low as 163 grams of CO₂ per mile by model year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if the foregoing emissions level was achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 through 2021 (77 FR 62624–63200), and NHTSA intended to set standards for model years 2022 through 2025 in future rulemaking.

In August 2016, the USEPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase



two program would have applied to vehicles with model years 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types of sizes of buses and work trucks. The final standards were expected to lower CO₂ emissions by approximately 1.1 billion metric tons (MT), and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.

In August 2018, the USEPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new, less-stringent standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards that were previously in place, the 2018 proposal would increase U.S. fuel consumption by approximately 0.5 million barrels per day, and would impact the global climate by 3/1000th of 1°C by 2100. California and other states stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures, and committed to cooperating with other countries to implement global climate change initiatives.

On September 27, 2019, the USEPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 FR 51,310), which became effective November 26, 2019. The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission-vehicle mandates in California. On March 31, 2020, the USEPA and NHTSA issued the Part Two Rule, which sets CO₂ emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. On January 20, 2021, an Executive Order (EO) was issued on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, which includes review of the Part One Rule by April 2021 and review of the Part Two Rule by July 2021. In response to the Part One Rule, in December 2021, the U.S. Department of Transportation withdrew its portions of the "SAFE I" rule. As a result, states are now allowed to issue their own GHG emissions standards and zero-emissions vehicle mandates.¹² In addition, the Part Two Rule was adopted to revise the existing national GHG emission standards for passenger cars and light trucks through model year 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and will result in avoiding more than three billion tons of GHG emissions through 2050.¹³

Federal Regulations Related to Energy

The following are the federal regulations relevant to energy.

Energy Policy and Conservation Act

The Energy Policy and Conservation Act was originally enacted in 1975 with the intention of ensuring that all vehicles sold in the U.S. meet established fuel economy standards. Following congressional establishment of the original set of fuel economy standards the U.S. Department of Transportation was tasked with establishing additional on-road vehicle standards and making revisions to standards as necessary. Compliance with established standards is based on manufacturer fleet average fuel economy, which originally applied to both passenger cars and light trucks but did not apply to heavy-duty vehicles exceeding 8,500 pounds in gross vehicle

¹² National Highway Traffic Safety Administration. *In Removing Major Roadblock to State Action on Emissions Standards, U.S. Department of Transportation Advances Biden-Harris Administration's Climate and Jobs Goals*. Available at: <https://www.nhtsa.gov/press-releases/cape-preemption-final-rule>. Accessed February 2024.

¹³ U.S. Environmental Protection Agency. *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026*. Available at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions>. Accessed February 2024.



weight. The fuel economy program implemented under the Energy Policy and Conservation Act is known as the Corporate Average Fuel Economy (CAFE) Standards. Updates to the CAFE standards since original implementation have increased fuel economy requirements and begun regulation of medium- and heavy-duty vehicles.

Energy Policy Act of 2005

The Energy Policy Act of 2005 addressed energy production in the U.S. from various sources. In particular, the Energy Policy Act of 2005 included tax credits, loans, and grants for the implementation of energy systems that would reduce GHG emissions related to energy production.

State Regulations Related to Air Quality

The following discussion summarizes applicable State regulations related to air quality, organized by pollutant type. Only the most prominent and applicable California air quality-related legislation is included below; however, an exhaustive list and extensive details of California air quality legislation can be found at the CARB website (<http://www.arb.ca.gov/html/lawsregs.htm>).

Criteria Air Pollutants

The FCAA delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the CCAA of 1988, responding to the FCAA, and regulating emissions from motor vehicles and consumer products.

CARB has established CAAQS, which are generally more restrictive than the NAAQS. The CAAQS describe adverse conditions; that is, pollution levels must be below these standards before a basin can attain the standard. Air quality is considered “in attainment” if pollutant levels are continuously below the CAAQS and do not violate the standards more than once each year. The CAAQS for ozone, CO, SO₂ (one-hour and 24-hour), NO₂, PM₁₀, PM_{2.5}, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. The NAAQS and CAAQS are presented in Table 4.3-2.

Hazardous Air Pollutants/Toxic Air Contaminants

The State Air Toxics Program was established in 1983 under Assembly Bill (AB) 1807 (Tanner), and involved definition of a list of TACs. The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. The State list of TACs includes the federally-designated hazardous air pollutants. In 1987, the Legislature enacted the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) to address public concern over the release of TACs into the atmosphere. AB 2588 law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hot spots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over five years. TAC emissions from individual facilities are quantified and prioritized. “High-priority” facilities are required to perform a health risk



assessment, and, if specific thresholds are exceeded, the facility operator is required to communicate the results to the public in the form of notices and public meetings.

CARB Air Quality and Land Use Handbook

CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB Handbook) addresses the importance of considering health risk issues when siting sensitive land uses, including residential development, in the vicinity of intensive air pollutant emission sources including freeways or high-traffic roads, distribution centers, ports, petroleum refineries, chrome plating operations, dry cleaners, and gasoline dispensing facilities.¹⁴ The CARB Handbook draws upon studies evaluating the health effects of traffic traveling on major interstate highways in metropolitan California centers within Los Angeles (Interstate-405 and Interstate-710), the San Francisco Bay, and San Diego areas. The recommendations identified by CARB, including siting residential uses a minimum distance of 500 feet from freeways or other high-traffic roadways, are consistent with those adopted by the State of California for location of new schools. Specifically, the CARB Handbook recommends, "Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day".¹⁵

Importantly, the Introduction chapter of the CARB Handbook clarifies that the guidelines are strictly advisory, recognizing that: "[I]and use decisions are a local government responsibility. The Air Resources Board Handbook is advisory and these recommendations do not establish regulatory standards of any kind." CARB recognizes that there may be land use objectives as well as meteorological and other site-specific conditions that need to be considered by a governmental jurisdiction relative to the general recommended setbacks, specifically stating, "[t]hese recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues".¹⁶

Diesel Particulate Matter

In 2000, CARB approved a comprehensive diesel risk reduction plan to reduce diesel emissions, including DPM, from new and existing diesel-fueled vehicles and engines. The regulation was anticipated to result in an 80 percent decrease in statewide diesel health risk by 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. The aforementioned regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures (ATCMs) exist that reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

Heavy-Duty Diesel Truck and Bus Regulation

CARB adopted the final Heavy-Duty Truck and Bus Regulation, Title 13, Division 3, Chapter 1, Section 2025, on December 31, 2014, to reduce DPM and NO_x emissions from heavy-duty diesel vehicles. The rule requires nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an ATCM to limit idling of diesel-

¹⁴ California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.

¹⁵ *Ibid.*

¹⁶ *Ibid.*



fueled commercial vehicles on December 12, 2013. The rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than five minutes at any location (13 CCR 2485).

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person must not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. Section 41700 also applies to sources of objectionable odors.

Heavy-Duty Vehicle Idling Emission Reduction Program

On October 20, 2005, CARB approved a regulatory measure to reduce emissions of toxics and criteria pollutants by limiting idling of new and in-use sleeper berth equipped diesel trucks.¹⁷ The regulation established new engine and in-use truck requirements and emission performance requirements for technologies used as alternatives to idling the truck's main engine. For example, the regulation requires 2008 and newer model year heavy-duty diesel engines to be equipped with a non-programmable engine shutdown system that automatically shuts down the engine after five minutes of idling, or optionally meet a stringent NO_x emission standard. The regulation also requires operators of both in-state and out-of-state registered sleeper berth equipped trucks to manually shut down their engine when idling more than five minutes at any location within California. Emission producing alternative technologies such as diesel-fueled auxiliary power systems and fuel-fired heaters are also required to meet emission performance requirements that ensure emissions are not exceeding the emissions of a truck engine operating at idle.

In-Use Off-Road Diesel Vehicle Regulation

On July 26, 2007, CARB adopted a regulation to reduce DPM and NO_x emissions from in-use (existing), off-road, heavy-duty diesel vehicles in California.¹⁸ Such vehicles are used in construction, mining, and industrial operations. The regulation is designed to reduce harmful emissions from vehicles by subjecting fleet owners to retrofit or accelerated replacement/repower requirements, imposing idling limitations on owners, operators, renters, or lessees of off-road diesel vehicles. The idling limits require operators of applicable off-road vehicles (self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) to limit idling to less than five minutes. The idling requirements are specified in Title 13 of the CCR.

State Regulations Related to GHG Emissions

The statewide GHG emissions regulatory framework is summarized below. The following text describes EOs, legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues. The following discussion does not include an exhaustive list of applicable regulations; rather, only the most prominent and applicable California legislation related to GHG emissions and climate change is included below.

¹⁷ California Air Resources Board. *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*. October 24, 2013. Available at: <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling>. Accessed February 2024.

¹⁸ California Air Resources Board. *In-Use Off-Road Diesel Vehicle Regulation*. December 10, 2014. Available at: <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>. Accessed February 2024.



State Climate Change Targets

California has taken a number of actions to address climate change, including EOs, legislation, and CARB plans and requirements, which are summarized below.

Executive Order S-3-05

EO S-3-05 (June 2005) established California's GHG emissions reduction targets and laid out responsibilities among the State agencies for implementing the EO and for reporting on progress toward the targets. The EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

EO S-3-05 also directed the California Environmental Protection Agency (CalEPA) to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The Climate Action Team was formed, which subsequently issued reports from 2006 to 2010.

Assembly Bill 32

In furtherance of the goals established in EO S-3-05, the Legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive, multi-year program to limit California's GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the State's long-range climate objectives. AB 32 also required that the CARB prepare a "scoping plan" for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020. The CARB's Scoping Plan is described in further detail below.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40 percent below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80 percent below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achieving this goal, EO B-30-15 called for an update to the CARB's Climate Change Scoping Plan: A Framework for Change (Scoping Plan) to express the 2030 target in terms of million metric tons (MMT) CO₂e. The CARB's Scoping Plan is discussed in further detail below. The EO also called for State agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets.

Senate Bill 32 and Assembly Bill 197

Senate Bill (SB) 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, to provide ongoing oversight over implementation of the State's climate policies. AB 197 also added two members of the Legislature to the Board as non-voting members; requires CARB to make available and update (at least annually via the CARB's website) emissions data for GHGs, criteria air pollutants, and TACs from reporting



facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

CARB's Climate Change Scoping Plan

One specific requirement of AB 32 is for CARB to prepare a scoping plan for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561[a]), and to update the Scoping Plan at least once every five years. In 2008, CARB approved the first Scoping Plan. The Scoping Plan included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives. The key elements of the Scoping Plan include the following:

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
2. Achieving a statewide renewable energy mix of 33 percent;
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions;
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
5. Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS) (17 CCR, Section 95480 et seq.); and
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

The Scoping Plan also identified local governments as essential partners in achieving California's goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations and for community emissions to reduce GHGs by approximately 15 percent from 2008 levels by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. The First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) defined the State's GHG emission reduction priorities for the next five years and laid the groundwork to start the transition to the post-2020 goals set forth in EO S-3-05 and EO B-16-2012. The First Update concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuation of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050, including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the State's 1990 emissions level using more recent GWPs identified by the IPCC, from 427 MMT CO₂e to 431 MMT CO₂e.



In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40 percent below 1990 levels by 2030 to keep California on a trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80 percent below 1990 levels by 2050, as set forth in EO S-3-05. In summer 2016, the Legislature affirmed the importance of addressing climate change through passage of SB 32 (Pavley, Chapter 249, Statutes of 2016).

In December 2017, the Scoping Plan was once again updated. The 2017 Scoping Plan built upon the successful framework established in the initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies that would serve as the framework to achieve the 2030 GHG target as established by SB 32 and define the State's climate change priorities to 2030 and beyond. For local governments, the 2017 Scoping Plan replaced the initial Scoping Plan's 15 percent reduction goal with a recommendation to aim for a communitywide goal of no more than six MTCO₂e per capita by 2030, and no more than two MTCO₂e per capita by 2050, which are consistent with the State's long-term goals. The 2017 Scoping Plan recognized the benefits of local government GHG planning (e.g., through Climate Action Plans [CAPs]) and provided more information regarding tools to support those efforts. The 2017 Scoping Plan also recognized the CEQA streamlining provisions for project-level review where a legally adequate CAP exists.

When discussing project-level GHG emissions reduction actions and thresholds in the context of CEQA, the 2017 Scoping Plan stated that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development" for project-level CEQA analysis, but also recognized that such a standard may not be appropriate or feasible for every development project. The 2017 Scoping Plan further provided that "the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

The most recent update to the Scoping Plan, the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) was adopted by the CARB in December 2022.¹⁹ The 2022 Scoping Plan Update builds upon previous efforts to reduce GHG emissions and is designed to continue to shift the California economy away from dependence on fossil fuels. The 2022 Scoping Plan Update, the most comprehensive and far-reaching Scoping Plan developed to date, identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the Scoping Plan also includes discussion for the first time of the Natural and Working Lands (NWL) sectors as both sources of emissions and carbon sinks.

The 2022 Scoping Plan Update lays out a path to achieve targets for carbon neutrality and reduce GHG emissions by 85 percent below 1990 levels by 2045, as directed by AB 1279. The actions

¹⁹ California Air Resources Board. *2022 Scoping Plan for Achieving Carbon Neutrality*. November 16, 2022. Available at: <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>. Accessed December 2022.



and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on NWL to reduce emissions and sequester carbon, and the capture and storage of carbon.

CARB's Regulations for the Mandatory Reporting of GHG Emissions

CARB's Regulation for the Mandatory Reporting of GHG Emissions (17 CCR 95100–95157) incorporated by reference certain requirements that the USEPA promulgated in its Final Rule on Mandatory Reporting of GHGs (40 Code of Federal Regulations [CFR] Part 98). In general, entities subject to the Mandatory Reporting Regulation that emit more than 10,000 MTCO₂e per year are required to report annual GHGs through the California Electronic GHG Reporting Tool. Certain sectors, such as refineries and cement plants, are required to report regardless of emission levels. Entities that emit more than the 25,000 MTCO₂e per year threshold are required to have their GHG emission report verified by a CARB-accredited third party.

Senate Bill 1383

SB 1383 establishes specific targets for the reduction of short-lived climate pollutants (SLCPs) (40 percent below 2013 levels by 2030 for CH₄ and hydrofluorocarbons (HFCs), and 50 percent below 2013 levels by 2030 for anthropogenic black carbon), and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, CARB adopted its SLCP Reduction Strategy in March 2017. The SLCP Reduction Strategy establishes a framework for the statewide reduction of emissions of black carbon, CH₄, and fluorinated gases.

Executive Order B-55-18/AB 1279

EO B-55-18 (September 2018) establishes a statewide policy for California to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net-negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the State's GHG emissions. CARB intends to work with relevant State agencies to ensure that future scoping plan updates identify and recommend measures to achieve the carbon neutrality goal. On September 16, 2022, AB 1279, also known as the California Climate Crisis Act, codified the carbon neutrality goal established by EO B-55-18.

Mobile Sources

The following regulations relate to the control of GHG emissions from mobile sources. Mobile sources include both on-road vehicles and off-road equipment.

Assembly Bill 1493

AB 1493 (Pavley) (July 2002) was enacted in response to the transportation sector accounting for more than half of California's CO₂ emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the State board to be vehicles that are primarily used for non-commercial personal transportation in the State. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards would result in a reduction of approximately 22 percent of GHG emissions compared to the emissions from the 2002 fleet, and the mid-term (2013–2016) standards would result in a reduction of approximately 30 percent.



Senate Bill 375

SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, and to update those targets every eight years. SB 375 requires the State's 18 regional metropolitan planning organizations to prepare a sustainable communities strategy as part of their Regional Transportation Plans that will achieve the GHG reduction targets set by CARB. If a metropolitan planning organization is unable to devise a sustainable communities strategy to achieve the GHG reduction target, the metropolitan planning organization must prepare an alternative planning strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to California Government Code Section 65080(b)(2)(K), a sustainable communities strategy does not (1) regulate the use of land, (2) supersede the land use authority of cities and counties, or (3) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with the sustainable community strategy. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the State-mandated housing element process.

Advanced Clean Cars Program and Zero-Emissions Vehicle Program

The Advanced Clean Cars program (January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. By 2025, implementation of the rule is anticipated to reduce emissions of smog-forming pollution from cars by 75 percent compared to the average new car sold in 2015. To reduce GHG emissions, CARB, in conjunction with the USEPA and NHTSA, adopted GHG standards for model year 2017 to 2025 vehicles; the standards were estimated to reduce GHG emissions by 34 percent by 2025. The zero-emissions vehicle program acts as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of zero-emissions vehicles and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

Executive Order B-16-12

EO B-16-12 (March 2012) required that State entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. The order directed CARB, California Energy Commission (CEC), California Public Utilities Commission (CPUC), and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80 percent less than 1990 levels by 2050. EO B-16-12 did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare.



Assembly Bill 1236

AB 1236 (October 2015) (Chiu) required a city, county, or city and county to approve an application for the installation of electric-vehicle (EV) charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based on substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and a feasible method to satisfactorily mitigate or avoid the specific, adverse impact does not exist. The bill provided for appeal of that decision to the planning commission, as specified. AB 1236 required EV charging stations to meet specified standards. The bill required a city, county, or city and county with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for EV charging stations. The bill also required a city, county, or city and county with a population of less than 200,000 residents to adopt the ordinance by September 30, 2017.

Water

The following regulations relate to the conservation of water, which reduces GHG emissions related to electricity demands from the treatment and transportation of water.

Executive Order B-29-15

In response to a drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25 percent relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives subsequently became permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the State. In response to EO B-29-15, the California Department of Water Resources modified and adopted a revised version of the Model Water Efficient Landscape Ordinance (MWELO) that, among other changes, significantly increases the requirements for landscape water use efficiency, and broadens the applicability of the ordinance to include new development projects with smaller landscape areas.

Solid Waste

The following regulations relate to the generation of solid waste and means to reduce GHG emissions from solid waste produced within the State.

Assembly Bill 939 and Assembly Bill 341

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code [PRC] Sections 40000 et seq.), was passed because of the observed increase in waste stream and the decrease in landfill capacity.

AB 341 (Chapter 476, Statutes of 2011 [Chesbro]) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that the policy goal of the State is that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery to develop strategies to achieve the State's policy goal.

Other State Actions

The following State regulations are broadly related to GHG emissions.



Senate Bill 97

SB 97 (Dutton) (August 2007) directed the Governor’s Office of Planning and Research (OPR) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Governor’s OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project’s GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities. The advisory further recommended that the lead agency determine the significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The California Natural Resource Agency (CNRA) adopted the CEQA Guidelines amendments in December 2009, and the amended CEQA Guidelines became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis, or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply the lead agency’s own thresholds of significance or those developed by other agencies or experts. CNRA acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project’s GHG emissions.

With respect to GHG emissions, the CEQA Guidelines state that lead agencies should “make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions (14 CCR 15064.4[a]). The CEQA Guidelines note that an agency may identify emissions by either selecting a “model or methodology” to quantify the emissions or by relying on “qualitative analysis or other performance-based standards” (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Executive Order S-13-08

EO S-13-08 (November 2008) is intended to hasten California’s response to the impacts of global climate change, particularly sea-level rise. Therefore, the EO directs State agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009, and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014. To assess the State’s vulnerability, the report summarizes key climate change impacts to the State for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water. Issuance of the Safeguarding California: Implementation Action Plans followed in March 2016. In January 2018, the CNRA



released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that the State government should take to build climate change resiliency.

State Regulations Related to Energy

The primary State regulatory agencies governing energy consumption are the CEC and the CPUC.

The CEC, created by the Legislature in 1974, has seven major responsibilities: forecasting future energy needs; promoting energy efficiency and conservation by setting the State's appliance and building energy efficiency standards; supporting energy research that advances energy science and technology through research, development, and demonstration projects; developing renewable energy resources; advancing alternative and renewable transportation fuels and technologies; certifying thermal power plants 50 MW and larger; and planning for and directing State response to energy emergencies.²⁰

The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies. The CPUC is responsible for ensuring that customers have safe, reliable utility service and infrastructure at reasonable rates, regulating utility services, stimulating innovation, and promoting competitive markets.²¹

The State has adopted various regulations aimed at reducing energy consumption, increasing energy efficiency, and mandating sourcing requirements for electricity production. The following regulations are applicable to the proposed project.

Building Energy

The following regulations relate to energy efficiency and energy use reductions in the built environment.

Title 24, Part 6

Title 24 of the CCR, which is known as the California Building Standards Code (CBSC), was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed periodically, and revised, if necessary, by the Building Standards Commission and CEC (PRC Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (PRC Section 25402). The regulations are scrutinized and analyzed for technological and economic feasibility (PRC Section 25402[d]) and cost effectiveness (PRC Sections 25402[b][2] and [b][3]). As a result, the standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2022 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2023. Compliance with the 2022 Title 24 Building Energy

²⁰ California Energy Commission. *About the California Energy Commission*. Available at: <http://www.energy.ca.gov/about>. Accessed February 2024.

²¹ California Public Utilities Commission. *California Public Utilities Commission*. Available at: <https://www.cpuc.ca.gov/about-cpuc>. Accessed February 2024.



Efficiency Standards will reduce energy use and associated GHG emissions compared to structures built in compliance with the previous 2019 Title 24 standards.

Title 24, Part 11

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen, and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, industrial, low-rise residential and State-owned buildings and schools and hospitals. The original CALGreen standards have been updated several times. The CALGreen 2022 standards, which are the current standards, improved upon the 2019 CALGreen standards, and went into effect on January 1, 2023. The 2022 CALGreen Code focuses on four key areas in newly constructed homes and businesses:²²

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking and EV charging options whenever they choose to adopt those technologies.
- Expanding solar PV system and battery storage standards to make clean energy available onsite and complement the state's progress toward a 100 percent clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

The CALGreen standards also include voluntary efficiency measures that are provided at two tiers and implemented at the discretion of local agencies and applicants. According to Section A4.602 of Appendix A4 of the CALGreen Code, CALGreen's Tier 1 standards call for a 15 percent improvement in energy requirements, stricter water conservation, 65 percent diversion of construction and demolition waste, 10 percent recycled content in building materials, 20 percent permeable paving, 20 percent cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30 percent improvement in energy requirements, stricter water conservation, 80 percent diversion of construction and demolition waste, 15 percent recycled content in building materials, 30 percent permeable paving, 25 percent cement reduction, and cool/solar-reflective roofs.

Title 20

Title 20 of the CCR requires manufacturers of appliances to meet State and federal standards for energy and water efficiency. The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies;

²² California Energy Commission. *Energy Commission Adopts Updated Building Standards to Improve Efficiency, Reduce Emissions From Homes and Businesses*. Available at: <https://www.energy.ca.gov/news/2021-08/energy-commission-adopts-updated-building-standards-improve-efficiency-reduce-0>. Accessed February 2024.



televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and State standards for federally regulated appliances, State standards for federally regulated appliances, and State standards for non-federally regulated appliances.

Senate Bill 1

SB 1 (Murray) (August 2006) established a \$3 billion rebate program to support the goal of the State to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the PRC, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for PV systems to meet minimum energy efficiency levels and performance requirements. Section 25780 established that it is a goal of the State to establish a self-sufficient solar industry. The goals included establishing solar energy systems as a viable mainstream option for homes and businesses within 10 years of adoption, and placing solar energy systems on 50 percent of new homes within 13 years of adoption. SB 1, also termed “Go Solar California,” was previously titled “Million Solar Roofs.”

Assembly Bill 1109

Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting to reduce electricity consumption by 50 percent for indoor residential lighting and by 25 percent for indoor commercial lighting.

Climate Change Scoping Plan

Expanding and strengthening existing energy efficiency programs as well as building and appliance standards is the key element of the Scoping Plan, as introduced above, related to building energy.

Transportation/Fuel Energy

The following regulations relate to fuel efficiency and energy use reductions in the transportation and motorized vehicle sector.

Assembly Bill 1493

In 2002 California adopted AB 1493, also known as the Pavley I standards, which required new passenger vehicles with model years 2009 to 2016 to meet more stringent fuel efficiency standards. Additional laws have extended these rules to cover vehicles from future model years.

Executive Order S-1-07

EO S-1-07, otherwise known as the LCFS, was adopted in 2009 and requires transportation fuels such as gasoline and diesel sold within the state to be less carbon intensive. These policies reduce emissions from on-road transportation and off-road equipment use in the City of Sacramento.

Executive Order B-16-12

EO B-16-12 (March 2012) required that State entities under the governor’s direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. The order directed CARB, CEC, CPUC, and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve



goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80 percent less than 1990 levels by 2050. EO B-16-12 did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare.

Assembly Bill 1346

AB 1346 (October 2021) prohibits the sale of new non-electric small off-road engines. Small off-road engines, which are used primarily in lawn and garden equipment, emit high levels of air pollutants and, in 2020, California daily criteria pollutant emissions from small off-road engines were higher than emissions from light-duty passenger cars. Thus, by January 1, 2024, regulations shall prohibit engine exhaust and evaporative emissions from new small off-road engines.

Senate Bill 500

SB 500 (September 2021) requires that, beginning January 1, 2030, to the extent allowed by federal law, any autonomous vehicle that is model year 2031 or later, has a gross vehicle weight rating of less than 8,501 pounds, and is equipped with Level 3, 4, or 5 automation (as defined by the International Society of Automotive Engineers) to be a zero-emission vehicle to be operated on California public roads.

Climate Change Scoping Plan

The key elements of the Scoping Plan, as introduced above, related to transportation energy include the following:

1. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets; and
2. Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the LCFS (17 CCR, Section 95480 et seq.).

Renewable Energy and Energy Procurement

The following regulation relates to the source of electricity provided to consumers within the State, as well as standards related to the generation of electricity within the State.

Renewable Portfolio Standard, Senate Bill 350, and Senate Bill 100

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, and expanded in 2011 under SB 2, California's Renewable Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020.

Since the inception of the RPS program, the program has been extended and enhanced multiple times. In 2015, SB 350 extended the State's RPS program by requiring that publicly owned utilities procure 50 percent of their electricity from renewable energy sources by 2030. The requirements of SB 350 were expanded and intensified in 2018 through the adoption of SB 100, which mandated that all electricity generated within the State by publicly owned utilities be generated through carbon-free sources by 2045. In addition, SB 100 increased the previous renewable energy requirement for the year 2030 by 10 percent; thus, requiring that 60 percent of electricity generated by publicly owned utilities originate from renewable sources by the year 2030.



Local Regulations

The most prominent local regulations related to air quality, GHG emissions, and energy are established by the SMAQMD and the City of Sacramento General Plan, and are discussed in further detail below.

Sacramento Metropolitan Air Quality Management District

The SMAQMD regulates many sources of pollutants in the ambient air as well as GHG emissions, and is responsible for implementing certain programs and regulations for controlling air pollutant and GHG emissions to improve air quality in order to attain federal and State AAQS and reduce GHG emissions in compliance with State goals.

Air Quality Attainment Plan

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

The Ozone Attainment Plan, and subsequent updates, demonstrate how existing and new control strategies would provide the necessary future emission reductions to meet the FCAA requirements, including the NAAQS. It should be noted that in addition to strengthening the 8-hour ozone NAAQS, the USEPA also strengthened the secondary 8-hour ozone NAAQS, making the secondary standard identical to the primary standard. The SVAB remains classified as a severe nonattainment area for ozone with an attainment deadline of 2027. On October 26, 2015, the USEPA released a final implementation rule for the revised NAAQS for ozone to address the requirements for reasonable further progress, modeling and attainment demonstrations, and reasonably available control measures (RACT) and reasonably available control technology (RACT). The USEPA published designations for areas in attainment/unclassifiable for the 2015 ozone standards. The USEPA identified the entire Sacramento County as nonattainment for the 2015 ozone standards.²³

City of Sacramento 2040 General Plan

The following goals and policies related to air quality are from the City of Sacramento 2040 General Plan:

²³ U.S. Environmental Protection Agency. *Nonattainment and Unclassifiable Area Designations for the 2015 Ozone Standards*. April 30, 2018.



Environmental Resources and Constraints Element

Goal ERC-4 Collaborative action to address air pollution.

- Policy ERC-4.2 **Air Quality Awareness.** The City shall cooperate with the Sacramento Metropolitan Air Quality Management District (SMAQMD), Sacramento Area Council of Governments (SACOG), Sacramento Municipal Utility District (SMUD), and other groups to promote public access to air quality monitoring data and awareness about impacts of indoor and outdoor air quality on health and protective strategies.
- Policy ERC-4.3 **Project Design.** The City shall promote the incorporation of new technologies, materials, and design and construction techniques in private development projects that minimize air pollution, noise, excess heat, and other forms of pollution and its impacts.
- Policy ERC-4.4 **Sensitive Uses.** The City shall consult, as appropriate, with the Sacramento Metropolitan Air Quality Management District (SMAQMD) in evaluating exposure of sensitive receptors to toxic air contaminants, and will impose conditions, as appropriate, on projects to protect public health and safety.
- Policy ERC-4.5 **Construction Emissions.** The City shall ensure that construction and grading activities minimize short-term impacts to air quality by employing appropriate measures and best practices. Refer to Basic Construction Emissions Control Practices (BMPs) recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD).
- Policy ERC-4.6 **Gas-Powered Landscaping Equipment.** The City shall encourage alternatives to gas-powered landscaping equipment that would reduce exposure to air and sound pollution caused by the use of these machines.
- Policy ERC-4.7 **Operational Emissions.** The City shall require development projects that exceed Sacramento Metropolitan Air Quality Management District (SMAQMD) reactive organic gas (ROG) and nitrogen oxide (NOX) operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project.

Environmental Justice Element

Goal EJ-1 Clean air, water, and soil with no segment of the community disproportionately burdened by environmental conditions.

- Policy EJ-1.4 **Impact Assessment.** The City shall continue to use the Sacramento Metropolitan Air Quality Management District



(SMAQMD) modeling tools and guidance documents, as appropriate, to identify and mitigate air quality impacts from proposed development projects.

Youth, Parks, Recreation, and Open Space

Goal YPRO-1 An integrated system of parks, open space areas, shared-use paths, and recreational facilities that are welcoming, well-maintained, safe, and accessible to all the diverse communities of Sacramento.

Policy YPRO-1.19 **Sustainable Design.** The City shall design and construct parks, public spaces, and recreational facilities for flexible use, energy/water efficiency, reduced greenhouse gas emissions and air pollution, adaptability for long-term use, and ease and cost of maintenance.

Policy YPRO-1.20 **Climate-Resilient Design.** The City shall ensure that the design of parks and open spaces balance climate-adaptive design, such as resilient landscaping in place of impervious surfaces, climate-adaptive tree canopy, shade structures, drinking fountains, and cooling amenities, such as water spray areas, that provide respite from higher temperatures to reduce urban heat islands and overexposure to heat.

City of Sacramento Climate Action and Adaptation Plan

On February 27, 2024, the City adopted the 2040 General Plan and Climate Action & Adaptation Plan (CAAP). The CAAP builds off the City's previously adopted (2012) Climate Action Plan (CAP), the City's Climate Emergency Declaration of 2019, and incorporates recommendations from the Mayors' Commission on Climate Change. The CAAP sets new targets for the City which exceed the GHG reduction requirements established by SB 32, and identifies key strategies and actions that form the foundation of Sacramento's goal of achieving carbon neutrality by 2045, consistent with the goals of the 2022 Scoping Plan. The City's CAAP serves as a Qualified GHG Reduction Strategy under Section 15183.5 of the CEQA Guidelines, simplifying development review for new projects that are consistent with the CAAP. The Sacramento CAAP includes GHG emission reduction targets, strategies, and implementation measures developed to help the City reach the emission reduction targets. Reduction strategies address GHG emissions associated with the built environment (energy and electrification), mobility, waste, water and wastewater, and carbon sequestration.

4.3.4 IMPACTS AND MITIGATION MEASURES

The standards of significance and methodology used to analyze and determine the proposed project's potential project-specific impacts related to air quality and GHG emissions are described below. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Based on the recommendations of SMAQMD, and consistent with Appendix G of the CEQA Guidelines, the effects of a project are evaluated to determine if they would result in a significant adverse impact on the environment. For the purposes of this EIR, an impact is considered significant if the proposed project would:



- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations (including localized CO concentrations and TAC emissions);
- Result in other emissions (such as those leading to odors) affecting a substantial number of people;
- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources;
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency;
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Criteria Pollutant Emissions and TAC Emissions

In order to evaluate criteria air pollutant emissions from development projects, SMAQMD has established significance thresholds for emissions of NO_x, ROG, PM₁₀, and PM_{2.5}. The significance thresholds serve as air quality standards in the evaluation of air quality impacts associated with proposed development projects. Thus, if the proposed project's emissions exceed the SMAQMD thresholds, the project could have a significant effect on regional air quality and attainment of federal and State AAQS. The SMAQMD's recommended thresholds of significance are listed in Table 4.3-6.

The City of Sacramento, as the CEQA Lead Agency for the proposed project, has formally adopted the SMAQMD's thresholds of significance. Therefore, if the proposed project's emissions exceed the pollutant thresholds presented in Table 4.3-6, the project could have a significant effect on air quality, the attainment of federal and State AAQS, and could conflict with or obstruct implementation of the applicable air quality plan.

With regard to other cumulative emissions, such as the cumulative emissions of criteria air pollutants, the SMAQMD directs lead agencies to use the region's existing attainment plans as a basis for analysis of cumulative emissions. If a project would interfere with an adopted attainment plan, the project would inhibit the future attainment of AAQS, and thus result in a significant incremental contribution to cumulative emissions. As discussed throughout this document, the SMAQMD's recommended thresholds of significance for ozone precursors and PM₁₀ are based on attainment plans for the region. Thus, SMAQMD concluded that if a project's ozone precursor and PM₁₀ emissions would be less than the associated thresholds, the project would not be expected to conflict with any relevant attainment plans, and would not result in a cumulatively considerable contribution to a significant cumulative impact. As a result, the operational phase cumulative-level emissions thresholds established by SMAQMD are identical to the project-level operational emissions thresholds; the operational/cumulative thresholds for criteria pollutants are presented in Table 4.3-6.

For TAC emissions, if a project would introduce a new source of TAC or a new sensitive receptor near an existing source of TAC that would not meet the CARB's minimum recommended setback, a detailed health risk assessment may be required. To assess the potential impacts of TACs, the



SMAQMD maintains thresholds of significance for the review of local community risk and hazard impacts.

| Table 4.3-6 SMAQMD Thresholds of Significance | | |
|---|--|--|
| Pollutant | Construction Threshold | Operational Threshold |
| NO _x | 85 lbs/day | 65 lbs/day |
| ROG | - ¹ | 65 lbs/day |
| PM ₁₀ | 80 lbs/day and 14.6 tons/yr ² | 80 lbs/day and 14.6 tons/yr ³ |
| PM _{2.5} | 82 lbs/day and 15 tons/yr ² | 82 lbs/day and 15 tons/yr ³ |
| ¹ The application of architectural coatings is typically the largest source of ROG emissions during construction activity. SMAQMD addresses construction-related emissions of ROG through the implementation of Rule 442, which regulates ROG emissions from architectural coatings. Therefore, SMAQMD has not adopted a threshold for construction-related ROG emissions. ² The identified construction thresholds of significance for PM ₁₀ and PM _{2.5} are only applicable when all feasible construction Best Management Practices (BMPs) are applied. The SMAQMD's construction BMPs are also known as Basic Construction Emission Control Practices. (SMAQMD, <i>Basic Construction Emission Control Practices (Best Management Practices)</i> , July 2019) ³ The identified operational thresholds of significance for PM ₁₀ and PM _{2.5} are only applicable when all feasible operational BMPs and Best Available Control Technologies (BACTs) are applied. The implementation of BACTs apply only to stationary source operational emissions. (SMAQMD, <i>Operational Best Management Practices for PM from Land Use Development Projects</i> , October 2020) | | |
| Source: SMAQMD Thresholds of Significance Table, April 2020. | | |

The thresholds are designed to assess the impact of new sources of TACs on existing sensitive receptors. Based on the SMAQMD thresholds, the proposed project would result in a significant impact related to TACs if nearby sensitive receptors would experience an increased cancer risk of greater than or equal to 10 in one million people, or experience a chronic or acute hazard index of greater than or equal to 1.0.²⁴ Neither SMAQMD nor the City have established quantitative thresholds of significance for construction-related TAC emissions

GHG Emissions

Nearly all development projects in the region have the potential to generate air pollutants that may increase global climate change. SMAQMD has adopted thresholds of significance for GHG emissions during construction and operations of projects. This GHG analysis has been prepared to show compliance with SMAQMD's GHG thresholds of significance.

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

For evaluating operational GHG emissions, SMAQMD has prepared a two-tiered framework of analysis for new projects. All development projects are required to implement Tier 1 measures (BMP 1 and 2). If operations of the proposed project would exceed 1,100 MTCO₂e/yr after implementation of the Tier 1 measures, then the project is required to implement Tier 2 measures (BMP 3). The Tier 1 and Tier 2 requirements are explained in further detail below.

²⁴ Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment in Sacramento County: Toxic Air Contaminants*. April 2020.



Tier 1

All projects within SMAQMD's jurisdiction would be required to comply with the Best Management Practices (BMPs) included in Tier 1. The proposed Tier 1 BMPs are as follows:

- **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, except all EV Capable spaces shall instead be EV Ready.

If a project would not comply with both of the foregoing BMPs, the project would be required to include features that would achieve an equivalent level of GHG emissions reductions. For instance, a project that includes natural gas infrastructure may include pre-wiring to allow for the future retrofit of all natural gas appliances with all-electric appliances. After implementation of BMPs 1 and 2, if a project's operational emissions would be at or below 1,100 MTCO₂e/yr, the operational emissions would be considered less than significant. Projects that would still result in emissions in excess of 1,100 MTCO₂e/yr after implementation of BMPs 1 and 2 are subject to review under Tier 2 of SMAQMD's thresholds.

Furthermore, projects that are below the Governor's OPR's *de minimis* vehicle miles travelled (VMT) criteria, and/or projects that emit less than 1,100 MTCO₂e/yr prior to implementation of BMP 1 and BMP 2 would be considered sufficiently small to screen out of further requirements, and would be assumed to result in a less-than-significant impact related to GHG emissions and climate change. The following types of projects would be considered to be below the OPR's *de minimis* VMT criteria:

- Small projects that generate or attract fewer than 110 trips per day;
- Residential and office projects in areas with low VMT (currently below threshold VMT) that incorporate similar features (i.e., density, mix of uses, transit accessibility), including affordable housing infill development; or
- Residential, retail, office, or mixed-use projects within 0.5-mile walking distance of an existing major transit stop or existing stop along a high-quality transit corridor, unless the primary use of the site is auto-oriented (e.g., car dealership, car wash, gas station).

It is noted, however, that all projects within the jurisdiction of SMAQMD are required to implement the Tier 1 measures, even if the project qualifies for screening using the OPR's *de minimis* VMT criteria.

Tier 2

The second tier of SMAQMD's thresholds includes the following BMP:

- **BMP 3:** Residential projects shall achieve a 15 percent reduction in VMT per resident, and office projects should achieve a 15 percent reduction in VMT per worker compared to existing average VMT per capita for the county, or for the city if a more local SB 743 target has been established. VMT reductions can be achieved by many strategies, such as:
 - Locate in an area that already has low VMT due to location, transit service, etc.;
 - Adopt CAPCOA measures;
 - Adopt measures noted in Sacramento's CAAP checklist;
 - Join a Transportation Management Association;



- Incorporate traffic calming measures;
- Incorporate pedestrian facilities and connections to public transportation; and/or
- Promote electric bicycle or other micro-mobility options.

Pursuant to the Tier 2 requirement, if a project can successfully achieve a 15 percent reduction in VMT or meet the requirements of an established local SB 743 target, then impacts associated with operational GHG emissions are considered less than significant.

If a project cannot incorporate any of the foregoing BMPs, other reductions or purchasing and retiring of GHG/carbon offsets can be used as an alternative method of compliance. Given that the developer demonstrates that the alternative method(s) of compliance would achieve the same reductions as those required by BMPs 1 through 3, the project can be considered to result in a less-than-significant impact related to operational GHG emissions.

In accordance with CARB and SMAQMD recommendations, the City of Sacramento uses the currently adopted SMAQMD GHG thresholds of significance, as presented above, as well as compliance with the City's CAAP. Therefore, if the proposed project would result in construction GHG emissions in excess of 1,100 MTCO₂e/yr, and would not comply with the measures included in the CAAP, construction of the proposed project would be considered to result in a cumulatively considerable contribution to global climate change. In addition, if the proposed project would not achieve the SMAQMD's Tier 1 GHG requirements (BMPs 1 and 2) and, if applicable, Tier 2 GHG requirements (BMP 3), and would not comply with the measures included in the CAAP, operations of the project would be considered to result in a cumulatively considerable contribution to global climate change.

Energy

Quantitative thresholds for the analysis of potential impacts related to energy consumption have not been adopted by any local, regional, or statewide entities. Consequently, potential impacts of the project related to energy will be determined based on whether the project would result in wasteful, inefficient, or unnecessary use of energy. In addition, the potential for the project to conflict with or obstruct a state or local plan for renewable energy generation or energy efficiency will be considered. The analysis of energy consumption will include consideration of energy demand during both project construction and operations.

Method of Analysis

The analysis protocol and guidance provided by the SMAQMD's *CEQA Guide*, including screening criteria and pollutant thresholds of significance, was used to analyze the proposed project's air quality impacts.

Construction Emissions

The proposed project's short-term construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 software, which is a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions from land use projects. The model applies inherent default values for various land uses, including trip generation rates based on the Institute of Transportation Engineers (ITE) Manual, vehicle mix, trip length, average speed, etc. Where project-specific information is available, such information should be applied in the model. Construction emissions were modeled under two scenarios: the Proposed Project Scenario (i.e.,



development of the industrial park) and the Full Buildout of the Annexation Area Scenario (i.e., development of the industrial park and nonparticipating parcels).

The construction modeling for the Proposed Project Scenario assumes the following based on applicant-provided project-specific data:

- Construction would begin in the year 2023;²⁵
- Construction would occur over an approximately six-year period; and
- Approximately 304,000 cubic yards of soil would be imported during grading.

The construction modeling for the Full Buildout of the Annexation Area Scenario assumes the following based on applicant-provided project-specific data:

- Construction would begin in the year 2023;
- Construction would occur over an approximately ten-year period; and
- Approximately 304,000 cubic yards of soil would be imported during grading.

In addition, RoadMod was used to model construction of the longest, and, therefore, worst-case off-site sewer force main (Option 2), as described in Chapter 3, Project Description, of this EIR. RoadMod requires the user to input information related to the area of disturbance and the length of time a project would occur. Construction of the proposed off-site force main was assumed to begin in 2023. The force main was assumed to be approximately 2.32 miles long and 48-inches wide, and was assumed to be constructed over a one-month period.

The results of construction emissions estimations were compared to the standards of significance discussed above in order to determine the associated level of impact. All CalEEMod modeling results are included in Appendix C to this EIR.

Operational Emissions and Operational Energy Use

The proposed project's operational emissions were estimated using CalEEMod, and were modeled for both the Proposed Project Scenario and Full Buildout of the Annexation Area Scenario. Based on project-specific information provided by the project applicant, the proposed project is anticipated to be fully operational by 2029 for the Proposed Project Scenario and 2033 for the Full Buildout of the Annexation Area Scenario. The modeling performed for the proposed project included compliance with SMAQMD rules and regulations as well as with the California Building Energy Efficiency Standards Code, which is part of the CBSC. The proposed project's compliance with such would be verified as part of the City's building approval review process. In addition, DKS provided project-specific trip generation rates and VMT data, which were applied to the project modeling for both scenarios. In addition, the project was assumed to comply with the MWELo under both project scenarios. Finally, the modeling for the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario assumed that diesel forklifts would operate on the project site during project operations.

It should also be noted that emissions associated with heavy-duty trucks travelling to and from the project site were calculated off-model using project-specific trip generation rates provided by

²⁵ It is noted that when the air quality analysis was conducted, project construction was anticipated to commence in 2023. While this is no longer the case, the analysis conducted for this EIR is conservative because construction fleets and electricity generation are becoming more efficient over time due to state regulations; thus, modeling construction at an earlier start date provides a more conservative analysis.



DKS, trip length data provided by Fehr and Peers for the Metro Air Park Project located just north of the project site, and vehicle emission factors from the CARB's mobile source emissions inventory (EMFAC2021) model. Consistent with the Travel Behavior Memorandum prepared by Fehr and Peers for the Metro Air Park Project, an average length of 44.80 miles was assumed for heavy truck trips.²⁶ EMFAC2021 was used to calculate all mobile-sourced emissions associated with heavy-duty vehicles.

The estimated emissions from CalEEMod and EMFAC2021 were added together to represent total project emissions, and were compared to the standards of significance discussed above in order to determine the associated level of impact. All CalEEMod results and EMFAC2021 calculations are included in Appendix C to this EIR.

Operational Health Risk Assessment

In order to assess the health risk impacts of DPM emissions from heavy-duty trucks travelling to and from the project site on nearby sensitive receptors, first, the number of estimated diesel-fueled vehicles associated with the proposed project was determined using truck volumes provided by DKS. Next, the rate of DPM emissions for heavy-duty trucks travelling at the speed limit of the local roadway segments was obtained through the CARB's EMISSION FACTORS (EMFAC2021 v1.0.2) database.²⁷ EMFAC provides the rate of PM_{2.5} emissions, in grams per mile, for each vehicle category. By applying the foregoing data, the total grams of DPM that would be emitted by diesel-fueled vehicles traveling along the roadway segments closest to the project site was calculated. It should be noted that DPM is considered a subset of PM_{2.5} emissions. Thus, the estimated concentration of PM_{2.5} was used as a conservative proxy to represent emissions of DPM.

DPM concentrations resulting from project implementation were estimated using the American Meteorological Society/Environmental Protection Agency (AMS/EPA) Regulatory Model (AERMOD). The associated cancer risk and non-cancer hazard index were calculated using the CARB's Hotspot Analysis Reporting Program Version 2 (HARP 2) Risk Assessment Standalone Tool (RAST), which calculates the cancer and non-cancer health impacts using the risk assessment guidelines of the 2015 OEHHA Guidance Manual for Preparation of Health Risk Assessments.²⁸ The modeling was performed in accordance with the USEPA's User's Guide for the AERMOD²⁹ and the 2015 OEHHA Guidance Manual.

Although pollutant concentrations at all nearby receptors were estimated, for the purpose of determining potential health risks, only the highest estimated pollutant concentrations were used in calculating cancer risk and hazard indices. The receptor experiencing the highest estimated pollutant concentrations was considered to be the maximally exposed receptor, and would experience the highest potential health risks. Health risks to all other receptors would be lower than the health risks to the maximally exposed receptor, because all other receptors would be exposed to lower concentrations of heavy-duty truck-related pollutants as compared to the maximally exposed receptor.

²⁶ Fehr & Peers. *Metro Air Park Travel Behavior Data*. February 18, 2022.

²⁷ California Air Resources Board. *EMFAC Emissions Inventory*. Available at <https://arb.ca.gov/emfac/emissions-inventory/84f774a613b49d07f7fe9d750d9d00c86d945fb5>. Accessed February 2024.

²⁸ Office of Environmental Health Hazard Assessment. *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments* [pg. 8-18]. February 2015.

²⁹ U.S. Environmental Protection Agency. *User's Guide for the AMS/EPA Regulatory Model (AERMOD)*. December 2016.



Additionally, considering that both schools and residences exist in proximity to the area of disturbance, the estimation of health risks conservatively assumed that nearby receptors would be continuously exposed to pollutants from heavy-duty trucks at the maximum estimated concentrations. This assumption would represent a scenario whereby a resident living nearby also attends one of the nearby schools and is therefore exposed to pollutants both at home and at school. In practice, concentrations of pollutants at nearby schools would be much less than the concentration of pollutants at the maximally exposed receptor location. Due to the difference in pollutant concentrations at the maximally exposed receptor location and nearby schools, a single receptor would not be anticipated to be continuously exposed to the maximum level of pollutant concentrations both at home and at school. Nevertheless, by using the maximum estimated concentrations and assuming continuous exposure to pollutants, the estimated health risks presented below are considered a worst-case estimate of potential health risks, and actual health risks to receptors in the project area would be lower than the levels presented within this analysis.

It should be noted that due to the distance from the nearest proposed Highway Commercial Planned Unit Development (HC-PUD) zone to the Paso Verde K-8 School (approximately 3,500 feet), health risk impacts associated with operation of the potential fueling station were not evaluated as part of this EIR, as potential impacts are not anticipated to occur.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified above.

4.3-1 Conflict with or obstruct implementation of the applicable air quality plan during project construction. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

During construction of the project, various types of equipment and vehicles would temporarily operate on the project site and in off-site improvement areas. Construction-related emissions would be generated from construction equipment, vegetation clearing and earth movement activities, construction workers' commute, and construction material hauling for the entire construction period. The aforementioned activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants. Project construction activities also represent sources of fugitive dust, which includes PM emissions. As construction of the proposed project would generate emissions of criteria air pollutants, including ROG, NO_x, and PM₁₀, intermittently within the site and in the vicinity of the site, until all construction has been completed, construction is a potential concern, as the proposed project is located in a nonattainment area for ozone and PM.

It should be noted that construction activity related to implementation of the proposed project is required to comply with all SMAQMD rules and regulations. The applicable rules and regulations would include, but would not be limited to, the following:

- Rule 403 related to Fugitive Dust;
- Rule 404 Related to Particulate Matter;
- Rule 407 related to open burning;
- Rule 442 related to Architectural Coatings;



- Rule 453 related to Cutback and Emulsified Asphalt Paving Materials; and
- Rule 460 related to Adhesives and Sealants.

In addition, the control of fugitive dust during construction is required by SMAQMD Rule 403, and enforced by SMAQMD staff. The City would enforce compliance with Rule 403 through implementation of Mitigation Measure 4.3-1(a), below.

Using CalEEMod, the maximum construction-related emissions were estimated for development of both the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario. Table 4.3-7 below presents the estimated construction-related emissions of ROG, NO_x, PM₁₀, and PM_{2.5} associated with the proposed project in comparison with the SMAQMD thresholds of significance as described above for both project scenarios.

| Table 4.3-7 Maximum Unmitigated Construction-Related Emissions | | | |
|---|-----------------------------------|---------------------------------|--------------------|
| Pollutant | Project Emissions | Construction Threshold | Exceeds Threshold? |
| Proposed Project | | | |
| NO _x | 89.34 lbs/day | 85 lbs/day | YES |
| ROG | 63.65 lbs/day | - | NO |
| PM ₁₀ | 67.97 lbs/day and 4.58 tons/yr | 80 lbs/day and 14.6 tons/yr* | NO |
| PM _{2.5} | 19.17 lbs/day and 1.31 tons/yr | 82 lbs/day and 15 tons/yr* | NO |
| Full Buildout of the Annexation Area | | | |
| NO _x | 100.2 lbs/day | 85 lbs/day | YES |
| ROG | 51.28 lbs/day | - | NO |
| PM ₁₀ | 75.17 lbs/day and 5.49 tons/yr | 80 lbs/day and 14.6 tons/yr* | NO |
| PM _{2.5} | 19.5 lbs/day and 1.56 tons/yr | 82 lbs/day and 15 tons/yr* | NO |
| * The above thresholds for PM only apply when all feasible BACT/BMPs are applied. If all feasible BACT/BMPs are not applied, then the applicable threshold of significance for PM is 0. | | | |
| Source: CalEEMod, June 2023. | | | |

Industrial Park and Off-Site Improvement Area (Proposed Project Scenario)

As shown in Table 4.3-7, construction activities associated with the Proposed Project Scenario would result in emissions of ROG, PM₁₀, and PM_{2.5} below the applicable SMAQMD thresholds of significance. However, emissions of NO_x would be above the applicable SMAQMD threshold of significance. Therefore, construction activities associated with development of the proposed project could substantially contribute to the SVAB’s non-attainment status for ozone. Accordingly, construction of the proposed project could violate an air quality standard or contribute to an existing or projected air quality violation, and a significant impact could occur associated with construction.



Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area (Full Buildout of the Annexation Area Scenario)

As shown in Table 4.3-7, construction activities associated with the Full Buildout of the Annexation Area Scenario would result in emissions of ROG, PM₁₀, and PM_{2.5} below the applicable SMAQMD thresholds of significance. However, emissions of NO_x would be above the applicable SMAQMD threshold of significance. Therefore, construction activities associated with full buildout of the annexation area could substantially contribute to the SVAB's non-attainment status for ozone. Accordingly, construction of the proposed project, including future development of the non-participating parcels, could violate an air quality standard or contribute to an existing or projected air quality violation, and a significant impact could occur associated with construction.

Conclusion

Because the proposed project would result in construction-related NO_x emissions in excess of SMAQMD's thresholds of significance, the proposed project would be considered to conflict with or obstruct the implementation of applicable air quality plans during construction. Therefore, the impact would be considered **significant**.

Mitigation Measure(s)

Implementation of Mitigation Measure 4.3-1(a) would ensure compliance with SMAQMD Rule 403. In addition, implementation of Mitigation Measure 4.3-1(b) would require the use of a combination of engine Tier 3 or Tier 4 off-road construction equipment, or hybrid, electric, or alternatively fueled equipment (or any combination of the above), during construction of the proposed project, including the industrial park, nonparticipating parcels, and off-site force main, to reduce the project's construction-related NO_x emissions to below the applicable SMAQMD threshold of significance. For example, the emissions presented in Table 4.3-8 assume the use of all Tier 4 final equipment. As shown in the table, use of all Tier 4 final equipment would reduce NO_x emissions to below the applicable threshold of significance construction of the project components. Therefore, implementation of Mitigation Measures 4.3-1(a) and 4.3-1(b) would reduce the above potential construction-related impact to a *less-than-significant* level.

4.3-1(a) *The following SMAQMD's Basic Construction Emissions Control Practices (BMPs) for dust control shall be included through a notation on all project grading plans prior to the issuance of grading permits, to the satisfaction of the City of Sacramento Community Development Department.*

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



- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [CCR Title 13, Sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site;
- Provide current certificate(s) of compliance for CARB’s In-Use Off-Road Diesel-Fueled Fleets Regulation [CCR Title 13, Sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.; and
- Maintain all construction equipment in proper working condition according to manufacturer’s specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

| Table 4.3-8 Maximum Mitigated Construction-Related Emissions | | | |
|---|--------------------------------|-------------------------------|---------------------------|
| Pollutant | Project Emissions | Construction Threshold | Exceeds Threshold? |
| Proposed Project | | | |
| NO _x | 65.13 lbs/day | 85 lbs/day | NO |
| ROG | 61.5 lbs/day | - | NO |
| PM ₁₀ | 66.74 lbs/day and 4.5 tons/yr | 80 lbs/day and 14.6 tons/yr* | NO |
| PM _{2.5} | 17.41 lbs/day and 1.24 tons/yr | 82 lbs/day and 15 tons/yr* | NO |
| Full Buildout of the Annexation Area | | | |
| NO _x | 75.98 lbs/day | 85 lbs/day | NO |
| ROG | 49.13 lbs/day | - | NO |
| PM ₁₀ | 73.95 lbs/day and 5.42 tons/yr | 80 lbs/day and 14.6 tons/yr* | NO |
| PM _{2.5} | 11.21 lbs/day and 1.49 tons/yr | 82 lbs/day and 15 tons/yr* | NO |
| * The above thresholds for PM only apply when all feasible BACT/BMPs are applied. If all feasible BACT/BMPs are not applied, then the applicable threshold of significance for PM is 0. | | | |
| Source: CalEEMod, February 2024. | | | |

4.3-1(b) *Prior to approval of any Improvement Plans, the project applicant shall provide proof of compliance with the following to the satisfaction of the City of Sacramento Community Development Department:*

The project applicant shall show on the plans via notation that the contractor shall ensure that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction of all project components (i.e., construction of the industrial park, nonparticipating parcels, and off-site force main), including owned,



leased, and subcontractor vehicles, shall be a combination of engine Tier 3 or Tier 4 off-road construction equipment, or hybrid, electric, or alternatively fueled equipment (or any combination of the above), sufficient to achieve a fleet-wide average reduction in construction-related NO_x emissions to below the applicable SMAQMD thresholds of significance (85 lbs/day). For instance, the emissions presented in Table 4.3-8 of the Draft EIR were achieved by requiring all equipment used during construction to be engine Tier 4.

In addition, all off-road equipment operating at the construction site must be maintained in proper working condition according to manufacturer's specifications. Idling shall be limited to five minutes or less in accordance with the In-Use Off-Road Diesel Vehicle Regulation as required by CARB. Clear signage regarding idling restrictions shall be placed at the entrances to the construction site.

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

Conformance with the foregoing requirements shall be included as notes and be confirmed through review and approval of grading plans by the City of Sacramento Community Development Department.

4.3-2 Conflict with or obstruct implementation of the applicable air quality plan during project operation. Based on the analysis below, and with the implementation of mitigation, the impact is significant and unavoidable.

Operational emissions of ROG, NO_x, and PM would be generated by the proposed project from both mobile and stationary sources. Day-to-day activities such as the future vehicle trips to and from the project site would make up the majority of the mobile emissions. Emissions would also occur from area sources and consumer products (e.g., deodorants, cleaning products, spray paint, etc.).

As discussed above, due to the nonattainment designations of the area, the SMAQMD has developed plans to attain the State and federal standards for ozone and particulate matter. The current applicable air quality plan for the proposed project area is the *Sacramento Regional 2009 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (Ozone Attainment Plan), updated July 24, 2017. The Ozone Attainment Plan demonstrates how existing and new control strategies would provide the necessary future emission reductions to meet the CAA requirements, including the federal AAQS. Adopted SMAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment, consistent with the applicable air quality plan. Thus, if a



project's operational emissions exceed the SMAQMD's mass emission thresholds, a project would be considered to conflict with or obstruct implementation of the SMAQMD's air quality planning efforts.

Emissions of ROG, NO_x, and PM₁₀ would be generated during operations of the proposed project from both mobile and stationary sources. Emissions related to operation of the proposed project would include sources such as architectural coatings, landscape maintenance equipment exhaust, and consumer products (e.g., deodorants, detergents, cleaning products, spray paint, insecticides, floor finishes, polishes, etc.). However, the most significant source of emissions related to the proposed project would be from mobile sources. As discussed in the Method of Analysis section above, to capture the potential emissions related to mobile sources from the proposed project, project-specific trip generation rates and VMT estimates were provided by DKS. In addition, emissions associated with heavy-duty trucks travelling to and from the project site were calculated off-model. The estimated emissions from CalEEMod and EMFAC2021 were added together to represent total project emissions.

The project is required to comply with all SMAQMD rules and regulations related to operations. The modeling was adjusted to reflect the project's inherent site or design features and compliance with applicable regulations. It should be noted that the project would not involve installation or operation of any pieces of equipment that would require implementation of SMAQMD's BACT measures; therefore, the project would be subject to SMAQMD's mass emissions thresholds for PM₁₀ and PM_{2.5}. As discussed above, the maximum operational emissions were estimated for development of both the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario.

The maximum unmitigated operational emissions for both project scenarios are presented in Table 4.3-9, below. It should be noted that the proposed off-site force main would not result in operational emissions, and thus, is not included in the analysis below.

Industrial Park (Proposed Project Scenario)

As shown in Table 4.3-9, operation of the proposed project under the Proposed Project Scenario would result in emissions of PM₁₀ and PM_{2.5} below the applicable SMAQMD thresholds of significance. However, emissions of ROG and NO_x would exceed SMAQMD thresholds of significance. Therefore, operation of the proposed project could substantially contribute to the SVAB's non-attainment status for ozone. Accordingly, operational emissions associated with the proposed project could violate an air quality standard or contribute to an existing or projected air quality violation, and a potentially significant impact could occur associated with project operations.

Industrial Park and Nonparticipating Parcels (Full Buildout of the Annexation Area Scenario)

As shown in Table 4.3-9, operation of the proposed project under the Full Buildout of the Annexation Area Scenario would also result in emissions of PM₁₀ and PM_{2.5} below the applicable SMAQMD thresholds of significance. However, emissions of ROG and NO_x would further exceed the applicable SMAQMD thresholds of significance. Therefore, operation of the proposed project, including future development within the



non-participating parcels, could substantially contribute to the SVAB’s non-attainment status for ozone. Accordingly, operational emissions associated with full buildout of the annexation area could violate an air quality standard or contribute to an existing or projected air quality violation, and a potentially significant impact could occur associated with project operations.

| Table 4.3-9 Maximum Unmitigated Project Operational Emissions | | | |
|--|-----------------------------------|------------------------------|---------------------------|
| Pollutant | Project Emissions | Operational Threshold | Exceeds Threshold? |
| Proposed Project | | | |
| NO _x | 628.33 lbs/day | 65 lbs/day | YES |
| ROG | 172.37 lbs/day | 65 lbs/day | YES |
| PM ₁₀ | 32.99 lbs/day and 5.36 tons/yr | 80 lbs/day and 14.6 tons/yr | NO |
| PM _{2.5} | 17.91 lbs/day and 2.74 tons/yr | 82 lbs/day and 15 tons/yr | NO |
| Full Buildout of the Annexation Area | | | |
| NO _x | 738.56 lbs/day | 65 lbs/day | YES |
| ROG | 214.49 lbs/day | 65 lbs/day | YES |
| PM ₁₀ | 45.84 lbs/day and 7.68 tons/yr | 80 lbs/day and 14.6 tons/yr | NO |
| PM _{2.5} | 19.52 lbs/day and 3.07 tons/yr | 82 lbs/day and 15 tons/yr | NO |
| <i>Source: CalEEMod, June 2023.</i> | | | |

Conclusion

As shown in Table 4.3-9, the emissions resulting from operation of the proposed project under both the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario would be below the applicable SMAQMD thresholds for PM_{2.5} and PM₁₀. However, ROG and NO_x emissions would be above the applicable SMAQMD thresholds of significance under both project scenarios. Based on the emissions presented in Table 4.3-9, operation of the proposed project could create a conflict with or obstruct implementation of the applicable air quality plan, and a **significant** impact could result.

Mitigation Measure(s)

For land development projects that are anticipated to exceed the SMAQMD’s operational emissions thresholds of significance for criteria pollutants, such as the proposed project, SMAQMD requires that the project proponent develop an Air Quality Mitigation Plan (AQMP) describing what features the project will incorporate to reduce operational criteria pollutant emissions from baseline conditions. SMAQMD guidance provides that the creation and implementation of an AQMP represents all feasible mitigation, provided that the AQMP demonstrates a 15 percent reduction of ozone precursors below baseline emissions for projects considered in the SIP and 35 percent for projects not considered in the SIP. As the proposed project was not anticipated by the City in its current General Plan or other community plan, development of the project is not included in the growth assumptions of the SIP. As such, a reduction of 35 percent below baseline emissions of ozone precursors is required for the proposed project. According to SMAQMD, a project’s ozone precursor emissions reductions goals



should be based on mobile emissions only. Mitigation Measure 4.3-2 requires preparation and implementation of a project-specific AQMP. The AQMP (see Appendix D of this EIR) was prepared using assumptions associated with full buildout of the annexation area, to represent a worst-case scenario. As shown in Table 4.3-10, the proposed project would meet the 35 percent reduction target with implementation of Mitigation Measure 4.3-2, which represents all feasible mitigation. However, even with a 35 percent reduction, emission levels would still exceed the applicable threshold of significance and, therefore, the impact would remain *significant and unavoidable*.

| Table 4.3-10 | | | |
|--|-------------|-----------------------|------------------------|
| AQMP Operational Criteria Pollutant Emissions Reduction Summary (tons/yr) | | | |
| Scenario | ROG | NO_x | PM₁₀ |
| Maximum Mobile Emissions Baseline ¹ | 10.18 | 85.88 | 22.51 |
| TARGET (35% Reduction) | 3.56 | 30.06 | All Feasible |
| <i>Total Tons Reduced</i> | 8.56 | 38.03 | 16.26 |
| Difference | 5.00 | +7.97 | N/A |
| Meets Target | YES | YES | YES |
| ¹ According to SMAQMD, a project's ozone precursor emissions reductions targets should be based on mobile emissions only; however, reductions of ozone precursors from non-mobile emission reduction measures (e.g., natural gas or energy reductions) may still be accounted for and applied towards the emission reduction targets. | | | |
| Source: CalEEMod, June 2023 (see Appendix D). | | | |

4.3-2 *Prior to the approval of project improvement plans for both the industrial park and nonparticipating parcels, the project applicant shall comply with the provisions of the Air Quality Management Plan prepared for the proposed project (see Appendix D), and incorporate all requirements into the Airport South Industrial Project conditions of approval. The measures included in the AQMP include the following:*

1. *Natural gas use shall be prohibited in all land uses, with the exception of the restaurant kitchen.*
2. *The project shall implement a Transportation Management Association (TMA), such as Jibe North Natomas (for more information, visit <https://jibe.org/>). The TMA must comply with the following criteria, and is subject to approval by the City of Sacramento and SMAQMD:*
 - a. *The TMA must be legally constituted as a non-profit organization, Property/Business Improvement District (PBID), or a government entity with a non-revocable funding mechanism, such as a community finance district, dedicated to TMA operations and services; and*
 - b. *The TMA must provide a minimum level of TDM services to employees and residents within the area covered by the AQMP sufficient to achieve the emission reductions claimed by the measure. Services must be enumerated and funded to the satisfaction of the lead agency and SMAQMD.*



3. *The project applicant shall require all tenants of the on-site industrial uses to use zero-emission forklifts.*
4. *The project applicant shall require that 4.5 percent of the heavy-duty vehicle fleet be zero emission by full buildout of the annexation area. It should be noted that in the event there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient vehicles/trucks are not commercially available for the intended application, the “clean fleet requirements” may be adjusted as minimally as possible by the City’s Community Development Department to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks.*
5. *The project shall provide complete sidewalks separated from roadway throughout the project site and pedestrian crossing at intersections on-site to ensure employees and visitors can walk between land uses/businesses. The project shall also connect the pedestrian network on-site to the adjacent properties off-site (including South Bayou Way, Power Line Road and potential future connections) as indicated on the preliminary site plan when those portions of the site develop.*
6. *Provide EV Ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces.*

4.3-3 Expose sensitive receptors to substantial pollutant concentrations. Based on the analysis below, and with the implementation of mitigation, the impact is *less than significant*.

As noted previously, the nearest sensitive receptors include the single-family residences and Paso Verde K-8 School, located approximately 200 feet east and south of the project site. The major pollutant concentrations of concern are localized CO emissions, TAC emissions, and criteria pollutant emissions, which are addressed in further detail below.

Localized CO Emissions

The following includes a discussion of impacts related to localized CO emissions associated with both the industrial park and the nonparticipating parcels.

Industrial Park and Nonparticipating Parcels

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Per the SMAQMD Guide, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple years.³⁰ Consequently, the proposed project is not anticipated to result in significant impacts to air quality related to localized CO emissions.

³⁰ Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 4: Operational Criteria Air Pollutant and Precursor Emissions*. June 2020.



TAC Emissions

Another category of environmental concern is TACs. The CARB's Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) provides recommended setback distances for sensitive land uses from major sources of TACs, including, but not limited to, freeways and high traffic roads, gasoline dispensing facilities, chrome plating operations, distribution centers, and rail yards. The CARB has identified DPM from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Health risks associated with TACs are a function of both the concentration of emissions and the duration of exposure, where the higher the concentration and/or the longer the period of time that a sensitive receptor is exposed to pollutant concentrations would correlate to a higher health risk.

The proposed project would involve components that would result in emissions of TACs. In particular, implementation of the proposed project would result in emissions of DPM during project construction and from the on-site use of heavy-duty diesel trucks to transport goods during project operations. Each source of TACs is discussed in further depth in the sections below.

Construction Emissions

The following includes a discussion of impacts regarding construction-related TAC emissions associated with both the industrial park and the nonparticipating parcels.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Short-term, construction-related activities could result in the generation of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction is temporary and occurs over a relatively short duration in comparison to the operational lifetime of the proposed project. Health risks are typically associated with exposure to high concentrations of TACs over extended periods of time (e.g., 30 years or greater). As discussed above, construction of the proposed project is anticipated to occur over an approximately six-year period.

All construction equipment and operation thereof would be regulated per the CARB's In-Use Off-Road Diesel Vehicle Regulation, which is intended to help reduce emissions associated with off-road diesel vehicles and equipment, including DPM. Project construction would also be required to comply with all applicable SMAQMD rules and regulations, particularly associated with permitting of air pollutant sources. In addition, construction equipment would operate intermittently throughout the day and only on portions of the sites at a time.

Because construction equipment on-site would not operate for long periods of time and would be used at varying locations within the sites, associated emissions of DPM would not occur at the same location (or be evenly spread throughout the entire project site) for long periods of time. Due to the temporary nature of construction and the relatively short duration of



potential exposure to associated emissions, the potential for any one sensitive receptor in the area to be exposed to concentrations of pollutants for a substantially extended period of time would be low. Therefore, construction associated with the proposed project would not be expected to expose any sensitive receptors to substantial pollutant concentrations. In addition, it should be noted that due to the temporary nature of construction activities, construction of the proposed project would not result in any worse impacts than what would occur during operations associated with DPM emissions generated by heavy duty truck traffic, as discussed in further detail below. In addition, as discussed above, Mitigation Measure 4.3-1(b) would require the use of cleaner engine construction equipment, such as Tier 4 final equipment, during project construction, which would further help to reduce DPM emissions during construction.

Heavy Duty Truck Circulation

The following discussion includes both a project-level analysis regarding the industrial park and program-level analysis regarding the nonparticipating parcels associated with potential impacts that could occur due to DPM emissions generated by heavy duty truck traffic associated with on-site industrial uses.

Industrial Park

The proposed project would include the development of approximately 5,204,500 sf of industrial uses within project site. While specific tenants of the proposed warehouses have not been identified at this time, industrial uses are anticipated to involve the use of heavy-duty diesel trucks associated with the movement of goods to and from the sites. The operation of heavy-duty diesel-powered trucks would result in an increase in emissions of DPM within the project sites and on the surrounding roadways. It should be noted that the HC-PUD uses are not anticipated to involve substantial use of heavy-duty trucks. Thus, DPM emissions associated with the HC-PUD uses are not evaluated below.

To assess the increase in DPM emissions associated with heavy-duty diesel trucks travelling to and from the project site, the anticipated truck route was mapped, and idling points were placed at the nearest loading dock to the sensitive receptors associated with each of the five proposed warehouse buildings.

DPM is considered a subset of PM_{2.5} emissions. Thus, the estimated concentration of PM_{2.5} was used as a proxy to represent emissions of DPM. Emissions rates for the heavy-duty diesel-powered trucks were obtained through the CARB's EMFAC2021 database. Once the emissions of DPM were determined, the concentration of DPM at nearby receptors was then estimated using the AMS/EPA AERMOD. Finally, the associated cancer risk and non-cancer hazard index were calculated using the CARB's HARP 2 RAST, which calculates the cancer and non-cancer health impacts using the risk assessment guidelines of the 2015 OEHHA Guidance Manual for



Preparation of Health Risk Assessments.³¹ The modeling was performed in accordance with the USEPA’s User’s Guide for the AMS/EPA Regulatory Model – AERMOD³² and the 2015 OEHHA Guidance Manual. The exposure period in HARP 2 RAST was set to a 30-year exposure period. Table 4.3-11 presents the result of the health risk assessment prepared for the proposed project.

| Table 4.3-11 Maximum Cancer Risk and Hazard Index Associated with Heavy-Duty Diesel Trucks | | | |
|---|--|-------------------------------|---------------------------------|
| | Cancer Risk (per million persons) | Acute Hazard Index | Chronic Hazard Index |
| At Maximally Exposed Receptor | 9.53 | 0.00 | 0.00 |
| <i>Thresholds of Significance</i> | <i>10</i> | <i>1.0</i> | <i>1.0</i> |
| Exceed Thresholds? | NO | NO | NO |
| <i>Sources: EMFAC, AERMOD, and HARP 2 RAST, May 2023 (see Appendix C).</i> | | | |

In addition, Figure 4.3-3 provides a visual representation of the emissions concentration dispersion within the project area due to heavy-duty truck traffic associated with the proposed industrial warehouses. Figure 4.3-3 also presents the maximally exposed sensitive receptor, represented by a white X, which is located just east of the project site. As discussed above, land uses that are typically considered to be sensitive receptors include residences, schools, day care centers, playgrounds, and medical facilities. The proposed project does not include the development of any such uses. The nearest sensitive receptors include the single-family residences and Paso Verde K-8 School, located approximately 200 feet east and 200 feet south of the project site, respectively.

As shown in Table 4.3-11, operation of heavy-duty diesel-powered trucks on roadways and within the project site would result in cancer risk and hazard index at the maximally exposed receptor below the applicable SMAQMD thresholds of significance.

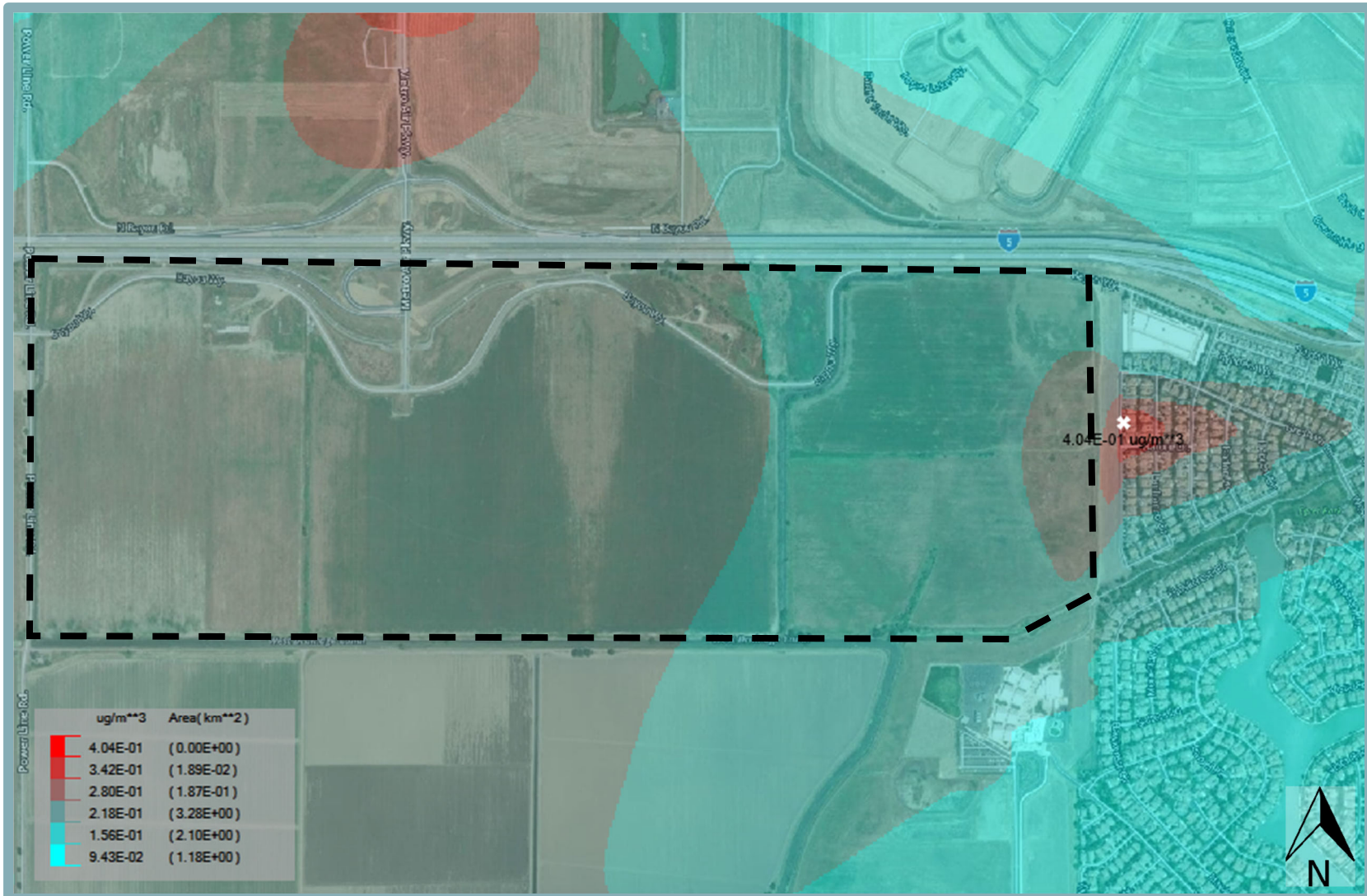
Consequently, operation of the proposed project would not expose sensitive receptors to excess concentrations of pollutants, and the proposed project would result in a less-than-significant impact related to DPM.

³¹ Office of Environmental Health Hazard Assessment. *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments* [pg. 8-18]. February 2015.

³² U.S. Environmental Protection Agency. *User’s Guide for the AMS/EPA Regulatory Model (AERMOD)*. December 2016.



**Figure 4.3-3
AERMOD Results**



Source: AERMOD, May 2023 (see Appendix C).



Nonparticipating Parcels

The project site also includes six nonparticipating parcels, comprised of approximately 83 acres, that would result in an additional approximately 1,404,800 sf future industrial uses within the site. As discussed above, the CARB Handbook provides recommended setback distances for sensitive land uses from major sources of TACs, including distribution centers.

DPM is a highly dispersive gas, and concentrations of DPM decline rapidly with distance.³³ Based on the CARB's Handbook, an 80 percent drop-off in pollutant concentrations occurs at approximately 1,000 feet from a distribution center (i.e., an industrial warehouse that accommodates more than 100 heavy-duty trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week). Therefore, the CARB Handbook's recommended setback distance for sensitive land uses from distribution centers is 1,000 feet.

The majority of the nonparticipating parcels are located more than 1,000 feet from the nearest sensitive receptor, and, therefore, are not anticipated to expose sensitive receptors to excess concentrations of DPM if distribution centers are developed on such parcels in the future. However, Parcel 8, which is a 64.3-acre nonparticipating parcel owned by Cayocca, is located adjacent to the existing neighborhood to the east of the project site. Given that site-specific development plans or designs have not been proposed for Parcel 8, the location of the loading docks are not currently known. As a result, health risks associated with Parcel 8 would be speculative, and, thus, such risks associated with Parcel 8 have not been modeled in this analysis.

Nonetheless, because the potential exists for a future distribution center to be developed on Parcel 8 within 1,000 feet of the existing sensitive receptors, future development of Parcel 8 could expose sensitive receptors to excess concentrations of pollutants, and the proposed project could result in a significant impact related to DPM.

Criteria Pollutants

The following includes a discussion of health impacts related to criteria pollutant emissions associated with both the industrial park, the nonparticipating parcels, and off-site improvement area.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Recent rulings from the California Supreme Court (including the *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 case regarding the proposed Friant Ranch Project) have underscored the need for analysis of potential health impacts resulting from the emission of criteria pollutants during operations of proposed projects. Although analysis of project-level health risks related to the emission of CO and TACs has long

³³ California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.



been practiced under CEQA, the analysis of health impacts due to individual projects resulting from emissions of criteria pollutants is a relatively new field. SMAQMD released the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (Guidance) for the analysis of criteria emissions in areas within the District's jurisdiction.³⁴ The Guidance represents SMAQMD's effort to develop a methodology that provides a consistent, reliable, and meaningful analysis in response to the Supreme Court's direction on correlating health impacts to a project's emissions.

The Guidance was prepared by conducting regional photochemical modeling, and relies on the USEPA's Benefits Mapping and Analysis Program (BenMAP) to assess health impacts from ozone and PM_{2.5}. SMAQMD has prepared two tools that are intended for use in analyzing health risks from criteria pollutants. Small projects with criteria pollutant emissions close to or below SMAQMD's adopted thresholds of significance may use the Minor Project Health Effect Screening Tool, while larger projects with emissions between two and six times greater than SMAQMD's adopted thresholds may use the Strategic Area Project Health Screening Tool. Considering the proposed project would result in overall emissions which exceed the SMAQMD's thresholds of significance, the project would qualify for the Strategic Area Project Health Screening Tool. The Strategic Area Project Health Screening Tool is based on location-specific modeling in five specific growth area locations. The proposed project is located closest to the Downtown Sacramento location in the Strategic Area Project Health Screening Tool. Results from the Strategic Area Project Health Screening Tool are included as Appendix C to this EIR. Table 4.3-12 presents the health risks associated with operational criteria pollutant emissions resulting from implementation of the proposed project, including future development of the non-participating parcels. However, it should be noted that the maximum amount of emissions that can be input into the Strategic Area Project Health Screening Tool for all criteria pollutants is 656 lbs/day. As shown in Table 4.3-9, operation of the proposed project under the Full Buildout of the Annexation Area Scenario would result in 738.56 lbs/day of NO_x emissions. Therefore, the proposed project's actual unmitigated health impacts associated with criteria pollutant emissions would be slightly higher than what is presented in Table 4.3-12. However, as noted above, with implementation of Mitigation Measure 4.3-2 the proposed project's operational emissions, and subsequently the proposed projects health impacts associated with criteria pollutant emissions, would be reduced as compared to what is presented in Table 4.3-12.

As shown in the table, according to the Strategic Area Project Health Screening Tool, the proposed project could result in 5.6 premature deaths per year due to the project's PM_{2.5} emissions and 0.32 premature deaths per year due to the project's ozone emissions. Such numbers represent a very small increase over the background incidence of premature deaths due to PM_{2.5} and ozone concentrations (0.01 percent and 0.001 percent, respectively). In addition, according to the Strategic Area Project Health Screening Tool, PM_{2.5} emissions from the proposed project could result in 2.5 asthma-related emergency room visits, and ozone emissions from the proposed project could result in 5.5 asthma-related emergency room visits. Such numbers represent a minute increase over the background level of asthma-related emergency room visits (0.01 percent and 0.03 percent, respectively).

³⁴ Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. October 2020.



**Table 4.3-12
 Health Effects from Proposed Project**

| Health Endpoint | Age Range ¹ | Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ² | Percent of Background Health Incidences Across the 5-Air-District Region ³ | Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴ |
|--|------------------------|--|---|--|
| | | (Mean) | (%) | |
| Respiratory PM_{2.5} | | | | |
| Emergency Room Visits, Asthma | 0-99 | 2.3 | 0.012 | 18,419 |
| Hospital Admissions, Asthma | 0-64 | 0.15 | 0.0079 | 1,846 |
| Hospital Admissions, All Respiratory | 65-99 | 0.77 | 0.0039 | 19,644 |
| Cardiovascular PM_{2.5} | | | | |
| Hospital Admissions, All Cardiovascular (less Myocardial Infarctions) | 65-99 | 0.40 | 0.0017 | 24,037 |
| Acute Myocardial Infarction, Nonfatal | 18-24 | 0.00020 | 0.0054 | 4 |
| Acute Myocardial Infarction, Nonfatal | 25-44 | 0.018 | 0.0057 | 308 |
| Acute Myocardial Infarction, Nonfatal | 45-54 | 0.040 | 0.0054 | 741 |
| Acute Myocardial Infarction, Nonfatal | 55-64 | 0.068 | 0.0055 | 1,239 |
| Acute Myocardial Infarction, Nonfatal | 65-99 | 0.26 | 0.0051 | 5,052 |
| Mortality PM_{2.5} | | | | |
| Mortality, All Cause | 30-99 | 5.6 | 0.013 | 44,766 |
| Respiratory Ozone | | | | |
| Hospital Admissions, All Respiratory | 65-99 | 0.39 | 0.002 | 19,644 |
| Emergency Room Visits, Asthma | 0-17 | 2.1 | 0.036 | 5,859 |
| Emergency Room Visits, Asthma | 18-99 | 3.4 | 0.027 | 12,560 |
| Mortality Ozone | | | | |
| Mortality, Non-Accidental | 0-99 | 0.26 | 0.00084 | 30,386 |
| <p>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.</p> <p>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 5-Air-District Region.</p> <p>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.</p> <p>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.</p> | | | | |
| <p>Source: SMAQMD, Minor Project Health Effects Screening Tool. September 2020 (see Appendix C).</p> | | | | |



In addition, the results of the Minor Project Health Effects Screening Tool have been presented for informational purposes only.

Conclusion

Based on the above analysis, the operations of the proposed project would not be anticipated to result in the production of substantial concentrations of localized CO or criteria pollutants. In addition, the proposed project would not be anticipated to result in the production of substantial concentrations of TACs, including DPM.

However, Parcel 8, the 64.3-acre nonparticipating parcel owned by Cayocca, is located adjacent to the existing neighborhood to the east of the project site. Therefore, the potential exists for a future distribution center to be developed on Parcel 8 within 1,000 feet of the existing sensitive receptors.

As a result, future development of Parcel 8 could expose sensitive receptors to excess concentrations of DPM. Therefore, the proposed project could result in the exposure of sensitive receptors to substantial pollutant concentrations, and a **significant** impact could result.

Mitigation Measure(s)

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

- 4.3-3 *If Parcel 8 (the 64.3-acre nonparticipating parcel owned by Cayocca) is proposed to be developed with a distribution center (i.e., an industrial warehouse that accommodates more than 100 heavy-duty trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week) within 1,000 feet of a sensitive receptor, prior to the issuance of any building permit, a Health Risk Assessment (HRA) shall be conducted to calculate the cancer risk associated with on-site truck diesel particulate matter (DPM) emissions.*

The HRA shall be prepared in accordance with SMAQMD guidelines, as well as the guidelines identified in the California Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual for Preparation of Health Risk Assessments. If health risks associated with Parcel 8 are determined to exceed the applicable SMAQMD thresholds, a qualified air quality consultant shall identify measures sufficient to reduce the project's health risks to below the SMAQMD's thresholds of significance. Reduction measures may include, but are not limited to, relocation of loading docks to further than 1,000 feet from sensitive receptors, electrification of the heavy-duty truck fleet, and/or other options as they become available. Conformance with the foregoing requirement shall be confirmed through review and approval of the HRA by the City of Sacramento Community Development Department.



4.3-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Based on the analysis below, the impact is *less than significant*.

The following discussion applies to the potential for both project components to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Emissions of pollutants have the potential to adversely affect sensitive receptors within the project area. Pollutants of principal concern include emissions leading to odors, emissions that have the potential to cause dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in Impacts 4.3-1 through 4.3-3 above. Therefore, the following discussion focuses on emissions of odors and dust.

Odors

Odors are generally regarded as an annoyance rather than a health hazard. Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, quantitative methodologies to determine the presence of a significant odor impact are difficult. Certain land uses such as wastewater treatment and conveyance facilities, landfills, confined animal facilities, composting operations, food manufacturing plants, refineries, and chemical plants have the potential to generate considerable odors. Operations of the proposed project would involve activities typical to commercial and industrial/warehouse developments, and, consequently, would not be anticipated to result in the creation of substantial odors.

Diesel fumes from construction equipment could be found to be objectionable; however, as addressed above, operation of construction equipment would be regulated by SMAQMD rules and regulations, restricted to the hours of 7:00 AM to 6:00 PM Monday through Saturday, and between 9:00 AM and 6:00 PM on Sundays, pursuant to Section 8.68.080 of the Sacramento City Code, and would occur intermittently throughout the course of a day. Furthermore, considering the large development area, construction equipment would operate at various locations throughout the project site intermittently, and the distances from the nearest sensitive receptors would allow for dispersal of diesel odors. For the aforementioned reasons, the project would not result in any noticeable objectionable odors associated with construction.

In addition, SMAQMD Rule 402, Nuisance, prohibits the emission of nuisance air contaminant discharges, including odors, and provides enforcement of odor control. Rule 402 is complaint-based, where if public complaints are sufficient to cause the odor source to be considered a public nuisance, then SMAQMD is required to investigate the identified source, as well as determine and ensure a solution for the source of the complaint, which could include operational modifications to correct the nuisance condition. Thus, although not anticipated, if odor or air quality complaints are made upon development of the proposed project, SMAQMD would be required



(per SMAQMD Rule 402) to ensure that such complaints are addressed and mitigated, as necessary.

Dust

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

Conclusion

For the aforementioned reasons, project construction and operations would not result in substantial emissions, such as those leading to odors or dust, which could adversely affect a substantial number of people, and a ***less-than-significant*** impact would result.

Mitigation Measure(s)

None required.

4.3-5 Result in the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency. Based on the analysis below, the impact is *less than significant*.

The following discussion applies to the potential for both project components to result in the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The proposed project would include the development of industrial, retail/highway commercial, and hotel/hospitality uses within the 353.5-acre project site. Energy use associated with operation of the proposed project would be typical of such uses, requiring electricity for interior and exterior building lighting, HVAC systems, electronic equipment, machinery, refrigeration, appliances, security systems, and more. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, the proposed project would result in transportation energy use associated with vehicle trips generated by employees and visitors travelling to and from the project site. Energy use associated with construction of the proposed project, as well as building energy use and transportation energy use are discussed separately below.



Construction Energy Use

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

Typically, at construction sites, electricity from the existing grid is used to power portable and temporary lights or office trailers. Because grid electricity would be used primarily for steady sources such as lighting, not sudden, intermittent sources such as welding or other hand-held tools, the increase in electricity usage at the site during construction would not be expected to cause any substantial peaks in demand. Construction of the proposed project, which would result in temporary increases in electricity demand, would not cause a permanent or substantial increase in demand that would exceed SMUD's demand projections or exceed the ability of SMUD's existing infrastructure to handle such an increase. Therefore, project construction would not result in any significant impacts on local or regional electricity supplies, the need for additional capacity, or on peak or base period electricity demands. In addition, standards or regulations specific to construction-related electricity usage do not currently exist.

Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, building construction), only portions of the project site would be disturbed at a time, with operation of construction equipment occurring at different locations on the project site, rather than a single location. In addition, as discussed above, construction is temporary and occurs over a relatively short duration. Furthermore, all construction equipment and operation thereof would be regulated pursuant to the CARB In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing a five-minute limit on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. Furthermore, as a means of reducing emissions, construction vehicles are required to become cleaner through the use of renewable energy resources. Engine tiers are used to describe the emissions intensity and efficiency of an engine. Construction equipment with Tier 0 or Tier 1 engines are the least efficient, and Tier 4 is the most efficient. In November 2021, the CARB began developing standards for Tier 5 engines. As of 2015, vehicles with Tier 0 and Tier 1 engines are prohibited from being added to equipment fleets. Fleets with a total horsepower over 2,501, excluding non-profit training centers, may not add any Tier 2 engines and, starting January 1, 2024, all newly added engines must be Tier 4 final or higher.³⁵ The In-Use Off-Road Diesel Vehicle Regulation would, therefore, help to improve fuel efficiency for equipment used in construction of the proposed project.

³⁵ California Air Resources Board. *In-Use Off Road Diesel-Fueled Fleets Regulation Overview*, Revised October 2016. 2016.



The CARB enforces off-road equipment regulations through their reporting system, Diesel Off-road Online Reporting System (DOORS). Each construction fleet is required to update their DOORS account within 30 days of buying or selling a vehicle, and DOORS automatically calculates the fleet average index for each fleet. The fleet average index is an indicator of a fleet's overall emission rate, and is based on each vehicle's engine horsepower and model year, and whether it is equipped with a Verified Diesel Emission Control Strategy (VDECS). If a fleet cannot, or does not want to, meet the fleet average target in a given year, the fleet may instead choose to comply with the BACT requirements. A fleet may meet the BACT requirements each year by turning over or installing VDECS on a certain percentage of its total fleet horsepower. 'Turnover' means retiring a vehicle, designating a vehicle as permanent low-use (a vehicle used less than 200 hours per year), repowering a vehicle with a higher tier engine, or rebuilding the engine to a more stringent emission standard. By each compliance date (annually on January 1st), the fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the BACT requirements.³⁶ The project would be required to comply with such regulations, which would ensure that construction equipment meets all State efficiency requirements.

Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to further reduce demand on oil and limit emissions associated with construction. Over time, as technology progresses and more stringent emissions standards are put in place, construction equipment engines become increasingly efficient. Project construction would also be required to comply with all applicable SMAQMD rules and regulations, which are indirectly related to energy efficiency, which would help to further reduce energy use associated with the proposed project.

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

Building Energy Demand

The proposed project is required to comply with all applicable standards and regulations regarding energy conservation and fuel efficiency, including the CBSC and CARB standards, which would ensure that the future uses would be designed to be energy efficient to the maximum extent practicable. Adherence to the most recent CALGreen Code and the Building Energy Efficiency Standards would ensure that the proposed development on-site would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance attics and walls, and high efficacy lighting. In addition, State regulations promote the generation of renewable energy and encourage energy efficiency through requirements placed on utility providers and strict development standards. For instance, the RPS requires utilities, including the SMUD, to procure an increasing

³⁶ California Air Resources Board. *Frequently Asked Questions, Regulation for In-Use Off-Road Diesel-Fueled Fleets (Off-Road Regulation)*. August 2014.



proportion of electricity from renewable sources. Ultimately the RPS requirements mandate that all electricity produced within the State be renewably sourced by the year 2045.

Based on the air quality modeling prepared for the proposed project, the proposed project (including full buildout of the non-participating parcels) is anticipated to result in increased electricity consumption of approximately 93.85 GWh annually during operations. It is noted that, compared to the electricity consumption for all of Sacramento County, the proposed project's contribution would represent a 0.84 percent increase in electricity demand. Although the project would increase electricity demand in the project area, given the relatively small increase as compared to energy usage in the region, the increased demand is not anticipated to conflict with SMUD's ability to meet the RPS requirements, or exceed SMUD's capacity such that the proposed project's energy demands would not be met.

With regard to landscaping and maintenance equipment, AB 1346 would require that all small off-road engines purchased after January 1, 2024 are all-electric. Given that SMUD has vowed to reach zero carbon emissions in their power supply by 2030,³⁷ the use of electric maintenance equipment would be considered more energy efficient than diesel- or gas-powered maintenance equipment.

Transportation Energy Demand

The average fuel economy for the U.S. passenger vehicle fleet was 25 miles per gallon (mpg) in 2021, the most recent year such data is available.³⁸ An average of 25 mpg and an annual VMT of approximately 16,828,967³⁹ for the project would result in the consumption of approximately 15,838 barrels of gasoline a year. California is estimated to consume approximately 605 million barrels of petroleum per year.⁴⁰ Based on the annual consumption within the State, vehicle trips generated by the proposed project would result in a 0.0026 percent increase in the State's current consumption of gasoline.

The calculation above is likely an overestimate, as the estimate does not account for the increasing ownership of electric vehicles. California leads the nation in registered alternatively-fueled and hybrid vehicles. In fact, under SB 500, the State has required that, starting in the year 2030, all cars sold shall be zero-emission/electric vehicles. In addition, State-specific regulations encourage fuel efficiency and reduction of dependence on oil. Improvements in vehicle efficiency and fuel economy standards help to reduce consumption of gasoline and reduce the State's dependence on petroleum products. The 2022 CBSC requires new developments to include the necessary electrical infrastructure for EV charging stations. A total of 3,670 vehicle parking stalls would be provided on-site. Based on the 2022 CBSC, for non-residential projects that include more than 201 parking spaces, 20 percent of the parking spaces

³⁷ Sacramento Municipal Utility District. *2030 Zero Carbon Plan*. April 2021.

³⁸ U.S. Energy Information Administration. *Total Energy, Table 1.8 Motor Vehicle Mileage, Fuel Consumption, and Fuel Economy*. Accessible at: <https://www.eia.gov/totalenergy/data/browser/?tbl=T01.08#/?f=A&start=200001>. Accessed February 2024.

³⁹ The annual VMT estimate presented herein is based on data provided by DKS for the proposed project.

⁴⁰ U.S. Energy Information Administration. *California: State Profile and Energy Estimates*. Accessible at: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA. Accessed February 2024.



are required to be EV capable, and 25 percent of the EV capable spaces are required to include electric vehicle supply equipment (EVSE), which is installed charging receptacles or permanently installed chargers. The proposed project would be required to comply with the 2022 CBSC. As a result, a total of 734 EV capable spaces, and 184 EVSE spaces would be required within the site. Therefore, the actual consumption of gasoline associated with the proposed project is anticipated to be even lower than the 0.0024 percent statewide contribution noted above. Additionally, the proposed project would be required to comply with all applicable regulations associated with vehicle efficiency and fuel economy.

Conclusion

Based on the above, the proposed project would not be considered to result in a wasteful, inefficient, or unnecessary use of energy, and the proposed project is not anticipated to conflict with a State or local plan for renewable energy or energy efficiency. Thus, impacts would be considered ***less than significant***.

Mitigation Measure(s)

None required.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

A project’s emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. The geographic context for the cumulative air quality and GHG analysis includes the City of Sacramento and surrounding areas within the portion of the SVAB that is designated nonattainment for ozone and PM₁₀. Refer to Chapter 6, Statutorily Required Sections, for additional detail regarding the cumulative setting evaluated in this EIR.

4.3-6 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Based on the analysis below, and with the implementation of mitigation, the impact would be *cumulatively considerable and significant and unavoidable*.

The following discussion applies to the potential for both project components to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).



Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The proposed project is within a nonattainment area for ozone and PM₁₀. By nature, air pollution is largely a cumulative impact. The population growth and vehicle usage within the nonattainment area from the proposed project, in combination with other past, present, and reasonably foreseeable projects within Sacramento and surrounding areas, contributes to the region's adverse air quality impacts on a cumulative basis, and could either delay attainment of AAQS or require the adoption of additional controls on existing and future air pollution sources to offset emission increases. Thus, the project's emissions of criteria air pollutants would contribute to cumulative regional air quality effects.

As noted in the Standards of Significance section above, SMAQMD directs lead agencies to use the region's existing attainment plans as a basis for analysis of cumulative emissions. A project's interference with such plans may be determined through the use of the SMAQMD's recommended thresholds of significance for ozone precursors, PM_{2.5}, and PM₁₀. The SMAQMD's recommended cumulative thresholds are identical to the operational thresholds, both of which are presented in Table 4.3-6.

Accordingly, if the proposed project would result in an increase of ROG, NO_x, PM₁₀, or PM_{2.5} in excess of SMAQMD's operational phase cumulative-level emissions threshold, which are equivalent to SMAQMD's project-level operational emissions thresholds, the project could potentially result in a significant incremental contribution towards cumulative air quality impacts. The proposed project's unmitigated cumulative contribution to regional emissions is equivalent to the project's unmitigated operational emissions, as presented in Table 4.3-9.

As shown in Table 4.3-9, the proposed project's unmitigated operational emissions of PM₁₀ and PM_{2.5} would be below the SMAQMD's applicable thresholds of significance. However, the proposed project would result in operational emissions of ROG and NO_x, which exceed all applicable SMAQMD thresholds of significance. Therefore, the proposed project could be considered to result in a ***cumulatively considerable*** net increase of a criteria pollutant for which the project region is non-attainment.

Mitigation Measure(s)

Implementation of the following mitigation measure represents all feasible mitigation to address criteria pollutant emissions. However, as presented in Table 4.3-10, emission levels would still exceed the applicable thresholds of significance and, therefore, the impact would remain *significant and unavoidable*.

4.3-6 *Implement Mitigation Measure 4.3-2.*

4.3-7 Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Based on the analysis below, and with the implementation of mitigation, the project's



incremental contribution to this significant cumulative impact is less than cumulatively considerable.

The following discussion applies to the potential for both project components to result in the generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Buildout of the proposed project would contribute to increases of GHG emissions that are associated with global climate change during construction and operation, which are discussed in further detail below. It should be noted that the proposed off-site force main would result in GHG emissions only during project construction.

Construction GHG Emissions

The estimated unmitigated maximum construction-related emissions associated with the Proposed Project Scenario are presented in Table 4.3-13. Similarly, Table 4.3-14 presents the estimated unmitigated maximum construction-related emissions associated with the Full Buildout of the Annexation Area Scenario.

| Table 4.3-13 | | |
|---|----------------------------------|---------------------------|
| Maximum Unmitigated On-Site Construction GHG Emissions – Proposed Project (MTCO₂e/yr) | | |
| GHG Emissions | Threshold of Significance | Exceeds Threshold? |
| 5,422.54 | 1,100 | YES |
| <i>Source: CalEEMod, June 2023 (see Appendix C).</i> | | |

| Table 4.3-14 | | |
|---|----------------------------------|---------------------------|
| Maximum Unmitigated On-Site Construction GHG Emissions – Full Buildout of the Annexation Area (MTCO₂e/yr) | | |
| GHG Emissions | Threshold of Significance | Exceeds Threshold? |
| 6,400.43 | 1,100 | YES |
| <i>Source: CalEEMod, June 2023 (see Appendix C).</i> | | |

As shown in the tables, the maximum annual construction-related GHG emissions would be above the SMAQMD threshold of 1,100 MTCO₂e/yr under both project scenarios. Therefore, project construction could be considered to result in a cumulatively considerable contribution to global climate change. However, it should be noted that the net change in GHG emissions related to construction associated with the nonparticipating parcels would be 977.89 MTCO₂e/yr, which is approximately 15 percent of the overall GHG emissions associated with project construction.



Operational GHG Emissions

The unmitigated maximum annual operational GHG emissions were estimated under both the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario. The results are presented in Table 4.3-15.

| Table 4.3-15 Unmitigated Annual Operational GHG Emissions (MTCO₂e/yr) | | |
|---|-------------------------|---|
| Emission Source | Proposed Project | Full Buildout of Annexation Area |
| Area | 0.24 | 0.26 |
| Energy | 15,810.63 | 20,241.33 |
| Mobile ¹ | 41,607.79 | 48,833.4 |
| Offroad | 2,893.68 | 4,411.25 |
| Waste | 3,375.85 | 4,251.88 |
| Water | 1,729.94 | 2,193.65 |
| TOTAL ANNUAL GHG EMISSIONS | 65,418.13 | 79,931.77 |
| ¹ Mobile emissions include both passenger vehicle emissions estimated in CalEEMod, as well as heavy-duty vehicle emissions calculated off-model using EMFAC2021. | | |
| <i>Source: CalEEMod, June 2023 (see Appendix C).</i> | | |

The proposed project’s compliance with the SMAQMD’s BMPs is discussed in further detail below.

BMP-1: No Natural Gas

In order to be consistent with BMP 1, the proposed project (including both the industrial park and nonparticipating parcels) is required to include all electric appliances and plumbing. However, project specific information is not available to ensure that the proposed project would be designed and constructed without natural gas infrastructure. In addition, the complete prohibition of natural gas may be infeasible for the proposed project, as natural gas is anticipated to be used for cooking appliances in the proposed restaurant uses associated with the on-site highway commercial portion of the proposed project. All other components of the proposed project, including any space heating and HVAC systems on-site, would be required to be electric with implementation of Mitigation Measure 4.3-7(b).

Pursuant to SMAQMD’s Guidance, BMP-1 may be replaced with an alternative mitigation strategy that would reduce GHG to the same extent. Nonetheless, the proposed restaurant components of the proposed project would be required to pre-wire for a future retrofit to remove natural gas plumbing and become all-electric.

According to the CalEEMod results, natural gas combustion associated with the proposed restaurant uses would account for 158.77 MTCO₂e/yr. In order to fully comply with BMP-1 at full buildout, the proposed project must reduce overall GHG emissions by 158.77 MTCO₂e/yr. Compliance



with BMP-1 through the equivalent reduction in GHG emissions would be ensured by Mitigation Measure 4.3-7(b).

BMP-2: EV-Ready

Consistent with BMP-2, the proposed project would be required to provide EV Ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces (see Table 4.3-16). Given that the proposed project is anticipated to include a total of approximately 3,670 parking stalls, the project would be required to provide 1,652 EV Ready spaces, and 545 of the EV Ready spaces would be required to have EVSE, which are installed charging receptacles or permanently installed chargers. However, project specific information is not available to ensure that the proposed project would be designed to include the required number of EV Ready spaces. Therefore, compliance with BMP-2 would be ensured by Mitigation Measure 4.3-7(c).

| Table 4.3-16 EV Parking Space Requirements for Nonresidential Land Uses | | |
|--|--|---|
| Total Number of Actual Parking Spaces | Tier 2 Number of Required EV Capable Spaces | Tier 2 Number of EVCS (EV Capable Spaces Provided with EVSE)² |
| 0-9 | 3 | 0 |
| 10-25 | 8 | 3 |
| 26-50 | 17 | 6 |
| 51-75 | 28 | 9 |
| 76-100 | 40 | 13 |
| 101-150 | 57 | 19 |
| 151-200 | 79 | 26 |
| 201 and over | 45 percent of total parking spaces ¹ | 33 percent of EV capable spaces |
| ¹ The Calculation for spaces shall be rounded up to the nearest whole number. ² The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2. | | |
| Source: 2022 CalGreen Code (Table A5.106.5.3.2) | | |

BMP-3: No Net increase in Total VMT

Because the project is located within the jurisdiction of SMAQMD, the project is required to implement BMPs 1 and 2. However, even with implementation of BMPs 1 and 2, the project would still result in annual emissions over the SMAQMD’s threshold of significance and, therefore, would be subject to BMP 3.

As discussed in Chapter 4.12, Transportation, of this EIR, the proposed project does not include any retail uses in excess of 50,000 sf. Therefore, the highway commercial uses are considered to be local-serving retail, and consistent with OPR guidance, would result in a less-than-significant impact related to VMT. However, based on the SACOG SACSIM 19 travel demand model, the on-site industrial uses are anticipated to generate VMT



at 128 percent of the regional average, which is above the significance threshold established for the proposed project.

Therefore, the proposed project would be required to comply with Mitigation Measure 4.12-3, which requires that the owner/operator of on-site industrial building prepare and implement a VMT Reduction Plan to reduce VMT by at least 22 percent prior to the certificate of occupancy, consistent with the VMT Mitigation Memorandum prepared by the City's Public Works Department for the proposed project. As noted in Chapter 4.12, with implementation Mitigation Measure 4.12-3, the proposed project would achieve a 22 percent reduction in VMT to ensure that a net increase in total VMT would not occur as a result of the proposed project, and a less-than-significant impact would occur.

Based on the above, with implementation of Mitigation Measure 4.12-3, the proposed project would meet the requirements of an established local SB 743 target, which would ensure the proposed project would comply with BMP-3.

Consistency with City of Sacramento CAAP

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

Measure E-2 of the CAAP encourages the elimination of natural gas in new construction. As required by Mitigation Measure 4.3-7(b), the proposed project would be designed such that all project components, with the exception of the on-site restaurant kitchens, are built all-electric. The kitchens would be required to include pre-wiring to allow for the future retrofit of all natural gas appliances with all-electric appliances, and if natural gas is installed in the kitchens, the project applicant would be required to reduce GHG emissions associated with on-site restaurant kitchens at a rate of 158.77 MTCO₂e/yr. Therefore, the proposed project would generally be consistent with Measure E-2 of the CAAP.

In addition, as discussed in Chapter 4.12, Transportation, of this EIR, Mitigation Measure 4.12-2 would require that the proposed project implement new bicycle and pedestrian improvements along the project frontage, in compliance with City standards. In addition, all internal roadways and associated bicycle and pedestrian improvements would be constructed in conformance with City standards. As such, the proposed project would generally comply with Action TR-1.2 of the CAAP. Furthermore, as required by Mitigation Measure 4.3-7(c), the project would provide 1,652 EV Ready spaces, and 545 spaces with EVSE. As such, the proposed project



would comply with Section 4.106.4 of the CALGreen Code, thus generally complying with Measure TR-3 of the CAAP.

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

Consistency with 2022 Scoping Plan

Appendix D to the CARB’s 2022 Scoping Plan provides examples of key project attributes that could be considered to assess a project’s compliance with the State’s 2030 GHG emissions reductions goals. Thus, general implementation of the suggested project attributes within the 2022 Scoping Plan would be considered to demonstrate the project’s compliance with SB 32. The project’s consistency with the key attributes within the 2022 Scoping Plan is assessed in Table 4.3-17 below.

| Table 4.3-17 Project Consistency with the 2022 Scoping Plan | |
|--|---|
| Key Project Attributes | Consistency Discussion |
| Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval. | Consistent with SMAQMD BMP-2, as discussed above, the proposed project would provide EV Ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces (see Table 4.3-16). Compliance with BMP-2 would be ensured by Mitigation Measure 4.3-2(c). |
| Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer). | The project site is bound to the north by I-5 and to the east by the City of Sacramento. The site is currently undeveloped, and a portion of Bayou Way is located within the project site, which is generally laid out in an east-to-west direction. Surrounding existing land uses include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5. It should also be noted that the approved Sacramento International Airport Master Plan is located to the northwest of the project site, and the proposed SWIFT Project is located adjacent to the project site’s western boundary. Therefore, the proposed project would develop the site with urban uses consistent with the existing and planned uses in the project vicinity. The project would |



| Table 4.3-17 Project Consistency with the 2022 Scoping Plan | |
|--|--|
| Key Project Attributes | Consistency Discussion |
| | also include the development of additional roadways throughout the project site. |
| Does not result in the loss or conversion of natural and working lands. | As discussed in Chapter 4.2, Agricultural Resources, of this EIR, the existing land uses within the Development Area are predominantly agricultural and appears to contain active farmland, including approximately 31.3 acres of Prime Farmland and approximately 12.1 acres of Farmland of Statewide Importance. Thus, the proposed project would result in the conversion of farmland to non-agricultural uses. Nonetheless, as discussed in Chapter 4.4, Biological Resources, of this EIR, portions of the project site are located within the Natomas Basin Habitat Conservation Plan (HCP) policy area boundaries. As discussed therein, the proposed project would be subject to applicable fees for the conversion of habitat to urban uses. As such, in compliance with Natomas Basin HCP requirements, the proposed project would be required to identify appropriate lands to be set aside in permanent conservation easement at a ratio of 0.5 Farmland acre located within the Natomas Basin HCP policy area converted to urban land uses to one acre of habitat preserved. Therefore, although the proposed project would involve the conversion of farmland to non-agricultural uses, through compliance with Natomas Basin HCP requirements, other farmland would be preserved elsewhere. |
| <p>Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or</p> <p>Is in proximity to existing transit stops (within a half mile), or</p> <p>Satisfies more detailed and stringent criteria specified in the region's SCS.</p> | <p>The proposed project is industrial in nature and does not include any residential development. Therefore, the first criterion of this key project attribute is not applicable to the proposed project.</p> <p>As discussed in Chapter 4.12, Transportation, of this EIR, the closest transit stop to the project site is a Sacramento Regional Transit (SacRT) stop located north of the project site. However, the existing stop is located more than 0.5-mile from the site. Therefore, the proposed project is not within a half mile of an existing transit stop.</p> <p>As further discussed in Chapter 4.12, the proposed project does not include any retail uses in excess of 50,000 sf. Therefore, the</p> |



| Table 4.3-17 Project Consistency with the 2022 Scoping Plan | |
|--|--|
| Key Project Attributes | Consistency Discussion |
| | <p>highway commercial uses are considered to be local-serving retail, and consistent with OPR guidance, would result in a less-than-significant impact related to VMT. However, based on the SACOG SACSIM 19 travel demand model, the on-site industrial uses are anticipated to generate VMT at 128 percent of the regional average, which is above the significance threshold established for the proposed project. Therefore, the proposed project would be required to comply with Mitigation Measure 4.12-3, which requires that the owner/operator of on-site industrial building prepare and implement a VMT Reduction Plan to reduce VMT by at least 22 percent prior to the certificate of occupancy, consistent with the VMT Mitigation Memorandum prepared by the City's Public Works Department for the proposed project. As noted in Chapter 4.12, with implementation Mitigation Measure 4.12-3, the proposed project would achieve a 22 percent reduction in VMT, and a less-than-significant impact would occur.</p> <p>Therefore, compliance with Mitigation Measure 4.12-3 would ensure that the proposed project would not preclude implementation of the transportation goals included in the SACOG MTP/SCS.</p> |
| <p>Reduces parking requirements by:</p> <ul style="list-style-type: none"> • Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); <u>or</u> • Providing residential parking supply at a ratio of less than one parking space per dwelling unit; <u>or</u> • For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. | <p>The proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, as well as approximately 98,200 sf of retail/highway commercial uses on approximately 13.4 acres of the site. As such, the proposed project does not include the development of residential uses, and this key project attribute would not be applicable to the proposed project.</p> |
| <p>At least 20 percent of units included are affordable to lower-income residents.</p> | <p>The proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, as well as approximately 98,200 sf of retail/highway commercial uses on approximately 13.4 acres of the site. As such, the proposed project does not include</p> |



| Table 4.3-17 Project Consistency with the 2022 Scoping Plan | |
|--|---|
| Key Project Attributes | Consistency Discussion |
| | the development of residential uses, and this key project attribute would not be applicable to the proposed project. |
| Results in no net loss of existing affordable units. | The project site does not currently include any affordable housing units. Therefore, the proposed project would not result in a net loss of existing affordable units. |
| Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking. | As discussed above, in order to be consistent with SMAQMD BMP 1, the proposed project is required to include all electric appliances and plumbing. However, project specific information is not available to ensure that the proposed project would be designed and constructed without natural gas infrastructure. In addition, the complete prohibition of natural gas may be infeasible for the proposed project, as natural gas is anticipated to be used for cooking appliances in the proposed restaurant uses associated with the on-site highway commercial portion of the proposed project. All other components of the proposed project, including any space heating and HVAC systems on-site, would be required to be electric with implementation of Mitigation Measure 4.3-7(b). Furthermore, pursuant to SMAQMD's Guidance, BMP-1 may be replaced with an alternative mitigation strategy that would reduce GHG to the same extent. As such, compliance with BMP-1 through the equivalent reduction in GHG emissions would be ensured by Mitigation Measure 4.3-7(b). |
| Source: California Air Resources Board. 2022 Scoping Plan [Appendix D]. December 2022. | |

As shown in Table 4.3-17 the proposed project would generally comply with the applicable suggested project attributes included in the 2022 Scoping Plan. Because the 2022 Scoping Plan is the CARB's strategy for meeting the State's 2030 emissions goals established by SB 32, the project would not be considered to conflict with SB 32.

Conclusion

Based on the analysis presented above, the proposed project would generally comply with the applicable suggested project attributes included in the 2022 Scoping Plan. However, the proposed project would exceed SMAQMD's 1,100 MTCO₂e/yr threshold of significance during construction. In addition, compliance with the SMAQMD BMPs cannot be ensured at this time. Thus, the proposed project could be considered to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation



adopted for the purpose of reducing the emissions of GHGs. Consequently, the project could result in a cumulatively considerable incremental contribution to GHG emissions or climate change and the project's impact would be **significant**.

Mitigation Measure(s)

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

Construction

4.3-7(a) *Prior to the initiation of construction of the industrial park, the project applicant shall demonstrate that construction-related GHG emissions would be reduced to 935 MTCO₂e/yr and shall submit proof to the City of Sacramento Community Development Department. In addition, prior to the initiation of construction of the nonparticipating parcels, the future applicant of all future development proposals on such parcels shall demonstrate that construction-related GHG emissions would be reduced to 165 MTCO₂e/yr and shall submit proof to the City of Sacramento Community Development Department.*

Construction-related GHG emissions can be reduced through several options. The SMAQMD recommends the following options for reducing greenhouse gas emission from construction projects:

- *Modify the construction schedule to reduce the intensity of construction to lower emissions;*
- *Ensure that phases of development do not overlap;*
- *Use of renewable diesel for construction fuel rather than diesel;*
- *Improve fuel efficiency from construction equipment by:*
 - *Minimizing idling time either by shutting equipment off when not in use or reducing the time of idling to no more than three minutes (five-minute limit is required by the state airborne toxics control measure [Title 13, sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site; and*
 - *Using equipment with new technologies (repowered engines, electric drive trains).*
- *Perform on-site emission reductions such as implementing on-site material hauling with trucks equipped with on-road engines (if determined to be less emissive than the off-road engines) or real, quantifiable, permanent, verifiable, and enforceable on-site emission reductions;*
- *Use alternative fuels for generators at construction sites such as propane or solar, or use electrical power;*
- *Use a CARB-approved low carbon fuel for construction equipment; (NO_x emissions from the use of low carbon fuel must be reviewed and increases mitigated.)*
- *Encourage and provide carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes;*



- Reduce electricity use in the construction office by using LED bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones;
- Recycle or salvage non-hazardous construction and demolition debris (goal of at least 75 percent by weight);
- Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products utilized should be certified through a sustainable forestry program;
- Minimize the amount of concrete for paved surfaces or utilize a low carbon concrete option;
- Produce concrete on-site if determined to be less emissive than transporting ready mix;
- Use SmartWay certified trucks for deliveries and equipment transport; and
- Develop a plan to efficiently use water for adequate dust control.

The project applicant may elect to implement any combination of the foregoing measures to reduce construction-related GHG emissions. All GHG emissions reductions must be quantified. Compliance with the aforementioned measures shall be ensured by the City of Sacramento Community Development Department.

If the quantified reduction measures do not reduce construction-related GHG emissions to below 935 MTCO₂e/yr for the industrial park and 165, MTCO₂e/yr for the nonparticipating parcels, offsite carbon credits may be purchased to make up the difference. The purchase of off-site mitigation credits shall be negotiated with the City and SMAQMD at the time that credits are sought. Off-site mitigation credits shall be real, quantifiable, permanent, verifiable, enforceable, and additional, consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). The offsets shall be retired, and emissions must be offset through the year 2045. Such credits shall be based on CARB-approved protocols that are consistent with the criteria set forth in subdivision (a) of Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by the City of Sacramento and/or the SMAQMD. Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) any registry established by SMAQMD.

Operations

- 4.3-7(b) Prior to the approval of any building permits, the applicant shall implement the following measures:



1. *The proposed project shall be designed such that all project components, with the exception of the on-site restaurant kitchens, are built all-electric. The kitchens shall include pre-wiring to allow for the future retrofit of all natural gas appliances with all-electric appliances. If the kitchens are electrically powered and do not use natural gas, further mitigation is not required; and*
2. *If natural gas is installed in the kitchens, the applicant shall reduce GHG emissions associated with on-site restaurant kitchens at a rate of 158.77 MTCO₂e/yr through any combination of the following on-site mitigation options:*
 - *Requiring on-site renewable energy generation in excess of Code requirements.*
 - *Increasing the number of EV charging stations.*
 - *Constructing on-site or fund off-site carbon sequestration projects (such as tree plantings or reforestation projects).*
 - *Implementing a Transportation Demand Management Program.*
 - *Should new and quantifiable GHG emission reduction technology become available, the applicant may otherwise achieve the required GHG emissions reduction through other means, subject to review and approval by the City of Sacramento and the SMAQMD.*

The project applicant may elect to implement any combination of the foregoing measures to reduce operational GHG emissions. All GHG emissions reductions must be quantified.

If it is determined that the above on-site mitigation options are not sufficient to achieve the required GHG reduction, subject to the discretion of the City of Sacramento and the SMAQMD, off-site carbon credits may be purchased to make up the difference. The purchase of off-site mitigation credits shall be negotiated with the City and SMAQMD at the time that credits are sought. Off-site mitigation credits shall be real, quantifiable, permanent, verifiable, enforceable, and additional, consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). The offsets shall be retired, and emissions must be offset through the year 2045. Such credits shall be based on CARB-approved protocols that are consistent with the criteria set forth in subdivision (a) of Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by the City of Sacramento and/or the SMAQMD. Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry



under the California Cap and Trade program; or (iii) any registry established by SMAQMD.

Compliance with the aforementioned measures shall be ensured by the City of Sacramento Community Development Department.

4.3-7(c) Consistent with SMAQMD's GHG BMP-2, prior to the approval of project improvement plans, the applicant shall indicate that EV Ready parking spaces shall be installed throughout the project site at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces. Compliance with this measure shall be ensured by the City of Sacramento Community Development Department.

4.3-7(d) Implement Mitigation Measure 4.12-3.

4.3-8 Result in a cumulatively considerable inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency. Based on the analysis below, the impact is less than significant.

The following discussion applies to the potential for both project components to result in a cumulatively considerable inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Impact 4.3-5 discusses the consumption of energy on a project level, within the context of existing State plans and regulations. As discussed previously, the project would involve consumption of diesel, gasoline, and electricity throughout construction and operations. However, all proposed structures would be built in compliance with existing statewide mandatory energy efficiency standards, such as those contained in the California Building Energy Efficiency Standards and the CALGreen Code. Compliance with the energy efficiency standards would reduce the amount of electricity consumed by the proposed development. State regulations would also help to reduce the amount of energy consumed by on-road vehicles over time. For instance, State and federal emissions standards and fuel economy standards result in increased fuel efficiency for on-road vehicles. Overall, as concluded above, the proposed project would result in a less-than-significant impact related to the inefficient or wasteful use of energy or conflicting with a State or local plan for renewable energy or energy efficiency. Furthermore, a minimum of 184 EV charging stations would be required to be implemented within the project site, as required by the 2022 CBSC, which would help to further reduce transportation energy use associated with the proposed project.

Similar to the proposed project, all future development within the City of Sacramento would be required to comply with applicable State and local regulations related to energy efficiency. Increased efficiency would be ensured in the future as cumulative development occurs due to compliance with the State's robust energy efficiency requirements. For example, pursuant to 2022 CBSC, new non-residential buildings



associated with cumulative development would be required to be solar ready. Furthermore, energy efficiency regulations have been getting progressively more stringent over time. Thus, as cumulative development occurs under the increasingly stringent regulations, the energy use associated with such cumulative development is anticipated to be increasingly energy efficient over time as well.

Based on the above, implementation of the project in combination with other cumulative development in the project region would not result in the wasteful or inefficient use of energy. Because the project would not conflict with a local plan to increase energy efficiency and reduce energy consumption, a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.



4.4 BIOLOGICAL RESOURCES

4.4 BIOLOGICAL RESOURCES

4.4.1 INTRODUCTION

This chapter of the EIR evaluates the biological resources known to occur or that could potentially occur within the project site and surrounding environs. The chapter describes the proposed project's potential impacts to biological resources and identifies measures to eliminate or substantially reduce impacts to a less-than-significant level. Existing plant communities, wetlands, wildlife habitats, and potential for special-status species and communities are discussed for the project region. The information contained in the analysis is primarily based on a Biological Resources Assessment (BRA) (see Appendix E of this EIR)¹ and Aquatic Resources Delineation (ARD) Report (see Appendix F of this EIR)² prepared for the proposed project by Bargas Environmental Consulting (Bargas). Further information was sourced from the City of Sacramento 2040 General Plan,³ the City of Sacramento 2040 Master EIR (MEIR),⁴ and the Natomas Basin Habitat Conservation Plan (HCP).⁵

The project site, as defined by this EIR, consists of 474.4 acres located to the southeast of the intersection of Interstate 5 (I-5) and Power Line Road. The project site includes the industrial park footprint and several nonparticipating parcels that would not be developed as part of the proposed project, but would receive first-tier entitlements for future industrial uses and would be annexed into the City. In addition, a portion of right-of-way (ROW) under the jurisdiction of the California Department of Transportation (Caltrans) is within the project site.

As discussed further in the Method of Analysis subsection of this chapter, the entire 474.4-acre project site was evaluated at an appropriate level as part of the BRA.⁶ The BRA identifies the project site through the use of various terms (i.e., Biological Study Area [study area], Annexation Area, and Regional Study Area). The foregoing terms are applied to the project site within the BRA, based on the specific area of the site being discussed (see Figure 4.4-1). Further information on the terminology used in the BRA and the acreage surveyed as part of the BRA is provided in the Method of Analysis subsection below.

4.4.2 EXISTING ENVIRONMENTAL SETTING

The following sections describe the existing environmental setting and biological resources occurring in the proposed project region and project site.

¹ Bargas Environmental Consulting. *Biological Resources Assessment, Airport South Industrial Park, Sacramento County, California*. January 2023.

² Bargas Environmental Consulting. *Aquatic Resources Delineation, Airport South Industrial Park, Sacramento County, California*. September 2022.

³ City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

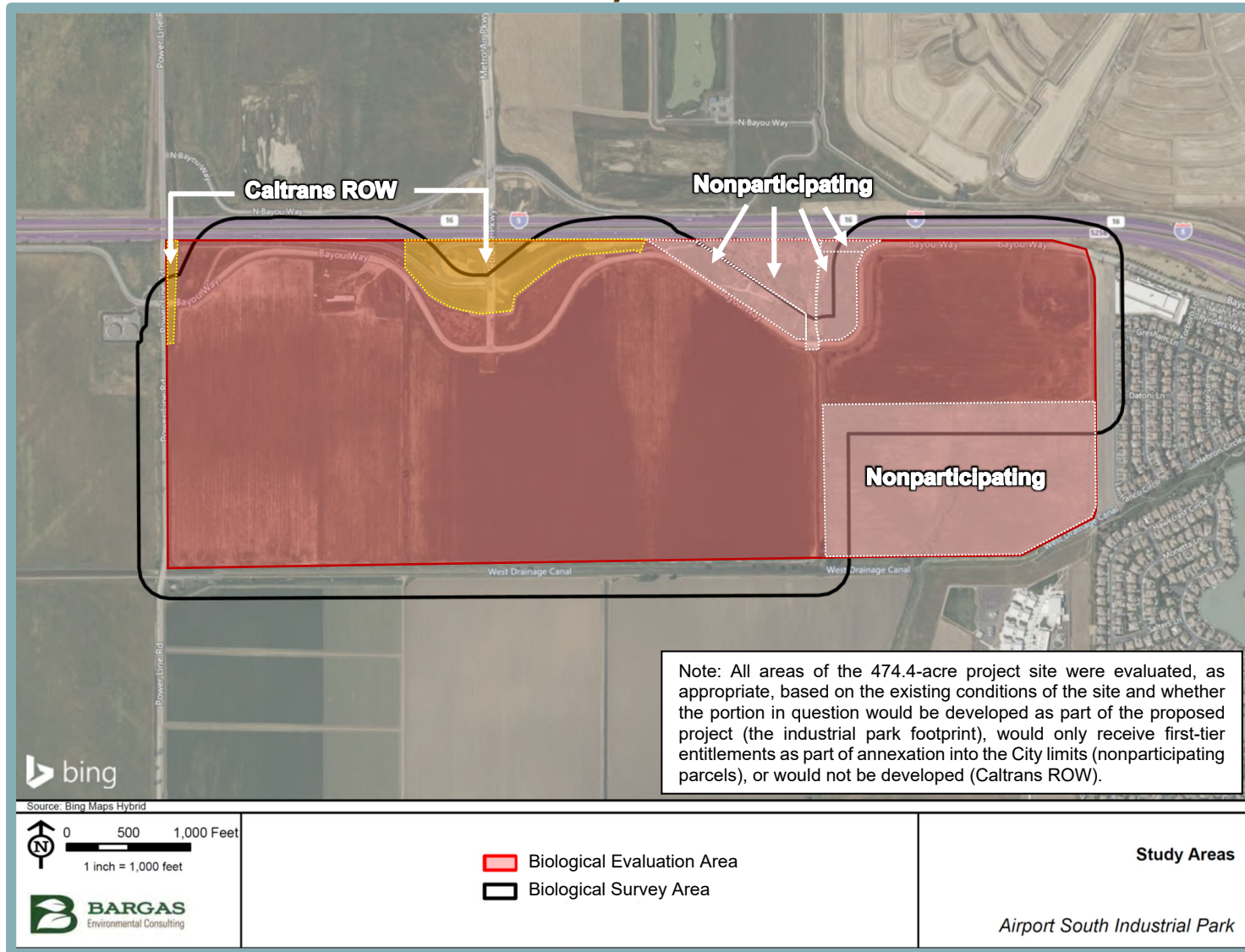
⁴ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.

⁵ The Natomas Basin Conservancy. *Natomas Basin Habitat Conservation Plan*. Revised 2003.

⁶ Note: All areas of the 474.4-acre project site were evaluated, as appropriate, based on the existing conditions of the site and whether the portion in question: (i) would be developed as part of the proposed project (the industrial park footprint), (ii) would only receive first-tier entitlements as part of annexation into the City limits (nonparticipating parcels), or (iii) would not be developed (Caltrans ROW).



**Figure 4.4-1
 Study Areas**



Regional Setting

The project site is located southeast of the I-5/Power Line Road intersection, within the Natomas Basin, in a currently unincorporated portion of Sacramento County, California. The Natomas Basin is a low-lying area in the Sacramento Valley, located east of the Sacramento River and north of the river's confluence with the American River. Of the 36,656 acres within the Natomas Basin, 23,820 are within the jurisdiction of unincorporated Sacramento County and 12,836 acres lie within the City of Sacramento.

Prior to modern reclamation efforts, drainage off the western slopes of the Sierra Nevada produced regular flooding and created the Natomas Basin as an area of highly fertile, alluvial sands. Early conditions within the basin consisted of various lakes, a large extent of riparian scrub-shrub (e.g., willows), and a large expanse of dry-farmed open plain. However, since 1914, land reclamation and reclamation facilities, canals, levees, and pumping stations have resulted in the conversion of more than 80 percent of the Natomas Basin to agricultural production. A high proportion of the soils in the basin are underlain by impervious clay, which creates poor drainage conditions that favor irrigated rice farming – a regional agricultural use that has been prevalent since the 1940s.

The predominant crops produced in the Natomas Basin are rice, corn, grain, tomatoes, and pasture lands. The overall topography of the basin remains that of a shallow bowl, but the irregular small-scale topographic features of the original landscape have largely been eliminated by agriculture. The current drainage pattern of the basin has been altered so that stormwater runoff is pumped into the surrounding canals and the Sacramento River at several locations. Even with the pumping, portions of the basin are subject to shallow flooding from rainfall that cannot be conveyed quickly enough to external drainage systems. Natural and uncultivated vegetation types are interspersed throughout the agricultural areas of the basin. Natural vegetation is found primarily along irrigation canals, drainage ditches, pastures, and uncultivated fields. Borders of canals and ditches often have narrow strips of emergent vegetation (e.g., cattails and bulrushes) or wooded riparian areas. The presence of water conveyance systems among the mosaic of agricultural fields and riparian areas provides important nesting, feeding, and migration corridor habitat for a variety of wildlife species that inhabit the Natomas Basin.

Project Setting

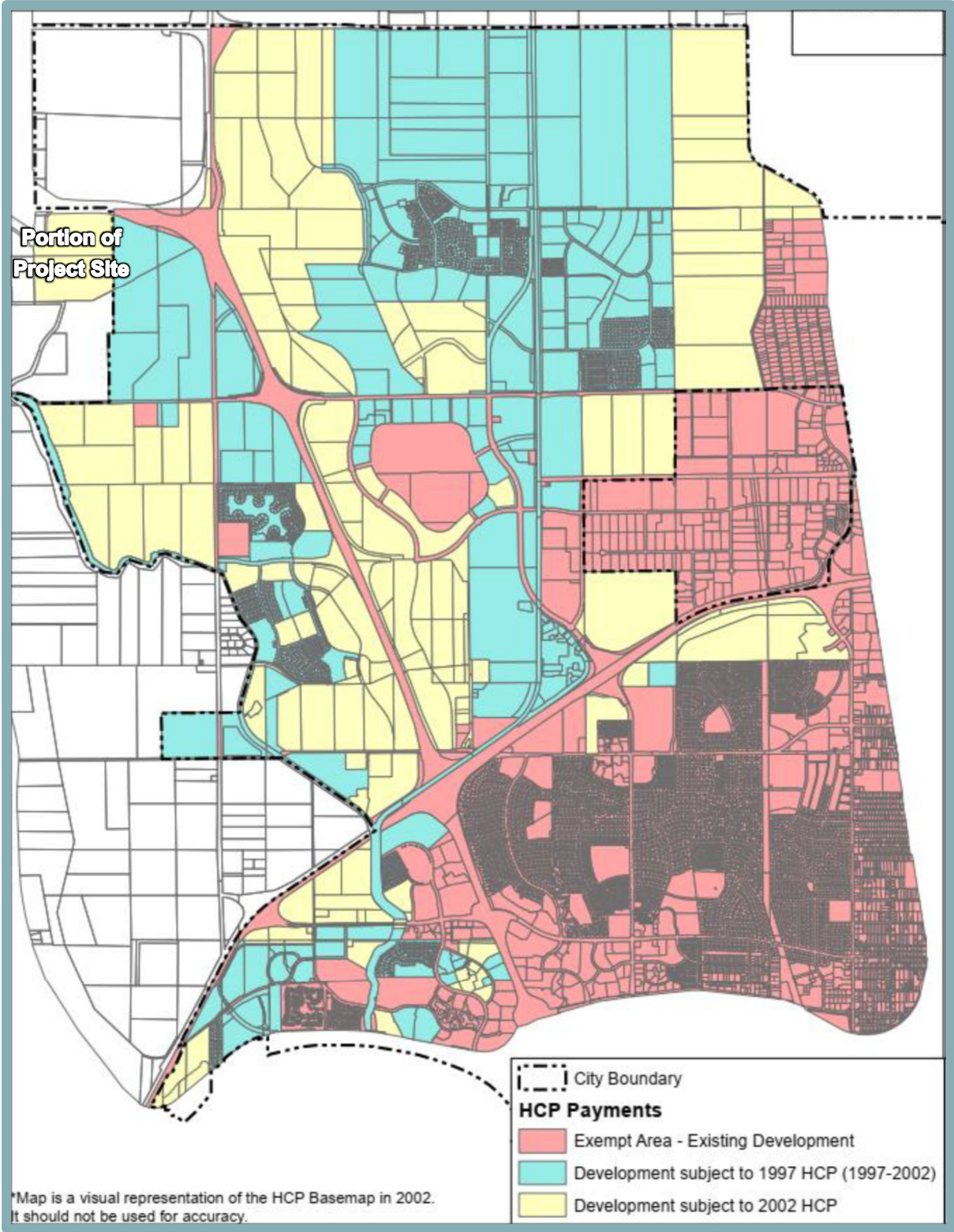
The project site is bounded by I-5 to the north, a fire break along Lanfranco Circle to the east, the West Drainage Canal and an unpaved road to the south, and Power Line Road to the west, which is paved and features two vehicle lanes. Within the northern portion of the site, Bayou Way, a paved road consisting of two vehicle lanes, meanders in a west-to-east direction through the site. The site was historically used as hay fields, with possible intermittent rice fields from 1937 until at least 2020. Currently, the site consists of vacant, fallow agricultural land. As of July 27, 2023, a portion of the site (Assessor's Parcel Numbers 225-0030-023 and 225-0030-045) is within the Natomas Basin HCP permit area (see Figure 4.4-2).⁷

The project site, relatively flat, features a ground surface elevation approximately 17 feet above mean sea level (amsl). The lands within the site are currently devoid of structures and primarily composed of fallowed agricultural fields, with some undeveloped land present within and adjacent to the road and the I-5 ROW along the site's northern boundary.

⁷ California Department of Fish and Wildlife. *Response to Request for Revision pursuant to Section VI.L.3(2) of the 2003 Natomas Basin Habitat Conservation Plan (NBHCP) to clarify the City of Sacramento's Permit Area Boundary*. July 27, 2023.



**Figure 4.4-2
Natomas Basin Habitat Conservation Plan 2023 Permit Area**



As discussed further below, various vegetation communities occur on-site. In addition, unnamed drainage canals proceed through the site generally in a north-to-south direction in both the site's western and eastern portions. Unimproved dirt roads provide access to the interior of the project site, which is subdivided into multiple agricultural plots. The site is surrounded by vacant fields to the north, across I-5, and west, active agricultural fields and the Paso Verde K-8 School to the south, and the Westlake Subdivision residential community to the east. Portions of the project site adjacent to I-5 have been previously disturbed as part of construction of the I-5/Metro Air Parkway interchange. Potential impacts to biological resources in such areas have already been mitigated by Caltrans and/or the Metro Air Park and would not require additional mitigation by the proposed project.

Terrestrial Plant Communities

According to the BRA, 11 habitat types exist within the study area, including perennial rye grass fields, upland mustards or star-thistle fields, developed/disturbed land covers, open water, unknown row crops, poison hemlock or fennel patches, Himalayan blackberry – rattlebox – edible fig riparian scrub, Goodding's willow – red willow riparian woodland and forest, valley oak riparian forest woodland, hardstem and California bulrush marsh, and cattail marsh. The terrestrial land cover types in the study area are summarized below.

Perennial Rye Grass Fields

Perennial rye grass fields (*Lolium perenne* [now *Festuca perennis*], Herbaceous Semi-Natural Alliance) occur within the project site. Historic aerial imagery and field observations suggest the vegetation may be managed in the foregoing areas through mowing or shallow tilling for fire fuel abatement. The vegetation community was observed within two large fallowed agricultural fields, as well as in lower topographical roadside areas that receive sheet-flow stormwater runoff from roads, including areas to the west and east of the Metro Air Park north of I-5, and Ditch-2 (discussed further in the Aquatic Resources subsection). The dominant plant species observed in the foregoing areas was rye grass, with smaller amounts of the following species: perennial pepperweed (*Lepidium latifolium*), ripgut grass, little-seeded canary grass (*Phalaris minor*), and Johnson grass.

Upland Mustards or Star-Thistle Fields

Upland mustards or star-thistle fields (*Brassica nigra* – *Centaurea* [*solstitialis*, *melitensis*], Herbaceous Semi-Natural Alliance) occur within the project site. Historic aerial imagery and field observations suggest the vegetation may be managed through mowing or shallow tilling for fire fuel abatement. The vegetation community was observed within one large fallowed agricultural field and most roadside areas. The dominant plants species observed in the foregoing areas include black mustard, jointed charlock (*Raphanus raphanistrum*), little mallow (*Malva parviflora*), bristly ox-tongue, and ripgut grass.

Developed/Disturbed

Developed/disturbed land cover occurs within the project site. Several paved roads transect the study area, including Power Line Road, Bayou Way, I-5, and an irrigation district access road. Bayou Way transects the northern end of the project site and the southern end of Metro Air Parkway terminates at Bayou Way within the project site's boundaries. A paved irrigation district access road also transects the northern end of the site along the south side of Ditch-2, between Bayou Way and I-5. The areas described above are best described as developed. In addition, the following areas are best described as disturbed: gravel road shoulders adjacent to paved roads, an unpaved farm road south of Canal-3 (discussed further in the Aquatic Resources subsection),



a construction yard on the south side of Bayou Way to the west of Metro Air Park, and a fire break and unpaved fire road along the east side of the study area.

Open Water

Open water in the form of canals and ditches is found on portions of the project site. These areas include aquatic features Canal-1, Canal-2, Canal-3, and Ditch-2, which were mapped during the formal ARD. The four features were observed to be inundated and lacking significant amounts of living emergent vegetation during most of the surveys.

Unknown Row Crops

Unknown row crop land cover occurs on the agricultural field south of Canal-3 and adjacent to Power Line Road. The species being cultivated and plant species otherwise present within the field are unknown.

Poison Hemlock or Fennel Patches

Poison hemlock or fennel patches (*Conium maculatum* – *Foeniculum vulgare*, Herbaceous Semi-Natural Alliance) are found within the project site. Historic aerial imagery and field observations suggest the vegetation in the foregoing areas may not be regularly managed for fire fuel abatement, due to their locations along the corners or edges of fields. The dominant plant species observed in the poison hemlock or fennel patches include poison hemlock, fennel, milk thistle, wild teasel (*Dipsacus fullonum*), little mallow, and ripgut.

Himalayan Blackberry – Rattlebox – Edible Fig Riparian Scrub

Himalayan blackberry – rattlebox – edible fig riparian scrub (*Rubus armeniacus* - *Sesbania punicea* – *Ficus carica*, Shrubland Semi-Natural Alliance) is found on the project site. The community is present in large patches along Ditch-1 and along a smaller ditch just outside of the southeastern project site boundary. The vegetation patches are predominantly composed of Himalayan blackberry, with smaller amounts of the following species also observed: western poison oak (*Toxicodendron diversilobum*), edible fig (*Ficus carica*), wild teasel, poison hemlock, and fennel.

Goodding's Willow – Red Willow Riparian Woodland and Forest

Goodding's willow – red willow riparian woodland and forest (*Salix gooddingii* – *Salix laevigata*, Forest and Woodland Alliance) can be found adjacent to the south bank of Canal-2, where the community turns east and follows parallel to Bayou Way, and along a ditch on the north side of Bayou Way. The trees are all of a single species, Goodding's willow, and range in height from approximately 15 to 25 feet. Himalayan blackberry, common tule, tall flatsedge, curly dock, and Johnson grass are present in the understory along the ditch. Other parts of the understory are characterized by weedy species more typical of the perennial rye grass field, upland mustards and star-thistle fields, and poison hemlock or fennel patch communities previously discussed above.

Valley Oak Riparian Forest Woodland

Valley oak riparian forest woodland (*Quercus lobata*, Riparian Forest and Woodland Alliance) is present within and adjacent to both banks of Canal-2 where it meets Canal-3 on the southern side of the study area. Several small groves of trees are also present along both banks of Canal-3 to the west of Canal-2. The trees are all of a single species, Valley Oak (*Quercus lobata*), and range in height from approximately 15 to 40 feet tall. Many of the trees are rooted within the bank and are failing as the bank erodes into the canal. The understory is characterized by weedy species



more typical of the Perennial Rye Grass Field, Upland Mustards and Star-thistle Field, and Poison Hemlock or Fennel Patch communities described in the sections above.

Hardstem and California Bulrush Marsh

Hardstem and California bulrush marsh (*Schoenoplectus [acutus, californicus]*, Herbaceous Alliance) is found on the project site. The dominant plant species observed include common tule, tall flatsedge, curly dock, Johnson grass, and bristly ox-tongue. A few Fremont cottonwood (*Populus fremonti*) trees, ranging in height from approximately 15 to 30 feet, are present and rooted within or adjacent to Ditch-1 where the hardstem and California bulrush marsh community occurs.

Cattail Marsh

The southern portion of Ditch-1 widens just north of where the ditch discharges to the West Drainage Canal and contains two patches of cattail marsh (*Typha [angustifolia, domingensis, latifolia]*, Herbaceous Alliance). The areas are dominated by cattail species (*Typha* sp.), with smaller amounts of common tule.

Sensitive Vegetation Communities

The California Department of Fish and Wildlife (CDFW) evaluates Natural Communities using NatureServe's Heritage Methodology, which is the same system used to assign global and State rarity ranks for plant and animal species in the California Natural Diversity Database (CNDDDB). Threat scope (typically assessed within a 20-year timeframe for vegetation) and severity are used to calculate an overall threat score, which is added to the overall rarity score for a single rank of 1 through 5. Evaluation is done at both the global (full natural range within and outside of California) and State (within California) levels, resulting in a single global (G) and State (S) rank that ranges from 1 (very rare and threatened) to 5 (demonstrably secure). Natural Communities with ranks of S1 to S3 are considered Sensitive Natural Communities and must be addressed in the CEQA environmental review processes.

The following vegetation communities identified within the study area are designated by CDFW and the California Native Plant Society (CNPS) as Sensitive Natural Communities: Goodding's willow – red willow riparian woodland and forest, valley oak riparian forest woodland, and hardstem and California bulrush marsh. Goodding's willow – red willow riparian woodland and forest, as well as valley oak riparian forest woodland, are S3-ranked natural communities. Hardstem and California bulrush marsh is an S3/S4-ranked natural community.

In addition, the following additional Sensitive Natural Communities have been identified within the Regional Study Area, beyond the boundaries of the project site:

- Great Valley Cottonwood Riparian Forest: The nearest occurrence as recorded in the CNDDDB is more than four miles to the south of the study area along the Sacramento River. The community is not present within the study area or overall project site, based on aerial photography and surveys.
- Northern Claypan Vernal Pool: The only CNDDDB record for the community is four miles to the east of the study area along Dry Creek. The community is not present within the study area or overall project site, based on aerial photography and surveys.



Aquatic Resources

Pursuant to the ARD, a total of 2.018 acres of potential jurisdictional tributary drainages and other waters of the U.S. were identified within the project site in accordance with the minimum standards set forth by the U.S. Army Corps of Engineers (USACE) South Pacific Division and Sacramento District Regulatory Program, as well as the Corps of Engineers Wetlands Delineation Manual, Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (see Figure 4.4-3).

The identified features are subject to the interpretation and verification of the USACE Sacramento District Regulatory Division. Table 4.4-1 summarizes the aquatic features, which are discussed further below.

| Table 4.4-1 Aquatic Features Observed in the Project Site | | |
|--|--------------|----------------------|
| Feature Name | Area (acres) | Length (linear feet) |
| Tributary Drainages | | |
| Canal-1 | 0.04 | 2,149 |
| Canal-2 | 1.46 | 3,204 |
| Canal-3 | 0.001 | 5,335 |
| Subtotal | 1.501 | 10,688 |
| Other Waters | | |
| Ditch-1 | 0.19 | 2,278 |
| Ditch-2 | 0.39 | 2,458 |
| Subtotal | 0.58 | 4,736 |
| Overall Total | 2.081 | 15,424 |
| <i>Source: Bargas Environmental Consulting, 2023.</i> | | |

Canal-1

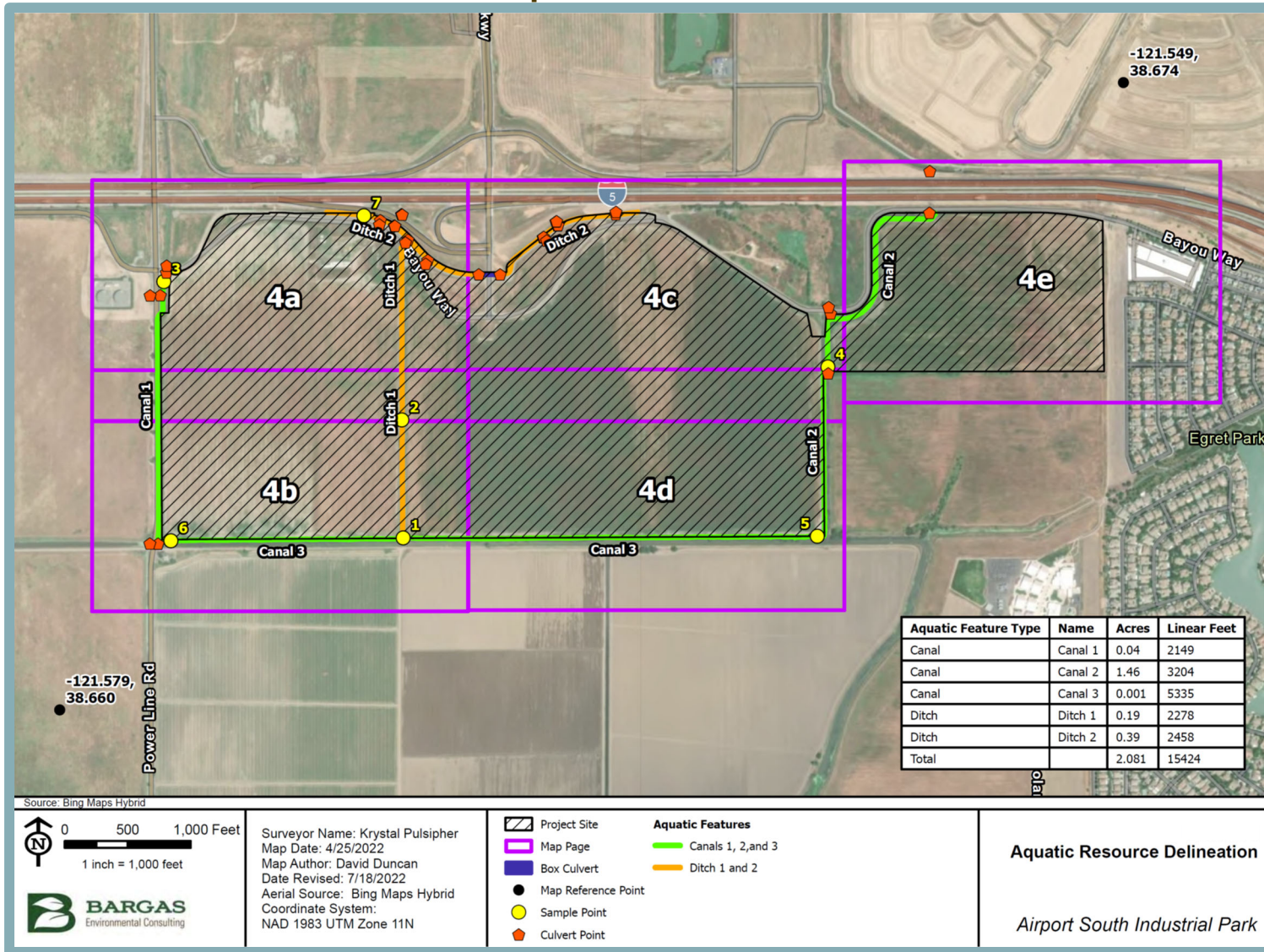
Canal-1 is a north-south-oriented, manmade drainage canal that partially overlaps the project site's western boundary. The canal's origin can be traced on the U.S. Geological Survey (USGS) topographic map and the Reclamation District (RD) 1000 facilities map as beginning within the Sacramento International Airport grounds, approximately two to three miles northwest of the project site. Canal-1 is a direct tributary to Canal-3 (West Drainage Canal), directly connecting at the southwest corner of the project site. The feature conveys stormwater and irrigation runoff collected in various small ditches and stormwater infrastructure in the project vicinity.

Canal-2

Canal-2 is a named feature, the Lone Tree Canal, and is a north-south-oriented, manmade drainage canal that transects the eastern third of the proposed industrial park footprint. The canal's origin can be traced on the USGS topographic map and the RD 1000 facilities map as beginning along Lone Tree Road, just north of West Elkhorn Boulevard, approximately two to three miles north of the industrial park footprint. Canal-2 is a direct tributary to Canal-3 (West Drainage Canal), directly connecting at the south boundary of the industrial park footprint. The feature conveys stormwater and irrigation runoff collected in various small ditches and stormwater infrastructure in the project vicinity.



**Figure 4.4-3
 Aquatic Resources**



Canal-3

Canal-3 is a named feature, the West Drainage Canal, and is a west-east-oriented, manmade drainage canal that partially overlaps the south boundary of the industrial park footprint. The canal's origin can be traced on the USGS topographic map and the RD 1000 facilities map as beginning along Elkhorn Boulevard east of Garden Highway, approximately three miles northwest of the industrial park footprint.

The canal receives water from several other smaller drainage canals that convey stormwater and irrigation runoff collected in various small ditches and stormwater infrastructure in the project vicinity. Flows are ultimately discharged to the Sacramento River in a controlled and managed way by way of several different pump stations.

Ditch-1

Ditch-1 is a north-south-oriented, manmade irrigation drainage ditch that transects the western third of the industrial park footprint, starting at Bayou Way on the canal's northern terminus and discharges to Canal-3 (West Drainage Canal) on its south terminus. The feature conveys excess irrigation water and stormwater runoff from the adjacent agricultural fields to Canal-3.

Ditch-2

Ditch-2 is an east-west-oriented, manmade drainage ditch that transects the northern edge of the industrial park footprint. The ditch starts outside of the industrial park footprint on the north side of Bayou Way, across the road from Canal-2, passes through the industrial park footprint, then ultimately discharges to an extension of Canal-1 outside of the footprint. The feature conveys stormwater runoff from the adjacent roads and uplands within the Caltrans I-5 fee title ROW to Canal-1.

Special-Status Species

Special-status species are species that have been listed as threatened or endangered under the federal Endangered Species Act (FESA), California Endangered Species Act (CESA), or are of special concern to federal resource agencies, the State, or private conservation organizations. A species may be considered to have special status due to declining populations, vulnerability to habitat change, or restricted distributions. A general description of the criteria and laws pertaining to special-status classifications is described below. Special-status plant and wildlife species may meet one or more of the following criteria:

- Listed as threatened or endangered, or proposed or candidates for listing by the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS);
- Listed as threatened or endangered and candidates for listing by the CDFW;
- Identified as Fully Protected species or Species of Special Concern by CDFW;
- Plant species considered to be rare, threatened, or endangered in California by the CNPS and CDFW (California Rare Plant Rank [CRPR] 1, 2, and 3):
 - CRPR 1A: Plants presumed extinct.
 - CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere.
 - CRPR 2A: Plants extirpated in California, but common elsewhere.
 - CRPR 2B: Plants rare, threatened, or endangered in California, but more common elsewhere.
 - CRPR 3: Plants about which the CNPS needs more information.



Listed and Special-Status Plant Species

According to the records search conducted as part of the BRA, 20 special-status plant species have the potential to occur in the Regional Study Area. Biological conditions (i.e., vegetation communities, wildlife habitats, disturbances, etc.) and the habitat and life cycle requirements of special-status species identified for analysis in the records search were considered. Additionally, the BRA defined “recent” occurrences as species observed within the past 30 years. Based on such considerations, species were assigned to the following categories:

- **Present**: Species is known to occur in the project site, based on recent surveys, CNDDDB records (within 30 years), or other records;
- **High**: Species with known recent recorded occurrences/populations near the project site and highly suitable habitat occurs within the project site. Highly suitable habitat includes all necessary elements to support the species (e.g., elevation, hydrology, soils, cover, habitat type, food resources);
- **Moderate**: Species with known recent recorded occurrences/populations near the project site; however, habitat within the project site has been moderately disturbed, fragmented, or is small in extent. Moderately suitable habitat includes several elements to support the species (e.g., elevation, hydrology, soils, cover, habitat type, food resources). Furthermore, moderately suitable habitat may also be located at the edge of the species’ range, or occurrences have not been reported nearby;
- **Low**: Species with few known recent recorded occurrences/populations near the project site and habitat within the project site is highly disturbed or extremely limited. A low potential is assigned to annual or perennial plant species that may have been detectable during a focused survey in the appropriate blooming period but was not found; however, small populations or scattered individuals are still considered to have a low potential to occur. Additionally, species for which poor-quality habitat may support the species within the project site, but the reported extant range is far outside the study area and/or any species observations are anticipated to be migratory (i.e., not likely to reproduce within the study area); and
- **Presumed Absent/No Potential**: Focused surveys were conducted and the species was not detected, or the species was found in the literature review, but suitable habitat (soil, vegetation, elevational range) was not found in the project site or the project site is not within the known geographic range of the species.

Based on focused field surveys and literature review (detailed further in this chapter under the Method of Analysis subsection), the following six plant species were determined to have *low* potential for occurrence within the study area: pappose tarplant, Heckard’s pepper-grass, San Joaquin spearscale, woolly rose-mallow, palmate-bracted bird’s beak, and Sanford’s arrowhead. Further details on all identified 20 plant species is provided in Table 4.4-2.

Listed and Special-Status Wildlife Species

According to the records search conducted as part of the BRA, 28 special-status wildlife species have the potential to occur in the Regional Study Area (see Table 4.4-2). Based on field observations and literature review (detailed further in this chapter under the Method of Analysis subsection), 12 of the 28 special-status wildlife species were determined to have the potential to occur within the project site. In accordance with the categories listed above for potential of occurrence, species that are considered *present* include giant garter snake, northwestern pond turtle, northern harrier, and Swainson’s hawk.



**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|-------------------|------------------|------------------------|---|---|
| Plants | | | | | |
| <i>Centromadia parryi</i> ssp. <i>parryi</i> Pappose tarplant | -- | CRPR 1B.2 | No | Occurs in chaparral, coastal prairie, marshes and swamps, meadows and seeps, valley and foothill grassland at elevations ranging from sea level to 1,380 feet. Blooms from May to November. | Low. Habitat within the project site is considered low quality. The nearest records of the species are 8.5 miles to the southwest of the project site. Ongoing agriculture-related site disturbance limits the potential for species to occur. |
| <i>Lepidium latipes</i> var. <i>heckardii</i> Heckard's pepper-grass | -- | CRPR 1B.2 | No | Occurs in valley and foothill grassland at elevations ranging from five to 655 feet. Blooms from March to May. | Low. Habitat within the project site is considered low quality. The nearest extant occurrence is 7.5 miles to the southwest of the project site. Ongoing agriculture-related site disturbance limits the potential for species to occur. |
| <i>Extriplex joaquinana</i> San Joaquin spearscale | -- | CRPR 1B.2 | No | Occurs in chenopod scrub, meadows and seeps, playas, and valley and foothill grassland at elevations ranging from five to 2,740 feet. Blooms from April to October. | Low. Habitat within the project site is considered low quality. The nearest records are 7.5 miles to the west of the project site. Ongoing agriculture-related site disturbance limits the potential for species to occur. |
| <i>Hibiscus lasiocarpus</i> var. <i>occidentalis</i> Woolly rose-mallow | -- | CRPR 1B.2 | No | Occurs in marshes and swamps at elevations ranging from sea level to 395 feet. Blooms from June to September. | Low. Habitat within the project site is considered low quality. The nearest record is at the margins of a canal. Ongoing agriculture-related site disturbance limits the potential for species to occur. |
| <i>Chloropyron palmatum</i> Palmate-bracted bird's beak | FE | CE, CRPR 1B.1 | No | Occurs in chenopod scrub, as well as valley and foothill grassland, at elevations ranging from 15 to 510 feet. Blooms from May to October. | Low. Habitat within the project site is considered low quality. The nearest records are 7.5 miles to the west of the project site. Ongoing agriculture-related site disturbance limits the potential for species to occur. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|--|----------------|--------------|---------------------|---|--|
| <i>Sagittaria sanfordii</i> Sanford's arrowhead | -- | CRPR 1B.2 | Yes | Occurs in marshes and swamps at elevations ranging from sea level to 2,135 feet. Blooms from May to October. | Low. Habitat within the project site is considered low quality. The species is known to occur along roadside ditches and canals; however, all records are to the east and southeast of the project site and appear to be at the edge or outside of the species' distribution. Ongoing agriculture-related site disturbance limits the potential for species to occur. |
| <i>Symphotrichum lentum</i> Suisun marsh aster | -- | CRPR 1B.2 | No | Occurs in marshes and swamps at elevations ranging from sea level to 10 feet. Blooms from May to November. | No potential. Habitat is not present within the project site. |
| <i>Downingia pusilla</i> Dwarf downingia | -- | CRPR 2B.2 | No | Occurs in valley and foothill grassland and vernal pools at elevations ranging from five to 1,460 feet. Blooms from March to May. | No potential. Habitat is not present within the project site. |
| <i>Legenere limosa</i> Legenere | -- | CRPR 1B.1 | Yes | Occurs in vernal pools at elevations ranging from five to 2,885 feet. Blooms from April to June. | No potential. Habitat is not present within the project site. |
| <i>Atriplex cordulata</i> var. <i>cordulata</i> Heartsacle | -- | CRPR 1B.2 | No | Occurs in chenopod scrub, meadows and seeps, and valley and foothill grassland at elevations ranging from sea level to 1,835 feet. Blooms from April to October. | No potential. Habitat is not present within the project site. |
| <i>Atriplex depressa</i> Brittlescale | -- | CRPR 1B.2 | No | Occurs in chenopod scrub, meadows and seeps, playas, valley and foothill grassland, and vernal pools at elevations ranging from five to 1,050 feet. Blooms from April to October. | No potential. Habitat is not present within the project site. |



(Continues on next page)

**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|----------------|---------------|---------------------|--|--|
| <i>Astragalus tener</i> var. <i>ferrisiae</i> Ferris' milk-vetch | -- | CRPR 1B.1 | No | Meadows and seeps and valley and foothill grassland at elevations ranging from five to 245 feet. Blooms from April to May. | No potential. Habitat is not present within the project site. |
| <i>Astragalus tener</i> var. <i>tener</i> Alkali milk-vetch | -- | CRPR 1B.2 | No | Occurs in playas, valley and foothill grassland, and vernal pools at elevations ranging from five to 195 feet. Blooms from March to June. | No potential. Habitat is not present within the project site. |
| <i>Lathyrus jepsonii</i> var. <i>jepsonii</i> Delta tule pea | -- | CRPR 1B.2 | Yes | Occurs in marshes and swamps at elevations ranging from sea level to 15 feet. Blooms from May to July. | No potential. Habitat is not present within the project site. |
| <i>Trifolium hydrophilum</i> Saline clover | -- | CRPR 1B.2 | No | Occurs in marshes and swamps, valley and foothill grassland, and vernal pools at elevations ranging from sea level to 985 feet. Blooms from April to June. | No potential. Habitat is not present within the project site. |
| <i>Gratiola heterosepala</i> Boggs Lake hedge-hyssop | -- | CE, CRPR 1B.2 | Yes | Occurs in marshes and swamps (lake margins), and vernal pools at elevations ranging from 35 to 7,790 feet. Blooms from April to August. | No potential. Habitat is not present within the project site. |
| <i>Neostapfia colusana</i> Colusa grass | FT | CE, CRPR 1B.1 | Yes | Occurs in vernal pools at elevations ranging from 15 to 655 feet. Blooms from May to August. | No potential. Habitat is not present within the project site. |
| <i>Orcuttia tenuis</i> Slender Orcutt grass | FT | CE, CRPR 1B.1 | Yes | Occurs in vernal pools at elevations ranging from 115 to 5,775 feet. Blooms from May to September. | No potential. Habitat is not present within the project site. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|----------------|------------------|---------------------|--|---|
| <i>Orcuttia viscida</i> Sacramento Orcutt grass | FE | CE, CRPR 1B.1 | Yes | Occurs in vernal pools at elevations ranging from 100 to 330 feet. Blooms from April to July. | No potential. Habitat is not present within the project site. |
| <i>Puccinellia simplex</i> California alkali grass | -- | CRPR 1B.2 | No | Occurs in chenopod scrub, meadows and seeps, valley and foothill grassland, and vernal pools at elevations ranging from five to 3,050 feet. Blooms from March to May. | No potential. Habitat is not present within the project site. |
| Invertebrates | | | | | |
| <i>Bombus crotchii</i> Crotch's bumble bee | -- | CC | No | Occurs in open grasslands and scrub habitats. This species occurs primarily in California, including the Mediterranean region, Pacific Coast, Western Desert, Great Valley, and adjacent foothills through most of southwestern California. The species was historically common in the Central Valley of California, but now appears to be absent from most of the region, especially in the center of its historic range. | No potential. The ongoing agriculture-related site disturbance precludes suitable habitat to accommodate the species from occurring on-site. |

(Continues on next page)



**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|----------------|--------------|---------------------|--|---|
| <i>Danaus plexippus</i> Monarch butterfly | FC | -- | No | A migratory species that is most prevalent in the Central Valley in summer and early fall. Dependent upon milkweed (<i>Asclepias</i> species) plants as their exclusive larval host. | Low. Habitat within the project site is considered low quality. The nearest records are 38 miles to the southwest of the project site; however, as a migratory species with flight capability, the monarch butterfly has potential to occur anywhere during movements. Ongoing agriculture-related site disturbance and lack of suitable host plants limit the potential for species to occur. |
| <i>Branchinecta lynchi</i> Vernal pool fairy shrimp | FT | -- | Yes | Commonly observed in grass or mud-bottomed swales, earth sump, or basalt flow depression pools in unplowed grasslands. | No potential. Habitat is not present within the project site. |
| <i>Branchinecta mesovallensis</i> Midvalley fairy shrimp | -- | -- | Yes | Found in vernal pools, vernal swales, and ephemeral wetlands in the Central Valley. | No potential. Habitat is not present within the project site. |
| <i>Lepidurus packardii</i> Vernal pool tadpole shrimp | FE | -- | Yes | Inhabits vernal pools and swales containing clear to highly turbid water. | No potential. Habitat is not present within the project site. |
| <i>Desmocerus californicus dimorphus</i> Valley elderberry longhorn beetle | FT | -- | Yes | Endemic to the Central Valley. Found only in association with the species' host plant, the elderberry (<i>Sambucus</i> spp.) | No potential. Habitat is not present within the project site. |
| Fish | | | | | |
| <i>Acipenser medirostris</i> Green Sturgeon – Southern DPS | FT | CSC | No | Originate from coastal watersheds south of the Eel River, with the only known spawning population in the Sacramento River. Adults begin spawning migrations in late February. Spawning occurs from March to July, with peak activity from mid-April to mid-June. | No potential. Habitat is not present within the project site. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|-------------------|-----------------|------------------------|--|--|
| <i>Oncorhynchus mykiss irideus</i> Central Valley steelhead DPS | FT | -- | No | Anadromous species requiring freshwater water courses with gravelly substrates for breeding. Originates below natural and manmade, impassable barriers from the Sacramento and San Joaquin rivers and their tributaries. The young remain in freshwater areas before migrating to estuarine and marine environments. | No potential. Habitat is not present within the project site. |
| <i>Oncorhynchus tshawytscha</i> Central Valley spring-run chinook Salmon ESU | FT | CT | No | Adult Central Valley spring-run chinook salmon leave the ocean to begin their upstream migration in late January and early February and enter the Sacramento River between March and September, primarily in May and June. Spawning normally occurs between mid-August and early October, peaking in September. | No potential. Habitat is not present within the project site. |
| <i>Oncorhynchus tshawytscha</i> Sacramento River winter-run chinook Salmon ESU | FE | CE | No | Adult winter-run chinook salmon upstream spawning migration through the Sacramento/San Joaquin Delta (Delta) and into the lower Sacramento River occurs from December through July, with a peak during the period extending from January through April. Spawning occurs between late-April and mid-August, with a peak in June and July. | No potential. Habitat is not present within the project site. |

(Continues on next page)



**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|--|-------------------|-----------------|------------------------|---|--|
| <i>Hypomesus transpacificus</i> Delta smelt | FT | CE | No | Endemic to California and occurs only in the San Francisco Estuary. The Delta Smelt life cycle follows the four seasons: spring spawning in freshwater, summer migration/rearing in the low-salinity zone, fall maturation in the low-salinity zone, and winter upstream migration shortly before spawning. | No potential. Habitat is not present within the project site. |
| <i>Spirinchus thaleichthys</i> Longfin smelt | FC | CT | No | In California, longfin smelt has been historically found in the San Francisco Estuary and the Delta, Humboldt Bay, and the estuaries of the Eel River and Klamath River. Spawning occurs from November through May, with a peak from February through April. | No potential. Habitat is not present within the project site. |
| <i>Pogonichthys macrolepidotus</i> Sacramento splittail | -- | CSC | No | Splittail depend both on brackish-water rearing habitats in the San Francisco Estuary and on floodplain and river-edge spawning habitats immediately above the estuary. Most migrate between the two habitat types on a near annual basis. The Sacramento splittail is endemic to the Central Valley. | No potential. Habitat is not present within the project site. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|--|-------------------|-----------------|------------------------|---|--|
| Amphibians | | | | | |
| <i>Rana draytonii</i> California red-legged frog | FT | CSC | No | Occurs along the Coast Ranges from Mendocino County towards the south and in portions of the Sierra Nevada and Cascades ranges, usually below 3936 feet. Breeds in permanent to semi-permanent aquatic habitats including lakes, ponds, marshes, creeks, and other drainages. | No potential. Habitat is not present within the project site. |
| <i>Spea hammondi</i> Western spadefoot toad | -- | CSC | Yes | Ranges throughout the Central Valley and adjacent foothills. Occurs primarily in grasslands, but occasional populations also occur in valley-foothill hardwood woodlands. Elevations of occurrence extend from near sea level to 4460 feet in the southern Sierra Nevada foothills. | No potential. Habitat is not present within the project site. |
| <i>Ambystoma californiense</i> California tiger salamander | FE | CE | Yes | Commonly found in annual grassland habitat, but also occurs in the grassy understory of valley foothill hardwood habitats, and uncommonly along stream courses in valley foothill riparian habitats. The species occurs from near Petaluma, east through the Central Valley to Yolo and Sacramento counties and south to Tulare County; and from the vicinity of San Francisco Bay south to Santa Barbara County. Occurs at elevations to 3,200 feet. | No potential. Habitat is not present within the project site. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|--|-------------------|-----------------|------------------------|---|--|
| Reptiles | | | | | |
| <i>Thamnophis gigas</i> Giant garter snake | FT | CT | Yes | Historically ranged in the Sacramento and San Joaquin valleys. Current range is much reduced and apparently extirpated south of Fresno County, except for western Kern County. Primarily associated with marshes and sloughs, less with slow-moving creeks, and absent from larger rivers. Active from mid-March until October. | Assumed Present. Habitat within the project site is considered medium quality. Several CNDDDB records within the past 20 years document the presence of giant garter snake in the West Drainage Canal. Habitat in the project site is unlikely to support a permanent population, due to the lack of suitable burrows and high levels of vegetation management. However, the marginal habitat provides connectivity to occupied sites to the north and south of the project site. |
| <i>Actinemys marmorata</i> Northwestern pond turtle | -- | CSC | Yes | Associated with permanent or nearly permanent water in a wide variety of habitat types. Uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and absent from desert regions, except in the Mojave Desert along the Mojave River and its tributaries. Elevation range extends from near sea level to 4,690 feet. | Present. Habitat within the project site is considered medium quality. The species was detected during three field surveys in Canal-2 and Canal-3 within the project site. Individuals were observed sunning on floating debris and/or vegetation within the canals. Adjacent upland habitats are marginal for the species. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|-------------------|-----------------|------------------------|--|---|
| Birds | | | | | |
| <i>Circus hudsonius</i> Northern harrier | -- | CSC | No | Occurs from annual grassland up to lodgepole pine and alpine meadow habitats, as high as 10,000 feet. Breeds from sea level to 5,700 feet in the Central Valley and Sierra Nevada, and up to 3,600 feet in northeastern California. Frequents meadows, grasslands, open rangelands, desert sinks, and fresh and saltwater emergent wetlands. Seldomly found in wooded areas. | Present. Habitat within the project site is considered high quality. Northern harrier was observed foraging on and flying over the proposed industrial park footprint of the project site during two field surveys. |
| <i>Buteo swainsoni</i> Swainson's hawk | -- | CT | Yes | Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grasslands or suitable grain or alfalfa fields, or livestock pastures. | Present. Foraging habitat within the project site is considered high quality. Swainson's hawk was observed during April and May field surveys. Nesting activity was not detected. Nesting habitat is limited in the project site. |
| <i>Elanus leucurus</i> White-tailed kite | -- | CFP | No | Common to uncommon, yearlong resident in coastal and valley lowlands. Rarely found away from agricultural areas. Inhabits herbaceous and open stages of most habitats, mostly in cismontane California. | High. Habitat within the project site is considered high quality. The industrial park footprint of the project site contains foraging habitat that could support the species; however, nesting habitat is limited and composed of the relatively few Goodding's black willow, valley oak, and other trees along the canal and ditch banks. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|----------------|--------------|---------------------|---|---|
| <i>Athene cunicularia</i> Burrowing owl | -- | CSC | Yes | A yearlong resident of open, dry grassland and desert habitats, and in grass, forb and open shrub stages of pinyon-juniper and ponderosa pine habitats. | Moderate. Habitat within the project site is considered high quality. Most regional records are east of State Route (SR) 99. However, recent CNDDDB records document the species as having occurred within the vicinity of the Sacramento International Airport. The project site contains some open disturbed areas that provide marginal habitat; however, existing suitable burrows and ground squirrels were not observed. |
| <i>Branta hutchinsii leucopareia</i> Aleutian cackling goose | -- | -- | Yes | Preferred habitats include lacustrine, fresh emergent wetlands, and moist grasslands, croplands, pastures, and meadows. The species occurs mainly in the foregoing habitats during winter in Del Norte County, the San Francisco Bay-Delta, and southern Central Valley. | Low. Habitat within the project site is considered low quality. The nearest record is 28 miles to the north of the project site. The species has not been recorded within the Natomas Basin. Sometimes occurs with more numerous Canada Geese, which will often feed in agricultural fields, especially during winter months. |
| <i>Plegadis chihi</i> White-faced ibis | -- | -- | Yes | Uncommon summer resident in sections of Southern California. Rare visitor in the Central Valley and more widespread in migration. Prefers to feed in fresh emergent wetland, shallow lacustrine waters, muddy ground of wet meadows, and irrigated or flooded pastures and croplands. Nests in dense, fresh emergent wetland. | Low. Habitat within the project site is considered low quality. The nearest records are eight miles to the west of the project site. Has potential to be observed on the industrial park footprint of the project site at the margins of canals or adjacent agricultural areas for foraging. Nesting habitat does not occur. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|---|----------------|--------------|---------------------|---|---|
| <i>Lanius ludovicianus</i> Loggerhead shrike | -- | CSC | Yes | Common resident and winter visitor in lowlands and foothills throughout California. Prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches. Highest density occurs in open-canopied valley foothill hardwood, valley foothill hardwood-conifer, valley foothill riparian, pinyon-juniper, juniper, desert riparian, and Joshua Tree habitats. | Low. Habitat within the project site is considered low quality. The nearest records are more than 50 miles from the project site. Occurs sparingly in the Natomas Basin. Unlikely to be present on the industrial park footprint of the project site due to lack of scrubby habitat, which is normally present in preferred areas. |
| <i>Melospiza melodia</i> Song sparrow "Modesto" population | -- | CSC | No | Avoids higher mountains and occurs only locally in southern deserts. In winter, most leave montane habitats; more abundant and widespread than in lowlands and deserts. Prefers riparian, fresh or saline emergent wetland, and wet meadow habitats. Breeds in riparian thickets of willows, other shrubs, vines, tall herbs, and in fresh or saline emergent vegetation. | Low. Habitat within the project site is considered low quality. This resident form of the song sparrow has been recorded in sparsely vegetated margins of canals, such as those bordering the industrial park footprint of the project site, which contains limited habitat that could support nesting. |
| <i>Agelaius tricolor</i> Tricolored blackbird | -- | CT, CSC | Yes | Occurs locally throughout Central Valley and in coastal districts. Breeds near freshwater, preferably in emergent wetland with tall, dense cattails or tules, but also in thickets of willow, blackberry, wild rose, and tall herbs. Feeds in grassland and cropland habitats. Breeds locally in northeastern California. | Low. Habitat within the project site is considered low quality. Appropriate breeding habitat is not present; however, the species will often forage in agricultural fields, especially in winter. |

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**Table 4.4-2
 Special-Status Species with Potential to Occur Within the Project Site**

| Scientific Name (Common Name) | Federal Status | State Status | HCP Covered Species | Habitat Requirements | Potential for Occurrence |
|--|----------------|--------------|---------------------|---|--|
| <i>Vireo bellii pusillus</i> Least Bell's vireo | FE | CE | No | Winter in southern Baja California, Mexico, where they occupy a variety of habitats, including mesquite scrub within arroyos, palm groves, and hedgerows bordering agricultural and residential areas. The birds generally arrive in southern California breeding areas by mid-March to early April, with males arriving before females. Generally remains on the breeding grounds until late September, although some post-breeding migration may begin as early as late July. | No potential. Habitat is not present within the project site. |
| <i>Riparia riparia</i> Bank swallow | -- | CT | Yes | Found primarily in riparian and other lowland habitats in California west of the deserts during the spring-fall period. In summer, restricted to riparian, lacustrine, and coastal areas with vertical banks, bluffs, and cliffs with fine-textured or sandy soils. | No potential. Habitat is not present within the project site. |

Status Codes:

CC: CDFW Candidate for Listing
 CE: CDFW Endangered
 CFP: CDFW Fully Protected
 CRPR: California Rare Plant Rank
 CSC: CDFW Species of Concern

CT: CDFW Threatened
 FE: Federally Endangered
 FT: Federally Threatened

Source: Bargas Environmental Consulting, 2023.



Species that are considered to have *high* potential to occur include white-tailed kite. Species that are considered to have *moderate* potential to occur include burrowing owl. Species that are considered to have *low* potential to occur include monarch butterfly, cackling goose, white-faced ibis, loggerhead shrike, song sparrow “Modesto” population, and tricolored blackbird.

As discussed further in Section 4.4.4, Impacts and Mitigation Measures, of this chapter, the requisite habitat to support special-status wildlife species with low potential to occur on-site is not available at such a level to accommodate said species. Thus, the following discussions provide further details of only the six special-status wildlife species that are either *present* or have *moderate* to *high* potential of occurring on-site.

Giant Garter Snake

Giant garter snake (*Thamnophis gigas*) is federally and State-listed as threatened and is a Covered Species under the Natomas Basin HCP. The giant garter snake is an endemic species of wetlands in the Central Valley. Historically, the species was found from the Butte County vicinity to southward towards Bakersfield in Kern County. Currently, populations are found in the Sacramento Valley and in isolated pockets of the San Joaquin Valley. The giant garter snake forages in marshes, low-gradient open waterways, and flooded rice fields, and hibernates in canal berms and other uplands.

Giant garter snake was not observed during the field surveys conducted as part of the BRA. However, the CNDDDB includes several occurrences of the species within the past 20 years, where the reptile has been documented in the West Drainage Canal in the project vicinity. The West Drainage Canal is hydrologically connected to Fisherman’s Lake, located approximately 0.5-mile south of the proposed industrial park footprint of the project site and where a known population of giant garter snake occurs. Habitat within the on-site canals for the species is best described as marginal, containing some of elements required by the species and capable of supporting transient individuals. Based on the above, giant garter snake is assumed to be *present* within the project site.

Northwestern Pond Turtle

Northwestern pond turtle (*Actinemys marmorata*) is not federally or State-listed. The species is designated as a California Species of Special Concern and is a Covered Species under the Natomas Basin HCP. The species is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest, and absent from desert regions, except in the Mojave Desert along the Mojave River and its tributaries. Northwestern pond turtle occurs at elevations ranging from near sea level to 4,690 feet amsl. The species lives in permanent bodies of water, requires floating vegetation, logs, rocks, or banks for basking, and hibernates and lays eggs in upland areas.

Northwestern pond turtle was observed during three field surveys conducted as part of the BRA in Canal-2 and Canal-3 within the project site. Adjacent upland habitats are marginal for the species, as much of the canal banks are vertical and undercut. In addition, the top of the canal banks are highly compacted and show evidence of repeated mowing and grading along many reaches. Based on the above, northwestern pond turtle is considered *present* within the project site.



Northern Harrier

Northern harrier (*Circus hudsonius*) is not federally or State-listed. The species is designated as a California Species of Special Concern. The species breeds at elevations ranging from sea level to 5,700 feet above mean sea level in the Central Valley and the Sierra Nevada, and up to 3,600 feet in northeastern California. Northern harrier frequents meadows, grasslands, open rangelands, desert sinks, fresh and saltwater emergent wetlands. The species is seldom found in wooded areas. The northern harrier is a permanent resident of the northeastern plateau and coastal areas, but is less common in the Central Valley.

Northern harrier was observed foraging on and flying over the proposed industrial park footprint of the project site during two field surveys conducted as part of the BRA. In addition, the foraging habitat within the project site is considered high quality. Based on the above, northern harrier is considered *present* within the project site.

Swainson's Hawk

Swainson's hawk (*Buteo swainsoni*) is State-listed as threatened and is a Covered Species under the Natomas Basin HCP. The Swainson's hawk breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. The species forages in adjacent grasslands or suitable grain or alfalfa fields, or livestock pastures. Swainson's hawk was formerly abundant in California, with wider breeding range; however, the species' decline occurred, in part, from loss of nesting habitat.

Swainson's hawk was observed during the April and May field surveys conducted as part of the BRA. In addition, foraging habitat within the project site is considered high quality. Based on the above, Swainson's hawk is considered *present* within the project site.

White-Tailed Kite

White-tailed kite (*Elanus leucurus*) is a CDFW Fully Protected species. White-tailed kite is a common-to-uncommon, yearlong resident in coastal and valley lowlands and rarely found away from agricultural areas. The species inhabits herbaceous and open stages of most habitats, mostly in cismontane California. White-tailed kite has extended its range and increased its numbers in recent decades.

The proposed industrial park footprint of the project site contains foraging habitat that could support white-tailed kite; however, nesting habitat is limited and composed of the relatively few Goodding's black willow, valley oak, and other trees along the canal and ditch banks. Overall, foraging habitat within the project site is considered high quality. Based on the above, white-tailed kite is considered to have *high* potential for occurrence within the project site.

Burrowing Owl

Burrowing owl (*Athene cunicularia*) is not federally or State-listed. The species is designated as a California Species of Special Concern and is a Covered Species under the Natomas Basin HCP. Burrowing owl is a yearlong resident of open, dry grassland and desert habitats, as well as grass, forb, and open shrub stages of pinyon-juniper and ponderosa pine habitats. The species was previously common in appropriate habitats throughout the State, excluding the humid northwest coastal forests and high mountains. The species typically uses burrows created by fossorial mammals, most notably the California ground squirrel, but may also use manmade structures such as culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement. The species' breeding season extends from February through August.



Most regional records are east of SR 99. However, recent CNDDDB records document the species as having occurred within the vicinity of the Sacramento International Airport. The project site contains some open disturbed areas that provide marginal habitat; however, existing suitable burrows and ground squirrels were not observed. Based on the above, burrowing owl is considered to have *moderate* potential for occurrence within the project site.

Trees

A preliminary tree survey was conducted by Raney Planning and Management, Inc. (Raney) on May 10, 2023 of the project site to identify on-site trees. As shown in Figure 4.4-4, the site contains 11 trees within the industrial park footprint, as well as a cluster of seven trees along the southern boundary of Parcel 5, which is contiguous with Parcel 8, a nonparticipating parcel that could be developed with future industrial uses. Additional trees are located within the boundaries of various nonparticipating parcels. The trees are identified as follows:

1. One willow;
2. Seven willows;
3. Two cottonwoods;
4. One cottonwood; and
5. Seven-tree cluster of Goodding's willow – red willow riparian woodland south of Parcel 5 boundary.

As detailed further in Section 4.3.3, Regulatory Context, of this chapter, removal of protected trees, as defined by the City of Sacramento Tree Ordinance set forth in Sacramento City Code Chapter 12.56, requires issuance of a Tree Permit.

4.4.3 REGULATORY CONTEXT

A number of federal, State, and local policies provide the regulatory framework that guides the protection of biological resources. The following discussion summarizes those laws that are most relevant to biological resources in the vicinity of the project site.

Federal Regulations

The following are the federal environmental laws and policies relevant to biological resources.

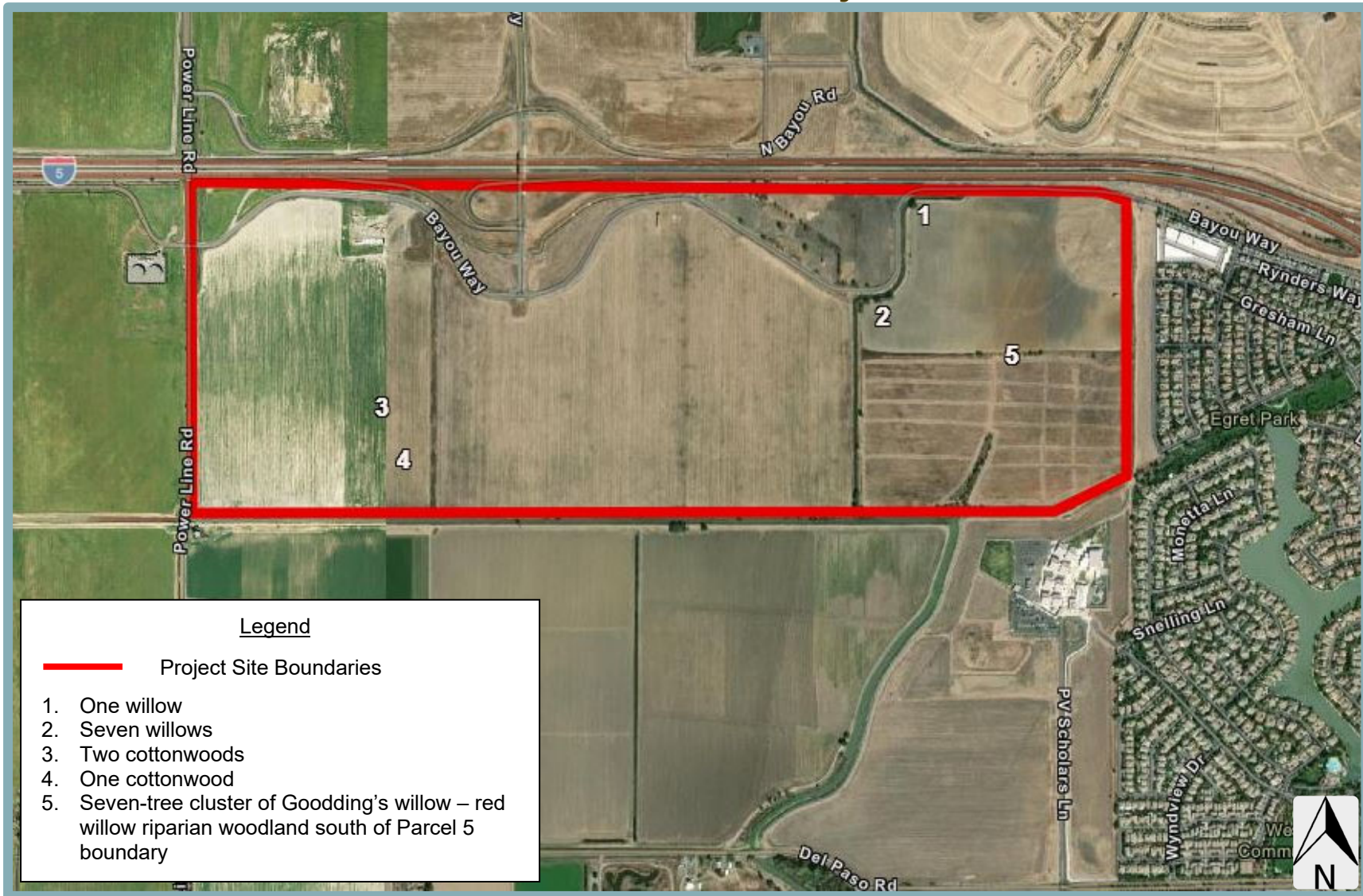
Federal Endangered Species Act

The U.S. Congress passed the FESA in 1973 to protect species that are endangered or threatened with extinction. FESA is intended to operate in conjunction with the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend. Under the FESA, the Secretary of the Interior and the Secretary of Commerce have joint authority to list a species as threatened or endangered (16 U.S. Code [USC] Section 1533[c]). Two federal agencies oversee the FESA: the USFWS has jurisdiction over plants, wildlife, and resident fish, while the NMFS has jurisdiction over anadromous fish and marine fish and mammals. Section 7 of the FESA mandates that federal agencies consult with the USFWS and/or NMFS to ensure that federal agency actions do not jeopardize the continued existence of a listed species or destroy or adversely modify critical habitat for listed species.

FESA prohibits the “take” of endangered or threatened wildlife species. “Take” is defined to include harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (FESA Section 3 [3], [19]).



**Figure 4.4-4
Tree Locations Within the Project Site**



Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns (50 Code of Federal Regulations [CFR] Section 17.3). Harass is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns (50 CFR Section 17.3). Absent authorization from USFWS, actions that result in take can result in civil or criminal penalties.

For federally listed species covered under the Natomas Basin HCP, the Biological Opinion issued by the USFWS provides take coverage for covered projects that may impact federally listed species that are Covered Species under the Natomas Basin HCP. Further consultation is not required as long as the covered project complies with the applicable Natomas Basin HCP requirements. For federally listed species that are not Covered Species, FESA consultation with USFWS or the NMFS would be initiated if development resulted in take of a threatened or endangered species or if issuance of a Section 404 permit or other federal agency action could result in take of an endangered species not covered under the Natomas Basin HCP or adversely modify critical habitat of such a species.

Migratory Bird Treaty Act

Raptors (birds of prey), migratory birds, and other avian species are protected by a number of State and federal laws. The federal Migratory Bird Treaty Act (MBTA) prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior.

Clean Water Act

The USACE regulates discharge of dredged or fill material into waters of the U.S. under Section 404 of the Clean Water Act (CWA). “Discharge of fill material” is defined as the addition of fill material into waters of the U.S., including, but not limited to, the following: placement of fill that is necessary for the construction of any structure, or impoundment requiring rock, sand, dirt, or other material for the construction; site-development fills for recreational, industrial, commercial, residential, and other uses; causeways or road fills; and fill for intake and outfall pipes and sub-aqueous utility lines (33 CFR Section 328.2[f]). In addition, Section 401 of the CWA (Title 33 USC, Section 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to obtain a certification that the discharge would comply with the applicable effluent limitations and water quality standards.

Waters of the U.S. include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, and wet meadows. Wetlands are defined as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR Section 328.3[b]).

Furthermore, jurisdictional waters of the U.S. can be defined by exhibiting a defined bed and bank and OHWM. The OHWM is defined by the USACE as “that line on shore established by the fluctuations of water and indicated by physical character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas” (33 CFR Section 328.3[e]).

In addition to discharge of dredged or fill material into waters of the U.S. under Section 404, the CWA regulates municipal and industrial discharges to surface waters of the U.S through the



National Pollutant Discharge Elimination System (NPDES) permit system, which is discussed in detail in Chapter 4.8, Hydrology and Water Quality, of this EIR.

State Regulations

The following are the State environmental laws and policies relevant to biological resources.

California Department of Fish and Wildlife

CDFW administers a number of laws and programs designed to protect fish and wildlife resources under the California Fish and Game Code (CFGC), such as CESA (CFGC Section 2050, et seq.), Fully Protected Species (CFGC Section 3511) and the Lake or Streambed Alteration Agreement (LSAA) Program (CFGC Sections 1600 to 1616). Such regulations are summarized in the following sections.

California Endangered Species Act

The State of California enacted CESA in 1984. CESA is similar to the FESA but pertains to State-listed endangered and threatened species. CESA requires State agencies to consult with CDFW when preparing CEQA documents to ensure that the State lead agency actions do not jeopardize the existence of listed species. CESA directs agencies to consult with CDFW on projects or actions that could affect listed species, directs CDFW to determine whether jeopardy would occur, and allows CDFW to identify “reasonable and prudent alternatives” to the project consistent with conserving the species.

As with FESA, for covered projects that may impact State-listed species under CESA that are also Covered Species under the Natomas Basin HCP, direct consultation with CDFW for State-listed take authorization is not required as long as the covered project complies with the applicable HCP requirements. For projects that may result in take of State-listed species that are not Natomas Basin HCP Covered Species, CESA directs agencies to consult with CDFW on projects or actions that could affect listed species, directs CDFW to determine whether jeopardy would occur, and allows CDFW to identify “reasonable and prudent alternatives” to the project consistent with conserving the species. CESA allows CDFW to authorize exceptions to the State’s prohibition against take of a listed species if the “take” of a listed species is incidental to carrying out an otherwise lawful activity and the impacts of the taking are minimized and fully mitigated (CFGC Section 2081).

California Fish and Game Codes

A number of species have been designated “fully protected” species under Sections 5515, 5050, 3511, and 4700 of the CFGC, but are not listed as endangered (Section 2062) or threatened (Section 2067) species under CESA. Except for take related to scientific research, all take of fully protected species is prohibited. The CFGC defines take as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

Birds of prey are protected in California under provisions of the CFGC Section 3503.5 (1992), which states, “it is unlawful to take, possess, or destroy any birds in the order *Falconiformes* or *Strigiformes* (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “taking” by CDFW.



Lake or Streambed Alteration Program

The CDFW is responsible for conserving, protecting, and managing California's fish, wildlife, and native plant resources. To meet this responsibility, the CFGC Section 1602 requires notification to CDFW of any proposed activity that may substantially modify a river, stream, or lake. Notification is required by any person, business, State or local government agency, or public utility that proposes an activity that would:

- substantially divert or obstruct the natural flow of any river, stream or lake;
- substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

For the purposes of Section 1602, rivers, streams, and lakes must flow at least intermittently through a bed or channel.⁸ If notification is required and CDFW believes the proposed activity is likely to result in harm to the natural environment, the CDFW requires that the parties enter into a LSAA.

CDFW Species of Special Concern

In addition to formal listings under FESA and CESA, plant and wildlife species receive additional consideration during the CEQA process. Species that may be considered for review are included on a list of "Species of Special Concern" developed by CDFW. Species whose numbers, reproductive success, or habitat may be threatened are tracked by CDFW in California.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. Currently 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations, emergencies, and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations.

Regional Water Quality Control Board

Any action requiring a CWA Section 404 permit, or a Rivers and Harbors Act Section 10 permit, must also obtain a CWA Section 401 Water Quality Certification (WQC). The State of California WQC Program was formally initiated by the State Water Resources Control Board (SWRCB) in 1990 under the requirements stipulated by Section 401 of the federal CWA. Although the CWA is a federal law, Section 401 of the CWA recognizes that states have the primary authority and responsibility for setting water quality standards. In California, under Section 401, the SWRCB and Regional Water Quality Control Boards (RWQCBs) are the authorities that certify that issuance of a federal license or permit does not violate California's water quality standards (i.e., that they do not violate Porter-Cologne and the Water Code). The WQC Program currently issues the WQC for discharges requiring USACE's permits for fill and dredge discharges within waters of the U.S., and also implements the State's wetland protection and hydromodification regulation program under the Porter Cologne Water Quality Control Act.

⁸ CFGC Section 1602 also applies to ephemeral flow.



On April 2, 2019, the SWRCB adopted a State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures), for inclusion in the forthcoming Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California Plan. The Procedures consist of four major elements: (1) a wetland definition; (2) a framework for determining if a feature that meets the wetland definition is a water of the State; (3) wetland delineation procedures; and (4) procedures for the submittal, review, and approval of applications for WQCs and Waste Discharge Requirements (WDR) for dredge or fill activities. The State Office of Administrative Law (OAL) approved the Procedures on August 28, 2019, and the Procedures became effective May 28, 2020.

Under the Procedures and the State Water Code (Water Code Section 13050[e]), “waters of the State” are defined as “any surface water or groundwater, including saline waters, within the boundaries of the state.” Unless excluded by the Procedures, any activity that could result in discharge of dredged or fill material to waters of the State, which includes waters of the U.S. and non-federal waters of the State, requires filing of an application under the Procedures.

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act, Water Code Section 13000, et seq.) is California’s statutory authority for the protection of water quality in conjunction with the federal CWA. The Porter-Cologne Act requires the SWRCB and RWQCBs under the CWA to adopt and periodically update water quality control plans, or basin plans. Basin plans are plans in which beneficial uses, water quality objectives, and implementation programs are established for each of the nine regions in California. The Porter-Cologne Act also requires dischargers of pollutants or dredged or fill material to notify the RWQCBs of such activities by filing Reports of Waste Discharge and authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements, NPDES permits, Section 401 water quality certifications, or other approvals.

Local Regulations

The following are the local environmental laws and policies relevant to biological resources.

City of Sacramento 2040 General Plan

The following goals and policies from the City of Sacramento 2040 General Plan related to biological resources are applicable to the proposed project.

Environmental Resources and Constraints Element

Goal ERC-2 Thriving rivers, wildlife, and natural open spaces that contribute to public health, livability, and protection of the environment for future generations.

- Policy ERC-2.1 **Conservation of Water Resources in Open Space Areas.**
The City shall continue to preserve, protect, and provide appropriate access to designated open space areas along the American and Sacramento Rivers, floodways, and undevelopable floodplains, provided access would not disturb sensitive habitats or species, and shall support efforts to conserve and, where feasible, create or restore areas that provide important water quality and habitat benefits such as creeks, riparian corridors, buffer zones, wetlands, open space areas, levees, and drainage canals for the purpose of protecting



water resources and habitats in the city's watersheds, creeks, and the Sacramento and American Rivers.

- Policy ERC-2.2 **Biological Resources.** The City shall ensure that adverse impacts on sensitive biological resources, including special-status species, sensitive natural communities, sensitive habitat, and wetlands are avoided, minimized, or mitigated to the greatest extent feasible as development takes place.
- Policy ERC-2.3 **Onsite Preservation.** The City shall encourage new development to preserve and restore on-site natural elements that contribute to the community's native plant and wildlife species value. For sites that lack existing natural elements, encourage planting of native species in preserved areas to establish or re-establish these values and aesthetic character.
- Policy ERC-2.6 **Wetland Protection.** The City shall preserve and protect wetland resources including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetlands, to the extent feasible. If not feasible, the mitigation of all adverse impacts on wetland resources shall be required in compliance with State and Federal regulations protecting wetland resources, and if applicable, threatened or endangered species. Additionally, the City shall require either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no-net-loss of value and/or function.
- Policy ERC-2.7 **Annual Grasslands.** The City shall preserve and protect native grasslands and vernal pools that provide habitat for rare and endangered species. If not feasible, the mitigation of all adverse impacts on annual grasslands shall comply with State and Federal regulations protecting foraging habitat for those species known to utilize this habitat.
- Policy ERC-2.8 **Wildlife Corridors.** The City shall preserve, protect, and avoid impacts to natural, undisturbed habitats that provides movement corridors for sensitive wildlife species. If corridors are adversely affected, damaged habitat shall be replaced with habitat of equivalent value or enhanced to enable the continued movement of species.
- Policy ERC-2.9 **Habitat Assessments.** The City shall consider the potential impact on sensitive plants and wildlife for each project requiring discretionary approval. If site conditions are such that potential habitat for sensitive plant and/or wildlife species may be present, the City shall require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either:



1. Protocol-level surveys shall be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey shall be conducted consistent with industry-recognized best practices; or
2. Suitable habitat and presence of the species shall be assumed to occur within all potential habitat locations identified on the project site. Survey Reports shall be prepared and submitted to the City and the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS) (depending on the species) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law.

Policy ERC-2.10 **Agency Coordination.** The City shall coordinate with State and Federal resource agencies (e.g., California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers, and United States Fish and Wildlife Service (USFWS) to protect areas containing rare or endangered species of plants and animals.

Policy ERC-2.11 **Natomas Basin Habitat Conservation Plan.** The City shall continue to participate in and support the policies of the Natomas Basin Habitat Conservation Plan for the protection of biological resources in the Natomas Basin.

Policy ERC-2.12 **Support Habitat Conservation Plan Efforts.** The City shall encourage and support regional habitat conservation planning efforts to conserve and manage habitat for special status species. New or amended Habitat Conservation Plans should provide a robust adaptive management component sufficient to ensure that habitat preserves are resilient to climate change effects/impacts and to ensure their mitigation value over time. Provisions should include, but are not limited to: greater habitat ranges and diversity; corridors and transition zones to accommodate retreat or spatial shifts in natural areas; redundant water supply; elevated topography to accommodate extreme flooding; and flexible management and fee structure.

Policy ERC-2.13 **Climate Change-related Habitat Shifts.** The City shall support the efforts of The Natomas Basin Conservancy and other habitat preserve managers to adaptively manage wildlife preserves to ensure adequate connectivity, habitat range, and diversity of topographic and climatic conditions are provided for species to move as climate shifts.

Policy ERC-2.14 **Climate Change-related Habitat Restoration and Enhancement.** The City shall support active habitat restoration and enhancement to reduce impact of climate change stressors



and improve overall resilience of habitat within existing parks and open space in the city. The City shall support the efforts of Sacramento County to improve the resilience of habitat areas in the American River Parkway.

Goal ERC-3 A well-maintained, resilient, healthy, expansive and equitable urban forest for an environmentally sustainable future.

Policy ERC-3.1 **Urban Forest Plan.** The City shall maintain and implement an Urban Forest Plan.

Policy ERC-3.2 **Tree Canopy Expansion.** The City should strive to achieve a 25 percent urban tree canopy cover by 2030 and 35 percent by 2045. Prioritize tree planting and tree maintenance in areas with the lowest average canopy cover and explore strategies to reduce barriers to tree planting in disadvantaged communities and improve tree health.

Policy ERC-3.3 **Tree Protection.** The City shall encourage public agencies and require private development projects to consider alternatives to removals of healthy trees whenever feasible and to evaluate the longer-term consequences of the inability to meet tree canopy objectives when conducting project analyses and environmental documents. Ensure adequate protections during construction to protect existing tree roots and structure.

Policy ERC-3.7 **Trees of Significance.** The City shall promote stewardship of city trees and private protected trees and ensure that the design of development projects provides for the retention of these trees where possible. Where removal cannot be avoided, the City shall require replacement or appropriate remediation.

Natomas Basin Habitat Conservation Plan

The Natomas Basin HCP, adopted in November 1997 and revised in 2003, was designed to promote biological conservation along with economic development and continuation of agriculture in the Natomas Basin. The Natomas Basin HCP provides for the conservation of 22 wildlife and plant Covered Species through a multi-species conservation program to minimize and mitigate the expected loss of habitat values and incidental take of Covered Species that could result from urban development and certain activities associated with The Natomas Basin Conservancy's management of reserves established under the HCP. The Natomas Basin HCP applies to the 53,537-acre area interior to the toe of levees surrounding the basin, which is located in the northern portion of Sacramento County and the southern portion of Sutter County. The basin contains incorporated and unincorporated areas within Sacramento County and Sutter County.

The USFWS and CDFW have each approved the Natomas Basin HCP and issued incidental take permits to the City and Sutter County for take of listed species (USFWS for federally listed species, CDFW for State-listed species) resulting from urban development in the Natomas Basin. As Sacramento County is not a permittee under the Natomas Basin HCP, urban development within the unincorporated portions of the County is not covered under the Natomas Basin HCP.



However, an HCP has been adopted for Metro Air Park, which is managed by the Natomas Basin Conservancy. The combined area covered by the Natomas Basin HCP and Metro Air Park HCP authorizes take associated with 17,500 acres of urban development. Management of the Natomas Basin HCP is heavily focused on the two most widely distributed Covered Species in the basin: Swainson's hawk and giant garter snake.

Swainson's hawk is an upland foraging species that nests along the Sacramento River and in isolated trees and groves throughout the Natomas Basin. The Natomas Basin HCP seeks to avoid development in the Swainson's Hawk Zone and to acquire upland habitat as mitigation lands inside the Swainson's Hawk Zone.⁹ Giant garter snake is found primarily in agricultural wetlands, such as rice fields, and other waterways, such as drainage canals, as well as adjacent uplands in many portions of the Natomas Basin. Management of habitat for Swainson's hawk and giant garter snake has been anticipated to benefit other Covered Species under the Natomas Basin HCP. The eastern portion of the project site is within the Natomas Basin HCP permit area (see Figure 4.4-2).

City of Sacramento Tree Ordinance

The City of Sacramento Tree Ordinance is set forth in Sacramento City Code Chapter 12.56. The Sacramento Tree Ordinance serves "to provide for the conservation of existing tree resources; to optimize tree canopy coverage throughout the city while recognizing individual rights to develop and make reasonable use of private property consistent with the general plan; and to provide clear standards for protection, removal, and replacement of city trees and private protected trees" (Sacramento City Code Section 12.56.010). For the purposes of this ordinance, the two categories of protected trees are defined as:

- A "City Tree" is any tree, the trunk of which when measured 4.5 feet above ground is partially or completely located in a City park, on real property the City owns in fee, or on a public ROW, including any street, road, sidewalk, park strip, mow strip, or alley; and
- A "Private Protected Tree" is any of the following:
 - A tree that is designated by City Council resolution to have special historical value, special environmental value, or significant community benefit, and is located on private property;
 - Any native valley oak (*Quercus lobata*), blue oak (*Quercus douglasii*), interior live oak (*Quercus wislizenii*), coast live oak (*Quercus agrifolia*), California buckeye (*Aesculus californica*), or California sycamore (*Platanus racemose*), that has a diameter at standard height (DSH) of 12 inches or more and is located on private property;
 - A tree that has a DSH of 24 inches or more and is located on private property that is an undeveloped lot or does not include any single unit or duplex dwellings; or
 - A tree that has a DSH of 32 inches or more located on private property that includes any single unit or duplex dwelling.

⁹ The Natomas Basin HCP Swainson's Hawk Zone is defined as the lands that are not currently developed (excluding the 250 acres of land designated "Urban" in the City of Sacramento General Plan and the North Natomas Community Plan, located within the City of Sacramento) and located within the Natomas Basin, within one mile east of the toe of the inside levee of the Sacramento River and extending from the Natomas Cross Canal on the north and I-80 on the south.



The City recognizes that “trees are a signature of the city and are an important element in promoting the well-being of the citizens of Sacramento” (Sacramento City Code Section 12.56.010). The City requires a Tree Permit to perform any activity, not including routine maintenance, that could adversely impact the health of a City Tree or Private Protected Tree (Sacramento City Code Section 12.56.020). Regulated work activities include removal of a tree; pruning of branches or roots; affixing signs, lights, or other hardware to a tree; grading, clearing, excavating, adding fill soil, trenching, boring, compacting, or paving within the Tree Protection Zone; placing or storing construction equipment or construction material within the Tree Protection Zone; application of any harmful substance within the Tree Protection Zone; and topping of a tree.

4.4.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project’s potential impacts related to biological resources. In addition, a discussion of the project’s impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, the City’s General Plan, and professional judgment, a significant impact would occur if the proposed project would result in the following:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS;
- 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;
- 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;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and
- Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

Method of Analysis

The information presented in this chapter is primarily based on the BRA and ARD prepared by Bargas, as well as a preliminary tree survey of the project site and compliance with the Natomas Basin HCP. Each is discussed further below.

Biological Resource Assessment

The analysis within the BRA (see Appendix E of this EIR) is based on a literature review and field surveys of the study area. The terminology and acreages, literature review, and field surveys are detailed further below. Due to the proposed off-site force main alignment occurring along existing roadway ROW and other previously disturbed areas, the BRA did not include evaluation of the force



main alignment, as special-status species and their habitat, as well as other protected biological resources, would not occur in such areas.

Terminology and Acreages

The BRA defines the industrial park footprint as the “project site” (see Figure 4.4-1). However, as discussed in the Project Description chapter of this EIR, the project site consists of 474.4 acres, with a 353.5-acre footprint related to the construction of the proposed industrial park and highway commercial, an 83-acre portion comprised of nonparticipating parcels anticipated for future industrial uses, and a 37.9-acre area containing Caltrans I-5 fee title ROW. The BRA additionally includes definitions for the following areas:

- Annexation Area: The area proposed for annexation into the City, which encompasses the BRA-defined “project site” and is delineated by the BRA with a 475-acre boundary;
- Biological Study Area: The BRA-defined “project site” and a 250-foot buffer; and
- Regional Study Area: The BRA-defined “project site” and a five-mile buffer.

The Biological Study Area is the area in which Bargas surveyed for potential habitat to support special-status plant and wildlife species, as well as for occurrences of special-status species, within the industrial park footprint. The Annexation Area (which encompasses the nonparticipating parcels and Caltrans ROW) were also evaluated at an appropriate level, as detailed further below. Additionally, the Regional Study Area was used as the basis for determining special-status biological resource records for consideration in the BRA.

Literature Review

Prior to conducting field surveys, Bargas conducted an initial review of literature and data sources to characterize biological conditions and to compile records of sensitive biological resources that could potentially occur in the study area. In order to better understand the biological setting of the study area, including terrain, hydrology, soils, land uses, and other features that support or inhibit biological resources, the following resources were reviewed in detail:

- The USFWS National Wetlands Inventory to determine if surface waters and wetlands have been mapped on or adjacent to the study area;
- The USGS National Hydrography Dataset to determine if hydrological features have been mapped on or adjacent to the study area;
- The U.S. Department of Agriculture National Resource Conservation Service (NRCS) Web Soil Survey to map and describe soil(s) within the study area; and
- Google Earth Pro aerial map images of the study area, including historical aerial images.

In addition, the following data sources were queried to create a well-defined list of habitats and species that could reasonably be expected to occur on the proposed industrial park footprint of the project site in order to analyze potential impacts on biological resources:

- USFWS Information for Planning and Consultation (IPaC) portal for a list of federally listed species and designated critical habitat recommended for impact analysis consideration, based on an upload of the study area limits;
- CNDDB for special-status species and habitat records within the Regional Study Area; and



- CNPS Inventory of Rare and Endangered Plants for a list of special-status plant species occurrences within the USGS 7.5-minute quadrangles that overlap the Regional Study Area.

Field Surveys

Bargas conducted a total of five field surveys on the following dates: October 27 and 28, 2021, and March 9, April 12, May 27, and July 5, 2022. The biological survey was conducted across the March and April 2022 site visits, consisting of transects through the industrial park footprint and scanning adjacent areas within the study area and 474.4-acre overall project site using binoculars. All areas within the overall project site that were accessible from public ROW or visible from the industrial park footprint were evaluated for the presence of habitat components that could support the special-status plant and wildlife species identified during the literature and database review described above. The biological surveys conducted were comprehensive. As discussed within the various analyses below of potential impacts that could occur to special-status species, the proposed project's compliance with Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP, as well as non-Natomas Basin HCP mitigation measures required by this EIR, would ensure that preconstruction protocol-level surveys, when necessary to prevent potential impacts to special-status species, would be completed.

The surveys also included a formal ARD (described below). A site visit was also conducted in May 2022 with the project applicant and staff from various agencies during which additional bird species observations were documented. The surveys occurred within the typical nesting bird season (February 15 to August 31) and within the blooming period of all 27 special-status plant species identified in the literature and database review.

Aquatic Resources Delineation

Bargas conducted the ARD on October 27 and 28, 2021 (see Appendix F of this EIR), in accordance with the minimum standards set forth by the USACE South Pacific Division and Sacramento District Regulatory Program, as well as the Corps of Engineers Wetlands Delineation Manual, Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States. An additional site visit was conducted on July 5, 2022 to collect additional data. Prior to conducting the field ARD, the following information sources were reviewed:

- Google Earth aerial imagery of the industrial park footprint and surrounding vicinity;
- NRCS soil survey maps and unit descriptions, Web Soil Survey, Sacramento County;
- USFWS National Wetlands Inventory – Wetlands Online Mapper; and
- USGS National Hydrography Dataset to determine if hydrological features have been mapped on or adjacent to the industrial park footprint.

The site assessment consisted of walking meandering transects throughout the portions of the industrial park footprint south of Bayou Way to identify wetlands or waterways potentially under the jurisdiction of USACE. Where wetlands were suspected to be present based on aerial signatures and conditions observed in the field, soil pits were excavated to a depth of approximately 18 inches or until an impermeable layer was reached. The three wetland criteria (i.e., hydrophytic vegetation, hydric soils, and wetland hydrology) were evaluated following the USACE protocol for the Arid West. The locations of the sample points and aquatic features were noted on aerial images of the industrial park footprint. Mapped soil types in the industrial park



footprint were determined using the NRCS Web Soil Survey, Custom Soil Resource Report. A standard Munsell Soil Color Chart was used to determine soil matrix and mottle colors in the field. Where present, the OHWM for all identified potential non-wetland waters of the U.S. were delineated. Plant community names followed the CNPS A Manual of California Vegetation, Second Edition, where applicable. Plant nomenclature followed Jepson eFlora. The USACE National Wetland Plant List, Version 3.5 was used to determine the status of observed plants as wetland indicator species.

Boundaries of hydrologic features (including man-made features) within the industrial park footprint were surveyed and mapped using an Eos Arrow 100 receiver paired with the Eos Pro Tools and ESRI Field Maps applications. Global Positioning System (GPS) data were downloaded through ArcGIS Online and converted into ESRI shapefile format. The geographic coordinate system used to reference the data was Universal Transverse Mercator (UTM–Zone 10), North American Datum (NAD83) in meters.

Each wetland was assessed by determining the wetland feature/upland edges and by observing the mandatory wetland indicators at selected points along each transect as defined by the USACE standards discussed above. Potential wetland boundaries were mapped at a level of accuracy of less than one meter. Soil pits were hand-excavated to obtain soil data for wetlands. Data were overlaid on an aerial photograph provided by ESRI ArcGIS World Imagery. The top of bank was mapped for non-wetland waters (canals). The bankfull width and location of the OHWM in relation to the top of bank was noted. Desktop methods were then used to map the location of the OHWM on both banks of each non-wetland feature and top of bank opposite the bank mapped with GPS in the field. The ESRI data and GIS software were used to calculate the acreage of each polygon. Mapping requirements, as set forth by the USACE Updated Map and Drawing Standards for the South Pacific Division Regulatory Program and the Minimum Standards for Acceptance of Aquatic Resources Delineation Reports for the Sacramento District were followed.

Data for each potential wetland were collected using the USACE Wetland Determination Data Form – Arid West Region. Data forms were completed at representative locations to determine whether suspect features qualify as jurisdictional wetlands or other waters of the U.S. Wetlands were determined based on the presence of the three factors that define wetlands. Data for each potential non-wetland water were collected using the USACE Arid West Ephemeral and Intermittent Streams OHWM Datasheet. Data for each linear feature were collected at representative cross sections with observations on sediment texture and vegetation characteristics summarized for each floodplain unit present. The OHWM for each linear feature were determined based upon the presence of certain indicators, which can include a change in average sediment texture, vegetation species, vegetation cover, and breaks in bank slope.

Tree Survey

A preliminary tree survey was conducted by Raney on May 10, 2023 of the project site to identify a stem count of trees that would be potentially impacted by development of the proposed industrial park, as well as trees within nonparticipating parcels that could be impacted if such areas are developed with industrial uses in the future. The site was surveyed by driving around the site boundaries to identify trees that occur along the perimeter and internal to the site. Internal trees were further examined on-foot.



Natomas Basin Habitat Conservation Plan

The Natomas Basin HCP and accompanying incidental take permits issued by USFWS and CDFW (collectively, the Wildlife Agencies) are based on a limit on urban development within the Natomas Basin to 17,500 acres, 8,050 acres of which are allocated to the City of Sacramento. To fund protection of habitat under the Natomas Basin HCP, a mitigation fee must be paid by developers and landowners when they obtain development permits from the City of Sacramento, with revenue from those fees used to acquire, enhance, and manage habitat for the Covered Species.

The Natomas Basin HCP requires that a system of habitat mitigation lands or reserves be established to provide wetland and upland habitat values for giant garter snake, Swainson's hawk, and other species. The Natomas Basin HCP requires that 0.5-acre of mitigation land be conserved for each acre of land that is developed in the Natomas Basin. In addition, projects of more than 50 acres in size pay a reduced fee in conjunction with providing land dedication at a 0.5:1 ratio. The land dedication is required to be located in Natomas Basin and the mitigation property is deeded to the Natomas Basin Conservancy. Under the Natomas Basin HCP, the Natomas Basin Conservancy carries out habitat acquisition and management activities set forth in the Natomas Basin HCP. To the maximum extent practicable, the Natomas Basin Conservancy must complete habitat acquisition in advance of habitat conversion resulting from authorized development in the Natomas Basin.

Mitigation land may be acquired either using mitigation fees paid by developers or through transfer of mitigation lands from developers as part of their mitigation obligation. Fees are paid based on the acreage of land approved for development and the funds necessary to assure the establishment of reserve lands consistent with Natomas Basin HCP requirements. When the Natomas Basin HCP was first adopted, an initial fee was established through a funding study prepared by Economic and Planning Systems, Inc. The fee has increased periodically to adjust for inflation and reflect increases in operation and land costs, adaptive management, and plan modifications resulting from Giant Garter Snake Recovery Plan implementation.

Natomas Basin HCP fees and acreages have been tracked by the City for more than 20 years pursuant to the Natomas Basin HCP and Implementation Agreement, which requires the City to provide an Annual Report to the Wildlife Agencies detailing authorized urban development activities (Implementation Agreement, Section 3.1.15; Natomas Basin HCP, Section VI-G). The Annual Report includes maps and charts that depict the City's monitoring of urban development associated with the Natomas Basin HCP. The latest report shows the City has authorized grading of 6,791.83 acres under the Natomas Basin HCP through calendar year 2023 and collected more than \$52.4 million in HCP fees (excluding valuation of land dedications) (2023 Annual Report of Urban Development for the City of Sacramento, April 3, 2024). Starting in 2009, the City's Annual Reports began including a graphic that showed "HCP Fee Areas Remaining." The graphic shows lands remaining to pay fees under the Natomas Basin HCP, including 121.68 acres of the project area (2023 Annual Report, Attachment E). Over the years since 2009, similar attachments to the City's annual reports have shown that the total area graded under the HCP, plus the identified fee areas remaining, totaled less than 8,050 acres. In other words, the City's records show a surplus of acreage of HCP coverage not attributed to a particular project or parcel. The current 2023 HCP Annual Report shows a surplus of 358 acres.

In order to generate payment of all fees that were anticipated under the Natomas Basin HCP to come from City development, projects will need to utilize the surplus HCP coverage and pay fees



under the Natomas Basin HCP. A portion of that surplus may be available for use by the portion of the project site that is not currently within the HCP permit area.

Since 2003, the Natomas Basin Conservancy has acquired more than 5,000 acres of land, utilizing the proceeds of the Natomas Basin HCP fees collected by the City, Sutter County, and pursuant to the Metro Air Park HCP. In 2022, the Natomas Basin Conservancy reached an important milestone. The Natomas Basin HCP required that, by the end of the 50-year lifespan of the Natomas Basin HCP, one habitat block within the reserve system must be at least 2,500 acres in size. The 2,500-acre block was completed in 2022 with acquisition of the Lauppe North tract. The City's processing and tracking of HCP fees have played a significant role in helping the Natomas Basin Conservancy accomplish this goal in less than 20 years.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts related to biological resources is based on implementation of the proposed project in comparison to existing conditions and the standards of significance presented above.

4.4-1 Impacts to special-status plant species, either directly (e.g., threaten to eliminate a plant community) or through substantial habitat modifications. Based on the analysis below and with implementation of mitigation, the impact is less than significant.

The project site, historically used as hay fields and potentially planted intermittently with rice fields from 1937 to 2020, currently consists of fallow agricultural land, devoid of structures. Unnamed drainage canals proceed through the site generally in a north-to-south direction in both the site's western and eastern portions. Unimproved dirt roads provide access to the interior of the project site, which is subdivided into multiple agricultural plots. Within the northern portion of the study area, Bayou Way, a paved road consisting of two vehicle lanes, meanders in a west-to-east direction through the site.

As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to special-status plant species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact special-status plants. Because installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to special-status plant species, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

Of the 20 special-status plant species with potential to occur in the Regional Study Area, the following six species were determined to have low potential to occur in the project site: pappose tarplant, Heckard's pepper-grass, San Joaquin spearscale, woolly rose-mallow, palmate-bracted bird's beak, and Sanford's arrowhead. Of the aforementioned species, only Sanford's arrowhead is a Covered Species under the Natomas Basin HCP.



As detailed in Table 4.4-2, habitat within the project site for all of the aforementioned plant species is considered low quality. In addition, the ongoing agriculture-related site disturbance limits the potential for any of the species to occur within the site. None of the plant species were identified as part of the comprehensive field surveys conducted as part of the BRA, which were conducted within the blooming period of all special-status plant species identified in the literature and database review. Thus, pappose tarplant, Heckard's pepper-grass, San Joaquin spearscale, woolly rose-mallow, palmate-bracted bird's beak, and Sanford's arrowhead are not anticipated to occur within the proposed industrial park footprint of the project site.

However, given enough time, the possibility of special-status plants becoming established in areas where suitable habitat exists cannot be ruled out. As such, special-status plant species could occur within the on-site grasses and canals of the industrial park footprint and nonparticipating parcels prior to future commencement of construction. Thus, without a preconstruction survey to confirm the presence or absence of the aforementioned plant species, buildout of the project site could potentially impact protected plant species.

Based on the above, development of the proposed industrial park and nonparticipating parcels could result in impacts to special-status plant species, either directly or through substantial habitat modifications, and a **significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level. Although only a portion of the industrial park footprint and nonparticipating parcels are within the Natomas Basin HCP permit area, the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP would be applied to all project construction activities to address potential impacts to special-status plant species with potential to occur on-site, including those not covered under the Natomas Basin HCP. The applicable Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP have been included in this chapter largely as they are written in the Natomas Basin HCP, including references to CDFW's previous name, which was the California Department of Fish and Game, or "CDFG." Where appropriate, the measures have been adapted consistent with the Natomas Basin HCP to apply to the project-specific context.

Industrial Park and Nonparticipating Parcels

4.4-1(a) *Prior to the issuance of any grading permit and commencement of ground-disturbing activities associated with development of the industrial park footprint and nonparticipating parcels, the following Natomas Basin Habitat Conservation Plan (HCP) Take Avoidance, Minimization, and Mitigation Measures shall be implemented, as applicable:*

Natomas Basin HCP Section V.A.1:

Not less than 30 days or more than 6 months prior to commencement of construction activities, a pre-construction survey of the portion of the site to be disturbed shall be conducted to determine the status and



presence of, and likely impacts to, all Covered Species on the site. However, pre-construction surveys for an individual species may be completed up to one year in advance if the sole period for reliable detection of that species is between May 1 and December 31. The project proponent will be responsible for contracting with qualified biological consultants to carry out the pre-construction surveys, and as necessary, to implement specific take minimization, and other Conservation Measures set forth in the Natomas Basin HCP and approved by the Wildlife Agencies.

The results of the pre-construction surveys along with recommended take minimization measures shall be documented in a report and shall be submitted to the City, USFWS, CDFG and the Natomas Basin Conservancy. Based upon the survey results, the City will identify applicable take avoidance and other site-specific Conservation Measures, consistent with the Natomas Basin HCP, required to be carried out on the site. The approved pre-construction survey documents and list of Conservation Measures will be submitted by the developer to the City to demonstrate compliance with the Natomas Basin HCP.

Natomas Basin HCP Section V.A.5.o:

If Sanford's arrowhead plants are identified through a pre-construction survey, the City shall provide notice to USFWS, CDFG and the California Native Plant Society. Under such circumstances, the development proponent shall allow the transplantation of plants prior to site disturbance.

Natomas Basin HCP Section V.A.5.p:

Prior to issuance of a grading permit, the City shall require a pre-construction survey. If such survey determines Boggs Lake hedgehyssop, Sacramento orcutt grass, Slender orcutt grass, Colusa grass, or legenere are present, the City shall require the developer to consult with USFWS to determine appropriate measures to avoid and minimize loss of individuals.

4.4-1(b)

With respect to special-status plant species not covered under the Natomas Basin HCP, prior to the commencement of construction activities associated with the nonparticipating parcels, a qualified biologist shall conduct preconstruction protocol-level surveys for special-status plants with potential to occur on-site. The surveys may be conducted concurrently with the preconstruction surveys set forth by Mitigation Measure 4.4-1(a). The results of the surveys shall be submitted for review and approval to the City of Sacramento Community Development Department and shall be valid for two years. If special-status plant species are not found, further mitigation shall not be required.



If any special-status plants are located during the foregoing surveys, the appropriate agency (i.e., CDFW and/or USFWS, depending on the species) shall be consulted to develop appropriate mitigation for the proposed project for expected impacts. If special-status plants would be impacted, as determined by the qualified biologist, a mitigation plan shall be developed in coordination with the appropriate agency and submitted for review and approval to the City of Sacramento Community Development Department. Mitigation shall include that if special-status perennial species are found in areas proposed for disturbance, the plants shall be dug up and transplanted into a suitable avoided area on-site prior to construction. If the plant found is an annual, then mitigation shall consist of collecting seed-bearing soil and spreading it into a suitable location.

4.4-2 Have a substantial adverse effect, either directly or through habitat modifications, on monarch butterfly. Based on the analysis below, the impact is *less than significant*.

The footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats. As such, the potential for impacts to monarch butterfly that could occur from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact monarch butterfly. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to monarch butterfly, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

Adult monarch butterflies require a diversity of blooming nectar resources during breeding and migration (spring through fall). Monarchs also need milkweed (for both oviposition and larval feeding) embedded within the diverse nectaring habitat. Pursuant to the BRA, monarch butterflies are unlikely to reside within the proposed industrial park footprint, as the area's ongoing agriculture-related site disturbance limits the availability of suitable habitat to accommodate the species. Similarly, the nonparticipating parcels would also be unlikely to support monarch butterflies, as the parcels also feature ongoing site disturbance related to agriculture.

Based on the above, neither the proposed industrial park, nor future development of the nonparticipating parcels would have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (monarch butterfly) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a ***less-than-significant*** impact would occur.

Mitigation Measure(s)

None required.



4.4-3 Have a substantial adverse effect, either directly or through habitat modifications, on giant garter snake. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Giant garter snake is a Covered Species under the Natomas Basin HCP. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to the species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact giant garter snake. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to giant garter snake, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

Giant garter snake was not observed during any of five surveys conducted as part of the BRA. However, the CNDDDB contains several records documenting the species within the previous 20 years as having occurred in the West Drainage Canal in the project vicinity. The canal hydrologically connects to Fisherman's Lake, which contains a known population of giant garter snake.

Habitat for the species in the project site consists of interconnected drainage canals (i.e., Canal-1, Canal-2, and Canal-3), which are inundated under typical circumstances during the summer, as they collect irrigation and stormwater runoff from surrounding lands during the growing season. All canals were observed during the BRA field surveys to contain some cover of emergent aquatic vegetation dominated by floating water primrose (*Ludwigia peploides*), with small areas of cattail, and common tule. Although the cover of the emergent aquatic species was low at the time of the April 2022 survey, large areas of open water had remnants of floating water primrose from the previous growing season, indicating that the cover of giant garter snake may be substantial in mid-summer.

The BRA found that habitat in the project site is unlikely to support a permanent giant garter snake population, as suitable burrows do not occur within the site and the project site is subject to ongoing high levels of vegetation management. For instance, much of the on-site canal banks are vertical and undercut with few visible burrows suitable for the species. Additionally, the tops of the canal banks are highly compacted and show evidence of repeated mowing and grading along many reaches. Furthermore, burrows capable of supporting overwintering giant garter snake were not observed during the April 2022 survey.

Nevertheless, the on-site habitat, while marginal, still provides connectivity to occupied sites to the north and south of the site within the American Basin. Though not ideal for giant garter snake, the canals within site could support transient individuals on a temporary basis. As such, in the event the species is present in the upland areas adjacent to the on-site canals, construction activities associated with the proposed industrial park and future development of the nonparticipating parcels could directly impact giant garter snake.



Based on the above, development of the proposed industrial park and future buildout of the nonparticipating parcels could have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (giant garter snake) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a **significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level. Although only a portion of the project site is within the Natomas Basin HCP permit area, the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP would be applied to all project construction activities to address potential impacts to giant garter snake. In addition, as discussed under Impact 4.4-14, the proposed project would be subject to applicable mitigation fees for land acquisition, enhancement, and management and monitoring activities, which are assessed on new development within the Natomas Basin HCP permit area. The applicable Take Avoidance, Minimization, and Mitigation Measures have been included in this chapter and have been adapted consistent with the Natomas Basin HCP, where appropriate, to apply to the project-specific context.

Industrial Park and Nonparticipating Parcels

4.4-3 *Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures have been implemented:*

Natomas Basin HCP Section V.A.5.a:

1. *Within the Natomas Basin, all construction activity involving disturbance of habitat, such as site preparation and initial grading, is restricted to the period between May 1 and September 30. This is the active period for the giant garter snake and direct mortality is lessened, because snakes are expected to actively move and avoid danger.*
2. *Pre-construction surveys for giant garter snake, as well as other NBHCP Covered Species, must be completed for all development projects by a qualified biologist approved by USFWS. If any giant garter snake habitat is found within a specific site, the following additional measures shall be implemented to minimize disturbance of habitat and harassment of giant garter snake, unless such project is specifically exempted by USFWS.*
3. *Between April 15 and September 30, all irrigation ditches, canals, or other aquatic habitat should be completely dewatered, with no puddled water remaining, for at least 15 consecutive days prior to the excavation or filling in of the dewatered habitat. Make sure dewatered habitat does not continue to support giant garter snake prey, which could detain or attract snakes into the area. If a site cannot be completely dewatered, netting and salvage of prey items may be*



- necessary. This measure removes aquatic habitat component and allows giant garter snake to leave on their own.
4. For sites that contain giant garter snake habitat, no more than 24-hours prior to start of construction activities (site preparation and/or grading), the project area shall be surveyed for the presence of giant garter snake. If construction activities stop on the project site for a period of two weeks or more, a new giant garter snake survey shall be completed no more than 24-hours prior to the re-start of construction activities.
 5. Confine clearing to the minimal area necessary to facilitate construction activities. Flag and designate avoided giant garter snake habitat within or adjacent to the project as Environmentally Sensitive Areas. This area shall be avoided by all construction personnel.
 6. Construction personnel completing site preparation and grading operations shall receive USFWS approved environmental awareness training. This training instructs workers on how to identify giant garter snakes and their habitats, and what to do if a giant garter snake is encountered during construction activities. During this training an on-site biological monitor shall be designated.
 7. If a live giant garter snake is found during construction activities, immediately notify the USFWS and the project's biological monitor. The biological monitor, or his/her assignee, shall do the following:
 - a. Stop construction in the vicinity of the snake. Monitor the snake and allow the snake to leave on its own. The monitor shall remain in the area for the remainder of the work day to make sure the snake is not harmed or if it leaves the site, does not return. Escape routes for giant garter snake should be determined in advance of construction and snakes should always be allowed to leave on their own. If a giant garter snake does not leave on its own within 1 working day, further consultation with USFWS is required.
 8. Upon locating dead, injured or sick threatened or endangered wildlife species, the project applicant must notify within 1 working day the Service's Division of Law Enforcement (2800 Cottage Way, Sacramento CA 95825) or the Sacramento Fish and Wildlife Office (2800 Cottage Way, Room W2605, Sacramento, CA 95825, telephone 916 414-6600). Written notification to both offices must be made within 3 calendar days and must include the date, time, and location of the finding of a specimen and any other pertinent information.
 9. Fill or construction debris may be used by giant garter snake as an over-wintering site. Therefore, upon completion of construction activities remove any temporary fill and/or construction debris from the site. If this material is situated near



undisturbed giant garter snake habitat and it is to be removed between October 1 and April 30, it shall be inspected by a qualified biologist to assure that giant garter snake are not using it as hibernaculae.

10. *No plastic, monofilament, jute, or similar erosion control matting that could entangle snakes will be placed on a project site when working within 200 feet of snake aquatic or rice habitat. Possible substitutions include coconut coir matting, tactified hydroseeding compounds, or other material approved by the Wildlife Agencies.*

4.4-4 Have a substantial adverse effect, either directly or through habitat modifications, on northwestern pond turtle. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Northwestern pond turtle is a Covered Species under the Natomas Basin HCP. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to the species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact northwestern pond turtle. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to northwestern pond turtle, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

With respect to on-site upland areas that could support northwestern pond turtle, the top of the canal banks within the project site are highly compacted and show evidence of repeated mowing and grading along several reaches. Such conditions limit the potential for the species to occur within areas upland of the on-site canals. In addition, adjacent upland habitats are marginal, as much of the canal banks are vertical and undercut. Nevertheless, northwestern pond turtle was observed within the project site during three field surveys conducted as part of the BRA, specifically in Canal-2 and Canal-3. Individuals were observed sunning on floating debris and/or vegetation within the canals. Given the BRA's confirmation of northwestern pond turtle in the project site, the potential for the species to be present within the uplands adjacent to the canals cannot be entirely ruled out. In the event the species is present, construction activities associated with the proposed industrial park and future development of the nonparticipating parcels could directly impact northwestern pond turtle.

Based on the above, development of the proposed industrial park and future buildout of the nonparticipating parcels could have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (northwestern pond turtle) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a ***significant*** impact could occur.



Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level. Although only a portion of the project site is within the Natomas Basin HCP permit area, the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP would be applied to all project construction activities to address potential impacts to northwestern pond turtle. The applicable Take Avoidance, Minimization, and Mitigation Measures have been included in this chapter and have been adapted consistent with the Natomas Basin HCP, where appropriate, to apply to the project-specific context. Additionally, as detailed below, potential impacts to northwestern pond turtle would be further minimized through compliance with Mitigation Measure 4.4-3, which includes provisions for mitigation impacts to giant garter snake that would simultaneously address impacts to northwestern pond turtle.

Industrial Park and Nonparticipating Parcels

4.4-4(a) *Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:*

Natomas Basin HCP Section V.A.5.j:

1. *Take of the northwestern pond turtle as a result of habitat destruction during construction activities, including the removal of irrigation ditches and drains, and during ditch and drain maintenance, will be minimized by the dewatering requirement described above for giant garter snake (see Section 5.a.(3)).*

4.4-4(b) *Implement Mitigation Measure 4.4-1(a).*

4.4-5 Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Swainson's hawk is a Covered Species under the Natomas Basin HCP. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to the species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact Swainson's hawk. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to Swainson's hawk, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

Swainson's hawk was observed during the April and May 2022 surveys. Although nesting activity was not detected during these surveys, in the event the species is nesting within the project site, which contains limited nesting habitat, the proposed



project could directly affect the success of nesting hawks through destruction of pre-existing nests, active nests, and young or visual and/or audible disturbance from construction activities. Furthermore, the BRA found that high-quality foraging habitat occurs on-site, which would be converted to industrial uses as part of the proposed project. As such, the project would result in potential impacts related to the loss of Swainson's hawk foraging habitat.

As previously discussed, this chapter applies the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP to address the majority of identified potential impacts that could occur as a result of the proposed project to special-status plant and wildlife species. However, a portion of the identified Swainson's hawk foraging habitat within the project site occurs outside of the Natomas Basin HCP permit area.

In the event that a portion of the City's surplus HCP coverage acreage is made available to the non-HCP covered portion of the project site, the applicant could address impacts to Swainson's hawk foraging habitat through payment of the Natomas Basin HCP mitigation fees. Conversely, if the aforementioned option is not available to the project, the project would be required to address potential impacts to Swainson's hawk foraging habitat through preserving habitat elsewhere in compliance with applicable CDFW guidelines. As part of such compliance, the project applicant would be required to establish off-site mitigation lands and fund an endowment for perpetual preservation of same.

Based on the above, development of the proposed industrial park and future buildout of the nonparticipating parcels could have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (Swainson's hawk) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a **significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level. Although only a portion of the project site is within the Natomas Basin HCP permit area, the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP would be applied to all project construction activities to address potential impacts to Swainson's hawk. The applicable Take Avoidance, Minimization, and Mitigation Measures have been included in this chapter and have been adapted consistent with the Natomas Basin HCP, where appropriate, to apply to the project-specific context.

In addition, to address potential impacts to Swainson's hawk foraging habit that occurs within on-site areas outside of the Natomas Basin HCP permit area, the project applicant would implement Mitigation Measure 4.4-5(b), which would require the applicant to pay the Natomas Basin HCP mitigation fees for land acquisition, enhancement, and management and monitoring activities, should a portion of the City's surplus HCP coverage acreage be made available to the project. In the event that the proposed project cannot mitigate potential impacts to Swainson's hawk foraging habitat through such means, the applicant would be required to preserve Swainson's hawk foraging habitat elsewhere, in accordance with applicable CDFW



guidelines. Preservation of foraging habitat for Swainson's hawk would additionally address potential impacts to the foraging habitat of other protected species that have potential to occur within Swainson's hawk foraging habitat (i.e., burrowing owl and other birds and raptors protected under the MBTA and CFGC). To ensure overall preservation of Swainson's hawk foraging habitat at a 1:1 ratio, the proposed project would also be subject to Mitigation Measure 4.2-1, which is detailed in the Agricultural Resources chapter of this EIR and necessitates preservation of off-site farmland at a ratio of one Farmland acre converted to urban land uses outside the Natomas Basin HCP policy area to 0.5-acre preserved. Combined with the requirements of Mitigation Measure 4.4-5(b), the proposed project would preserve Swainson's hawk foraging habitat at a 1:1 ratio.

Industrial Park and Nonparticipating Parcels

4.4-5(a) *Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:*

Natomas Basin HCP Section V.A.5.b:

Measures to Reduce Nest Disturbance

1. *Prior to the commencement of development activities, a pre-construction survey shall be completed to determine whether any Swainson's hawk nest trees will be removed on-site, or active Swainson's hawk nest sites occur on or within ½ mile of the development site. These surveys shall be conducted according to the Swainson's Hawk Technical Advisory Committee's (May 31, 2000) methodology or updated methodologies, as approved by the Service and CDFG, using experienced Swainson's hawk surveyors.*
2. *If breeding Swainson's hawks (i.e. exhibiting nest building or nesting behavior) are identified, no new disturbances (e.g., heavy equipment operation associated with construction) will occur within ½ mile of an active nest between March 15 and September 15, or until a qualified biologist, with concurrence by CDFG, has determined that young have fledged or that the nest is no longer occupied. If the active nest site is located within 1/4 mile of existing urban development, the no new disturbance zone can be limited to the ¼ mile versus ½ mile. Routine disturbances such as agricultural activities, commuter traffic, and routine facility maintenance activities within ½ mile of an active nest are not restricted.*
3. *Where disturbance of a Swainson's hawk nest cannot be avoided, such disturbance shall be temporarily avoided (i.e., defer construction activities until after the nesting season) and then, if unavoidable, the nest tree may be destroyed during the non-nesting season. For purposes of this provision the Swainson's hawk nesting season is defined as March 15 to*



September 15. If a nest tree (any tree that has an active nest in the year the impact is to occur) must be removed, tree removal shall only occur between September 15 and February 1.

4. If a Swainson's hawk nest tree is to be removed and fledglings are present, the tree may not be removed until September 15 or until the California Department of Fish and Game has concurred that the young have fledged and are no longer dependent upon the nest tree.
5. If construction or other project related activities which may cause nest abandonment or forced fledgling are proposed within the ¼ mile buffer zone, intensive monitoring (funded by the project sponsor) by a Department of Fish and Game approved raptor biologist will be required. Exact implementation of this measure will be based on specific information at the project site.

4.4-5(b) To address potential impacts to Swainson's hawk foraging habitat that occurs on-site, but outside of the Natomas Basin HCP permit area, the project applicant shall pay the Natomas Basin HCP mitigation fees for land acquisition, enhancement, and management and monitoring activities, should a portion of the City's surplus HCP coverage be made available to the proposed project.

OR

Pursuant to CDFW guidelines, the applicant shall preserve Swainson's hawk foraging habitat at a 0.5:1 ratio. The preserved habitat shall be at a location approved by the CDFW. Preservation may occur through purchase of conservation easements or fee title of lands with suitable Swainson's hawk foraging habitat (consistent with CDFW guidelines).

4.4-6 Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl. Based on the analysis below and with implementation of mitigation, the impact is less than significant.

Burrowing owl is a Covered Species under the Natomas Basin HCP. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to the species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact burrowing owl. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to burrowing owl, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

Pursuant to the BRA, most regional records for burrowing owl within the greater project vicinity are east of SR 99. However, recent CNDDDB records document occurrences of



the species at the Sacramento International Airport to the northwest of the project site. As such, burrowing owl could potentially occur over a wide range within the project vicinity during migration and winter in appropriate open habitats and disturbed areas.

Although suitable burrows and ground-squirrels were not observed during the field surveys conducted for the BRA, the project site contains some open disturbed areas, primarily in the construction staging area along the south side of Bayou Way and west of Metro Air Parkway, which provide marginal habitat for burrowing owl. In addition, in the event that ground squirrels move into the property from adjacent undeveloped land and establish burrows prior to project construction activities, burrowing owl could use burrows within the site. Therefore, the proposed project could directly impact the species through destruction of burrows containing overwintering or nesting individuals or visual and/or audible disturbance from construction activities.

Based on the above, development of the proposed industrial park and future buildout of the nonparticipating parcels could have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (burrowing owl) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a **significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level. Although only a portion of the project site is within the Natomas Basin HCP permit area, the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP would be applied to all project construction activities to address potential impacts to burrowing owl. The applicable Take Avoidance, Minimization, and Mitigation Measures have been included in this chapter and have been adapted consistent with the Natomas Basin HCP, where appropriate, to apply to the project-specific context.

Industrial Park and Nonparticipating Parcels

4.4-6 *Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:*

Natomas Basin HCP Section V.A.5.h:

1. *Prior to the initiation of grading or earth disturbing activities, the applicant/developer shall hire a CDFG approved qualified biologist to perform a pre-construction survey of the site to determine if any burrowing owls are using the site for foraging or nesting. The pre-construction survey shall be submitted to the City prior to the developer's commencement of construction activities and a mitigation program shall be developed and agreed to by the City and developer prior to initiation of any physical disturbance on the site.*
2. *Occupied burrows shall not be disturbed during nesting season (February 1 through August 31) unless a qualified biologist*



approved by the CDFG verifies through non-invasive measures that either: 1) the birds have not begun egg-laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

3. If nest sites are found, the USFWS and CDFG shall be contacted regarding suitable mitigation measures, which may include a 300 foot buffer from the nest site during the breeding season (February 1 - August 31), or a relocation effort for the burrowing owls if the birds have not begun egg-laying and incubation or the juveniles from the occupied burrows are foraging independently and are capable of independent survival. If on-site avoidance is required, the location of the buffer zone will be determined by a qualified biologist. The developer shall mark the limit of the buffer zone with yellow caution tape, stakes, or temporary fencing. The buffer will be maintained throughout the construction period.
4. If relocation of the owls is approved for the site by USFWS and CDFG, the developer shall hire a qualified biologist to prepare a plan for relocating the owls to a suitable site. The relocation plan must include: (a) the location of the nest and owls proposed for relocation; (b) the location of the proposed relocation site; (c) the number of owls involved and the time of year when the relocation is proposed to take place; (d) the name and credentials of the biologist who will be retained to supervise the relocation; (e) the proposed method of capture and transport for the owls to the new site; (f) a description of the site preparations at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one-time or long-term vegetation control, etc.); and (g) a description of efforts and funding support proposed to monitor the relocation.

Relocation options may include passive relocation to another area of the site not subject to disturbance through one way doors on burrow openings, or construction of artificial burrows in accordance with the CDFG's October 17, 1995, Staff Report on Burrowing Owls Mitigation (see Appendix D).

5. Where on-site avoidance is not possible, disturbance and/or destruction of burrows shall be offset through development of suitable habitat on TNBC upland reserves or in other suitable preserved uplands. Such habitat shall include creation of new burrows with adequate foraging area (a minimum of 6.5 acres) or 300 foot radii around the newly created burrows. Additional habitat design and mitigation measures are described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation.



4.4-7 Have a substantial adverse effect, either directly or through habitat modifications, on Aleutian cackling goose, white-faced ibis, and tricolored blackbird. Based on the analysis below, the impact is *less than significant*.

Aleutian cackling goose, white-faced ibis, and tricolored blackbird are Covered Species under the Natomas Basin HCP. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to the species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact Aleutian cackling goose, white-faced ibis, and tricolored blackbird. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to the foregoing species, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

With respect to Aleutian cackling goose, the nearest CNDDDB occurrence is 28 miles to the north of the project site, and the species has not been recorded within the Natomas Basin. Aleutian cackling goose sometimes occurs singly or in small numbers with more numerous Canada geese, which often feed in agricultural fields, especially during winter months. However, pursuant to the BRA, on-site habitat for the species is of low quality. Thus, Aleutian cackling goose is not anticipated to occur on-site. Furthermore, although the proposed industrial park would include stormwater retention/detention areas primarily along the western and southern project site boundaries, which could attract avian species such as Aleutian cackling goose and expose them to collisions with aircraft associated with the Sacramento International Airport, the project includes a Wildlife Hazard Management Plan to prevent such aviation hazards from occurring, as required by Mitigation Measure 4.7-5(a). The Wildlife Hazard Management Plan would be prepared by a qualified wildlife hazard damage biologist, subject to review by the Sacramento County Airport System, and include various provisions to reduce bird attractants within the retention/detention areas, such as refuse and birdfeed. Based on the above, through incorporation of the Wildlife Hazard Management Plan, Aleutian cackling goose would not occur within the retention/detention areas during project operation, and a less-than-significant impact would occur.

With respect to white-faced ibis, the nearest CNDDDB-documented occurrences are eight miles to the west of the project site, though the species is known to be present in high numbers at the Yolo Bypass five miles to the southwest. Although white-faced ibis has limited potential to forage within the project site at the margins of canals or adjacent agricultural areas, the species is anticipated to forage elsewhere while construction disturbance is occurring. In addition, the project site does not contain habitat to support nesting. Based on the above, white-faced ibis is not anticipated to occur on-site, and a less-than-significant impact would occur.

With regard to tricolored blackbird, nesting habitat does not occur within the project site. In addition, similar to white-faced ibis, tricolored blackbird is anticipated to forage elsewhere while construction disturbance is occurring.



Based on the above, development of the proposed industrial park and future buildout of the nonparticipating parcels would not have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (Aleutian cackling goose, white-faced ibis, and tricolored blackbird) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a ***less-than-significant*** impact could occur.

Mitigation Measure(s)

None required.

4.4-8 Have a substantial adverse effect, either directly or through habitat modifications, on loggerhead shrike. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Loggerhead shrike is a Covered Species under the Natomas Basin HCP. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats, the potential for impacts to the species from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact loggerhead shrike. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to loggerhead shrike, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

Although the nearest documented CNDDDB occurrences of loggerhead shrike are more than 50 miles from the project site, the BRA found that the species is underreported in the CNDDDB, as loggerhead shrike occurs sparingly in the Natomas Basin. Although the species is unlikely to be present on-site due to the lack of scrubby habitat to accommodate the species, the BRA determined that the possibility of active loggerhead shrike nests occurring on-site could not be ruled out. In addition, the BRA found that the proposed project could potentially impact the species through the loss of suitable foraging habitat within the site. As such, the project could result in impacts to loggerhead shrike.

Based on the above, development of the proposed industrial park and future buildout of the nonparticipating parcels would not have a substantial adverse effect, either directly or through habitat modifications, on a wildlife species (loggerhead shrike) identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Thus, a ***less-than-significant*** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a ***less-than-significant*** level. Although only a portion of the project site is within the Natomas Basin HCP permit area, the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP would be applied to all project construction activities to address potential impacts to loggerhead shrike. As



discussed under Impact 4.4-5, preservation of foraging habitat for Swainson's hawk through Mitigation Measures 4.4-5(a) and 4.4-5(b) would additionally address potential impacts to the foraging habitat of other protected species that have potential to occur within Swainson's hawk foraging habitat, such as loggerhead shrike. The applicable Take Avoidance, Minimization, and Mitigation Measures have been included in this chapter and have been adapted consistent with the Natomas Basin HCP, where appropriate, to apply to the project-specific context.

Industrial Park and Nonparticipating Parcels

4.4-8 *Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall ensure that the following Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measure has been implemented:*

Natomas Basin HCP Section V.A.5.g:

1. *Prior to issuance of a grading permit, the City shall require a pre-construction survey.*
2. *If surveys identify an active loggerhead shrike nest that will be impacted by development, the developer shall install brightly colored construction fencing that establishes a boundary 100 feet from the active nest. No disturbance associated with development shall occur within the 100 foot fenced area during the nesting season of March 1 through July 31. A qualified biologist, with concurrence of USFWS must determine young have fledged or that the nest is no longer occupied prior to disturbance of the nest site.*

4.4-9 Have a substantial adverse effect, either directly or through habitat modifications, on northern harrier, white-tailed kite, song sparrow, and other nesting birds and raptors protected under the MBTA and CFGC. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats. As such, the potential for impacts to northern harrier, white-tailed kite, song sparrow "Modesto" population, and other nesting birds and raptors protected under the MBTA and CFGC that could occur from developing either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact the aforementioned species. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to the aforementioned species, either directly or through substantial habitat modifications.

Industrial Park and Nonparticipating Parcels

The vegetation communities within the project site and proposed off-site areas provide suitable nesting habitat to accommodate songbirds and raptors that are not covered



under the Natomas Basin HCP, but which are, nevertheless, protected under the MBTA and CFGC. Such species include northern harrier, white-tailed kite, and song sparrow, as well as other avian species. In regard to northern harrier, the species was observed foraging on and flying over the project site during two of the five surveys conducted as part of the BRA. Thus, the species is considered present. In the event northern harrier is nesting within the site prior to project construction, the BRA concluded that the proposed project could directly affect the success of nesting northern harrier through destruction of active nests and young or visual and/or audible disturbance from construction activities. The project could also potentially impact species through the loss of suitable foraging habitat.

With respect to white-tailed kite, although nesting habitat is limited and composed of relatively few Goodding's black willow, valley oak, and other trees along the canal and ditch banks, in the event the species is nesting within the project site, the BRA found that the proposed project could directly affect the success of nesting white-tailed kite through destruction of pre-existing nests, active nests, and young or visual and/or audible disturbance from construction activities. In addition, the project site contains foraging habitat that could support the species, which would be converted as part of project construction activities. However, it should be noted that with implementation of Mitigation Measure 4.4-5(a) of this EIR, potential impacts to foraging habitat would be reduced to a less-than-significant level.

With respect to song sparrow, while population levels have dropped by 90 percent from historical highs, the "Modesto" population of song sparrow has been recorded in sparsely vegetated margins of canals, such as those associated with the project site. Although the on-site habitat to support nesting activities for song sparrow is limited, in the event the species is present within the project site, the BRA found that the proposed project could directly affect the success of nesting song sparrow through destruction of active nests and young or visual and/or audible disturbance from construction activities.

Similar to potential impacts to northern harrier, white-tailed kite, and song sparrow, most native songbirds and raptors have baseline protections under the CFGC and guidelines for protections under the federal MBTA. Each prohibits the intentional killing, collecting, or trapping of covered species, including their active nests (those with eggs or young). Given the presence of various trees within the project site which provide suitable nesting habitat to native songbirds and raptors, the proposed project could result in potential impacts to other species protected under the CFGC and MBTA.

With respect to project operation, as discussed under Impact 4.4-7, the project includes a Wildlife Hazard Management Plan to prevent aviation hazards from occurring to protected avian species. The Wildlife Hazard Management Plan would be prepared by a qualified wildlife hazard damage biologist, subject to review by the Sacramento County Airport System, and include various provisions to reduce bird attractants within the retention/detention areas, such as refuse and birdfeed. Based on the above, through incorporation of the Wildlife Hazard Management Plan, protected nesting birds and raptors would not occur within the retention/detention areas during project operation, and a less-than-significant impact would occur.



Based on the above, the project could have a substantial adverse effect during project construction, either directly or through habitat modifications, on nesting songbirds and raptor species protected under the MBTA and CFGC. Thus, a **significant** impact could occur.

Mitigation Measure(s)

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

Industrial Park and Nonparticipating Parcels

4.4-9(a) **Raptors:** *If ground disturbance or other construction activities are proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors protected under the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA) shall be conducted by a qualified biologist within seven days prior to the beginning of construction activities in order to identify active nests. The survey shall be conducted within the proposed construction area and all accessible areas within 0.5-mile. A report summarizing the results of the survey shall be submitted for review and approval to the City of Sacramento Community Development Department. If active nests are not found during the focused survey(s), additional mitigation shall not be required. For any period of project inactivity of more than seven days, the qualified biologist shall conduct a field check of the previously surveyed area before construction activities recommence to confirm nesting raptors have not entered during the interim.*

If active raptor nests are found within 0.5-mile of a construction area, construction shall not commence within 0.5-mile of the nest until a qualified biologist determines that the young have fledged, or the biologist has determined that the nesting attempt has failed. If construction activities within 0.5-mile of the nest are necessary, the qualified biologist shall be consulted to determine if the nest buffer can be reduced. The applicant and qualified biologist shall jointly determine the nest avoidance buffer, and what (if any) nest monitoring is necessary.

If an active raptor nest is found within the project area prior to construction and is in a tree that is proposed for removal, then the project applicant shall implement additional mitigation recommended by a qualified biologist based on CDFW guidelines and obtain any required permits from CDFW.

4.4-9(b) **Songbirds:** *If ground disturbance or other construction activities are proposed during the nesting season (February 1 to August 31), a focused survey for birds protected under the MBTA shall be conducted by a qualified biologist within seven days prior to the beginning of construction activities in order to identify active nests. The survey shall be conducted within the proposed construction area and all accessible areas within 500 feet. A report summarizing the results of the survey*



shall be submitted for review and approval to the City of Sacramento Community Development Department. If active nests are not found during the focused survey(s), additional mitigation shall not be required. For any period of project inactivity of more than seven days, the qualified biologist shall conduct a field check of the previously surveyed area before construction activities recommence to confirm nesting songbirds have not entered during the interim.

If active special-status species nests/nesting colonies are located during the survey, the project applicant shall work with a qualified biologist to determine a suitable avoidance buffer and the extent and duration of nest monitoring needed. The perimeter of the protected area shall be indicated by bright orange temporary fencing and signage. Construction activities and/or personnel shall not enter the protected area, except with approval of the biologist. If trees containing nests or burrows must be removed as a result of project implementation, removal shall be completed during the nonbreeding season (late September to January 31).

If active songbird nests are found, a qualified biologist shall establish a 100-foot non-disturbance buffer. The non-disturbance buffers may be reduced based on consultation and approval by the City of Sacramento Community Development Department. The perimeter of the protected area shall be indicated by bright orange temporary fencing. Construction activities or personnel shall not enter the protected area, except with approval of the biologist. If trees containing nests must be removed as a result of project implementation, removal shall be completed during the nonbreeding season (late September to January 31) or after the adults and young are not dependent on the nest site, as determined by a qualified biologist.

4.4-10 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. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The following discussions include a project-level analysis of potential impacts related to riparian habitat or other Sensitive Natural Community associated with development of the proposed industrial park, as well as a program-level analysis of potential impacts associated with the future buildout of the nonparticipating parcels. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to riparian habitat or other Sensitive Natural Communities.

Industrial Park

Construction of the proposed industrial park would result in direct impacts to 0.37-acre of Goodding's willow – red willow riparian woodland and forest, 0.07-acre of valley oak



riparian forest woodland, and 0.02-acre of California bulrush marsh. As previously discussed, the aforementioned vegetation communities are designated by the CDFW and CNPS as Sensitive Natural Communities.

To address the potential impact to the aforementioned vegetation communities, the project would require notification of CDFW, pursuant to the provisions set forth by CFGC Section 1600, et seq. If CDFW determines that the proposed activity would substantially affect fish and wildlife resources, a LSAA containing measures to protect affected fish and wildlife resources would be required, in accordance with CFGC Section 1600. The LSAA would be comprised of the final mitigation measure(s) and condition(s) mutually agreed upon by CDFW and the City. CDFW may choose to address potential temporary impacts to Sensitive Natural Communities through the LSAA process. Additionally, projects that require a LSAA often additionally require a permit from the USACE under Section 404 of the CWA. In such instances, the conditions of the Section 404 permit and the LSAA may overlap. Without compliance with the LSAA and/or Section 404 permit, a significant impact could occur.

Nonparticipating Parcels

A portion of the 0.75-acre of valley oak riparian forest woodland identified within the project site occurs within the nonparticipating parcels. As such, future buildout of the nonparticipating parcels with industrial uses could result in impacts to a Sensitive Natural Community. Furthermore, areas of the nonparticipating parcels that were not surveyed as part of the BRA could additionally contain vegetation communities designated by the CDFW and CNPS as Sensitive Natural Communities. As such, development of the nonparticipating parcels would require a review of vegetation communities that occur on-site, prior to the commencement of construction, to ensure that all Sensitive Natural Community acreages have been verified, with appropriate mitigation incorporated to address potential impacts. Without compliance with the aforementioned provisions, a significant impact could occur.

Conclusion

Based on the above, without compliance with the provisions of CFGC Section 1600, et seq., development of the proposed industrial park could have a substantial adverse effect on riparian habitat identified in local or regional plans, policies, regulations or by the CDFW or USFWS. In addition, without a review of vegetation communities that occur within the nonparticipating parcels prior to their development, future buildout of the parcels could result in impacts to a Sensitive Natural Community. Therefore, a **significant** impact could occur.

Mitigation Measure(s)

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

Industrial Park

4.4-10(a) *Prior to the commencement of ground-disturbing activities, the project applicant shall notify CDFW, pursuant to CFGC Section 1600. The notification shall include a description of all of the activities associated with the proposed industrial park, not just those associated with the drainages and/or riparian vegetation. Impacts shall be outlined in the*



notification and are expected to be in substantial conformance with the impacts to biological resources outlined in the Biological Resources Assessment prepared for the Airport South Industrial Project by Bargas Environmental Consulting. Impacts for each activity shall be broken down by temporary and permanent impacts. A description of the proposed mitigation for biological resource impacts shall be outlined per activity and then by temporary and permanent impact. Information regarding project-specific drainage and hydrology changes resulting from project implementation shall be provided, as well as a description of stormwater treatment methods. Minimization and avoidance measures shall be proposed, as appropriate, and may include preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas adjacent to open space areas with native seed, and installation of project-specific stormwater Best Management Practices (BMPs). Mitigation for impacts to Goodding's willow – red willow riparian woodland and forest, valley oak riparian forest woodland, and California bulrush marsh may include restoration or enhancement of resources on- or off-site, or any other method acceptable to CDFW. Mitigation shall not result in a net loss of a Sensitive Natural Community.

If CDFW determines through the course of the CFGC Section 1600 notification process that the project does not require a Lake or Streambed Alteration Agreement (LSAA) to address potential impacts to Goodding's willow – red willow riparian woodland and forest, valley oak riparian forest woodland, and California bulrush marsh, further mitigation regarding the aforementioned vegetation communities shall not be required. Written verification of the applicant's compliance with the Section 1600 LSAA process shall be submitted to the City of Sacramento Community Development Department.

Nonparticipating Parcels

- 4.4-10(b) *As part of any application associated with development of the nonparticipating parcels, the applicant shall ensure that a qualified biologist has reviewed areas proposed for disturbance to identify vegetation communities that occur in the development footprint and confirm the presence and acreages of Sensitive Natural Communities. If a Sensitive Natural Community would not be impacted, further mitigation shall not be required. The qualified biologist shall detail any recommendations to avoid impacts to identified Sensitive Natural Communities in a report, which shall be submitted for review and approval to the City of Sacramento Community Development Department.*
- 4.4-10(c) *If a Sensitive Natural Community is identified in a nonparticipating parcel for which a development application has been submitted, the applicant shall implement Mitigation Measure 4.4-10(a).*



4.4-11 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. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Wetlands are generally considered to be areas that are periodically or permanently inundated by surface or groundwater, and support vegetation adapted to life in saturated soil. Wetlands are recognized as important features on a regional and national level due to their high inherent value to fish and wildlife, use as storage areas for storm and flood waters, and water recharge, filtration, and purification functions. The USACE, CDFW, and RWQCB have jurisdiction over modifications to stream channels, river banks, lakes, and other wetland features. The USACE's jurisdiction is established through the provisions of Section 404 of the CWA, which prohibits the discharge of dredged or fill material into waters of the U.S. without a permit, including certain wetlands and unvegetated "other waters of the U.S." The jurisdictional authority of the RWQCB is established pursuant to Section 401 of the CWA, which typically requires a water quality certification when an individual or nationwide permit is issued by the USACE. The RWQCB also has jurisdiction over waters of the State under the Porter-Cologne Water Quality Control Act.

The following discussions include a project-level analysis of potential impacts related to State- or federally protected wetlands associated with development of the proposed industrial park and a program-level analysis of potential impacts associated with future buildout of the nonparticipating parcels. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse effect to federally or State-protected wetlands.

Industrial Park

Pursuant to the BRA, the proposed project is anticipated to have adverse effects, either directly or through indirect impacts, to wetlands that are potentially protected by the State and/or federal government, as the project includes grading of the entire industrial park footprint. Based upon the ARD, a total of 1.501 acres of tributary waters and 0.58-acre of other waters potentially subject to USACE jurisdiction occur within the grading limits of the proposed industrial park (see Figure 4.4-3). The foregoing acreages have not yet been formally verified by USACE and may be subject to change. In addition, the features are potential tributary waters and other waters of the State, subject to Central Valley RWQCB jurisdiction, as well as aquatic/riparian habitat, subject to requirements set forth by CWA Section 401 and CFGC Section 1600, respectively.

The proposed project would result in disturbance to a portion of the on-site tributary waters and other waters identified as part of the ARD. As shown in Figure 3-3 of the Project Description chapter of this EIR, the proposed Airport South Industrial Drive would include construction of a bridge and culvert across Canal 2, to the west of the Lot D detention/retention basin. In addition, construction of the proposed commercial lots (Parcels 6A through 6C and 7A through 7C) would result in disturbances to Ditch



1 and Ditch 2. For potential impacts to State- or federally protected wetlands, the proposed project would require a CWA Section 404 permit from the USACE and a Section 401 permit from the RWQCB and would be subject to all the conditions set forth therein. The project would also be subject to the regulations set forth under CFGC Section 1600, et seq., discussed above under Impact 4.4-10. Without compliance with the above, development of the proposed industrial park could result in a significant impact related to federally or State-protected wetlands.

Nonparticipating Parcels

As previously discussed, the nonparticipating parcels feature similar land cover and aquatic resources as those that occur in the proposed industrial park footprint (see Figure 4.4-3). As such, prior to the development of the nonparticipating parcels, an ARD would be required to identify potential jurisdictional tributary drainages and other waters of the U.S. The ARD would be required to be in accordance with applicable standards, such as the minimum standards set forth by the USACE South Pacific Division and Sacramento District Regulatory Program. Any identified aquatic features would be subject to the interpretation and verification of the USACE Sacramento District Regulatory Division. Thus, without compliance with the aforementioned requirements, a significant impact could occur.

Conclusion

Based on the above, without compliance with the provisions of CWA Sections 404 and 401, as well as CFGC Section 1600, et seq., development of the proposed industrial park could have a substantial adverse effect on riparian habitat identified in local or regional plans, policies, regulations or by the CDFW or USFWS. In addition, without of an ARD to identify aquatic resources that occur within the nonparticipating parcels prior to their development, future buildout of the parcels could result in impacts to State- and/or federally protected wetlands. Therefore, a **significant** impact could occur.

Mitigation Measure(s)

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

Industrial Park

4.4-11(a) *Prior to the issuance of grading permits, the project applicant shall submit the Aquatic Resources Delineation (ARD) prepared for the proposed project by Bargas Environmental Consulting to the U.S. Army Corps of Engineers (USACE) for a Preliminary Jurisdictional Determination and obtain authorization for the fill of jurisdictional waters of the U.S. through the Clean Water Act (CWA) Section 404 permitting process. Timing for compliance with the specific conditions of the Section 404 permit shall be pursuant to the conditions specified by USACE as part of permit issuance. Proof of compliance with the requirements established herein shall be submitted for review and approval to the City of Sacramento Community Development Department.*



- 4.4-11(b) *Prior to construction in any areas containing wetlands or waters of the U.S. and/or State, the project applicant shall obtain a water quality certification pursuant to Section 401 of the CWA. Any measures required as part of the issuance of the water quality certification shall be implemented.*
- 4.4-11(c) *Prior to construction in any areas containing wetlands or waters of the U.S. and/or State, the project applicant shall file a report of waste discharge with the Central Valley Regional Water Quality Control Board (RWQCB) for activities affecting wetlands or waters of the State that are not also under USACE jurisdiction, if applicable.*
- 4.4-11(d) *Implement Mitigation Measure 4.4-10(a).*

Nonparticipating Parcels

- 4.4-11(e) *As part of any application associated with development of the nonparticipating parcels, the applicant shall ensure that a qualified biologist has conducted an Aquatic Resources Delineation (ARD) for areas proposed for disturbance to identify potential waters of the U.S. and/or State. The ARD shall be conducted in accordance with the minimum standards set forth by the USACE South Pacific Division and Sacramento District Regulatory Program, as well as the Corps of Engineers Wetlands Delineation Manual, Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States or any manuals that supplement or replace these manuals.*

If potential waters of the U.S. and/or State are not identified, further mitigation shall not be required. The ARD shall be submitted for review and approval to the City of Sacramento Community Development Department and USACE Sacramento District Regulatory Division.

- 4.4-11(f) *If waters of the U.S. and/or State are identified within areas proposed for disturbance, the project applicant shall implement Mitigation Measures 4.4-11(a) through 4.4-11(d), as applicable.*

4.4-12 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. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Wildlife corridors link areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated "islands" of wildlife habitat. Fragmentation also occurs when a portion of one or more habitats is converted into another habitat, such as when woodland or scrub habitat is altered or converted into



grasslands after a disturbance, such as fire, mudslide, or grading activities. Wildlife corridors mitigate the effects of fragmentation by (1) allowing animals to move between remaining habitats, thereby permitting depleted populations to be replenished and promoting genetic exchange; (2) providing escape routes from fire, predators, and human disturbances, thereby reducing the risk of catastrophic events (such as fire or disease) on population or local species extinction; and (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs.

The footprints of the proposed industrial park and nonparticipating parcels are contiguous and feature similar habitats. As such, the potential for impacts related to migratory wildlife corridors and wildlife nursery sites that could occur from developing either project component would be similar. Thus, the following discussion includes both a project-level and program-level analysis of potential impacts that could occur as a result of developing the proposed industrial park and nonparticipating parcels. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Industrial Park and Nonparticipating Parcels

Pursuant to the BRA, the overall project site largely does not function as a wildlife corridor to terrestrial wildlife, as the site is bounded by physical barriers (i.e., roads, urban development, agricultural fields). For example, due to the project site's location along I-5, north-to-south migration through the site by wildlife is limited. Similarly, the existing single-family residential communities immediately to the east of the site limits east-to-west through travel. However, as discussed under Impact 4.4-3, the canals within project site (see Figure 4.4-3 and the discussions under the Aquatic Resources heading above) could support transient giant garter snake on a temporary basis. As such, in the event the species is present in the upland areas adjacent to the on-site canals, construction activities associated with the proposed industrial park and future development of the nonparticipating parcels could interfere substantially with the movement of giant garter snake through the site. However, through compliance with Mitigation Measure 4.4-3, the proposed project would be required to implement the provisions of the applicable Take Avoidance, Minimization, and Mitigation Measure set forth by the Natomas Basin HCP, which includes, but is not limited to, completion of preconstruction surveys for giant garter snake, additional site inspections for sites that contain the species, USFWS environmental awareness training, USFWS notification if a live giant garter snake is found, and prohibition of erosion control matting that could entangle snakes.

Based on the above, the proposed project would not impede the use of native wildlife nursery sites. However, the project could interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. Therefore, a **significant** impact could occur.



Mitigation Measure(s)

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

4.4-12 *Implement Mitigation Measure 4.4-3.*

4.4-13 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The following discussion includes both a project-level and program-level analysis of potential impacts that could occur to protected trees. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not conflict with a local policy or ordinance protecting biological resources.

Industrial Park

As shown in Figure 4.4-4, the industrial park footprint portion of the project site contains 11 trees. In addition, a cluster of seven trees occurs along the southern boundary of Parcel 5, which is contiguous with Parcel 8, a nonparticipating parcel. As none of the trees are located in a City park, on real property the City owns in fee, or within a public ROW, none of the trees would qualify as a protected City Tree. However, the on-site trees could potentially qualify as a Private Protected Tree, which the City defines as a tree on private property that is designated by City Council resolution to have special historical value, special environmental value, or significant community benefit, as well a tree that has a DSH of 24 inches or more and is located on private property that is undeveloped or does not include any single unit or duplex dwellings. Further analysis would be required to confirm if the on-site trees meet the definition of a Private Protected Tree, as established by Sacramento City Code Section 12.56.020.

The City requires a Tree Permit to perform any activity, not including routine maintenance, that could adversely impact the health of a City Tree or Private Protected Tree. To address the potential impact, the proposed project would be required to obtain a Tree Permit in accordance with the requirements set forth in Sacramento City Code Chapter 12.56, pay all applicable fees, and comply with the provisions set forth therein by said permit.

Based on the above, without compliance with requirements set forth by Sacramento City Code Chapter 12.56, development of the proposed industrial park could conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance, and a significant impact could occur.

Nonparticipating Parcels

Various trees occur in and along the boundaries of the nonparticipating parcels that could be developed in the future with industrial uses. As such, prior to the development



of the nonparticipating parcels, a tree survey would be required to be conducted in order to confirm the presence of trees that meet the definitions of a City Tree or Private Protected Tree, as established by Sacramento City Code Section 12.56.020. Any such trees within areas proposed for disturbance as part of development of the nonparticipating parcels would require a Tree Permit from the City of Sacramento Community Development Department to address potential impacts to such trees. Future development projects would also be required to pay all applicable fees and comply with the provisions set forth therein by said permit, in accordance with Sacramento City Code Chapter 12.56.

Based on the above, without compliance with requirements set forth by Sacramento City Code Chapter 12.56, future development of nonparticipating parcels could conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance, and a significant impact could occur.

Conclusion

Based on the above, without compliance with requirements set forth by Sacramento City Code Chapter 12.56, development of the proposed industrial park and future development of nonparticipating parcels could conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance, and a **significant** impact could occur.

Mitigation Measure(s)

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

Industrial Park

4.4-13(a) *Prior to the issuance of any grading permit and commencement of ground-disturbing activities, the project applicant shall hire a qualified arborist to evaluate all trees within areas proposed for disturbance to confirm if the trees meet the definition of a Private Protected Tree, as set forth by Sacramento City Code Section 12.56.020. Results of the tree survey shall be submitted for review and approval to the City of Sacramento Department of Public Works' Urban Forestry section. Should any on-site tree that would be potentially impacted by the proposed project be found to qualify as a Private Protected Tree, the project applicant shall obtain a Tree Permit from the City of Sacramento Community Development Department and comply with the permit requirements in effect at the time of project grading for removal, pruning, or soil disturbance within the canopy dripline of a Private Protected Tree.*

Nonparticipating Parcels

4.4-13(b) *As part of any application associated with development of the nonparticipating parcels, the applicant shall hire a qualified arborist to conduct a tree survey of areas proposed for disturbance to identify any trees that meet the definition of a Private Protected Tree, as established by Sacramento City Code Section 12.56.020. A report detailing the results of the survey shall be submitted for review and approval to the*



City of Sacramento Community Development Department. If protected trees are not identified, further mitigation shall not be required.

4.4-13(c) *If protected trees are identified in areas proposed for disturbance of nonparticipating parcels, the applicant shall implement Mitigation Measure 4.4-13(a).*

4.4-14 Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. Based on the analysis below, the impact is *less than significant*.

A portion of the project site is within the Natomas Basin HCP permit area, which includes portions of both the proposed industrial park and the nonparticipating parcels. However, all development facilitated by the proposed project would be subject to the applicable Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP to address direct impacts to Covered Species that could occur as a result of project construction activities. Therefore, the following discussion includes both a project-level and program-level analysis of potential impacts that could occur from development of the proposed industrial park and nonparticipating parcels. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main alignment would not conflict with the provisions of the Natomas Basin HCP.

Industrial Park and Nonparticipating Parcels

Under the Natomas Basin HCP, mitigation fees for land acquisition, enhancement, and management and monitoring activities are assessed on new development within the HCP permit area. Fees are paid on the basis of a one-time, up-front fee levied upon an authorized development site that is subject to mitigation based upon a 0.5:1 mitigation ratio.

The mitigation fee consists of the following five components: Land Acquisition Fee Component, Restoration and Enhancement Fee Component, Administration and Operations and Maintenance (O&M) Fee Component, O&M Endowment Fund Fee Component, and Supplemental Endowment Fund Fee Component. In addition to the mitigation fee, land dedication is required for any project of more than 50 acres; however, land dedicated is in lieu of paying the Land Acquisition Fee Component of the mitigation fee. For projects 50 acres or less, the full mitigation fee is required to be paid; however, land dedication is not required.

As previously discussed, development of the proposed industrial park and nonparticipating parcels, regardless of a parcel's location within or outside of the Natomas Basin HCP permit area, would be subject to the applicable Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP to address direct impacts to Covered Species. With respect to payment of the Natomas Basin HCP mitigation fees, only site development occurring within the Natomas Basin HCP permit area would be required to pay the fees. However, to ensure the proposed project addresses potential impacts to Swainson's hawk foraging habitat in on-site areas outside of the Natomas Basin HCP permit area, Mitigation Measure 4.4-5(b)



requires the project applicant to pay the mitigation fees, should a portion of the City's surplus HCP coverage acreage be made available to the project.

Because the Natomas Basin HCP's Operating Conservation Plan (OCP) is based upon the City limiting total development to 8,050 acres within the City's portion of the HCP permit area, approval by the City of future urban development beyond the 8,050 acres would trigger a re-evaluation of the Natomas Basin HCP, a new effects analysis, potential amendments, and/or revisions to the Natomas Basin HCP and incidental take permits, a separate conservation strategy, and the need for the City to obtain a new incidental take coverage for that additional development.

As noted above, the City's annual reports have shown surplus acreage available within the 8,050 acres of development allowed under the City's incidental take permit. Due to this surplus acreage, the City could approve the project without exceeding the 8,050-acre development acreage limit. Nonetheless, this EIR includes the following analysis of effects on the Natomas Basin HCP that could result from implementation of the proposed project.

Potential Effects to Natomas Basin HCP Conservation Strategy Key Components

The project site was evaluated to identify the potential effects of the proposed development on key components of the Natomas Basin HCP (taken from Chapter IV, Section C.1 of the Natomas Basin HCP), which were developed to mitigate for 17,500 acres of urban development projected in 2003. The Natomas Basin HCP key components are as follows:

- a. Basis for 0.5:1 mitigation ratio (Section IV.C.1.a);
- b. Preparation of site-specific management plans (SSMPs) (Section IV.C.1.b);
- c. Buffers within the reserve lands (Section IV.C.1.c);
- d. Connectivity (Section IV.C.1.d);
- e. Foraging habitat (Section IV.C.1.e); and
- f. 2,500-acre/400-acre minimum habitat block size requirements (Section IV.C.1.f).

The goal of the Natomas Basin HCP is the conservation of Covered Species through the acquisition (conservation easement or fee title), protection, and enhancement of existing habitats in the Natomas Basin, minimizing impacts of Covered Activities, including development activities, water facility maintenance, and reserve management activities, and focusing upon the preservation of the overall habitat values in the Natomas Basin. The Natomas Basin HCP was developed to allow some urban development to occur, while ensuring that habitat values are maintained and increased, to the maximum extent practicable, within the Natomas Basin. The Natomas Basin HCP sets forth guidelines and practices including the size and acreage of reserves to be established, acquisition criteria for upland and wetland areas to be acquired and managed by the Natomas Basin Conservancy, and reserve management practices to be employed to ensure successful habitat enhancement to support the Covered Species.



The project site supports suitable habitat for several Natomas Basin HCP Covered Species; however, the project site is adjacent to and largely surrounded by existing urbanized areas including residential neighborhoods, I-5, Metro Air Park, and the Sacramento International Airport master plan area.

The potential effects related to the development of the proposed project on key Natomas Basin HCP components are discussed in the following sections.

Mitigation Ratio

The Natomas Basin HCP proposed a minimum 0.5:1 mitigation ratio to be applied to authorized development covered under the Natomas Basin HCP. In describing the basis for the 0.5:1 mitigation ratio, the Natomas Basin HCP states that the 0.5:1 ratio mitigates the impacts of the incidental take authorized under the Natomas Basin HCP, because much of the land to be developed does not provide habitat or provides only marginal habitat and the Natomas Basin Conservancy-managed reserves will provide habitat of higher quality than the eliminated habitat. The proposed project would not alter the habitat value of land authorized for development under the Natomas Basin HCP, and as further discussed below, would not adversely affect the habitat value of existing Natomas Basin Conservancy reserves established under the Natomas Basin HCP. Therefore, the proposed project would not affect the efficacy of the 0.5:1 mitigation ratio identified by the Natomas Basin HCP.

The proposed project would not alter the habitat value of land authorized for development under the Natomas Basin HCP and would not adversely affect the habitat value of the Natomas Basin Conservancy reserves established under the Natomas Basin HCP. Therefore, the proposed project would not affect the effectiveness of the 0.5:1 mitigation ratio for the 17,500 acres of urban development authorized by the Natomas Basin HCP.

Site-Specific Management Plan

Development of the proposed project is not anticipated to adversely affect any Site-Specific Management Plans (SSMPs) for existing or future Natomas Basin Conservancy reserves in the vicinity of any of the properties associated with the project. The Natomas Basin Conservancy prepares and implements an SSMP for each reserve that addresses the specific resources and habitat values of each reserve site, and how they will be managed in support of the goals and objectives of the Natomas Basin HCP. SSMPs for each existing Natomas Basin Conservancy reserve are currently designed to maximize benefits to Covered Species using the resources within that individual reserve or reserve block and incorporate adaptive management strategies. Thus, changes in land use outside of an existing reserve are unlikely to necessitate changes to an SSMP. Although the proposed project would reduce available Swainson's hawk foraging habitat within the project site, which is in the vicinity of two existing Natomas Basin Conservancy reserves, the external factor would not alter the site-specific management of either nearby reserve. The two reserves include the 106-acre "Rosa East" property, which is part of the Natomas Basin HCP reserve system managed by the Natomas Basin Conservancy, and the approximately 100-acre "Rosa Central" reserve, which is also part of the reserve system. Both lie south of the project site on the opposite side of the West Drainage Canal (see Appendix A, Figure 7, Natomas Basin Conservancy Mitigation Lands).



Changes in land use outside of an existing Natomas Basin Conservancy reserve because of the development of the proposed project are unlikely to necessitate changes to existing SSMPs.

Buffers within Reserve Lands

Pursuant to the Natomas Basin HCP, internal buffers ranging from 30- to 70-foot-wide strips of native or ruderal vegetation within the edge of the reserve are often incorporated into the Natomas Basin Conservancy reserves to minimize the effects of incompatible adjoining land uses (see Natomas Basin HCP, Section IV.C.1.c). The Natomas Basin HCP provides that such buffers are to be “considered during the preparation of a site-specific management plan for each reserve site,” and anticipates that such buffers would be used for reserve lands that include improved wetland habitat.

The Natomas Basin Conservancy reserve lands closest to the project site do not currently include improved wetland habitats. In any case, the Natomas Basin HCP provides flexibility for adjusting buffer width within reserve areas depending on conditions. The proposed project would not affect the Natomas Basin Conservancy’s ability to buffer future wetland uses from the project site within the existing reserve lands pursuant to the Natomas Basin HCP.

In addition, areas proposed for disturbance closest to the existing Natomas Basin Conservancy reserve properties are planned to be located more than 300 feet from the West Drainage Canal that separates the project site from the reserves. Thus, planned urban development within the project site would not alter the effectiveness of buffers within the reserve lands. As a result, implementation of the proposed project would not affect buffers within existing Natomas Basin Conservancy reserves.

Habitat Connectivity

The proposed project is not expected to significantly affect the connectivity of reserve habitat, relative to avian species covered under the Natomas Basin HCP due to their highly mobile and migratory nature. Most of the avian species that frequent the Natomas Basin and the Natomas Basin Conservancy reserves are migratory in nature, and effects on habitat connectivity of reserves for avian species are not anticipated due to the development of the project site.

The Natomas Basin HCP emphasizes maintaining connectivity of aquatic habitat between Natomas Basin Conservancy reserves to facilitate giant garter snake movement within the Natomas Basin. The species is focal for two reasons: (1) giant garter snake is the most prevalent Covered Species within the Natomas Basin that requires land/water connectivity to travel within the basin, and (2) if adequate connectivity is provided for giant garter snake, then other Covered Species are anticipated to also be afforded adequate opportunities to migrate within the Natomas Basin.

Aquatic habitat in the Natomas Basin consists primarily of drainage and flood control channels. RD 1000, a public agency, operates the primary drainage canals within the Natomas Basin and is responsible for conveying and pumping non-urban stormwater runoff from the Natomas Basin. Runoff from agricultural lands within the Natomas



Basin flows into numerous local drainage ditches that ultimately flow into the primary RD 1000 canals. RD 1000's primary system of interior drains includes the following:

- The East Drainage Canal conveys drainage water from the northern and eastern Natomas Basin to its confluence with the Main Drainage Canal northwest of the I-80/I-5 interchange;
- The West Drainage Canal conveys drainage water from the western Natomas Basin northwest of Sacramento International Airport to its confluence with the Main Drainage Canal. Fisherman's Lake, a natural slough, is a portion of the West Drainage Canal. The West Drainage Canal runs along the southern boundary of the project site at its closest point;
- The Main Drainage Canal conveys the combined flows of the East and West Drainage Canals from their confluence northwest of the I-80/I-5 interchange through portions of Willow Creek and Metro Center south of I-80; and
- The Cross Canal conveys drainage water from central portions of Sutter County westward to the Sacramento River.

In addition, Natomas Central Mutual Water Company (NCMWC), a private water company, provides irrigation water through water diversions at five locations along the Sacramento River and the Natomas Cross Canal and distributes the water throughout the Natomas Basin through a series of canals and pump stations. The drainage and irrigation canals form a network throughout the Natomas Basin and provide a series of interconnected corridors for aquatic species to disperse and forage.

With respect to the Lone Tree Canal (Canal-2), the canal is an indirect tributary to the Sacramento River by way of the West Drainage Canal. In the Natomas Basin, Lone Tree Canal collects drainage flows and runoff from adjacent properties, including Metro Air Park and the Northlake subdivision site (Greenbriar), and flows southward, where flows are conveyed under I-5 through a multi-cell concrete box culvert, through the project site to the West Drainage Canal. As shown in Figure 3-3 in the Project Description chapter of this EIR, the project would include a new bridge crossing over the Lone Tree Canal as part of construction of the new Airport South Industrial Drive. The bridge would include installation of a new culvert to the canal. Thus, the proposed project could temporarily impede giant garter snakes' ability to migrate through the site by way of the Lone Tree Canal. However, as discussed under Impacts 4.4-3 and 4.4-12, through compliance with the Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP related to giant garter snake, potential impacts to the species, including those associated with the species' use of the on-site canals as migratory corridors, would be reduced to a less-than-significant level. As a result, implementation of the proposed project would not affect habitat connectivity within the Lone Tree Canal.

Swainson's Hawk Foraging Habitat

Based on the analysis in this chapter, the proposed project would reduce the overall upland land cover in the Natomas Basin that is capable of providing foraging habitat for Swainson's hawk by approximately 436.5 acres (which does not include the 37.9 acre Caltrans I-5 fee title ROW portion of the project site that does not provide Swainson's hawk foraging habitat). The majority of the project's development area is currently zoned for agriculture. However, the success of the Natomas Basin HCP does



not require a certain amount of agricultural land remaining in the basin. In addition, the project site is not within the Swainson's Hawk Zone established by the Natomas Basin HCP.

The success of the Natomas Basin HCP does not require a certain amount of agricultural land remaining in the basin. For example, portions of the project site, along with other "uncommitted" agricultural acreage, were acknowledged by the Natomas Basin HCP to provide foraging habitat for Swainson's hawk, but such "existing baseline foraging habitat is not considered mitigation under the [Natomas Basin HCP]" (see Natomas Basin HCP, Section IV-13). Similarly, CDFW found that the impacts of development authorized by the Natomas Basin HCP were fully mitigated by the implementation of the Natomas Basin HCP avoidance and minimization measures, as well as the "establishment, enhancement, and active management of as much as 8,750 acres of high-quality reserve habitat in perpetuity designed and managed specifically for the benefit of the Covered Species" (see Natomas Basin HCP California Endangered Species Act Findings). CDFW's analysis did not mention, nor rely on, any additional "uncommitted" acreage remaining in agriculture.

Swainson's hawk is a focal species that shares habitat requirements with numerous Natomas Basin HCP Covered Species in addition to other special-status species not covered by the Natomas Basin HCP. The effects of the proposed project on foraging habitat would not alter the viability of any of the populations of Natomas Basin HCP Covered Species.

Minimum Block Size

The Natomas Basin HCP stipulates that, by the end of its 50-year lifespan, the Natomas Basin Conservancy reserve system will have reached 8,750 acres with one habitat block at least 2,500 acres in size and the balance of reserve lands in habitat blocks of at least 400 acres in size. The Natomas Basin HCP provides the following basis for the size requirements:

1. Large blocks minimize the "perimeter effect";
2. Large blocks promote biodiversity by allowing multiple species and niches to occupy the site;
3. The benefit to the genetic diversity of dispersing interconnected reserves throughout the Natomas Basin; and
4. The 400-acre reserve size is considered the minimum size to allow the persistence of Covered Species.

Implementation of the proposed project would not prevent the Natomas Basin Conservancy from establishing 8,750 acres of reserves in the Natomas Basin, as identified in the Natomas Basin HCP, as the project site constitutes only 0.89 percent of the acreage in the Natomas Basin and the Natomas Basin Conservancy is well on its way to securing all the reserve lands required to meet its obligations.

The Natomas Basin HCP is now about 20 years into its 50-year timeframe and has already successfully completed its largest land acquisition milestone by completing the 2,500-acre block requirement (see Table 4.4-3). The requisite 2,500-acre block is made up of the following preserves, as shown on the Natomas Basin HCP 2023 Base



Map. Figure 4.4-5 provides a visual representation of the preserves in relation to project site.

| Table 4.4-3 Natomas Basin HCP 2,500-Acre Block | | |
|---|-------------------------|--------------|
| Tract | Acquisition Date | Acres |
| 4. Bennett North | 5-17-99 | 227 |
| 5. Bennett South | 5-17-99 | 132 |
| 7. Lucich South | 5-18-99 | 352 |
| 14. Atkinson | 6-12-03 | 181 |
| 15. Ruby Ranch | 6-23-03 | 91 |
| 16. Huffman West | 9-30-03 | 158 |
| 17. Huffman East | 9-30-03 | 136 |
| 21. Bolen North | 4-29-05 | 114 |
| 22. Bolen South | 4-29-05 | 102 |
| 23. Vestal | 9-12-05 | 95 |
| 24. Bolen West | 9-1-06 | 155 |
| 25. Nestor | 9-1-06 | 233 |
| 31. Lauppe South | 6-30-20 | 172 |
| 32. Verona (CE) | 7-2-20 | 116 |
| 34. Willey | 10-19-20 | 108 |
| 36. Lauppe North | 1-5-22 | 185 |
| Total | | 2,557 |

Source: The Natomas Basin Conservancy, 2023 Base Map, 2023.

With regard to habitat blocks of at least 400 acres, as shown on Figure 4.4-5, the nearest Natomas Basin HCP habitat blocks to the project site include the Rosa East, Rosa Central, Souza, and Natomas Farms reserves totaling approximately 301 acres, and the Cummings and Rudin reserves, totaling approximately 109 acres.

The project site does not include the property lying between the aforementioned two nearby clusters of reserve land and would not preclude the future acquisition of connectivity between the two areas by the Natomas Basin Conservancy.

Conclusion

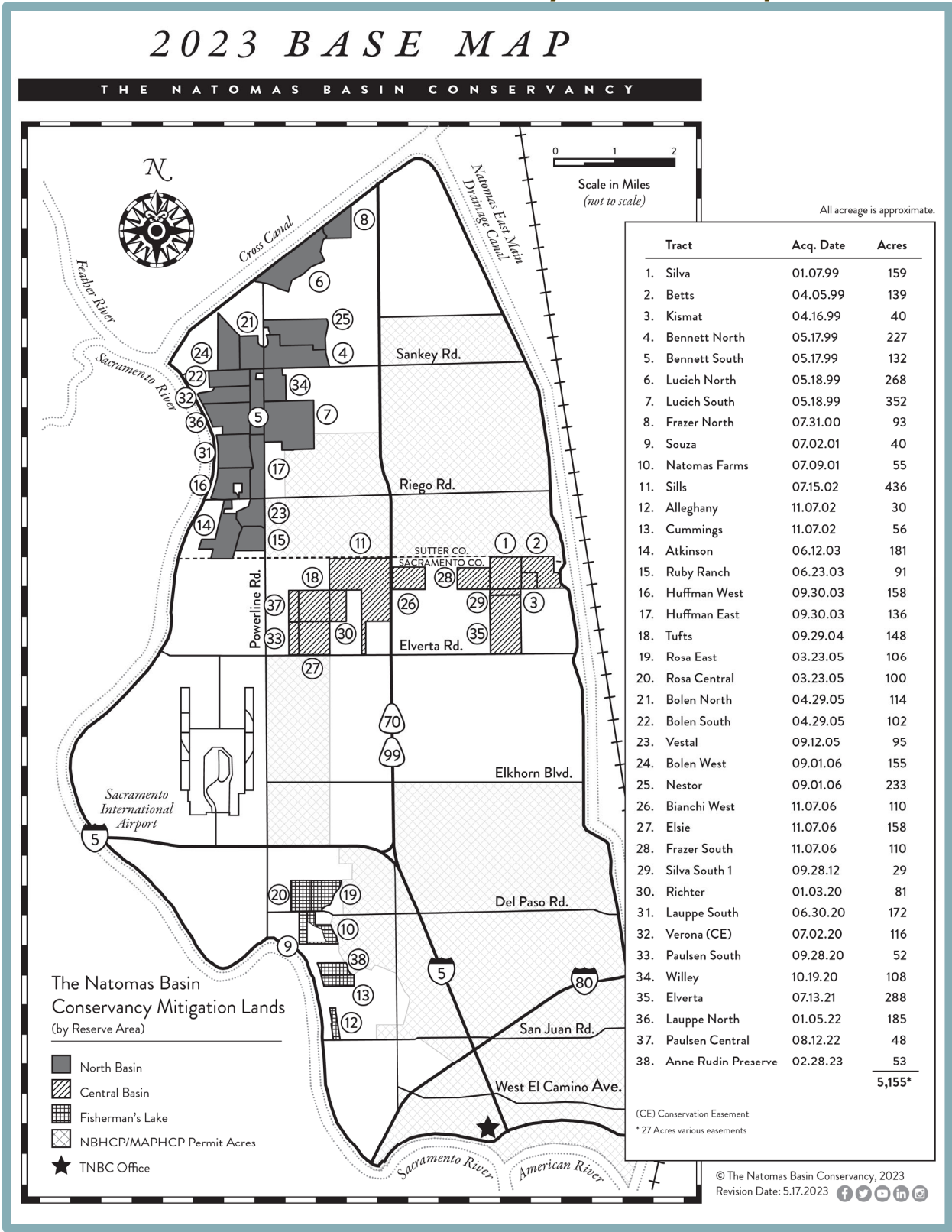
Thus, when looking at all of the above factors, the proposed project would not reduce the effectiveness of the Natomas Basin HCP’s OCP. In addition, with respect to compliance with the Natomas Basin HCP, although only a portion of the project site is within the Natomas Basin HCP permit area, this chapter requires all project construction activities to comply with the applicable Take Avoidance, Minimization, and Mitigation Measures set forth by the Natomas Basin HCP to mitigate potential impacts to a less-than-significant level. Thus, compliance with the aforementioned measures would provide benefits to the Natomas Basin HCP’s Covered Species, as discussed above. Based on the above, the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.



**Figure 4.4-5
 Natomas Basin Conservancy 2023 Base Map**



Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

The geographic scope for the cumulative biological resources analysis generally includes buildout of the City of Sacramento General Plan policy area, including the Northlake (Greenbriar) subdivision to the north of the project site, as well as the sites of the Metro Air Park, the Upper Westside Specific Plan (formerly referred to as “The Boot” precinct area of the Natomas Joint Vision Plan), the Grandpark Specific Plan (formerly North Precinct per the Natomas Joint Vision Plan), the Sacramento International Airport Master Plan, and the Elkhorn Boulevard Extension Project. For further details related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections, of this EIR.

4.4-15 Cumulative loss of habitat for special-status species. Based on the analysis below and with implementation of mitigation, the project’s incremental contribution to the significant cumulative impact is *less than cumulatively considerable*.

Pursuant to the City of Sacramento MEIR, the City’s General Plan policy area encompasses a 102-square-mile area. As detailed in the MEIR, although the majority of the policy area is developed with residential, commercial, and other urban uses, valuable natural habitat still exists. Such habitats are located primarily outside the City boundaries in the northern, southern and eastern portions of the policy area, but also occur within the policy area along river and stream corridors and on a number of undeveloped parcels. Habitats present include annual grasslands, riparian woodlands, oak woodlands, riverine, ponds, freshwater marshes, seasonal wetlands, and vernal pools.

The MEIR evaluated the potential for development facilitated by buildout of the General Plan policy area to contribute to regional loss of special-status plant or wildlife species or their habitat under Impact 4.3-11 (of the MEIR) and concluded that even with implementation of applicable General Plan policies, a significant and unavoidable impact would occur. As detailed therein, as development in the City of Sacramento and in the greater Sacramento Valley continues, habitat for sensitive plant and wildlife species native to the region, including those species listed under FESA and CESA and those individuals identified by State and federal resources agencies as Species of Concern or Fully Protected, would be lost through conversion of existing open space to urban development. Additionally, future development of the Northlake subdivision, the Metro Air Park, the Upper Westside Specific Plan, the Grandpark Specific Plan, the Sacramento International Airport Master Plan, and the Elkhorn Boulevard Extension Project, all located within the Natomas Basin, would further reduce the availability of habitat to accommodate protected plant and wildlife species, relative to existing levels. In addition, potential jurisdictional wetlands, riparian habitat, and designated Sensitive Natural Communities occur throughout the policy area and



potentially occur in the aforementioned development sites, which could further result in the loss of regional biological resources as future development occurs.

However, with respect to cumulative development within the more immediate project vicinity, the Natomas Basin HCP is specifically designed to address potential impacts to biological resources on a cumulative scale within the basin. The Natomas Basin HCP is a multi-species conservation program adopted for the purposes of minimizing and mitigating the loss of habitat values and incidental take of Covered Species resulting from urban development, operation and maintenance of irrigation and drainage systems, and various activities associated with the Natomas Basin Conservancy's management of reserves established under the Natomas Basin HCP. Through compliance with applicable Take Avoidance, Minimization, and Mitigation Measures, potential impacts to biological resources covered under the Natomas Basin HCP within the permit area are reduced to a less-than-significant level. In addition, as discussed under Impact 4.4-14, the Natomas Basin HCP is now about 20 years into its 50-year timeframe and has already successfully completed its largest land acquisition milestone by completing the 2,500-acre block requirement (see Table 4.4-3). Thus, by the end of the Natomas Basin HCP's lifespan, the Natomas Basin Conservancy reserve system is anticipated to reach 8,750 acres, with one habitat block at least 2,500 acres in size and the remaining balance of reserve lands in habitat blocks of at least 400 acres in size.

With respect to the proposed project, the project site is not currently within the City limits. Through approval of the proposed Sphere of Influence (SOI) Amendment and Annexation, the project site would be annexed into the City of Sacramento. As such, the MEIR's evaluation of potential impacts to biological resources did not include consideration of the project site. As discussed above, the site contains perennial rye grass field, upland mustards or star-thistle fields, developed/disturbed land covers, open water, unknown row crops, poison hemlock or fennel patches, Himalayan blackberry – rattlebox – edible fig riparian scrub, Goodding's willow – red willow riparian woodland and forest, valley oak riparian forest woodland, hardstem and California bulrush marsh, and cattail marsh. In addition, a total of 2,018 acres of potential jurisdictional tributary drainages and other waters of the U.S. were identified within the project site. Development of the proposed industrial park and future development of the nonparticipating parcels could result in potential impacts to portions of the foregoing areas. As discussed throughout this chapter, the above areas represent potential habitat for various special-status species listed in Table 4.4-2.

However, this chapter provides a wide range of mitigation to minimize all potential adverse effects to habitat for special-status species that could occur as part of the proposed project. With respect to potential impacts that could occur to special-status plant and wildlife species, mitigation measures would require implementation of applicable Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures for Covered Species to address potential impacts that could occur as a result of all project-associated construction activities, regardless of whether they occur within or outside of the Natomas Basin HCP permit area. Compliance with the aforementioned Take Avoidance, Minimization, and Mitigation Measures would reduce potential impacts to protected plant species, giant garter snake, northwestern pond turtle, Swainson's hawk, burrowing owl, and loggerhead shrike to a less-than-significant level.



For species not covered under the Natomas Basin HCP, such as northern harrier, white-tailed kite, song sparrow, and other nesting birds and raptors protected under the MBTA and CFGC, mitigation measures are also included to address potential impacts. Such measures necessitate preconstruction surveys to identify active nests and further provisions should active nests be on-site or in areas immediately adjacent to the site. In addition, in the event that a portion of the City's surplus HCP coverage acreage is not available to the project to address potential impacts to on-site foraging habitat outside of the Natomas Basin HCP permit area, Mitigation Measure 4.4-5(b) requires the project to preserve Swainson's hawk foraging habitat elsewhere, in accordance with applicable CDFW guidelines. Furthermore, potential impacts to riparian habitat or other Sensitive Natural Communities are addressed through mitigation requiring compliance with Section 1600 of the CFGC. Finally, potential impacts to protected wetlands are addressed through mitigation requiring compliance with Sections 404 and 401 of the CWA. Overall, with incorporation of the mitigation measures set forth herein, potential impacts to biological resources that could occur as a result of the proposed project would all be reduced to a less-than-significant level. As such, the proposed project would not result in substantial adverse effects to biological resources protected under CEQA.

With respect to potential impacts that could occur to biological resources as part of development of buildout of the General Plan policy area including the Northlake subdivision or areas within the unincorporated Sacramento County portions of the Natomas Basin, such as the Metro Air Park (which is subject to its own Metro Air Park HCP), the Upper Westside Specific Plan, the Grandpark Specific Plan, the Sacramento International Airport Master Plan, and the Elkhorn Boulevard Extension Project, such areas in the cumulative setting would be subject to applicable policies, regulations, and standards set forth at the federal, State, and local level, including preconstruction surveys, compliance with CFGC Section 1600, and Sections 404 and 401 of the CWA. Therefore, all potential impacts that could occur through development in the cumulative setting would be reduced through applicable regulatory requirements.

Information regarding several past, present, and future projects in the Natomas Basin is provided below, although the level of detail available varies by project.

Northlake Subdivision

The Northlake subdivision is located in the City of Sacramento, in the central portion of the Natomas Basin at the intersections of I-5 and SR 99. The Northlake subdivision received first-tier entitlements for development in 2008 and a Tentative Map for the first phase of development in 2017. The 577-acre site includes residential, commercial, and public land uses, and is partially built out. The project included on-site and off-site habitat reserves at greater than a 1:1 ratio.

The Northlake subdivision is not within the City's permit area under the Natomas Basin HCP, and its on- and off-site reserves were in addition to the reserve system originally contemplated for the NBHCP. Thus, a project-level effects analysis was prepared to evaluate the Northlake subdivision's potential effects on the Natomas Basin HCP Covered Species and their habitats.



Metro Air Park

The Metro Air Park consists of the development of approximately 1,892 acres with a combination of commercial, industrial, manufacturing, and airport-related land uses in unincorporated Sacramento County. The Metro Air Park is located generally east of the Sacramento International Airport, north of I-5, and west/northwest of the Northlake subdivision. Development within the Metro Air Park is ongoing, and is subject to the Metro Air Park HCP, which was developed consistent with the Natomas Basin HCP. Reserve lands obtained pursuant to the Metro Air Park HCP are managed by the Natomas Basin Conservancy along with those reserve lands acquired under the Natomas Basin HCP.

Upper Westside Specific Plan

Another project in the region, the Upper Westside Specific Plan, encompasses approximately 2,066 acres in the unincorporated Natomas community of Sacramento County, approximately 3.5 miles from downtown Sacramento. The Upper Westside Specific Plan area is bounded by I-80 to the south, the West Drainage Canal to the east, Fisherman's Lake Slough to the north, and Garden Highway to the west. The Upper Westside Specific Plan is located outside of the County's Urban Policy Area and Urban Services Boundary, but is bounded on three sides by the City of Sacramento, bordering the communities of North and South Natomas. Similar to the Grandpark Specific Plan, publicly available information regarding the potential biological impacts of the Upper Westside Specific Plan is not available. The Notice of Preparation (NOP) states that the EIR will analyze impacts to special-status species and habitats, as well as analyze potential conflicts with adopted HCPs.

Grandpark Specific Plan

The Grandpark Specific Plan is an approximately 5,675.6-acre mixed-use project located in the Natomas community of unincorporated northwestern Sacramento County, south of Sutter County and southwest of Placer County, east of SR 99, and north of Elkhorn Boulevard and the City of Sacramento. The Grandpark Specific Plan includes a broad range of residential land uses, as well as commercial and employment land uses, schools, parks, and open space to support the residential land uses. The Grandpark Specific Plan's potential impacts on biological resources are not yet publicly available, although the NOP indicated the project's EIR would be used as part of pursuing a Section 10 consultation with the USFWS, as well as an incidental take permit from CDFW. While analysis of potential impacts is not available, Sacramento County, USFWS and CDFW are reasonably assumed to ensure that the project minimizes and fully mitigates its impacts to special-status species and habitats, as well as impacts related to conflicts with the Natomas Basin HCP.

Sacramento International Airport Master Plan

The Sacramento International Airport Master Plan, most recently updated in 2022, includes the major improvements that are needed at the Sacramento International Airport over a 20-year planning horizon. The improvements are safety-, security-, and capacity-enhancement projects that enable the Sacramento County Airport System to meet customer service goals at increased levels of activity in passengers, air cargo, and aircraft operations.



The Sacramento International Airport Master Plan defines planned projects within Sacramento County-owned lands over approximately a 20-year horizon, including terminal expansions, transportation improvements, and related projects. Environmental impacts associated with the projects were evaluated and addressed most recently in a Supplemental EIR certified by Sacramento County in 2022.

Conclusion

As further discussed in Chapter 6 of this EIR, CEQA Guidelines Section 15064, Subdivision (h)(5) states, “[...]the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.” Therefore, even where cumulative impacts are significant, any level of incremental contribution is not necessarily deemed cumulatively considerable (see also CEQA Guidelines Section 15130). In addition, the courts have explicitly rejected the notion that a finding of significance is required simply because a proposed project would result in a net loss of habitat. “[M]itigation need not account for every square foot of impacted habitat to be adequate. What matters is that the unmitigated impact is no longer significant,” (*Save Panoche Valley v. San Benito County* [2013] 217 Cal.App.4th 503, 528, quoting *Banning Ranch Conservancy v. City of Newport Beach* [2012] 211 Cal.App.4th 1209, 1233).

The above discussion provides substantial evidence that, while the combined effects on the habitats of special-status species resulting from approved/planned development throughout the cumulative setting may be considered significant, the proposed project’s incremental contribution to the potentially significant cumulative effect would be reduced with implementation of the project-specific mitigation measures required in this EIR.

Based on the above, cumulative conditions may result in a significant cumulative impact related to the loss of special-status species habitat in the vicinity of the project. Although habitat impacts covered by the Natomas Basin HCP or Metro Air Park HCP are mitigated under the foregoing HCPs, and habitat impacts associated with buildout of the Northlake subdivision were separately addressed through project-specific mitigation measures, the City does not control mitigation for ongoing and future projects in unincorporated Sacramento County. Therefore, the overall habitat impact would be considered significant. Therefore, the proposed project’s contribution to the significant impact could be ***cumulatively considerable***.

Mitigation Measure(s)

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

Industrial Park

4.4-15(a) *Implement Mitigation Measures 4.4-1(a) and 4.4-1(b), 4.4-3, 4.4-4(a), 4.4-5(a) and 4.4-5(b), 4.4-6, 4.4-8, 4.4-9(a) and 4.4-9(b), 4.4-10(a), 4.4-11(a) through 4.4-11(c), and 4.4-13(a).*



Nonparticipating Parcels

4.4-15(b) Implement Mitigation Measures 4.4-1(a) and 4.4-1(b), 4.4-3, 4.4-4(a), 4.4-5(a) and 4.4-5(b), 4.4-6, 4.4-8, 4.4-9(a) and 4.4-9(b), 4.4-10(b) and 4.4-10(c), 4.4-11(e) and 4.4-11(f), and 4.4-13(b) and 4.4-13(c).



4.5 CULTURAL RESOURCES

4.5 CULTURAL RESOURCES

4.5.1 INTRODUCTION

The Cultural Resources chapter of the EIR addresses known and unknown historic and prehistoric cultural resources in the vicinity of the project area. Cultural resources can be categorized into prehistoric or historic resources. Prehistoric resources are those sites and artifacts of or related to a time period generally prior to contact with people of European descent. Historic resources include structures, features, artifacts, and sites that date from Euroamerican settlement of the region. The chapter summarizes the existing setting with respect to cultural resources, identifies thresholds of significance, evaluates project impacts to such resources, and sets forth mitigation measures. Information presented in the chapter is primarily drawn from the Cultural Resources Study prepared by Tom Origer & Associates,¹ as well as the City of Sacramento 2040 General Plan² and the City of Sacramento 2040 Master EIR (MEIR).³

Tribal cultural resources are addressed in Chapter 4.13, Tribal Cultural Resources, of this EIR. In addition, as discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

4.5.2 EXISTING ENVIRONMENTAL SETTING

The Central Valley of California contains a rich cultural resource heritage that includes archeological and historical sites and resources. Archeological materials, including human burials, have been found throughout the City and Sacramento County. Areas of high sensitivity for archeological resources, as identified in the 2040 General Plan Background Report, are generally located within close proximity to the rivers, creeks and sloughs. In addition, recent discoveries during infill construction in downtown Sacramento have shown that the downtown area is highly sensitive for both historic- and prehistoric-period archaeological resources. Given the rich heritage of the area, many archeological and historical sites and resources may remain undiscovered within the City.

The 474.4-acre project site is undeveloped and consists entirely of agricultural land. The project site lies within the American Basin of the Sacramento Valley. The American Basin is a low-lying

¹ Tom Origer & Associates. *Cultural Resources Study for the Airport South Industrial Park Project*. March 7, 2022.
² City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.
³ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



geological depression in the plains bounded by the Feather River to the north, the Sacramento River to the west, the Sierra foothills to the east, and the American River on the south. The project site is situated on generally level land with a slope of three percent or less. The area surrounding the project site has remained rural until the relatively recent spread of commercial, industrial, and residential development.

The following sections provide further details regarding the prehistoric overview, ethnographic overview, and historic overview of the project area, as well as a description of any identified cultural resources associated with the project site.

Prehistoric Overview

The concept of prehistory refers to the period of time before events were recorded in writing and varies worldwide. Because a written record does not exist, the understanding of California prehistory relies on archaeological materials and oral histories passed down through generations. Early archaeological research in Central California began with the work of Max Uhle and Nels Nelson. Uhle is credited with the first scientific excavation in California with his work at the Emeryville Shellmound in 1902, and Nelson spent several years (1906 to 1908) surveying the San Francisco Bay margins and California coast for archaeological sites. In the 1930s, archaeologists began piecing together a sequence of cultures primarily based on burial patterns and ornamental artifact from sites in the lower Sacramento Valley. The cultural sequence became known as the Central California Taxonomic System (CCTS), which identified three culture periods termed the Early, Middle, and Late Horizons, but without offering date ranges. Refinement of the CCTS became a chief concern of archaeologists as the century progressed.

In 1973, David Fredrickson developed a regional chronology that is still currently used, albeit modified for locality-specific circumstances. Fredrickson's regional chronology shows that native peoples have occupied central California for over 11,000 years. In addition, Fredrickson defined cultural patterns pertinent to the Central Valley, known as the Windmill, Berkeley, and Augustine patterns. After Fredrickson's definition of cultural chronology and patterns, Rosenthal et al. examined the body of archaeological work conducted in the Central Valley and found that most of the substantial sites that would be able to provide chronological data over long periods had been excavated many years prior. Given little new information had been obtained to refine Fredrickson's chronology, Rosenthal et al. were only able to summarize observations made to date. As devised by Rosenthal et al., and with the timeframes adjusted for modern calibration curves for radiocarbon dates, the chronological sequence for the Central Valley is: Paleo-Indian (11500 to 8550 cal [calibrated] B.C.), Lower Archaic (8550 to 5550 cal B.C.), Middle Archaic (5550 to 550 cal B.C.), Upper Archaic (550 cal B.C. to cal A.D. 1100), and Emergent or Late Prehistoric Period (cal A.D. 1100 to Historic Contact).

In 1960, the first study of obsidian hydration as a dating tool for archaeologists was published. The study showed that the chemical composition of the obsidian and temperature affect the hydration process. In the 1980s, research into the obsidian hydration dating method was conducted for the North Bay Area which had four major obsidian sources. In 1987, Thomas Origer devised a hydration chronology for the North Bay Area. Origer was able to develop a hydration rate for Annadel and Napa Valley obsidian sources as a result of his study. Later, comparison constants were developed among the four primary obsidian sources in the North Bay Area. The concept of comparison constants allows for the calculation of dates from hydration band measurements taken from obsidian specimens from sources with unknown hydration rates.



The development of obsidian hydration rates for central California obsidian sources has provided archaeologists the ability to obtain dates from sites that could not previously be dated due to the lack of diagnostic artifacts or organic material suitable for radiocarbon dating, and the previous chronology of the area was refined.

According to the City of Sacramento General Plan Background Report, the first settlements in the Sacramento Valley likely occurred during the late Pleistocene and early Holocene (14,000 to 8,000 B.P.) period. Sacramento's location within a great valley and at the confluence of two rivers, the Sacramento River and the American River, shaped the early and modern settlements of the area. However, the archaeological record of such use is sparse. Paleo- Indian populations likely occupied the area with villages located near watercourses.

Ethnographic Overview

The project site is located in lands historically occupied by the Nisenan (also known as the Southern Maidu). Prior to Euro-American contact, Nisenan territory included the southern extent of the Sacramento Valley, east of the Sacramento River between the North Fork Yuba River and Cosumnes River on the north and south, respectively, and extended east into the foothills of the Sierra Nevada. For a full ethnographic overview of the project area, see Chapter 4.13, Tribal Cultural Resources, of this EIR.

Historic Overview

The project site is within the Sacramento Valley, which constitutes the northern portion of the Central Valley region. The earliest expeditions into the Central Valley were conducted by the Spanish during the late 18th and early 19th centuries. Spanish settlers navigated the waters of the Sacramento River searching for suitable sites to build new missions. Another early expedition through the Sacramento Valley by land was conducted by an American named Jedediah Smith in 1826. The trail he created became known as the Sacramento Trail and it was used for trade and travel.

John Sutter immigrated to the United States in 1834 from Switzerland. Two years later he arrived in California and into the company of Governor Juan Alvarado. Sutter told Alvarado that he was interested in settling on land along the Sacramento River. Likely due to concerns that the Russians and Americans would invade the land, Alvarado promised Sutter Mexican citizenship and land. Alvarado told Sutter to find the land he wanted, return to him within a year, and the land would be his. In September 1839, Sutter founded his fort. Sutter was granted Mexican citizenship and the rancho Nuevo Helvetia which totaled nearly 50,000 acres in size was established. Sutter's Fort was the first major settlement in the lower Sacramento/upper San Joaquin valleys and was at a major crossroads for people traveling into and through California.

Spanish and Mexican settlers did little to alter the Delta's landscape, but when California became a U.S. state, the federal law outlined in the Swamp and Overflowed Land Act of 1850 applied to the vast wetlands of the Delta. "Swamp and overflowed" land was a legal term used to identify land that was too wet to cultivate. The Swamp and Overflowed Land Act gave states the power to sell "swamp and overflowed" land and was designed to encourage the reclamation of the land and subsequent use. Review of historical maps shows that the project site was classified as swamp and overflowed land, and that most of the project site was once part of Fisherman's Lake, which would have been the closest water source during prehistoric times.



Reclamation District (RD) 1000 was formed by the California legislature in 1911, to allow for the reclamation of the American Basin for agricultural purposes. The Natomas Consolidated Company began the reclamation of tens of thousands of acres along the east side of the Sacramento River between the American and Feather Rivers. RD 1000 was constructed as a drainage system consisting of over 30 miles of main canals and 150 miles of ditches used for flood control as well as crop irrigation for nearly 87 square miles of land. Eventually, the reclamation efforts were confronted with continual flooding, which resulted in slower progress and rising costs associated with the project. Due to the lands not selling as hoped, and the federal government gearing up for World War I in 1914, the Natomas Consolidated Company could not keep up with expenses and reorganized in 1928 to form the Natomas Company. By 1955, the Natomas Company finally sold the rest of the reclaimed land, relinquishing the remaining control over the district to the landowners.

Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

Project Site History

A review of 19th and 20th-century maps and aerial photos shows several buildings and structures within the project site, with the earliest evidence being a 1937 aerial. As described below, most of the buildings were previously documented and subsequently demolished. One building complex in the eastern portion of the project site was not documented. However, aerial photos show that the complex was demolished between 1981 and 1993.

Several ditches and a canal were also shown within the project site. The earliest ditches were present by 1937; but most of the ditches are not currently extant or have been modified since original construction. One ditch is present within the eastern portion of the project site that dates to 1937. However, the northern half of the ditch was filled in between 1961 and 1970. A canal is shown bisecting the project site as early as 1937. The canal connected to the West Drainage Canal and continued north outside of the project site to an unnamed ditch along Elkhorn Boulevard. Between 1961 and 1970 the course of the canal was altered within the project site. The southeastern portion of the project site contains a low-lying area that drains into the West Drainage Canal; however, the area appears to have been modified in 1961. The remaining six ditches within the project site appear to be modern.

Known Cultural Resources

Archival research was carried out as part of the Cultural Resources Study prepared for the proposed project by Tom Origer & Associates, including review of available historic documents and a records search. A records search of the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) was conducted for the project site and vicinity at California State University, Sacramento. In addition, Tom Origer & Associates conducted field surveys of the project site on February 9 and 10, 2022, and February 16, 2022.

The records search determined that 11 cultural resources studies have been conducted within 0.25-mile of the project site, five of which included portions of the project site. Three resources were recorded within the project site including P-34-000876, P-34-000877, and P-34-000878. In addition, the project site lies within two districts documented as P-34-005251 and P-34-005225.



The following sections include a description of each of the five previously documented historic resources.

P-34-000876

In 2002, resource P-34-000876 was recorded as a district known as the Lauppe Ranch Complex. The complex was evaluated and considered ineligible for the California and National Registers. The resource location was revisited in 2011 and all that remained were two building foundations.

P-34-000877 and P-34-000878

Resources P-34-000877 and P-34-000878, also recorded in 2002, were documented respectively as a single-story house and a barn constructed in approximately 1946. Both buildings were evaluated and did not exhibit historical or architectural significance. Thus, the structures were considered ineligible for inclusion on the California and National Registers. The building locations were revisited in 2011. Both buildings had been demolished and only a concrete pad remained.

P-34-005251 and P-34-005225

The project site lies within two districts documented as P-34-005251 and P-34-005225. P-34-005251, known as RD 1000, was originally recorded in 1997. RD 1000 was built between 1912-1916 and consisted of a large drainage system comprising 87 square miles of agricultural fields, canals, ditches, and levees. The closest contributing element to the district is the West Drainage Canal (P-34-000457) which is located just south of, and outside, the project site.

District P-34-005225 was recorded in 2018 as a Tribal Cultural Landscape of the Nisenan and the Plains Miwok. The Landscape consists of natural waterways, riparian forests, and wetlands that supported the lifeways of the local Native Americans that inhabited the area.

4.5.3 REGULATORY CONTEXT

Federal, State, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The following section contains a summary of basic federal and State laws governing preservation of historic and archaeological resources of national, regional, State, and local significance.

Federal Regulations

The following are the federal environmental laws and policies relevant to cultural resources.

Section 106 for the National Historical Preservation Act of 1966

Federal regulations for cultural resources are governed primarily by Section 106 of the National Historical Preservation Act (NHPA) of 1966. Section 106 of NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 Code of Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places (NRHP). The criteria for determining NRHP eligibility are found in 36 CFR Part 60. Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must



follow federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if a project requires a federal permit or uses federal funding.

National Register of Historic Places

NRHP is the nation's master inventory of known historic resources. The NRHP includes listings of resources, including: buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, State, or local level. Resources over 50 years of age could be listed on the NRHP. However, properties under 50 years of age that are of exceptional significance or are contributors to a district could also be included on the NRHP. Four criteria are used to determine if a potential resource may be considered significant and eligible for listing on the NRHP. The criteria include resources that:

- A. Are associated with events that have made a significant contribution to the broad patterns of history; or
- B. Are associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded or may likely yield information important in prehistory or history.

A resource can be individually eligible for listing on the NRHP under any of the above four criteria, or can be listed as contributing to a group of resources that are listed on the NRHP.

A resource can be considered significant in American history, architecture, archaeology, engineering, or culture. Once a resource has been identified as significant and potentially eligible for the NRHP, the resource's historic integrity must be evaluated. Integrity is a function of seven factors: location, design, setting, materials, workmanship, feeling, and association. The factors closely relate to the resource's significance and must be intact for NRHP eligibility.

Historical buildings, structures, and objects are usually eligible under Criteria A, B, and C based on historical research and architectural or engineering characteristics. Archaeological sites are usually eligible under Criterion D, the potential to yield information important in prehistory or history. An archaeological test program may be necessary to determine whether the site has the potential to yield important data. The lead federal agency makes the determination of eligibility based on the results of the test program and seeks concurrence from the State Historic Preservation Officer (SHPO).

Effects to NRHP-eligible resources (historic properties) are adverse if the project may alter, directly or indirectly, any of the characteristics of an historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

State Regulations

The following are the State environmental laws and policies relevant to cultural resources.



California Environmental Quality Act and California Register of Historic Places

State historic preservation regulations affecting this project include the statutes and guidelines contained in CEQA (Public Resources Code [PRC] sections 21083.2 and 21084.1 and sections 15064.5 and 15126.4 (b) of the CEQA Guidelines). CEQA requires lead agencies to consider the potential effects of a project on historic resources and unique archaeological resources. A “historic resource” includes, but is not limited to, any object, building, structure, site, area, place, record or manuscript that is historically or archaeologically significant (PRC section 5020.1). Under Section 15064.5 of the CEQA Guidelines, a resource is considered “historically significant” if one or more of the following California Register of Historic Resources (CRHR) criteria have been met:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California history;
2. The resource is associated with the lives of important persons from our past;
3. The resource embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual or possesses high artistic values; or
4. The resource has yielded, or may be likely to yield, important information in prehistory or history.

In addition, the resource must retain integrity. Cultural resources determined eligible for the NRHP by a federal agency are automatically eligible for the CRHR.

CEQA requires preparation of an EIR if a proposed project would cause a “substantial adverse change” in the significance of a historical resource. A “substantial adverse change” would occur if a proposed project would result in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines Section 15064.5[b][1]).

In addition to historically significant resources, which can include archeological resources that meet the criteria listed above, CEQA also requires consideration of “unique archaeological resources.” If a site meets the definition of a unique archaeological resource, the site must be treated in accordance with the provisions of PRC section 21083.2. Under PRC section 20183.2(g), an archaeological resource is considered “unique” if it:

- 1) Is associated with an event or person of recognized significance in California or American history or recognized scientific importance in prehistory;
- 2) Can provide information that is of demonstrable public interest and is useful in addressing scientifically consequential and reasonable research questions;
- 3) Has a special kind or particular quality such as oldest, best example, largest, or last surviving example of its kind;
- 4) Is at least 100 years old and possesses substantial stratigraphic integrity; or
- 5) Involves important research questions that can be answered only with archaeological methods.

CEQA also includes specific guidance regarding the accidental discovery of human remains. Specifically, CEQA Guidelines Section 15064.5(e) requires that if human remains are uncovered, excavation activities must be stopped and that the county coroner be contacted. If the county



coroner determines that the remains are Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC identifies the most likely descendant, and that individual or individuals can make recommendations for treatment of the human remains under the procedures set forth in Section 15064.5 of the CEQA Guidelines.

The SHPO maintains the CRHR. Properties that are listed on the NRHP are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys.

Local Regulations

The following are the local environmental laws and policies relevant to cultural resources.

City of Sacramento 2040 General Plan

Goals and policies from the City's 2040 General Plan related to cultural resources applicable to the proposed project are presented below.

Historic and Cultural Resources

Goal HCR-1 Historic and cultural resources that enrich our sense of place and our understanding of the City's prehistory and history.

- | | |
|----------------|--|
| Policy HCR-1.1 | Preservation of Historic and Cultural Resources, Landscapes, and Site Features. The City will continue to promote the preservation, restoration, enhancement, and recognition of historic and cultural resources throughout the city. |
| Policy HCR-1.2 | Maintenance and Preservation. The City will continue to encourage maintenance and preservation of historic and cultural resources to promote the continued vitality of its neighborhoods. |
| Policy HCR-1.3 | Compatibility with Historic Context. The City will continue to review new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context and consistency with design guidelines/ standards, including the Historic District Plans. The City shall pay special attention to the scale, massing, and relationship of proposed new development to complement surrounding historic environments. |
| Policy HCR-1.4 | Historic Districts. The City will continue to establish and maintain historic districts to provide for the preservation and restoration of those areas that are of historic significance. |
| Policy HCR-1.6 | Early Project Consultation. The City will continue to strive to minimize impacts to historic and cultural resources |



by consulting with property owners, land developers, tribal representatives, and the building industry early in the development review process as needed.

- Policy HCR-1.7 **Contextual Features.** The City shall promote the preservation, rehabilitation, restoration, and/or reconstruction, as appropriate, of contextual features related to historic resources, including maintenance and reconversion of parkway strips to landscaping; maintenance and replication of historic sidewalk patterns; use of historic streetlamps and street signs; and maintenance or restoration of historic park features.
- Policy HCR-1.8 **Ongoing Maintenance.** The City shall support the maintenance and safety of historic properties and resources through a combination of education and incentives, to avoid the need for major and costly rehabilitation, and to reduce risks to historic properties that are suffering from deferred maintenance.
- Policy HCR-1.9 **Disaster Preparedness.** The City shall seek to minimize or avoid adverse impacts to historic and cultural resources from natural disasters. To this end, the City shall promote seismic safety, flood protection, and other building retrofit programs that preserve, enhance, and protect these resources consistent with their historic design character.
- Policy HCR-1.10 **Demolition.** Consistent with Secretary of the Interior Standards, the City shall consider demolition of historic resources as a last resort, to be permitted only if rehabilitation or adaptive reuse of the resource is not feasible; demolition is necessary to protect the health, safety, and welfare of its residents; or the public benefits outweigh the loss of the historic resource.
- Policy HCR-1.12 **Incentives for Rehabilitation and Adaptive Reuse of Historic Resources.** The City shall continue to encourage and support restoration and adaptive reuse through implementation of Mills Act contracts, grant programs, and other preservation incentive programs.
- Policy HCR-1.13 **Indigenous Cultures.** The City shall seek ways to recognize the peoples who first lived in, traveled, and traded in what is now the Sacramento area, by working with tribal representatives to preserve their identity, culture, and artifacts. Methods for recognizing tribal history and imagery may include, but are not limited to, the following:



- Public art that provides a Native American perspective including works by Native artists;
- Naming of parks and places that reflects local Native American heritage and/or restores tribal names;
- Parks and recreation programming that increases awareness of tribal heritage and culture (including through interpretive displays) and allows opportunities for craft sharing;
- Incorporation of traditional native plants into landscape design palettes.

Policy HCR-1.14 **Archaeological, Tribal, and Cultural Resources.** The City shall continue to comply with federal and State regulations and best practices aimed at protecting and mitigating impacts to archaeological resources and the broader range of cultural resources as well as tribal cultural resources.

Policy HCR-1.15 **Treatment of Native American Human Remains.** The City shall treat Native American human remains with sensitivity and dignity and ensure compliance with the associated provisions of California Health and Safety Code and the California Public Resources Code. The City shall collaborate with the most likely descendants identified by the Native American Heritage Commission.

Policy HCR-1.16 **Endemic Traditions.** The City shall seek ways to recognize the endemic traditions of various communities in Sacramento, including African American, Hispanic, Native, and Asian American communities, to promote the retention of Sacramento's intangible cultural heritage, which may include oral traditions, performing arts, social practices and festive events, legacy businesses, knowledge and practices concerning nature and the universe, and traditional craftsmanship.

Policy HCR-1.17 **Evaluation of Archeological Resources.** The City shall work in good faith with interested communities to evaluate proposed development sites for the presence of sub-surface historic, archaeological, and tribal cultural resources that may be present at the site. These efforts may include the following:

- Consideration of existing reports and studies,
- Consultation with Native American tribes as required by State law,
- Appropriate site-specific investigative actions, and



- Onsite monitoring during excavation if appropriate.

Policy HCR-1.18 **Evaluation of Potentially Eligible Built Environment Resources.** The City shall continue to evaluate all buildings and structures 50 years old and older for potential historic significance prior to approving a project that would demolish or significantly alter the resource.

Policy HCR 1.1.3 **Certified Local Government Requirements.** The City shall maintain provisions in the Sacramento City Code for a preservation program consistent with the Federal and State Certified Local Government requirements.

Goal HCR-2 A comprehensive, citywide preservation program that identifies, protects, and assists in the preservation of Sacramento’s historic and cultural resources.

Policy HCR-2.1 **Administration of Functions and Programs.** The City shall retain qualified Preservation staff, including a Preservation Director, and provide support to administer the City’s preservation functions and programs, including the Preservation Commission.

Policy HCR-2.2 **Certified Local Government.** The City shall maintain its federal status as a Certified Local Government (CLG) and make full use of its authority to designate local landmarks and historic districts and apply for state and federal historic preservation grants.

Policy HCR-2.3 **Sacramento Register.** The City shall maintain and update the Sacramento Register of Historic and Cultural Resources on a regular basis, including proactively identifying and listing additional unidentified landmarks and historic districts, and deleting resources that do not meet the criteria for listing.

Policy HCR-2.4 **Incorporating Preservation into Comprehensive Planning.** The City shall continue to consider historic and cultural resources in its current and long-term comprehensive planning efforts. To this end, the City shall incorporate specific preservation goals, policies, and programs into Community Plan and Specific Plan updates and neighborhood planning efforts, as appropriate.

Policy HCR-2.5 **Code Compliance.** The City’s Code Enforcement, Building, and Preservation Planning Division staff shall work collaboratively to identify historic properties under code enforcement actions and facilitate repair work that brings historic properties into compliance, consistent.



- Policy HCR-2.7 **Funding and Financing Mechanisms.** As part of its preservation efforts, the City shall explore funding and financing mechanisms, such as public/private partnerships with business, education, and advocacy groups, in order to facilitate the preservation, rehabilitation, and/or adaptive reuse of historic resources.
- Goal HCR-3 Increased awareness and appreciation of the city’s heritage and its historic and cultural resources and the contribution they make to local sense of place, culture, and economic development.
- Policy HCR-3.1 **Education and Awareness.** The City shall foster an awareness of the importance of preserving the city’s heritage and cultural and historic resources in a manner that embraces and celebrates the community’s social and cultural diversity. This can include the following:
- The use of placemaking strategies that commemorate places of special social historical significance through public art practices,
 - Community planning policies, and/or
 - Cultural heritage celebrations.
- Policy HCR-3.2 **School Programming.** The City shall encourage and provide technical assistance to public and private schools in integrating local and architectural history into their curricula.
- Policy HCR-3.3 **Heritage Tourism.** The City shall work with the local tourism industry, property owners, businesses, non-profit organizations, and other public agencies to develop and promote Heritage Tourism opportunities, integrating efforts with ongoing initiatives for economic development and promotion of the creative economy.
- Policy HCR-3.4 **Recognizing Preservation Efforts.** The City shall support and recognize private and public preservation work by celebrating the stewards of historic and scenic resources who have completed particularly admirable rehabilitation projects and to others who have made special contributions to the preservation effort.
- Policy HCR-3.5 **Economic Benefits.** The City shall increase awareness of the economic benefits of preservation by providing information to owners of historic properties.



Policy HCR-3.6 **Public Participation.** The City shall continue to encourage public participation in the process for evaluating and preserving historic and cultural resources.

4.5.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project’s potential impacts related to cultural resources. In addition, a discussion of the project’s impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, an impact related to cultural resources is considered significant if the proposed project would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5;
- Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5; or
- Disturb any human remains, including those interred outside of dedicated cemeteries.

Method of Analysis

The analysis presented within this chapter is based primarily on the Cultural Resources Study prepared for the proposed project. The Cultural Resources Study included a cultural resources literature search, archival research, consultation with the NAHC, and field surveys. The methods of analysis are described in further detail below. Tom Origer & Associates also contacted the tribes identified by the NAHC as tribes with the potential to have knowledge regarding cultural resources in the project area. Further detail regarding the consultation conducted as part of the proposed project is included in Chapter 4.13, Tribal Cultural Resources, of this EIR.

Records Search Methods

A cultural resources records search for the project area was completed at the NCIC of the CHRIS at California State University, Sacramento. The records search was conducted to determine the extent of previous surveys within 0.25-mile radius of the proposed project location, and whether previously documented pre-contact or historic archaeological sites, architectural resources, or traditional cultural properties exist within the area. The archival searches of the archaeological and historical records, national and State databases, and historic maps included the following:

- California Register of Historical Resources;
- National Register Information System website;
- Historic Property Data File (HPDF) for Sacramento County (OHP 2012);
- California Inventory of Historical Resources (National Park Service 2018);
- Office of Historic Preservation, California Historical Landmarks website (OHP 2018);
- California Historical Landmarks (OHP 1996 and updates);
- California Points of Historical Interest (OHP 1992 and updates);
- Directory of Properties in the Historical Resources Inventory (1999);
- Caltrans Local and State Bridge Surveys (Caltrans 2018a and 2018b);
- Historic Spots in California (Kyle 2002).



Field Survey Methods

A mixed-strategy field survey was conducted at the project site on February 9 and 10, 2022. An additional site visit was conducted on February 16, 2022. Field conditions during the field survey and site visit were warm, clear, and dry. Most of the project site was examined by walking in zig-zags within 15-meter corridors and hoes were used as needed to expose the ground surface. Ground visibility ranged from excellent to poor, with vegetation and imported gravel being the primary hindrances. The area between Interstate 5 (I-5) and Bayou Way had been subject to several cultural resources studies and also recently developed with I-5 off/on ramps and connector roads, so the area was surveyed in a cursory manner.

The locations of the previously documented resources were reexamined, and the locations of all the buildings and structures observed on historical maps and aerial photos were examined to see if the resources still existed, and to determine the current state of the resources.

In addition to surface survey, attempts were made to observe subsurface soils. The banks of ditches and canals within and adjacent to the project site were examined, when possible. Three hand-dug borings were excavated using a 4-inch diameter barrel auger. One auger boring went to a depth of 100 centimeters and the other two went to a depth of 150 centimeters. The locations were chosen to avoid portions of the project site that were inundated during prehistoric times and to be within a geological formation that dates to the Holocene Epoch.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified above.

4.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5. Based on the analysis below, the impact is *less than significant*.

The 474.4-acre project site is undeveloped and consists entirely of agricultural land. The proposed project would include the development of an industrial park within a 353.5-acre portion of the project site. The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous, the potential for impacts to historical resources to occur from development of either project component would be similar. Thus, the following discussion applies to the potential for both project components to impact historical resources. Because installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway right-of-way (ROW) or in other previously disturbed areas, construction of the off-site force main alignment would not result in a substantial adverse change in the significance of a historical resource.

Industrial Park and Nonparticipating Parcels

As discussed above, known resource sites P-34-000876, P-34-000877, and P-34-000878 were previously recorded within the project site. However, all of the resource sites were evaluated and considered ineligible for the CRHR and NRHP. In addition,



the resource locations were revisited in 2011. All that remained of P-34-000876 were two building foundations, and both building locations of P-34-000877 and P-34-000878 had been demolished, and only a concrete pad remained. In addition, according to the Cultural Resources Study, previously recorded or new cultural resources were not identified within the project site. Thus, the proposed project would not result in a substantial adverse change in the significance of a historical resource.

Several ditches and canals are located within the project site. The development of flood control and irrigation infrastructure are activities that are important to the history of the Sacramento Valley; however, according to the Cultural Resources Study, the canal, the lone older ditch, and the modified low area that are located within the site were not viewed as contributors to the RD 1000. The on-site irrigation features do not display distinctive characteristics of a type, period, region, or method of construction. While the features could be related to the theme of agriculture, archival evidence did not indicate that the past owners of the project site were important to local, regional, or state history, and the features are unlikely to yield information important to the history of the local area, state, or nation. Therefore, the on-site irrigation features do not meet criteria for inclusion on the CRHR or NRHP.

Based on the above, the previously recorded historical resources on-site were not considered eligible for listing under the NRHP or CRHR, and have been demolished since their initial recordation. In addition, the on-site irrigation features do not meet criteria for inclusion on the CRHR or NRHP. While the proposed project would involve the demolition and removal of the building foundations associated with P-34-000876, and the concrete pad associated with P-34-000877 and P-34-000878, such resources are not considered historical resources pursuant to CEQA Guidelines, Section 15064.5. Therefore, the proposed project would not result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5, and a *less-than-significant* impact would occur.

Mitigation Measure(s)

None required.

4.5-2 Cause a substantial adverse change in the significance of a unique archeological resource pursuant to CEQA Guidelines, Section 15064.5 or disturb human remains, including those interred outside of dedicated cemeteries. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

As discussed above, the 474.4-acre project site is undeveloped and consists entirely of agricultural land. The proposed project would include the development of an industrial park within a 353.5-acre portion of the project site. The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous, the potential for impacts to archeological resources to occur from development of either project component would be similar. Thus, the following



discussion applies to the potential for both project components to impact historical resources. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

As part of the Cultural Resources Study prepared for the proposed project, Tom Origer & Associates conducted a pedestrian field survey of the project site, which did not reveal any evidence of archaeological resources. Auger borings were excavated in the on-site locations with the highest potential for buried resources, and archeological site indicators were not found in the auger borings or along any of the exposed banks within the site. Given the project site's history of disturbance through agricultural use, the potential for buried archeological deposits to occur in the sediments underlying the project site is low. However, due to the likelihood of pre-contact archaeological sites to be located along waterways, the potential exists for previously unknown archaeological resources to exist in the project area. In addition, due to the off-site force main's location underground, the possibility of construction of the proposed off-site improvements encountering unknown archaeological resources cannot be entirely ruled out.

Furthermore, the project area is in the southwestern portion of the territory once occupied by the Penutian-speaking Nisenan. While field surveys conducted by Tom Origer & Associates did not detect human remains, cultural sites, or artifacts of ceremonial significance within the project site, the potential for human remains to be discovered during construction cannot be eliminated due to the known prehistoric occupation of the project area by Native American tribes.

Although archeological resources have not been identified on the project site and, due to past ground disturbance, are not anticipated to occur, the possibility exists that previously unknown resources could be discovered within the project site during construction activities, as well as along the proposed off-site force main alignment. Therefore, construction activities associated with buildout of the proposed project could uncover undocumented archaeological resources and/or human remains. As such, the proposed project could cause a substantial adverse change in the significance of a unique archeological resource pursuant to CEQA Guidelines, Section 15064.5 or disturb human remains, including those interred outside of dedicated cemeteries, and a **significant** impact could occur.

Mitigation Measure(s)

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

- 4.5-2 *The following requirements shall be included through a notation on all project grading plans prior to the issuance of grading permits, to the satisfaction of the City Engineer.*

In the event subsurface deposits believed to be cultural or human in origin are discovered during construction, all work shall halt within a 50-foot radius of the discovery. A qualified professional archaeologist, meeting the



Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- *If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and agency notifications are not required.*
- *If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the City of Sacramento and applicable landowner. The project applicant shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Appropriate treatment measures that preserve or restore the character and integrity of a find may be, but are not limited to, processing materials for reburial, minimizing handling of historical objects, leaving objects in place within the landscape, construction monitoring of further construction activities, and/or returning objects to a location within the project area where they will not be subject to future impacts. Work shall not resume within the no-work radius until the applicant, through consultation, as appropriate, determines that the site either: 1) is not a historical resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) that the treatment measures have been completed to the City's satisfaction.*
- *If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify the City of Sacramento and the Sacramento County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner shall notify the NAHC, which then shall designate a Native American Most Likely Descendant (MLD) for the proposed project (Section 5097.98 of the PRC). The designated MLD shall have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC shall mediate (Section 5097.94 of the PRC). If an agreement is not reached, the landowner shall rebury the remains where they shall not be further disturbed (Section 5097.98 of the PRC). The burial shall also include either recording the site with the NAHC or the appropriate information*



center, using an open space or conservation zoning designation or easement, or recording a reinternment document with Sacramento County (AB 2641). Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

4.5-3 Cause a cumulative loss of cultural resources. Based on the analysis below, the cumulative impact is *less than significant*.

Generally, while some cultural resources may have regional significance, the resources themselves are site-specific, and impacts to them are project-specific. For example, impacts to a subsurface archeological find at one project site would not generally be made worse by impacts to a cultural resource at another site due to development of another project. Rather, the resources and the effects upon them are generally independent. A possible exception to the aforementioned general conditions would be where a cultural resource represents the last known example of its kind or is part of larger cultural resources such as a single building along an intact historic Main Street. For such a resource, cumulative impacts, and the contribution of a project to them, may be considered cumulatively significant.

As described throughout this Chapter, known resource sites P-34-000876, P-34-000877, and P-34-000878 were previously recorded within the project site. However, all of the resource sites were evaluated and considered ineligible for the CRHR and NRHP. The resource locations were revisited and all that remained were two building foundations and a concrete pad. In addition, the on-site irrigation features do not meet criteria for inclusion on the CRHR or NRHP. Known archeological resources do not exist within the project site. Thus, the proposed project would not result in a substantial adverse change in the significance of a known cultural. Furthermore, implementation of the project-specific mitigation measure set forth in this chapter (Mitigation Measure 4.5-2) would ensure that potential impacts related to disturbance of unknown cultural resources within the site are reduced to less-than-significant levels.

Similar to the proposed project, future development projects within the City would be required to implement project-specific mitigation to ensure any potential impacts to identified cultural resources are reduced to a less-than-significant levels. For example, 2040 General Plan policies to reduce potential impacts call for the maintenance and preservation of historic and cultural resources throughout the City (Policy HCR-1.1 and HCR-1.2), implementation of applicable laws and regulations (Policy HCR-1.14), early consultation with owners and land developers to minimize effects (Policy HCR-1.6) and encouragement of adaptive reuse of historic resources (Policy HCR-1.12).



Demolition of historic resources is deemed a last resort (Policy HCR-1.10). Given that cultural resource impacts are generally site-specific and each future project within the City would be required to adhere to City policies, any potential impacts associated with cumulative buildout of the planning area would not combine to result in a significant cumulative impact.

Based on the above information, implementation of the aforementioned mitigation measures would reduce all project-specific impacts to less-than-significant levels, and the potential for impacts related to a cumulative loss of cultural resources, to which implementation of the proposed project might contribute, would be ***less than significant***.

Mitigation Measure(s)

None required.



4.6 GEOLOGY AND SOILS

4.6 GEOLOGY AND SOILS

4.6.1 INTRODUCTION

The Geology and Soils chapter of this EIR describes the geologic and soil characteristics of the project site and evaluates the extent to which implementation of the proposed project could be affected by unstable earth conditions and various geologic and geomorphic hazards. In addition, the chapter evaluates whether the proposed project would result in any adverse impacts to paleontological resources. Information presented within this chapter is primarily drawn from a Preliminary Geotechnical Exploration prepared by ENGEO, Inc. (see Appendix G),¹ the City of Sacramento 2040 General Plan,² the 2040 Technical Background Report,³ and the associated Master EIR (MEIR).⁴

As discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

4.6.2 EXISTING ENVIRONMENTAL SETTING

Background setting information regarding the geology and soils, seismicity, and paleontological resources associated with the project site and the surrounding region is provided below.

Regional Setting

The project site is located within the center of the Sacramento Valley within the Great Valley Geomorphic Province of California. The Sacramento Valley forms the northern third of the Great Valley, which includes approximately 33,000 square miles and fills a northwest-trending structural depression bounded on the west by the Great Valley Fault Zone and the Coast Ranges, and on the east by the Sierra Nevada and the Foothills Fault Zone.

Regional Geology

The project site is located in the Great Valley Geomorphic Province. The Great Valley Geomorphic Province consists of a deep, northwest-trending sedimentary basin that borders the east of the Coast Ranges. The Great Valley Geomorphic Province is a flat alluvial plain approximately 50 miles wide and 400 miles long in the central portion of California. The northern portion of the Great Valley Geomorphic Province is the Sacramento Valley drained by the

¹ ENGEO, Inc. *Preliminary Geotechnical Exploration*. May 5, 2022.

² City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

³ City of Sacramento. *2040 Technical Background Report*. November 2020.

⁴ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



Sacramento River, and the southern part is the San Joaquin Valley drained by the San Joaquin River. The valley is surrounded by the Sierra Nevada to the east, the Tehachapi Mountains to the south, Coastal Range to the west, and Cascade Range to the north.

The Great Valley has been and is presently being filled with sediments primarily derived from the Sierra Nevada. The impact of periodic glaciation of the Sierra Nevada during the last global climate change was strongly felt by the Sacramento Valley River systems. Huge quantities of sediments were moved through the river systems fed by alpine glaciers during episodic Pleistocene glaciations. As periods of glaciation ended, rivers draining the Sierra Nevada were made even more powerful by the considerably wetter climate and abundant meltwater. Abundant sediments left from the retreating glaciers were carried downstream into the Sierra Foothills and into the Sacramento Valley. At least four pulses of glacial outwash deposition are known to have taken place during glacial episodes of the past two million years. The deposits extend to depths of up to three miles on the western side of the Sacramento Valley and gradually thin out on the eastern side.

Regional Seismicity

A fault is defined as a fracture or zone of closely associated fractures along which rocks on one side have been displaced with respect to rocks on the other side. A fault zone is a zone of related faults that is commonly braided and subparallel, but may be branching or divergent. Movement within a fault causes an earthquake. When movement occurs along a fault, the energy generated is released as waves that cause ground shaking. Ground shaking intensity varies with the magnitude of the earthquake, the distance from the epicenter, and the type of rock or sediment through which the seismic waves move.

The potential risk of fault rupture is based on the concept of recency and recurrence. Fault rupture hazards occur near active faults and tend to reoccur along the surface traces of previous fault movements. The California Geological Survey defines an “active fault” as one that has had surface displacement within the past 11,000 years (Holocene). Potentially active faults are defined as faults that have ruptured between 11,000 and 1.6 million years before the present (Quaternary). Faults are generally considered inactive if evidence of displacement is not present during the Quaternary.

The intensity of ground shaking resulting from an earthquake is a function of the size of the earthquake, the duration of the energy release, the distance from the subject location, and the ability of the geologic materials to transmit the energy. In general, the greater the energy release and the closer the center of release to the site, the greater the intensity of the ground shaking.

A total of three fault systems and/or fault zones have been identified as potential seismic sources within the project region, including the Great Valley fault system, the Hunting Creek fault system, and the Foothills Fault zone. Based upon seismologic and geologic conditions, the MEIR determined that the maximum level of ground motion potentially experienced in the City would occur as a result of a 6.5 magnitude earthquake on the Foothills Fault zone or the Great Valley fault. Minor ground shaking can result in partial collapse of buildings, and extensive damage in poorly built or sub-standard structures.

Project Site Characteristics

The project site consists of approximately 474.4 acres located to the southeast of the intersection of Interstate 5 (I-5) and Power Line Road in Sacramento County, California. The topography of



the site gently slopes from the east to the west, with elevations ranging from approximately 11 feet to 27 feet above sea level (asl). The project site is currently undeveloped, and generally consists of seasonal grasses. Drainage channels cross the site in north to south and east to west directions, and additional channels border the project site along the southern and western borders.

The geologic conditions on the project site are discussed below in further detail, including descriptions of existing site geology, subsurface soil conditions, seismicity and ground shaking, potential for earthquake-induced liquefaction and subsidence, and expansive soils. In addition, this section includes a description of known paleontological resources within the project area.

Site Geology and Subsurface Conditions

According to the Preliminary Geotechnical Exploration, the soils within the site were mapped as Holocene Alluvium, Holocene Basin Deposits, and the Middle Unit of the Riverbank Formation. Holocene Alluvium is described as unweathered gravel, sand, and silt that is poorly to moderately sorted when deposited by the Sacramento River; although mapped within the project site, ENGEO, Inc. did not encounter sediments of this description on-site during subsurface explorations. Rather, explorations within the Holocene Alluvium area encountered sediments indicative of Holocene Basin Deposits, which are mapped in the eastern portion of the site. Holocene Basin deposits are described as dark gray to black fine-grained sediments deposited by standing or slow-moving water in topographic lows. The older Pleistocene Riverbank Formation is mapped along the eastern site boundary and is described as compact alluvium consisting of gravel, sand, silt, and clay deposits. Based on the Preliminary Geotechnical Exploration, the Riverbank Formation underlies the Holocene Basin Deposits.

As part of the Preliminary Geotechnical Exploration, ENGEO, Inc. drilled six borings on-site to depths ranging from 11.5 feet to 18 feet below surface level, the locations of which are shown in Figure 4.6-1. In addition, two cone penetration tests were performed to a maximum depth of approximately 50 feet.

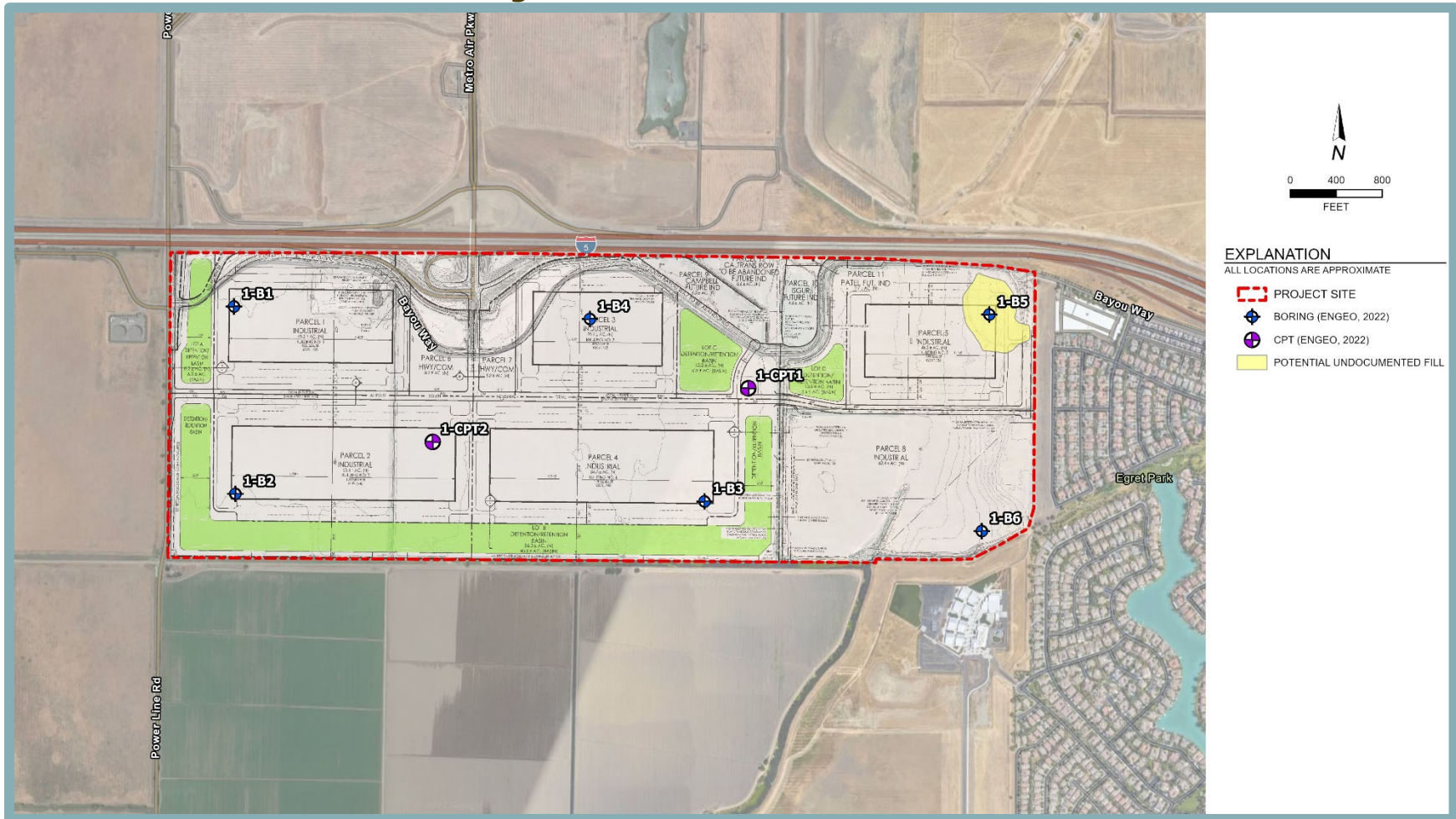
Borings performed by ENGEO, Inc. generally encountered surficial soil consisting of hard lean to fat clay underlain by stiff to hard fat clay. Borings 1-B5 and 1-B6 encountered poorly graded sand with clay and gravel and well-graded sand with silt, respectively, below the lean clay, at depths ranging from 13 feet to 16 feet below ground surface. Undocumented fill was encountered at Boring 1-B5 to a depth of approximately four feet below ground surface.

Seismicity and Ground Shaking

The project site is in a region of California characterized by low historical seismic activity and a low ground-shaking hazard. According to the Preliminary Geotechnical Exploration, the site does not include any active faults and is not located within an Alquist-Priolo Special Studies Zone. As discussed above, a total of three fault systems and/or fault zones have been identified as potential seismic sources within the project region, including the Great Valley fault system, the Hunting Creek fault system, and the Foothills Fault zone. Within a 100-kilometer (62.14-mile) radius of the project site three faults associated with the Great Valley fault system, and one fault associated with the Hunting Creek fault system have been identified.



**Figure 4.6-1
 Soil Boring and Cone Penetration Test Locations**



The nearest identified fault is the Dunnigan Hills fault of the Great Valley fault system, located approximately 13.1 miles from the site. In addition, according to the Preliminary Geotechnical Exploration, although not mapped in the United States Geological Survey (USGS) database, the Cleveland Hills Fault Segment, which is part of the Foothill Fault system and is located approximately 55 miles north of the project site, is considered to have the potential to impact the project site; the Cleveland Hills Fault Segment produced a Magnitude 5.8 earthquake in 1975. Other segments of the Foothills Fault system located as close as 27 miles to the project site are not considered active, but could be capable of a large magnitude earthquake.

Liquefaction

Liquefaction is the sudden loss of soil shear strength and sudden increase in porewater pressure caused by shear strains, as could result from an earthquake. Research has shown that saturated, loose to medium-dense sands with a silt content less than about 25 percent and located within the top 40 feet are most susceptible to liquefaction and surface rupture/lateral spreading.

The California Geological Survey (CGS) has designated certain areas within California as potential liquefaction hazard zones, which are areas considered at risk of liquefaction-related ground failure during a seismic event based upon mapped surficial deposits and the depth to the areal groundwater table. The project site is not in a mapped liquefaction hazard zone.⁵ According to the Preliminary Geotechnical Exploration, an on-site soil layer, located approximately 25 to 30 feet below ground level, could potentially liquefy during an earthquake event. However, sufficiently thick non-liquefiable soil that overlies the on-site liquefiable soils can provide a capping effect, which would result in much less ground surface deformation. Sufficiently non-liquefiable soils on-site are approximately 25 feet thick, and would provide a significant capping effect.

Subsidence/Settlement

According to the 2040 General Plan, subsidence/settlement is the gradual settlement of surface soil deposits with little horizontal motion. Sacramento County is affected by five causes of land subsidence/settlement: 1) compaction of unconsolidated soils from earthquakes; 2) compaction by heavy structures; 3) erosion of peat soils; 4) peat oxidation; and 5) groundwater withdrawal. Based on topographic and lithologic data, the Preliminary Geotechnical Exploration determined that the risk of subsidence/settlement is low at the project site. However, undocumented fill was encountered as boring location 1-B5 at a depth of approximately four feet below ground surface. According to the Preliminary Geotechnical Exploration, non-engineered fill can undergo excessive settlement, especially under new fill or building loads.

Expansive Soils

Expansive soils are characterized by their ability to undergo significant volume change due to variation in moisture content. Compressible materials consisting of surficial organic material, loose soils, undocumented fills, debris, rubble, rubbish, etc., are considered unsuitable materials for support of proposed structures as such materials can differentially settle. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may cause unacceptable settlement of structures. As stated above, the Preliminary Geotechnical Exploration determined that the soils encountered on-site have a moderate to high expansion potential.

⁵ California Geological Survey. *CGS Seismic Hazards Program: Liquefaction Zones*. Available at: https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad_0/explore?location=38.657409%2C-121.556164%2C13.28. Accessed October 2023.



Groundwater

ENGEO, Inc. observed groundwater in two of the on-site borings. Groundwater was encountered at approximately 18 feet below ground surface at boring location 1-B5, and at approximately ten feet below ground surface at boring location 1-B6. In addition, ENGEO, Inc. performed pore pressure dissipation tests as part of the cone penetration tests conducted on-site to measure hydrostatic conditions and estimate the depth to groundwater. The cone penetration tests performed by ENGEO, Inc. consisted of using a rig to push the cone penetrometer into the ground to measure the resistance of the soil against the cone penetrometer. The interpreted depth to groundwater at 1-CPT1 was 5.5 feet below ground surface, and 3.8 feet below ground surface at 1-CPT2.

Paleontological Resources

Paleontological resources include fossil remains, as well as fossil localities and formations, which have produced fossil material in other nearby areas. According to the MEIR, although discoveries of such resources have been made within the City in the past, the City is not considered sensitive for the presence of paleontological resources. Paleontological resources have been found in five localities in Sacramento County: the Riverbank formation at the former Arco Arena; along Chicken Ranch Slough near Howe Avenue and Arden Way; at the Teichert Gravel Pit and the Davis Gravel Pit; and on Ehrhardt Avenue, near the Sacramento Regional Wastewater Treatment Plant. The closest known paleontological resources found within the County were discovered at the former Arco Area site, approximately two miles southeast of the project site.

4.6.3 REGULATORY CONTEXT

The following section is a brief summary of the regulatory context under which soils, geology, seismic hazards, and paleontological resources are managed at the federal, State, and local levels.

Federal Regulations

The following are the federal environmental laws and policies relevant to soils, geology, seismic hazards, and paleontological resources.

Federal Earthquake Hazards Reduction Act

Passed by Congress in 1977, the Federal Earthquake Hazards Reduction Act is intended to reduce the risks to life and property from future earthquakes. The Act established the National Earthquake Hazards Reduction Program (NEHRP). The goals of NEHRP are to educate and improve the knowledge base for predicting seismic hazards, improve land use practices and building codes, and to reduce earthquake hazards through improved design and construction techniques.

International Building Code

The Uniform Building Code (UBC) was first published in 1927 by the International Council of Building Officials and is intended to promote public safety and provide standardized requirements for safe construction. The UBC was replaced in 2000 by the new International Building Code (IBC), published by the International Code Council (ICC), which is a merger of the International Council of Building Officials' UBC, Building Officials and Code Administrators International's National Building Code, and the Southern Building Code Congress International's Standard Building Code. The intention of the IBC is to provide more consistent standards for safe construction and eliminate any differences between the three preceding codes. All State building standard codes are based on the federal building codes.



Federal Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained through the National Pollutant Discharge Elimination System (NPDES) permit program or point sources are discrete conveyances such as pipes or man-made ditches.

Section 402 of the CWA mandates that certain types of construction activities comply with the requirements of the NPDES stormwater program. The Phase II Rule, issued in 1999, requires that construction activities that disturb land equal to or greater than one acre require permitting under the NPDES program. In California, permitting occurs under the General Permit for Stormwater Discharges Associated with Construction Activity, issued to the SWRCB, implemented and enforced by the nine Regional Water Quality Control Boards (RWQCBs).

As of July 1, 2010, all dischargers with projects that include clearing, grading or stockpiling activities expected to disturb one or more acres of soil are required to obtain compliance under the NPDES Construction General Permit Order 2009-0009-DWQ. The General Permit requires all dischargers, where construction activity disturbs one or more acres, to take the following measures:

1. Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to include a site map(s) of existing and proposed building and roadway footprints, drainage patterns and stormwater collection and discharge points, and pre- and post- project topography;
2. Describe types and placement of Best Management Practices (BMPs) in the SWPPP that will be used to protect stormwater quality;
3. Provide a visual and chemical (if non-visible pollutants are expected) monitoring program for implementation upon BMP failure; and
4. Provide a sediment monitoring plan if the area discharges directly to a water body listed on the 303(d) list for sediment.

To obtain coverage, a SWPPP must be submitted to the RWQCB electronically and a copy of the SWPPP must be submitted to Sacramento County. When project construction is completed, the landowner must file a Notice of Termination (NOT).

State Regulations

The following are the State environmental laws and policies relevant to soils, geology, seismic hazards, and paleontological resources.

Alquist-Priolo Earthquake Fault Zoning Act

The 1972 Alquist-Priolo Earthquake Fault Zone Act was passed to prevent the new development of buildings and structures for human occupancy on the surface of active faults. The Act is directed at the hazards of surface fault rupture and does not address other forms of earthquake hazards. The locations of active faults are established into fault zones by the Alquist-Priolo Fault Zone Act. Local agencies regulate any new developments within the appropriate zones in their jurisdiction.

The Alquist-Priolo Fault Zone Act regulates development near active faults so as to mitigate the hazard of surface fault rupture. The Alquist-Priolo Fault Zone Act requires that the State Geologist



(Chief of the California Department of Mines and Geology [CDMG]) delineate “special study zones” along known active faults in California. Cities and counties affected by the special study zones must regulate certain development projects within the special study zones. The Alquist-Priolo Fault Zone Act prohibits the development of structures for human occupancy across the traces of active faults. According to the Alquist-Priolo Fault Zone Act, active faults have experienced surface displacement during the last 11,000 years. Potentially active faults are those that show evidence of surface displacement during the last 1.6 million years. A fault may be presumed to be inactive based on satisfactory geologic evidence; however, the evidence necessary to prove inactivity sometimes is difficult to obtain and may not exist.

Seismic Hazards Mapping Act

The California Seismic Hazards Mapping Act of 1990 (California Public Resources Code Section 1690-2699.6) addresses non-surface rupture earthquake hazards, including liquefaction, induced landslides, and subsidence. A mapping program is also established by this Act, which identifies areas within California that have the potential to be affected by such non-surface rupture hazards. The Seismic Hazards Mapping Act specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.

California Building Standards Code

The State of California regulates development within the State through a variety of tools that reduce or mitigate potential hazards from earthquakes or other geologic hazards. The 2022 California Building Standards Code (CBSC) (California Code of Regulations, Title 24) governs the design and construction of all building occupancies and associated facilities and equipment throughout California. In addition, the CBSC governs development in potentially seismically active areas and contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The California building standards include building standards in the national building code, building standards adapted from national codes to meet California conditions, and building standards adopted to address particular California concerns. It should be noted that the CBSC is updated on a triennial cycle. The 2022 CBSC, which contains new code changes, became effective on January 1, 2023.

Local Regulations

The following are the local environmental laws and policies relevant to soils, geology, seismic hazards, and paleontological resources.

City of Sacramento 2040 General Plan

The following goals and policies from the City of Sacramento 2040 General Plan related to soils, geology, seismic hazards, and paleontological resources that are applicable to the proposed project.

Environmental Resources and Constraints Element

Goal ERC-1 Responsible management of water resources that preserves and enhances water quality and availability.

Policy ERC-1.4 **Construction Site Impacts.** The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster



development), source controls, stormwater treatment, runoff reduction measures, best management practices (BMPs), Low Impact Development (LID), and hydromodification strategies to avoid or minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

Goal ERC-7 Protection of life and property from seismic hazards.

Policy ERC-7.1 **Expansive Soils and Liquefaction.** In areas of expansive soils and high liquefaction risk, the City shall continue to require that project proponents submit geotechnical investigation reports and demonstrate that the project conforms to all recommended mitigation measures prior to City approval.

Policy ERC-7.2 **Seismic Stability.** In accordance with the California Building Code, the City shall regulate structures intended for human occupancy to ensure they are designed and constructed to retain their structural integrity when subjected to seismic activity

City of Sacramento Municipal Code

Sections of the City's Municipal Code related to soils, geology, seismic hazards, and paleontological resources that are applicable to the proposed project are presented below.

Sacramento City Code Chapter 15.88

The City of Sacramento's Grading, Erosion, and Sediment Control Ordinance (Chapter 15.88 of the City's Municipal Code) is enacted for the purpose of regulating grading on property within the City limits to safeguard life, limb, health, property and the public welfare; to avoid pollution of watercourses with nutrients, sediments, or other materials generated or caused by surface water runoff; to comply with the City's NPDES Permit; and to ensure that the intended use of a graded site within the City limits is consistent with the City's 2040 General Plan, any specific plans adopted thereto and all applicable City ordinances and regulations. The grading ordinance is intended to control all aspects of grading operations within the City. Chapter 15.88 requires that development projects comply with the requirements of the City's Stormwater Quality Improvement Plan (SQIP). The SQIP outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management Program, which is based on the NPDES Municipal Stormwater Discharge Permit. The comprehensive Stormwater Management Program includes pollution-reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

4.6.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to soils, geology, seismic hazards,



and paleontological resources. A discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, an impact related to soils, geology, seismic hazards, and paleontological resources is considered significant if the proposed project would:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault;
 - Strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction; and
 - Landslides;
- Result in substantial soil erosion or the loss of topsoil;
- 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;
- Be located on expansive soil, as defined in Table 18-1B of the UBC (1994), creating substantial direct or indirect risks to life or property;
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (see Chapter 5, Effects Not Found to be Significant); or
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As noted above, issues related to whether the proposed project would result in the following are discussed in Chapter 5, Effects Not Found to be Significant, of this EIR:

- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Method of Analysis

The analysis presented in this chapter is based primarily on the Preliminary Geotechnical Exploration prepared for the proposed project by ENGEО, Inc. Information related to paleontological resources is sourced primarily from the City's 2040 General Plan and the 2040 General Plan Draft Background Report.

The Preliminary Geotechnical Exploration prepared for the proposed project by ENGEО, Inc. drew on information from previous studies conducted within the project area, including regional geologic maps and fault maps prepared by the California Department of Conservation's CGS. In addition, ENGEО, Inc. performed field explorations of the project site on March 22, 23, and 30, 2022. The field explorations included drilling six borings and advancing two cone penetration test soundings at the locations indicated in Figure 4.6-1. In order to assess subsurface conditions of the project site, a truck-mounted CME-55 drill rig and crew were used to advance the borings to depths ranging from 11.5 to 18 feet below existing grade. The cone penetration tests performed by ENGEО, Inc. consisted of using a rig to push the cone penetrometer to a maximum depth of 50 feet into the ground to measure the resistance of the soil against the cone penetrometer. Cone



readings were taken at approximately five-centimeter intervals with a penetration rate of two centimeters per second.

ENGEO, Inc. performed laboratory tests on selected soil samples from the on-site borings to evaluate the engineering properties of the soils, including moisture content, dry density, unconfined compression, plasticity index, and expansion index. In addition, ENGEO, Inc. calculated liquefaction potential of the soils in accordance with the standards of the 2019 California Building Code (CBC) and the American Society of Civil Engineers (ASCE).

The analysis presented within the Preliminary Geotechnical Exploration focuses on the proposed project's potential to result in the risk of personal injury, loss of life, and damage to property as a result of existing geologic and geotechnical conditions within the project area.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified above.

4.6-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. Based on the analysis below, the impact is *less than significant*.

Due to the regional nature of geologic conditions, seismic conditions would be the same for both the industrial park and nonparticipating parcels portions of the project site. As such, the following analysis applies to both components of the proposed project. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas and would not include aboveground structures, construction of the off-site force main alignment would not cause potential substantial adverse effects, including the risk of loss, injury, or death, involving rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure.

Industrial Park and Nonparticipating Parcels

As discussed above, the project site is not located within an Alquist-Priolo Fault Zone. Evidence of recent faulting within the project area has not been detected, nor have any active faults been mapped at or near the project site. As discussed above, a total of three fault systems and/or fault zones have been identified as potential seismic sources within the project region, including the Great Valley fault system, the Hunting Creek fault system, and the Foothills Fault zone. Within a 100-kilometer (62.14-mile) radius of the project site three faults associated with the Great Valley fault system, and one fault associated with the Hunting Creek fault system have been identified. The nearest identified fault is the Dunnigan Hills fault of the Great Valley fault system, located approximately 13.1 miles from the site. In addition, according to the Preliminary Geotechnical Exploration, although not mapped in the USGS database, the Cleveland Hills Fault Segment, which is part of the Foothill Fault system and is located approximately 55 miles north of the project site, is considered to have the potential to



impact the project site; the Cleveland Hills Fault Segment produced a Magnitude 5.8 earthquake in 1975. Other segments of the Foothills Fault system located as close as 27 miles to the project site, but are not considered active. Therefore, the Preliminary Geotechnical Exploration concluded that ground rupture is unlikely to occur at the project site.

While lower-intensity earthquakes could potentially occur at the site, the design of project structures would be required to adhere to the provisions of the 2022 CBSC. The 2022 CBSC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. Specifically, projects designed in accordance with the CBSC should be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural damage. Although conformance with the CBSC does not guarantee that substantial structural damage would not occur in the event of a maximum magnitude earthquake, conformance with the CBSC can reasonably be assumed to ensure structures would be survivable, allowing occupants to safely evacuate in the event of a major earthquake.

Furthermore, as noted in the Preliminary Geotechnical Exploration, due to the relatively low seismicity of the project area, the potential for seismically induced damage to the proposed structures due to surface rupture and settlement is minimal. Impacts related to liquefaction and landslide are discussed in Impact 4.6-3 of this chapter.

Overall, the proposed development would not be subject to substantial risks related to fault rupture hazards. Due to the relatively low seismicity of the area, compliance with CBSC requirements related to seismic design, and the lack of substantial natural slopes on-site, the potential for the project to expose people or structures to the risk of loss, injury, or death involving rupture of an earthquake fault, strong ground shaking, or ground failure would be **less-than-significant**.

Mitigation Measure(s)

None required.

4.6-2 Result in substantial soil erosion or the loss of topsoil. Based on the analysis below, the impact is less than significant.

Due to the regional nature of geologic conditions, conditions related to soil erosion would be the same for both the industrial park and nonparticipating parcels portions of the project site. As such, the following analysis applies to both components of the proposed project. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Erosion refers to the removal of soil from exposed bedrock surfaces by wind or water. Although naturally occurring, erosion is often accelerated by human activities that disturb soil and vegetation. Grading, excavation, removal of vegetation cover, and



loading activities associated with construction could temporarily increase erosion, runoff, and sedimentation. Ground-disturbing activities associated with the proposed project could also result in soil compaction and wind erosion effects that could adversely affect soils and reduce the revegetation potential within the construction and staging areas. The topography of the project site is relatively level, and upon development of the site with buildings and structures, the amount of exposed soil that may be lost due to wind or stormwater runoff would be minimized, as the site would be largely covered with impervious surfaces.

The City of Sacramento's Grading Ordinance requires that development projects comply with the requirements of the City's SQIP. The SQIP outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management Program. The City's Stormwater Management Program is based on the NPDES municipal stormwater discharge permit. The comprehensive Stormwater Management Program includes pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

NPDES permits are required for the discharge of pollutants to waters of the United States, which includes any discharge to surface waters, including lakes, rivers, streams, bays, dry stream beds, wetlands, and storm sewers. The RWQCB issues permits in lieu of direct issuance by the Environmental Protection Agency (EPA). The terms of the NPDES permits implement pertinent provisions of the Federal CWA. In accordance with the NPDES General Construction Permit, a SWPPP is required for any project that disturbs at least one acre of soil. Given that the proposed project could disturb a maximum of at least 436.5 acres within the site, the project would be required to prepare a SWPPP and submit a Notice of Intent (NOI) to the RWQCB.

The SWPPP would be kept on site during construction activity and made available upon request to representative of the City of Sacramento, the County of Sacramento, or the Central Valley RWQCB. The SWPPP would identify pollutant sources that may affect the quality of stormwater associated with construction activity, and identify stormwater pollution prevention measures to be implemented to reduce pollutants in stormwater discharges during and after construction. Therefore, the SWPPP would also include a description of potential pollutants and hazardous materials present on site during construction. The SWPPP would include details of how the sediment and erosion control practices, also known as BMPs would be implemented. Implementation of the SWPPP would comply with City, State, and federal water quality requirements. Development of the SWPPP would include plans to treat stormwater runoff in accordance with the standards of the California Stormwater Management Practice New Development and Redevelopment Handbook, the City's SQIP, and the *Stormwater Quality Design Manual for the Sacramento Region* (Sacramento Stormwater Quality Partnership 2014). The plan would include drainage design from all paved surfaces, including streets, parking lots, driveways, and roofs, as well as landscaping.

Furthermore, Chapter 15.88 of the City Code regulates grading and erosion by requiring all projects that grade within the City, except where exempt, to submit an application for review by the City prior to approval of a grading permit. The application must include a grading plan and a sediment and erosion plan which would be reviewed for safety of grading and potential for erosion. The project would be subject to



compliance with Chapter 15.88 of the City Code and the project applicant would be required to prepare a grading plan and a sediment and erosion plan. The grading plan and a sediment and erosion plan would include erosion control measures and sediment control measures to ensure the stability of the ground surface and soil within the project site during construction activities, as well as during installation of the off-site force main.

Based on the above, development of the proposed project would not result in substantial soil erosion or the loss of topsoil with the preparation of an SWPPP in accordance with the NPDES General Construction Permit and preparation of a grading plan and a sediment and erosion plan in accordance with the City Code. Therefore, a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.6-3 Be located on a geological 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, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Due to the regional nature of geologic conditions, soil conditions would be the same for both the industrial park and nonparticipating parcels portions of the project site. As such, the following analysis applies to both components of the proposed project. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main would not result in potential environmental impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil.

Industrial Park and Nonparticipating Parcels

Issues associated with unstable geologic units and/or soils, including expansive soils, landslide, lateral spreading, subsidence, liquefaction, and collapse are discussed below.

Landslides

A landslide is defined as the movement of a mass of rock, debris, or earth down a slope. Almost every landslide has multiple causes. Slope movement occurs when forces acting down-slope exceed the strength of the earth materials that compose the slope. Landslides in California occur mainly due to intense rainfall or are triggered by earthquakes. According to the CGS, the project site is not currently within a State of



California Seismic Hazard Zone for seismically induced land sliding.⁶ In addition, the project site slopes gently from east to west, with elevations ranging from approximately 11 feet to 27 feet asl, and does not have any steep slopes. Given that the project site is not mapped in a landslide zone and the site does not contain any slopes that could be subject to landslide risks, development of the project site with industrial uses and associated improvements would not result in on- or off-site landslide hazards.

Lateral Spreading

Lateral spreading is associated with terrain near free faces such as excavations, channels, or open bodies of water. The project site slopes gently from east to west, with elevations ranging from approximately 11 feet to 27 feet asl, and does not have any steep slopes. The Preliminary Geotechnical Exploration determined that based on topographic and lithologic data, the risk of lateral spreading is low to negligible at the project site. Thus, the proposed project would not be subject to substantial risks related to lateral spreading.

Subsidence/Settlement

Subsidence is the settlement of soils of very low density, generally from either oxidation of organic material, desiccation and shrinkage, or both, following drainage. Subsidence takes place gradually, usually over a period of several years, and is a common consequence of liquefaction. As discussed above, during the field exploration of the project site, undocumented fill was encountered at a depth of approximately four feet below ground surface at Boring 1-B5. According to the Preliminary Geotechnical Exploration, non-engineered fill can undergo excessive settlement, especially under new fill or building loads. ENGeo, Inc. provides the recommendation that the extent and depth of non-engineered fill on-site should be evaluated further, and that the undocumented fill should be removed and replaced with competent native soil. Without removal of the non-engineered fill, the proposed project could be subject to subsidence/settlement.

Liquefaction

Liquefaction occurs when saturated fine-grained sand and/or silts lose their physical strength temporarily during earthquake-induced shaking and behave as a liquid. Soil most susceptible to liquefaction is clean, loose, saturated, uniformly graded, fine-grained sand. As discussed above, ENGeo, Inc. calculated liquefaction potential of the on-site soils in accordance with the standards of the CBC and the ASCE.

Based on the liquefaction analysis prepared as part of the Preliminary Geotechnical Exploration, liquefiable soil was identified at 1-CPT1 at a depth of 25 to 30 feet below ground surface. However, according to ENGeo, Inc. a sufficiently thick non-liquefiable “capping” layer is present above the liquefiable soil that would prevent significant vertical settlement at the site. As such, the Preliminary Geotechnical Exploration determined that while liquefaction of the select subsurface soil layers is possible at the project site, the overall ground surface deformation, as a result of theoretical liquefaction-induced settlement, would not be considered severe. Nonetheless, the Preliminary Geotechnical Exploration concluded that the results of the liquefaction

⁶ Department of Conservation. CGS Information Warehouse: Landslides. Available at: <http://maps.conservation.ca.gov/cgs/informationwarehouse/>. Accessed January 2023.



analysis are preliminary, and should be further evaluated with a design-level geotechnical exploration. Without confirmation from such a report, the potential exists for the proposed project to be exposed to substantial risks related to liquefaction.

Collapse

As discussed above, the project site is not located within an Alquist-Priolo Fault Zone and is not underlain by active fault segments. Additionally, all structures constructed as part of the proposed project would be required to adhere to the provisions of the most recent version of the CBCS in effect at the time of building permit issuance. Structures built according to the seismic design provisions of current building codes would be able to resist major earthquakes without collapse, but with some structural, as well as non-structural damage. Given the project's adherence to the CBCS requirements, the proposed project would not be subject to substantial risks associated with building collapse.

Expansive Soils

According to the Preliminary Geotechnical Exploration performed ENGeo, Inc., the project site contains soils made of clay with a high to very high expansion potential. Expansive soils have the potential to compromise the structural integrity of project features, which could be a significant impact. Damage due to volume changes associated with expansive soil can be reduced by capping the expansive soil with a blanket of low-expansive soil, using a rigid mat foundation that is designed to resist the settlement and heave of expansive soil, or by deepening footings to below the zone of significant moisture fluctuation. The Preliminary Geotechnical Exploration includes recommendations to reduce potential damage to the proposed project, such as underlying building pads that extend at least ten feet laterally beyond building areas with low-expansive fill or lime treatment, and designing other structural elements, such as pavements and flatwork, for highly expansive soil conditions. Other corrective actions may include ground treatment processes and direction of surface water away from foundation soils. The project applicant would select one or more of the measures in consultation with qualified engineers before grading activities begin. However, without implementation of the aforementioned corrective actions, the proposed project would have the potential to be exposed to substantial risks related to expansive soils.

Conclusion

From a geotechnical standpoint, provided that the recommendations included in the Preliminary Geotechnical Exploration prepared for the proposed project are implemented into the project design and specifications, the geological and soil conditions on the site would be adequate to support development of the proposed project. However, conformance with such recommendations cannot be ensured, and, as a result, a **significant** impact could occur related to subsidence/settlement, liquefaction, and/or expansive soils.

Mitigation Measure(s)

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

- 4.6-3 *Prior to issuance of grading permits, the grading plans shall incorporate the geotechnical recommendations specified in the Preliminary*



Geotechnical Exploration prepared for the proposed project, including, but not limited to, earthwork recommendations, foundation wall recommendations, pavement recommendations, exterior flatwork recommendations, and the preparation of a design-level geotechnical report. All grading and foundation plans for the development must be reviewed and approved by the City Engineer and Chief Building Official, or their representative(s), prior to issuance of grading and building permits in order to ensure that recommendations in the Preliminary Geotechnical Exploration are properly incorporated and utilized in the project design.

4.6-4 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Based on the analysis below and with implementation of mitigation, the impact is less than significant.

Due to the regional nature of geologic conditions, the potential for the occurrence of paleontological resources or unique geologic features would be the same for both the industrial park and nonparticipating parcels portions of the project site. As such, the following analysis applies to both components of the proposed project. Because installation of the proposed off-site force main would occur either in existing roadway ROW or in other previously disturbed areas, construction of the off-site force main would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Industrial Park and Nonparticipating Parcels

As discussed above, the 474.4-acre project site is currently undeveloped, and generally consists of seasonal grasses. Drainage channels cross the site in north to south and east to west directions, and additional channels border the project site along the southern and western borders. According to the Preliminary Geotechnical Exploration, the soils within the site were mapped as Holocene Alluvium, Holocene Basin Deposits, and the Middle Unit of the Riverbank Formation, which are common to the project region. Therefore, the project site is unlikely to contain unique geologic features, and project buildout would not result in any impacts to such resources.

According to the City's 2040 General Plan MEIR, although discoveries of paleontological resources have been made within the City in the past, the City is not considered sensitive for the presence of paleontological resources. In addition, the localities in which paleontological resources have been discovered within Sacramento County are not located in the project vicinity; as discussed above, the closest known paleontological resources found within the County were discovered at the former Arco Area site, approximately two miles southeast of the project site. Therefore, the project site does not contain any known paleontological resources.

Although the proposed project would not have the potential to result in the destruction of unique geological features, previously unknown paleontological resources could exist within the project site and off-site improvement areas. Therefore, ground-disturbing activity, such as grading, trenching, or excavating associated with



implementation of the proposed project, could have the potential to disturb or destroy unknown paleontological resources, and a **significant** impact could occur.

Mitigation Measure(s)

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

- 4.6-4 *Should construction or grading activities result in the discovery of unique paleontological resources, all work within 100 feet of the discovery shall cease. The City of Sacramento Community Development Department shall be notified, and the resources shall be examined by a qualified archaeologist, paleontologist, or historian, at the developer's expense, for the purpose of recording, protecting, or curating the discovery as appropriate. The archaeologist, paleontologist, or historian shall submit to the City of Sacramento Community Development Department for review and approval a report of the findings and method of curation or protection of the resources. Work may only resume in the area of discovery when the preceding work has occurred.*

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

For further detail related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections, of this EIR.

4.6-5 Cumulative impacts to geology, soils, seismicity, and paleontological resources. Based on the analysis below, the cumulative impact is *less than significant*.

Due to the regional nature of geologic conditions, such conditions would be the same for both the industrial park and nonparticipating parcels portions of the project site. As such, the following analysis applies to both components of the proposed project. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Impacts to geology, soils, seismicity, and paleontological resources related to implementation of the proposed project are analyzed throughout this chapter. As discussed above, provided that the recommendations included in the Preliminary Geotechnical Exploration prepared for the proposed project are implemented into the project design and specifications, the geological and soil conditions on the site would be adequate to support development of the proposed project. Mitigation Measure 4.6-3, which requires preparation and submittal of a final design-level geotechnical report,



would ensure that such recommendations are implemented, thereby reducing project-specific impacts related to soil stability to a less-than-significant level. In addition, implementation of Mitigation Measure 4.6-4 would ensure that any previously unknown paleontological resources discovered on-site would not be adversely impacted.

While some geologic characteristics may affect regional construction practices, impacts and mitigation measures are primarily site-specific and project-specific. For example, impacts resulting from development on expansive soils at one project site are not worsened by impacts from development on expansive soils or undocumented fill at another project site. Rather, the soil conditions, and the implications of such conditions for each project, are independent.

As such, the potential for cumulative impacts related to geology, soils, seismicity, and paleontological resources, to which implementation of the proposed project might contribute, is ***less than significant***.

Mitigation Measure(s)

None required.



4.7 HAZARDS AND HAZARDOUS MATERIALS

4.7 HAZARDS AND HAZARDOUS MATERIALS

4.7.1 INTRODUCTION

The Hazards and Hazardous Materials chapter of the EIR describes existing and potentially occurring hazards and hazardous materials within the project area. The chapter includes a discussion of potential impacts posed by such hazards to the environment. In addition, surrounding land uses are discussed in order to provide an assessment of whether the project could impact surrounding land uses. The question of whether surrounding land uses could impact the proposed project is not a question requiring analysis under CEQA.¹ The Hazards and Hazardous Materials chapter is primarily based on information drawn from a Phase I Environmental Site Assessment (ESA) (see Appendix H) prepared for the project site by Environmental Investigation Services, Inc. (EIS),² as well as the City of Sacramento 2040 General Plan,³ and the City of Sacramento 2040 Master EIR (MEIR).⁴

As discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

4.7.2 EXISTING ENVIRONMENTAL SETTING

The following section includes a definition of hazardous materials and descriptions of the existing conditions associated with the project site related to hazards and hazardous materials.

Hazardous Materials

The term hazardous substance refers to both hazardous materials and hazardous wastes. A material is defined as hazardous if the material appears on a list of hazardous materials prepared by a federal, State, or local regulatory agency or if the material has characteristics defined as hazardous by such an agency. The California Environmental Protection Agency (Cal-EPA),

¹ Per the *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (CBIA), the California Supreme Court held that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment – and not the environment’s impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions.” (*Id.* at pp. 377-378.).

² Environmental Investigation Services, Inc. *Phase I Environmental Site Assessment – 3880, 3990, 4690, and 4696 Bayou Way, Sacramento County, California*. September 14, 2022.

³ City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

⁴ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



California Department of Toxic Substance Control (DTSC) defines hazardous waste, as found in the California Health and Safety Code Section 25141(b), as follows:

[...] its quantity, concentration, or physical, chemical, or infectious characteristics: (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; (2) pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of, or otherwise managed.

The following discussion focuses on the potential Recognized Environmental Conditions (RECs) associated with the project site. A REC indicates the presence or likely presence of any hazardous substances in, on, or at a property due to any release into the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.⁵

Additionally, the following includes a discussion of historical RECs associated with the project site. A historical REC indicates a past release of hazardous substances or petroleum products that has occurred in connection with a property and has been addressed to the satisfaction of the applicable regulatory authority. A historical REC does not have any property use restrictions, and, thus, does not have any use limitations in respect to future activities on the property. The following discussion also addresses the possibility of controlled RECs (CRECs) associated with the project site. A CREC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

Project Area Conditions

The project site currently consists of vacant, fallow agricultural land. Unnamed drainage canals run roughly north-south in both the western and eastern portions of the site. Numerous unimproved dirt roads provide access to the interior of the project site, which is subdivided into multiple agricultural plots. A cell tower with a diesel generator is located in the northwestern portion of the site. In addition, during a site reconnaissance, EIS observed a front-loading tractor in the northwestern part of site, along Bayou Way, and stockpiled soils to the west of the cell tower area.

The project site was historically used as hay fields, with intermittent rice fields from 1937 until at least 2020. Surrounding properties were also predominantly used as agricultural fields with rice fields or hay fields, with the exception of a single-family residence located to the south, and a Life Storage facility and the Westlake single-family residential subdivision constructed around 2006 to the east.

Surrounding existing land uses currently include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park,

⁵ ASTM International. *ASTM E1527, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. 2013.



Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

Potential On-Site Recognized Environmental Conditions

Based on the Phase I ESA prepared for the project site, the following discussion includes potential RECs within the project area.

Pesticides

Between the 1940s and 1970s, organochloride pesticides (OCPs) were commonly used in the U.S. for public health vector control, agricultural crop production, and pest control around structures. Although most OCPs were banned or withdrawn from use in the 1970s (including DDT), the compounds remain in the environment where surface soils associated with historical agricultural and termite control pesticides are present. As discussed above, the project site was historically used as hay fields, with possible intermittent rice fields from 1937 until at least 2020. Therefore, the potential exists for OCPs to be present in on-site soils.

Underground and Aboveground Storage Tanks

The Phase I ESA inspected the project site for indications of aboveground storage tanks (ASTs) (e.g., pavement bolts, containers, reservoirs, and generators) and underground storage tanks (USTs) (e.g., vent piping, dispensing equipment, pavement variations, and fill ports). Based on a record review conducted as part of the Phase I ESA, one building permit described the installation of an emergency backup generator with a 190-gallon subbase diesel fuel tank on existing concrete pad, in the area of the cell tower in the northwest portion of the project site (on APN 225-0020-035). However, leaking or staining was not observed. One approximately 300-gallon water tank, and one approximately 500-gallon trailer-mounted water tank were identified near the eastern boundary of the site. However, the Phase I ESA did not identify any RECs associated with the water tanks. The Phase I ESA also determined that the emergency backup generator with a 190-gallon subbase diesel fuel tank was not an REC. In addition, the Phase I ESA noted that indications of USTs were not observed on-site.

Stockpiled Soils

Stockpiled soils were observed in the northwest portion of the project site, to the east of the cell tower. The soils were determined to likely be associated with the recent construction of the Metro Air Parkway-I-5 bridge and interchange. Due to the lack of documentation associated with the source of the stockpiled soils, the Phase I ESA determined that the presence of unknown origin soil stockpile on the project site represents a potential environmental concern.

Solid Waste

The project site was inspected for indications of solid waste disposal (e.g., mounding, depressions, fill material, bins, debris, and active human use). Minor scattered solid waste was detected near the intersection of the eastern unnamed drainage canal and Bayou Way (on APN 225-0020-017). In addition, scattered solid waste including tires, burnt debris, and waste cement was detected between Bayou Way and I-5 (on APN 225-0030-024). Furthermore, small quantities (less than two quarts) of used motor oil and oil-stained cardboard were identified near the intersection of the eastern unnamed drainage canal and Bayou Way (on APN 225-0020-017). The Phase I ESA determined that the small quantities of waste are not an REC. However, EIS recommended that identified solid wastes be removed prior to redevelopment of the site.



Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs), often found in electrical equipment such as transformers, ballasts in fluorescent lighting, circuit breakers and switch gears, and hydraulic fluids, contain toxic compounds which attach themselves to human fat tissue and may act as possible carcinogens if ingested. One pad-mounted transformer associated with the cell tower near Bayou Way is located in the northwest portion of the project site (on APN 225-0020). However, leaking or staining was not observed. Other potential PCB-containing equipment within the project site were not observed during site reconnaissance. Thus, the Phase I ESA did not identify any RECs associated with PCBs project area.

Asbestos-Containing Building Materials

Asbestos is a set of six naturally occurring silicate minerals used commercially for their desirable physical properties. The prolonged inhalation of asbestos fibers can cause serious illnesses including malignant lung cancer, mesothelioma, and asbestosis. In the industrialized world, asbestos was phased out of building products mostly in the 1970s, with most of the remainder phased out by the 1980s. For buildings constructed prior to 1980 (29 Code of Federal Regulations [CFR] 1926.11) all thermal system insulation and surface materials must be designated as presumed asbestos-containing building materials (ACBMs) unless proved otherwise through sampling. While the project site has been used as hay fields, with intermittent rice fields from 1937 until at least 2020, the Phase I ESA noted that buildings were located within the project site prior to 1937. Therefore, while the structures have been removed from the site, residual ACBM may be present within the areas of former structures.

Lead-Based Paint

Lead is considered to be a harmful environmental pollutant. Within the U.S., most homes and other buildings built before 1960 contain heavily leaded paint. Some homes built as recently as 1978 may also contain lead paint. As discussed above, while the project site has been used as hay fields, with intermittent rice fields from 1937 until at least 2020, the Phase I ESA noted that buildings were located within the project site prior to 1937. Thus, while the structures have been removed from the site, residual lead-based paint (LBP) may be present within the areas of former structures.

Nearby Recognized Environmental Conditions

In an effort to fulfill due diligence requirements, EIS employed the services of Environmental Data Resources, Inc. (EDR) to identify sites listed on regulatory agency databases within approximate minimum search distances from the subject property with potential of existing environmental problems. The following sites were identified in the project vicinity:

- AT&T Mobility – 4690 Bayou Way;
- Kaweah Construction Company – 4401 N Bayou Way;
- MSA: Metro Air Park Storm Drain D-49 – 4565 West Bayou Road;
- West Lakeside Middle School/High School Expansion – Snelling Lane/Westlake Parkway;
- Northborough Elementary School – Banfield Drive/Minden Way;
- Westlake Elementary School – Del Paso Road/Wyndview Way;
- Natomas Middle School – 3700 Del Paso Road; and
- Proposed Terrace Park Elementary School – Greg Thatch Circle & Tres Peizas Way.

The Phase I ESA did not identify any potential risks to the project site associated with the above listed properties.



Nearest Airports

The closest public use airport to the project site is Sacramento International Airport, which is located approximately one mile to the northwest of the project site. The project site is not located in the vicinity of any private airstrips. According to the Sacramento International Airport Land Use Compatibility Plan (ALUCP), the western portion of the project site is located within Safety Zone 3, which is designated “Inner Turning Zone”, the south-central portion of the site is located within Safety Zone 4, which is designated “Outer Approach/Departure Zone”, and the eastern portion of the project site is located within Safety Zone 6, which is designated “Traffic Pattern Zone” (see Figure 4.7-1).

4.7.3 REGULATORY CONTEXT

The following discussion contains a summary of regulatory controls pertaining to hazardous substances, including federal, State, and local laws and ordinances.

Federal Regulations

Federal agencies that regulate hazardous materials include the U.S. Environmental Protection Agency (USEPA), the Occupational Safety and Health Administration (OSHA), the Department of Transportation (DOT), and the National Institute of Health (NIH). Prior to August 1992, the principal agency at the federal level regulating the generation, transport, and disposal of hazardous waste was the USEPA under the authority of the Resource Conservation and Recovery Act (RCRA). As of August 1, 1992, however, the California DTSC was authorized to implement the State’s hazardous waste management program for the USEPA. The USEPA continues to regulate hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). The following federal laws and related regulations govern hazardous materials.

Occupational Safety and Health Act

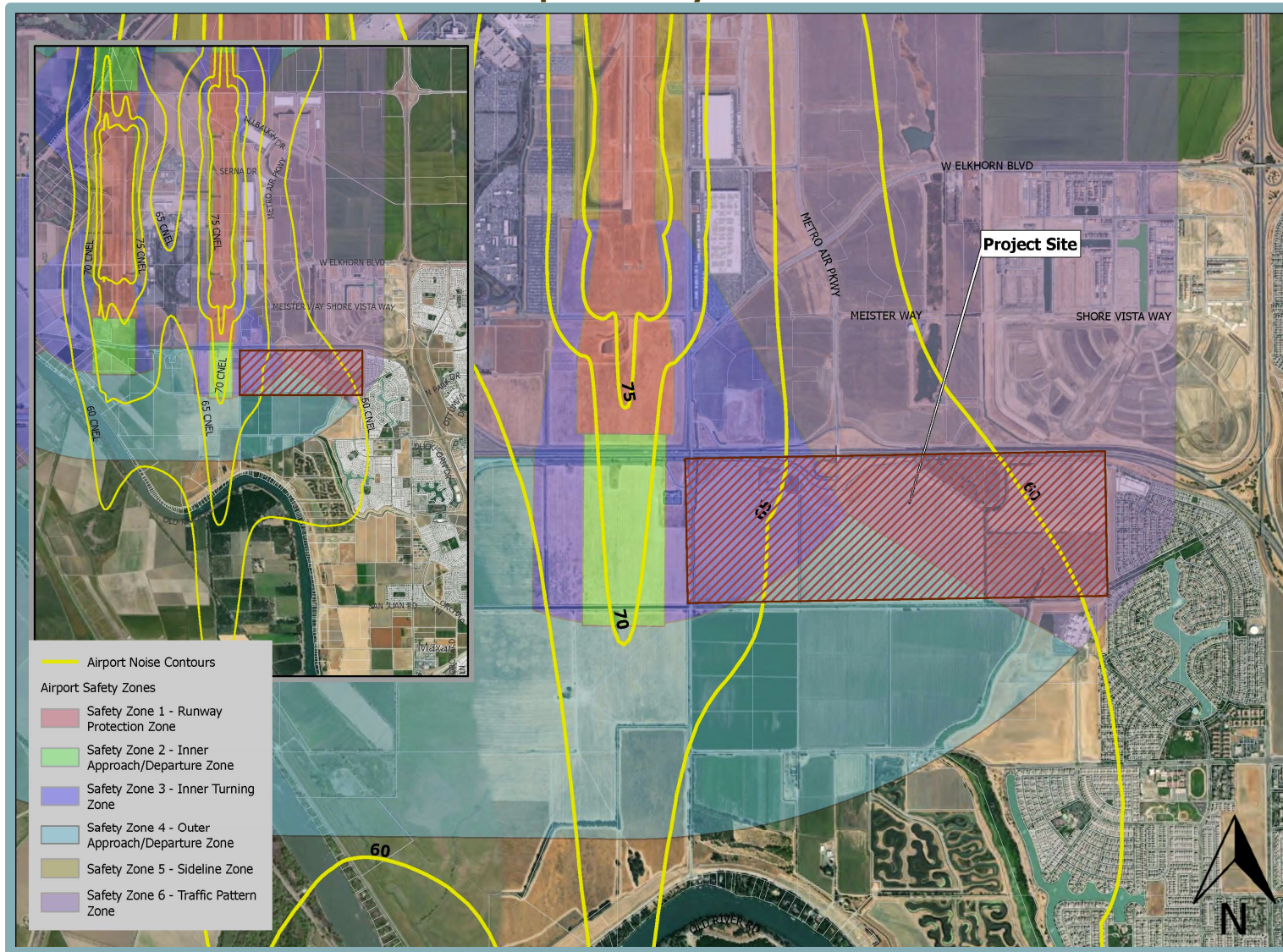
Congress passed the Occupational and Safety Health Act (29 U.S.C. Section 651 et seq. [1970]) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. OSHA requires 40 hours of training for hazardous materials operators, as well as an annual eight-hour refresher course, which includes training regarding personal safety, hazardous materials storage and handling, and emergency response.

Comprehensive Environmental Response, Compensation, and Liability Act

The CERCLA (42 U.S.C. Section 9601 et seq. [1980]) provides a federal “Superfund” to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the USEPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. The USEPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, USEPA obtains private party cleanup through orders, consent decrees, and other small party settlements.



**Figure 4.7-1
Airport Safety Zones**



The USEPA also recovers costs from financially viable individuals and companies once a response action has been completed. The USEPA is authorized to implement the CERCLA in all 50 states and U.S. territories.

Superfund Amendments and Reauthorization Act of 1986

The Superfund Amendments and Reauthorization Act (SARA) of 1986, (Title III; Section 305(a)) reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. In addition, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). SARA, Title III provides funding for training in emergency planning, preparedness, mitigation, response, and recovery capabilities associated with hazardous chemicals. Title III of SARA addresses concerns about emergency preparedness for hazardous chemicals, and emphasizes helping communities meet their responsibilities in preparing to handle chemical emergencies and increasing public knowledge and access to information on hazardous chemicals present in their communities.

Resource Conservation and Recovery Act

The RCRA (42 U.S.C. Section 6901 et seq. [1976]) gives USEPA the authority to control hazardous waste from the "cradle-to-grave," which includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled USEPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. The federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for USEPA, more stringent hazardous waste management standards, and a comprehensive UST program. States have the authority to implement individual hazardous waste programs in lieu of the RCRA as long as the state program is as stringent as federal RCRA requirements and is approved by the USEPA.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 (15 U.S.C. Section 2601 et seq. [1976]) provides USEPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon, and LBP.

U.S. Department of Transportation

Transportation of hazardous materials is regulated by the DOT's Office of Hazardous Materials Safety. The office formulates, issues, and revises hazardous materials regulations under the Federal Hazardous Materials Transportation Law. The hazardous materials regulations cover hazardous materials definitions and classifications, hazard communications, shipper and carrier operations, training and security requirements, and packaging and container specifications. The hazardous materials transportation regulations are codified in 49 CFR Parts 100–185.

The hazardous materials transportation regulations require carriers transporting hazardous materials to receive required training in the handling and transportation of hazardous materials. Training requirements include pre-trip safety inspections, use of vehicle controls and equipment



including emergency equipment, procedures for safe operation of the transport vehicle, training on the properties of the hazardous material being transported, and loading and unloading procedures. All drivers must possess a commercial driver's license as required by 49 CFR Part 383. Vehicles transporting hazardous materials must be properly placarded. In addition, the carrier is responsible for the safe unloading of hazardous materials at the site, and operators must follow specific procedures during unloading to minimize the potential for an accidental release of hazardous materials.

State Regulations

Cal-EPA and the State Water Resources Control Board (SWRCB) establish rules governing the use of hazardous materials and the management of hazardous waste. Within Cal-EPA, DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the State agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law (HWCL). The following discussion contains the applicable State laws.

Regional Water Quality Control Board

The Cal-EPA and the Office of Emergency Services (OES) establish regulations governing the use of hazardous materials in California. Within Cal-EPA, DTSC has primary regulatory responsibility for hazardous waste management. Enforcement of regulations can be delegated to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the Hazardous Waste Control Law. Along with the DTSC, the Regional Water Quality Control Board (RWQCB) is responsible for implementing regulations pertaining to management of soil and groundwater investigation and cleanup. The RWQCB's regulations are contained in Title 27 of the California Code of Regulations (CCR). The DTSC, RWQCB, and/or a local agency typically oversees investigation and cleanup of contaminated sites.

Department of Toxic Substances Control

The DTSC was established to protect California against threats to public health and degradation to the environment and to restore properties degraded by past environmental contamination. Through statutory mandates, DTSC cleans up existing contamination, regulates management of hazardous wastes, and prevents pollution by working with businesses to reduce hazardous waste and use of toxic materials in California. DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in California. In addition, DTSC's Site Mitigation and Brownfields Reuse Program oversees the cleanup of State Superfund sites. State Superfund sites are additionally known as Annual Workplan sites, listed sites, or Cortese List sites. Superfund sites demonstrate evidence of a hazardous substance release or releases that could pose a significant threat to public health and/or the environment. DTSC requires responsible parties to cleanup such sites. When responsible parties cannot be found or where they do not take proper and timely action, DTSC may use State funds to undertake the cleanup.

Cortese List

Pursuant to Government Code Section 65962.5(a), the DTSC shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all of the following:

1. All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.



2. All land designated as hazardous waste property or border zone property pursuant to former Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
3. All information received by the DTSC pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
4. All sites listed pursuant to Section 25356 of the Health and Safety Code.

California Code of Regulations

Hazardous waste is characterized and defined in CCR, Title 22, Sections 66261.20-24. Soils that meet the descriptions of the characteristics of hazardous waste defined in Sections 66261.20-24 and contain contaminants above regulatory screening levels are considered hazardous waste and must be handled and disposed of as such. The CCR includes the California Health and Safety Code.

California Health and Safety Code

The handling and storage of hazardous materials is regulated at the federal level by the USEPA under CERCLA, as amended by the SARA. Under SARA Title III, a nationwide emergency planning and response program was established that imposed reporting requirements for businesses which store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under federal laws. SARA Title III required each state to implement a comprehensive system to inform federal authorities, local agencies, and the public when a significant quantity of hazardous, acutely toxic substances are stored or handled at a facility.

Ammonia is an example of an acutely hazardous material (AHM) that is regulated by the California OES under the California Accidental Release Program (CalARP), the USEPA under the Risk Management Program (40 CFR 68), and the OSHA under the Process Safety Management Program (OSHA 1910.119). The CalARP and Risk Management Program require that all facilities that store, handle, or use AHMs above a minimum quantity, known as the threshold planning quantity, are required to develop a plan and prepare supporting documentation that summarizes the facility's potential risk to the local community and identifies safety measures to reduce potential risks to the public.

The HWCL, Chapter 6.5 of the California Health and Safety Code, is administered by the Cal-EPA to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both the State and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills.

California Vehicle Code Section 31303

The California Highway Patrol (CHP) and California Department of Transportation (Caltrans) are the enforcement agencies for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations. California Vehicle Code Section 31303 regulates the transport of hazardous materials.



Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Response to hazardous material incidents is one part of this plan. The plan is managed by the Governor's OES, which coordinates the responses of other agencies, including Cal-EPA, CHP, California Department of Fish and Wildlife, Central Valley RWQCB, and the Sacramento Fire Department.

Unified Hazardous Materials Management Regulatory Program

On January 1, 1996, Cal-EPA adopted implementing regulations and implemented a unified hazardous waste and hazardous materials management regulatory program (Unified Program), to consolidate the administration of specified statutory requirements for the regulation of hazardous wastes and materials. The Unified Program is implemented at the local level by government agencies certified by the Secretary of Cal-EPA. The Certified Unified Program Agency (CUPA) is responsible for implementation of the Unified Program. CUPA is certified and responsible for oversight of the following consolidated programs: Hazardous Materials Release Response Plans and Inventories (Business Plans); California Accidental Release Program; Underground Storage Tank Program; Aboveground Petroleum Storage Act; Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs; and California Uniform Fire Code: Hazardous Materials Management Plans and Hazardous Material Inventory Statements.

Local Regulations

The following are the local environmental laws and policies relevant to hazards and hazardous materials.

Sacramento County

The County of Sacramento OES implements the State's Right-to-Know Ordinance that gives the OES the authority to inventory hazardous materials used by businesses. The County is also in the process of collecting information regarding existing and proposed locations of hazardous material disposal, storage, handling, and transportation facilities.

Additionally, the Sacramento County Environmental Management Department (EMD) is responsible for enforcing the State regulations on both the city and county level, governing hazardous waste generators, hazardous waste storage, underground storage tanks (including inspections, enforcement, and removals), and environmental health (including inspections and enforcement). Sacramento County's Environmental Management Department has been designated as the Sacramento region's CUPA by Cal-EPA. The Program is housed within Department's Environmental Compliance Division. CUPA Programs are administered throughout the County of Sacramento and its incorporated cities, including the City of Sacramento.

EMD also regulates the use, storage, and disposal of hazardous materials in the County and abandonment of wells and septic systems in the County by issuing permits, monitoring regulatory compliance, investigating complaints, and other activities. EMD reviews technical aspects of hazardous waste site cleanups and oversees remediation of certain contaminated sites resulting from leaking underground storage tanks. EMD is also responsible for providing technical assistance to public and private entities that seek to minimize the generation of hazardous waste.



Sacramento County Area Plan

The Sacramento County EMD established the Sacramento County Area Plan (SCAP) as a guideline for hazardous material related accidents or occurrences. The purpose of the SCAP is “to delineate responsibilities and actions by various agencies in Sacramento County required to meet the obligation to protect the health and welfare of the populace, natural resources (environment), and the public and private properties involving hazardous materials.” The SCAP is used for making initial decisions at a hazardous materials incident. The SCAP uses Level I, Level II and Level III classifications for hazardous material incidents, which are determined by the following planning basis:

- Level of technical expertise required to abate the incident;
- Extent of Municipal, County, and State Government involved;
- Extent of evacuation of civilians; and
- Extent of injuries and/or deaths.

Sacramento County Multi-Hazard Disaster Plan

The Sacramento County Multi-Hazard Disaster Plan (SCMDP) was established to address a planned response to extraordinary emergency situations associated with natural disasters and technological incidents. The SCMDP focuses on operational concepts related to large-scale disasters, which can pose major threats to life and property requiring unusual emergency responses. The SCMDP was designed to include Sacramento County as part of the California Standardized Emergency Management System (SEMS), which assigns responsibilities to support implementation of the SCMDP and to ensure successful response during a major disaster.

City of Sacramento 2040 General Plan

Goals and policies from the City’s 2040 General Plan related to hazards and hazardous materials are presented below.

Environmental Justice Element

Goal EJ-1 Clean air, water, and soil with no segment of the community disproportionately burdened by environmental conditions.

Policy EJ-1.8 **Site Contamination.** The City shall ensure buildings and sites are or have been investigated for the presence of hazardous materials and/or waste contamination before development, where applicable. The City shall continue to require remediation and construction techniques for adequate protection of construction workers, future occupants, adjacent residents, and the environment, and ensure they are adequately protected from hazards associated with contamination.

Public Facility and Safety

Goal PFS-2 Effective emergency preparedness for and response to natural and human-made hazards.

Policy PFS-2.1 **Hazard Mitigation Planning.** The City shall continue to use the Local Hazard Mitigation Plan, Comprehensive Floodplain



Management Plan, Emergency Operations Plan, and Operational Area Plan to guide actions and investments addressing disasters such as flooding, dam or levee failure, hazardous material spills, epidemics, fires, extreme weather, major transportation accidents, earthquakes, and terrorism.

Airport Land Use Commission

The Sacramento Area Council of Governments (SACOG) Board of Directors serves as the Airport Land Use Commission (ALUC) for Sacramento, Sutter, Yolo, and Yuba counties. The State Aeronautics Act (Public Utilities Code Sections 21670 et seq.) identifies the role and responsibilities of ALUCs in land use planning. The Act is intended to ensure that proposed land uses in areas around public-use airports are compatible with continued airport operations.

Sacramento International Airport Land Use Compatibility Plan

One of the ALUC's primary functions is to develop and adopt an ALUCP for each public-use airport within its jurisdiction. The ALUCP includes land use policies focused on four compatibility factors: safety, noise, airspace, and overflight. The Sacramento International ALUCP was adopted in December 2013.

The basic function of the Sacramento International ALUCP is to promote compatibility between Sacramento International Airport and the surrounding land uses. The ALUCP establishes a set of compatibility criteria applicable to new development located within the Airport Influence Area established by the ALUCP. The ALUCP establishes zones regarding noise compatibility, safety compatibility, airspace protected, and overflight compatibility, and establishes criteria for land uses in each zone.

4.7.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to hazards and hazardous materials. A discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

In accordance with CEQA Guidelines Appendix G, an impact is considered significant if the proposed project would:

- Create a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;



- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (see Chapter 5, Effects Not Found to be Significant); and/or
- Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires (see Chapter 5, Effects Not Found to be Significant).

As noted above, issues related to whether the proposed project would result in the following are discussed in Chapter 5, Effects Not Found to be Significant, of this EIR:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires.

Method of Analysis

Site conditions and impacts for this chapter are based primarily on the Phase I ESA prepared for the project site. The goal of a Phase I ESA is to identify whether RECs exist at a property, where RECs are defined by ASTM as “the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. [...]” The Phase I ESA meets or exceeds the requirements of the ASTM “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-05.”

The Phase I ESA included a review of federal, State, and local environmental databases for information regarding documented and suspected releases of regulated materials within the project site vicinity based upon reference to an environmental database search performed by EDR, an environmental database search firm. Additional historical use information regarding the project site and surrounding properties was pulled from the following sources:

- Aerial photographs;
- Fire insurance (Sanborn) maps;
- Building department records;
- Chain-of-title documents;
- City directory abstracts;
- Land use records; and
- U.S. Geological Survey (USGS) Topographic Maps.

Historical photographs of the project site dating to 1937 and historic topographic maps dating to 1907 were reviewed to provide a historical context of the project site. In addition, a site reconnaissance of the project site was conducted on September 2, 2022. The site reconnaissance consisted of walking the project site and driving by nearby adjacent properties from public vantages to observe apparent uses. Photographs of the site were taken during the site reconnaissance.



Additional information within this chapter was sourced from the City of Sacramento 2040 General Plan,⁶ and the General Plan MEIR.⁷ Determinations of significance are made in this chapter based on existing and potentially occurring hazards and hazardous materials within the project area, and the potential impacts posed by such hazards to the public or the environment.

Project-Specific Impacts and Mitigation Measures

The project site conditions have been compared to the standards of significance presented above in order to determine the project's impact significance. If significant impacts are identified for the construction and operational phases of the proposed project, recommended mitigation measures have been included to reduce the identified impacts to less-than-significant levels.

4.7-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Based on the analysis below, the impact is *less than significant*.

Given that development of both the industrial park and nonparticipating parcels would result in similar land uses, the following discussion applies to the potential for both project components to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The proposed project would include a total of approximately 5,204,500 square feet (sf) of industrial uses within the industrial park footprint, as well as approximately 1,404,800 sf of future industrial uses within the nonparticipating parcels. While the future tenants of the proposed industrial buildings are not currently known, a large segment of the current retail market consists of regional suppliers, such as Amazon and Walmart, that deliver goods directly to consumers. As such, a need exists for light industrial warehousing to act as fulfillment centers for regional retailers. Operations associated with the proposed project would be typical of other warehouses in the City, and would be governed by the uses permitted for the site per the City's Municipal Code and 2040 General Plan, as well as the Development Agreement and Planned Unit Development (PUD) established for the project site.

While not currently anticipated, in the event that future operations associated with the proposed warehouses involve the routine use, transport, or disposal of hazardous materials, such materials would be safely managed in accordance with applicable regulations and would be subject to City review depending on the type or quantity of chemicals proposed for use. Chapter 8.64 of the City's Municipal Code requires that any use of hazardous materials be disclosed to the City's fire department. In addition, Chapter 8.60 of the City's Municipal Code includes regulations regarding hazardous materials cleanup, in the event that any hazardous substance or waste is unlawfully

⁶ City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

⁷ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



released, discharged, deposited, or abandoned upon or into any property, water, or facilities within the City.

The proposed project would also include six lots comprised of retail/highway commercial uses. While the future commercial uses of the retail/highway commercial parcels are not currently known, the majority of commercial land uses are not typically associated with the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. Maintenance and operation of the proposed uses may use common cleaning products, fertilizers, and herbicides on-site, any of which could contain potentially hazardous chemicals; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the amount anticipated to be used on the site, routine use of such products would not represent a substantial risk to public health or the environment.

It should be noted that the project seeks a Conditional Use Permit (CUP) to allow fueling station services to be included in the highway commercial uses, which would involve the routine transport and use of gasoline and diesel fuels. Fuel would be stored on-site in USTs, which would dispense fuels through fuel dispensers. In addition, storage and selling of automotive fluids could occur associated with a potential convenience store at the future fueling station uses. Nonetheless, fuel pump dispensers at the fueling station would be required to be equipped with automatic shutoffs and other safety devices and signage as required by applicable fire, building, and health codes. In accordance with CCR, Title 23, Section 2635(b), USTs would be required to have spill containment and overfill prevention systems.

In addition, any proposed fueling station use on-site would be subject to regulations by the Sacramento County EMD, which is the CUPA for the City. The Unified Program is a statewide program overseen by the Cal-EPA that delegates the responsibility of applying regulatory standards established by State agencies to local agencies through inspections, permitting, and enforcement activities. The Unified Program encompasses regulatory standards from the OES, DTSC, Office of the State Fire Marshal (OSFM), the SWRCB, and Cal-EPA. Pursuant to the requirements established by Sacramento County EMD as the CUPA, on-site fueling station uses would be required to prepare a Hazardous Materials Business Plan (HMP) to ensure impacts related to the proposed USTs would not occur. The HMP is required for businesses with hazardous materials on-site and must detail the quantity of such materials stored on the premises, spill prevention and control measures, and an emergency response plan to address potential incidents related to such materials including a release, fire, and/or disaster. In addition, underground storage of hazardous materials is subject to the provisions of CCR, Title 23, and the transport of fuels to the project site would be required to adhere to the Hazardous Materials Regulations stipulated in the Code of Federal Regulations, Title 49, Parts 100-185, which regulate the transportation of hazardous material and hazardous waste.

With respect to the proposed off-site force main, the new sewer infrastructure would be designed and constructed in accordance with the applicable standards set forth in the SacSewer Standards and Specifications. Compliance with the aforementioned standards would ensure the off-site force main is constructed in conformance with proper materials and sizing. Thus, operation of the off-site force main would not create



a significant hazard to the public or the environment through the routine conveyance of wastewater flows.

Construction activities associated with development of the industrial park and off-site force main, as well as construction activities associated with future buildout of the nonparticipating parcels, would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. The project contractor is required to comply with all California Health and Safety Codes and local County ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Pursuant to California Health and Safety Code Section 25510(a), except as provided in subdivision (b),⁸ the handler or an employee, authorized representative, agent, or designee of a handler, shall, upon discovery, immediately report any release or threatened release of a hazardous material to the unified program agency (in the case of the proposed project, the Sacramento County EMD) in accordance with the regulations adopted pursuant to Section 25510(a). The handler or an employee, authorized representative, agent, or designee of the handler shall provide all State, city, or county fire or public health or safety personnel and emergency response personnel with access to the handler's facilities. In the case of the proposed project, the contractors are required to notify the Sacramento County EMD in the event of an accidental release of a hazardous material, who would then monitor the conditions and recommend appropriate remediation measures.

Based on the above, the project would not create a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous materials. Thus, a *less-than-significant* impact would occur.

Mitigation Measure(s)

None required.

4.7-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The Phase I ESA prepared for the proposed project by EIS included an analysis of potential RECs within the industrial park and nonparticipating parcels. Therefore, the following discussion applies to the potential for both project components to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. Because installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway right-of-way (ROW) or in other previously disturbed, paved areas,

⁸ Subdivision (a) does not apply to a person engaged in the transportation of a hazardous material on a highway that is subject to, and in compliance with, the requirements of Sections 2453 and 23112.5 of the Vehicle Code.



construction of the force main would not be anticipated to disturb areas containing existing RECs.

Industrial Park and Nonparticipating Parcels

As discussed previously, the Phase I ESA did not identify any RECs associated with PCB containing equipment on-site, the aboveground storage tanks, or the small quantities of solid waste identified on-site during site reconnaissance. In addition, the Phase I ESA did not identify use of rodenticides as a potential REC. Therefore, the following includes a discussion of the remaining environmental conditions associated with the project site, including the potential presence of residual pesticides, on-site soil stockpiles of unknown origin, and the potential presence of residual ACBMs and LBP.

Pesticides

As discussed above, the project site was historically used as hay fields, with possible intermittent rice fields from 1937 until at least 2020. Therefore, the potential exists for OCPs to be present in on-site soils. The Phase I ESA noted that residual agricultural chemicals typically are not present at concentrations that would influence off-site disposal of soil or pose a health risk to commercial site users when the land use is limited to rice fields and hay fields, and, thus, determined that the presence of OCPs would not be considered an REC. However, soil sampling has not been conducted on-site to determine whether residual OCPs are present within on-site soils. If such materials are present in on-site soils, a potential health hazard could occur during project construction. Therefore, in an abundance of caution, the Phase I ESA recommended that shallow soils on-site be tested for residual pesticides prior to development of the proposed project.

Stockpiled Soils

While hazardous materials, as well as odors, surface staining, stressed vegetation, or other obvious evidence of the presence of hazardous materials, were not observed in association with the on-site stockpiled soils, due to the lack of documentation associated with the source of the stockpiled soils, the potential exists that the soil stockpile may be contaminated, or hazardous materials may be present. As such, the Phase I ESA determined that the soil stockpiles on the project site represent a potential environmental concern, and recommended that the soil stockpile be sampled prior to any redevelopment of Parcel 1 and/or Parcel 6A, as the stockpiles are located in within the general vicinity of such parcels.

Asbestos-Containing Building Materials and Lead-Based Paint

According to the Phase I ESA, buildings were located within the project site prior to 1937. Therefore, while the structures have been removed from the site, residual ACBM and LBP may be present within the areas of former structures. The potential presence ACBMs and lead contamination is considered an REC. During demolition and ground-disturbing activities associated with the proposed project, construction workers could come into contact with, and be exposed to, ACBMs or LBP materials present in the on-site soils associated with the former structures. Additionally, workers could potentially be exposed to elevated concentrations of lead in the soil in the vicinity of the structures. Collection and disposal of ACBMs and lead materials, including LBP, by untrained personnel could cause asbestos and lead dust emissions to be



transported off-site, resulting in the release of hazardous material into the environment. Thus, a significant impact could occur.

Conclusion

Based on the above, evidence of RECs, controlled RECs or historical RECs was not identified in connection with the project site. However, development of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, particularly regarding contaminated soils associated with residual OCPs, the existing on-site soil stockpiles, and/or ACBM and LBP. Therefore, a **significant** impact could occur.

Mitigation Measure(s)

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

4.7-2(a) *Prior to approval of grading permits, a surficial soil sample laboratory analysis shall be conducted on the project site. Once the soils are collected, the soils shall be tested for OCPs, lead, and asbestos. If soil contaminants are not found, further action is not required; however, if OCPs, lead, or asbestos is found to be higher than the allowable thresholds, the assessment shall include the appropriate mitigation including, but not limited to, soil remediation to an acceptable total threshold limit concentration (TTL) level per applicable State and federal regulations by excavation of the contaminated soil, and subsequent transportation and disposal off-site at an appropriate Class I or Class II facility permitted by DTSC; or by properly capping the contaminated soil, in compliance with DTSC regulations (e.g., placing soils underneath project roadways, etc.). All recommended mitigation measures shall be implemented by the project applicant, subject to review and approval by the City of Sacramento Community Development Department.*

4.7-2(b) *Prior to approval of grading permits for Parcel 1 and/or Parcel 6A, samples of the soil stockpiles on-site shall be obtained for analysis of contaminants of concern and comparison with applicable regulatory screening levels (i.e., Environmental Screening Levels, California Human Health Screening Levels, Regional Screening Levels, etc.). If soil contaminants are not found, further action is not required. However, where the soil contaminant concentrations exceed the applicable regulatory screening levels, the impacted soil shall be excavated and disposed of off-site at a licensed landfill facility to the satisfaction of the City of Sacramento Community Development Department.*

4.7-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Based on the analysis below, the impact is *less than significant*.



As the footprints of the proposed industrial park and nonparticipating parcels are contiguous, and the proposed uses for both project components are similar, the potential for either project component to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be the same. Thus, the following discussion applies to both project components. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The project site is located approximately 200 feet northwest of Paso Verde K-8 School. Therefore, the proposed project would be located within 0.25-mile of an existing school. However, as discussed under Impact 4.7-1, while the future tenants of the proposed industrial buildings are not currently known, a large segment of the current retail market consists of regional suppliers, such as Amazon and Walmart, that deliver goods directly to consumers. As such, a need exists for light industrial warehousing to act as fulfillment centers for regional retailers. Operations associated with the proposed project would be typical of other warehouses in the City, and would be governed by the uses permitted for the site per the City's Municipal Code and 2040 General Plan, as well as the Development Agreement and PUD established for the project site. In addition, the off-site force main would be installed underground and would be designed and constructed in accordance with the applicable standards set forth in the SacSewer Standards and Specifications, ensuring the force main is constructed in conformance with proper materials and sizing.

Therefore, while not currently anticipated, in the event that future operations associated with the proposed warehouses involve the routine use, transport, or disposal of hazardous materials, such materials would be safely managed in accordance with applicable regulations and would be subject to City review depending on the type or quantity of chemicals proposed for use. In addition, during construction activities, the project contractor is required to comply with all California Health and Safety Codes and local County ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Furthermore, as discussed under Impact 4.7-2, evidence of RECs, controlled RECs or historical RECs was not identified in connection with the project site, and Mitigation Measures 4.7-2(a) and 4.7-2(b) would ensure that hazardous conditions associated with residual OCPs, existing soil stockpiles, and/or ACBM and LBP on-site do not occur.

Based on the above information, while the project site is located within 0.25-mile of Paso Verde K-8 School, the proposed project would not result in substantial adverse effects related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste. Therefore, the project would result in a **less-than-significant** impact.

Mitigation Measure(s)

None required.

4.7-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code



Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. Based on the analysis below, the impact is *less than significant*.

As the footprints of the proposed industrial park and nonparticipating parcels are contiguous, the potential for either project component to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be similar. Thus, the following discussion applies to both project components. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The Cal-EPA has compiled a list of data resources that provide information regarding the facilities or sites identified as meeting the “Cortese List” requirements, pursuant to Government Code 65962.5. The components of the Cortese List include the DTSC Hazardous Waste and Substances Site List,⁹ the list of leaking UST sites from the SWRCB’s GeoTracker database,¹⁰ the list of solid waste disposal sites identified by the SWRCB,¹¹ and the list of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB.¹² The project site and off-site force main alignment are not included on any of the aforementioned data resources. Therefore, the proposed project would not create a significant hazard to the public or the environment related to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would result in a ***less-than-significant*** impact.

Mitigation Measure(s)

None required.

4.7-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area. Based on the analysis below, with implementation of mitigation, the impact is *less than significant*.

As the footprints of the proposed industrial park and nonparticipating parcels are contiguous, the potential for either project component to be located within an airport land use plan or within two miles of a public airport or public use airport would be

⁹ Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese)*. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed October 2022.

¹⁰ State Water Resources Control Board. GeoTracker. Available at: <https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=5340390861>. Accessed October 2022.

¹¹ Cal-EPA. *Cortese List Data Resources*. Available at: <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed October 2022.

¹² *Ibid.*



similar. Thus, the following discussion applies to both project components. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The nearest public airport to the project site is the Sacramento International Airport, located approximately one mile to the northwest. As a result, the project site is located within the Airport Influence Area. A discussion of noise-related impacts associated with the project site being located within the Sacramento International Airport Influence Area is provided in Chapter 4.10, Noise, of this EIR. Therefore, the following discussion is focused on whether the proposed project would result in a safety hazard associated with the Sacramento International Airport for people working in the project area.

As discussed above, and presented in Figure 4.7-1, according to the Sacramento International ALUCP, the western portion of the project site is located within Safety Zone 3, which is designated “Inner Turning Zone”, the south-central portion of the site is located within Safety Zone 4, which is designated “Outer Approach/Departure Zone”, and the eastern portion of the project site is located within Safety Zone 6, which is designated “Traffic Pattern Zone.”

As shown in Table 2 of the ALUCP, all of the uses proposed to be developed on the project site and off-site force main alignment as part of the project, including short-term lodging (i.e., hotels, motels, other transient lodging); commercial, office, and service uses; and industrial, manufacturing, and storage uses (with the exception of hazardous materials production uses, such as oil refineries and chemical plants, which are not anticipated to be developed on-site) are normally compatible, or conditionally compatible uses within Zones 3, 4, and 6. Table 2 of the ALUCP provides criteria for conditionally compatible uses within each Safety Zone to ensure the uses are compatible with the Sacramento International Airport. The intent of land use safety compatibility criteria is to minimize the risks associated with an off-airport aircraft accident or emergency landing, and the criteria focus on reducing the potential consequences of such events should they occur.

While the future tenants of the proposed industrial buildings, or the future commercial uses of the retail/highway commercial parcels, are not currently known, all future uses would be required to comply with the criteria for conditional uses, as shown in Table 2 of the ALUCP, to ensure safety compatibility with the Sacramento International Airport.

The ALUCP also includes airspace protection compatibility policies, which seek to prevent creation of land use features that can pose hazards to the airspace required by aircraft in flight and have the potential for causing an aircraft accident. The Sacramento International ALUCP does not support any land uses that could attract large numbers of birds, recognizing birds as a potential hazard to aircraft. In addition to damage resulting from high-speed collisions with birds, the ingestion of birds into aircraft engines is a hazard. Damage caused by birds and other wildlife is termed a “strike” or “strike hazard.”



Federal Aviation Administration (FAA) data indicates that aircrafts using the Sacramento International Airport have experienced a high incidence of bird strikes compared to other airports nationwide. To reduce strike hazards, the ALUCP has placed restrictions on the land uses in the influence area of Sacramento International Airport. The ALUCP states that any uses that attract large flocks of birds shall not be permitted within the Airport Influence Area.

The project site was historically used as hay fields, with possible intermittent use as rice fields from 1937 until at least 2020. As such, the project site, in its historical context, has occasionally been an attractant to birds and other waterfowl, which would have increased the hazard potential to aircraft compared with other, non-rice farmed/urban areas located within the Sacramento International Airport's safety overflight zone. The proposed project would result in the development of the site with industrial and commercial uses, which are not typically uses that would attract birds and other wildlife. While the proposed project would include the development of stormwater retention features (see Chapter 4.8, Hydrology and Water Quality, of this EIR for further detail), which could periodically result in standing water being present within the project site, permanent water features would not be included in the project design.

The proposed project is located within the 10,000-foot FAA Separation Area for Wildlife Attractants, as shown in Map 5 of the ALUCP. Therefore, the proposed project would be required to comply with ALUCP Policy 3.4.3, which would require that the proposed project document consideration of current FAA or other federal regulations and guidelines pertaining to hazardous wildlife attractants. Because the final design of the stormwater retention features has not yet been determined, the proposed project could introduce stormwater drainage features on the project site that could attract birds to the site. Thus, the proposed project has the potential to result in airspace safety hazards from birds.

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

Mitigation Measure(s)

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

- 4.7-5(a) *To ensure that the final location and design of the detention basins are consistent with the recommendations of the Airport Land Use Commission (ALUC) regarding wildlife hazards to aviation, the project applicant shall prepare a design and management plan for this proposed drainage feature. This plan shall be prepared in coordination with the Sacramento International Airport Operations Manager before commencement of construction. The plan shall determine an appropriate size and location for the detention basins and incorporate specific design measures deemed sufficient by Sacramento County Airport System (SCAS) and the ALUC to minimize bird strikes and other*



wildlife-related airspace safety hazards in the vicinity of the project area. The plan shall include information sufficient to satisfy requirements for preparation of a Wildlife Hazard Management Plan and shall be prepared by a qualified wildlife hazard damage biologist. The project applicant shall submit a detailed design drawing of the proposed detention basins to SCAS for review.

To reduce bird attractants associated with the detention basins, the Wildlife Hazards Management Plan for the detention basins and surrounding landscape shall include the following:

- Any vegetation planted in the vicinity of the detention basins shall consist of plant species that do not provide birds with opportunities for cover, nesting, perching, or feeding. A detailed design plan for landscaping surrounding the detention basins shall be submitted to SCAS for view;
- Signs shall be placed at regular intervals around the perimeter of the detention basins prohibiting the public from feeding any wildlife. The project applicant, and any subsequent property owner shall maintain such signs in good order and replace such signs as necessary. This responsibility shall transfer to the Property Management Association and shall be articulated in the covenants, conditions, and restrictions (CC&Rs);
- The CC&Rs shall specify that the project proponent and project applicant shall be responsible for ensuring trash receptacles with covers are provided and properly emptied on a regular basis and replaced as needed;
- Installation of structures near the detention basins that could serve as perches for gulls and other birds shall be minimized. The CC&Rs, or other mechanism, shall prohibit the future installation of such structures.
- The project applicant shall prohibit all activities and uses that could conflict with implementation of the wildlife hazard management program.

An Adaptive Management Plan shall be prepared and incorporated into the Wildlife Hazard Management Plan. The Adaptive Management Plan shall provide for the long-term management of nuisance birds around the detention basins. The management plan shall involve monitoring and employment of various techniques for controlling birds using adaptive information and bird control products. The Property Management Association, or if none exists, the property owner shall be responsible for ensuring the implementation and continued enforcement of the Adaptive Management Plan and provision of adequate funding. This requirement shall be specified in the CC&Rs or other mechanism. The Adaptive Management Plan shall include the following components:



- *Bird control program that involves use of the most efficient and effective bird control techniques available that are practicable and compatible with surrounding land uses.,*
- *Monitoring program that involves patrolling of the detention basins and assessment of the effectiveness of bird control measures, the presence of potential bird attractants, and the need for modifying or increasing bird control measures,*
- *Funding mechanism such as use of an endowment fund or assessment district to fund the long-term monitoring and adaptive management program.*
- *Any use of the detention basins that conflicts with the wildlife control program shall be prohibited.*
- *The Adaptive Management Plan shall include the best available information on various bird control techniques, an explanation of the situations in which various techniques are best employed, and instructions for implementing such techniques. The entity responsible for implementing the management plan shall employ a qualified and experienced Wildlife Damage Biologist/Manager (Manager) who shall be responsible for determining which bird control techniques to implement based on information provided in the management plan and the best scientific and commercial information available. The Manager shall be trained in bird control techniques by the U.S. Department of Agriculture-Wildlife Services (USDA). The initial cost of such training shall be borne by the project applicant. The cost of subsequent training shall be borne by the Property Management Association. The Manager shall have the discretion to use new technologies or information regarding bird control provided they are practicable and within the management budget, and do not conflict with surrounding land uses or storm water control functions of the detention basins.*

The monitoring and maintenance portion of the Adaptive Management Plan shall include the following:

- *Patrol to ensure the detention basin areas are kept clean and free of refuse and other such material that may attract birds;*
- *Patrol to ensure the public is abiding by rules prohibiting feeding of birds;*
- *Control of vegetative growth around the detention basins to minimize any vegetation that would attract birds for purpose of cover, nesting, perching, or food;*
- *Remove all nesting material prior to completion of nest if any birds attempt to nest in areas surrounding the detention basins. All nest removal activities must comply with provisions of the Migratory Bird Treaty Act, the California Endangered Species Act, and the federal Endangered Species Act;*



- *Inspect the detention basin areas to determine whether additional measures are needed to reduce bird use of the detention basins; and*
- *Aggressively haze wildlife to discourage use of the basins.*

If monitoring efforts reveal that additional control efforts are necessary, the Bird Control Program Manager may implement one or more control techniques outlined in the Adaptive Management Plan, or other techniques based on best available scientific and commercial information. Bird control techniques currently being used at airports, on agricultural lands, and in other areas where birds pose a hazard or nuisance shall be described in the Adaptive Management Plan. The Bird Control Program Manager shall have discretion of using any one or more of the techniques based on the need, practicability, and land use compatibility. These techniques may include, but are not limited to, allowing grass to grow over 8 inches in height (currently being employed at some airports).

In addition to these control techniques, the Adaptive Management Plan shall outline an education program for the Property Management Association to implement ensuring that the public is aware of the importance of eliminating bird attractants from the area around the lake. The public shall be prohibitive from feeding birds around the detention basins and engaging in any other activities within the boundaries of the development project which may attract wildlife hazards to aircraft operations. The public shall be made aware of the purpose and importance of various bird control measures being implemented by the Bird Control Program Manager.

All activities and uses of the detention basins that may conflict with the wildlife control program shall be expressly prohibited.

If the SCAS determines that conditions in the Airport South Industrial Project Development are not consistent with the above listed Management Program, SCAS may take the following actions:

- *Notify the property owner that the wildlife control measures are out of compliance;*
- *County Airport System may, at its option, initiate control measures at the site, with the costs of such measures billed to the owner; and*
- *In the event of an immediate threat to aircraft safety, County Airport System personnel can take immediate action to remedy the air hazard emergency.*

To reduce attractants for Canada geese, American coots, or gulls associated with the detention basins and surrounding landscape the Management Plan shall include the following:



- Signs shall be posted and identify that feeding birds is prohibited.
- Any nest building activity associated with birds shall be removed including all nesting materials.
- To prevent the establishment of resident populations of Canada geese on the project site, the Bird Control Program Manager shall take the following, but not limited to, actions:
 - Chase birds from site,
 - Use of noise generators (e.g., pyrotechnic devices, blank cartridges),
 - Use of visual devices (e.g., flags, scarecrows, water sprays)
 - Use of chase dogs,
 - Live trapping or netting, and/or
 - Use of chemical repellants.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

For further detail related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections, of this EIR.

4.7-6 Cumulative exposure to potential hazards and increases in the transport, storage, and use of hazardous materials. Based on the analysis below, the cumulative impact is *less than significant*.

As discussed, project-specific impacts associated with hazardous materials related to implementation of the proposed project were found to be less than significant with implementation of mitigation. Hazardous materials and other public health and safety issues are generally site-specific and/or project-specific and would not be significantly affected by other development within the project area. Cumulative development projects would be subject to the same federal, State, and local hazardous materials management requirements as would the proposed project, which would minimize potential risks associated with increased hazardous materials use in the community. Therefore, cumulative impacts associated with hazardous materials transport, storage, and use associated with implementation of past, present, and reasonably foreseeable future projects, as well as the proposed project, would be ***less than significant***.

Mitigation Measure(s)

None required.



4.8 HYDROLOGY AND WATER QUALITY

4.8 HYDROLOGY AND WATER QUALITY

4.8.1 INTRODUCTION

The Hydrology and Water Quality chapter of the EIR describes existing drainage patterns on the project site, current stormwater flows, and stormwater infrastructure. The chapter also evaluates potential impacts of the proposed project with respect to increases in impervious surface area and associated stormwater flows, degradation of water quality, and increases in on- and off-site flooding. Information used for this chapter was primarily drawn from the Preliminary Drainage Study prepared for the proposed project by Wood Rodgers (see Appendix I),¹ as well as the City of Sacramento 2040 General Plan,² and the City of Sacramento 2040 Master EIR (MEIR).³

It should be noted that issues associated with water supply and availability are addressed in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR. In addition, as discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

4.8.2 EXISTING ENVIRONMENTAL SETTING

The section below describes regional hydrology, the existing drainage patterns within the project site, including peak flows, existing water quality, and groundwater conditions.

Regional Hydrology

The project site is located within the Natomas Basin. The Natomas Basin comprises approximately 50,000 acres spanning northwestern Sacramento County and southwestern Sutter County, and is protected by a levee system under the jurisdiction of the United States Army Corps of Engineers (USACE). The levees surrounding the Natomas Basin were decertified by the USACE in December 2008. After that date, the Sacramento Area Flood Control Agency (SAFCA), the USACE, and the State of California have been, and currently are, working together to fund, design and construct levee improvements to provide 200-year protection to the Natomas Basin. Over 50 percent of the levee improvements have been constructed, and 100 percent of the funding has been allocated by local, State, and federal agencies to complete all of the levee improvements.

¹ Wood Rodgers. *Airport South Industrial Preliminary Drainage Study*. October 11, 2023.

² City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

³ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



The City of Sacramento is divided into approximately 120 drainage basins. Drainage from most of the basins flows to local rivers or creeks or drainage channels through pumping. The City owns and operates 105 storm drainage pumping stations throughout the City. The drainage canals and local creeks eventually drain into the Sacramento and American Rivers.

In the vicinity of the project site, Reclamation District (RD) 1000 owns and operates the existing canals and pumping plants that move storm drainage from the local area to the Sacramento River. RD 1000 collects all runoff within the Natomas Basin through a system of interconnected channels and directs this runoff to pumping plants in order to lift the water into the leveed rivers and channels surrounding Natomas.

Project Site and Surrounding Area Drainage

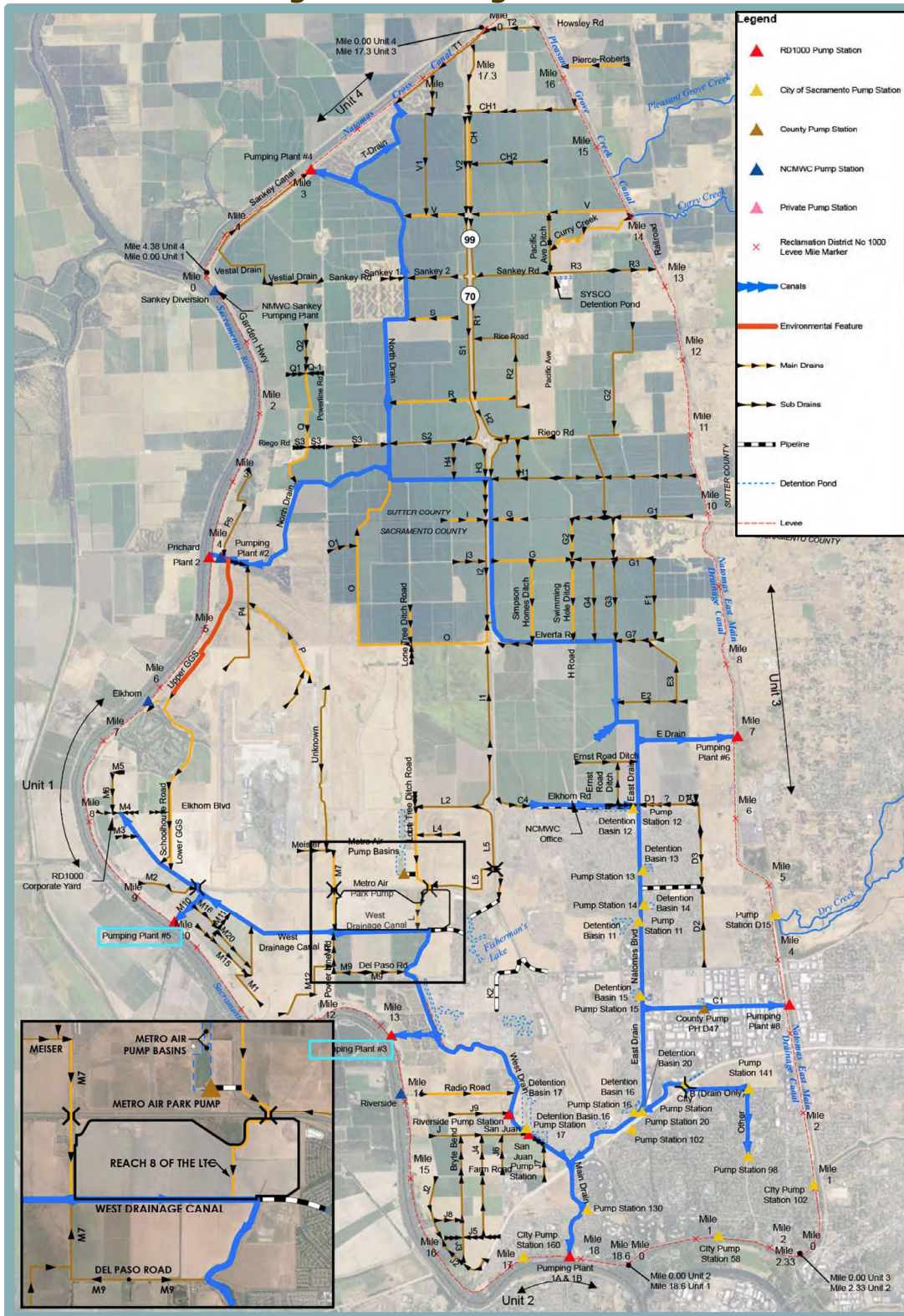
Currently, the 474.4-acre project site consists entirely of undeveloped agricultural land. The site is bound to the north by Interstate 5 (I-5) and to the east by the City of Sacramento (City). A portion of Bayou Way is located within the project site and is generally laid out in an east-to-west direction. Surrounding existing land uses include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west, proposed to be developed for the Watt EV Project; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

The existing regional drainage facilities are shown in Figure 4.8-1. Off-site runoff within the project vicinity enters the project site along the RD 1000 L Drain of the Lone Tree Canal that flows south through three eight-foot by five-foot box culverts under I-5 (directly north of the project site). Within the project site, the RD 1000 L Drain of the Lone Tree Canal bisects the easterly third of the site from the remainder of the site. The RD 1000 L Drain flows south to join the West Drainage Canal that is located along the southern boundary of the project site. At the confluence of the Lone Tree Canal and the West Drainage Canal, drainage runoff either flows east and south toward Pumping Plant 3 on the Sacramento River, or west and northwest toward Pumping Plant 5 on the Sacramento River. It should be noted that the RD 1000 system in the Lone Tree Canal and West Drainage Canal is operated with a permanent backwater condition whereby the canals contain water at all times of the year. Other than the existing RD 1000 ditches and canals discussed above, the project site does not contain internal drainage system facilities. Peak flows within the West Drainage Canal downstream of the RD 1000 L Drain and West Drainage Canal confluence are currently 465.5 cubic feet per second (cfs). Water surface elevations within the connecting channel just upstream of Pumping Plant 3 are currently 13.789 feet and water surface elevations within the channel upstream of Pumping Plant 5 are currently 14.589 feet.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the project area, the entirety of the project site is located within Zone A, which is designated as a Special Flood Hazard Area (SFHA) (see Figure 4.8-2). However, it should be noted that due to the levee improvements described above, portions of the Natomas Basin are now classified as A-99 flood zones, including the eastern portion of the project site. A-99 is an interim designation that allows new development to proceed without elevation verification while the improvements needed to provide 100-year protection are under construction. However, the A-99 flood zone is still a SFHA until construction of the levees is complete, and the levees are certified by FEMA.



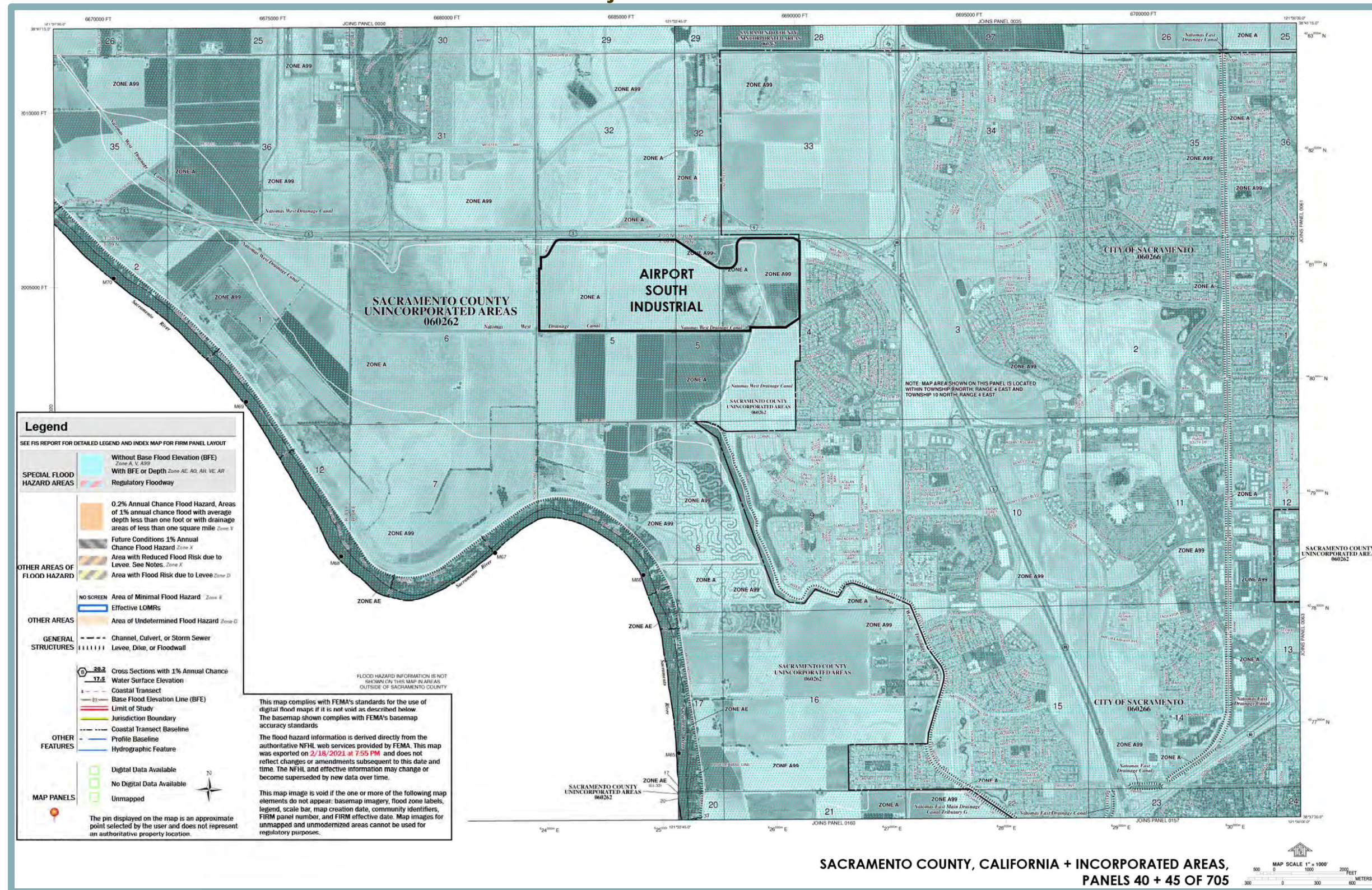
**Figure 4.8-1
 Regional Drainage Facilities**



Source: Wood Rodgers, 2023.



Figure 4.8-2
 Project Area FEMA FIRM



Future development of the proposed project would likely require a Conditional Letter of Map Revision (CLOMR) and a subsequent Letter of Map Revision (LOMR) to remove floodplain designations which inhibit development. The Zone A floodplain would be modified using the RD1000 modeling for interior drainage, prior to the A-99 designation being removed after all levee improvements are constructed.

Water Quality

Activities and/or conditions that have the potential to degrade water quality include but are not limited to, construction activities and urban stormwater runoff.

Construction activities have the potential to cause erosion and sedimentation associated with groundbreaking and clearing activities, which could cause unstabilized soil to be washed or wind-blown into nearby surface water. In addition, the use of heavy equipment during construction activities, especially during rainfall events, have the potential to cause petroleum products and other pollutants to enter nearby drainages.

Water quality degradation from urban stormwater runoff is primarily the result of runoff carrying pollutants from the land surface (i.e., streets, parking lots, etc.) to the receiving waters (i.e., streams and lakes).

Pollutants typically found in urban runoff include facility maintenance and lawn-care/landscaping chemicals (insecticides, herbicides, fungicides and rodenticides), heavy metals (such as copper, zinc and cadmium), oils and greases from automobiles and other mechanical equipment, and nutrients (nitrogen and phosphorus).

The Phase I Environmental Site Assessment (ESA)⁴ prepared for the proposed project determined that contamination of on-site soils is considered a recognized environmental condition (REC). Nonetheless, as discussed in Chapter 4.7, Hazards and Hazardous Materials, of this EIR, implementation of mitigation would ensure that potential impacts associated with contamination of on-site soils, and associated water quality impacts, would be less than significant.

Groundwater

The project site is located within the Sacramento Valley – North American Subbasin. The North American Subbasin encompasses an area of about 535 square miles in portions of Placer, Sacramento, and Sutter counties, and is bounded on the north by the Bear River, on the south by the American River, to the west by the Feather and Sacramento rivers, and on the east by the Sierra Nevada foothills. The Subbasin is managed by five Groundwater Sustainability Agencies (GSAs), which include Reclamation District 1001 (RD 1001), the Sacramento Groundwater Authority (SGA), South Sutter Water District, Sutter County, and West Placer.

Groundwater in the portion of the North American Subbasin within which the project site is located is managed by the Sacramento Central Groundwater Authority (SCGA).⁵ The SCGA was formed in 2006 through a joint powers agreement signed by the cities of Elk Grove, Folsom, Rancho Cordova, and Sacramento, and the County of Sacramento. SCGA was formed for several purposes including maintaining the long-term sustainable yield of the Sacramento Valley

⁴ Environmental Investigation Services, Inc. *Phase I Environmental Site Assessment – 3880, 3990, 4690, and 4696 Bayou Way, Sacramento County, California*. September 14, 2022.

⁵ North American Subbasin Groundwater Sustainability Agencies. *Water Year 2021 – Annual Report for the North American Subbasin*. March 2022.



subbasins, managing the use of groundwater in the basin, and facilitating the implementation of a conjunctive use program. The SCGA Groundwater Management Plan, which was adopted in 2006, establishes a framework for maintaining sustainable groundwater resources in the North Basin. The framework includes specific goals, objectives, and an action plan to manage the basin. The SCGA Groundwater Management Plan also prescribes a well protection program to protect existing private domestic well and agricultural well owners from declining groundwater levels resulting from increased groundwater pumping due to new development in the basin. The SCGA Groundwater Management Plan includes a detailed groundwater management implementation plan to comply with the requirements of their basin management objectives. Additionally, SCGA prepares a biennial report to evaluate progress on Groundwater Management Plan implementation and to report on basin conditions.

4.8.3 REGULATORY CONTEXT

The following is a description of federal, State, and local environmental laws and policies that are relevant to the review of hydrology and water quality under the CEQA process.

Federal Regulations

The following section includes federal environmental goals and policies relevant to the CEQA review process pertaining to the hydrology and water quality aspects of the proposed project.

Federal Emergency Management Agency

The FEMA is responsible for determining flood elevations and floodplain boundaries based on USACE studies. FEMA is also responsible for distributing the FIRMs, which are used in the National Flood Insurance Program (NFIP). The FIRMs identify the locations of special flood hazard areas, including the 100-year floodplains.

FEMA allows non-residential development in the floodplain; however, construction activities are restricted within flood hazard areas, depending upon the potential for flooding within each area. Federal regulations governing development in a floodplain are set forth in Title 44, Part 60 of the Code of Federal Regulations (CFR). These standards are implemented at the State level through construction codes and local ordinances; however, these regulations only apply to residential and non-residential structure improvements. Although roadway construction or modification is not explicitly addressed in the FEMA regulations, the California Department of Transportation (Caltrans) has also adopted criteria and standards for roadway drainage systems and projects situated within designated floodplains. Standards that apply to floodplain issues are based on federal regulations (Title 23, Part 650 of the CFR). At the State level, roadway design must comply with drainage standards included in Chapters 800-890 of the Caltrans Highway Design Manual. CFR Section 60.3(c)(10) restricts cumulative development from increasing the water surface elevation of the base flood by more than one foot within the floodplain.

Federal Clean Water Act

The National Pollutant Discharge Elimination System (NPDES) permit system was established in the federal Clean Water Act (CWA) to regulate municipal and industrial discharges to surface waters of the U.S. Each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that the Environmental Protection Agency (EPA) must consider in setting effluent limits for priority pollutants.



Nonpoint sources are diffuse and originate over a wide area rather than from a definable point. Nonpoint pollution often enters receiving water in the form of surface runoff, but is not conveyed by way of pipelines or discrete conveyances. As defined in the federal regulations, such nonpoint sources are generally exempt from federal NPDES permit program requirements. However, two types of nonpoint source discharges are controlled by the NPDES program – nonpoint source discharge caused by general construction activities, and the general quality of stormwater in municipal stormwater systems. The 1987 amendments to the CWA directed the federal EPA to implement the stormwater program in two phases. Phase I addressed discharges from large (population 250,000 or above) and medium (population 100,000 to 250,000) municipalities and certain industrial activities. Phase II addresses all other discharges defined by EPA that are not included in Phase I.

Section 402 of the CWA mandates that certain types of construction activities comply with the requirements of the NPDES stormwater program. The Phase II Rule, issued in 1999, requires that construction activities that disturb land equal to or greater than one acre require permitting under the NPDES program. In California, permitting occurs under the General Permit for Stormwater Discharges Associated with Construction Activity, issued to the State Water Resources Control Board (SWRCB), implemented and enforced by the nine Regional Water Quality Control Boards (RWQCBs).

As of July 1, 2010, all dischargers with projects that include clearing, grading or stockpiling activities expected to disturb one or more acres of soil are required to obtain compliance under the NPDES Construction General Permit Order 2009-0009-DWQ. The General Permit requires all dischargers, where construction activity disturbs one or more acres, to take the following measures:

1. Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to include a site map(s) of existing and proposed building and roadway footprints, drainage patterns and stormwater collection and discharge points, and pre- and post- project topography;
2. Describe types and placement of Best Management Practices (BMPs) in the SWPPP that will be used to protect stormwater quality;
3. Provide a visual and chemical (if non-visible pollutants are expected) monitoring program for implementation upon BMP failure; and
4. Provide a sediment monitoring plan if the area discharges directly to a water body listed on the 303(d) list for sediment.

To obtain coverage, a SWPPP must be submitted to the RWQCB electronically and a copy of the SWPPP must be submitted to the City of Sacramento. When project construction is completed, the landowner must file a Notice of Termination (NOT).

State Regulations

The following section includes the State regulations relevant to the CEQA review process pertaining to the hydrology and water quality aspects of the proposed project.

State Water Resources Control Board

The SWRCB and the RWQCBs are responsible for ensuring implementation and compliance with the provisions of the federal CWA and California's Porter-Cologne Water Quality Control Act. The project site is situated within the jurisdictional boundaries of the Central Valley RWQCB (Region



5). The Central Valley RWQCB has the authority to implement water quality protection standards through the issuance of permits for discharges to waters at locations within their jurisdiction.

Central Valley Regional Water Quality Control Board

As authorized by the Porter-Cologne Water Quality Control Act, the Central Valley RWQCB primary function is to protect the quality of the waters within its jurisdiction for all beneficial uses. State law defines beneficial uses of California's waters that may be protected against quality degradation to include, but not be limited to: domestic; municipal; agricultural and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves.

The Central Valley RWQCB implements water quality protection measures by formulating and adopting water quality control plans (referred to as basin plans, as discussed below) for specific groundwater and surface water basins, and by prescribing and enforcing requirements on all agricultural, domestic, and industrial waste discharges. The Central Valley RWQCB oversees many programs to support and provide benefit to water quality, including the following major programs: Agricultural Regulatory; Above-Ground Tanks; Basin Planning; CALFED; Confined Animal Facilities; Landfills and Mining; Non-Point Source; Spills, Leaks, Investigations, and Cleanups (SLIC); Stormwater; Total Maximum Daily Load (TMDL); Underground Storage Tanks (UST), Wastewater Discharges (including the NPDES); Water Quality Certification; and Watershed Management.

The Central Valley RWQCB is responsible for issuing permits for a number of varying activities. Activities subject to the Central Valley RWQCB permitting requirements include stormwater, wastewater, and industrial water discharge, disturbance of wetlands, and dewatering. Permits issued and/or enforced by the Central Valley RWQCB include, but are not limited to, the NPDES Construction General Permit, NPDES Municipal Stormwater Permits, Industrial Stormwater General Permits, Clean Water Act Section 401 and 404 Permits, and Dewatering Permits.

Basin Plans and Water Quality Objectives

The Porter-Cologne Water Quality Control Act provides for the development and periodic review of water quality control plans (basin plans) that are prepared by the regional water quality control boards. Basin plans designate beneficial uses of California's major rivers and groundwater basins, and establish narrative and numerical water quality objectives for those waters. Beneficial uses represent the services and qualities of a water body (i.e., the reasons why the water body is considered valuable), while water quality objectives represent the standards necessary to protect and support those beneficial uses. Basin plans are primarily implemented through the NPDES permitting system and by issuing waste discharge regulations to ensure that water quality objectives are met.

Basin plans provide the technical basis for determining waste discharge requirements and taking regulatory enforcement actions if deemed necessary. The project site is located within the jurisdiction of the Central Valley RWQCB. A basin plan has been adopted for the Sacramento and San Joaquin River Basin (Basin Plan), which covers all of the project area.

The Basin Plan sets water quality objectives for the surface waters in its region for the following substances and parameters: ammonia, bacteria, biostimulatory substances, chemical constituents, color, dissolved oxygen, floating material, oil and grease, pH, radioactivity, salinity, sediment, settleable material, suspended material, taste and odor, temperature, toxicity, turbidity, and



pesticides. For groundwater, water quality objectives applicable to all groundwater have been set for bacteria, chemical constituents, radioactivity, taste, odors, and toxicity.

Senate Bill 5

In 2007, the State of California set the 200-year event as the Urban Level of Flood Protection (ULOP) for the State through a series of laws included in Senate Bill (SB) 5. Along with other related legislation, SB 5 established a mandate for local governments to amend their general plans and zoning codes to be consistent with State law on floodplain management. Specifically, SB 5 requires all cities and counties within the Sacramento-San Joaquin Valley, as defined in California Government Code Sections 65007(h) and (j), to make findings related to an ULOP or the national FEMA standard of flood protection before: (1) entering into a development agreement for any property that is located within a flood hazard zone; (2) approving a discretionary permit or other discretionary entitlement, or a ministerial permit that would result in the construction of a new residence, for a project that is located within a flood hazard zone; or (3) approving a tentative map, or a parcel map for which a tentative map was not required, for any subdivision that is located within a flood hazard zone. The primary purpose of the law is to ensure that appropriate flood protection is provided in urban and urbanizing areas.

A project would be subject to the requirements of SB 5 if the project would meet all of the following five criteria:

1. Located within an urban area that is a developed area, as defined by CFR Title 44, Section 59.1, with 10,000 residents or more, or an urbanizing area that is a developed area or an area outside a developed area that is planned or anticipated to have 10,000 residents or more within the next 10 years.
2. Located within a flood hazard zone that is mapped as either a special hazard area or an area of moderate hazard on FEMA's official (i.e., effective) FIRM for the NFIP.
3. Located within the Sacramento-San Joaquin Valley.
4. Located within an area with a potential flood depth above 3.0 feet, from sources of flooding other than localized conditions that may occur anywhere in a community, such as localized rainfall, water from stormwater and drainage problems, and water from temporary water and wastewater distribution system failure.
5. Located within a watershed with a contributing area of more than 10 square miles.

Based on a Technical Memorandum prepared for the proposed project by Wood Rodgers,⁶ the proposed project would meet criteria 1, 2, and 3 above. With regard to criterion 4, while the project area is subject to a flood depth above three feet from failure of the surrounding Natomas levee system, with the completion of the Natomas levees, the interior floodplain of the project site would not be greater than three feet deep during the 200-year storm event. Additionally, with regard to criterion 5, the project site is located within a watershed area of more than 10 square miles when considering the sources of river flooding resulting from the Natomas levee failure. However, with the pending completion of the Natomas levee improvements, Wood Rodgers evaluated the local drainage watersheds affecting the project in perpetuity, and determined that certification of the Natomas levees would remove regional watershed area applicability for the proposed project. As such, with local watersheds, the threshold of 10 square miles is not reached until just downstream of the project site. Therefore, the Wood Rodgers determined that the proposed project would not meet criteria 4 or 5, and, as a result, would not be subject to the requirements of SB 5.

⁶ Wood Rodgers. *Airport South Industrial – Determination of Urban Level of Flood Protection Application*. June 30, 2023.



Local Regulations

Relevant goals and policies from the City of Sacramento 2040 General Plan as well as various other local guidelines and regulations related to hydrology and water quality, are discussed below.

City of Sacramento 2040 General Plan

The following goals and policies from the City of Sacramento 2040 General Plan related to hydrology and water quality are applicable to the proposed project:

Environmental Resources and Constraints Element

Goal ERC-1 Responsible management of water resources that preserves and enhances water quality and availability.

Policy ERC-1.3 **Runoff Contamination.** The City shall protect surface water and groundwater resources from contamination from point (single location) and non-point (many diffuse locations) sources, as required by federal and State regulations.

Policy ERC-1.4 **Construction Site Impacts.** The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, stormwater treatment, runoff reduction measures, best management practices (BMPs), Low Impact Development (LID), and hydromodification strategies to avoid or minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

Goal ERC-5 Careful stewardship and efficient consumption of water and energy.

Policy ERC-5.2 **Reducing Storm Runoff.** The City shall encourage project designs that minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff.

Goal ERC-6 Protection of life and property from flooding hazards.

Policy ERC-6.4 **Floodplain Requirements.** The City shall regulate development within floodplains in accordance with State and federal requirements and maintain the City's eligibility under the National Flood Insurance Program.

Policy ERC-6.6 **Flood Regulations.** The City shall continue to regulate new development in accordance with State requirements for 200-year level of flood protection and federal requirements for 100-year level of flood protection.



- Policy ERC-6.7 **Flood Hazard Risk Evaluation.** The City shall require evaluation of potential flood hazards prior to approval of development projects and shall require new development located within a Special Flood Hazard Area to be designed to meet federal and State regulations and minimize the risk of damage in the event of a flood.

Public Facilities and Safety Element

Goal PFS-3 Efficient, high-quality utility infrastructure and services to meet the needs of residents and business throughout the city.

- Policy PFS-3.1 **Provision of Adequate Utilities.** The City shall continue to provide reliable water, wastewater, and stormwater drainage utility services.

- Policy PFS-3.15 **Adequate Drainage Facilities.** The City shall ensure that all new municipal drainage facilities are adequately sized and constructed to accommodate stormwater runoff, including incorporating “green infrastructure” design and Low Impact Development (LID) techniques, where appropriate, stormwater treatment features, and, if applicable, trash capture devices for its stormwater facilities.

- Policy PFS-3.16 **Stormwater Design in Private Development.** The City shall require proponents of new development and redevelopment projects to submit drainage studies that adhere to City stormwater design requirements and incorporate measures, including “green infrastructure”, Low Impact Development (LID) techniques, stormwater treatment, and, if applicable, trash capture devices, to prevent on- or off-site flooding and improve runoff water quality.

City of Sacramento Municipal Code

The City’s Municipal Code includes ordinances associated with hydrology and water quality. The applicable ordinances are discussed in further detail below.

Sacramento City Code Chapter 13.16

The purpose of Chapter 13.16, Stormwater Management and Discharge Control, of the City’s Municipal Code, is to protect and promote the health, safety and general welfare of the citizens of the City by controlling non-stormwater discharges to the stormwater conveyance system, by eliminating discharges to the stormwater conveyance system from spills, dumping, or disposal of materials other than stormwater, and by reducing pollutants in urban stormwater discharges to the maximum extent practicable. The chapter is intended to assist in the protection and enhancement of the water quality of watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Federal Water Pollution Control Act, Porter-Cologne Water Quality Control Act, and NPDES Permit. The provisions of Chapter 13.16 are applicable to all users and potential users located within the incorporated area of the City and all users that discharge either directly or indirectly into the City’s storm water conveyance system.



Sacramento City Code Chapter 15.88

The City of Sacramento's Grading, Erosion, and Sediment Control Ordinance (Chapter 15.88 of the City's Municipal Code) is enacted for the purpose of regulating grading on property within the City limits to safeguard life, limb, health, property and the public welfare; to avoid pollution of watercourses with nutrients, sediments, or other materials generated or caused by surface water runoff; to comply with the City's NPDES Permit; and to ensure that the intended use of a graded site within the City limits is consistent with the City's 2040 General Plan, any specific plans adopted thereto and all applicable City ordinances and regulations. The grading ordinance is intended to control all aspects of grading operations within the City. Chapter 15.88 requires that development projects comply with the requirements of the City's Stormwater Quality Improvement Plan (SQIP). The SQIP outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management Program, which is based on the NPDES Municipal Stormwater Discharge Permit. The comprehensive Stormwater Management Program includes pollution-reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

Sacramento City Code Chapter 15.104

The intent of Chapter 15.103, Floodplain Management Regulations, is to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas of the City. The chapter regulates development which is or might be dangerous to health, safety and property by requiring at the time of initial development or substantial improvement methods of protection against flood damage in areas vulnerable to flooding in order to minimize flood damage. The following developmental impacts are regulated by Chapter 15.104: filling, grading or erosion, alteration of natural flood plains, stream channels or water courses, the imposition of barriers which increase flood hazards, or any other impacts that aggravate or cause flood hazards.

4.8.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to hydrology and water quality. A discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, a significant impact would occur if the proposed project would result in any of the following:

- Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade water quality;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge;
- 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:
 - Result in substantial erosion or siltation on- or off-site;
 - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;



- 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;
- Impede or redirect flood flows;
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation;
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The proposed project's impacts associated with erosion or siltation on- or off-site are discussed in Chapter 4.6, Geology and Soils, of this EIR.

Method of Analysis

The impacts analysis for this chapter is based primarily on the Preliminary Drainage Study prepared for the proposed project by Wood Rodgers. The Preliminary Drainage Study included hydrologic modeling for the proposed project (both pre-project and post-project conditions) using the XPSWMM modeling program. The project-specific XPSWMM modeling used the regional base modeling provided by RD 1000, with project-specific changes, as discussed below.

As previously discussed, Wood Rodgers determined that the proposed project is not subject to requirements of SB 5, and thus, is exempt from 200-year flood protection design. In order to identify the pre-project conditions, including storage using within the project area during the 100-year storm, modifications to the regional base model provided by RD 1000 were made to include new detailed topographic mapping and other information known for the specific area of the Natomas Basin in which the project site is located. The changes to the original model are summarized as follows:

1. All improvements to the RD 1000 system listed in the Metro Air Park (MAP) Finance Plan dated 2020, with a corrected pumping increase at Pumping Plant 3 (with the exception of additional twin 78-inch culverts under I-5).
2. The existing conditions in the project area are modeled as two storage nodes. Based on the detailed site topography that was flown on October 12, 2021, the storage curves are updated.
3. The links that connect the project area storage nodes to the RD 1000 L Drain and West Drainage Canal confluence are simplified to 1,000-foot-long, 50-foot-wide rectangular conduits within the original model. The invert elevations of the rectangular conduits were modified to reflect the latest topography.
4. The North Lake project (formerly Greenbriar) has been incorporated into the baseline condition, north of I-5, as a single developed watershed with a single detention basin and outlet connection to the RD 1000 system.

To represent the post-project conditions within the hydraulics model, the following changes were made to the pre-project model:

1. Storage curves were modified based on the proposed on-site grading. For the areas of the project site where grading has not been designed yet, to estimate a conceptual storage curve, a parking lot area was assumed based on the percent parking area of the total area for Parcels 1 through 5. A square detention basin with a bottom elevation of three feet was estimated to represent the area of detention required to replace the pre-project storage



- under the 100-year water surface. The upper 0.9 feet of storage was allowed to spread out over the estimated area of the parking lot.
2. The new storage node was added to represent the portion of eastern development to the north separately from the conceptual design of Parcel 8.
 3. All proposed storage nodes were connected with a 24-inch pipe at the invert of each storage node to allow for drainage to the proposed pump station. Each pipe includes a proposed flap gate to prevent flow from backfilling between development areas.
 4. A proposed new pump was added to discharge all development drainage to the RD 1000 L Drain. The new pump capacity is 35 cubic feet per second (cfs), using two 17.5 cfs pumps. A new node was added to the RD 1000 L Drain to accommodate the new pump injection.
 5. The weir spill to Parcel 8 was relocated from the RD 1000 L Drain and West Drainage Canal confluence to a point further upstream along the RD 1000 L Drain. A new node was added to the RD 1000 L Drain to accommodate the weir flow relocation.

It should also be noted that in the pre-project conditions model, the soils within the project area have extremely low infiltration (0.0031 inch/hour). Adding impervious surfaces due to development is not anticipated to substantially increase runoff volumes; however, the timing of runoff entering detention can be accelerated through paved (impervious) areas of development. Therefore, at the request of RD 1000, changes to the pre-project hydrology were made to represent the post-project hydrology by modifying the percentage of impervious coverage to levels consistent with industrial land uses.

The City has reviewed the technical analysis prepared for the proposed project and preliminarily concurs with the methodology applied by Wood Rodgers, as well as the conclusions provided therein.

Project Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in comparison with the standards of significance identified above.

4.8-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The proposed project would include development of an industrial park within a 353.5-acre portion of the project site. The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. Given that development of both the industrial park and nonparticipating parcels would result in the construction of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction. In addition, the analysis includes evaluation of the proposed off-site improvements.



Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Construction of the proposed project would include grading, excavation, trenching for utilities, and other construction-related activities that could cause soil erosion at an accelerated rate during storm events. All such activities have the potential to affect water quality and contribute to localized violations of water quality standards if impacted stormwater runoff from construction activities enters downstream waterways.

Soils exposed by the aforementioned types of construction activities have the potential to affect water quality in three ways: 1) suspended soil particles and sediments transported through runoff; or 2) sediments transported as dust that eventually reach local water bodies; or 3) spills or leaks from heavy equipment and machinery, staging areas, or building sites potentially entering runoff. Typical pollutants include, but are not limited to, petroleum and heavy metals from equipment and products such as paints, solvents, and cleaning agents, which could contain hazardous constituents. Sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of building products could result in water quality degradation if runoff containing the sediment or contaminants should enter receiving waters in sufficient quantities. Discharge of polluted stormwater or non-stormwater runoff could violate waste discharge requirements. However, in general, impacts from construction-related activities would be short-term and of limited duration.

Because the proposed project (including future development of the nonparticipating parcels) would require construction activities that would result in a land disturbance of over an acre, the project applicant would be required by the State to comply with the most current Construction General Permit requirements. Per the requirements, a SWPPP would be prepared for the overall project, which would include the site map, drainage patterns and stormwater collection and discharge points, BMPs, and a monitoring and reporting framework for implementation of BMPs, as necessary. In addition, a Notice of Intent (NOI) would be filed with Central Valley RWQCB.

As discussed in further depth in Chapter 4.6, Geology and Soils, of this EIR, development of the SWPPP would include plans to treat stormwater runoff in accordance with the standards of the California Stormwater Management Practice New Development and Redevelopment Handbook. The plan would include drainage design from all paved surfaces, including streets, parking lots, driveways, and roofs, as well as landscaping. In addition, the project would be subject to Chapter 15.88 of the City's Municipal Code. Chapter 15.88 of the City Code regulates grading and erosion by requiring all projects that grade within the City, except where exempt, submit an application for review by the City prior to approval of a grading permit. The application must include a grading plan and a sediment and erosion plan which would be reviewed for safety of grading and potential for erosion. Therefore, the project applicant would be required to prepare a grading plan and a sediment and erosion plan. The grading plan and a sediment and erosion plan would include erosion control measures and sediment control measures to ensure the stability of the ground surface and soil within the project site during construction activities.



Non-stormwater management and material management controls reduce non-sediment-related pollutants from potentially leaving the construction site to the extent practicable. The Construction General Permit prohibits the discharge of materials other than stormwater and authorized non-stormwater discharges (such as irrigation and pipe flushing and testing). Non-stormwater BMPs tend to be management practices with the purpose of preventing stormwater from coming into contact with potential pollutants. Examples of non-stormwater BMPs include preventing illicit discharges, and implementing good practices for vehicle and equipment maintenance, cleaning, and fueling operations, such as using drip pans under vehicles. Waste and materials management BMPs include implementing practices and procedures to prevent pollution from materials used on construction sites. Examples of materials management BMPs include the following:

- Good housekeeping activities such as storing of materials covered and elevated off the ground, in a central location;
- Securely locating portable toilets away from the storm drainage system and performing routine maintenance;
- Providing a central location for concrete washout and performing routine maintenance;
- Providing several dumpsters and trash cans throughout the construction site for litter/floatable management; and
- Covering and/or containing stockpiled materials and overall good housekeeping on the site.

While the final materials management BMPs to be used during construction of the proposed project are currently unknown, the project would likely include a combination of the BMP examples listed above. Final BMPs for the proposed project construction would be chosen in consultation with the applicable California Stormwater Quality Association Stormwater BMP Handbooks and Section 11 of the City's Development Standards, and implemented by the project contractor.

In accordance with the Construction General Permit, the project site would also be inspected during construction before and after storm events and every 24 hours during extended storm events in order to identify maintenance requirements for the implemented BMPs and to determine the effectiveness of the implemented BMPs. As a "living document", the site-specific SWPPP that would be prepared for the proposed project would be modified as construction activities progress. A Qualified SWPPP Practitioner (QSP) would ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The QSP for the project would amend the SWPPP and revise project BMPs, as determined necessary through field inspections, to protect against substantial erosion or siltation on- or off-site.

Compliance with the State's Construction General Permit, Section 11 of the Development Standards, and Chapter 15.88 of the Sacramento City Code, as described above, would minimize the potential degradation of stormwater quality and downstream surface water associated with construction of the proposed project. In addition, BMPs would be required to be designed in accordance with the California Stormwater Quality Association Stormwater Best Management Practice Handbooks



for Construction and for New Development/Redevelopment and Section 11 of the Development Standards (or other similar source as approved by the City). However, because a SWPPP has not yet been prepared for the proposed project, proper compliance with the aforementioned regulations cannot be ensured at this time, and the proposed project's construction activities could violate water quality standards or waste discharge requirements or otherwise degrade water quality. Therefore, the proposed project could result in a **significant** impact related to short-term construction-related water quality.

Mitigation Measure(s)

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

4.8-1 *Prior to issuance of any grading permits, the contractor shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for review and approval by the Central Valley RWQCB. The contractor shall file the Notice of Intent (NOI) and associated fee to the SWRCB. The SWPPP shall serve as the framework for identification, assignment, and implementation of BMPs. The contractor shall implement BMPs to reduce pollutants in stormwater discharges to the maximum extent practicable. Construction (temporary) BMPs for the project may include, but are not limited to: fiber rolls, straw bale barrier, straw wattles, storm drain inlet protection, velocity dissipation devices, silt fences, wind erosion control, stabilized construction entrance, hydroseeding, revegetation techniques, and dust control measures. The SWPPP shall be submitted to both the City Director of Public Works, and the City Engineer for review and approval and shall remain on the project site during all phases of construction. Following implementation of the SWPPP, the contractor shall subsequently demonstrate the SWPPP's effectiveness and provide for necessary and appropriate revisions, modifications, and improvements to reduce pollutants in stormwater discharges to the maximum extent practicable.*

4.8-2 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations. Based on the analysis below and with implementation of mitigation, the impact is less than significant.

Given that both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations. In addition, the analysis includes evaluation of the proposed off-site improvements. Because the proposed off-site force main, including each of the three potential force main segment options, would be constructed in accordance with the applicable standards set forth in the SacSewer Standards and Specifications and installed underground, the proposed off-site force main would not



violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during project operation.

Industrial Park and Nonparticipating Parcels

Development of the proposed project would result in the conversion of a rural area to an industrial park, which would include the development of industrial uses, as well as retail/highway commercial uses, and hotel/hospitality uses, within the project site. Such new land uses could result in new stormwater pollutants being introduced to the project area. Pollutants associated with the operational phase of the proposed project could include nutrients, oil and grease, metals, organics, pesticides, bacteria, sediment, trash, and other debris. Nutrients that could be present in post-construction stormwater include nitrogen and phosphorous resulting from fertilizers applied to landscaping. Excess nutrients could affect water quality by promoting excessive and/or a rapid growth of aquatic vegetation, which reduces water clarity and results in oxygen depletion. Pesticides, which are toxic to aquatic organisms and can bioaccumulate in larger species, such as birds and fish, can potentially enter stormwater after application to landscaped areas within the project site. Oil and grease could enter stormwater from vehicle leaks, traffic, and maintenance activities. Metals could enter stormwater as surfaces corrode, decay, or leach. Clippings associated with landscape maintenance and street litter could be carried into storm drainage systems. Pathogens (from wildlife and human activities) have the potential to affect downstream water quality. It should also be noted that the project site was historically used as hay fields, with possible intermittent rice fields from 1937 until at least 2020. Therefore, the potential exists for residual pesticides and/or to fertilizers be present in on-site soils.

Development of the proposed project could also increase polluted non-stormwater runoff (e.g., wash water and landscape irrigation runoff). Such non-stormwater runoff could flow down sidewalks, parking areas, and streets, and pick up additional pollutants deposited on impervious surfaces prior to discharge into the storm drain system and surface waters. Discharge of polluted stormwater or non-stormwater runoff could violate waste discharge requirements.

Proposed Storm Drain System

According to the Preliminary Drainage Study prepared for the proposed project, the proposed project would include an on-site storm drain system composed of post construction stormwater quality measures such as Low Impact Development (LID) components, dedication of landscaping areas, and six on-site detention basins, consistent with the Sacramento Region Stormwater Quality Design Manual.

Impervious surfaces proposed as part of the project include building roofs, driveways, and roadways. Runoff from such surfaces would be captured by the on-site stormwater drainage system. The on-site drainage system would consist of a series of detention basins located adjacent to the RD 1000 ditches and canals that border the western and southern boundaries of the project site, and areas adjacent to the RD 1000 L Drain (which bisects the eastern portion of the project site) (see Figure 4.8-3). The basins would each be interconnected with 36-inch diameter culvert(s) or larger in order to provide a single continuous system. The basins would be connected to the RD 1000 system through weirs to meet the pre-project spill conditions and to provide on-site floodplain storage (see Figure 4.8-4).



**Figure 4.8-3
 Proposed On-Site Drainage Conditions**

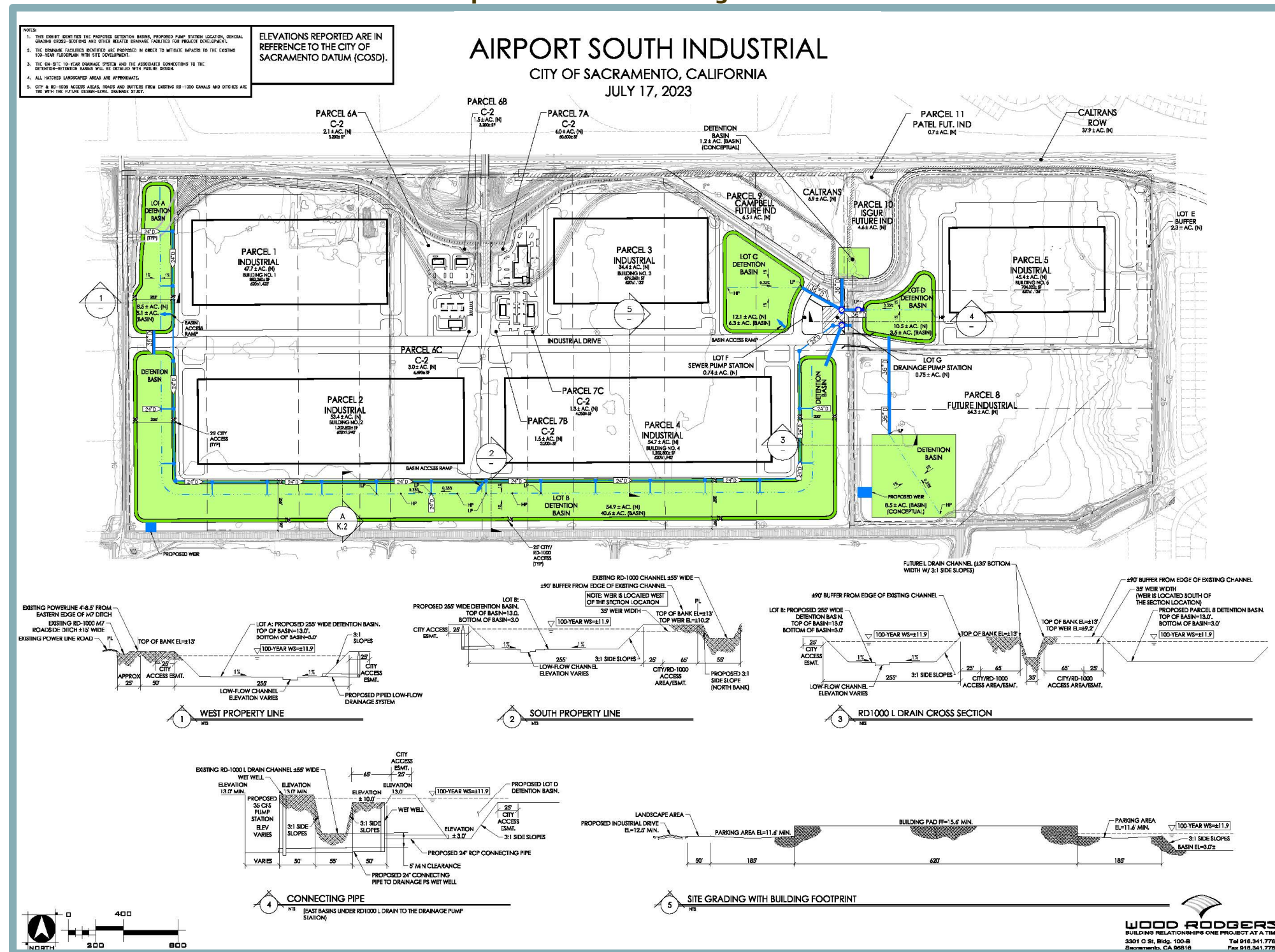
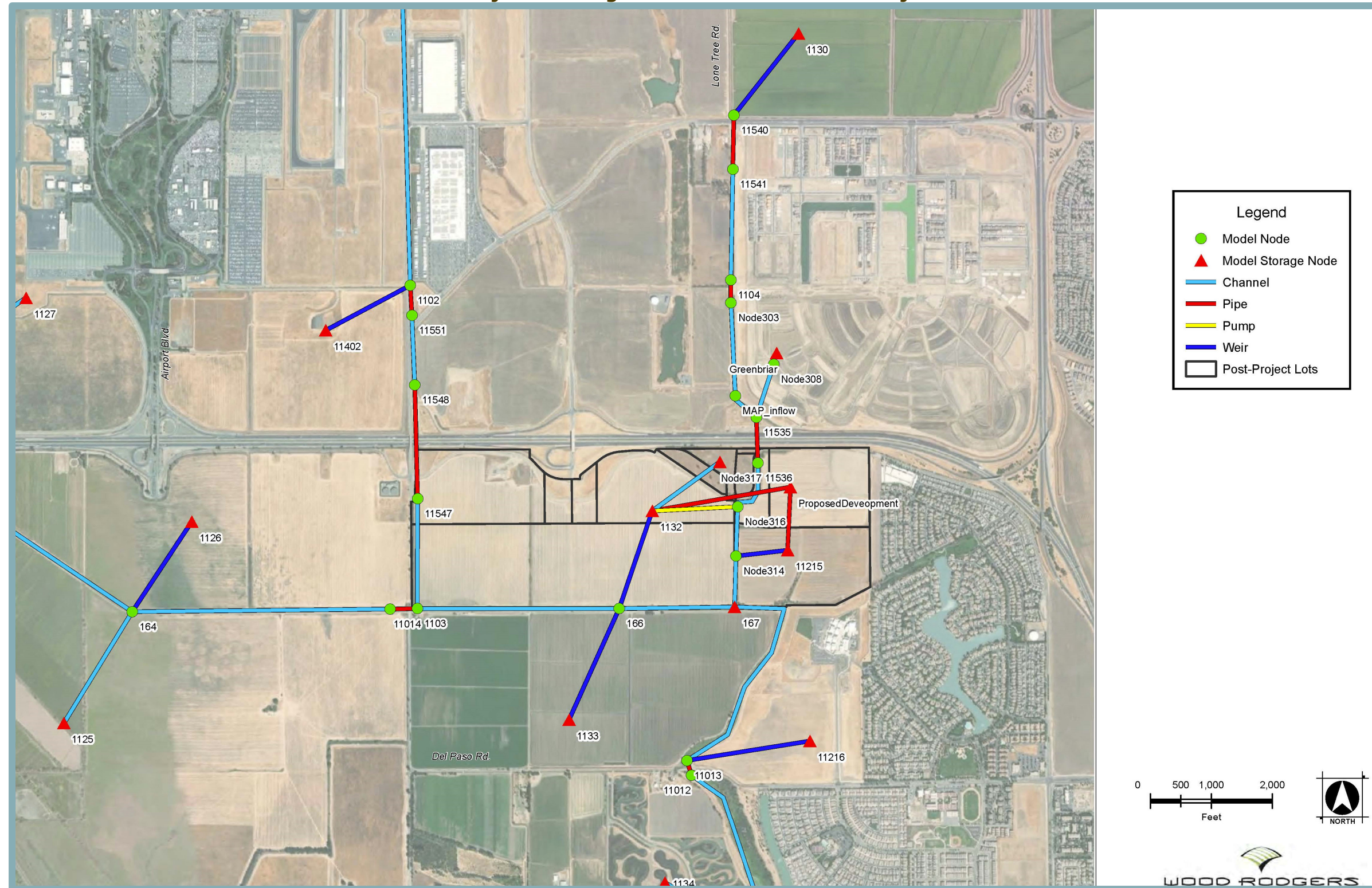


Figure 4.8-4
Post-Project Drainage Conditions Within the Project Area



The on-site stormwater drainage system would be controlled by a pump station currently planned to be located near the intersection of the RD 1000 L Drain and the proposed Airport South Industrial Drive. The pump station discharge capacity would be 35 cfs, modeled as two 17.5-cfs pumps. A low-flow pump may also be incorporated to maintain the flood control depth needed in the basin for the winter months, or as needed to keep the basins drawn down in the summer months. Low flow pumps are typically not operated during flood control operations. The two basin areas on the east side of the RD 1000 L Drain would interconnect from south to north.

The north basin would then connect to the proposed drainage pump station through a pipe crossing under the RD 1000 L Drain, and a box structure and manhole/vault on each side of the RD 1000 L Drain, prior to a connection to the proposed pump station. Trash capture is anticipated to be achievable at the inlet to the pump station through screen mechanisms or mesh bags. The proposed on-site stormwater drainage system is a closed system that would only experience external influences during larger events like the 100-year event. Therefore, 10-year system modeling and design is anticipated to be significantly lower than 100-year levels. Therefore, the approximate volumes for pre-project and post-project detention during the 100-year storm event are presented in Table 4.8-1.

| Table 4.8-1 Proposed Detention Basin Sizing | | | | |
|--|----------------|---|--|---|
| Property Owner | Acreage | Pre-Project Acreage within 100-Year Floodplain | Pre-Project Maximum Water Volume Stored During 100-Year Event (acre feet) | Post-Project Maximum Water Volume Stored During 100-Year Event (acre feet) |
| North Pointe AKT | 353.5 | 308.8 | 174.6 | 362.3 |
| Cayocca* | 64.3 | 37.1 | 18.4 | 75.0 |
| Campbell* | 6.5 | 6.5 | 3.5 | 1.8 |
| Isgur* | 4.6 | 4.6 | 2.5 | 1.3 |
| Patel* | 0.7 | 0.3 | 0.3 | 0.2 |
| Caltrans Remnant* | 6.9 | 6.8 | 3.7 | 1.9 |
| <i>Total</i> | <i>436.5</i> | <i>364.1</i> | <i>203.0</i> | <i>442.5</i> |
| Note: Some of the maximum water volumes reported in the table above were obtained by dividing model results by property owner boundaries, rather than watershed and/or development boundaries. An area weighting method was used to aggregate and divide post-project storage volume on a property owner basis for the Campbell, Isgur and Patel properties that share a single detention basin. | | | | |
| *At the time of the Preliminary Drainage Study was prepared, preliminary on-site grading has not been assessed. Detention volumes are preliminary. | | | | |
| Source: Wood Rodgers, 2023. | | | | |

As shown in the table, the proposed LID features would be sufficiently sized to meet the required storage volumes. Thus, project runoff would be properly treated, and would not pollute downstream waterways. It should be noted that the City would own



and operate the future on-site system that would detain and/or retain storm drainage runoff prior to discharge into the RD 1000 System.

Maintenance and Inspection

In order to ensure continued operation of the proposed LID control features, the City would provide regular inspection and maintenance of such features. For example, plants and vegetation within the detention basins would be inspected monthly, and the basins would be inspected for the presence of standing water 72 hours after rain events. Maintenance activity would include, but not necessarily be limited to, removal of debris from basins and removal of debris from outlets of basins. In addition, any method of trash capture would require frequent monitoring and cleaning to keep the pump station fully operational.

Conclusion

Based on the above, the proposed project includes site design measures to ensure that stormwater runoff is properly treated prior to discharge. Thus, urban pollutants entering and potentially degrading local water quality would not be expected to occur as a result of the project. In addition, it should be noted that Mitigation Measure 4.7-5(a) requires preparation of a design and management plan to determine the appropriate size and location for the proposed detention basins and incorporate specific design measures deemed sufficient by the Sacramento County Airport System (SCAS) and Airport Land Use Commission (ALUC). However, because a final BMP and water quality maintenance plan has not been prepared, the incorporation of proper source control measures cannot be ensured. Should the project applicant fail to prepare and implement such documentation, the proposed project could result in a **significant** impact related to a violation of water quality standards or waste discharge requirements or otherwise substantial degradation of surface or ground water quality during operations.

Mitigation Measure(s)

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

- 4.8-2 *Prior to approval of final project improvement plans for any on-site development, the project applicant shall submit a detailed Best Management Practice (BMP) and water quality maintenance plan to the City for review and approval. The BMP and water quality maintenance plan shall meet the standards of the City's NPDES Permit, the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, and the Stormwater Quality Design Manual for the Sacramento region. Site design measures, source control measures, hydromodification management, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the improvement plans.*



4.8-3 Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Based on the analysis below, the impact is less than significant.

Given that the industrial park and nonparticipating parcels are located within the same groundwater subbasin and would be provided water from the same source, the following discussion applies to the potential for both project components to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Because the proposed off-site force main, including each of the three potential force main segment options, would be installed either in existing roadway right-of-way (ROW) or in other previously disturbed areas, the proposed off-site force main would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

Industrial Park and Nonparticipating Parcels

Upon annexation into the City as part of the proposed project, the City would be responsible for providing water to the project site. The City's water infrastructure network consists of two surface water treatment facilities, two pressure zones, and a supporting system of groundwater wells, pumping facilities, storage tanks, and distribution/transmission pipelines. As discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, the City's 2020 Urban Water Management Plan (UWMP) includes a water service reliability assessment of the City's projected supplies and demands during normal, single dry, and five consecutive dry years. Under the various water year types, the total annual water supply sources available are compared to the total annual projected water use for the City's water service area from 2025 to 2045 in five-year increments. As shown in Table 4.11-9 of this EIR, the City is projected to have a surplus of water supplies in all water year types through 2045. With respect to the demand anticipated to be generated by the proposed project, the Targeted Municipal Services Review (MSR) prepared for the proposed project incorporates results from the modeling conducted as part of the Preliminary Water Study prepared for the proposed project to estimate the project's water demands, which are summarized in Table 4.11-10 of this EIR. As shown therein, the City's existing water supplies would be able to accommodate the demand anticipated to be generated by the City's existing commitments, as well as the water demand projected for the proposed project. Therefore, while a portion of the water supplied to the project site by the City would be obtained through groundwater resources, such groundwater usage would not substantially deplete groundwater supplies within the project area.



The proposed project would result in an increase in on-site impervious surfaces, which would reduce the infiltration of groundwater as compared to existing conditions. However, as discussed above, the soils within the project area have extremely low infiltration rate (0.0031 inch/hour). As such, the project site would not be considered an important groundwater recharge area. Furthermore, the proposed project would include the development of six on-site detention basins, which would allow for the on-site infiltration of surface water to continue, and contribute to groundwater recharge. Given the limited recharge potential of the project site, the proposed project would not interfere substantially with groundwater recharge. Furthermore, the groundwater subbasin within which the project site is located is not currently in a state of overdraft.

Considering that the project site is not considered an important groundwater recharge area, stormwater from the project site would continue to replenish groundwater through percolation into soils within the on-site detention basins, and that the project would not involve substantially increased demand on groundwater supplies within an area in a state of overdraft, the proposed project would not create a conflict with, or impede the implementation of, a sustainable groundwater plan. Thus, impacts related to groundwater would be *less than significant*.

Mitigation Measure(s)

None required.

4.8-4 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: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or 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. Based on the analysis below, the impact is *less than significant*.

Given that both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to substantially alter the drainage pattern of the site or area, or increase the rate or amount of surface runoff within the project area. Because the proposed off-site force main, including each of the three potential force main segment options, would be installed either in existing roadway ROW or in other previously disturbed areas, the proposed off-site force main would not substantially alter the existing drainage pattern of the off-site force main alignment.

Industrial Park and Nonparticipating Parcels

It should be noted that the potential for the proposed project to result in substantial additional sources of polluted runoff, including erosion, is addressed under Impacts 4.8-1 and 4.8-2 above. Further discussion regarding erosion is provided in Chapter 4.6, Geology and Soils, of this EIR.



Increases to peak runoff flows or volumes resulting from alterations to the existing drainage pattern of the site have the potential to result in exceedance of existing or planned stormwater drainage systems or flooding on- or off-site.

As discussed previously, runoff from impervious surfaces created as part of the proposed project would be routed to six new detention basins located adjacent to the RD 1000 ditches and canals that border the western and southern boundaries of the project site, and areas adjacent to the RD 1000 L Drain (which bisects the eastern portion of the project site). The basins would be connected to the RD 1000 system through weirs to meet the pre-project spill conditions and to provide on-site floodplain storage.

To assess the changes in runoff volumes from the project site that could occur due to the proposed project, Wood Rodgers calculated the pre- and post-construction water surface elevations (WSEs) at key locations within the project site's drainage shed. Pre- and post-construction WSEs are presented in Table 4.8-2 below. It should also be noted that peak flows within the West Drainage Canal downstream of the RD 1000 L Drain and West Drainage Canal confluence decrease slightly from pre-project to post-project conditions, from 465.5 cfs to 461.7 cfs. Water surface elevations within the connecting channel just upstream of Pumping Plant 3 also decrease from 13.789 feet to 13.764 feet, and water surface elevations within the channel upstream of Pumping Plant 5 decrease from 14.589 feet to 14.550 feet during post-project conditions. As shown in the table, the proposed project would result in reduced WSEs relative to existing conditions for the design-storm event (i.e., the 100-year storm event).

Therefore, the proposed project would be consistent with applicable hydromodification requirements, and would not increase the rate or amount of runoff leaving the project site during the design storm event. In addition, as noted in the Preliminary Drainage Report, the post-project condition provides more storage than is required, pumping 35 cfs into the RD 1000 system while maintaining peak on-site water surface elevations below the RD 1000 channel system peak water surfaces, which overflow into on-site detention.

An exhaustive evaluation to determine the exact peak pumping rate that would create an increase in the RD 1000 system was not conducted as part of the Preliminary Drainage Report; however, pumping may be determined to exceed 35 cfs during final design, making the on-site detention system operate even more effectively. Increased pumping could potentially allow for a smaller detention volume after final design features, such as inlet/outlet access ramps and encroachments, are fully accounted for during the improvement plan process.

It should also be noted that while the worst case 100-year flooding in the RD 1000 system occurs during a 10-day duration storm event, different parts of the system may behave differently under shorter duration rainfall conditions. As such, Wood Rogers also evaluated the drainage system during 100-year, 24-hour rainfall conditions to verify whether the higher intensity rainfall patterns occurring in a 24-hour duration storm would produce a higher on-site peak condition in the detention basin system. Based on the Wood Rogers analysis, while the RD 1000 system would still produce elevated channel levels high enough to spill into the project site during the 100-year 24-hour event, the resulting peak stage in the proposed on-site detention basin would



be 11.2 feet, which is more than 2.6 feet lower than the peak stage during the 10-day storm event. Finally, the outflow that would occur during post-project conditions closely mirrors the existing conditions of the project site. Thus, the proposed drainage system would not result in extensive period of standing water in the basins.

| Table 4.8-2 Pre- and Post-Project Peak Flow Elevations | | | | | |
|---|------------------------|-------------------------------------|--------------------------------------|-------------------------------------|--------------------------------------|
| Location | Model Node Name | COSD | | NAVD 88 | |
| | | Pre-Project Model WSE (feet) | Post-Project Model WSE (feet) | Pre-Project Model WSE (feet) | Post-Project Model WSE (feet) |
| Western Development Storage Node | 1132 | 12.201 | 11.86 | 14.182 | 13.841 |
| Northern Portion of Eastern Development Storage Node | Proposed Development | - | 11.903 | - | 13.884 |
| Patel, Isgur, Campbell, and Caltrans Remnant | Node 317 | - | 11.861 | - | 13.842 |
| Cayocca Storage Node | 11215 | 12.209 | 12.052 | 14.19 | 14.033 |
| RD 1000 L Drain – Downstream of I-5 | 11536 | 12.579 | 12.353 | 14.56 | 14.334 |
| RD 1000 L Drain – New Node to Connect New Pump to the RD 1000 L Drain | Node 316 | - | 12.071 | - | 14.052 |
| RD 1000 L Drain – New Node to Connect Eastern Development to the RD 1000 L Drain | Node 314 | - | 12.066 | - | 14.047 |
| RD 1000 L Drain and West Drainage Canal Confluence | 167 | 12.198 | 11.986 | 14.179 | 13.967 |
| West Drainage Canal and Reach 6 Confluence | 1103 | 12.219 | 12.018 | 14.2 | 14.002 |
| West Drainage Canal – Node to Connect Western Development and West Drainage Canal | 166 | 12.198 | 11.972 | 14.179 | 13.953 |
| West Drainage Canal - Upstream of Del Paso Road | 11013 | 12.071 | 11.878 | 14.052 | 13.862 |

Source: Wood Rodgers, 2023.

Based on the above, the proposed project would result in a **less-than-significant** impact related to substantially altering the drainage pattern of the site or area, or increasing the rate or amount of surface runoff.



Mitigation Measure(s)

None required.

4.8-5 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 impede or redirect flood flows, or in flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation. Based on the analysis below and with implementation of mitigation, the impact is less than significant.

Given that both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to impede or redirect flood flows or risk release of pollutants due to project inundation. Because the proposed off-site force main, including each of the three potential force main segment options, would be installed either in existing roadway ROW or in other previously disturbed areas, the proposed off-site force main would not substantially alter the existing drainage pattern of the off-site force main alignment.

Industrial Park and Nonparticipating Parcels

The project site is not located in a tsunami or seiche zone. Therefore, impacts related to tsunamis and seiches are not discussed further. Rather, the following discussion is focused on potential impacts related to flooding and flood hazards.

As discussed above, and shown in Figure 4.8-2, the entirety of the project site is located within Zone A, which is designated as a SFHA. However, due to levee improvements, portions of the Natomas Basin are now classified as A-99 flood zones, including the eastern portion of the project site. A-99 is an interim designation that allows new development to proceed without elevation verification while the improvements needed to provide 100-year protection are under construction. Nonetheless, the A-99 flood zone is still a SFHA until construction of the levees is complete, and the levees are certified by FEMA. In addition, given that the majority of the project site is classified as Zone A, FEMA requires a more detailed local drainage assessment to remove the site from the SFHA, in addition to addressing the levee flooding issues.

Because the project site is located within a SFHA, the site must be raised above the existing 100-year floodplain. Pursuant to Section 15.104.050 of the City's Municipal Code, new construction is required to place the lowest floor of structures at least one foot above the base flood elevation. In addition, Section 11 of the City's Design and Procedure Manual requires the new construction place the lowest floor of structures at least one foot above the overland release path. Figure 4.8-3 provides a grading cross-section that illustrates the relationship between the 100-year WSE in the off-site RD 1000 canals, the detention basins, public roadways, parking, and industrial warehouse building elevations. As shown therein, the proposed project would raise



the building pads above the 100-year base flood elevation, in compliance with Section 15.104.050.

Furthermore, as discussed in Impact 4.8-4, Wood Rodgers has confirmed that the proposed project would result in reduced WSEs relative to existing conditions for the design storm event. Therefore, the proposed project would be consistent with applicable hydromodification requirements, and would not increase the rate or amount of runoff leaving the project site during the design storm event, or increase the base flood elevation off-site as a result of on-site grading. Because pre-development and post-development flows associated with the project site would be the same, the proposed project would not have the potential to impede or redirect flood flows.

With respect to risking release of pollutants due to project inundation, the future tenants of the proposed industrial buildings are not currently known, a large segment of the current retail market consists of regional suppliers, such as Amazon and Walmart, that deliver goods directly to consumers. As such, a strong need exists for light industrial warehousing to act as fulfillment centers for regional retailers. Operations associated with the proposed project would be typical of other warehouses in the City. In addition, as discussed in Chapter 4.7, Hazards and Hazardous Materials, of this EIR, while not currently anticipated, in the event that future operations associated with the proposed warehouses involve the routine use, transport, or disposal of hazardous materials, such materials would be safely managed in accordance with applicable regulations and would be subject to City review depending on the type or quantity of chemicals proposed for use. Chapter 8.64 of the City's Municipal Code requires that any use of hazardous materials be disclosed to the City's fire department. In addition, Chapter 8.60 of the City's Municipal Code includes regulations regarding hazardous materials cleanup, in the event that any hazardous substance or waste is unlawfully released, discharged, deposited, or abandoned upon or into any property, water, or facilities within the City. Furthermore, all stormwater exiting the project site would be directed to on-site stormwater quality features to ensure that any pollutants entrained within stormwater from the project site are removed prior to discharge.

Considering the above, the proposed project is not anticipated to result in the impediment or redirection of flood flows such that on- or off-site structures would be exposed to flood risk. However, a Conditional Letter of Map Revision (CLOMR) would be required prior to grading permit approval in order to ensure the project's compliance with existing regulations. Therefore, in the absence of a CLOMR submitted to FEMA, a **significant** impact could occur related to alteration of the existing drainage pattern of the site or area, including through alteration of a course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

Mitigation Measure(s)

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

- 4.8-5 *Prior to approval of any grading permits, the applicant shall obtain from the Federal Emergency Management Agency (FEMA), a Conditional*



Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area, if required. A copy of the letter shall be provided to the Engineering Services Division. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the City Engineer prior to acceptance of grading permits as complete.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

For further detail related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections of this EIR. The cumulative setting for impacts related to hydrology and water quality would be the RD 1000 drainage area identified within the Preliminary Drainage Study.

4.8-6 Cumulative impacts related to the violation of water quality standards or waste discharge requirements, and impacts resulting from the alteration of existing drainage patterns. Based on the analysis below, the cumulative impact is *less than significant*.

Given that both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to result in cumulative impacts related to the violation of water quality standards or waste discharge requirements, and impacts resulting from the alteration of existing drainage patterns.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

As noted previously, the project site is located within the Natomas Basin. The Natomas Basin comprises approximately 50,000 acres. In the vicinity of the project site, RD 1000 owns and operates the existing canals and pumping plants that move storm drainage from the local area to the Sacramento River. RD 1000 collects all runoff within the Natomas Basin through a system of interconnected channels and directs this runoff to pumping plants in order to lift the water into the leveed rivers and channels surrounding Natomas.

Currently, the Natomas Basin includes existing development, as well as various open space and agricultural areas in the project vicinity. However, the potential exists for new development to occur within the basin area. Runoff from new construction sites within the watersheds could carry sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of building products, which could result in water quality degradation if runoff containing such



sediment or contaminants should enter receiving waters in sufficient quantities. Furthermore, cumulative development within the watershed has the potential to create new impervious surfaces, thereby increasing the stormwater runoff rates and volumes within the RD 1000 channels, and, ultimately the Sacramento River.

Nonetheless, similar to the proposed project, any future development in the project area would be required to comply with Section 11 of the Development Standards, and Chapter 15.88 of the Sacramento City Code, as described above. In addition, BMPs would be required to be designed in accordance with the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction and for New Development/Redevelopment and Section 11 of the Development Standards (or other similar source as approved by the City), and cumulative development would also be required to comply with the Central Valley RWQCB requirements, including, but not limited to, the NPDES Construction General Permit, NPDES Municipal Stormwater Permits, Industrial Stormwater General Permits, and any necessary Clean Water Act Section 401 and 404 Permits, and Dewatering Permits. Thus, all future development would be required to include appropriate site design measures, source controls, and hydraulically-sized stormwater treatment and flow control measures to limit post-development runoff rates and amounts to below pre-development levels. As such, cumulative impacts to hydrology and water quality would be less than significant.

As discussed in Impacts 4.8-1 through 4.8-5 above, all identified impacts associated with the proposed project, including future development of the nonparticipating parcels, would be reduced to less-than-significant levels with implementation of the mitigation measures set forth herein. Therefore, the cumulative impact would be considered ***less than significant***.

Mitigation Measure(s)

None required.



4.9 LAND USE AND PLANNING/ POPULATION AND HOUSING

4.9 LAND USE AND PLANNING/ POPULATION AND HOUSING

4.9.1 INTRODUCTION

The purpose of this Land Use and Planning/Population and Housing chapter of this EIR is to examine the proposed project's compatibility with existing land uses in the area and to identify any incompatibilities with applicable land use plans, policies, and regulations adopted by the City for the purpose of avoiding environmental effects, including the City of Sacramento 2040 General Plan,¹ the City of Sacramento 2040 Master EIR (MEIR),² the City of Sacramento Housing Element,³ the City of Sacramento Planning and Development Code (Title 17), the Sacramento Area Council of Governments (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS),⁴ the Sacramento Local Agency Formation Commission (LAFCo) Change of Organization Policies and Procedures,⁵ and the Sacramento International (SMF) Airport Land Use Compatibility Plan (ALUCP).⁶

This chapter also includes discussion of the potential for the proposed project to induce substantial population growth in the project area, either directly or indirectly. The reader is referred to the various environmental resource evaluations presented in the technical chapters of this EIR for a discussion of potential physical/environmental effects that may result from the proposed land use changes.

As described further in Chapter 3, Project Description, of this EIR, the 474.4-acre project site is divided into two portions: the industrial park (353.5 acres), which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels (83 acres), primarily located in the southeastern portion of the overall site. The project site also includes 37.9 acres of Caltrans I-5 fee title right-of-way (ROW), which would not be developed as part of the proposed project.

While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

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

² City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.

³ City of Sacramento. *City of Sacramento 2021-2029 Housing Element*. Adopted August 17, 2021. Amended December 14, 2021.

⁴ Sacramento Area Council of Governments. *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy*. November 18, 2019.

⁵ Sacramento Local Agency Formation Commission. *Sacramento LAFCo Policy, Standards, and Procedures Manual*. Available at: <https://saclafco.saccounty.gov/PolicyStandardsandProceduresManual/Pages/TOC.aspx>. Accessed January 2023.

⁶ Sacramento Area Council of Governments. *Sacramento International Airport Land Use Compatibility Plan*. Adopted December 12, 2013.



4.9.2 EXISTING ENVIRONMENTAL SETTING

This section describes the existing land uses on the project site, including the industrial park portion and the nonparticipating parcels, and within the surrounding area, as well as the existing plans and policies that guide the development of the project site. In addition, the Existing Environmental Setting section describes current population and housing trends in the project region.

Project Site Characteristics and Surrounding Land Uses

The 474.4-acre project site is currently located within the Natomas area of unincorporated Sacramento County, west of the City of Sacramento limits, and southeast of the intersection of Interstate 5 (I-5) and Power Line Road (see Figure 3-1 Regional Location Map and Figure 3-2 Project Site Boundaries, in Chapter 3 of this Draft EIR). The City limits currently make up the project's northeastern and eastern boundaries. The project site is situated outside of the City of Sacramento's SOI and is identified by Sacramento County Assessor's Parcel Numbers (APNs) 225-0020-010, -016, -017, -021, -022, -023, -024, -026, -027, -030, -032, -033, -034, and -035, as well as 225-0030-023, -024, -045, and -048.

Within the northern portion of the site, Bayou Way, a paved road consisting of two vehicle lanes, meanders in a west-to-east direction through the site. The project site currently consists of vacant, fallow agricultural land. The site was historically used as hay fields, with possible intermittent rice fields from 1937 until at least 2020. Unnamed drainage canals run roughly north-south in both the western and eastern portions of the site. Numerous unimproved dirt roads provide access to the interior of the project site, which is subdivided into multiple agricultural plots. The project site is currently not developed with residential development.

Surrounding existing land uses include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

Land Use Designations and Zoning Districts

The project site has a current Sacramento County land use designation of Agricultural Cropland. The project site is within the Sacramento County zoning district of Agricultural 80 (AG-80).

Land surrounding the project site to the north is designated as Intensive Industrial (INT-IND) by the Sacramento County General Plan and land surrounding the project site to the northeast is designated Parks and Recreation, Open Space, Neighborhood, and Commercial Mixed-Use by the City of Sacramento 2040 General Plan. The land surrounding the project site to the south is designated as Agricultural Cropland and the land surrounding the project site further to the east is designated as Public/Quasi-Public by the Sacramento County General Plan. The land surrounding the project site to the east is designated as Neighborhood (N), Commercial Mixed-Use (CMU), Employment Mixed-Use (EMU), Parks and Recreation (PR), and Open Space (OS) by the City of Sacramento 2040 General Plan.

Table 4.9-1 below provides a summary of the current land use designations and zoning districts of the properties surrounding the project site.



Land Use Designation Definitions

The following section provides definitions of the land use designations noted above, as summarized from the City of Sacramento 2040 General Plan and the Sacramento County General Plan.

| Table 4.9-1 Summary of Adjacent General Plan Land Use Designations and Zoning Districts | | | | | |
|--|--|--|--|---|--|
| Relationship to Project Site | Present Land Use | City of Sacramento Land Use Designation | Sacramento County Land Use Designation | City of Sacramento Zoning District | Sacramento County Zoning District |
| North of the Project Site | Metro Air Park, Amazon Fulfillment Center, and Single-Family Residences | N; CMU; PR; and OS | Intensive Industrial and Agricultural Cropland | Standard Single Family (R-1); Single Family Alternative (R-1A); Multi-Family (R-2B); Multi-Family (R-3); Multi-Family Alternative (R-3A); Limited Commercial (C-1); and Agriculture-Open Space (A-OS) | Special Planning Area (SPA) – Metro Air Park |
| South of the Project Site | West Drainage Canal, Agricultural and Open Space Land, and Paso Verde K-8 School | N/A | Agricultural Cropland; Agricultural Cropland Combining Resource Conservation Area; and Natomas Joint Vision Area Overlay | N/A | AG-80 |
| East of the Project Site | Self-Storage Facility and Single-Family Residences | N; CMU; EMU; PR; and OS | N/A | R-1; R-1A; Multi-Family, up to 17 units/acre (R-2A); R-3; General Commercial (C-2); Shopping Center (SC); and A-OS | N/A |
| West of the Project Site | Agricultural Land | N/A | Agricultural Cropland and Public/Quasi Public | N/A | Agricultural – 20 acres (AG-20) |



City of Sacramento 2040 General Plan

The City of Sacramento 2040 General Plan provides land use designations for all land uses within the City of Sacramento, as well as those within the City's SOI. The City defines the N, CMU, EMU, PR, and OS land use designations as follows:

Neighborhood (N)

The N land use designation applies throughout Sacramento's established residential neighborhoods and in newly annexed areas in the north of the city where primarily residential development is planned. The N land use designation is intended to maintain and enhance livability and sense of place. The N land use designation is primarily comprised of residential uses, with some complementary neighborhood-serving commercial and public uses. Allowable uses include detached and attached residential dwelling units; neighborhood support uses (schools, parks, libraries, community centers, and care facilities); neighborhood-serving commercial and employment uses like corner markets, coffee shops, hair salons, shops, gyms, and fitness centers; office uses; assembly facilities; and compatible public and quasi-public uses.

Commercial Mixed-Use (CMU)

The CMU land use designation is intended to foster vibrant retail and commercial centers of varying scales throughout the community. The CMU land use designation applies to existing regional, community, and neighborhood shopping centers and provides for their redevelopment with a wide range of commercial and/or residential uses to complement existing development. Allowable uses include a full range commercial uses, including retail, dining, entertainment, offices, lodging, recreational, and cultural facilities, as well as attached residential dwelling units and compatible public, quasi-public, and special uses.

Employment Center Mixed-Use (EMU)

The EMU land use designation is intended to buffer residential uses from more intense industrial and service commercial activities and to provide compatible employment uses near higher-density and mixed-use housing. The EMU land use designation provides for a range of light industrial and high technology uses. The EMU land use designation generally applies to industrial areas that are next to residential neighborhoods, including McClellan Airfield Pell-Main Industrial Park, Cannon Industrial Park, and portions of the Sacramento Railyards, River District, and the Power Inn Business Improvement District. Allowable uses include light/advanced manufacturing, production, distribution, repair, testing, printing, research, and development; service commercial uses that do not generate substantial noise or odors; accessory office uses; and retail and service uses that provide support to employees. Other allowable uses include compatible residential uses such as live-work spaces or employee housing; hotels and motels; care facilities; assembly facilities; and compatible public and quasi-public uses.

Parks and Recreation (PR)

The PR land use designation includes parkways, public parks, and other areas primarily used for recreation. Typically, these areas are characterized by a high degree of managed green space and a limited number of buildings. Recreational facilities in the PR land use designation frequently include sports fields, playground equipment, picnic areas, sitting areas, concession businesses, open turf and natural areas, trails, and golf courses. Allowable uses include parks (neighborhood, community, and regional parks); parkways and trails; golf courses, and commercial recreation facilities; and compatible public and quasi-public uses.



Open Space

The OS land use designation includes areas that are intended to remain open with limited or no development, including largely unimproved open spaces used primarily for passive recreation, resource protection, and/or hazard avoidance. The OS land use designation is intended to preserve natural features, establish quality living environments, and maintain boundaries and buffers between communities and incompatible uses. Allowable uses include natural underdeveloped parks; woodland preserves; habitat and wetlands; agriculture; floodplains; areas with permanent open space easements; buffers between urban areas; and compatible public and quasi-public uses.

Sacramento County General Plan

The County defines the Intensive Industrial, Agricultural Cropland, Agricultural Cropland Combining Resource Conservation Area, Natomas Joint Vision Area Overlay, and Public/Quasi-Public land use designations as follows:

Intensive Industrial

The Intensive Industrial land use designation allows for manufacturing and related activities including research, processing, warehousing, and supporting commercial uses, the intensive nature of which require urban services. Intensive Industrial areas are located within the urban portion of the county and receive an urban level of public infrastructure and services. FARs range from 0.15 to 0.80.

Agricultural Cropland

The Agricultural Cropland land use designation represents agricultural lands most suitable for intensive agriculture. The agricultural activities included are row crops, tree crops, irrigated grains and dairies. The Agricultural Cropland land use designation is generally limited to areas where soils are rated from Class I to Class IV by the Soil Conservation Service, or are classified Prime, Statewide, or Unique significance by the State of California Conservation Department. These lands have at least some of the following attributes: deep to moderately deep soils, abundant to ample water supply, distinguishable geographic boundaries, absence of incompatible residential uses, absence of topographical constraints, good to excellent crop yields, and large to moderate sized farm units. These attributes indicate the need for ambitious preservation policies and techniques. The Agricultural Cropland land use designation allows single family dwelling units at a density no greater than 40 acres per unit.

Resource Conservation Area

The purpose of the Resource Conservation Area combining land use designation is to identify areas with special resource management needs. The Resource Conservation Area land use designation targets certain natural resources as being important on the Land Use Diagram while recognizing the validity of the underlying land use designation. The intent is to develop programs and incentives to assist landowners with resource protection and enhancement. Compliance with the Resource Conservation Area land use designation will rely on the voluntary support of landowners who seek cooperative conservation agreements with the County. The Resource Conservation combining land use category may be combined with Recreation, Natural Preserve, Agricultural Cropland, AG-20, and AG-80 land use designations in suitable areas outside the Urban Service Boundary (USB). Resource Conservation areas address vernal pools, wetland creation, waterfowl management, peat soil conservation, and Blue Oak woodland harvesting.



Natomas Joint Vision Area Overlay

On December 10, 2002, the Sacramento City Council and Board of Supervisors adopted a Memorandum of Understanding (MOU) outlining principles of land use and revenue sharing between the City and County of Sacramento for the Natomas area, setting the stage for what has come to be known as the “Natomas Joint Vision.” The Natomas Joint Vision Area overlay on the County’s General Plan land use diagram indicates the area addressed by this MOU. The cooperative effort addresses land use, economic development, and environmental opportunities and challenges in Natomas. The goal of the MOU and related efforts is high quality development balanced with permanent open space preservation systems.

SACOG’s Blueprint shows significant development in the Natomas Joint Vision Area. Because of the MOU, the Blueprint and the importance of the Natomas Joint Vision Area to the region, the County anticipates development in portions of the Natomas Basin within the timeframe of the General Plan. The project site is located within the Natomas Joint Vision Area. Therefore, subject to the preparation and certification of the appropriate environmental documentation, development of the proposed project in the Natomas Joint Vision Area shall be accomplished by approval of an SOIA.

Public/Quasi-Public

The Public/Quasi-Public land use designation establishes areas for uses such as education, solid and liquid waste disposal, and cemeteries. The Public/Quasi-Public land use designation identifies public and quasi-public areas that are of significant size, under County jurisdiction, regional in scope, specified by State law, or have significant land use impacts.

Zoning District Definitions

The following sections provide definitions of the zoning districts noted above, as summarized from the City of Sacramento Planning and Development Code (Title 17 of the City Code) and the Sacramento County Zoning Code.

City of Sacramento Zoning Code

The City defines the R-1, R-1A, R-2A, R-2B, R-3, R-3A, C-1, C-2, SC, and A-OS zoning districts as follows:

Standard Single Family (R-1)

The purpose of the R-1 zoning district is to accommodate low-density residential uses composed of single-unit detached residences and duplex dwellings on corner lots. The R-1 zoning district may also include recreational, religious, and educational facilities as the basic elements of a balanced neighborhood. Allowable uses include, but are not limited to, single-unit dwellings; duplexes; model home temporary sales offices; community markets; community gardens; market gardens; and commercial solar energy systems.

Single Family Alternative (R-1A)

The purpose of the R-1A zoning district is to permit single-unit or duplex dwellings, whether attached or detached, at a higher density than is permitted in the R-1 zone. Dwellings that do not have interior side yards, such as townhouses and rowhouses, are allowed. The uses allowed in the R-1 zoning district are also allowed in the R-1A zoning district.



Multi-Family, up to 17 units/acres (R-2A)

The purpose of the R-2A zoning district is to permit garden apartments and cluster housing. The R-2A zoning district is regulated to minimize the ground area covered by structures and maximize open space. The uses allowed in the R-1 zoning district are also allowed in the R-2A zoning district, as well as multi-family dwellings.

Multi-Family (R-2B)

The purpose of the R-2B zoning district is to accommodate broader density flexibility as a transition from the garden-apartment setting to a more traditional apartment setting. The uses allowed in the R-2A zoning district are also allowed in the R-2B zoning district.

Multi-Family (R-3)

The purpose of the R-3 zoning district is to accommodate traditional types of apartments. The R-3 zoning district is located outside the central city, serving as a buffer along major streets and near shopping centers. The uses allowed in the R-2A zoning district are also allowed in the R-3 zoning district, as well as dormitories.

Multi-Family Alternative (R-3A)

The purpose of the R-3A zoning district is to accommodate higher density development in the central city, along major commercial corridors, and in areas near major institutions and public transit facilities. The uses allowed in the R-3 zoning district are also allowed in the R-3A zoning district.

Limited Commercial (C-1)

The purpose of the C-1 zoning district is to provide for certain offices, retail stores, and commercial service establishments that are compatible with residential developments. The C-1 zoning district is intended to be applied to small lots that are surrounded by a residential neighborhood. Allowable uses, include, but are not limited to, single-unit dwellings; multi-unit dwellings; childcare centers; commercial services; non-commercial care facilities; offices; restaurants; retail stores; schools for dance, music, art, and martial arts; and community gardens.

General Commercial (C-2)

The purpose of the C-2 zoning district is to provide for the sale of goods; the performance of services, including repair facilities; office uses; dwellings; small wholesale stores or distributors; and limited processing and packaging. Allowable uses, include, but are not limited to, single-unit dwellings; multi-unit dwellings; residential care facilities; cinemas; commercial services; non-residential care facilities; offices; restaurants; retail stores; veterinary clinics; cannabis manufacturing and testing; and community gardens.

Shopping Center (SC)

The purpose of the SC zoning district is to provide a wide range of goods and services to the community. However, general commercial uses that are incompatible with a retail shopping center are prohibited. Allowable uses, include, but are not limited to, dormitories; multi-unit dwellings; residential care facilities; childcare centers; commercial services; hotels/motels; non-residential care facilities; offices; restaurants; retail stores; veterinary clinics; and community gardens.



Agriculture-Open Space (A-OS)

The purpose of the A-OS zoning district is to ensure the long-term preservation of agricultural and open space land. The A-OS zoning district is intended to prevent the premature development of land to urban uses. Allowable uses include, but are not limited to, farm worker housing; temporary commercial buildings; agriculture uses; community gardens; and solar energy systems.

Sacramento County Zoning

The County defines the AG-20, AG-80, and SPA – Metro Air Park zoning districts as follows:

Agricultural – 20 Acres (AG-20)

The AG-20 zoning district identifies land that is generally suitable for agricultural production with the specific intent to provide an opportunity for starter farms or large hobby farms. Much of the land in this category is classified as "statewide in significance", with soils generally in the class III and IV range. Approximately 30 percent of the land in this category is primarily suitable for grazing. The AG-20 zoning district allows single family dwelling units at a density no greater than 20 acres per unit. Uses other than agricultural production are not permitted in the AG-20 zoning district.

Agricultural – 80 Acres (AG-80)

The AG-80 zoning district identifies land that is generally used for agricultural purposes, but less suited for intensive agricultural than Agricultural Cropland. The minimum size allowable is 80 acres, large enough to maintain an economically viable farming operation. Typical farming activities include dry land grain, and irrigated and dry land pasture. Most soil classes range between IV and VI on the Soil Conservation Service scale. Constraints found in areas with this designation include shallow soils, uncertain water supply, moderate slopes, fair to poor crop yield, and farm unit fragmentation. Only agricultural production is permitted in areas with this designation. The AG-80 zoning district allows single family dwelling units at a density no greater than 80 acres per unit.

Special Planning Area (SPA) – Metro Air Park

SPAs impose a "special" set of development standards for select areas that have unique qualities or problems that cannot be adequately addressed by the County's Zoning Code. SPAs can tailor the Zoning Code to meet the needs of distinct districts, such as historic areas or main streets, or for areas subject to unique environmental conditions, such as steep slopes or flooding. SPAs may require more stringent development standards than the Zoning Code, or may actually relax such standards, depending upon the nature of the area in question. SPAs adapt the Zoning Code to effectively implement the policies of the County's General Plan in areas where the adopted Code is inappropriate.

Population and Housing

The City of Sacramento and Sacramento County's historical, current, and projected population and housing, as well as a discussion on employment and the jobs-to-housing ratio are provided below.

Historical and Current Population and Housing

According to the City's 2021-2029 Housing Element, between 2010 and 2021, Sacramento County experienced population growth, averaging approximately one percent for the entire County, including incorporated cities and unincorporated communities. As shown in Table 4.9-2, the population within the City of Sacramento limits has experienced a similar growth rate of one percent, increasing from 466,488 residents in 2010 to 518,161 residents in 2023.



| Table 4.9-2 City of Sacramento and Sacramento County Population and Household Growth | | | | |
|--|------|------------|------------|------------------------|
| Area | Year | Population | Households | Persons Per Households |
| City of Sacramento | 2010 | 466,488 | 174,624 | 2.67 |
| | 2023 | 518,161 | 202,406 | 2.56 |
| Sacramento County Unincorporated | 2010 | 554,554 | 219,621 | 2.53 |
| | 2023 | 598,519 | 223,328 | 2.68 |
| Sacramento County | 2010 | 1,418,788 | 523,538 | 2.71 |
| | 2023 | 1,572,453 | 588,934 | 2.67 |
| Source: | | | | |
| <ul style="list-style-type: none"> • California Department of Finance. <i>Report E-5: Population and Housing Estimates for Cities Counties and the State, January 1, 2011-2018, with 2010 Benchmark. Released May 1, 2018.</i> • California Department of Finance. <i>Report E-5: Population and Housing Estimates for Cities Counties and the State, January 2011-2021, with 2020 Benchmark. Released May 1, 2021.</i> • City of Sacramento. <i>City of Sacramento Housing Element 2021-2029 (Appendix H-1: Community Profile). December 2021.</i> • Sacramento County. <i>Sacramento County Housing Element of 2021-2019. March 8, 2022.</i> | | | | |

Average Household Size

The average size of households is a function of the number of residents living in households within a given area divided by the number of occupied housing units within the given area. As shown in Table 4.9-3, as of 2023, the average household size within the City is approximately 2.56 persons per household, which is slightly less than the household sizes within Sacramento County and the statewide average of 2.77 persons/household.

| Table 4.9-3 Average Household Size (Persons Per Household) | |
|--|------|
| Area | 2023 |
| California | 2.77 |
| Sacramento County | 2.67 |
| City of Sacramento | 2.56 |
| Source: California Department of Finance. Report E-5: Population and Housing Estimates for Cities Counties and the State, January 2011-2021, with 2020 Benchmark. Released May 1, 2021. | |

Projected Population and Housing Growth

As shown in Table 4.9-4, the City of Sacramento is projected to have a 27 percent increase in population from 466,488 residents in 2010 to 640,381 residents in 2035. As of 2023, the City of Sacramento has a total of 207,274 dwelling units, consisting of a mix of densities.⁷ While Table 4.9-2 and Table 4.9-4 demonstrate that growth within the City has not reached the maximum growth buildout estimates, development within the City is anticipated to continue to grow as new development occurs within the undeveloped areas of the City. SACOG has anticipated growth within the six-county Sacramento region through the 2020 MTP/SCS. According to the 2020 MTP/SCS, the City is anticipated to grow to a total of 260,410 housing units by 2035 and 267,970 housing units by 2040.⁸

⁷ California Department of Finance. *Report E-5: Population and Housing Estimates for Cities Counties and the State, January 2011-2021, with 2020 Benchmark.* Released May 1, 2021.

⁸ Sacramento Area Council of Governments. *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy – Appendix C: 2020 MTP/SCS Land Use Forecast.* November 18, 2019.



| Table 4.9-4 City of Sacramento Population Growth Projections | | | | |
|---|---------|---------|---------|-------------------------------|
| Area | 2010 | 2020 | 2035 | Percent Change (2010-2035) |
| Sacramento | 466,488 | 528,866 | 640,381 | 27% |
| <i>Source: City of Sacramento. City of Sacramento Housing Element 2021-2029 (Appendix H-1: Community Profile). December 2021.</i> | | | | |

Regional Housing Needs Plan

The Regional Housing Needs Allocation (RHNA) is a minimum projection of additional housing units needed to accommodate projected household growth of all income levels by the end of the housing element’s statutory planning period. Based on SACOG’s adopted RHNA, each city and county must update the housing element of their General Plan to demonstrate how the jurisdiction will meet the expected growth in housing need over the planning period.

According to the U.S. Department of Housing and Urban Development (HUD), housing is classified as “affordable” if households do not pay more than 30 percent of income for payment of rent (including utilities) or monthly homeownership costs (including mortgage payments, taxes, and insurance). SACOG adopted their current Regional Housing Needs Plan (RHNP) on March 20, 2020, which officially assigns the allocations to cities and counties in the six-county Sacramento region. SACOG’s RHNA covers the planning period from 2021 to 2029, and defines the income unit categories as follows:

- **Very Low-Income Unit:** is one that is affordable to a household whose combined gross household income is at or lower than 50 percent of the Sacramento County median income.
- **Low-Income Unit:** is one that is affordable to a household whose combined gross household income is at or between 50 and 80 percent of the Sacramento County median income.
- **Moderate Income Unit:** is one that is affordable to a household whose combined gross household income is at or between 81 and 120 percent of the Sacramento County median income.
- **Above Moderate Income Unit:** is one that is affordable to a housing whose combined gross household income is at or greater than 120 percent of the Sacramento County median income.

On November 21, 2019, the SACOG Board of Directors approved RHNA Methodology Option C for the RHNA Methodology Cycle 6 (2021 through 2029 planning period).⁹ This action provides the number of total housing units that each jurisdiction in the SACOG region must zone for during the eight-year period. Based on the approved RHNA Methodology Option C, the SACOG region requires a minimum of 38,999 new very low-income units and 23,503 new low-income units for the upcoming planning period.¹⁰ According to SACOG’s RHNP, the City of Sacramento’s RHNA number for combined low- and very-low-income levels is 16,769 dwelling units (see Table 4.9-5).¹¹

⁹ Sacramento Area Council of Governments. *Regional Housing Needs Allocation (RHNA)*. Available at: <https://www.sacog.org/regional-housing-needs-allocation-rhna>. Accessed June 2022.

¹⁰ Sacramento Area Council of Governments. *Regional Housing Needs Plan 2021-2029 – Appendix D: Draft RHNA Methodology Menu*. Adopted March 2020.

¹¹ Sacramento Area Council of Governments. *Regional Housing Needs Plan 2021-2029*. Adopted March 2020.



**Table 4.9-5
 City of Sacramento and Sacramento County Regional Housing Needs
 Allocations (2021-2029)**

| Jurisdiction | Total Units ¹ | Very Low Income | | Low Income | | Moderate | | Above Moderate | | Combined Low and Very Low | |
|--|--------------------------|-----------------|----|------------|------|----------|------|----------------|------|---------------------------|------|
| | | # | % | # | % | # | % | # | % | # | % |
| City of Sacramento Total | 45,580 | 10,463 | 23 | 6,306 | 13.8 | 8,545 | 18.7 | 20,266 | 44.5 | 16,769 | 36.8 |
| Sacramento County Unincorporated Total | 21,272 | 4,466 | 21 | 2,692 | 12.6 | 4,186 | 19.7 | 9,928 | 46.7 | 7,158 | 33.6 |

¹. Total number of units based on proportion of growth in SACOG's adopted 2020 MTP/SCS.

Source: Sacramento Area Council of Governments, Regional Housing Needs Plan. Adopted March 2020.

4.9.3 REGULATORY CONTEXT

The following is a description of environmental laws and policies that are relevant to the CEQA review process concerning land use and planning, as well as population and housing matters.

State Regulations

The following are applicable State regulations related to land use and planning/population and housing.

Title 14 California Code of Regulations Section 15131

Title 14, California Code of Regulations (CCR) Section 15131 provides that economic or social information may be included in an EIR, but those economic or social effects shall not be considered significant effects on the environment. In an EIR, the lead agency is responsible for researching economic or social changes resulting from a project, which may eventually lead to physical changes in the environment. Such economic or social changes can be used to determine the significance of physical changes on the environment.

Regional Housing Needs Plan

California General Plan law requires each city and county to have land zoned to accommodate a fair share of the regional housing need. The share is known as RHNA and is based on a RHNP developed by councils of government. The state-mandated RHNA process (Government Code Sections 65580 et seq.) requires SACOG to develop a methodology that determines how to divide and distribute an overall allocation that the region receives from the State.

Senate Bill 330

California Senate Bill (SB) 330, "The Housing Crisis Act of 2019," was signed into law by Governor Newsom on October 9, 2019 and became effective January 1, 2020. The bill establishes a statewide housing emergency to be in effect until January 1, 2025. During the housing emergency period, cities and localities in urban areas, including the City of Sacramento, are generally prohibited from rezoning actions or imposing new development standards that would reduce the zoned capacity for housing, or adopting new design standards that are not objective. In such jurisdictions, the demolition of existing housing units is only permitted if replacement units are



provided. The demolition of existing low-income units is only permitted if certain conditions related to affordability and tenant protections are met.

Local Regulations

The following are the local regulations and standards relevant to the CEQA review process with respect to land use and planning/population and housing. Specific goals and policies from the City of Sacramento 2040 General Plan and the SMF ALUCP are listed in Table 4.9-7 at the end of this chapter.

City of Sacramento 2040 General Plan

Specific goals and policies from the City of Sacramento 2040 General Plan related to land use and planning/population and housing are listed in Table 4.9-7 at the end of this chapter and are discussed at length.

Sacramento Area Council of Governments

SACOG is responsible for the preparation of, and updates to, the MTP/SCS for the region and the corresponding Metropolitan Transportation Improvement Program (MTIP). The MTIP identifies short-term projects (seven-year horizon) in more detail.

Metropolitan Transportation Plan/Sustainable Communities Strategy

The 2020 MTP/SCS was adopted by the SACOG board on November 18, 2019.¹² The MTP/SCS is a long-range plan for transportation improvements in the region and provides a 20-year transportation vision and corresponding list of projects. The plan is based on projections for growth in population, housing, and jobs.

SACOG determines the regional growth projections by evaluating baseline data (existing housing units and employees, jobs/housing ratio, and percent of regional growth share for housing units and employees), historic reference data (based upon five- and ten-year residential building permit averages and historic county-level employment statistics), capacity data (General Plan data for each jurisdiction), and current MTIP data about assumptions used in the most recent MTP/SCS. SACOG staff then meets with each jurisdiction to discuss and incorporate more subjective considerations about planned growth for each area. Finally, SACOG makes a regional growth forecast for new homes and new jobs, based upon an economic analysis provided by a recognized expert in order to estimate regional growth potential based on market analysis and related economic data, which is incorporated into the MTP/SCS.

Airport Land Use Commission

The SACOG Board of Directors serves as the Airport Land Use Commission (ALUC) for Sacramento, Sutter, Yolo, and Yuba counties. The State Aeronautics Act (Public Utilities Code Sections 21670 et seq.), identifies the role and responsibilities of ALUCs in land use planning. The Act is intended to ensure that proposed land uses in areas around public-use airports are compatible with continued airport operations.

Sacramento International Airport Land Use Compatibility Plan

One of the ALUC's primary functions is to develop and adopt an ALUCP for each public-use airport within its jurisdiction. The ALUCP includes land use policies focused on four compatibility

¹² Sacramento Area Council of Governments. *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy*. November 18, 2019.



factors: safety, noise, airspace, and overflight. The Sacramento International Airport (SMF) ALUCP was adopted in December 2013.

The basic function of the SMF ALUCP is to promote compatibility between Sacramento International Airport and the surrounding land uses. The ALUCP establishes a set of compatibility criteria applicable to new development located within the Airport Influence Area established by the ALUCP. The ALUCP establishes zones regarding noise compatibility, safety compatibility, airspace protected, and overflight compatibility, and establishes criteria for land uses based on the zones that they are located in.

Sacramento Local Agency Formation Commission

Sacramento LAFCo is a State-mandated boundary commission responsible for coordinating logical and timely changes in local government boundaries. In consideration of proposals, the Commission observes four basic statutory purposes: the discouragement of urban sprawl, the preservation of open space and agricultural land resources, the efficient provision of government services, and the encouragement of orderly growth boundaries based upon local conditions and circumstances. LAFCo's powers, procedures, and functions are set forth in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, (Government Code Section 560000 et seq.).

The LAFCo is charged with applying the policies and provisions of the Cortese-Knox-Hertzberg Local Government Reorganization Act to its decisions regarding annexations, incorporations, reorganizations, and other changes of government organization. These standards have been adopted pursuant to the authority contained in the Cortese-Knox-Hertzberg Local Government Reorganization Act to assist in carrying out its provisions. Specifically, these standards are designed to:

1. Give applicants, for changes of organization, guidance as to the information the LAFCo needs to make appropriate determinations concerning their applications;
2. Provide applicants, for changes of organization, with explicit guidance as to the criteria the LAFCo will utilize in approving, disapproving, amending, or conditionally approving applications for changes of organization;
3. Ensure consistency in the LAFCo's decision-making;
4. Facilitate communication among local agencies in the region;
5. Provide elected officials, governmental staff, and members of the general public information and notice as to the standards and procedures that the LAFCo will utilize in evaluating applications; and
6. Minimize adverse social, economic and environmental impacts of growth.

The Sacramento LAFCo Policy, Standards, and Procedures Manual outlines the adopted specific standards for its action to ensure that it renders fair and consistent decisions for specific actions, such as annexations and detachments, in accordance with State law. The Sacramento LAFCo uses these specific standards, as well as the applicable policies and general standards, during its decision-making process. Specific goals and policies from Chapter V, Specific Standards by Type of Action, of LAFCo's Policy, Standards, and Procedures Manual are applicable to the proposed project are listed in Table 4.9-6.



4.9.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to land use, planning, population, and housing. A discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, a significant impact would occur if the proposed project would result in any of the following:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;
- Induce substantial 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); or
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (see Chapter 5, Effects Not Found to be Significant, of this EIR).

As noted above, issues related to whether the proposed project would result in the following impact is discussed in Chapter 5, Effects Not Found to be Significant, of this EIR:

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Method of Analysis

The following section analyzes the compatibility of the proposed project with surrounding land uses and compliance of the proposed project with adopted plans and policies, pursuant to Section 15125(d) of the CEQA Guidelines.

Land Use and Planning

This chapter analyzes the compatibility of the proposed project with surrounding land uses and compliance of the proposed project with adopted plans and policies. Environmental impacts resulting from the proposed project are discussed in the respective environmental categories. This discussion complies with Section 15125(d) of the CEQA Guidelines, which requires that EIRs discuss inconsistencies with adopted local plans as part of the environmental setting. The ultimate determination of consistency will be made by the Sacramento LAFCo and the City of Sacramento City Council.

Methods Related to Evaluating Potential Division of an Established Community

This EIR evaluates whether the proposed project has the potential to physically divide an established community. The evaluation considers the existing type and intensity of uses in the project vicinity and those proposed for the project site. The analysis assumes the construction and implementation of the proposed project within the existing environment to determine if the project would be compatible with the established community surrounding the project site.



Consistency with the Applicable Land Use Regulations

The proposed project is examined for consistency with the City of Sacramento 2040 General Plan and Sacramento LAFCo based on the relevant policies adopted for the purpose of avoiding or mitigating an environmental effect contained within this EIR. The project's consistency with the City of Sacramento Planning and Development Code and the SMF ALUCP is also discussed.

Population and Housing

The level of significance of the impacts related to population and housing is determined by evaluating whether the proposed project, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure), would induce substantial unplanned population growth in the project area.

Project-Specific Impacts and Mitigation Measures

The following discussion of land use, planning, population, and housing impacts is based on implementation of the proposed project unless otherwise noted.

4.9-1 Cause a significant environmental impact due to physically dividing an established community. Based on the analysis below, the impact is *less than significant*.

A project risks dividing an established community if the project would introduce infrastructure or alter land uses so as to change the land use conditions in the surrounding community, or isolate an existing land use. Currently, the project site is undeveloped. Surrounding existing land uses in the project area include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

Given that both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to physically divide an established community. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The proposed project would include development of an industrial park with up to 5,204,500 square feet (sf) of light industrial uses, approximately 98,200 sf of retail/highway commercial uses, and associated internal roadways and other improvements. In addition, the nonparticipating parcels, comprised of approximately 83 acres, would result in first tier entitlements for future industrial uses of approximately 1,404,800 sf.

As discussed in this chapter, the proposed project would be compatible with existing land uses in the project area and would not alter the existing general development trends in the area or isolate an existing land use. For example, the light industrial uses



are anticipated to be consistent with the distribution centers within the Metro Air Park north of I-5. Furthermore, the proposed project would not cut off any existing or proposed transportation route that provides connectivity in the area. Finally, although the proposed project would include installation of an off-site force main that would convey wastewater generated from the proposed uses to the 48-inch SacSewer North Natomas interceptor line in East Commerce Way, the force main would be sized to accommodate flows from the project site and would not change the land use conditions in the surrounding community or isolate an existing land use.

Based on the above, the proposed project would not physically divide an established community, and a ***less-than-significant*** impact would occur.

Mitigation Measure(s)

None required.

4.9-2 Cause a significant environmental impact due to a conflict with any Sacramento LAFCo plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Based on the analysis below, the impact is less than significant.

The proposed project's consistency with the Cortese-Knox-Hertzberg Local Government Reorganization and Sacramento LAFCo policies is discussed below. Given that the entire project site, including the industrial park portion and the nonparticipating parcels, would require LAFCo approval of a SOI Amendment and Annexation, the following discussion applies to the potential for both project components to conflict with any Sacramento LAFCo plan, policy, or regulation. In addition, the analysis considers conflicts associated with the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The project site is currently located within unincorporated Sacramento County and has a Sacramento County General Plan land use designation of Agricultural Cropland and is within the County zoning district of AG-80. The proposed project includes approval of an SOI Amendment, as the project site is currently situated adjacent to, but outside of, the City of Sacramento's SOI. The project application requires preparation of a Targeted Municipal Services Review as part of modifying the City's SOI to be coterminous with the boundaries of the project site, to evaluate adequacy of public services and utilities for the proposed Annexation. Following approval of the proposed SOI Amendment, the proposed project would then require Annexation of the site into the City of Sacramento boundaries, as well as Annexation into the SacSewer service area.

As part of LAFCo's review of the Annexation and SOIA requests, LAFCo is required to ensure that the proposed project would not cause a net loss of targeted housing resources on a countywide basis. Residential development does not currently exist at the project site and, based on the existing Sacramento County General Plan land use and zoning designations for the project site, residential development was not



anticipated at the project site. The existing land uses located east and northeast of the project site are generally developed with residential and commercial uses. The undeveloped areas surrounding the project site to the north, south, and west are designated for agricultural or industrial uses. As such, the surrounding area is not planned for additional residential uses and the proposed project would not prevent affordable housing from being developed in the project area. As outlined in Table 4.9-5, the City of Sacramento’s RHNA number for combined low- and very-low-income levels is 16,769 dwelling units. Based on the above, the proposed project would not impact the City’s ability to meet the required RHNA numbers for affordable housing.

Table 4.9-6 below lists the proposed project’s consistency with applicable Sacramento LAFCo policies related to land use and planning. The discussion in Table 4.9-6 evaluates the proposed Annexation of the 474.4-acre project site relative to the applicable Sacramento County LAFCo policies and standards regarding annexation, reorganization, and SOI Amendments, which are found in Chapter V of the Sacramento LAFCo Policy, Standards and Procedures Manual. Ultimately, the reorganization is a discretionary action by Sacramento LAFCo.

Policy compliance is often a matter of interpretation. The LAFCo commissioners are the ultimate arbiters of LAFCo policy for this project, and their judgment regarding the project and a specific policy may be different from that set forth in this report. Thus, the following policy evaluation should be viewed as preliminary, with the ultimate decision to be made by the appropriate appointed and elected officials.

| Table 4.9-6 Discussion of Relevant Sacramento LAFCo Policies | |
|--|--|
| Policy | Project Consistency |
| A. Annexations to Cities | |
| <p>1. LAFCo will utilize Spheres of Influence through application of the following standards:</p> <ul style="list-style-type: none"> a. The LAFCo will approve an application for annexation only if the proposal conforms to and lies wholly within the approved Spheres of Influence boundary for the affected agency; b. The LAFCo generally will not allow Spheres of Influence to be amended concurrently with annexation proposals; c. The LAFCo will favorably consider proposals that are a part of an orderly, phased annexation program by an | <ul style="list-style-type: none"> a. As part of the Annexation application process, a Targeted Municipal Services Review has been prepared as part of the proposed project to ensure the adequacy of public services and utilities to serve the project site. Following approval of the SOI Amendment, the project site would be located completely within the City of Sacramento’s SOI, which would then allow for Annexation. b. The City of Sacramento SOI would be amended prior to the application of Annexation into the City. c. The project site is located adjacent to the existing City of Sacramento limits. Following approval of the SOI Amendment, the project site would be |



**Table 4.9-6
 Discussion of Relevant Sacramento LAFCo Policies**

| Policy | Project Consistency |
|---|---|
| <p>agency for territory within its Sphere of Influence;</p> <p>d. An annexation must be consistent with a city's Sphere of Influence Plan; and</p> <p>e. The LAFCo encourages the annexation to each city of all islands of unincorporated territory and all substantially surrounded unincorporated areas located within the city's Sphere of Influence.</p> | <p>located completely within the City of Sacramento's SOI.</p> <p>d. A Targeted Municipal Services Review has been prepared as part of the Annexation application process. Following approval of the SOI Amendment, the project's request for Annexation into the City of Sacramento would be considered. The Targeted Municipal Services Review would allow for Sacramento LAFCo and the City of Sacramento to ensure the adequacy of public services and utilities to serve the project site.</p> <p>e. The northeastern and eastern boundaries of the project site are located adjacent to the current City of Sacramento limits and, following approval of a SOI Amendment, the project site would be located completely within the City of Sacramento's SOI. The proposed project includes seven non-participating properties to ensure logical boundaries and would not create unincorporated islands. The nonparticipating properties would receive General Plan and Rezoning designations as part of the proposed Annexation.</p> |
| <p>2. The LAFCo will not approve proposals in which boundaries are not contiguous with the existing boundaries of the City to which the territory will be annexed, unless the area meets all of the following requirements:</p> <p>a. Does not exceed 300 acres;</p> <p>b. Is owned by the City;</p> <p>c. Is used for municipal purposes; and</p> <p>d. Is located within the same county as the city.</p> | <p>The project site is located immediately west of the Sacramento City limits and is contiguous with the existing City boundaries.</p> |
| <p>3. The LAFCo will favorably consider proposals to annex streets where adjacent municipal lands will generate additional traffic and where there are isolated sections of county road that will result from an annexation proposal. Cities shall annex a roadway portion</p> | <p>The Annexation would result in the project site, which is located east of Power Line Road and south of I-5, becoming part of the City of Sacramento. In addition, the portion of Bayou Way, which traverses the project site would be abandoned and replaced with a new internal roadway system that would be</p> |



| Table 4.9-6 Discussion of Relevant Sacramento LAFCo Policies | |
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| Policy | Project Consistency |
| when 50 percent of the property on either or both sides of the street is within the City. | maintained by the City of Sacramento. Although an approximately 0.17-mile portion of Metro Air Parkway extends into the northern portion of the project site, because 50 percent of the project site is not located on either side of Metro Air Parkway, the roadway would not be maintained by the City of Sacramento. |
| 4. The LAFCo will favorably consider annexations with boundary lines located so that all streets and rights-of-way will be placed within the same city as the properties which either abut thereon or for the benefit of which such streets and rights-of-way are intended. | The proposed project is bordered by Power Line Road to the west and I-5 to the north. In addition, Bayou Way traverses the project site and a portion of Metro Air Parkway extends into the northern portion of the project site. Bayou Way would be maintained the City of Sacramento; however, as discussed above in response to Policy A-3, Metro Air Parkway would be maintained by Caltrans. |
| 5. An annexation may not result in islands of incorporated or unincorporated territory or otherwise cause or further the distortion of existing boundaries unless it is determined that the annexation as proposed is necessary for orderly growth, and cannot be annexed to another city or incorporated as a new city. Annexations of territory must be contiguous to the annexing city. Territory is not contiguous if its only connection is a strip of land more than 300 feet long and less than 200 feet wide. | The project site is located immediately west of the existing Sacramento City limits and the proposed project would not result in islands of incorporated or unincorporated territory. |
| 6. The LAFCo opposes extension of services by a City without annexation, unless such is by contract with another governmental entity or a private utility or as otherwise in compliance with Government Code Section 56133. | The extension of services resulting from the proposed project would be part of the Annexation process and not involve an out of agency services agreement as defined by Government Code Section 56133. |
| B. Annexations to Districts | |
| 1. The LAFCo will favorably consider proposals for districts to annex all developed urban land inside their Sphere of Influence and will ordinarily approve such proposals unless the residents and owners of the property being annexed demonstrate that such areas should not be annexed. | The proposed project would require approval of an SOI Amendment, which would amend the City of Sacramento's SOI to include the project site. The project site is currently undeveloped. Therefore, existing residents would not be annexed into the City of Sacramento as part of the proposed project. |
| 2. Updated Plan for Services, as defined in the policies, standards and procedures must be available before LAFCo will approve a proposal initiated by the district. | A Plan for Services have been prepared to ensure adequacy of public services and utilities to serve the project site and will be reviewed by LAFCo and the City of |



| Table 4.9-6 Discussion of Relevant Sacramento LAFCo Policies | |
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| Policy | Project Consistency |
| | Sacramento as part of the Annexation application process. |
| 3. The LAFCo opposes extension of services by a district without annexation, unless such extension is by contract with another governmental entity or a private utility or as otherwise in compliance with Government Code Section 56133. | The proposed project currently lies outside the Sacramento County USB. The USB and the City of Sacramento boundaries represent the limit of the Sacramento County service areas for SacSewer. As a result, the project site has not been included as a future area to be served in the master plans of the County of Sacramento or the City of Sacramento. However, following Annexation into the City, the project site would also be annexed into the service area for SacSewer, and service would be made available to the project. |
| C. Reorganization | |
| 1. LAFCo will strive to ensure that each separate territory included in the proposal, as well as affected neighboring residents, tenants, and landowners, receive services of an acceptable quality from the most efficient and effective service provider after the reorganization is complete. | As part of the project site's Annexation into the City of Sacramento, the project site would also be annexed into the service area for SacSewer, and service would be made available to the project site. Because SacSewer currently provides utility services in the vicinity of the project site, SacSewer would be able to efficiently and effectively extend services to the proposed project upon Annexation of the site. |
| 2. The service quality, efficiency and effectiveness available prior to reorganization shall constitute a benchmark for determining significant adverse effects upon an interested party. The LAFCo will approve a proposal for reorganization which results in this type of significant adverse effects only if effective measures are included in the proposal. | The City of Sacramento currently provides sufficient services to all properties within the existing City limits and would continue to provide equivalent if not greater service to the existing City and project site upon Annexation into the City of Sacramento. |
| I. Amendments to Spheres of Influence | |
| 1. The LAFCo will generally treat a proposed amendment to an agency's Sphere of Influence similarly to an application for approval of a Sphere of Influence. The LAFCo's policies will be applied to applications for amendment to a Sphere of Influence as if it were an annexation planned for the mid- to long-range future. For that reason, each of the following sets of policies will apply to applications for amendments to Spheres of Influence: a. General policies; | As detailed herein, the proposed SOI Amendment and Annexation would be generally consistent with applicable Sacramento LAFCo policies related to SOI Amendments, as Annexation would only occur after approval of the proposed SOI Amendment, extension of services to the project site would be completed only after approval of Annexation, the proposed project would not create an island of incorporated territory, and the quality of service from existing providers would not be deteriorated by the proposed project. Please see responses throughout Table 4.9-6 for further details on the proposed project's consistency |



**Table 4.9-6
 Discussion of Relevant Sacramento LAFCo Policies**

| Policy | Project Consistency |
|---|--|
| b. Specific policies and standards for annexations to cities and special districts; and c. Specific policies and standards for amendments to Spheres of Influence. | with applicable Sacramento LAFCo policies related to SOI Amendments and Annexations. |
| 2. The Sphere of Influence Municipal Services Review must be current before additions to a Sphere of Influence will be approved by LAFCo. | As part of the Annexation application process, a Targeted Municipal Services Review has been prepared and would be considered by Sacramento LAFCo and the City of Sacramento to ensure the adequacy of public services and utilities to serve the project site. |
| 3. The Sphere of Influence amendments shall precede applications for annexations. | Prior to Annexation of the project site into the City of Sacramento limits, the proposed project would require approval of a SOI Amendment to modify the City's SOI to include the project site. As part of the Annexation application process, a Targeted Municipal Services Review has been prepared and would be considered by Sacramento LAFCo and the City of Sacramento to ensure the adequacy of public services and utilities to serve the project site. |
| 4. Amendment proposals must be consistent with the updated Sphere of Influence and/or Municipal Services Review. | Please see response to Sacramento LAFCo Policy I-2. |
| 5. An applicant for an amendment to a Sphere of Influence must demonstrate a projected need or lack of need for service. | As discussed further in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, adequate water, wastewater, electrical, natural gas, and solid waste services are available to serve the project site, including adequate water supplies, wastewater treatment capacity, and landfill capacity. |
| 6. Amendment proposals involving Sphere expansion which contain prime agricultural land will not be approved by the LAFCo if there is sufficient alternative land available for annexation within the existing Sphere of Influence. | As discussed in Chapter 4.2, Agricultural Resources, of this EIR, Mitigation Measure 4.2-1 requires the preservation of off-site farmland at a ratio of one Farmland acre converted to urban land uses outside the Natomas Basin Habitat Conservation Plan (HCP) policy area to 0.5-acre preserved, which, combined with the biological resources mitigation required by Mitigation Measure 4.4-5(b), would result in an overall preservation at a 1:1 ratio. However, while Mitigation Measure 4.2-1 would preserve an equivalent acreage of Farmland elsewhere, the proposed project would result in the |



**Table 4.9-6
 Discussion of Relevant Sacramento LAFCo Policies**

| Policy | Project Consistency |
|--------|--|
| | <p>conversion of agricultural land to urban uses, and would not create new agricultural land. As such, the proposed project would lead to an overall loss of Farmland.</p> <p>However, the proposed project is sited on land in proximity to other similar industrial uses (the Metro Air Park and Amazon SMF-1 Fulfillment Center), and would not require major extension of public services and utilities, nor result in the deterioration of existing service levels of providers that would serve the project site. Furthermore, due to the built-out nature of the City of Sacramento, an alternate location within the City is not currently available to serve the proposed project. As discussed further in Chapter 6, Alternatives Analysis, of this EIR, the location that comes closest to feasibility is located northwest of the intersection of Fruitridge Road and South Watt Avenue in the southeast portion of the City, and contains a portion of land already designated for Industrial use by the Sacramento General Plan. However, in order to include a comparable amount of acreage to the proposed project, the alternative location would require the demolition of several commercial businesses, including, but not limited to, a building materials store, furniture store, and 7-Eleven convenience store. In addition, approximately 117 acres of the 354 acres required of the alternative would consist of land already set aside for L and D Landfill. Furthermore, buildout of the proposed project at the alternative location would require a General Plan Amendment (GPA) that would reduce the amount of land designated for residential development, as a portion of the site is currently designated Traditional Neighborhood Medium by the Sacramento General Plan. As such, buildout of the proposed project at an alternative location is infeasible. Furthermore, buildout of the site on alternative land outside, but adjacent to, the City's SOI would likely result in similar conversion of Farmland as the proposed project, given the prevalence of agricultural land adjacent to the City's SOI. Therefore, sufficient alternative land is not</p> |



| Table 4.9-6 Discussion of Relevant Sacramento LAFCo Policies | |
|---|--|
| Policy | Project Consistency |
| | available for Annexation within the City's SOI to accommodate the proposed project. |
| 7. A phased plan for annexation of Sphere of Influence territory should be included in the Sphere of Influence proposal. | The entire project site would be annexed into the City of Sacramento as part of the approved Annexation. As such, the proposed project would not include a phased plan for Annexation. |
| 8. No amendments to a Sphere of Influence Plan will be approved unless a Municipal Services Review of the Sphere of Influence Plan exists that has been prepared by a local agency and adopted by LAFCo if required. | The Municipal Services Review for the proposed project has been completed and complies with Sacramento LAFCo Policy I-8. |
| 9. The LAFCo will deny proposals that would result in significant unmitigable adverse effects upon other service recipients or other agencies serving the affected area unless the approval is conditioned to avoid such impacts. | As discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, impacts to public services and utilities as a result of the proposed project would be less than significant. |
| 10. The LAFCo will approve a proposed amendment to a Sphere of Influence only if the subject agency will be the most logical and prospectively most efficient provider of services to the subject territory. | The project site is contiguous to the City of Sacramento limits, which provides public services to the properties adjacent to the project site. Therefore, the City of Sacramento is the most logical and prospectively most efficient provider of services to the project site. |

The proposed project would require approval of a SOI Amendment and Annexation by Sacramento LAFCo. As discussed above, the SOI Amendment and Annexation of the project site appear to be generally consistent with the Sacramento LAFCo policies regarding land use and planning. Ultimately, the reorganization is a discretionary action by Sacramento County LAFCo. Therefore, there would be a **less-than-significant** impact in relation to conflicting with a Sacramento County LAFCo plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measure(s)

None required.

4.9-3 Cause a significant environmental impact due to a conflict with any City of Sacramento land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including without limitation the City of Sacramento 2040 General Plan. Based on the analysis below, the impact is *less than significant*.

The proposed project's consistency with the City of Sacramento 2040 General Plan is discussed below. The proposed project's consistency with the Cortese-Knox-



Hertzberg Local Government Reorganization Act and Sacramento LAFCo policies is discussed in Impact 4.9-2 above.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Given that the entire project site, including the industrial park portion and the nonparticipating parcels, would require City of Sacramento approval of a General Plan Amendment (GPA) and Rezoning, the following discussion applies to the potential for both project components to conflict with a City of Sacramento 2040 General Plan policy or regulation. Because installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway right-of-way (ROW) or in other previously disturbed areas, the proposed off-site force main alignment would be consistent with the City's intended uses for existing roadways. Thus, the proposed off-site force main would be consistent with the City of Sacramento 2040 General Plan.

General Plan Amendment

The General Plan Guidelines published by the State Office of Planning and Research defines consistency as, "An action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." Therefore, the standard for analysis used in this EIR is based on general agreement with the policy language and furtherance of the policy intent (as determined by a review of the policy context). The determination that the project is consistent or inconsistent with the City of Sacramento 2040 General Plan policies or other City plans and policies is ultimately the decision of the City Council.

Although the CEQA analysis may identify some areas of general inconsistency with City policies, the City has the ability to impose additional requirements or conditions of approval on a project, at the time of its approval, to bring a project into more complete conformance with existing policies.

A discussion of the project's general consistency with policy language and furtherance of policy intent is discussed in further detail below. In addition, Table 4.9-7 at the end of this chapter lists the proposed project's consistency with applicable City of Sacramento 2040 General Plan policies related to land use.

The project site is currently designated as Agricultural Cropland by the Sacramento County General Plan. The proposed project would require the amendment of the City's existing 2040 General Plan to include the boundaries of the industrial park footprint and nonparticipating parcels (totaling 414.3 acres –not including roadways) as Employment Mixed-Use to reflect and support the proposed land uses. The 353.5-acre industrial park portion of the proposed project would include development of an industrial park with up to 5,204,500 sf of light industrial uses and approximately 98,200 sf of retail/highway commercial uses. In addition, the proposed project would include development of 1,404,800 sf of future industrial uses on 83 acres. Thus, the proposed uses would be consistent with the City Sacramento 2040 General Plan proposed land use designation of Employment Mixed-Use. Without approval of the GPA, development of the proposed project would not be an allowable use on the project site.



The requested GPA is a policy issue under the purview of the Sacramento City Council. From a policy perspective, Table 4.9-7 at the end of this chapter demonstrates that the proposed project would be generally consistent with the policies in the City of Sacramento 2040 General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Should City Council approve the requested entitlements, the proposed project's impacts related to compliance with the City of Sacramento 2040 General Plan would be less than significant.

Prezoning

The project site is currently located within unincorporated Sacramento County and is within the County zoning district of AG-80. Upon Annexation to the City, to ensure compatibility with the City Sacramento 2040 General Plan land use designations for the site and consistent with the Cortese-Knox-Hertzberg Local Government Reorganization Act, the proposed project site would be Prezoned to include 317.9 acres of Industrial Planned Unit Development (M-1-PUD) zoning, 83 acres of M-1 zoning for the nonparticipating parcels, and 13.4 acres Highway Commercial PUD (HC-PUD) zoning (see California Government Code Section 56375). The proposed project would comply with all requirements in the Sacramento Planning and Development Code including, but not limited to, parking, setbacks, and landscaping. As a result, the project's impact related to compliance with the Sacramento Zoning Code would be less than significant.

Planned Unit Development

The development proposal includes the request for the approval of Planned Unit Development Guidelines and Schematic Plan from the City of Sacramento. As detailed in Sacramento City Code Section 17.452.010, the purpose of a PUD is to provide greater flexibility in the design of integrated developments than otherwise possible through strict application of zoning regulations. With respect to industrial development, a PUD allows for well-designed and controlled groupings of research, service, or light industrial uses within an area containing visual and operational amenities and features, such as selective occupancies, setbacks, landscaping, and bulk and building material controls.

The Airport South Industrial PUD Guidelines would modify the standards for the proposed project to allow for all uses permitted in the M-1 and HC zones with the exception of the following:

- Residential uses;
- Adult entertainment business;
- Laundromat, self-service;
- Mortuary, crematory, cemetery;
- Museum;
- Cannabis manufacturing, testing, dispensary;
- cannabis cultivation, distribution, manufacturing;
- Railroad right-of-way (ROW);
- Amusement center, outdoor;
- Bar, nightclub;
- Cardroom;
- College campus, school, K-12;



- Correctional facility;
- Drive-in theater;
- Golf Course, driving range;
- Gun range, rifle range;
- Veterinary clinic, veterinary hospital, kennel;
- Animal slaughter;
- Boat dock, marina;
- Heliport, helistop;
- Junk yard;
- Livestock yard;
- Solid waste landfill;
- Surface mining operations; and
- Wells, gas and oil.

The PUD Guidelines developed for the project site include design standards for site design, building design, landscaping, signage, and lighting. For example, the PUD Guidelines anticipate that the project site will be developed for tenants primarily focused on warehouse and distribution uses, light manufacturing and assembly, cold storage, and other uses as indicated in City of Sacramento Planning and Development Code Section 17.220, M-1 zone except for the non-permitted uses outlined above. While the PUD does not establish a minimum or maximum building size, it is anticipated that the building(s) within the M-1-PUD zoning district would be 500,000-sf or larger and would have one or more tenants. The maximum building height within the M-1-PUD would be 70 feet and the maximum building height for hotels in the HC-PUD zoning district would be 80 feet. Landscaping associated with development within the PUD would utilize native and drought tolerant species; vegetation would be compatible with airport overflight zones.

Conclusion

Following approval of an SOI Amendment and as part of Annexation of the project site into the City of Sacramento by the Sacramento LAFCo, the proposed project would require approval of a GPA, Rezoning, and a PUD by the City Council. As discussed further in Table 4.9-7, the proposed project would be consistent with the City of Sacramento 2040 General Plan and Planning and Development Code. Therefore, the proposed project would not cause a significant environmental impact due to a conflict with any applicable City of Sacramento land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including without limitation the City of Sacramento 2040 General Plan, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.



4.9-4 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure). Based on the analysis below, the impact is *less than significant*.

Growth can be induced in a number of ways, including through the elimination of obstacles to growth or through the stimulation of economic activity within the region. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped, or in areas not currently planned for development.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Given that both the industrial park and nonparticipating parcels would, with project approval, be developed with similar land uses on contiguous parcels, the following discussion describes potential effects related to direct and indirect population growth associated with implementation of the proposed project, including the industrial park and nonparticipating parcels. In addition, the analysis includes evaluation of the proposed off-site improvements.

Direct Population Growth

The proposed project would include development of a 353.5-acre industrial park and 98,200 sf of retail/highway commercial uses. Following approval of an SOI Amendment and Annexation into the City, the proposed project would require approval of Rezoning to include 317.9 acres of M-1-PUD zoning, 83 acres of M-1 zoning for the nonparticipating parcels, and 13.4 acres of HC-PUD zoning. In addition, the project would require an amendment to the City's existing 2040 General Plan to include 414.3 acres (not including roadways) of Employment Mixed-Use. The project site also includes several nonparticipating parcels, comprised of approximately 83 acres, which would require approval of a General Plan Amendment and Rezoning for future industrial uses of approximately 1,404,800 sf. The project site also includes 37.9 acres of Caltrans I-5 fee title ROW, which would not be developed as part of the proposed project.

Given that the proposed project would not create housing, the nature of the project would not directly induce population growth. While the project would provide space for new business, development would not necessarily induce unplanned population growth. As discussed further in Chapter 4.12, Transportation, of this EIR, based on assumptions used by DKS Associates, the transportation consultant for the proposed project, development of the project could generate a total of approximately 4,000 employees. While the project could indirectly attract residents to the area for employment opportunities, new employees would likely be drawn from current residents in the surrounding area.



Per the City's population projections, as presented in Table 4.9-4, the population is anticipated to increase from 2020 to 2035 by 111,515 (640,381 residents - 528,866 residents). Conservatively estimating that all permanent positions associated with the project would be filled by new residents to the Sacramento region and assuming that the proposed project would be fully built out and operating at full capacity by 2035, the project's contribution to the overall population increase by 2035 would be approximately 3.5 percent (4,000 new residents ÷ 111,515 residents). Thus, the increase in jobs would be relatively small compared to the City's existing and anticipated population levels.

The project site is located within the vicinity of existing residential land uses to the east and south, as well as the under-construction Northlake Subdivision to the north, across I-5. Furthermore, the Natomas community is a primarily residential area of the City and has numerous completed and planned subdivisions and apartment complexes within five miles of the project site. Thus, housing opportunities are available in the project area should employees need to relocate for new employment at the proposed development.

The primary consideration regarding increased growth is not the growth itself, but the effects of such growth on the City's infrastructure systems, with the key inquiry being whether the systems would become overburdened as a result of the additional demand created by the project. As discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, adequate utility infrastructure would be available to support the proposed project.

As discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, the Sacramento River Water Treatment Plant (SRWTP) is permitted to treat average day weather flow (ADWF) of 181 million gallons per day (mgd). Since the opening of the SRWTP, system improvements have been made to accommodate regional growth and to add capacity to the Sacramento Area Sewer District's (SacSewer) interceptor system. In 2014, the SRWTP's ADWF was approximately 141 mgd.

Although future growth in the SacSewer service area will increase demands for wastewater service and use the remaining capacity of the SRWTP, regional water conservation efforts have resulted in a reduction in water use, which has in turn, increased the available capacity at the SRWTP. For instance, SacSewer anticipates per capita water consumption to decline through the continued installation of water meters and water conservation measures. As such, a substantial amount of additional water conservation is expected throughout SacSewer's service area, and the wastewater treatment provider expects the existing 181 mgd ADWF capacity to be sufficient through 2050. Accordingly, the Targeted Municipal Services Review concludes that the SRWTP would maintain sufficient capacity to treat wastewater flows generated by the proposed project, in addition to the provider's existing commitments.

The proposed project's impacts related to sewer services, as well as other public services and utilities, are discussed in further detail in Chapter 4.11, Public Services, Utilities, and Service Systems, of this Draft EIR. As determined in Chapter 4.11, sewer infrastructure included as part of the proposed project would be sufficient to serve the proposed project without requiring the relocation or construction of new or expanded wastewater treatment facilities, and the proposed sewer infrastructure, including the



off-site force main, would be sized to accommodate only the proposed project. Thus, the proposed project's overall impacts related to public services and utilities would be less than significant.

Based on the above, the proposed project would not directly induce substantial unplanned population growth.

Indirect Population Growth

Because the proposed project would redesignate the industrial park footprint and the nonparticipating parcels (totaling 414.3 acres – not including roadways) of the project site from Agricultural Cropland to Employment Mixed-Use, new jobs related to the industrial park and commercial uses would be created at the project site. Therefore, the proposed project would result in long-term employment growth in the area.

As discussed above, the proposed project could conservatively result in an increase of the permanent population by approximately 4,000 residents who would be employed by the new industrial and/or commercial businesses. The new residential population would likely patronize local businesses and services in the area, fostering economic growth. Furthermore, cumulative development, in conjunction with the proposed project, would result in increased demand for public services and utilities. However, as discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, the project's demand for public services could be accommodated by existing services and would not create a need for new or altered governmental facilities. Furthermore, development of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater, electricity, natural gas, and telecommunications facilities.

The project would also provide short-term employment opportunities, which would likely be filled from the local employee base, with the possible exception of a few landscape maintenance jobs. While construction of the proposed project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the project site, employment patterns of construction workers are such that construction workers would not likely, to any significant degree, relocate their households as a result of the construction-related employment opportunities associated with the proposed project.

In addition, following approval of Annexation into the City, the proposed project would be annexed into the service areas for SacSewer, and service would be made available to the project. Underground infrastructure improvements for the proposed project would include new on-site water lines, as well as new on-site sanitary sewer gravity system, force main, and pump station. Development of the project site would also require installation of off-site sewer infrastructure to accommodate the proposed land uses. The proposed sewer infrastructure, including the off-site force main, would be sized to accommodate only the proposed project.

Based on the above, the proposed project would not indirectly induce substantial unplanned population growth.



Conclusion

Considering the above, development of the proposed project could result in direct on-site population growth; however, population growth resulting from the proposed project would be within the City of Sacramento 2040 General Plan and SACOG growth estimates for the project area. As a result, impacts related to the direct or indirect inducement of substantial population growth would be considered **less than significant**. It should be noted that potential impacts related to growth inducement are discussed further within Chapter 6, Statutorily Required Sections, of this EIR, consistent with Section 15126.2(d) of the CEQA Guidelines.

Mitigation Measure(s)

None required.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

The cumulative setting for impacts related to land use and planning/population and housing encompasses buildout of the City of Sacramento 2040 General Plan policy area, including the Northlake (Greenbriar) subdivision to the north of the project site, as well as the sites of the Metro Air Park, the Upper Westside Specific Plan, the Grandpark Specific Plan (formerly Natomas North Precinct), the Sacramento International Airport Master Plan, and the Elkhorn Boulevard Extension Project. For further details related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections, of this EIR.

4.9-5 Cause a significant cumulative 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. Based on the analysis below, the cumulative impact is less than significant.

Land use plans or policies and zoning generally do not combine to result in cumulative impacts. The determination of significance for impacts related to such issues is whether the project would 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. Such a conflict is site-specific, and, thus, is only addressed on a project-by-project basis. As shown in Table 4.9-7 at the end of this chapter, the proposed project would be generally consistent with relevant policies in the City of Sacramento 2040 General Plan and the SMF ALUCP.

Therefore, the proposed project would not cause a significant cumulative 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, and the cumulative impact would be **less-than-significant**.



Mitigation Measure(s)

None required.

4.9-6 Cause a significant cumulative environmental impact due to cumulative substantial unplanned population growth. Based on the analysis below, the cumulative impact is *less than significant*.

As discussed in Chapter 6 of this EIR, CEQA Guidelines Section 15064(h)(4), states, “[...] the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.” Therefore, even where cumulative impacts are significant, any level of incremental contribution is not necessarily deemed cumulatively considerable.

While the developed areas in the City limits are comprised of single-family residential, multi-family residential, commercial, industrial, and public uses, other areas in the cumulative setting within and adjacent to the City limits are planned for development through buildout of the following projects: the Northlake (Greenbriar) subdivision to the north of the project site, as well as the sites of the Metro Air Park, the Upper Westside Specific Plan, the Grandpark Specific Plan (formerly Natomas North Precinct), the Sacramento International Airport Master Plan, and the Elkhorn Boulevard Extension Project. As shown in Table 4.9-4, the City of Sacramento, is projected to have a 27 percent increase in population from 466,488 residents in 2010 to 640,381 residents in 2035. However, such estimates do not account for the future expansion of the City through buildout of the aforementioned projects.

The City of Sacramento 2040 General Plan enables residential growth and identifies the necessary infrastructure improvements needed to keep pace with that growth by providing a plan for future roads, utilities, and government services to support future growth. The new industrial uses provided by the proposed project would fall within the City of Sacramento 2040 General Plan and SACOG’s growth estimates for the City of Sacramento and for the region. As discussed in Impact 4.9-4, the proposed project would not induce unplanned population growth, either directly or indirectly. Given that the proposed project would not create housing, the nature of the project would not directly induce population growth. While the project would provide space for new business and is anticipated to generate a total of approximately 4,000 new employees, development would not necessarily induce unplanned population growth.

It should be noted that population growth itself does not constitute a significant physical environmental effect. Rather, the determination of significance is based on whether population growth associated with a project has been previously planned for, and whether such growth could result in indirect impacts from associated development. As such, the cumulative analysis within each technical chapter of this EIR evaluates the physical environmental impacts of cumulative development.

Considering the above, implementation of the proposed project, in combination with future development occurring under buildout of the City of Sacramento 2040 General



Plan, would result in a ***less-than-significant*** cumulative impact related to substantial unplanned population growth.

Mitigation Measure(s)

None required



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|---|--|
| <i>City of Sacramento 2040 General Plan</i> | |
| <i>Land Use and Placemaking</i> | |
| LUP-1.4 | <p>City Services Prior to Annexation. Prior to the provisions of City services to new development in unincorporated areas, the City shall require that the unincorporated properties be annexed into the City. Alternatively, the City may provide utility service to properties in advance of annexation only if the annexation process has been initiated and the landowner and City have executed a conditional agreement for services that stipulates minimum standards for the development of roads and urban infrastructure and criteria and conditions for annexation into the City.</p> |
| LUP-1.12 | <p>Development Adjacent to Agriculture. The City shall require open space or other appropriate buffers for new development abutting productive agricultural areas to protect the viability of active agricultural operations outside of the city and ensure compatibility of uses with residents in adjacent areas.</p> |
| LUP-1.13 | <p>Airport Land Use Compatibility. The City shall work with the Sacramento County Airport System (SCAS) and the Airport Land Use Commission (ALUC) to ensure that new development near the area's airports is compatible with airport operations, adopted ALUC policies, and applicable Airport Land Use Compatibility Plans.</p> |
| LUP-2.5 | <p>Design for Connectivity. The City shall require that all new development maximizes existing and new connections with surroundings and with centers, corridors, parks, and neighborhoods to enhance efficient and direct pedestrian, bicycle, and vehicle movement. When feasible, grid patterns should be utilized to facilitate multiple routes.</p> |
| LUP-4.7 | <p>Visual and Physical Character. Using development standards and design standards/guidelines, the City shall promote</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|--|
| <p>development patterns and streetscape improvements that transform the visual and physical character of automobile-oriented corridors to create a positive impact on the human and natural systems that interact with them.</p> | <p>to provide greater flexibility in the design of integrated developments than otherwise possible through strict application of zoning regulations. With respect to industrial development, a PUD allows for well-designed and controlled groupings of research, service, or light industrial uses within an area containing visual and operational amenities and features, such as selective occupancies, setbacks, landscaping, and bulk and building material controls. As such, all landscaping requirements would be subject to review and approval by the City to ensure compliance with all City landscaping requirements. Therefore, the proposed project would generally comply with Policy LUP-4.7.</p> |
| <p>LUP-4.10 Multi-Modal Access. The City shall require that new development provide bicycle, pedestrian, and transit access where appropriate to reduce the need for onsite parking and to improve the pedestrian experience within corridors and centers with street trees and landscaping.</p> | <p>Please see response to Policy LUP-2.5, above.</p> |
| <p>LUP-7.5 Industrial Aesthetics. The City shall encourage the development and maintenance of well-designed industrial and light industrial properties and structures that meet adopted standards for visual quality and design, especially where interfacing with other uses.</p> | <p>Please see response to Policy LUP-4.7, above.</p> |
| <p><i>Historic and Cultural Resources</i></p> | |
| <p>HCR-1.1 Archaeological, Tribal, and Cultural Resources. The City shall continue to comply with federal and State regulations and best practices aimed at protecting and mitigating impacts to archaeological resources and the broader range of cultural resources as well as tribal cultural resources.</p> | <p>The proposed project would be required to comply with Mitigation Measure 4.5-2, which ensures that any previously unknown archeological or cultural resources encountered on-site would not be disturbed. The proposed project would also be required to comply with Mitigation Measures 4.13-1(a) through 4.13-1(c), which impose procedures to halt construction activities if previously unknown tribal cultural resources are encountered on-site. With implementation of the above Mitigation Measures, the proposed project would not conflict with Policy HCR-1.1.</p> |
| <p>HCR-1.3 Compatibility with Historic Context. The City will continue to review new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context and consistency with design guidelines/standards, including the Historic District Plans. The City shall pay special attention to the scale, massing, and relationship of</p> | <p>As discussed in Chapter 4.5, Cultural Resources, of this EIR, the project site lies within two districts documented as P-34-005251 and P-34-005225. However, as discussed therein, the proposed project would not result in a significant impact to cultural resources. As such, the project would not conflict with Policy HCR-1.3.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|---|---|
| <p>proposed new development to complement surrounding historic environments.</p> | |
| <p>HCR-1.6 Early Project Consultation. The City will continue to strive to minimize impacts to historic and cultural resources by consulting with property owners, land developers, tribal representatives, and the building industry early in the development review process as needed.</p> | <p>As part of the Cultural Resources Study prepared for the proposed project by Tom Origer & Associates, a records search of the North Central Information Center (NCIC) of the CHRIS was conducted for the project site. In addition, Tom Origer & Associates contacted the NAHC requesting a search of the Sacred Lands File (SLF) for traditional cultural resources within or near the project site on January 21, 2022. Furthermore, as discussed in Chapter 4.13, Tribal Cultural Resources, of this EIR, pursuant to AB 52, project notification letters were sent by the City to tribes who requested notification of proposed projects within this geographic area on January 27, 2022. Similarly, SB 18 notification letters were sent by the City on January 27, 2022, to a list of tribes that were identified by the NAHC as being culturally or traditionally affiliated with the project area. As such, the proposed project has satisfied the requirements of Policy HCR-1.6.</p> |
| <p>HCR-1.7 Contextual Features. The City shall promote the preservation, rehabilitation, restoration, and/or reconstruction, as appropriate, of contextual features related to historic resources, including maintenance and reconversion of parkway strips to landscaping; maintenance and replication of historic sidewalk patterns; use of historic streetlamps and street signs; and maintenance or restoration of historic park features.</p> | <p>As discussed in Chapter 4.5, Cultural Resources, of this EIR, although known historical resource sites have been recorded on-site, all such resource sites were evaluated and considered ineligible for the California Register of Historic Resources (CRHR) or the National Register of Historic Places (NRHP). As such, the proposed project would not adversely impact any historic resources, and the project would not conflict with Policy HCR-1.7.</p> |
| <p>HCR-1.15 Treatment of Native American Human Remains. The City shall treat Native American human remains with sensitivity and dignity and ensure compliance with the associated provisions of California Health and Safety Code and the California Public Resources Code. The City shall collaborate with the most likely descendants identified by the Native American Heritage Commission.</p> | <p>As discussed in Chapter 4.13, Tribal Cultural Resources, of this EIR, Mitigation Measures 4.13-1(a) through 4.13-1(c) would reduce impacts related to tribal cultural resources to a less-than-significant level. For example, Mitigation Measure 4.13-1(a) requires the applicant/contractor to provide a tribal cultural resources sensitivity and awareness training program for all personnel involved in project construction. In addition, if tribal cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, Mitigation Measure 4.13-1(b) requires construction activities to be suspended within 100 feet of the find (based on the apparent distribution of cultural materials) and the construction</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|--|
| | <p>contractor would be required to immediately notify the project's City representative. Furthermore, if an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, Mitigation Measure 4.13-1(c) requires the City to immediately halt potentially damaging excavation in the area of the remains and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (HSC Section 7050.5[b]).</p> <p>Based on the above, the proposed project would comply with Policy HCR-1.15.</p> |
| <p>HCR-1.17 Evaluation of Archeological Resources. The City shall work in good faith with interested communities to evaluate proposed development sites for the presence of sub-surface historic, archaeological, and tribal cultural resources that may be present at the site. These efforts may include the following:</p> <ul style="list-style-type: none"> • Consideration of existing reports and studies, • Consultation with Native American tribes as required by State law, • Appropriate site-specific investigative actions, and • Onsite monitoring during excavation if appropriate. | <p>Please see response to Policy HCR-1.15, above.</p> <p>The Cultural Resources Study prepared by Tom Origer & Associates for the proposed project included a cultural resources literature search, archival research, consultation with the NAHC, and field surveys. Tom Origer & Associates also contacted the tribes identified by the NAHC.</p> <p>In compliance with AB 52 and SB 18, project notification letters were sent by the City of Sacramento on January 27, 2022 to tribes who requested notification of proposed projects within this geographic area. The City received one response to both the AB 52 and SB 18 notification letters from the UAIC, with a request to consult on the proposed project due to the cultural sensitivity of the area. The City subsequently initiated consultation with the UAIC. Consultation included the provision of the Cultural Resources Study to the UAIC for review. The UAIC provided tribe-specific mitigation to be implemented as part of the proposed project, which is included in Chapter 4.13 Tribal Cultural Resources, of this EIR.</p> <p>Furthermore, in the event subsurface deposits believed to be cultural or human in origin are discovered during construction, implementation of Mitigation Measure 4.5-2 requires all work to halt within a 50-foot radius of the discovery. A qualified professional archaeologist, meeting the</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
|-----------------|--|---|
| | | Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, will then be retained to evaluate the significance of the find, and will have the authority to modify the no-work radius as appropriate, using professional judgment. Based on the above, the proposed project would comply with HCR-1.17. |
| <i>Mobility</i> | | |
| M-1.5 | Street Design Standards. The City shall maintain street design and operations standards that prioritize comfort and travel time for walking, bicycling, and transit, while managing vehicle speeds and traffic volumes, updating them as best practices evolve. | See response to Policy LUP-4.10, above. In addition, as further discussed in Chapter 4.12, Transportation, the proposed project would be required to comply with all building, fire, and safety codes and specific development plans would be subject to review and approval by the City's Public Works Department and the City's Fire Department, which would ensure that the proposed project's internal roadway network is in compliance with all City design and operations standards. Therefore, the proposed project would comply with Policy M-1.5 |
| M-1.11 | Increase Bicycling and Walking. The City shall strive to increase bicycling and walking citywide so that it can meet its equity, reduced vehicle miles traveled, and sustainability goals. | See response to Policy LUP-4.10, above. |
| M-1.13 | Walkability. The City shall design streets to prioritize walking by including design elements such as the following: <ul style="list-style-type: none"> • Grid networks that provide high levels of connectivity; • Closely spaced intersections; • Frequent and low-stress crossings; • Wide, unobstructed walkable sidewalks; • Separation from vehicle traffic; • Street trees that provide shading; and • Minimal curb cuts. | Please see response to Policy M-1.5. As discussed above, the project would be served by a new internal roadway system including Airport South Industrial Drive, a modified two-lane Local Industrial roadway with a 75-foot right-of-way, that would bisect the property west to east by connecting Power Line Road to a future street (labeled "A" Drive in Figure 3-3) that would run north along the site's eastern border and connect to a proposed round-a-bout where Bayou Way meets the project site. In addition, Mitigation Measure 4.12-2 of this EIR would require that the proposed project implement new bicycle and pedestrian improvements along the project frontage, in compliance with City standards. In addition, all internal roadways and associated bicycle and pedestrian improvements would be constructed in conformance with City standards. |
| M-1.18 | Bicycling Safety. When designing projects, the City shall prioritize designs that strengthen the protection of people bicycling such as improvements that increase visibility of bicyclists, increase bikeway widths, raise bikeways, design safer intersection crossings and turns, and separate bikeways from traffic wherever feasible. | See response to Policy LUP-4.10, above. |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
|--------|---|---|
| M-1.19 | Walking Safety. When designing projects, the City shall prioritize designs that encourage walking and improve walking safety best practice designs and considerations for efficiencies in walking. | Mitigation Measure 4.12-2 of this EIR would require that the proposed project implement new bicycle and pedestrian improvements along the project frontage, in compliance with City standards. In addition, all internal roadways and associated bicycle and pedestrian improvements would be constructed in conformance with City standards. Therefore, the proposed project would comply with Policy M 2.1.2. |
| M-1.36 | Electric Vehicles (EVs) in New Development. The City shall support minimum levels of EV infrastructure readiness and installation in new development and incentivize additional levels of EV charging, and EV car share, beyond City Code minimums. | As discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of this EIR, consistent with SMAQMD BMP-2, the proposed project would provide EV Ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces (see Table 4.3-16 of this EIR). Given that the proposed project is anticipated to include a total of approximately 3,670 parking stalls, the project would be required to provide 1,652 EV Ready spaces, and 545 of the EV Ready spaces would be required to have EVSE. Compliance with BMP-2 would be ensured by Mitigation Measure 4.3-2(c). Therefore, the proposed project would comply with Policy M-1.36. |
| M-1.40 | Contributions from New Development. The City shall require new development to construct or pay a proportionate share of the cost of improvements based on mobility-related impacts of the new development. | As discussed in the local transportation analysis (LTA) prepared for the proposed project by DKS Associates, the proposed project would be required to pay their fair share contribution towards intersection improvements within the project area. In addition, The proposed project would be required to pay their fair share contribution towards City-funded transit related improvements within the project area. Therefore, the proposed project would comply with Policy M-1.40. |
| M-2.3 | Vehicle Miles Traveled (VMT) as Metric. Consistent with state law, the City shall evaluate transportation California Environmental Quality Act (CEQA) impacts using vehicle miles traveled or other metrics as determined by the City, and shall not rely on automobile delay, as described by level of service or similar measures of vehicular delay as a measure of environmental significance. Local Transportation Analyses (LTA) shall continue to be required when necessary to aid in conditioning project entitlements for needed operational improvements. | Transportation impacts related to VMT are analyzed in Chapter 4.12, Transportation, of this EIR. As discussed therein, the proposed project does not include any retail uses in excess of 50,000 sf. Therefore, the highway commercial uses are considered to be local-serving retail, and consistent with OPR guidance, would result in a less-than-significant impact related to VMT. However, based on the SACOG SACSIM 19 travel demand model, the on-site industrial uses are anticipated to generate VMT at 128 percent of the regional average, which is above the significance threshold established for the proposed project. Therefore, the proposed project would be required to comply with Mitigation Measure 4.12-3, which requires that the owner/operator of on-site industrial building prepare and implement a VMT Reduction Plan to reduce VMT by at least |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | <p>22 percent prior to the certificate of occupancy, consistent with the VMT Mitigation Memorandum prepared by the City’s Public Works Department for the proposed project. As noted in Chapter 4.12, with implementation Mitigation Measure 4.12-3, the proposed project would achieve a 22 percent reduction in VMT, and a less-than-significant impact related to VMT would occur.</p> <p>Based on the above, the proposed project would comply with Policy M-2.3.</p> |
| <i>Public Facility and Safety</i> | |
| <p>PFS-1.15 Development Fees for Facilities and Services. The City shall require development projects to contribute fees to ensure the provision of adequate police and fire services.</p> | <p>City of Sacramento 2040 General Plan Policy PFS-1.9 establishes the City’s commitment to ensuring the SPD and SFD have the necessary levels of facilities, equipment, and staffing. Accordingly, revenues generated through payment of applicable permit application fees, as well as development impact fees established pursuant to Sacramento City Code Section 18.24.050, ensure new development pays a fair share for police protection services provided by the SPD. The City funds the SFD budget, in part, through revenues generated from payment of application fees for applicable permits and clearances by new development. In addition, new development within the City is subject to applicable development impact fees to ensure a fair-share contribution is made to finance the purchase of new or expansion of existing SFD facilities, apparatus, and equipment necessary for the purposes of maintaining adequate service levels.</p> <p>Similar to the proposed project, cumulative development within the City’s General Plan policy area would be subject to applicable taxes and fees, including, but not limited to, property taxes, franchise taxes, business license taxes, and license and permit fees. Additionally, new residents generated by cumulative development would be subject to local sales taxes. Thus, revenues generated through fee payments associated with cumulative development would pay fair shares toward any new SPD and/or SFD facilities deemed necessary by the City, all of which would be required to be designed and constructed in accordance with applicable regulations and standards, and if necessary, undergo CEQA review.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
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| | | Based on the above, the proposed project would not conflict with Policy PFS-1.15. |
| PFS-1.16 | Development Review. The City shall continue to require new development projects to incorporate safety features and include the Sacramento Police Department (SPD) and the Sacramento Fire Department (SFD) in the development review process to ensure that projects are designed and operated in a manner that minimizes the potential for criminal activity and fire hazards and maximizes the potential for responsive police and fire services. | <p>The development standards established by Sacramento City Code Section 17.220.250 for the M-1-PUD zoning district require compliance with the City’s wall, fence, and gate regulations, which are set forth in Sacramento City Code Chapter 17.620. The aforementioned regulations allow for enhanced fencing materials capable of providing additional security for nonresidential structures and requirements for gated entrances. Such features would reduce the demand for police protection services associated with the proposed project.</p> <p>In addition, all structures included as part of the proposed project would be constructed in accordance with the applicable standards set forth by the CBC and CFC. Consistent with the CBC, the design of the proposed buildings would include the installation and use of automatic fire sprinklers. Fire alarm systems would be incorporated pursuant to CFC requirements. Such features would reduce the potential for fires to occur and spread within the proposed structures, thereby reducing the demand for fire protection services associated with the proposed project.</p> <p>Based on the above, the proposed project would incorporate safety features and include the SPD and the SFD in the development review process to ensure that projects are designed and operated in a manner that minimizes the potential for criminal activity and fire hazards and maximizes the potential for responsive police and fire services. Therefore, the proposed project would not conflict with Policy PFS-1.16.</p> |
| PFS-3.1 | Provision of Adequate Utilities. The City shall continue to provide reliable water, wastewater, and stormwater drainage utility services. | As discussed under Impact 4.11-6 in the Public Services, Utilities, and Service Systems chapter of this EIR, the total average daily water demand for the proposed project would be 313.54 acre-feet per year (AFY). The City is anticipated to have a surplus of water supplies in all hydrologic conditions through 2045, and the lowest projected surplus is expected to be 198,436 AFY in 2045 during the fifth consecutive year of drought. Therefore, given the substantial amount of surplus projected for the City’s water supplies in all hydrologic conditions, the City’s existing water supplies would be able to accommodate the demand anticipated to be |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | <p>generated by the City’s existing commitments, as well as the water demand projected for the proposed project.</p> <p>With respect to wastewater service, as discussed under Impact 4.11-7 in the Public Services, Utilities, and Service Systems chapter of this EIR, the project’s cumulative average dry weather flow (ADWF) and peak wet weather flow (PWWF) demand is estimated to be 0.81 mgd and 2.09 mgd, respectively. The Sacramento Regional Wastewater Treatment Plant (SRWTP) is permitted to treat ADWF of 181 mgd. Since the opening of the SRWTP, system improvements have been made to accommodate regional growth and to add capacity to SacSewer’s interceptor system. Accordingly, the SRWTP would maintain sufficient capacity to treat wastewater flows generated by the proposed project, in addition to the provider’s existing commitments.</p> <p>With respect to storm drainage service, as discussed under Impact 4.8-4 in the Hydrology and Water Quality chapter of this EIR, the runoff from impervious surfaces created as part of the proposed project would be routed to six new detention basins located adjacent to the RD 1000 ditches and canals that border the western and southern boundaries of the project site, and areas adjacent to the RD 1000 L Drain (which bisects the eastern portion of the project site). The basins would be connected to the RD 1000 system through weirs to meet the pre-project spill conditions and to provide on-site floodplain storage. The proposed on-site stormwater drainage system is a closed system that would only experience external influences during larger events like the 100-year event. As summarized in Table 4.8-1 of this EIR, the proposed detention basins would be sufficiently sized to meet the required storage volumes. Thus, project runoff would be properly treated, and would not pollute downstream waterways. In addition, as summarized in Table 4.8-2 of this EIR, the outflow that would occur during post-project conditions closely mirrors the existing conditions of the project site. Thus, the proposed drainage system would not result in extensive period of standing water in the basins.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
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| | | Based on the above, the proposed project would not conflict with Policy PFS-3.1. |
| PFS-3.3 | Development Impacts. Through the development review process, including through development impact fees and offsite improvements constructed by new development, the City shall ensure that adequate public utilities and services are available to serve new development. | See responses to Policies PFS-1.15, PFS-3.1 and PFS-3.13 above. |
| PFS-3.10 | Meet Projected Needs. The City shall foster the orderly and efficient expansion of facilities and infrastructure to adequately meet projected needs, comply with current and future regulations, and maintain public health, safety, and welfare. Infrastructure and facility planning should discourage over-sizing of infrastructure that could induce growth at the edges of the city beyond what is anticipated in the General Plan. | As discussed under Impact 4.11-6 in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, the Targeted Municipal Services Review prepared for the proposed project evaluated total buildout of the project site in accordance with the proposed land uses and the proposed utility improvements have been sized to accommodate full buildout of the project site, including the industrial park footprint and the nonparticipating parcels. Thus, the proposed project would be consistent with Policy PFS-3.10. |
| PFS-3.12 | Safe and Compatible Utility Design. The City shall ensure that public utility facilities are designed to be safe and compatible with adjacent uses. | As discussed under Impact 4.11-5 in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, the proposed project would include a new pump station, which would be sited in Lot F. The new pump station would be designed and constructed in accordance with SacSewer Standards and Specifications, which provides that new pump stations must include natural screening to allow the facility's architecture to blend into the local surroundings. All other utility improvements constructed as part of the proposed project would be installed underground and designed in compliance with applicable standards set forth by the City of Sacramento Standard Specifications and the SacSewer Standards and Specifications. In addition, in accordance with Sacramento City Code Section 12.12.260, new electrical infrastructure extended to the project site to serve the proposed project would be installed underground. As such, all new underground infrastructure constructed as part of the proposed project would be safe and compatible with adjacent uses. Based on the above, the proposed project would be consistent with Policy PFS-3.12. |
| PFS-3.13 | Impacts to Environmentally Sensitive Lands. The City shall consider the impacts on environmentally sensitive areas and habitats when locating and designing municipal utilities. | The proposed project would include new connections to existing water and storm drainage infrastructure in the immediate project vicinity, as well as connection to the North Natomas interceptor line within East Commerce |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | <p>Way through one of three optional off-site sewer alignments. To ensure that potential impact do not occur to environmentally sensitive areas as a result of the proposed project, the project would be subject to a wide range of mitigation to minimize all potential adverse effects to habitat for special-status species and other protected biological resources. With respect to potential impacts that could occur to special-status plant and wildlife species, mitigation measures would require implementation of applicable Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures for Covered Species to address potential impacts that could occur as a result of all project-associated construction activities, regardless of whether they occur within or outside of the Natomas Basin HCP permit area. For species not covered under the Natomas Basin HCP, such as northern harrier, white-tailed kite, song sparrow, and other nesting birds and raptors protected under the MBTA and CFGC, mitigation measures are also included to address potential impacts. As detailed in the Biological Resources chapter of this EIR, with implementation of the mitigation measures established therein, potential impacts to protected biological resources would not occur.</p> <p>In addition, new utility infrastructure would be designed and constructed in accordance with the applicable standards set forth by the City of Sacramento Standard Specifications or the Sacramento Area Sewer District (SacSewer) Standards and Specifications, ensuring the utility improvements are constructed in conformance with proper materials and sizing.</p> <p>Compliance with the applicable standards established by the City of Sacramento and SacSewer, as well as the mitigation measures set forth in this EIR would reduce potential impact to environmentally sensitive areas to a less-than-significant level. Thus, the proposed project would not conflict with Policy PFS-3.13.</p> |
| <p>PFS-3.14 Underground Utilities. The City shall require new development to underground utility lines wherever feasible and coordinate with electricity and telecommunications providers to underground existing overhead lines where feasible.</p> | <p>Please see response to Policy PFS-3.12, above.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
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| PFS-3.15 | Adequate Drainage Facilities. The City shall ensure that all new municipal drainage facilities are adequately sized and constructed to accommodate stormwater runoff, including incorporating “green infrastructure” design and Low Impact Development (LID) techniques, where appropriate, stormwater treatment features, and, if applicable, trash capture devices for its stormwater facilities. | As discussed in Chapter 4.8, Hydrology and Water Quality, of this EIR, according to the Preliminary Drainage Study prepared for the proposed project, the proposed project would include an on-site storm drain system composed of post construction stormwater quality measures such as Low Impact Development (LID) components, dedication of landscaping areas, and six on-site detention basins, consistent with the Sacramento region Stormwater Quality Design Manual. The proposed LID features would be sufficiently sized to meet the required storage volumes. Furthermore, compliance with the Sacramento region Stormwater Quality Design Manual, and, by extension, the City’s NPDES permit, would be further enforced through the implementation of Mitigation Measure 4.8-2. Based on the above discussion, the proposed project would comply with Policy PFS-3.15. |
| PFS-3.16 | Stormwater Design in Private Development. The City shall require proponents of new development and redevelopment projects to submit drainage studies that adhere to City stormwater design requirements and incorporate measures, including “green infrastructure”, Low Impact Development (LID) techniques, stormwater treatment, and, if applicable, trash capture devices, to prevent on- or off-site flooding and improve runoff water quality. | Please see response to Policy PFS-3.15, above. |
| PFS-4.8 | New Development. The City shall ensure that water supply capacity is in place prior to granting building permits for new development. | As discussed under Impact 4.11-6 in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, based on the data presented in Table 4.11-5, the proposed project’s associated water demand would be 314.35 acre-feet per year (AFY). As shown in Table 4.11-1 of this EIR, based on estimations from the City of Sacramento 2020 Urban Water Management Plan (UWMP), the City is anticipated to have a water supply surplus from 2025 to 2045 during normal, single dry, and multiple dry years, with the minimum surplus in all years expected to be 198,436 AFY in 2045 during the fifth consecutive year of a five-year drought. Thus, the City of Sacramento would have sufficient water supplies to serve existing demand, as well as the demand generated by the proposed project, in normal, single dry, and multiple dry years. Thus, the proposed project would be consistent with Policy PFS-4.8. |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
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| <i>Environmental Justice</i> | | |
| EJ-1.4 | Impact Assessment. The City shall continue to use the Sacramento Metropolitan Air Quality Management District (SMAQMD) modeling tools and guidance documents, as appropriate, to identify and mitigate air quality impacts from proposed development projects. | As discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, the analysis protocol and guidance provided by the SMAQMD's <i>CEQA Guide</i> , including screening criteria and pollutant thresholds of significance, was used to analyze the proposed project's air quality impacts. Additionally, implementation of Mitigation Measure 4.3-1(a) would ensure the proposed project's compliance with SMAQMD's Basic Construction Emissions Control Practices (BMPs). Furthermore, an operational Health Risk Assessment (HRA) was prepared for the proposed project in order to assess the health risk impacts of DPM emissions from heavy-duty trucks travelling to and from the project site on nearby sensitive receptors, such as the single-family residences located east of the project site and the Paso Verde K-8 School located south of the project site. Based on the results of the HRA, operation of the proposed project would not expose sensitive receptors to excess concentrations of pollutants, and the proposed project would result in a less-than-significant impact related to DPM. |
| EJ-1.8 | Site Contamination. The City shall ensure buildings and sites are or have been investigated for the presence of hazardous materials and/or waste contamination before development, where applicable. The City shall continue to require remediation and construction techniques for adequate protection of construction workers, future occupants, adjacent residents, and the environment, and ensure they are adequately protected from hazards associated with contamination. | Potential impacts related to hazards and hazardous materials are addressed throughout Chapter 4.7 of this EIR. The analysis therein is based primarily on the Phase I Environmental Site Assessment (ESA) prepared for the project site by Environmental Investigation Services, Inc. Based on the Phase I ESA, the EIR concludes that implementation of Mitigation Measures 4.7-2(a) and 4.7-2(b), which require testing of on-site soils for hazardous materials and appropriate actions if such materials are discovered, would be sufficient to ensure that a significant impact would not occur. Therefore, the proposed project would comply with Policy EJ-1.8. |
| <i>Environmental Resources and Constraints</i> | | |
| ERC-1.4 | Construction Site Impacts. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, stormwater treatment, runoff reduction measures, best management practices (BMPs), Low Impact Development (LID), and hydromodification strategies to | As discussed in Chapter 4.8, Hydrology and Water Quality, of this EIR, according to the Preliminary Drainage Study prepared for the proposed project, the proposed project would include an on-site storm drain system composed of post construction stormwater quality measures such as LID components, dedication of landscaping areas, and six on-site detention basins, consistent with the Sacramento region Stormwater Quality Design |



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| Policy | Project Consistency |
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| <p>avoid or minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City’s erosion and sediment control ordinance and stormwater management and discharge control ordinance.</p> | <p>Manual. The proposed LID features would be sufficiently sized to meet the required storage volumes. Furthermore, compliance with the Sacramento region Stormwater Quality Design Manual, and, by extension, the City’s NPDES permit, would be further enforced through the implementation of Mitigation Measure 4.8-2, which would require the applicant to submit a detailed BMP and water quality maintenance plan to the City for review and approval prior to approval of final project improvement plans for any on-site development.</p> <p>As discussed under Impact 4.6-2 in Chapter 4.6, Geology and Soils, of this EIR, in accordance with the NPDES General Construction Permit, the project would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and submit a Notice of Intent (NOI) to the Regional Water Quality Control Board (RWQCB). The SWPPP would include details of the sediment and erosion control practices. Furthermore, in compliance with Chapter 15.88 of the City Code, the project applicant would be required to prepare a grading plan and a sediment and erosion plan. The grading plan and a sediment and erosion plan would include erosion control measures and sediment control measures to ensure the stability of the ground surface and soil within the project site during construction activities.</p> |
| <p>ERC-2.2 Biological Resources. The City shall ensure that adverse impacts on sensitive biological resources, including special-status species, sensitive natural communities, sensitive habitat, and wetlands are avoided, minimized, or mitigated to the greatest extent feasible as development takes place.</p> | <p>See response to Policy PFS-3.13 above.</p> |
| <p>ERC-2.3 Onsite Preservation. The City shall encourage new development to preserve and restore on-site natural elements that contribute to the community’s native plant and wildlife species value. For sites that lack existing natural elements, encourage planting of native species in preserved areas to establish or re-establish these values and aesthetic character.</p> | <p>The proposed project would result in the loss of existing on-site habitat that has varying levels of potential to support various special-status plant and wildlife species. However, as discussed in Chapter 4.4, Biological Resources, of this EIR, all potential impacts to protected plant and wildlife species would either be less than significant, or would be reduced to a less-than-significant level with implementation of the mitigation measures established by this EIR. Where a potential impact could result to a Covered Species protected by the Natomas Basin HCP, this EIR requires the proposed project to comply with the applicable Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures to address the</p> |



**Table 4.9-7
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| Policy | Project Consistency |
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| | <p>impact. For example, because special-status plant species could become established within the on-site grasses and canals of the industrial park footprint and nonparticipating parcels prior to commencement of construction activities, Mitigation Measure 4.4-1(a) requires compliance with Natomas Basin HCP Section V.A.1, which necessitates preconstruction surveys and, if necessary, implementation of other measures. Additionally, for potential impacts that could occur to protected species and other biological resources that are not covered under the Natomas Basin HCP, this EIR includes mitigation measures that establish various requirements, including, but not limited to, preconstruction surveys; additional measures to prevent impacts for species that are identified to be on-site; and/or compliance with applicable provisions of the California Fish and Game Code (CFGF) and Clean Water Act (CWA), including obtaining applicable permits and complying the provisions established therein. Thus, with implementation of the mitigation measures set forth within this EIR, the proposed project would be consistent with Policy ERC-2.3.</p> |
| <p>ERC-2.6 Wetland Protection. The City shall preserve and protect wetland resources including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetlands, to the extent feasible. If not feasible, the mitigation of all adverse impacts on wetland resources shall be required in compliance with State and Federal regulations protecting wetland resources, and if applicable, threatened or endangered species. Additionally, the City shall require either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no-net-loss of value and/or function.</p> | <p>As discussed under Impact 4.4-11 in Chapter 4.4, Biological Resources, of this EIR, a total of 1.501 acres of tributary waters and 0.58-acre of other waters potentially subject to U.S. Army Corps of Engineers (USACE) jurisdiction occur within the grading limits of the proposed industrial park. The features are potential tributary waters and other waters of the State, subject to Central Valley RWQCB jurisdiction, as well as aquatic/riparian habitat, subject to requirements set forth by CWA Section 401 and CFGF Section 1600, respectively. In addition, the nonparticipating parcels feature similar land cover and aquatic resources as those that occur in the proposed industrial park footprint. To address the potential impacts, the EIR sets forth Mitigation Measures 4.4-11(a) through 4.4-11(f). Mitigation Measures 4.4-11(a) through 4.4-11(d) require that development of the proposed industrial park obtains authorization for the fill of jurisdictional waters of the U.S. through the CWA Section 404 process, obtains and complies with the provisions of a Section 401 water quality certification, and files a report of waste discharge with the Central Valley RWQCB. In addition, future development of the nonparticipating parcels must complete an Aquatic Resources Delineation (ARD) (conducted by a</p> |



**Table 4.9-7
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| Policy | Project Consistency |
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| | qualified biologist) and obtain Section 404 and 401 permits to address potential impacts, consistent with the provisions of Mitigation Measures 4.4-11(a) through 4.4-11(d). With compliance with Mitigation Measures 4.4-11(a) through 4.4-11(f), the EIR concludes that the potential impact would be reduced to a less-than-significant level. Thus, the proposed project would be consistent with Policy ERC-2.6. |
| <p>ERC-2.7 Annual Grasslands. The City shall preserve and protect native grasslands and vernal pools that provide habitat for rare and endangered species. If not feasible, the mitigation of all adverse impacts on annual grasslands shall comply with State and Federal regulations protecting foraging habitat for those species known to utilize this habitat.</p> | <p>As discussed in Chapter 4.4, Biological Resources, of this EIR, the project site does not include annual grasslands or vernal pools. Thus, the proposed project would be consistent with Policy ERC-2.7.</p> |
| <p>ERC-2.8 Wildlife Corridors. The City shall preserve, protect, and avoid impacts to natural, undisturbed habitats that provides movement corridors for sensitive wildlife species. If corridors are adversely affected, damaged habitat shall be replaced with habitat of equivalent value or enhanced to enable the continued movement of species.</p> | <p>As discussed under Impact 4.4-13 in Chapter 4.4, Biological Resources, of this EIR, the overall project site largely does not function as a wildlife corridor to terrestrial wildlife, as the site is bounded by physical barriers (i.e., roads, urban development, agricultural fields). However, because the canals within project site could support transient giant garter snake on a temporary basis, construction activities associated with the proposed industrial park and future development of the nonparticipating parcels could interfere substantially with the movement of giant garter snake through the site. To address the potential impact, the proposed project would be subject to Mitigation Measure 4.4-12, which requires implementation of applicable Natomas Basin Take Avoidance, Minimization, and Mitigation Measures related to the protection of giant garter snake. With compliance with Mitigation Measure 4.4-12, the EIR concludes that the potential impact would be reduced to a less-than-significant level. Thus, the proposed project would be consistent with Policy ERC-2.8.</p> |
| <p>ERC-2.9 Habitat Assessments. The City shall consider the potential impact on sensitive plants and wildlife for each project requiring discretionary approval. If site conditions are such that potential habitat for sensitive plant and/or wildlife species may be present, the City shall require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the</p> | <p>Please see response to Policy ERC-2.3, above.</p> |



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| Policy | Project Consistency |
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| <p>habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either:</p> <ol style="list-style-type: none"> 1. Protocol-level surveys shall be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey shall be conducted consistent with industry-recognized best practices; or 2. Suitable habitat and presence of the species shall be assumed to occur within all potential habitat locations identified on the project site. Survey Reports shall be prepared and submitted to the City and the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS) (depending on the species) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law. | |
| <p>ERC-2.10 Agency Coordination. The City shall coordinate with State and Federal resource agencies (e.g., California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers, and United States Fish and Wildlife Service (USFWS) to protect areas containing rare or endangered species of plants and animals.</p> | <p>Where a potential impact could result to a Covered Species protected by the Natomas Basin HCP, this EIR requires the proposed project to comply with the applicable Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures to address the impact, which includes coordination with the CDFW and USFWS. Additionally, for potential impacts that could occur to protected species and other biological resources that are not covered under the Natomas Basin HCP, this EIR includes mitigation measures that establish various requirements, including, where applicable, coordination with relevant agencies. Thus, the proposed project would be consistent with Policy ERC-2.10.</p> |
| <p>ERC-2.11 Natomas Basin Habitat Conservation Plan. The City shall continue to participate in and support the policies of the Natomas Basin Habitat Conservation Plan for the protection of biological resources in the Natomas Basin.</p> | <p>Please see response to Policy ERC-2.3.</p> <p>The project site supports suitable habitat for several Natomas Basin HCP Covered Species; however, the project site is adjacent to and largely surrounded by existing urbanized areas including residential neighborhoods, I-5, Metro Air Park, and the Sacramento International Airport master plan area. The goal of the Natomas Basin HCP is the conservation of Covered Species through the acquisition (conservation easement or fee title), protection, and enhancement of existing habitats in</p> |



**Table 4.9-7
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| | <p>the Natomas Basin, minimizing impacts of Covered Activities, including development activities, water facility maintenance, and reserve management activities, and focusing upon the preservation of the overall habitat values in the Natomas Basin. The Natomas Basin HCP was developed to allow some urban development to occur, while ensuring that habitat values are maintained and increased, to the maximum extent practicable, within the Natomas Basin. The Natomas Basin HCP sets forth guidelines and practices including the size and acreage of reserves to be established, acquisition criteria for upland and wetland areas to be acquired and managed by the Natomas Basin Conservancy, and reserve management practices to be employed to ensure successful habitat enhancement to support the Covered Species.</p> <p>As previously discussed above, the proposed project would be subject to the mitigation measures set forth by this EIR, which includes, where applicable, compliance with applicable Natomas Basin HCP Take Avoidance, Minimization, and Mitigation Measures. In addition, as discussed under Impact 4.4-14 in Chapter 4.4, Biological Resources, of this EIR, the proposed project would not affect the effectiveness of the 0.5:1 mitigation ratio for the 17,500 acres of urban development authorized by the Natomas Basin HCP, as the project would not alter the habitat value of land authorized for development under the Natomas Basin HCP, nor adversely affect the habitat value of existing Natomas Basin Conservancy reserves established under the Natomas Basin HCP.</p> <p>Furthermore, the proposed project is not expected to significantly affect the connectivity of reserve habitat, relative to avian species covered under the Natomas Basin HCP, due to the species' highly mobile and migratory nature. Similarly, the proposed project is not expected to significantly affect the connectivity of aquatic habitat in the Natomas Basin, given that the proposed project would be subject to applicable Natomas Basin Take Avoidance, Minimization, and Mitigation Measures related to the protection of giant garter snake.</p> |



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| Policy | Project Consistency |
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| | <p>Finally, the Natomas Basin HCP stipulates that, by the end of its 50-year lifespan, the Natomas Basin Conservancy reserve system will have reached 8,750 acres with one habitat block at least 2,500 acres in size and the balance of reserve lands in habitat blocks of at least 400 acres in size. Development of the proposed project would not prevent the Natomas Basin Conservancy from establishing 8,750 acres of reserves in the Natomas Basin, as identified in the Natomas Basin HCP, as the project site constitutes only 0.89 percent of the acreage in the Natomas Basin and the Natomas Basin Conservancy is well on its way to securing all the reserve lands required to meet its obligations.</p> <p>Based on the above, the proposed project would be consistent with Policy ERC-2.11.</p> |
| <p>ERC-2.13 Climate Change-related Habitat Shifts. The City shall support the efforts of The Natomas Basin Conservancy and other habitat preserve managers to adaptively manage wildlife preserves to ensure adequate connectivity, habitat range, and diversity of topographic and climatic conditions are provided for species to move as climate shifts.</p> | <p>See response to Policy ERC-2.11, above.</p> |
| <p>ERC-3.3 Tree Protection. The City shall encourage public agencies and require private development projects to consider alternatives to removals of healthy trees whenever feasible and to evaluate the longer-term consequences of the inability to meet tree canopy objectives when conducting project analyses and environmental documents. Ensure adequate protections during construction to protect existing tree roots and structure.</p> | <p>As discussed under Impact 4.4-13 in Chapter 4.4, Biological Resources, of this EIR, various trees occur in and along the boundaries of the nonparticipating parcels that could be developed in the future with industrial uses. The EIR requires Mitigation Measures 4.4-13(b) and 4.4-13(c), which require future development of the nonparticipating parcels to identify trees that meet the definition of a Private Protected Tree, as established by Sacramento City Code Section 12.56.020. If protected trees are identified in areas proposed for disturbance of nonparticipating parcels, Mitigation Measure 4.4-13(c) requires the applicant to implement Mitigation Measure 4.4-13(a), which requires obtaining a Tree Permit from the City of Sacramento Community Development Department. Should any on-site tree that would be potentially impacted by the proposed project be found to qualify as a Private Protected Tree, the project applicant shall obtain a Tree Permit from the City of Sacramento Community Development Department. It should be noted that oak woodlands were not identified in the industrial park footprint.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | <p>In addition, the proposed project would be subject to applicable requirements established by the City of Sacramento, including Sacramento City Code Chapter 15.92, which establishes the City’s requirements related to landscape design, installation, maintenance, and management, including those related to newly planted trees. In addition, for new “Street Trees” planted in a City right-of-way, new development must comply with the City’s list of approved shade trees. Thus, the proposed project would be consistent with Policy ERC-3.3.</p> |
| <p>ERC-3.7 Trees of Significance. The City shall promote stewardship of city trees and private protected trees and ensure that the design of development projects provides for the retention of these trees where possible. Where removal cannot be avoided, the City shall require replacement or appropriate remediation.</p> | <p>Please see response to Policy ERC-3.3, above.</p> |
| <p>ERC-4.3 Project Design. The City shall promote the incorporation of new technologies, materials, and design and construction techniques in private development projects that minimize air pollution, noise, excess heat, and other forms of pollution and its impacts.</p> | <p>Implementation of Mitigation Measure 4.3-1(a) would ensure the proposed project’s compliance with SMAQMD’s Basic Construction Emissions Control Practices (BMPs). Additionally, all construction equipment and operation thereof would be regulated per the CARB’s In-Use Off-Road Diesel Vehicle Regulation, which is intended to help reduce emissions associated with off-road diesel vehicles and equipment, including DPM. Project construction would also be required to comply with all applicable SMAQMD rules and regulations, particularly associated with permitting of air pollutant sources. Implementation of Mitigation Measure 4.3-1(b) would require the use of cleaner engine construction equipment, such as Tier 4 final equipment, during project construction, which would further help to reduce DPM emissions during construction. Mitigation Measure 4.3-2 would require design features to be incorporated into the proposed project, such as complete sidewalks, and new technologies, such as all-electric equipment and zero-emission forklifts and heavy-duty vehicles, which would minimize air pollution.</p> <p>With respect to noise, as discussed in Chapter 4.10, Noise, impacts related to construction-related noise would be less than significant. Implementation of Mitigation Measure 4.10-2 would ensure that operational noise is reduced to a less-than-significant-level by incorporating project design features.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | Based on the above, the proposed project would not conflict with Policy ERC-4.3. |
| <p>ERC-4.4 Sensitive Uses. The City shall consult, as appropriate, with the Sacramento Metropolitan Air Quality Management District (SMAQMD) in evaluating exposure of sensitive receptors to toxic air contaminants, and will impose conditions, as appropriate, on projects to protect public health and safety.</p> | <p>An operational HRA was prepared for the proposed project in order to assess the health risk impacts of DPM emissions from heavy-duty trucks travelling to and from the project site on nearby sensitive receptors, such as the single-family residences located east of the project site and the Paso Verde K-8 School located south of the project site. Based on the results of the HRA, operation of the proposed project would not expose sensitive receptors to excess concentrations of pollutants, and the proposed project would result in a less-than-significant impact related to DPM.</p> |
| <p>ERC-4.5 Construction Emissions. The City shall ensure that construction and grading activities minimize short-term impacts to air quality by employing appropriate measures and best practices. Refer to Basic Construction Emissions Control Practices (BMPs) recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD).</p> | <p>Implementation of Mitigation Measure 4.3-1(a) would ensure the proposed project's compliance with SMAQMD's Basic Construction Emissions Control Practices (BMPs). Additionally, all construction equipment and operation thereof would be regulated per the CARB's In-Use Off-Road Diesel Vehicle Regulation, which is intended to help reduce emissions associated with off-road diesel vehicles and equipment, including DPM. Project construction would also be required to comply with all applicable SMAQMD rules and regulations, particularly associated with permitting of air pollutant sources.</p> <p>Given the above, implementation of SMAQMD construction BMPs and Mitigation Measure 4.3-1(a) would ensure the proposed project's consistency with Policy ERC-4.5.</p> |
| <p>ERC-4.6 Gas-Powered Landscaping Equipment. The City shall encourage alternatives to gas- powered landscaping equipment that would reduce exposure to air and sound pollution caused by the use of these machines.</p> | <p>AB 1346 would require that all small off-road engines purchased after January 1, 2024 are all-electric. Thus, future landscaping and maintenance equipment used on-site during operations would include all-electric equipment. As such, the proposed project would be consistent with Policy ERC-4.6.</p> |
| <p>ERC-4.7 Operational Emissions. The City shall require development projects that exceed Sacramento Metropolitan Air Quality Management District (SMAQMD) reactive organic gas (ROG) and nitrogen oxide (NOX) operational thresholds to incorporate design or operational features that reduce emissions equal to 15</p> | <p>An AQMP was prepared, as required by Mitigation Measure 4.3-2, and includes all feasible measures to reduce emissions during project operations, including the prohibition of natural gas, participation in a TMA, use of zero-emission forklifts, use of zero emission vehicles in three percent of the heavy-duty vehicle fleet, and the provision of pedestrian and bicycle infrastructure.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency | |
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| | percent from the level that would be produced by an unmitigated project. | Given the above, implementation of Mitigation Measure 4.3-2 would ensure the proposed project's consistency with Policy ERC-4.7. | |
| ERC-5.2 | Reducing Storm Runoff. The City shall encourage project designs that minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff. | Please see response to Policy PFS-3.15. Additionally, Mitigation Measures 4.8-1 and 4.8-2 would require the implementation of BMPs during construction and operation of the proposed project. | |
| ERC-6.4 | Floodplain Requirements. The City shall regulate development within floodplains in accordance with State and federal requirements and maintain the City's eligibility under the National Flood Insurance Program. | As discussed under Impact 4.8-5, in Chapter 4.8, Hydrology and Water Quality, of this EIR, the entirety of the project site is located within Zone A, which is designated as a Special Flood Hazard Area (SFHA). However, due to levee improvements, portions of the Natomas Basin are now classified as A-99 flood zones, including the eastern portion of the project site. A-99 is an interim designation that allows new development to proceed without elevation verification while the improvements needed to provide 100-year protection are under construction. Nonetheless, the A-99 flood zone is still a SFHA until construction of the levees is complete, and the levees are certified by the Federal Emergency Management Agency (FEMA). In addition, given that the majority of the project site is classified as Zone A, FEMA requires a more detailed local drainage assessment to remove the site from the SFHA, in addition to addressing the levee flooding issues. As such, Mitigation Measure 4.8-5 requires the project applicant to obtain from FEMA a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a SFHA, if required. Compliance with Mitigation Measure 4.8-5 would ensure that the proposed project would be developed in accordance with State and federal requirements. | |
| ERC-6.6 | Flood Regulations. The City shall continue to regulate new development in accordance with State requirements for 200-year level of flood protection and federal requirements for 100-year level of flood protection. | Please see response to Policy ERC-6.4, above. | |
| ERC-6.7 | Flood Hazard Risk Evaluation. The City shall require evaluation of potential flood hazards prior to approval of development projects and shall require new development located within a Special Flood Hazard Area to be designed to | As discussed under Impact 4.8-5, in Chapter 4.8, Hydrology and Water Quality, of this EIR, because the project site is located within a SFHA, the site must be raised above the existing 100-year floodplain. Pursuant to Section 15.104.050 of the City's Municipal Code, new construction is required to place the lowest floor of structures at least one foot above the | |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| <p>meet federal and State regulations and minimize the risk of damage in the event of a flood.</p> | <p>base flood elevation. In addition, Section 11 of the City’s Design and Procedure Manual requires the new construction places the lowest floor of structures at least one foot above the overland release path. Figure 4.8-3, Proposed On-Site Drainage Conditions, provides a grading cross-section that illustrates the relationship between the 100-year water surface elevation (WSE) in the off-site RD 1000 canals, the detention basins, public roadways, parking, and industrial warehouse building elevations. As shown therein, the proposed project would raise the building pads above the 100-year base flood elevation, in compliance with Section 15.104.050.</p> <p>Furthermore, as discussed in Impact 4.8-4, the proposed project would result in reduced WSEs relative to existing conditions for the design storm event. Therefore, the proposed project would be consistent with applicable hydromodification requirements, and would not increase the rate or amount of runoff leaving the project site during the design storm event. Because pre-development and post-development flows associated with the project site would be the same, the proposed project would not have the potential to impede or redirect flood flows.</p> |
| <p>ERC-7.1 Expansive Soils and Liquefaction. In areas of expansive soils and high liquefaction risk, the City shall continue to require that project proponents submit geotechnical investigation reports and demonstrate that the project conforms to all recommended mitigation measures prior to City approval.</p> | <p>As discussed in Impact 4.6, the Preliminary Geotechnical Exploration, performed by ENGE0, determined that while liquefaction of the select subsurface soil layers is possible at the project site, the overall ground surface deformation, as a result of theoretical liquefaction-induced settlement, would not be considered severe. Nonetheless, the Preliminary Geotechnical Exploration concluded that the results of the liquefaction analysis are preliminary, and should be further evaluated with a design-level geotechnical exploration. Without confirmation from such a report, the potential exists for the proposed project to be exposed to substantial risks related to liquefaction.</p> <p>In addition, the Preliminary Geotechnical Exploration determined that the project site contains soils made of clay with high to very high expansion potential. The Preliminary Geotechnical Exploration includes recommendations to reduce potential damage to the proposed project, such as underlying building pads that extend at least ten feet laterally</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | beyond building areas with low-expansive fill or lime treatment, and designing other structural elements, such as pavements and flatwork, for highly expansive soil conditions. The project applicant would select one or more of the measures in consultation with qualified engineers before grading activities begin. However, without implementation of the aforementioned corrective actions, the proposed project would have the potential to be exposed to substantial risks related to expansive soils. Implementation of Mitigation Measure 4.6-3 requires the grading plans to incorporate the geotechnical recommendations specified in the Preliminary Geotechnical Exploration prepared for the proposed project. Based on the above, the proposed project would comply with Policy ERC-7.1. |
| <p>ERC-7.2 Seismic Stability. In accordance with the California Building Code, the City shall regulate structures intended for human occupancy to ensure they are designed and constructed to retain their structural integrity when subjected to seismic activity.</p> | <p>As discussed in Chapter 4.6, Geology and Soils, the project site is not currently within a State of California Seismic Hazard Zone for seismically induced land sliding and the project site does not contain any slopes that could be subject to landslide risks. Furthermore, the proposed project would be required to comply with CBSC requirements related to seismic design. As discussed in Policy ERC-7.1, implementation of Mitigation Measure 4.6-3 would be required. Based on the above, the proposed would comply with Policy ERC-7.2.</p> |
| <p>ERC-10.1 Exterior Noise Standards. The City shall require noise mitigation for all development where the projected exterior noise levels exceed those shown in Table ERC-1 to the extent feasible.</p> | <p>As shown in Table 4.10-9, Project-Related Traffic Noise Level Increases, in Chapter 4.10, Noise, of this EIR, neither the existing nor the existing plus project noise levels would exceed those shown in Table ERC-1. Furthermore, implementation of Mitigation Measure 4.10-2 would ensure that operational noise is reduced to a less-than-significant-level by incorporating project design features, such as an eight-foot-tall sound wall along the eastern project boundary. As such, the proposed project would not conflict with Policy ERC-10.1.</p> |
| <p>ERC-10.2 Noise Source Control. The City should require noise impacts in new developments to be controlled at the noise source where feasible, as opposed to the receptor end, using techniques including but not limited to the following:</p> <ul style="list-style-type: none"> • Site design, • Building orientation, • Building design, and | <p>With respect to noise, as discussed in Chapter 4.10, Noise, impacts related to construction-related noise would be less than significant. Implementation of Mitigation Measure 4.10-2 would ensure that operational noise is reduced to a less-than-significant-level by incorporating project design features, such as an eight-foot-tall sound wall along the eastern project boundary.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
|---------------|---|---|
| | <ul style="list-style-type: none"> Hours of operation. | |
| ERC-10.3 | <p>Interior Noise Standards. The City shall require new development to include noise attenuation to assure acceptable interior noise levels appropriate to the land use, as follows:</p> <ul style="list-style-type: none"> 45 dBA Ldn for residential, transient lodgings, hospitals, nursing homes, and other uses where people normally sleep; and 45 dBA Leq (peak hour with windows closed) for office buildings and similar uses. | Please see response to Policy ERC-10.1, above. |
| ERC-10.4 | <p>Interior Noise Review for Multiple, Loud Short-Term Events. In cases where new development is proposed in areas subject to frequent, high-noise events (such as aircraft over-flights, or train and truck pass-bys), the City shall evaluate interior noise impacts at proposed sensitive receptors. The evaluation shall incorporate measures necessary to meet the 45 dBA Ldn standard.</p> | As discussed under Impact 4.10-4 in Chapter 4.10, Noise, of this EIR, the project site is included within the SMF ALUCP. The site is generally located within the 60 to 65 dBA CNEL airport noise contours. More specifically, the project site is located approximately 0.43-mile outside of the 75 dBA CNEL noise contour. The normally acceptable noise environment for industrial uses is defined as a noise exposure level of less than 75 dBA CNEL. As such, the effects of frequent, high-noise events have been evaluated in this EIR, and impacts related to such have been concluded to be less-than-significant. |
| ERC-10.5 | <p>Interior Vibration Standards. The City shall require construction projects that are anticipated to generate significant vibration levels to use appropriate methods (i.e., type of equipment, low-impact tools, modifying operations, increasing setback distance, vibration monitoring) to ensure acceptable interior vibration levels at nearby residential and commercial uses based on the current City or Federal Transit Administration (FTA) criteria.</p> | As discussed under Impact 4.10-3 in Chapter 4.10, Noise, of this EIR, sensitive receptors would be located at a sufficient distance from the project site such that they would not be significantly impacted by vibration generated by project construction. As such, the proposed project would not conflict with Policy EC 3.1.5. |
| ERC-10.9 | <p>Construction Noise Controls. The City shall limit the potential noise impacts of construction activities on surrounding land uses through noise regulations in the City Code that address permitted days and hours of construction, types of work, construction equipment, and sound attenuation devices.</p> | Impacts related to construction noise associated with project buildout are addressed under Impact 4.10-1 in Chapter 4.10, Noise, of this EIR. As discussed therein, noise levels at the nearest sensitive noise receptors, approximately 200 feet from the project site boundaries, would range from 64 to 78 dB. The noise increase during construction would be of short duration and would likely occur primarily during daytime hours. The City of Sacramento's Noise Ordinance (Section 8.60.060 of the Municipal Code) exempts construction activities from the City's noise standards, provided that construction takes place between the hours of 7:00 AM and |



**Table 4.9-7
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| | | <p>6:00 PM Monday through Saturday and 9:00 AM and 6:00 PM Sundays and holidays. Although construction activities associated with the proposed project could result in infrequent periods of high noise, the construction noise would not be sustained and would only occur only during the City's permitted construction noise hours.</p> <p>Based on the above, the effects of construction noise associated with the proposed project have been evaluated in this EIR, and impacts related to such have been concluded to be less-than-significant.</p> |
| ERC-10.11 | <p>Hazardous Noise Protection. The City shall discourage outdoor activities or uses in areas within the 70 dBA CNEL airport noise contour where people could be exposed to hazardous noise levels.</p> | <p>As discussed under Impact 4.10-4 in Chapter 4.10, Noise, of this EIR, the project site is included within the SMF ALUCP. The site is generally located within the 60 to 65 dBA CNEL airport noise contours. More specifically, the project site is located approximately 0.43-mile outside of the 75 dBA CNEL noise contour. The normally acceptable noise environment for industrial uses is defined as a noise exposure level of less than 75 dBA CNEL. As such, the proposed project would not conflict with Policy ERC-10.11.</p> |
| Youth, Parks, Recreation, and Open Space | | |
| YPRO-1.5 | <p>Incentivizing Onsite Public Facilities. The City shall continue to provide Park Impact Fee (PIF) credit for development projects that provide publicly accessible parks, plazas, and parkways onsite that promote active or passive recreational opportunities and serve as neighborhood gathering points.</p> | <p>The proposed project would not include parks, plazas, and parkways. However, the project would be subject to the City's PIF. In addition, the proposed project primarily consists of industrial uses, with a limited number of commercial uses also proposed. Non-residential development employees are expected to use park facilities at a lesser rate than residents. Within the Remaining City, workers are not expected to use Neighborhood parks (which are typically designed to serve local residents only), but are expected to use Community and Citywide parks and facilities about 20 percent as much as local residents.¹³ Impacts were considered less than significant after application of these policies (Impacts 4.9-1 and 4.9-2).</p> <p>Thus, the project would not be anticipated to generate a substantial amount of new school-aged population within the City of Sacramento, as the project does not include new residential units and the majority of jobs</p> |

¹³ City of Sacramento. *City of Sacramento Park Impact Fee Nexus Study Update*. October 12, 2016.



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 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
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| | <p>created by the project would be filled primarily by those already residing within the region.</p> <p>Based on the above, the proposed project would not conflict with Policy YPRO-1.5.</p> |
| SMF Land Use Compatibility Plan | |
| <p>1.5.1 Land Use Actions for which Referral is Always Mandatory: Prior to approving any of the following types of Land Use Actions, the Local Agency (see Policy 1.2.24) always must refer the Land Use Action to the ALUC for determination of consistency with the Sacramento International Airport Land Use Compatibility Plan:</p> <ul style="list-style-type: none"> a) Local Agency adoption or approval of any new general or specific plan or any amendment thereto that affects lands within the Airport Influence Area. b) Local Agency adoption or approval of a zoning ordinance or building regulation, including any proposed change or variance to any such ordinance or regulation, that (1) affects land within the Airport Influence Area and (2) involves the types of airport impact concerns listed in Policy 1.3.1(b). | <p>As discussed in Section 4.9.3, Regulatory Setting, of this chapter, the SACOG Board of Directors serves as the ALUC for the project area. The project site is included within the Sacramento International Airport’s ALUCP, and the proposed project would include a GPA, as well as other entitlements. As noted in Chapter 3, Project Description, of this EIR, the ALUC is included as a Responsible and Trustee Agency. Thus, the ALUC will have access to the EIR and all associated technical reports for their review. Furthermore, on July 27, 2023, SACOG prepared an ALUC Preliminary Review¹⁴ to determine the proposed project’s compatibility with the SMF ALUCP. SACOG has provided the following conditions of approval, which will need to be completed for the proposed project:</p> <ol style="list-style-type: none"> 1. Dedication of an avigation easement to the County of Sacramento as owner of SMF for the areas within Safety Zones 3 and 4, and in the 65 CNEL noise contour (ALUCP Policy 4.1.1). For ease of implementation, it is recommended that the avigation easement cover the entire project site (e.g., portions within Safety Zone 6). The avigation easement will include language allowing “a continuing right-of-entry onto the property, with 48 hours advance notice, for the purposes of removing, altering, or mitigating exterior lighting that creates a visual airspace hazard.” 2. Filing of Federal Aviation Administration (FAA) Form 7460-1 for the Project through the FAA’s online system (https://oeaaa.faa.gov). Filing is required for the proposed project structures (top elevations for each corner and high-points of structures), as well as the construction cranes and/or any rooftop |

¹⁴ Sacramento Area Council of Governments. *ALUC Preliminary Review – Airport South Industrial*. July 27, 2023.



**Table 4.9-7
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| Policy | Project Consistency |
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| | <p>structures that may be proposed by future tenants (e.g., antennas or solar panels).</p> <ol style="list-style-type: none"> 3. Incorporation of sound attenuation measures to achieve an interior maximum of CNEL 45 dB for the proposed hotel and 50 dB for any office or noise-sensitive indoor spaces of the proposed warehouse distribution center located in the CNEL 65 dB noise contour. 4. Dedication of an aviation easement to the County of Sacramento as owner of SMF for the areas within Safety Zones 3 and 4, and in the 65 CNEL noise contour (ALUCP Policy 4.1.1). For ease of implementation, it is recommended that the aviation easement cover the entire project site (e.g., portions within Safety Zone 6). The aviation easement will include language allowing “a continuing right-of-entry onto the property, with 48 hours advance notice, for the purposes of removing, altering, or mitigating exterior lighting that creates a visual airspace hazard.” 5. Filing of Federal Aviation Administration (FAA) Form 7460-1 for the Project through the FAA’s online system (https://oeaaa.faa.gov). Filing is required for the proposed project structures (top elevations for each corner and high-points of structures), as well as the construction cranes and/or any rooftop structures that may be proposed by future tenants (e.g., antennas or solar panels). 6. Incorporation of sound attenuation measures to achieve an interior maximum of CNEL 45 dB for the proposed hotel and 50 dB for any office or noise-sensitive indoor spaces of the proposed warehouse distribution center located in the CNEL 65 dB noise contour. |
| <p>1.5.4. Major Land Use Actions: The scope or character of certain Major Land Use Actions, as listed below in Paragraphs (a) through (f), is such that their compatibility with Airport activity is a potential concern. Even though these actions may be basically consistent with the local general plan or specific plan, sufficient detail may not be known to enable a full airport compatibility evaluation at the time that the general plan or specific plan is reviewed. To enable better</p> | <p>According to Map 1, Compatibility Policy Map: Airport Influence Area, of the SMF Land Use Compatibility Plan, the project site is located within Referral Area 1. In addition, the proposed project includes multiple Major Land Use Actions listed in Policy 1.5.4, including requesting approval of a SOI Amendment and Prezone. As such, pursuant to Policy 1.5.4, this EIR and all associated technical reports shall be submitted to ALUC for review.</p> |



**Table 4.9-7
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| Policy | Project Consistency |
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| <p>assessment of compliance with the compatibility criteria set forth herein, ALUC review of these actions may be warranted. If there is uncertainty as to whether an action should be referred to the ALUC for review, Local Agencies should consult with the ALUC Secretary. The circumstances under which ALUC review of these actions is to be conducted are indicated in Policies 1.5.2 and 1.5.3 above.</p> <p>a) Actions Affecting Land Uses within Referral Area 1:</p> <ol style="list-style-type: none"> 1. Any proposed expansion of the sphere of influence of a city or special district. 2. Proposed pre-zoning associated with future annexation of land to a city. 3. Proposed development agreements or amendments to such agreements. 4. Proposed Residential Development, including land divisions, consisting of 5 or more dwelling units or parcels. 5. Any discretionary Development Proposal for Projects having a building floor area of 20,000 square feet or greater unless only ministerial approval (e.g., a building permit) is required. 6. Any discretionary Development Proposal for Projects expected to attract more than 100 people (including employees, customers/visitors) to outdoor activities to the Project site during a typical busy period. 7. Major infrastructure or other capital improvements (e.g., water, sewer, or roads) that would promote urban uses in undeveloped or agricultural areas to the extent that such uses are not reflected in a previously reviewed general plan or specific plan. 8. Any proposal for non-aviation use of land within Safety Zone 1. 9. Proposed land acquisition by a government entity for any facility (for example, a school or hospital) | |



**Table 4.9-7
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| <p>designed to accommodate more than 100 people during a typical busy period.</p> <p>10. Any proposed object (including buildings, poles, antennas, and other structures) having a height that requires review by the Federal Aviation Administration in accordance with Part 77 of the Federal Aviation Regulations.</p> <p>11. Any Project having the potential to create electrical or visual hazards to aircraft in flight, including:</p> <ul style="list-style-type: none"> • Electrical interference with radio communications or navigational signals; • Lighting which could be mistaken for Airport lighting; • Glare in the eyes of pilots of aircraft using the Airport; and • Impaired visibility near the Airport. <p>12. Any project having the potential to create a thermal plume extending to an altitude where aircraft fly.</p> <p>b) Actions Affecting Land Uses within Referral Area 2: Only the actions listed in Paragraphs (a)(10), (a)(11) and (a)(12) of this policy require referral to the ALUC for review.</p> <p>c) Proposed non-aviation development of Airport property if such development has not previously been included in an airport master plan or community general plan reviewed by the ALUC. (See Policy 1.2.11 for definition of aviation-related use.)</p> <p>d) Proposed Redevelopment (see Policy 1.2.35) if the Project is of a type listed in Paragraph (a) of this policy.</p> <p>e) Any other proposed Land Use Action, as determined by the Local Agency, involving a question of compatibility with Airport activities.</p> | |
| <p>2.1.2. Responsibilities for Project Consistency Analysis: The ALUC and Local Agencies are each responsible for analyzing a Project proposal for compliance with the compatibility criteria set forth in this Compatibility Plan.</p> | <p>See response to Policy 1.5.1, above. As discussed therein, the proposed project shall be formally referred to the ALUC; following submittal of this EIR, the ALUC will have the responsibility to prepare a consistency determination. Based on the analysis presented throughout this EIR, the</p> |



**Table 4.9-7
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|---|--|
| <ul style="list-style-type: none"> a) Local Agency staff may choose to initially evaluate proposed Projects and work with the Project applicant to bring the proposal into compliance with Compatibility Plan criteria. The ALUC Secretary will provide informal input at this stage if requested. b) When a proposed Project is formally referred to the ALUC, the ALUC Secretary shall review the proposal to determine if it is consistent with the Compatibility Plan policies. Projects of a type that require a formal consistency determination by the ALUC (those listed in Policy 1.5.1) will be placed on the agenda for action. c) Subsequent to when a Local Agency’s general plan and applicable specific plans have been determined by the ALUC to be consistent with the Compatibility Plan, the Local Agency and its staff are responsible for the consistency analysis of Major Land Use Actions. The ALUC Secretary will provide informal input if requested or the Local Agency can voluntarily refer the Land Use Action to the ALUC for a consistency determination. Land Use Actions for which referral to the ALUC is mandatory regardless of the general plan and specific plan consistency status (actions listed in Policy 1.5.1) must continue to be referred for a consistency determination by the ALUC. d) The Local Agency and its staff are responsible for ensuring that a development continues to comply with Compatibility Plan criteria on an on-going basis following completion of the Project (Intensity and height limitations in particular). | <p>proposed project is anticipated to be consistent with all applicable requirements of the SMF ALUCP.</p> |
| <p>3.1.1 Evaluating Compatibility of New Development: The compatibility of proposed land uses within Sacramento International Airport Influence Area shall be evaluated in accordance with:</p> <ul style="list-style-type: none"> a) The specific noise, safety, airspace protection, overflight, and other compatibility policies set forth in Sections 3.2 through 3.5 and in Section 4; | <p>See response to Policy 1.5.1, above. Furthermore, as discussed in Chapter 4.10, the project site is located within the 60 to 65 dBA CNEL airport noise contours. The normally acceptable noise environment for industrial uses is defined as a noise exposure level of less than 75 dBA CNEL. Therefore, noise levels related to the SMF at the project site would be within the City’s criteria for the normal acceptable noise environment. Based on the analysis presented throughout this EIR, the proposed</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|---|--|
| <ul style="list-style-type: none"> b) The criteria listed in Table 1, Noise Compatibility Criteria, and Table 2, Safety Compatibility Criteria; and c) The Compatibility Zones depicted on the Compatibility Policy Maps in this chapter. | project is anticipated to be consistent with all applicable requirements of the SMF ALUCP. |
| 3.2.1 Evaluating Noise Compatibility for New Development: The noise compatibility of proposed land uses within the influence area of Sacramento International Airport shall be evaluated in accordance with the policies set forth in this section, including the criteria listed in Table 1, Noise Compatibility Criteria and the noise exposure contours depicted on Map 2, Compatibility Policy Map: Noise. <ul style="list-style-type: none"> a) The criteria in Table 1 indicate the maximum acceptable Community Noise Equivalent Level (CNEL) exposure for new residential land uses and a range of nonresidential land uses. Within the various noise exposure ranges, each land use type is shown as being either “normally compatible,” “conditional,” or “incompatible.” b) “Normally Compatible” means that the proposed land use shall be presumed to be acceptable within locations having the indicated noise exposure. <ol style="list-style-type: none"> 1. Indoor uses are “normally compatible” if either: they involve activities that are inherently noisy; or, standard construction methods will sufficiently attenuate exterior noise to an acceptable indoor CNEL. For land use types that are compatible because of noise levels inherent with the activity, sound attenuation must be provided for associated office, retail, and other noise-sensitive indoor spaces sufficient to reduce exterior noise to an interior maximum of CNEL 50 dB. 2. Outdoor uses are “normally compatible” if the activities associated with the land use may be carried out with minimal interference from aircraft noise at the indicated CNEL. | See response to Policies 1.5.1 and 3.1.1, above. |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|---|---|
| <p>c) “Conditional” means that the conditions indicated in Table 1 must be satisfied in order for the proposed land use to be acceptable.</p> <ol style="list-style-type: none"> 1. Indoor uses must have building structures that are capable of attenuating exterior noise from all noise sources to the indoor CNEL indicated by the number in the cell. 2. The acceptability of outdoor uses is dependent upon characteristics of the specific use. Caution should be exercised with regard to Noise-Sensitive Outdoor Land Uses because these uses are likely to be disrupted by aircraft noise events. This caution is directed at the Project proponent and is not intended to preclude approval of the Project. <p>d) “Incompatible” means that the proposed land use shall not be allowed under any circumstances except as noted in Paragraph (3) below.</p> <ol style="list-style-type: none"> 1. Indoor uses would have unacceptable noise levels if windows are open. At exposures above CNEL 65 dB, extensive mitigation techniques would be required to make the indoor environment acceptable for performance of activities associated with the land use even with windows closed. 2. Outdoor uses would be exposed to severe noise interference that would prevent performance of activities associated with the land use. 3. Exceptions to an “incompatible” designation may only be made if site-specific special conditions exist. See Policy 4.1.5. | |
| <p>3.3.1. Evaluating Safety Compatibility for New Development: The safety compatibility of proposed land uses within the influence area of Sacramento International Airport shall be evaluated in accordance with the policies set forth in this section, including the criteria listed in Table 2, Safety Compatibility Criteria, and the</p> | <p>See response to Policies 1.5.1 and 3.1.1, above.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|---|
| <p>safety zones depicted on Map 3, Compatibility Policy Map: Safety.</p> <ul style="list-style-type: none"> a) The criteria in Table 2 indicate whether a particular type of land use is “normally compatible,” “conditional,” or “incompatible” with the exposure to Sacramento International Airport aircraft accident risks. b) “Normally Compatible” means that the proposed Land Use Action is presumed to comply with the indicated Intensity limits and other criteria for the zone. However, atypical examples of a use may require review to ensure compliance with the criteria. c) “Conditional” means that the proposed Land Use Action must comply with the conditions listed in the table. d) “Incompatible” means that proposed Land Use Action shall not be permitted under any normal circumstances within the indicated safety zone. Limited exceptions are possible for site-specific special conditions. See Policy 4.1.5. | |
| <p>3.3.3. Nonresidential Development Criteria: Proposed Nonresidential Development shall be evaluated in accordance with the following criteria:</p> <ul style="list-style-type: none"> a) The usage Intensity (people per acre) limit indicated in Table 2 for each safety zone is the fundamental criterion against which the safety compatibility of most nonresidential land uses shall be measured. The Intensity limits set the total number of occupants allowed on the Project site during normal busy use. Other criteria may be applicable to uses of special concern (see Policy 3.3.7). b) All nonresidential uses, including uses listed in Table 2, Safety Compatibility Criteria, as “Normally Compatible,” must comply with both the “sitewide average” and “single-acre” usage Intensity limits indicated below and listed in Table 2 for each safety zone. <ul style="list-style-type: none"> 1. The “sitewide average” Intensity equals the total number of people expected to be on the entire site | <p>See response to Policies 1.5.1 and 3.1.1, above.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|---------------------|
| <p>divided by the site size in acres (i.e., the gross acreage of the project site).</p> <p>2. The “single-acre” Intensity equals the number of people expected to occupy the most intensively used 1.0-acre area(s) of the site.</p> <p>c) The need to calculate the usage Intensity of a particular Project proposal for compliance with the Intensity criteria in the Paragraph (b) table is to be governed by the following:</p> <ol style="list-style-type: none"> 1. Land use categories indicated in Table 2 as “Normally Compatible” for a particular safety zone are presumed to meet the Intensity criteria indicated in the Paragraph (b) table. Unless the particular Project proposal represents an atypical example of the usage type, calculation of the usage Intensity is not required. 2. Calculation of the usage Intensity must be done for all proposed Projects where the land use category for the particular safety zone is indicated in Table 2 as “Conditional” and the criteria column says “Ensure Intensity criteria are met.” 3. Where Table 2 indicates that land use category is “Conditional” for the particular safety zone, but the criteria are other than “Ensure Intensity criteria are met,” calculation of the usage Intensity is not necessary for typical examples of the use. However, the Project proposal must comply with the other criteria listed for the applicable land use category and safety zone. <p>d) No new structures intended to be occupied regularly are allowed in Safety Zone 1.</p> <p>e) Usage Intensity calculations shall include all people (e.g., employees, customers/visitors) who may be on the Project site at any single point in time, whether indoors or outdoors.</p> | |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|---------------------|
| <p>1. For the purposes of these calculations, the total number of occupants during normal busiest periods shall be used.</p> <p>2. The Project site may be composed of multiple parcels.</p> <p>f) Each component use within a Nonresidential Development that has multiple types of uses shall comply with the safety criteria in Table 2, Safety Compatibility Criteria, unless the use is ancillary to the primary use.</p> <p>1. To be considered an Ancillary Use, the use must be associated with the primary use (e.g. a cafeteria in an office building) and occupy no more than 10% of total building floor area.</p> <p>2. Ancillary Uses must be considered in the sitewide average Intensity limits, but may be excluded from the single-acre Intensity calculations.</p> <p>3. An Ancillary Use may be more intensively occupied (more people in a given area) than the primary use, provided that the Ancillary Use is neither:</p> <ul style="list-style-type: none"> • An assembly room having more than 750 square feet of floor area (this criterion is intended to parallel building code standards) and a capacity of 50 people; nor • A K-12 school, day care center, or other risk-sensitive use that is “incompatible” within the safety zone where the primary use is to be located. <p>g) Other criteria may be applicable to uses of special concern (see Policy 3.3.7 and conditions in Table 2, Safety Compatibility Criteria).</p> <p>h) Local Agencies may make exceptions for “Conditional” or “Incompatible” land uses associated with rare special events (e.g., an air show at the Airport) for which a facility is not designed and normally not used and for which extra safety precautions can be taken as appropriate.</p> | |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | | Project Consistency |
|--------|---|--|
| 3.4.1 | <p>Evaluating Airspace Protection / Object Height Compatibility for New Development: The object height compatibility of proposed land uses within the influence area of Sacramento International Airport shall be evaluated in accordance with the policies in this section, including the Airspace Protection Surfaces depicted on Maps 4a, 4b, and 4c, Compatibility Policy Maps: Airspace Protection/Object Heights.</p> <p>a) The airspace protection/height limit surfaces are drawn in accordance with Federal Aviation Regulations Part 77, Subpart C, and reflect the runway lengths, runway end locations, and approach types for each of the three runway configuration scenarios: existing, north-only extension of east runway, and split extension of east runway. Maps 4a, 4b, and 4c depict the approach protection/height limit surfaces for these respective scenarios.</p> <p>b) The Critical Airspace Protection Zone consists of the Federal Aviation Regulations Part 77 primary surface and the area beneath portions of the approach and transitional surfaces to where these surfaces intersect with the horizontal surface.</p> | <p>See response to Policy 1.5.1, above. The M-1-PUD zoning district allows for buildings with a maximum height of 70 feet and the HC-PUD zoning district allows for buildings with a maximum height of 35 feet. According to the proposed PUD Guidelines, the maximum building height for the hotel in the proposed HC-PD zone would be 80 feet. Following approval of an SOI Amendment and Annexation, it is anticipated that the proposed industrial buildings would comply with the height requirements of the M-1-PUD zoning district. With the exception of the proposed hotel, the commercial uses (i.e., restaurants and a fueling station/carwash) would comply with the height requirements of the HC-PUD zoning district. The proposed project would comply with the requirements of Airspace Protection Surfaces, depicted on Maps 4a, 4b, and 4c of the SMF ALUCP.</p> |
| 3.4.2 | <p>Object Height Criteria: The criteria for determining the acceptability of a Project with respect to height shall be based upon the standards set forth in Federal Aviation Regulations Part 77, Subpart C, Safe, Efficient Use and Preservation of the Navigable Airspace and applicable airport design standards published by the FAA. Additionally, where an FAA aeronautical study of a proposed object is required as described in Policy 3.4.5, the results of that study shall be taken into account by the ALUC and the Local Agency.</p> <p>a) Except as provided in Paragraphs (b) and (c) of this policy, no object, including a mobile object such as a vehicle or temporary object such as construction crane, shall have a height that would result in penetration of an Airspace Protection Surface depicted for Sacramento International Airport on Maps 4a, 4b, or 4c. Any object that penetrates</p> | <p>See response to Policies 1.5.1 and 3.4.1, above.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|---------------------|
| <p>one of these surfaces is, by FAA definition, deemed an obstruction.</p> <p>b) Objects not situated within a Critical Airspace Protection Zone (see Policy 3.4.1(b)) may be allowed to have heights that penetrate the Airspace Protection Surfaces defined by Federal Aviation Regulations Part 77 criteria.</p> <ol style="list-style-type: none"> 1. The maximum allowable height for these objects is 35 feet above ground level. 2. The height of all objects is subject to Local Agency zoning limits. <p>c) Unless exempted under Paragraph (b) of this policy, a proposed object having a height that exceeds the Airport's Airspace Protection Surface shall be allowed only if all of the following apply:</p> <ol style="list-style-type: none"> 1. As the result of an aeronautical study, the FAA determines that the object would not be a hazard to air navigation. 2. FAA or other expert analysis conducted under the auspices of the ALUC or SCAS as Airport owner concludes that, despite being an airspace obstruction (not necessarily a hazard), the object would not cause any of the following: <ul style="list-style-type: none"> • An increase in the ceiling or visibility minimums of the Airport for an existing or planned instrument procedure (a planned procedure is one that is formally on file with the FAA); • A diminution of the established operational efficiency and capacity of the Airport, such as by causing the usable length of the runway to be reduced; or • Conflict with the visual flight rules (VFR) airspace used for the Airport traffic pattern or en route navigation to and from the Airport. 1. Marking and lighting of the object will be installed as directed by the FAA aeronautical study or the | |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|---|--|
| <p>California Division of Aeronautics and in a manner consistent with FAA standards in effect at the time the construction is proposed.²⁷</p> <ol style="list-style-type: none"> 2. An Avigation Easement is dedicated, in accordance with Policy 4.1.1, to the County of Sacramento as owner of the Airport. 3. The proposed Project/plan complies with all policies of this Compatibility Plan related to noise and safety compatibility. | |
| <p>3.4.3. Evaluating Airspace Protection/Wildlife Hazard Compatibility for New Development: The foundation for regulation of land uses that could attract hazardous wildlife on and near airports is set by the federal government. The ALUC’s role and policy with regard to regulating wildlife hazards in the Airport environs is limited to new development as well as general plans, specific plans, master plans, and zoning ordinances that set standards for new development. The ALUC has no authority to regulate Existing Land Uses, including agriculture, even if these uses include land use characteristics that attract hazardous wildlife.</p> <ol style="list-style-type: none"> a) Any proposed Land Use Project that could attract wildlife to the Airport Influence Area is a potential concern. Federal regulations and guidelines referred to above identify specific land uses that the federal government deems incompatible near airports. b) Crop selection and other routine agricultural activities that do not involve construction or otherwise constitute a Land Use Project and do not need Local Agency approval are not subject to ALUC authority and are not regulated by the policies of this Compatibility Plan. c) For proposed Land Use Projects to be located within 10,000 feet of the Sacramento International Airport Air Operations Area (AOA; see Map 5) and that include a zoning amendment and that could attract hazardous wildlife, the project proponent shall document consideration of current | <p>See response to Policy 1.5.1 and City of Sacramento 2040 General Plan Policy ERC-2.8.</p> |



**Table 4.9-7
 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion**

| Policy | Project Consistency |
|--|--------------------------------------|
| <p>FAA or other federal regulations and guidelines pertaining to hazardous wildlife attractants.</p> <p>d) Elsewhere within the Airport Influence Area, but beyond 10,000 feet from the AOA, or for projects within 10,000 feet from the AOA that do not include a zoning amendment, a formal Project review and compatibility determination by the ALUC shall not be required. It is recommended that the project proponent consider current FAA or other federal regulations and guidelines pertaining to hazardous wildlife attractants.</p> | |
| <p>3.4.4. Other Flight Hazards: Land uses that may cause visual or electronic hazards, to aircraft in flight or taking off or landing at the Airport shall be allowed within the Airport Influence Area only if the uses are consistent with FAA rules and regulations.</p> <p>a) Specific characteristics to be avoided, especially within areas beneath the Airspace Protection Surfaces (see Map 5), include:</p> <ol style="list-style-type: none"> 1. Sources of glare (such as from mirrored or other highly reflective buildings or building features) or bright lights (including search lights and laser light displays); 2. Distracting lights that could be mistaken for airport lights; 3. Sources of dust, steam, or smoke that may impair pilots' vision; 4. Sources of steam or other emissions that cause thermal plumes or other forms of unstable air; and 5. Sources of electrical interference with aircraft communications or navigation. <p>b) To resolve any uncertainties with regard to the significance of the above types of flight hazards, Local Agencies should consult with FAA and Sacramento International Airport officials.</p> | <p>See response to Policy 1.5.1.</p> |



4.10 NOISE

4.10 NOISE

4.10.1 INTRODUCTION

The Noise chapter of the EIR describes the existing noise environment in the project vicinity, and identifies potential impacts and mitigation measures related to noise and vibration associated with construction and operation of the proposed project. The method by which the potential impacts are analyzed is discussed, followed by the identification of potential impacts and the recommended mitigation measures designed to reduce significant noise and vibration impacts to less-than-significant levels, if required. The Noise chapter is primarily based on the Environmental Noise Assessment prepared for the proposed project by Saxelby Acoustics, LLC. (Saxelby) (see Appendix J),¹ as well as the City of Sacramento 2040 General Plan² and the City of Sacramento 2040 Master EIR (MEIR).³

As discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City of Sacramento limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

4.10.2 EXISTING ENVIRONMENTAL SETTING

The Existing Environmental Setting section provides background information on noise and vibration, a discussion of acoustical terminology and the effects of noise on people, existing sensitive receptors in the project vicinity, existing sources and noise levels in the project vicinity, and groundborne vibration.

Fundamentals of Acoustics

Decibels (dB) are logarithmic units that compare the wide range of sound intensities to which the human ear is sensitive. The perceived loudness of sounds is dependent upon many factors, including sound pressure level and frequency content. However, within the typical range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by filtering the frequency response of a sound level meter by means of the standardized A-weighting network. A-weighting of sound levels best reflects the human ear's reduced sensitivity to low frequencies, and the use of A-weighted sound level, expressed as dBA, has become the standard tool of environmental noise assessment. Table 4.10-1 lists several examples of the noise levels associated with common situations.

¹ Saxelby Acoustics, LLC. *Environmental Noise Assessment: Airport South Industrial Park*. April 24, 2024.

² City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

³ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



**Table 4.10-1
 Typical Noise Levels**

| Common Outdoor Activities | Noise Level (dBA) | Common Indoor Activities |
|---|-------------------|--|
| N/A | 110 | Rock Band |
| Jet Fly-over at 300 meters (1,000 feet) | 100 | N/A |
| Gas Lawn Mower at 1 meter (3 feet) | 90 | N/A |
| Diesel Truck at 15 meters (50 feet), at 80 km/hr. (50 mph) | 80 | Food Blender at 1 meter (3 feet) Garbage Disposal at 1 meter (3 feet) |
| Noisy Urban Area, Daytime Gas Lawn Mower, 30 meters (100 feet) | 70 | Vacuum Cleaner at 3 meters (10 feet) |
| Commercial Area Heavy Traffic at 90 meters (300 feet) | 60 | Normal Speech at 1 meter (3 feet) |
| Quiet Urban Daytime | 50 | Large Business Office Dishwasher in Next Room |
| Quiet Urban Nighttime | 40 | Theater, Large Conference Room (Background) |
| Quiet Suburban Nighttime | 30 | Library |
| Quiet Rural Nighttime | 20 | Bedroom at Night, Concert Hall (Background) |
| N/A | 10 | Broadcast/Recording Studio |
| Lowest Threshold of Human Hearing | 0 | Lowest Threshold of Human Hearing |

Source: Caltrans, Technical Noise Supplement, Traffic Noise Analysis Protocol. September 2013.

Community Noise Equivalent Level (CNEL), which can be used to compare the noise level of neighborhoods, is the weighted average noise level over time, presented in dB. Community noise is also commonly described in terms of the ambient noise level, which is defined as the overall noise level associated with a given environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (L_{eq}). The L_{eq} is the foundation of the day-night average noise descriptor (DNL or L_{dn}) and represents a correlation with community response to noise.

DNL/ L_{dn} is based on the average noise level over 24 hours, with an additional 10 dB weighting applied to noise that occurs during nighttime hours (10:00 PM to 7:00 AM). The 10 dB nighttime penalty is applied to account for the assumption that people are more sensitive to nighttime noise exposures as compared to daytime noise exposures.

Stationary sources of noise, including construction equipment, attenuate at a rate of approximately six dB per doubling of distance from the source depending on ground absorption. Physical barriers located between a noise source and the noise receptor, such as berms or sound walls, increase the efficacy of noise attenuation that occurs by distance alone.

Surrounding Land Uses and Existing Sensitive Receptors

The site is bound to the north by Interstate 5 (I-5) and to the east by the City of Sacramento (City). A portion of Bayou Way is located within the project site and is generally laid out in an east-to-west direction. Land uses surrounding the project site include a Life Storage facility, Egret Park, and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south;



undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5.

Certain land uses are more sensitive to ambient noise levels than others due to the amount of noise exposure (in terms of both exposure time and shielding from noise sources) and the type of activities typically involved. Noise sensitive land uses typically include residences, schools, childcare centers, hospitals, long-term health care facilities, convalescent centers, retirement homes, and recreation areas. Sensitive noise receptors may also include threatened or endangered noise sensitive biological species; however, many jurisdictions have not adopted noise standards for wildlife areas. Noise sensitive land uses are typically given special attention in order to achieve protection from excessive noise.

The closest noise sensitive receptors to the project site are the single-family residences, park, and the Paso Verde K-8 School located approximately 200 feet east and south of the project site.

Existing Ambient Noise Environment

The existing ambient noise environment in the project vicinity is primarily defined by traffic on I-5 and operation of the Sacramento International Airport. To quantify the existing ambient noise environment in the project vicinity, Saxelby conducted continuous (24-hour) noise level measurements at four locations, to the south and east of the project site, as shown in Figure 4.10-1.

The sound level meters were programmed to record the maximum, median, and average noise levels at each site during the survey. The maximum value, denoted as L_{max} , represents the highest noise level measured. The average value, denoted as L_{eq} , represents the energy average of all of the noise received by the sound level meter microphone during the monitoring period. The median value, denoted as L_{50} , represents the sound level exceeded 50 percent of the time during the monitoring period.

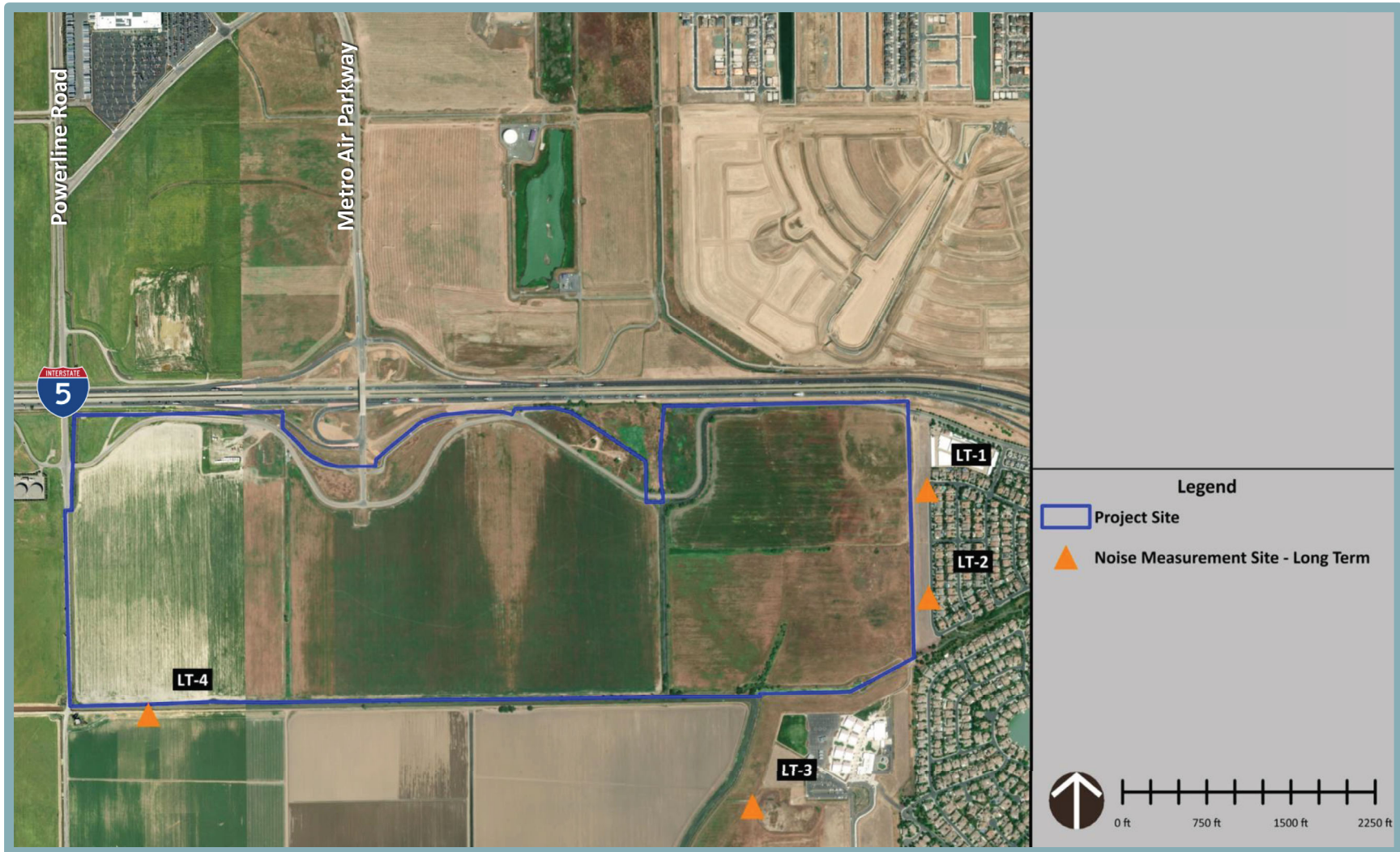
A summary of the noise level measurement survey results is provided in Table 4.10-2. As shown in Table 4.10-2, the average measured on-site noise levels were 63 dB L_{dn} at LT-1 and LT-4, and 64 dB L_{dn} at LT-2 and LT-3.

Saxelby also evaluated the existing traffic noise levels at the nearest sensitive receptors along each roadway segment in the project area, the results of which are presented in Table 4.10-3, below.

It should be noted that the Sacramento International Airport is located approximately 1.6 miles north of the project site and aircraft overflights were observed by Saxelby during visits to the project site; the project site is located within the Airport Land Use Compatibility Plan (ALUCP). The project site is generally located within the 60 to 65 dBA CNEL airport noise contours. Figure 4.10-2 shows the noise contours for the airport, pursuant to the Sacramento County General Plan.



**Figure 4.10-1
Noise Measurement Locations**



Source: Saxelby Acoustics, LLC., 2024.



**Table 4.10-2
 Summary of Existing Background Noise Measurement Data**

| Location | Date | L _{dn} | Daytime L _{eq} | Daytime L ₅₀ | Daytime L _{max} | Nighttime L _{eq} | Nighttime L ₅₀ | Nighttime L _{max} |
|--|----------------|-----------------|----------------------------|----------------------------|-----------------------------|------------------------------|------------------------------|-------------------------------|
| LT-1: 920 feet from I-5 | 3/29/2022 | 62 | 58 | 51 | 75 | 56 | 53 | 68 |
| | 3/30/2022 | 67 | 62 | 56 | 75 | 61 | 53 | 77 |
| | 3/31/2022 | 60 | 56 | 53 | 70 | 54 | 52 | 68 |
| | Average | 64 | 59 | 54 | 74 | 58 | 53 | 73 |
| LT-2: 1,870 feet from I-5 | 3/29/2022 | 59 | 55 | 42 | 75 | 52 | 47 | 65 |
| | 3/30/2022 | 57 | 55 | 45 | 75 | 50 | 41 | 66 |
| | 3/31/2022 | 58 | 53 | 49 | 69 | 52 | 48 | 67 |
| | Average | 58 | 54 | 46 | 74 | 51 | 46 | 66 |
| LT-3: 850 feet from Paso Verde K-8 School | 3/29/2022 | 60 | 57 | 42 | 77 | 53 | 46 | 67 |
| | 3/30/2022 | 60 | 59 | 44 | 79 | 53 | 43 | 67 |
| | 3/31/2022 | 73 | 74 | 46 | 74 | 53 | 46 | 66 |
| | Average | 69 | 69 | 44 | 77 | 53 | 45 | 67 |
| LT-4: 740 feet from Power Line Road | 3/29/2022 | 64 | 62 | 55 | 79 | 56 | 49 | 71 |
| | 3/30/2022 | 62 | 60 | 53 | 80 | 55 | 47 | 68 |
| | 3/31/2022 | 63 | 58 | 53 | 75 | 57 | 50 | 67 |
| | Average | 63 | 60 | 54 | 78 | 56 | 49 | 69 |

Notes:

- All values are shown in dBA.
- Daytime hours: 7:00 AM to 10:00 PM; Nighttime hours: 10:00 PM to 7:00 AM.



**Table 4.10-3
 Baseline Traffic Noise Levels**

| Roadway | Segment | Existing Exterior Noise Level (dBA L _{dn}) at Closest Sensitive Receptors |
|---|---|---|
| Metro Air Parkway | I-5 to Pacific Gateway Drive | 42.4 |
| Metro Air Parkway | Pacific Gateway Drive to Meister Way | 43.2 |
| Metro Air Parkway | Meister Way to Elkhorn Boulevard | 43.0 |
| West Elkhorn Boulevard | Lone Tree Road to Baidee Drive | 58.7 |
| Power Line Road | Garden Highway to Del Paso Road | 33.8 |
| Power Line Road | Bayou Way to Del Paso Road | 53.2 |
| Power Line Road | Bayou Way to Pacific Gateway Drive | 56.7 |
| Power Line Road | West Elkhorn Boulevard to Pacific Gateway Drive | 27.7 |
| Del Paso Road | Power Line Road to Hovnanian Drive | 49.7 |
| El Centro Road | Del Paso Road to Hawkview Drive | 47.2 |
| El Centro Road | Hawkview Drive to Bayou Way | 56.5 |
| Garden Highway | Power Line Road to Radio Road | 47.1 |
| Garden Highway | Radio Road to San Juan Road | 52.3 |
| Garden Highway | San Juan Road to City Limit | 50.7 |
| Metro Air Parkway | I-5 to Airport South Industrial Drive | - |
| Airport South Industrial Drive | Power Line Road to Metro Air Parkway | - |
| Airport South Industrial Drive | METRO Air Parkway to "A" Drive | - |
| "A" Drive | Airport South Industrial Drive to Bayou Way | - |
| Bayou Way | A Drive to El Centro Road | 58.8 |
| <i>Source: Saxelby Acoustics, LLC., 2024.</i> | | |

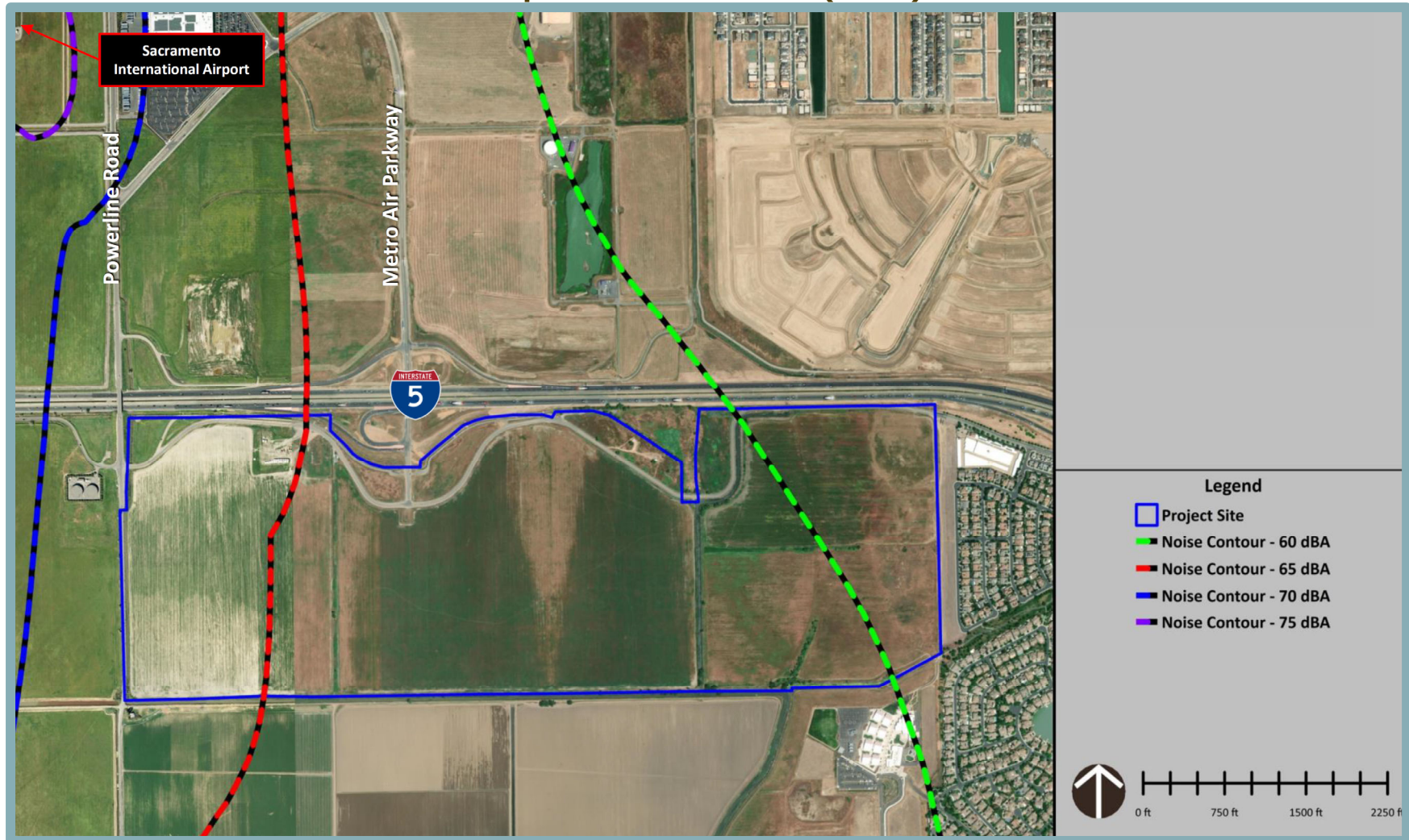
Fundamentals of Vibration

Vibration is similar to noise in that both involve a source, a transmission path, and a receiver. However, while noise is generally considered to be pressure waves transmitted through air, vibration is usually associated with transmission through the ground or structures. As with noise, vibration consists of an amplitude and frequency. A person's response to vibration depends on their individual sensitivity, as well as the amplitude and frequency of the source.

Vibration can be described in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of velocity in inches per second (in/sec) peak particle velocities (PPV) or root-mean-square (VdB, RMS). Standards pertaining to perception, as well as damage to structures, have been developed for vibration in terms of PPV and RMS velocities. As vibrations travel outward from the source, they excite the particles of rock and soil through which they pass and cause them to oscillate.



**Figure 4.10-2
Airport Noise Contours (CNEL)**



Source: Saxelby Acoustics, LLC., 2024.



Differences in subsurface geologic conditions and distance from the source of vibration result in different vibration levels characterized by different frequencies and intensities. In all cases, vibration amplitudes decrease with increasing distance.

Human response to vibration is difficult to quantify. Vibration can be felt or heard well below the levels that produce any damage to structures. The duration of the event has an effect on human response, as does frequency. Generally, as the duration and vibration frequency increase, the potential for adverse human response increases. According to the California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual, operation of construction equipment and construction techniques generate ground vibration. Roadway traffic can also be a source of such vibration. At high enough amplitudes, ground vibration has the potential to damage structures and/or cause cosmetic damage. However, traffic rarely generates vibration amplitudes high enough to cause structural or cosmetic damage.

Existing Sources of Vibration

The project site is currently undeveloped and the existing residential and agricultural uses in the project vicinity are not typical sources of vibration. In addition, the self-storage facility located east of the project site is unlikely to generate substantial levels of vibration. However, vehicle traffic from I-5 and air traffic from the Sacramento International Airport to the north of the project site does constitute an existing source of vibration.

4.10.3 REGULATORY CONTEXT

In order to limit exposure to physically and/or psychologically damaging noise levels, the State of California, various county governments, and most municipalities in the State have established standards and ordinances to control noise. Applicable federal laws or regulations pertaining to noise or vibration that would directly apply to the proposed project do not exist. The following provides a general overview of the existing State and local regulations that are relevant to the proposed project.

State Regulations

The following are the State environmental laws and policies relevant to noise.

California Building Code

The California Building Code (Title 24, Part 2 of the California Code of Regulations [CCR]) establishes uniform minimum noise insulation performance standards to protect persons within new buildings that house people, including hotels, motels, dormitories, apartment houses, and dwellings other than single-family dwellings. Title 24 mandates that interior noise levels attributable to exterior sources shall not exceed 45 dB L_{dn} or CNEL in any habitable room. Title 24 also requires that for structures containing noise-sensitive uses to be located where the L_{dn} or CNEL exceeds 60 dB, an acoustical analysis must be prepared to identify mechanisms for limiting exterior noise to the prescribed allowable interior levels. If the interior allowable noise levels are met by requiring that windows be kept closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment.

Local Regulations

The following are the local environmental goals and policies relevant to noise and vibration.



City of Sacramento 2040 General Plan

The City of Sacramento 2040 General Plan Environmental Constraints Element contains policies for assessing noise impacts within the City. The following goals and policies related to noise and vibration are applicable to the proposed project.

Environmental Resources and Constraints Element

Goal ERC 10 A healthy sound environment conducive to living and working.

Policy ERC-10.1 **Exterior Noise Standards.** The City shall require noise mitigation for all development where the projected exterior noise levels exceed those shown in Table ERC-1 (recreated as Table 4.10-4, below) to the extent feasible.

| Table 4.10-4 Exterior Noise Compatibility Standards for Various Land Uses | |
|--|---|
| Land Use Type | Highest Level of Noise Exposure that is Regarded as "Normally Acceptable" (L_{dn} or CNEL) |
| Residential – Low Density Single Family, Duplex, Mobile Homes | 60 dBA |
| Residential – Multi-family | 65 dBA |
| Urban Residential Infill and Mixed-Use Projects | 70 dBA |
| Transient Lodging – Motels, Hotels | 65 dBA |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | 70 dBA |
| Auditoriums, Concert Halls, Amphitheaters | Mitigation based on site-specific study |
| Sports Arena, Outdoor Spectator Sports | Mitigation based on site-specific study |
| Playgrounds, Neighborhood Parks | 70 dBA |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | 75 dBA |
| Office Buildings – Business, Commercial, and Professional | 70 dBA |
| Industrial, Manufacturing, Utilities, Agriculture | 75 dBA |

Source: City of Sacramento 2040 General Plan [Table ERC-1], 2024.

Policy ERC-10.2 **Noise Source Control.** The City should require noise impacts in new developments to be controlled at the noise source where feasible, as opposed to the receptor end, using techniques including but not limited to the following:

- Site design,
- Building orientation,
- Building design, and
- Hours of operation.

Policy ERC-10.3 **Interior Noise Standards.** The City shall require new development to include noise attenuation to assure



acceptable interior noise levels appropriate to the land use, as follows:

- 45 dBA Ldn for residential, transient lodgings, hospitals, nursing homes, and other uses where people normally sleep; and
- 45 dBA Leq (peak hour with windows closed) for office buildings and similar uses.

Policy ERC-10.4 **Interior Noise Review for Multiple, Loud Short-Term Events.** In cases where new development is proposed in areas subject to frequent, high-noise events (such as aircraft over-flights, or train and truck pass-bys), the City shall evaluate interior noise impacts at proposed sensitive receptors. The evaluation shall incorporate measures necessary to meet the 45 dBA Ldn standard.

Policy ERC-10.5 **Interior Vibration Standards.** The City shall require construction projects that are anticipated to generate significant vibration levels to use appropriate methods (i.e., type of equipment, low-impact tools, modifying operations, increasing setback distance, vibration monitoring) to ensure acceptable interior vibration levels at nearby residential and commercial uses based on the current City or Federal Transit Administration (FTA) criteria.

Policy ERC-10.6 **Effects of Vibration.** The City shall consider potential effects of vibration when reviewing new residential and commercial projects that are proposed in the vicinity of rail lines or light rail lines.

Policy ERC-10.7 **Vibration.** The City shall consider the potential for vibration-induced damage associated with construction activities, highways, and rail lines in close proximity to historic buildings and archaeological sites. Where there is potential for substantial vibration-induced damage, the City shall require preparation of a Pre-Construction Survey and Vibration Management and Monitoring Plan, prepared by a qualified historic preservation specialist or structural engineer to document existing conditions, present appropriate methods to avoid or reduce potential vibration damage, monitor for excessive vibration, and ensure any damage is documented and repaired.

Policy ERC-10.8 **Alternative Paving Materials.** The City shall continue to explore opportunities to use alternative pavement materials such as rubberized asphalt and porous pavement on residential roadways in order to reduce noise generation, extend maintenance cycles, and improve air quality and stormwater management.



- Policy ERC-10.9 **Construction Noise Controls.** The City shall limit the potential noise impacts of construction activities on surrounding land uses through noise regulations in the City Code that address permitted days and hours of construction, types of work, construction equipment, and sound attenuation devices.
- Policy ERC-10.10 **Airport Land Use Compatibility.** The City shall restrict new residential development within the 65 dBA CNEL airport noise contour, or in accordance with plans prepared by the Airport Land Use Commission and shall only approve noise-compatible land uses.
- Policy ERC-10.11 **Hazardous Noise Protection.** The City shall discourage outdoor activities or uses in areas within the 70 dBA CNEL airport noise contour where people could be exposed to hazardous noise levels.

City of Sacramento Municipal Code

The City of Sacramento Municipal Code, Section 8.68.060 establishes an allowable exterior noise level limit of 55 dBA L_{50} and 75 dBA L_{max} during daytime (7:00 AM to 10:00 PM) hours and 50 dBA L_{50} and 70 dBA L_{max} during nighttime (10:00 PM to 7:00 AM) hours for sources of noise which occur for more than 30 minutes per hour (L_{50}).

If the existing ambient noise level exceeds the 50/55 dBA L_{50} standard, the allowable limit is increased in 5 dBA increments to encompass the ambient noise level. If the existing ambient noise level exceeds the 70/75 dBA L_{max} noise standard, the limit becomes the measured L_{max} existing ambient noise level. For example, if measured existing ambient daytime noise levels are 57 dBA L_{50} and 77 dBA L_{max} , the noise ordinance limits would be 62 dBA L_{50} and 77 dBA L_{max} . The City of Sacramento Municipal Code standards are summarized in Table 4.10-5, below.

| Table 4.10-5 Stationary Noise Source Noise Standards | | |
|---|---|---|
| Noise Level Descriptor | Outdoor Activity Areas Daytime (7 AM to 10 PM) | Outdoor Activity Areas Nighttime (10 PM to 7 AM) |
| Hourly equivalent sound level (L_{50}), dB | 55 | 50 |
| Maximum sound level (L_{max}), dB | 75 | 70 |
| <i>Source: City of Sacramento Municipal Code, Section 8.68.060.</i> | | |

4.10.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project’s potential impacts related to noise and vibration. In addition, a discussion of the project’s impacts, as well as mitigation measures where necessary, is also presented.



Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, the effects of a project are evaluated to determine if they would result in a significant adverse impact on the environment. For the purposes of this EIR, an impact is considered significant if the proposed project would result in any of the following:

- 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;
- Generation of excessive groundborne vibration or groundborne noise levels; or
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

Summary of Applicable Noise Standards

According to the City of Sacramento, the proposed project, which shall be considered to be a “Stationary” noise source, shall not be permitted to generate noise levels exceeding 55 dBA L₅₀ or 75 dBA L_{max} during daytime (7:00 AM to 10:00 PM) hours and 50 dBA L₅₀ or 70 dBA L_{max} during nighttime (10:00 PM to 7:00 AM) hours at the adjacent noise sensitive receptors.

Generally, a project may have a significant effect on the environment if it will substantially increase the ambient noise levels for adjoining areas or expose people to severe noise levels. In practice, more specific professional standards have been developed. The standards state that a noise impact may be considered significant if it would generate noise that would conflict with local project criteria or ordinances, or substantially increase noise levels at noise sensitive land uses. The potential increase in traffic noise from the project is a factor in determining significance. Research into the human perception of changes in sound level indicates the following:

- A 3-dB change is barely perceptible;
- A 5-dB change is clearly perceptible; and
- A 10-dB change is perceived as being twice or half as loud.

A limitation of using a single noise level increase value to evaluate noise impacts is that it fails to account for pre-project noise conditions. Table 4.10-6 is based upon recommendations made by the Federal Interagency Committee on Noise (FICON) to provide guidance in the assessment of changes in ambient noise levels resulting from aircraft operations. The recommendations are based upon studies that relate aircraft noise levels to the percentage of persons highly annoyed by the noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, it has been accepted that they are applicable to all sources of noise described in terms of cumulative noise exposure metrics such as the L_{dn}.

| Table 4.10-6 Significance of Changes in Noise Exposure | |
|---|---|
| Ambient Noise Level Without Project, L_{dn} | Increase Required for Significant Impact |
| <60 dB | +5.0 dB or more |
| 60 – 65 dB | +3.0 dB or more |
| >65 dB | +1.5 dB or more |

Source: Federal Interagency Committee on Noise (FICON)



Based on the Table 4.10-6 data, an increase in the traffic noise level of 5 dB or more would be significant where the pre-project noise levels are less than 60 dB L_{dn}, or 3 dB or more where existing noise levels are between 60 to 65 dB L_{dn}. Extending this concept to higher noise levels, an increase in the traffic noise level of 1.5 dB or more may be significant where the pre-project traffic noise level exceeds 65 dB L_{dn}. The rationale for the Table 4.10-6 criteria is that, as ambient noise levels increase, a smaller increase in noise resulting from a project is sufficient to cause annoyance.

Vibration

The City of Sacramento does not have specific policies or standards pertaining to vibration levels. However, vibration levels associated with construction activities and project operations are addressed as potential vibration impacts associated with project implementation. Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events.

Construction operations have the potential to result in varying degrees of temporary ground vibration depending on the specific construction equipment used and operations involved. Table 4.10-7 indicates that pursuant to California Department of Transportation (Caltrans) standards, the threshold for architectural damage to structures is 0.2 in/sec PPV and continuous vibrations of 0.1 in/sec PPV, or greater, would likely cause annoyance to sensitive receptors.

| Table 4.10-7 Effects of Vibration on People and Buildings | | | |
|--|---------------|---|--|
| PPV | | Human Reaction | Effect on Buildings |
| mm/sec | in/sec | | |
| 0.15 - 0.30 | 0.006 - 0.019 | Threshold of perception; possibility of intrusion | Vibrations unlikely to cause damage of any type |
| 2.0 | 0.08 | Vibrations readily perceptible | Recommended upper level of the vibration to which ruins and ancient monuments should be subjected |
| 2.5 | 0.10 | Level at which continuous vibrations begin to annoy people | Virtually no risk of “architectural” damage to normal buildings |
| 5.0 | 0.20 | Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations) | Threshold at which there is a risk of “architectural” damage to normal dwelling - houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize “architectural” damage |
| 10 - 15 | 0.4 - 0.6 | Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges | Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage |

Source: California Department of Transportation, 2002.

Method of Analysis

Below are descriptions of the methodologies used to measure background and ambient noise and estimate future traffic noise, construction noise, and vibration associated with the project. Further modeling details and calculations are provided in Appendix J to this EIR. The results of



the noise and vibration impact analyses were compared to the standards of significance discussed above in order to determine the associated level of impact.

To quantify the existing ambient noise environment in the project vicinity, Saxelby conducted continuous (24-hour) noise level measurements at four locations to the south and east of the project site. Noise measurement locations were taken between March 29th and 31st, 2022 and are shown on Figure 4.10-1. The sound level meters were programmed to record the maximum, median, and average noise levels at each site during the survey. Larson Davis Laboratories (LDL) model 820 integrating sound level meters were used for the ambient noise level measurement survey. The meters were calibrated before and after use with a CAL 200 acoustical calibrator to ensure the accuracy of the measurements. The equipment used meets all pertinent specifications of the American National Standards Institute for Type 1 sound level meters (ANSI S1.4).

To predict existing noise levels due to traffic, Saxelby used the Federal Highway Administration Highway (FHWA) Traffic Noise Prediction Model RD-77-108 (FHWA model). The model is based upon the Calveno reference noise factors for automobiles, medium trucks and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA model was used in conjunction with project-specific traffic volumes provided by DKS Associates to analyze the potential impact of project-generated traffic under Existing Plus Project conditions and future Cumulative Plus Project conditions. Existing Plus Project conditions indicate buildout of the industrial park and nonparticipating parcel components of the proposed project, while Cumulative Plus Project conditions refer to full buildout of the industrial park and nonparticipating parcels in combination with future development in the project area.

The FHWA Roadway Construction Noise Model (RCNM) was used to predict noise levels for standard construction equipment used for roadway improvement projects. The assessment of potential significant noise effects due to construction is based on the standards and procedures described in the Federal Transit Authority (FTA) guidance manual and FHWA's RCNM. The RCNM is a Windows-based noise prediction model that enables the prediction of construction noise levels for a variety of construction equipment based on a compilation of empirical data and the application of acoustical propagation formulas. The RCNM enables the calculation of construction noise levels in more detail than the manual methods, which eliminates the need to collect extensive amounts of project-specific input data. RCNM allows for the modeling of multiple pieces of construction equipment working either independently or simultaneously, the character of noise emission, and the usage factors for each piece of equipment. Noise sources in the RCNM database include actual noise levels and equipment usage percentages.

Saxelby predicted operational noise levels from only the industrial park portion of the project, as well as the full buildout of the project site, including the nonparticipating parcels. To predict noise levels from operational noise, Saxelby used the SoundPLAN noise prediction model to calculate noise levels at the nearest sensitive receptors. Inputs to the model included loading dock noise and on-site vehicle circulation noise associated with the warehouses and the commercial uses. To determine typical noise levels associated with the proposed loading docks, noise level measurement data from a United Natural Foods, Inc. (UNFI) warehouse was used. The noise level measurements were conducted at a distance of 200 feet from the center of the loading dock and circulation area. Activities during the peak hour of loading dock activities were assumed to include truck arrival/departures, truck idling, truck backing, air brake release, and operation of truck-mounted refrigeration units. Noise generation associated with operation of the commercial



component of the proposed project was calculated using trip generation information supplied by DKS Associates.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the baseline and standards of significance identified above. As previously discussed, while the proposed project would require approval of a SOI Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development; however, the following analysis addresses impacts of both the proposed industrial park development and future development of the nonparticipating parcels.

4.10-1 Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Based on the analysis below, the impact is *less than significant*.

Although construction of the industrial park and the nonparticipating parcels would take place at different times, because both periods of construction would occur within the same project site, the following discussion applies to the potential for both project components to result in the generation of a substantial temporary increase in ambient noise levels in excess of applicable standards. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Construction activities associated with the proposed project, including off-site improvements, would require the use of numerous pieces of noise-generating equipment, such as excavating machinery (e.g., backhoes, bulldozers, excavators, front loaders) and other construction equipment (e.g., compactors, scrapers, graders). Construction worker traffic and construction-related material haul trips would raise ambient noise levels along local haul routes, depending on the number of haul trips made and types of vehicles used.

Table 4.10-8 shows maximum noise levels associated with typical construction equipment. However, it is noted that equipment such as concrete saw and jackhammer are primarily used for demolition activities, and, thus, are unlikely to be used during on-site construction of the proposed project. Based on the table, activities involved in typical construction would generate maximum noise levels ranging from 76 to 90 dB at a distance of 50 feet. However, as one increases the distance between equipment, or increases separation of areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of combining separate noise sources. The noise levels from a source decrease at a rate of approximately six dB per every doubling of distance from the noise source. Thus, noise levels at the nearest sensitive noise receptors, including the single-family residences located approximately 200 feet east of the industrial park portion of the project site, and the Paso Verde K-8 School located approximately 200 feet south of the nonparticipating parcels, would conservatively range from 64 to 78 dB. At off-site locations, maximum construction



noise levels associated with development of off-site improvements could be as high as 90 dB.

| Type of Equipment | Maximum Level, dB at 50 feet |
|-------------------|------------------------------|
| Auger Drill Rig | 84 |
| Backhoe | 78 |
| Compactor | 83 |
| Compressor (air) | 78 |
| Concrete Saw | 90 |
| Dozer | 82 |
| Dump Truck | 76 |
| Excavator | 81 |
| Generator | 81 |
| Jackhammer | 89 |
| Pneumatic Tools | 85 |

Source: Federal Highway Administration, Roadway Construction Noise Model User's Guide, January 2006.

The noise increase during construction would be of short duration and would likely occur primarily during daytime hours. The City of Sacramento's Noise Ordinance (Section 8.60.060 of the Municipal Code) exempts construction activities from the City's noise standards, provided that construction takes place between the hours of 7:00 AM and 6:00 PM Monday through Saturday and 9:00 AM and 6:00 PM Sundays and holidays. Although construction activities associated with both components of the proposed project could result in infrequent periods of high noise, the construction noise would not be sustained and would only occur only during the City's permitted construction noise hours. Therefore, a *less-than-significant* impact would occur.

Mitigation Measure(s)
 None required.

4.10-2 Generation of a substantial 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. Based on the analysis below and with implementation of mitigation, the impact is less than significant.

The primary sources of noise associated with the proposed project would be traffic noise associated with traffic on local roadways, as well as operational noise associated with the loading docks and truck circulation, and parking lot circulation. It is noted that while the following analysis of traffic noise addresses buildout of both the industrial park and nonparticipating parcels, operational noise of the industrial park and full buildout of the annexation area are addressed separately. Because the proposed off-site force main, including each of the three potential force main segment options, would be installed underground and would not involve generation of vehicle trips during operation, operation of the force main would not generate a substantial



permanent increase in ambient noise levels in the vicinity of the project in excess of applicable standards established by the City of Sacramento.

Traffic Noise

Using the methodology described in the Method of Analysis section above, traffic noise levels under Existing and Existing Plus Project conditions were estimated as part of the Environmental Noise Assessment and are presented in Table 4.10-9. It is noted that because the data presented in Table 4.10-9 was calculated based on buildout of the industrial park as well as future development of the nonparticipating parcels. As such, the following analysis addresses both components of the proposed project.

Industrial Park and Nonparticipating Parcels

Because Table 4.10-9 presents traffic noise level increases related to full buildout of the project site, traffic noise levels generated by the industrial park portion of the proposed project would be less than what is presented. Traffic noise levels were predicted for the sensitive receptors located at the closest typical setback distance along each project-area roadway segment. Predicted traffic noise levels were then compared to the noise level increase significance criteria presented in Table 4.10-6.

| Table 4.10-9 Project-Related Traffic Noise Level Increases | | | | |
|---|---|---|---------------------------|---------------|
| Roadway | Segment | Predicted Exterior Noise Level at Closest Sensitive Receptors (dBA L_{dn}) | | |
| | | Existing No Project | Existing + Project | Change |
| Metro Air Parkway | I-5 to Pacific Gateway Drive | 42.4 | 45.1 | 2.7 |
| Metro Air Parkway | Pacific Gateway Drive to Meister Way | 43.2 | 45.5 | 2.3 |
| Metro Air Parkway | Meister Way to Elkhorn Boulevard | 43.0 | 45.3 | 2.3 |
| West Elkhorn Boulevard | Lone Tree Road to Baidee Drive | 58.7 | 59.9 | 1.2 |
| Power Line Road | Garden Highway to Del Paso Road | 33.8 | 35.3 | 1.5 |
| Power Line Road | Bayou Road to Del Paso Road | 53.2 | 57.6 | 4.4 |
| Power Line Road | Bayou Way to Pacific Gateway Drive | 56.7 | 57.0 | 0.2 |
| Power Line Road | West Elkhorn Boulevard to Pacific Gateway Drive | 27.7 | 27.9 | 0.1 |
| Del Paso Road | Power Line Road to Hovnanian Drive | 49.7 | 51.6 | 1.9 |

(Continues on next page)



| Table 4.10-9 Project-Related Traffic Noise Level Increases | | | | |
|---|---|---|---------------------------|---------------|
| Roadway | Segment | Predicted Exterior Noise Level at Closest Sensitive Receptors (dBA L_{dn}) | | |
| | | Existing No Project | Existing + Project | Change |
| El Centro Road | Del Paso Road to Hawkview Drive | 47.2 | 48.3 | 1.1 |
| El Centro Road | Hawkview Drive to Bayou Way | 56.5 | 58.5 | 2.0 |
| Garden Highway | Power Line Road to Radio Road | 47.1 | 48.5 | 1.4 |
| Garden Highway | Radio Road to San Juan Road | 52.3 | 53.4 | 1.1 |
| Garden Highway | San Juan Road to City Limit | 50.7 | 50.9 | 0.2 |
| Metro Air Parkway | I-5 to Airport South Industrial Drive | - | 41.4 | - |
| Airport South Industrial Drive | Power Line Road to Metro Air Parkway | - | 44.6 | - |
| Airport South Industrial Drive | Metro Air Parkway to "A" Drive | - | 44.1 | - |
| "A" Drive | Airport South Industrial Drive to Bayou Way | - | 54.1 | - |
| Bayou Way | A Drive to El Centro Road | 58.8 | 61.0 | 2.3 |

Source: Saxelby Acoustics, LLC., 2024.

FICON guidelines specifies criteria to determine the significance of traffic noise impacts, as shown in Table 4.10-6. A traffic noise increase of 5 dB or more is significant if pre-project levels are under 60 dB L_{dn}, or 3 dB or more if existing levels are 60 to 65 dB L_{dn}. For higher levels exceeding 65 dB L_{dn}, a 1.5 dB increase would be considered be significant.

The existing ambient noise level along Power Line Road is 53.4 dBA; thus, the allowable increase in noise levels along the road segment is 5 dB. As shown in Table 4.10-9, above, development of the proposed project would result in a maximum noise level increase of 4.4 dBA L_{dn} along Power Line Road, which is below the maximum allowable increase in noise level. The highest existing ambient noise level in the project vicinity, 62.9 dBA, occurs directly adjacent to Bayou Way. The noise level increase along Bayou Way is predicted to be 1.0 dBA, which is less than the applicable significant increase criterion of 3 dB where noise levels range from 60 to 65 dB L_{dn}. Therefore, the increase in traffic noise levels at existing sensitive receptors due to the proposed project would be considered less than significant.



Operational Noise

As discussed above, the City of Sacramento Municipal Code, Section 8.68.060, establishes an allowable exterior noise level limit for residential uses of 55 dBA L_{50} and 75 dBA L_{max} during daytime (7:00 AM to 10:00 PM) hours and 50 dBA L_{50} and 70 dBA L_{max} during nighttime hours (10:00 PM to 7:00 AM).

Operational noise associated with the proposed project would include noise generated from the loading dock and on-site truck circulation, as well as on-site vehicle circulation associated with the commercial component of the proposed project. Operational noise impacts associated with buildout of the industrial park, as well as noise impacts associated with full buildout of the nonparticipating parcels, are discussed separately below.

Industrial Park

Using the methodology described in the Method of Analysis section, operational noise levels generated by the industrial park portion of proposed project were estimated by Saxelby. It is noted that in estimating operational noise levels of the industrial park, Saxelby assumed that the peak day and peak night levels would be same; as such, Figure 4.10-3 shows the noise level contours for the nighttime (10:00 PM to 7:00 AM) medians (L_{50}). As shown therein, operational noise associated with the industrial park is anticipated to range from 40 to 48 dBA L_{50} , which would comply with the City's noise level standards.

In addition, it should be noted that operational noise associated with the restaurant buildings and fueling station/carwash in the proposed Highway Commercial Planned Unit Development (HC-PUD) zones would not be anticipated to result in substantial increases to the existing ambient noise levels at existing receptors in the project vicinity, given the distance from the Paso Verde K-8 School (nearest receptor) to the closest boundary of a HC-PUD zone (3,500 feet). Furthermore, noise from on-site HC-PUD uses would be shielded by the proposed Parcel 3, Parcel 4, and Parcel 5 warehouse buildings, further attenuating HC-PUD noise at existing sensitive receptors.

Nonparticipating Parcels

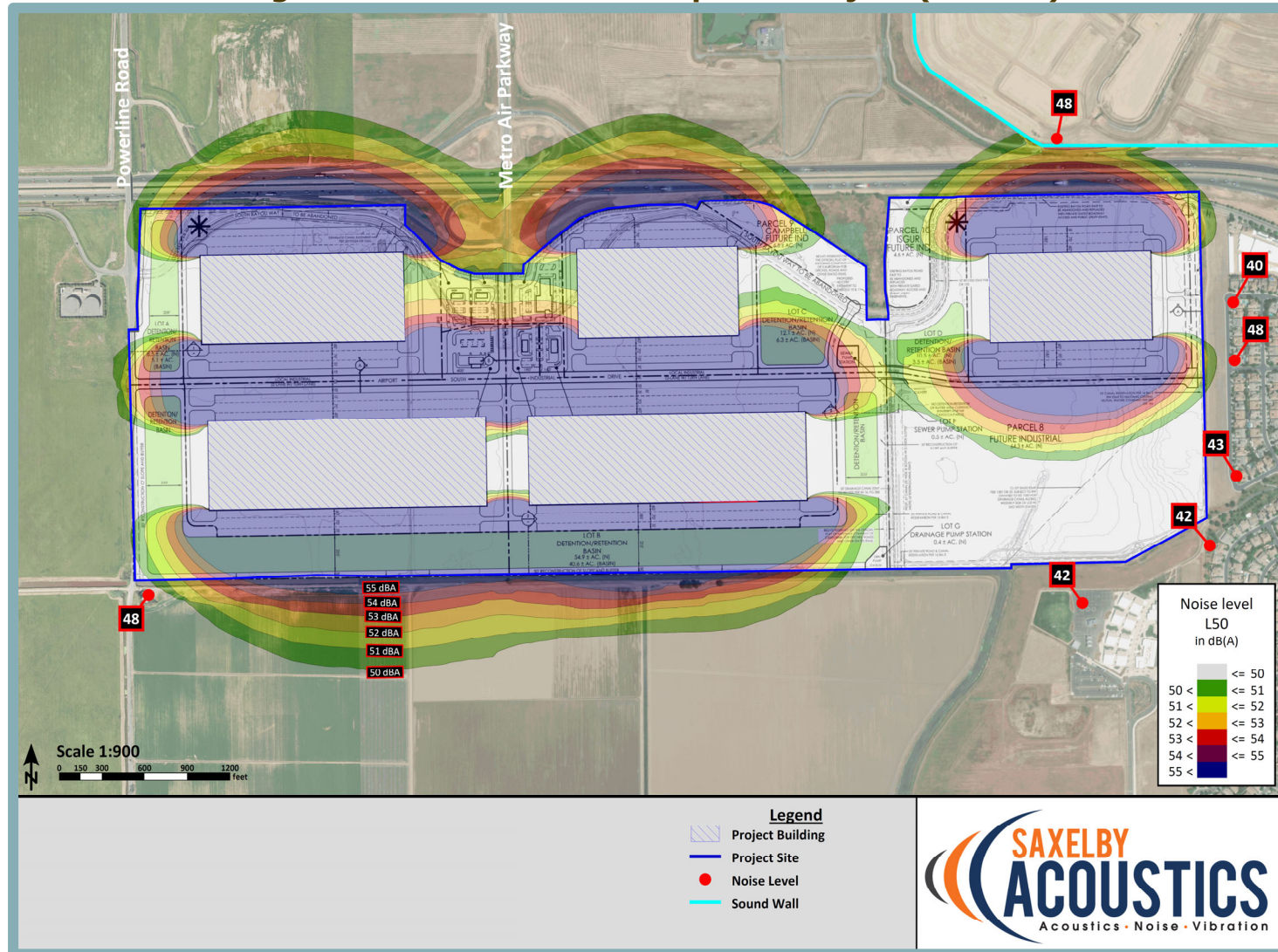
Saxelby also estimated operational noise levels generated by the future development of the nonparticipating parcels to assess operational noise associated with full buildout of the annexation area. The project noise level contours for the daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) medians (L_{50}) are shown in Figure 4.10-4 and Figure 4.10-5, respectively.

As presented therein, peak hour noise levels at the nearest sensitive receptors to the east of the project site, including the contribution of noise generated from on-site operations, would range from 45 to 51 dBA L_{50} .

As shown in Figure 4.10-4, the proposed project, as well as the future development of the nonparticipating parcels, would comply with the City's daytime dBA L_{50} noise level standard.



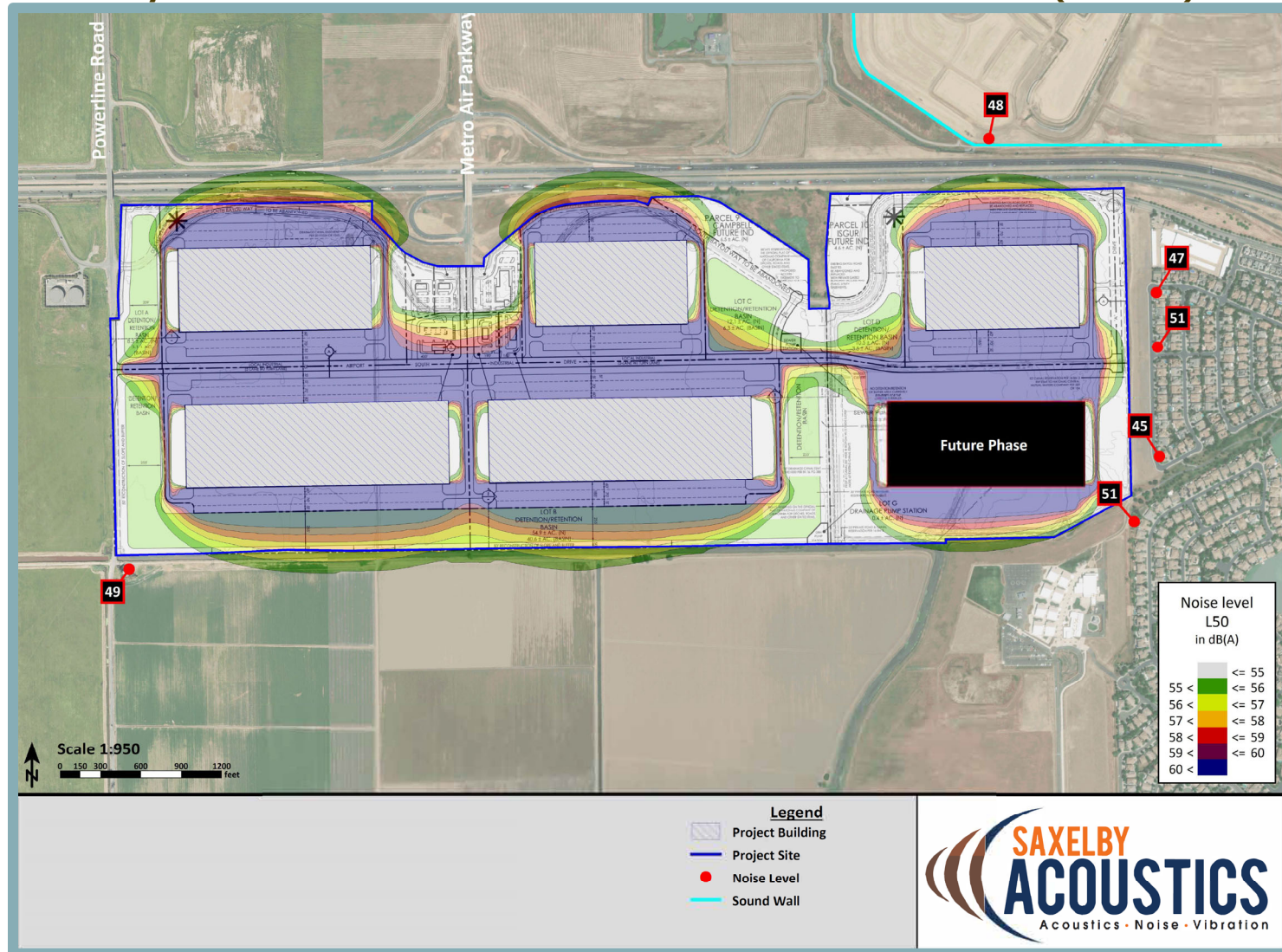
**Figure 4.10-3
 Nighttime Noise Levels – Proposed Project (dBA L₅₀)**



Source: Saxelby Acoustics, LLC., 2024.



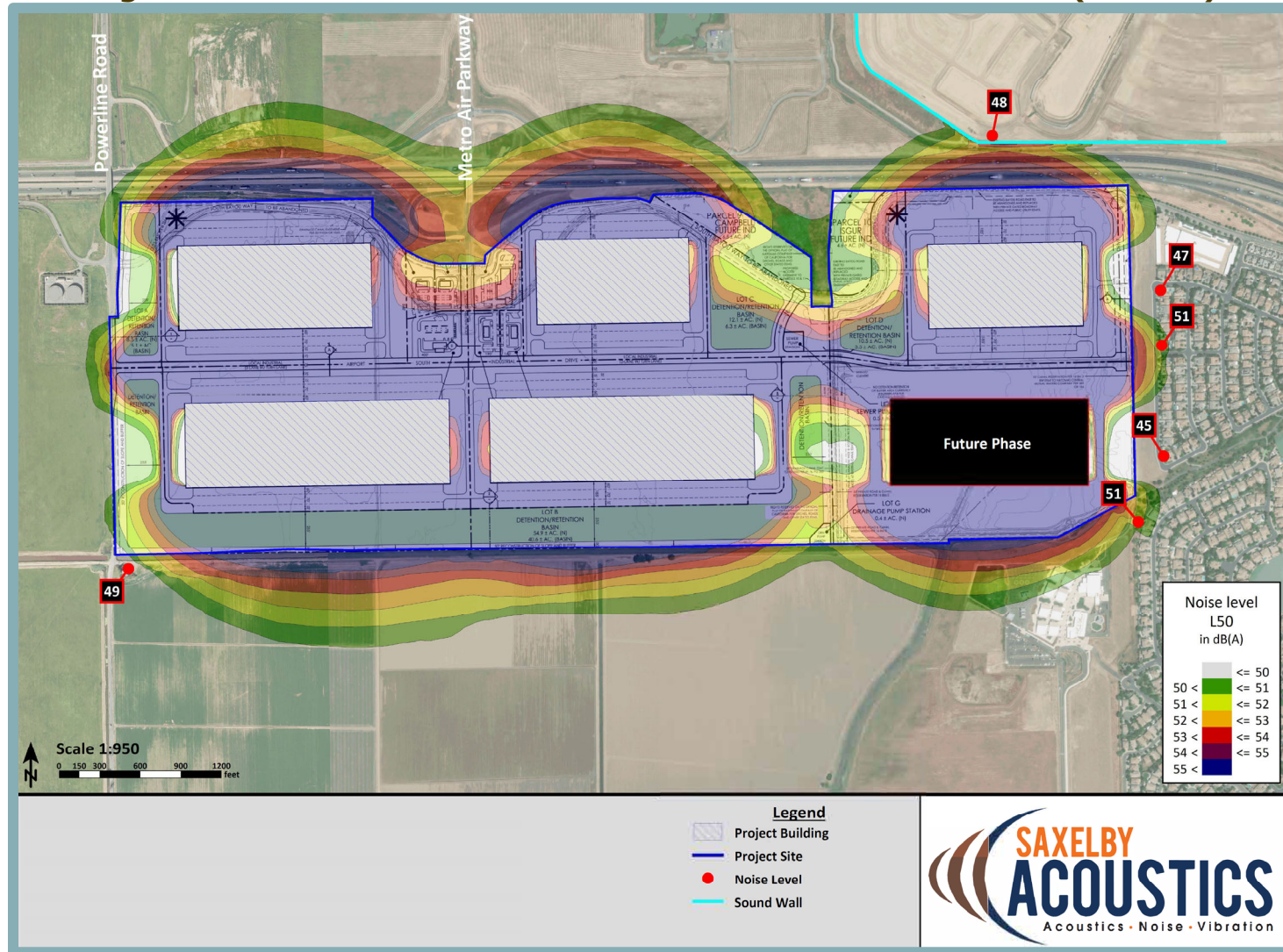
Figure 4.10-4
Daytime Noise Levels – Full Buildout of the Annexation Area (dBA L₅₀)



Source: Saxelby Acoustics, LLC., 2024.



**Figure 4.10-5
 Nighttime Noise Levels – Full Buildout of the Annexation Area (dBA L₅₀)**



Source: Saxelby Acoustics, LLC., 2024



However, as shown in Figure 4.10-5, full buildout of the annexation area would exceed the City's nighttime 50 dBA L₅₀ noise level standard. Therefore, the increase in noise levels at existing sensitive receptors due to on-site operations would be potentially significant.

Conclusion

Based on the above, although the proposed project would not result in an increase in traffic noise levels at existing sensitive receptors that would be considered significant, Saxelby determined that operational noise associated with the proposed project, including the future development of the nonparticipating parcels, could result in noise increases in exceedance of the applicable noise standards. However, as shown in Figure 4.10-6, Saxelby calculated that the inclusion of an eight-foot-tall sound wall along the eastern frontage of the project site would reduce nighttime noise levels at the existing sensitive receptors to between 44 and 48 dBA L₅₀, which is below the City's nighttime 50 dBA L₅₀ noise level standard.

As such, without the inclusion of a sound wall along the project site's eastern frontage, full buildout of the annexation area could result in the generation of a substantial 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, and a **significant** impact could occur.

Mitigation Measure(s)

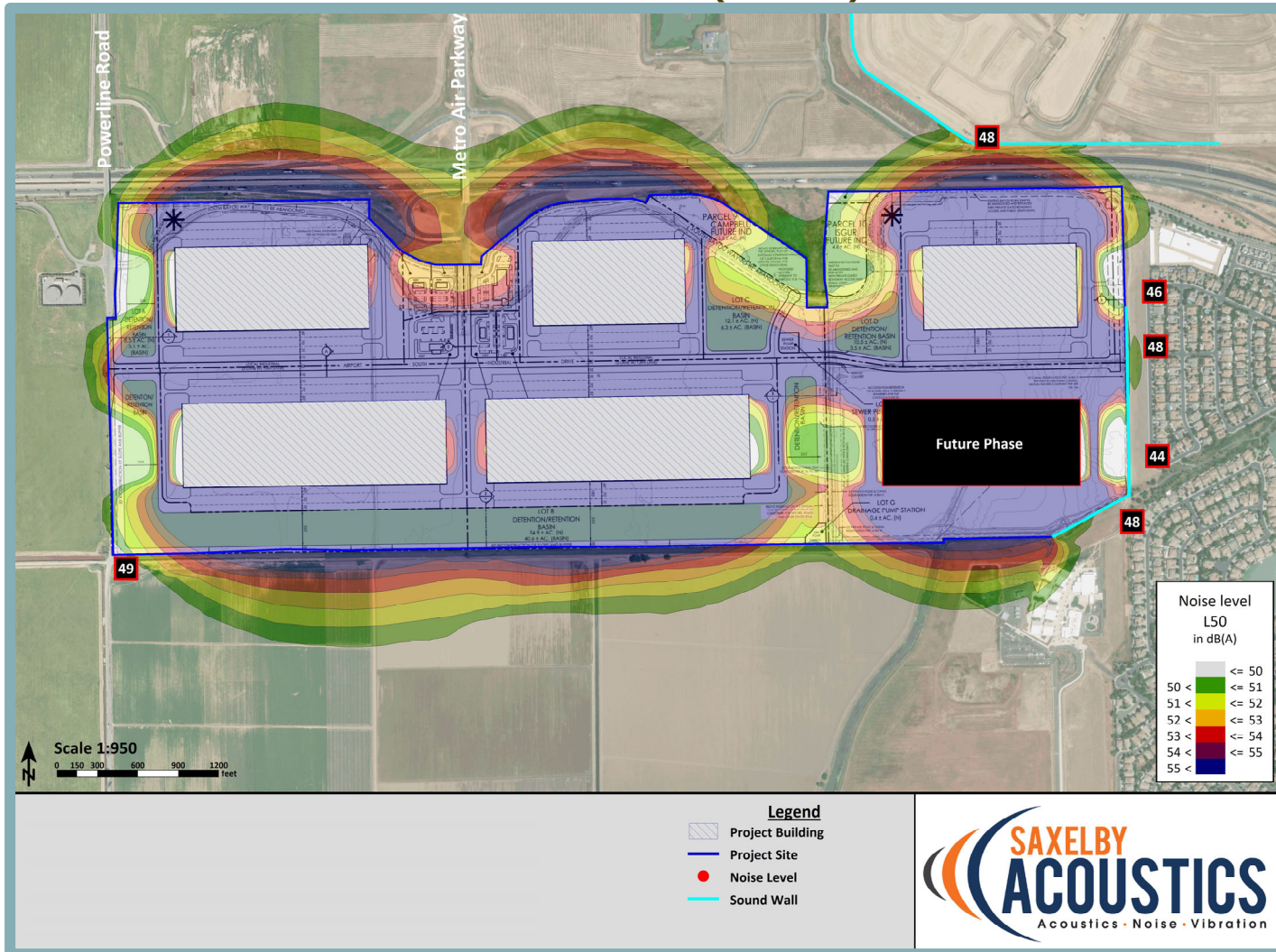
Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

4.10-2 *Prior to approval by the City's Public Works Department of the final Improvement Plans for the nonparticipating parcels portion of the proposed project, the Improvement Plans shall include the following requirements:*

- *An eight-foot-tall sound wall shall be constructed along the eastern project boundary, in the location indicated in Figure 4.10-6 and the Environmental Noise Assessment prepared for the proposed project by Saxelby Acoustics, in order to achieve the City's nighttime 50 dBA L₅₀ noise level standards.*
- *Noise barrier walls shall be constructed of concrete panels, concrete masonry units, earthen berms, or any combination of these materials that achieve the required total height. Wood is not recommended due to eventual warping and degradation of acoustical performance.*



**Figure 4.10-6
 Nighttime Noise Levels with an Eight-Foot Wall – Full Buildout of the
 Annexation Area (dBA L₅₀)**



Source: Saxelby Acoustics, LLC., 2024



4.10-3 Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Based on the analysis below, the impact is less than significant.

According to the Environmental Noise Assessment, operations associated with the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. However, construction activity associated with the proposed project would have the potential to result in varying degrees of temporary ground vibration depending on the specific construction equipment used and operations involved. Accordingly, the analysis below focuses on construction vibration only.

Although construction of the industrial park and the nonparticipating parcels would take place at different times, because both periods of construction would occur within the same project site, the following discussion applies to the potential for both project components to result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Project construction would use typical construction equipment and would not require significant sources of vibration such as pile driving or blasting. Table 4.10-10 below shows the typical vibration levels produced by construction equipment.

| Table 4.10-10 Vibration Levels for Various Construction Equipment | | | |
|--|--------------------------------------|------------------------------------|-------------------------------------|
| Type of Equipment | PPV at 25 feet (in/sec) | PPV at 50 feet (in/sec) | PPV at 100 feet (in/sec) |
| Large Bulldozer | 0.089 | 0.031 | 0.011 |
| Loaded Trucks | 0.076 | 0.027 | 0.010 |
| Small Bulldozer | 0.003 | 0.000 | 0.000 |
| Auger/drill Rigs | 0.089 | 0.031 | 0.011 |
| Jackhammer | 0.035 | 0.012 | 0.004 |
| Vibratory Hammer | 0.070 | 0.025 | 0.009 |
| Vibratory Compactor/roller | 0.210 (Less than 0.20 at 26 feet) | 0.074 | 0.026 |
| <i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006.</i> | | | |

As shown in Table 4.10-10, construction vibration levels associated with development of the proposed project would be less than the 0.20 in/sec PPV threshold for structural damage at distances of 26 feet, and less than the 0.10 in/sec PPV threshold for human annoyance at distances of 50 feet. Sensitive receptors which could be impacted by construction-related vibrations, especially vibratory compactors/rollers, would be located approximately 200 feet, or further, from typical construction activities at the project site. As such, construction activities would not be anticipated to exceed the acceptable levels at such distances.



Conclusion

Based on the construction equipment to be used and the distance from construction activities to the nearest sensitive receptors, vibration from the project would not be a concern. Additionally, construction activities would be temporary in nature. Therefore, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.10-4 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose persons residing or working in the project area to excessive noise levels. Based on the analysis below, the impact is less than significant.

Given that both the industrial park and nonparticipating parcels are located within the same project site, the following discussion applies to impacts related to the project's proximity to the Sacramento International Airport for both components of the proposed project. In addition, the analysis includes evaluation of the proposed off-site improvements. Because the proposed off-site force main would not result in the creation of permanent jobs within two miles of Sacramento International Airport, the force main would not expose persons residing or working in the project area to excessive noise levels associated with the airport.

Industrial Park and Nonparticipating Parcels

The Sacramento International Airport is located approximately 1.6 miles north of the project site. As such, the site is included within the ALUCP. As shown in Figure 4.10-2, the project site is located within the 60 to 70 dBA CNEL airport noise contours. As discussed above and shown in Table 4.10-4, the normally acceptable noise environment for industrial uses is defined as a noise exposure level of less than 75 dBA CNEL. Therefore, noise levels related to the Sacramento International Airport at the project site would be within the City's criteria for the normal acceptable noise environment.

Because the project site is located within the 60 to 70 dBA CNEL airport noise contours, development of the proposed project with industrial uses would not expose people residing or working in the project area to excessive noise levels. Therefore, a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.



Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

For further detail related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections of this EIR.

4.10-5 Generation of a substantial permanent increase in ambient noise levels associated with development of the proposed project in combination with future development. Based on the analysis below, the project’s incremental contribution to this significant cumulative impact is *less than significant*.

Future development projects within the project area, including the industrial park and the future development of the nonparticipating parcels, in combination with future development associated with buildout of the City’s 2040 General Plan, would incrementally affect the future cumulative ambient noise environment. Because the proposed off-site force main, including each of the three potential force main segment options, would be installed underground and would not involve generation of vehicle trips during operation, operation of the force main would not generate a substantial permanent increase in ambient noise levels in combination with future development in the vicinity of the project in excess of applicable standards established by the City of Sacramento.

Industrial Park and Nonparticipating Parcels

Using the methodology described above in the Method of Analysis section, traffic noise levels under Cumulative and Cumulative Plus Project conditions were estimated as part of the Environmental Noise Assessment and are shown in Table 4.10-11. Traffic noise levels were predicted at the sensitive receptors located at the closest typical setback distance along each project-area roadway segment. Predicted traffic noise levels were then compared to the noise level increase significance criteria presented in Table 4.10-6. As shown in Table 4.10-11, the proposed project would not result in an increase in traffic noise levels under Cumulative Plus Project conditions and, as a result, impacts related to cumulative traffic noise would not occur.



| Table 4.10-11 Predicted Cumulative Traffic Noise Level Increases | | | | |
|--|---|---|-----------------------------|---------------|
| Roadway | Segment | Predicted Exterior Noise Level at Closest Sensitive Receptors (dBA L_{dn}) | | |
| | | Cumulative No Project | Cumulative + Project | Change |
| Metro Air Parkway | I-5 to Pacific Gateway Drive | 46.2 | 47.3 | 1.1 |
| Metro Air Parkway | Pacific Gateway Drive to Meister Way | 46.1 | 47.2 | 1.0 |
| Metro Air Parkway | Meister Way to Elkhorn Boulevard | 45.4 | 45.8 | 0.5 |
| West Elkhorn Boulevard | Lone Tree Road to Baidee Drive | 62.9 | 63.0 | 0.1 |
| Power Line Road | Garden Highway to Del Paso Road | 39.9 | 40.6 | 0.7 |
| Power Line Road | Bayou Way to Del Paso Road | 57.1 | 60.1 | 3.0 |
| Power Line Road | Bayou Road to Pacific Gateway Drive | 57.5 | 58.5 | 1.0 |
| Power Line Road | West Elkhorn Boulevard to Pacific Gateway Drive | 28.7 | 29.8 | 1.0 |
| Del Paso Road | Power Line Road to Hovnanian Drive | 50.0 | 51.4 | 1.3 |
| El Centro Road | Del Paso Road to Hawkview Drive | 52.7 | 52.3 | -0.4 |
| El Centro Road | Hawkview Drive to Bayou Way | 62.7 | 61.9 | -0.9 |
| Garden Highway | Power Line Road to Radio Road | 53.3 | 54.0 | 0.6 |
| Garden Highway | Radio Road to San Juan Road | 58.8 | 59.2 | 0.4 |
| Garden Highway | San Juan Road to City Limit | 55.7 | 56.0 | 0.3 |
| Metro Air Parkway | I-5 to Airport South Industrial Drive | - | 43.0 | - |
| Airport South Industrial Drive | Power Line Road to Metro Air Parkway | - | 46.4 | - |
| Airport South Industrial Drive | Metro Air Parkway to "A" Drive | - | 45.9 | - |

(Continues on next page)



| Table 4.10-11 Predicted Cumulative Traffic Noise Level Increases | | | | |
|--|---|---|-----------------------------|---------------|
| Roadway | Segment | Predicted Exterior Noise Level at Closest Sensitive Receptors (dBA L_{dn}) | | |
| | | Cumulative No Project | Cumulative + Project | Change |
| "A" Drive | Airport South Industrial Drive to Bayou Way | - | 56.4 | - |
| Bayou Way | A Drive to El Centro Road | 62.9 | 63.8 | 1.0 |

Source: Saxelby Acoustics, LLC., 2024.

Planned and future development within the City’s 2040 General Plan policy area or areas within Sacramento County in the project vicinity include the Greenbriar Development Project, the Metro Air Park Project, and the Elkhorn Boulevard Extension Project. Such development would contribute to the cumulative noise environment during the Cumulative Plus Project Conditions. However, traffic noise generated by the future developments in the project vicinity have been included in the cumulative noise analysis presented herein. In addition, the potential future developments are not expected to generate substantial noise levels during operations beyond what has been anticipated for full buildout of the project site, as presented above.

Based on the above, the proposed project would not result in a substantial 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 project’s incremental contribution to cumulative noise impacts would be **less than significant**.

Mitigation Measure(s)

None required.



4.11 PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

4.11 PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

4.11.1 INTRODUCTION

The Public Services, Utilities, and Service Systems chapter of the EIR summarizes the setting information and identifies potential new demands resulting from the proposed project on public services and utilities, including fire protection and law enforcement services, schools, parks, and recreation facilities, as well as water, sanitary sewer, electric power, natural gas, telecommunication, and solid waste disposal services. The chapter evaluates the sufficiency of water supplies to meet the project's water demand and assesses the adequacy of the wastewater treatment system required to serve the project. Pursuant to Section XV of CEQA Guidelines Appendix G, potential impacts to public services are identified if the proposed project would require the development of new facilities or expansion of existing facilities, the construction of which could have adverse physical effects on the environment. Information for the Public Services, Utilities, and Service Systems chapter was primarily drawn from the Targeted Municipal Services Review (Targeted MSR) (see Appendix K of this EIR),¹ the Airport South Industrial Preliminary Water Study (Preliminary Water Study) (see Appendix L of this EIR),² and the Airport South Industrial Level 1 Sewer Study (Sewer Study) (see Appendix M of this EIR),³ all of which were prepared for the proposed project by Wood Rodgers. In addition, information was sourced from the City of Sacramento 2040 General Plan,⁴ the City of Sacramento 2040 Master EIR (MEIR),⁵ and the City of Sacramento 2020 Urban Water Management Plan (UWMP).⁶

Impacts related to groundwater and storm drainage facilities are addressed in Chapter 4.8, Hydrology and Water Quality, of this EIR. In addition, as discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way. As such, the project would also require Annexation into the SacSewer service area.

4.11.2 EXISTING ENVIRONMENTAL SETTING

The following section describes the existing public services in the City of Sacramento, including fire protection and law enforcement services, schools, parks, and recreation facilities, as well as

¹ Wood Rodgers. *Airport South Industrial Targeted Municipal Services Review*, Sacramento, Local Agency Formation Commission. January 2024.

² Wood Rodgers. *Airport South Industrial Preliminary Water Study*, City of Sacramento, California. May 11, 2023.

³ Wood Rodgers. *Airport South Industrial Level 1 Sewer Study*. November 2022.

⁴ City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

⁵ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.

⁶ City of Sacramento. *City of Sacramento 2020 Urban Water Management Plan*. June 2021.



the existing utilities and service systems in the project area, including water supply, wastewater conveyance and treatment, solid waste, and gas, electric, and telecommunication infrastructure.

Fire Protection Services

The project site is currently provided fire protection services by the Natomas Fire Protection District (per contract with Sacramento Fire Department [SFD] for services). The SFD's service area consists of approximately 99.2 square miles within the City limits and 47.1 square miles in Sacramento County, including two contract areas for the Pacific Fruitridge Fire Protection District and Natomas Fire Protection District. The department is a full-service fire department, with the responsibility for responding to and mitigating incidents involving fires, medical emergencies, hazardous material incidents, and water rescue within its service area.

The SFD also provides a full range of support services, including fire prevention, public education, fire investigation, and domestic preparedness planning and response. The department participates in an automatic aid agreement with neighboring fire jurisdictions, as well as State and federal agencies. According to the City's currently approved budget, the SFD has approximately 761 budgeted personnel positions that respond to approximately 109,342 calls and provide service to approximately 518,161 residents and more than 20,000 businesses in the City.⁷ At full staffing levels, the SFD daily operation staff consists of a total of 177 on-duty personnel for fire and emergency medical service (EMS) first responder emergencies. The SFD maintains a goal to have its first responding company, which provides for fire suppression and paramedic services, arrive within four minutes.

The SFD is organized into the following divisions:

- Fire Administrative Services, which is responsible for departmental support of budget, revenues, accounts payable, procurement, contracts, council reports and grants, and various personnel services;
- Fire/Emergency Medical Services, which responds to fires, rescues, hazardous materials incidents, wildland fires, and other emergencies and medical services;
- Office of the Chief, which is responsible for developing and providing the department's overall direction;
- Technical Services, which provides essential support functions to all divisions, including equipment acquisition and repair, information technology, facility maintenance and repair coordination, and fleet maintenance. The division also enforces fire codes and ordinances, conducts plan reviews and construction inspections, and investigates fires;
- Training/Professional Standards, which is responsible for essential fire recruit training including in-service, continuing education, and outreach/recruitment.

The SFD is headquartered at the City's Public Safety Center, located at 5770 Freeport Boulevard in Sacramento. The facility also serves as the Sacramento Police Department's (SPD) headquarters. The SFD operates 24 fire stations, which are strategically located throughout the City. The nearest SFD station to the project site is Station 43, which is located at 4201 El Centro Road, approximately 2.5 miles southeast of the site. Although each SFD station operates within a specific response district encompassing the immediate geographical area around the station, all of the fire agencies within Sacramento County (i.e., SFD, Sacramento Metropolitan Fire District, Sac Airport Fire, Cosumnes Community Services District Fire Department, and the

⁷ City of Sacramento. *Approved Budget Fiscal Year 2023/24*. July 1, 2023.



Folsom Fire Department) share an automatic aid agreement that allows response from the closest fire unit regardless of jurisdiction. The nearest existing fire station in Sacramento County to the project site is the Sac Airport Fire station, located at the Sacramento International Airport, approximately 2.1 miles to the north of the project site.

All but one of the SFD engine companies are staffed with four personnel, consisting of a Company Officer (captain), engineer, and two firefighters. The remaining engine company, located at Station 3 in the rural portion of the contracted Natomas Fire Protection District, is staffed with three personnel (a captain, an engineer, and a firefighter). In addition, SFD truck companies and the department's lone rescue company are also staffed with personnel that are identical to the four-person engine companies. Ambulances are staffed with two firefighters/paramedics or a firefighter/paramedic and firefighter/emergency medical technician (EMT) combination.

Metro Air Park, a master planned industrial development, is also scheduled to provide land and facilities for a new fire station near the project site. The 10,000-square-foot (sf) fire station will be located approximately 1.4 miles north of the site and operated by the Sacramento Metropolitan Fire District. Construction of the facility is planned at such time that Metro Air Park reaches 30 percent buildout.

Law Enforcement Services

The project site is currently located within the unincorporated portion of Sacramento County, which is provided law enforcement services by the Sacramento County Sheriff's Office. Upon annexation into the City of Sacramento, the site would be served by the SPD. The SPD provides law enforcement services within the City limits and is staffed with approximately 1,132 employees, including 619 police officers, 25 police lieutenants, and various professional and non-career staff.⁸ The SPD is managed by the Chief of Police, as well as three Deputy Chiefs and a captain who oversee the Offices of Operations, Investigations, and Specialized Services.

As discussed previously, the SPD is headquartered at the City's Public Safety Center at 5770 Freeport Boulevard and is supported by several substations throughout the City. The substations include the William J. Kinney Police Facility, which serves the SPD's North Area from 3550 Marysville Boulevard; the Joseph E. Rooney Police Facility, which serves the SPD's South Area from 5303 Franklin Boulevard; and the Central Command Richards Police Facility, which is located at 300 Richards Boulevard.

The North Area substation provides police services to the northern portion of the City, from the American River to the south, to the City limits to the west, north, and east. The South Area substation provides police protection services to the southern portion of the City, from U.S. Route 50 (US-50) to the north, to the City limits to the west, south, and east. The Central Command Richards Police Facility provides police response to three main beats in the central portion of the City, which are bounded by the American River to the north, US-50 to the south, the Sacramento River to the west, and the City limits to the east. The nearest police substation to the project site is the Central Command Richards Police Facility, which is located approximately 5.4 miles to the southeast of the site.

The SPD does not have an adopted officer-to-resident ratio. The department uses geographic information systems (GIS) data, call and crime frequency information, and available personnel to

⁸ City of Sacramento. *Approved Budget Fiscal Year 2023/24*. July 1, 2023.



rebalance its deployment on an annual basis in order to meet the changing demands of the City. The SPD maintains an unofficial goal of 2.0 to 2.5 sworn police officers per 1,000 residents and one civilian support staff per two sworn officers.

Schools

The project site is within the Natomas Unified School District (NUSD), which is located in the northwestern portion of the City of Sacramento and Sacramento County and encompasses 36.78 square miles. The NUSD is bounded by the Sacramento River to the south and west and the American River to the south, and bisected by I-5 and Interstate 80 (I-80). The 15 schools/programs within the NUSD include the following:

- Early Learning Program (Preschool, Transitional Kindergarten [TK], and K) at various NUSD facilities;
- American Lakes School (TK-8) at 2800 Stonecreek Drive;
- Bannon Creek School (K-8) at 2775 Millcreek Drive;
- H. Allen Hight Elementary (TK-5) at 3200 North Park Drive;
- Heredia-Arriaga Dual Immersion School (TK-K) at 1800 Club Center Drive;
- Heron School (TK-8), Jefferson School (TK-8) at 5151 Banfield Drive;
- Jefferson School (TK-8) at 2001 Pebblewood Drive;
- Natomas Park Elementary (TK-5) at 4700 Crest Drive;
- Paso Verde K-8 School (TK-8) at 5240 PV Scholars Lane;
- Two Rivers Elementary (TK-5) at 3201 West River Drive;
- Witter Ranch Elementary (TK-5) at 3790 Poppy Hill Way;
- Natomas Middle School at 3200 North Park Drive;
- Discovery High School at 3401 Fong Ranch Road;
- Inderkum High School at 2500 New Market Drive; and
- Natomas High School at 3301 Fong Ranch Road.

Of the aforementioned schools, the nearest NUSD facility to the project site is Paso Verde K-8 School, which is located immediately south of the southeast corner of the annexation area. In addition, the following charter schools are located within the NUSD: Leroy Greene Academy, NP3 Charter Elementary School, NP3 Charter Middle School, NP3 Charter High School, Natomas Charter School, and Westlake Charter School.

Including charter schools, the current NUSD enrollment is 16,598, and the current capacity is 18,344 students.⁹ The NUSD 2017 Master Plan Update provides updates on the major facilities constructed within the school district since 2015, when a 2008 moratorium on new construction within Natomas Basin was lifted, and details the future development projects the NUSD has determined necessary to accommodate students within the school district through 2032. The 2017 Master Plan Update identifies two undeveloped sites in the City of Sacramento (Northpointe on Club Center Drive and 88 Acres on El Centro Road), which are planned for future NUSD school facilities.¹⁰ In addition, Measure L, a \$172 million school facilities bond to serve NUSD schools, was approved by voters in November 2018. Funds from Measure L serve to upgrade existing facilities and construct new facilities identified by the NUSD in the 2017 Master Plan Update.

⁹ Mellor, Jennifer, Facilities & Strategic Planning Director. Personal Communication [email] with Joseph Baucum, Senior Associate, Raney Planning & Management, Inc. June 29, 2023.

¹⁰ Natomas Unified School District. *2017 Master Plan Update*. December 13, 2017.



The NUSD administers development impact fees on new construction within the district, which fund the cost of improving and expanding school facilities and equipment needed to accommodate additional student population induced by new development. Currently, the NUSD development impact fee rate is \$4.79 per sf of new residential development, and \$0.78 per sf of new commercial/industrial development.

Parks and Recreation Facilities

The City of Sacramento maintains a network of parks, open spaces, and recreation areas that contribute to the identity and character of the City's neighborhoods and urban areas. Park and tree maintenance is managed by the City's Youth, Parks, and Community Enrichment (YPCE) Department, which also directs future park design and planning, administrative services, marketing, recreation and human services, and special events.

Approximately 4,360 acres of parks, parkways, open space, community centers, aquatic facilities, and bike trails are accessible to Sacramento residents at more than 235 park sites; 21 lakes, ponds, and beaches; 16 aquatic facilities; 18 community centers; and over 70 miles of shared-use paths, including extensive river parkways along the Sacramento and American rivers. Parks in Sacramento range in size between 0.1-acre and 625 acres and are interwoven with urban areas and neighborhoods. Park types within the City of Sacramento include the following:

- **Neighborhood Parks:** The City's neighborhood parks range in size between two and 10 acres and each serve a 0.5-mile radius. Some facilities are located adjacent to elementary schools where park programming can be oriented to the recreational needs of children. Other neighborhood-serving park types include urban plazas and pocket parks, which are strictly less than five acres in size and typically placed in the urban core.
- **Community Parks:** Community parks are generally six to 60 acres in size and provide a broader range of amenities for several neighborhoods within a three-mile radius. In addition to the types of amenities provided at neighborhood parks, community parks are sized to provide additional amenities such as restrooms, on-site parking, community centers, swimming pools, lighted sports fields or courts, and/or other specialized facilities.
- **Citywide/Regional Parks:** Citywide/regional parks are generally 75 to 200 acres in size and are intended to serve the City. Citywide/regional parks typically incorporate amenities that are not found in smaller neighborhood or community parks and may include facilities such as golf courses, aquatic centers, marinas, amusement areas, nature areas, and/or shared-use trails. Parkway are also included in the classification and typically consist of linear, narrow corridors with limited recreational uses that are primarily used for pedestrian/bicycle linkages between residential neighborhoods, schools, parks, and shopping areas.
- **Open Space and Shared-Use Paths:** The City's open space and shared-use paths are for natural areas within the City that are used to protect environmental amenities, such as native plant communities or wildlife habitat. Open space areas generally have limited recreational use. While classified separately, parkways are similar to the open space classification, due to their limited recreational use and design.

The nearest park to the project site is Egret Park, which is located immediately to the east of the site within the Westlake Subdivision community (see Figure 3-2 of the Project Description chapter). An open space buffer area extends northwest of Egret Park for potential expansion of Egret Park. In accordance with Sacramento City Code Section 18.56.230, new development within the City is required to pay a Park Development Impact Fee prior to issuance of a building



permit. According to the City of Sacramento's Fees and Charges database, the Park Development Impact Fee is currently assessed at a total rate of \$0.22 per square-foot (sf) for new industrial development not in the Central City or a Housing Incentive Zone, which includes a \$0.17 per sf rate for Neighborhood/Community fees and a \$0.05 per sf rate for Citywide fees.¹¹ As shown in Figure 1.4 of the City of Sacramento Park Impact Fee Nexus Study Update, the project site is not located in the Central City or a Housing Incentive Zone.¹² Revenues generated through the Park Development Impact Fee pay for park facilities, including the design, construction, installation, improvement, and acquisition of park facilities for neighborhood parks within two miles of a project site, community parks within five miles of a site, and regional and citywide park facilities located anywhere in the City.

In addition, the City of Sacramento Parks and Recreation Master Plan 2005-2010, which establishes policies to guide decision-making by City staff and officials related to park facilities, identifies growth opportunity areas, the closest of which to the project site is the City-approved Northlake (Greenbriar) subdivision, to the north of the site, across I-5. The Parks and Recreation Master Plan does not identify parks and recreation growth opportunity areas within the project site, as the site is currently within the unincorporated portion of Sacramento County. The nearest park facility within the unincorporated County to the project site is the Teal Bend Golf Club, located 2.4 miles to the northwest of the project site.

Other Public Facilities

The Sacramento Public Library (SPL) serves the cities of Sacramento, Citrus Heights, Elk Grove, Galt, Isleton, Rancho Cordova, and the County of Sacramento. The SPL authority is governed by a Joint Exercise of Powers Agreement between the cities and County to provide public library services to all citizens in the combined jurisdiction. Currently, SPL operates a total of 27 branches, including 11 branches within the City of Sacramento and 16 branches in other cities and throughout Sacramento County.¹³ SPL also operates a bookmobile. Residents of Sacramento County have access to all library branches both inside and outside the City of Sacramento. In addition, 16 new libraries are planned for construction in the City and County of Sacramento by 2025. Based on plans set forth in the SPL Authority Facility Master Plan, the SPL expects to provide 1,007,274 sf of library space throughout the SPL's service area by 2025. The North Natomas Public Library is the closest SPL branch to the project site and is located approximately 2.5 miles to the east of the site at 4660 Via Ingoglia Street.

Water Supply and Delivery Infrastructure

The project site is not currently provided potable water service, as the site does not contain structures necessitating water demand and has only limited utility infrastructure. Upon annexation into the City as part of the proposed project, the City would be responsible for providing water to the project site. According to the Targeted MSR and as detailed in the City's 2020 UWMP, the City of Sacramento is both a water retailer and a water wholesaler and maintains facilities that produce, treat, store, and deliver drinking water to customers. The City's retail water service area is approximately 101 square miles and serves customers predominantly located within the City limits and foreseeable future City expansions. The City also serves a small number of customers outside its boundaries in an adjacent, unincorporated portion of Sacramento County. Additionally,

¹¹ City of Sacramento. *Fees and Charges*. Available at: <https://www.cityofsacramento.gov/finance/fees-and-charges>. Accessed April 2024.

¹² City of Sacramento. *City of Sacramento Park Impact Fee Nexus Study Update*. October 12, 2016.

¹³ Sacramento Public Library. *Locations*. Available at: <https://www.saclibrary.org/Locations>. Accessed February 2024.



the City provides wholesale water service to other agencies from its entitlements, including the Sacramento County Water Agency (SCWA) (which includes the Sacramento International Airport and SCWA Zone 40), Sacramento Suburban Water District, and California American Water.

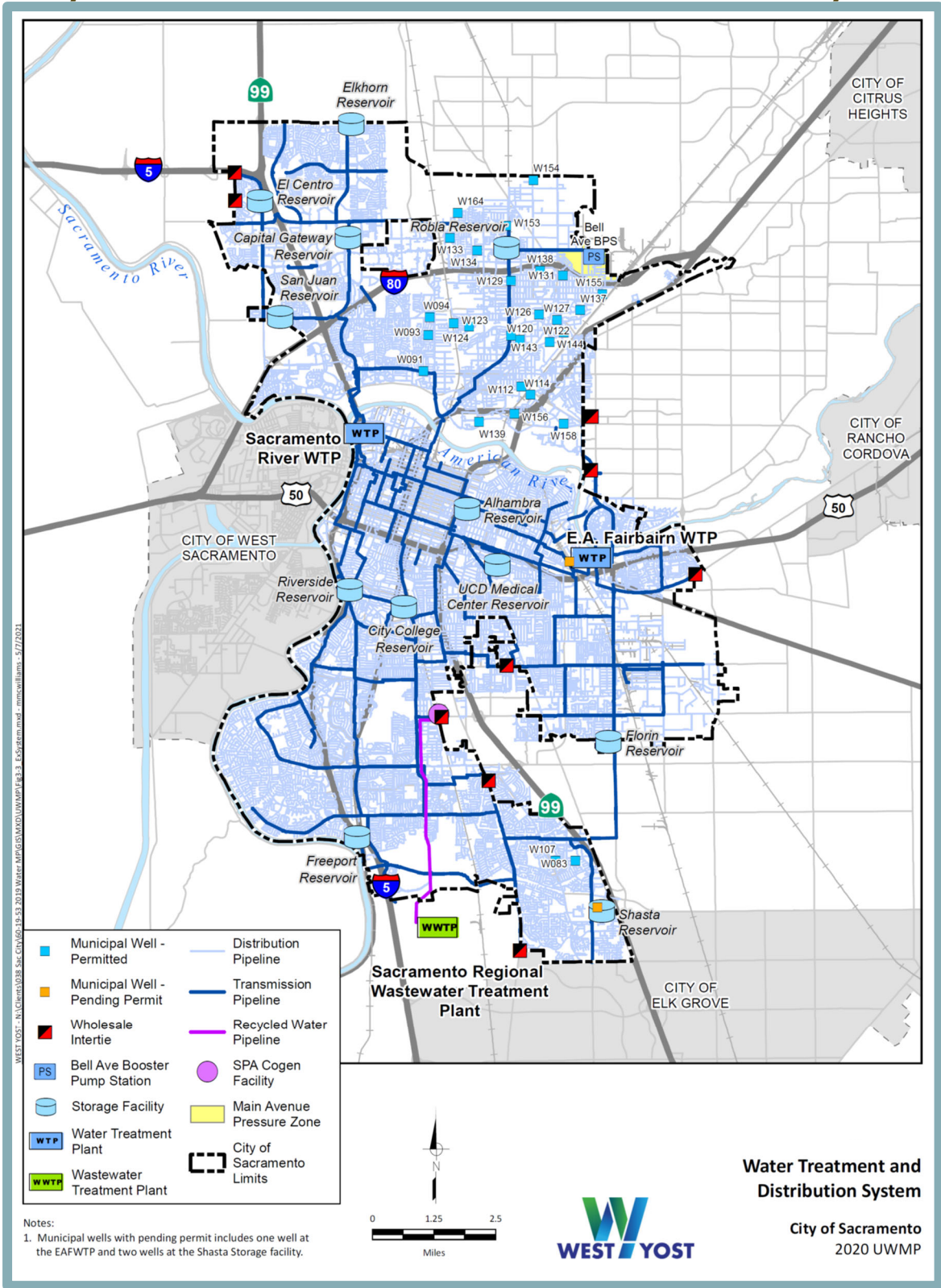
The City's water infrastructure network consists of two surface water treatment facilities, two pressure zones, and a supporting system of groundwater wells, pumping facilities, storage tanks, and distribution/transmission pipelines (see Figure 4.11-1). The City treats surface water diversions at the Sacramento River Water Treatment Plant and the E.A. Fairbairn Water Treatment Plant. Pursuant to the City's 2020 UWMP, the Sacramento River Water Treatment Plant treats Sacramento River water and has a maximum processing capacity of 160 million gallons per day (mgd). The City is permitted to operate the Sacramento River Water Treatment Plant at 160 mgd in the summer months and 120 mgd in the shoulder months (April, May, October, and September); however, treatment capacity may be lowered to 135 mgd in the summer months, if certain low-river levels occur. The City is currently evaluating the potential of further expanding the Sacramento River Water Treatment Plant to increase the plant's diversion and treatment capacity to 310 mgd. According to the City's 2020 UWMP, the E.A. Fairbairn Water Treatment Plant treats American River water and is currently rated for a diversion capacity of 200 mgd, with a permitted treatment capacity of 160 mgd. The E.A. Fairbairn Water Treatment Plant was designed to be expanded in stages to an ultimate treatment capacity of 404 mgd. However, due to several factors, the E.A. Fairbairn Water Treatment Plant's current reliable capacity during peak demand periods is 80 mgd, with the ability to operate at up to 100 mgd for short time periods. High-service pumps at each treatment plant pump water into the distribution system to create a pressure zone that serves most of the City. In addition, a second pressure zone occurs in the northeast portion of the City. On average the City maintains approximately 45 pounds per square inch (psi) throughout its system with a minimum pressure threshold of 30 psi.

In regard to groundwater wells, the City overlies two subbasins of the Sacramento Valley Groundwater Basin (the North American Subbasin, located north of the American River, and South American Subbasin, located south of the American River). The North American Subbasin is bounded by Bear River to the north, Feather River to the west, the Sacramento and American rivers to the south, and a north-to-south line extending from Bear River to Folsom Lake to the east. The South American Subbasin is bounded by the Sierra Nevada Mountain range to the east, the Sacramento River to the west, the American River to the north, and the Cosumnes and Mokelumne rivers to the south. The City currently operates and maintains 26 permitted groundwater wells that draw from the North American Subbasin and two permitted wells in the South American Subbasin. Of the total, 23 are operated regularly to supply municipal water. Additionally, the City operates 22 irrigation/park supply wells. The total maximum pumping capacity of all wells is approximately 23 mgd; however, factoring in a reduced availability of well production, the typically available total pumping capacity is approximately 14 to 20 mgd.

The City operates and maintains 17 water storage facilities, including 12 reservoirs located throughout the City and five finished water clear wells located at each water treatment plant. The system's total reservoir storage capacity is 49 million gallons and the total clear-well capacity is approximately 45 million gallons.



**Figure 4.11-1
 City of Sacramento Water Treatment and Distribution System**



Finally, the City maintains approximately 1,800 miles of transmission and distribution system mains throughout the City, ranging in size between two and 72 inches in diameter. Approximately 415 miles of pipelines exceed 12 inches in diameter, while approximately 70 percent of the systems consists of six- and eight-inch diameter pipelines. The City has one dedicated pipeline that conveys recycled water from the Sacramento Regional Wastewater Treatment Plant to the Sacramento Power Authority Cogeneration Facility.

Within the project vicinity, the City of Sacramento operates and maintains a 30-inch water transmission main in Bayou Way that terminates near the eastern boundary of the project site (see Figure 4.11-2). The transmission main was originally constructed to “wheel” the City’s water through the County of Sacramento to nearby development areas, including the Sacramento International Airport and Metro Air Park, both located north of the project site, across I-5. Wheeling service refers to when the City diverts, treats, and conveys water to another agency using that agency’s water supply entitlements.

Existing on-site water infrastructure includes a 16-inch to 24-inch transmission main and a parallel 12-inch redundant main in Bayou Way, which are operated and maintained by Sacramento County. The aforementioned facilities extend westward into the site from a City/County metering station, which is located immediately east of the project site. In addition, from the City’s existing 30-inch transmission main, a 30-inch SCWA Zone 50 transmission main extends westward into the site. The County’s system ties to other transmission mains that serve Metro Air Park and the Sacramento International Airport and includes two, 1.4-million-gallon water tanks that are located immediately west of the project site, near the southwest intersection of I-5 and Power Line Road.

Water Supply and Demand

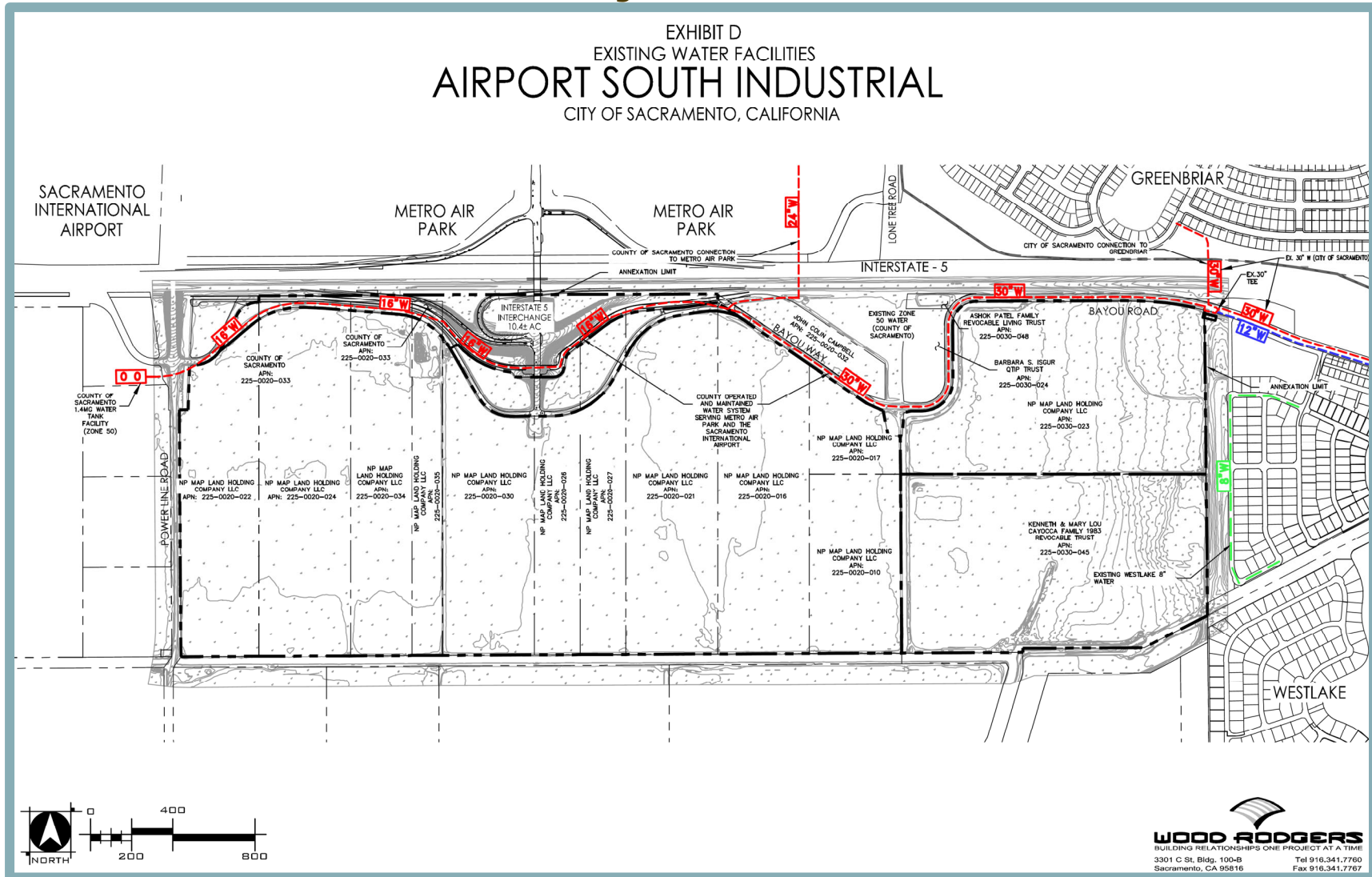
According to the City’s 2020 UWMP, the City has relied on river water for its primary source of supply since 1854. The City has multiple surface water entitlements, consisting of five appropriative water right permits issued by the State Water Resources Control Board (SWRCB), pre-1914 rights, and a water rights settlement contract with the U.S. Bureau of Reclamation (USBR). The five appropriative water right permits are comprised of one permit for the diversion of Sacramento River water and four permits for the diversion of American River water. Diverted water is treated at the Sacramento River Water Treatment Plant and the E.A. Fairbairn Water Treatment Plant, prior to distribution to customers through the City’s network of water pipelines, tanks, and pumping facilities.

The City has both pre-1914 and post-1914 appropriative rights for water from the Sacramento River. The City has used Sacramento River water since 1854 and claims a pre-1914 appropriative right to divert 75 cubic feet per second (cfs) from the Sacramento River. The City also has one post-1914 Sacramento River permit (Permit 992). Permit 922 has a priority date of March 30, 1920 and authorizes the City to take water from the Sacramento River by direct diversion. Under Permit 992, the City may divert up to 81,800 acre-feet per year (AFY) with a maximum flow of 225 cfs. Water diverted from the Sacramento River under Permit 992 may be used within the City limits and, as the boundaries of the City limits changes from time to time, through annexations.

American River Permits 11358 and 11361 have priority dates of October 29, 1947, and September 22, 1954, respectively. The permits authorize the City to divert water from the American River by direct diversion, with a combined maximum diversion of 245,000 AFY in 2030 at an allowable rate of diversion of 675 cfs. The City’s other two American River permits (Permits 11359 and 11360) have priority dates of February 13, 1948 and July 29, 1948, respectively.



**Figure 4.11-2
 Existing Water Facilities**



The latter two permits authorize re-diversion for consumptive uses of American River tributary water previously diverted by the Sacramento Municipal Utility District (SMUD) Upper American River Project (UARP). The combined maximum allowable diversion under the two permits includes re-diversion of up to 1,510 cfs of UARP direct diversion water and up to 589,000 AFY of UARP stored water. The Place of Use for these two permits is 96,000 acres within and adjacent to the City.

With respect to the City’s 1957 water rights Settlement Contract with the USBR, the City agreed to limitations on the City’s rate and amount of diversion under its existing water rights permits in exchange for the USBR’s agreement to operate USBR facilities in a manner that assures the City has a permanent reliable supply of surface water under the City’s permits. The City agreed to limit its total combined diversions of the Sacramento and American rivers to a Maximum Combined Diversion, as outlined in the Settlement Contract. The City also agreed to limit its Sacramento River diversions to a maximum of 225 cfs and a maximum amount of 81,800 AFY and to limit its American River water diversions to a maximum of 675 cfs and up to a maximum amount of 245,000 AFY in 2030, with combined diversions from both rivers not exceeding the Maximum Combined Diversion. With respect to groundwater, while the City’s wholesale agreements primarily rely on surface water, SCWA’s Sacramento International Airport and Metro Air Park service areas receive groundwater from the City. The groundwater supply is pumped from the North American Subbasin. Finally, the City’s 2020 UWMP includes projected demands for normal, single dry, and five consecutive dry years. Further information on how each scenario was calculated is provided in the Method of Analysis subsection of this chapter. The projected supply and demands for existing retail and wholesale customers are summarized in Table 4.11-1.

| Table 4.11-1 | | | | | |
|--|----------------|----------------|----------------|----------------|----------------|
| Retail Water Supply and Demand During Normal, Single Dry, and Multiple Dry Years (AFY) in the Sacramento Service Area | | | | | |
| Hydrologic Condition | 2025 | 2030 | 2035 | 2040 | 2045 |
| Normal Year | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 108,432 | 114,809 | 121,187 | 127,564 | 133,942 |
| Surplus | 224,769 | 235,391 | 229,014 | 222,636 | 216,258 |
| Single Dry Year | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 108,432 | 114,809 | 121,187 | 127,564 | 133,942 |
| Surplus | 224,769 | 235,391 | 229,014 | 222,636 | 216,258 |
| Multiple Dry Year 1 | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 108,432 | 114,809 | 121,187 | 127,564 | 133,942 |
| Surplus | 224,769 | 235,391 | 229,014 | 222,636 | 216,258 |
| Multiple Dry Year 2 | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 109,707 | 116,085 | 122,462 | 128,840 | 138,397 |
| Surplus | 223,493 | 234,116 | 227,738 | 221,360 | 211,803 |
| Multiple Dry Year 3 | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 110,983 | 117,360 | 123,738 | 130,115 | 142,853 |
| Surplus | 222,218 | 232,840 | 226,463 | 220,085 | 207,347 |

(Continues on next page)



| Table 4.11-1 | | | | | |
|--|----------------|----------------|----------------|----------------|----------------|
| Retail Water Supply and Demand During Normal, Single Dry, and Multiple Dry Years (AFY) in the Sacramento Service Area | | | | | |
| Hydrologic Condition | 2025 | 2030 | 2035 | 2040 | 2045 |
| Multiple Dry Year 4 | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 112,258 | 118,636 | 125,013 | 131,391 | 147,308 |
| Surplus | 220,942 | 231,565 | 225,187 | 218,809 | 202,892 |
| Multiple Dry Year 5 | | | | | |
| Supply Totals | 333,200 | 350,200 | 350,200 | 350,200 | 350,200 |
| Demand Totals | 113,534 | 119,911 | 126,289 | 132,666 | 151,764 |
| Surplus | 219,667 | 230,289 | 223,912 | 217,534 | 198,436 |
| <i>Source: City of Sacramento 2020 Urban Water Management Plan, 2021.</i> | | | | | |

Wastewater Conveyance and Treatment

The project site is not currently provided sewer conveyance and treatment services, as the site does not contain structures and has only limited utility infrastructure. Upon annexation into the City as part of the proposed project, the project site would be provided wastewater collection and treatment services by the Sacramento Area Sewer District (SacSewer). It should be noted that prior to December 26, 2023, SacSewer was represented by two independent special districts, a previous iteration of SacSewer and the Sacramento Regional County Sanitation District (Regional San). However, Sacramento LAFCo authorized a reorganization of the districts, dissolving the former SacSewer, annexing the district into Regional San, and subsequently naming the wastewater special district “Sacramento Area Sewer District.”

The City of Sacramento provides wastewater collection for a portion of the City; however, the City-operated wastewater collection system does not include the City’s North Natomas lands and other areas of the City. The community of Natomas’ collection system is owned and operated by SacSewer and discharges to SacSewer’s interceptor system. SacSewer provides wastewater collection for Metro Air Park, the Sacramento International Airport, and existing North Natomas lands. In addition, SacSewer provides conveyance, treatment, and single source of disposal service to a number of contributing agencies, including the City of Folsom, the City of Sacramento, City of Citrus Heights, City of Rancho Cordova, City of Elk Grove, and the City of West Sacramento. In total, SacSewer serves approximately 1.6 million residential, commercial, and industrial customers.

Collected wastewater is discharged into SacSewer’s interceptor system and treated at the district’s Sacramento Regional Wastewater Treatment Plant (SRWTP) located in South Sacramento County. Wastewater is treated to a tertiary standard and discharged into the Sacramento River; however, some effluent is used by the City of Elk Grove for landscape irrigation. The SRWTP is permitted to treat an average dry weather flow (ADWF) of 181 mgd. According to the Targeted MSR, an upgrade of the SRWTP was completed in spring of 2023. The upgrade, known as the EchoWater Project, was conducted to meet new water quality requirements that were issued by the Central Valley Regional Water Quality Control Board (RWQCB) as part of compliance with the requirements established by Regional San’s 2014 National Pollutant Discharge Elimination System (NPDES) permit (No. CA0077682). The requirements were designed primarily to help protect the Sacramento-San Joaquin Delta ecosystem downstream by removing most of the ammonia and nitrates and improving the removal of pathogens from wastewater discharge. The upgrade includes deployment of new treatment



technologies and facilities and increases the quality of effluent discharged into the Sacramento River to ensure that the SRWTP discharge constituents are below permitted discharge limits specified in the NPDES permit.

Flows to the SRWTP have decreased as a result of water conservation efforts over the last 10 years. Additionally, according to the Targeted MSR, adequate capacity for wastewater treatment is anticipated well into the future. Flows in 2014 were approximately 141 mgd, compared to the current permitted capacity of 181 mgd. Further improvements to the SRWTP are not anticipated to be required until after 2050.

As the project site does not contain structures, existing sewer infrastructure is not currently present on-site. An existing SacSewer trunk line is located within Greg Thatch Circle, to the east of SR 99. From the existing SacSewer trunk line, flows are conveyed to the 48-inch SacSewer North Natomas interceptor line, which connects with the trunk line to the southeast of the Club Center Drive/Hampton Falls Way intersection and proceeds south of Del Paso Road within East Commerce Way.

Solid Waste

The project site is not currently provided solid waste collection services. Upon annexation into the City, the site would be provided services by the City of Sacramento's Recycling and Solid Waste Division, which collects solid waste generated throughout the City, including household waste, recycling, construction and demolition materials, and organic wastes. According to the Targeted MSR, more than 660,000 tons of solid waste are generated annually, with the City collecting approximately 250,000 tons. The remainder is collected by franchised waste haulers and individual residents.

Waste collected by the City is initially transported to two locations, including the Sacramento Recycling and Transfer Station (SRTS), which accepts waste from the southern region of the City, and the Sacramento County North Area Recovery Station (NARS), which accepts waste from the north region of the City. Refuse is hauled from both locations to the Sacramento County Kiefer Landfill for processing. Solid waste generated by commercial uses (including multi-family residences of five units or more) is collected by private haulers and transported to the SRTS, NARS, Sacramento County Kiefer Landfill, as well as other facilities, including the Yolo County Central Landfill, L and D Landfill, the Florin Perkins Public Disposal Site, and the Elder Creek Transfer Station. According to the Targeted MSR, the Sacramento County Kiefer Landfill, located at Kiefer Boulevard and Grand Line Road, includes 1,084 acres of total area, with approximately 660 acres of landfill area. The Kiefer Landfill is the primary location for the City of Sacramento's disposal of solid waste. The waste delivered to the landfill is from municipal and industrial sources, with an average of approximately 2,423 tons per day accepted.

Gas, Electric, and Telecommunication Infrastructure

The SMUD is responsible for the acquisition, generation, transmission, and distribution of electrical service throughout the City of Sacramento. In addition to the City of Sacramento, SMUD's service area includes most of Sacramento County and a portion of Placer County. Electricity is produced from a variety of resources, including hydroelectric, thermal (natural gas), wind, and solar facilities. SMUD prepares an Integrated Resource Plan (IRP) that includes targets for system demand, system energy sales, renewable energy, and greenhouse gases. The IRP evaluates various methods and options to meet SMUD's long-term needs and evaluates the impacts of various resource portfolios on SMUD's strategic policies.



Pacific Gas and Electric Co. (PG&E) provides natural gas service to residents and businesses in the Sacramento area. In the winter months, most natural gas resources are imported from Canada on a supply and demand basis, with the balance supplied from production wells in California. In the summer months, gas is acquired at a lower price and is stored in underground storage facilities for use during winter peak use periods.

Telecommunications infrastructure in the area is provided by Xfinity. Existing electrical and telecommunication distribution lines are located along I-5 and Power Line Road in the project vicinity.

4.11.3 REGULATORY CONTEXT

The following discussion contains a summary of regulatory controls pertaining to public services and utilities, including State and local laws and ordinances.

Federal Regulations

The federal environmental laws and policies relevant to public services and utilities are primarily related to water quality, which is addressed in Chapter 4.8, Hydrology and Water Quality, of this EIR.

State Regulations

The following are applicable State regulations associated with public services and utilities related to the proposed project.

Uniform Fire Code

The Uniform Fire Code with the State of California Amendments contains regulations related to construction, maintenance, and use of buildings. Topics addressed in the California Fire Code (CFC) include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The Fire Code contains specialized technical regulations related to fire and life safety.

California Health and Safety Code

State fire regulations are set forth in Sections 15000 et seq. of the California Health and Safety Code, include regulations for building standards (as also set forth in the California Building Code [CBC]), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Proposition 1A/Senate Bill 50

Proposition 1A/Senate Bill (SB) 50 (Chapter 407, Statutes of 1998) is a school construction measure primarily for modernization and rehabilitation of older school facilities and construction of new school facilities. Proposition 1A/SB 50 implemented significant fee reforms by amending the laws governing developer fees and school mitigation.

Proposition 1A/SB 50 also prohibits local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “[...] legislative or adjudicative act [...] involving [...] the planning, use, or development of real property” (Government Code 65996[b]). Additionally, a local agency cannot require participation in a Mello-Roos for school facilities;



however, the statutory fee is reduced by the amount of any voluntary participation in a Mello-Roos. Satisfaction of the Proposition 1A/SB 50 statutory requirements by a developer is deemed to be “full and complete mitigation.”

Quimby Act

California Government Code Section 66477, Subdivision Map Act, referred to as the Quimby Act, permits local jurisdictions to require the dedication of land and/or the payment of in-lieu fees solely for park and recreation purposes. The required dedication and/or fees are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds.

California Green Building Code

The 2022 California Green Building Standards Code, otherwise known as the CALGreen Code (California Code of Regulations [CCR] Title 24, Part 11) is a portion of the California Building Standards Code (CBSC), which became effective on January 1, 2023. The CBSC is adopted every three years by the Building Standards Commission (BSC).

The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The CALGreen standards regulate the method of use, properties, performance, types of materials used in construction, alteration repair, improvement and rehabilitation of a structure or improvement to property. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the current CALGreen Code include, but are not limited to, the following measures:

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources’ (DWR’s) Model Water Efficient Landscape Ordinance (MWEL0);
- 65 percent of construction and demolition waste must be diverted from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle (EV) charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards.

The CALGreen standards also include voluntary efficiency measures that are provided at two tiers and implemented at the discretion of local agencies and applicants. According to Section A4.602 of Appendix A4 of the CALGreen Code, CALGreen’s Tier 1 standards call for a 15 percent improvement in energy requirements, stricter water conservation, 65 percent diversion of construction and demolition waste, 10 percent recycled content in building materials, 20 percent permeable paving, 20 percent cement reduction, and cool/solar-reflective roofs. CALGreen’s more rigorous Tier 2 standards call for a 30 percent improvement in energy requirements, stricter water conservation, 80 percent diversion of construction and demolition waste, 15 percent recycled content in building materials, 30 percent permeable paving, 25 percent cement



reduction, and cool/solar-reflective roofs. The City of Sacramento does not require compliance with Tier 1 or Tier 2 CALGreen standards at this time.

California Water Code

The California Water Code requires coordination between land use lead agencies and public water purveyors. The purpose of this coordination is to ensure that prudent water supply planning has been conducted and that planned water supplies are adequate to meet both existing demands and the demands of planned development.

Water Code Sections 10910 to 10915 (inclusive), sometimes referred to as SB 610, require land use lead agencies: 1) to identify the responsible public water purveyor for a proposed development project, and 2) to request from the responsible purveyor, a “Water Supply Assessment.” The purposes of the WSA are (a) to describe the sufficiency of the purveyor’s water supplies to satisfy the water demands of the proposed development project, while still meeting the current and projected water demands of customers, and, (b) in the absence of a currently sufficient supply to describe the purveyor’s plans for acquiring additional water. Water Code Sections 10910 to 10915 delineate the specific information that must be included in the WSA.

According to CEQA Guidelines Section 15155, a “water-demand project” means:

- A. A residential development of more than 500 dwelling units.
- B. A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- C. A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- D. A hotel or motel, or both, having more than 500 rooms.
- E. An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- F. A mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.
- G. A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.
- H. For public water systems with fewer than 5,000 service connections, a project that meets the following criteria:
 1. A proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of a public water system's existing service connections; or
 2. A mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential development that would represent an increase of 10 percent or more in the number of the public water system's existing service connections.

The proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, located immediately south of Bayou Way. Therefore, the project meets criterion E.

Assembly Bill 1327

Assembly Bill (AB) 1327, the Solid Waste Reuse and Recycling Access Act of 1991, requires jurisdictions to adopt ordinances requiring development projects to provide adequate storage area



for collection and removal of recyclable materials. The City of Sacramento has adopted such an ordinance (Sacramento City Code Section 13.10.320).

Assembly Bill 1881

AB 1881, the Water Conservation in Landscaping Act of 2006, required the DWR to update the MWELo. Furthermore, AB 1881 required local agencies to adopt the updated model ordinance or an equivalent ordinance by January 1, 2010. If local jurisdictions failed to adopt the updated model ordinance or an equivalent by January 1, 2010, the DWR's updated model ordinance would automatically be adopted by statute. The City of Sacramento has adopted a WELo (Sacramento City Code Chapter 15.92).

Senate Bill 1016

Enacted in 2007, SB 1016 amended portions of the California Integrated Waste Management Act, allowing the California Integrated Waste Management Board (CIWMB) to use per capita disposal as an indicator in evaluating compliance with the requirements of AB 939. Jurisdictions track and report their per capita disposal rates to CalRecycle.

According to CalRecycle's jurisdiction disposal records, Sacramento disposed of 694,528.79 tons in 2021.¹⁴ The City's per capita waste disposal rate for residents was 7.3 pounds per day (lbs/day); the per capita disposal rate target for residents according to CalRecycle was 6.9. The per capita waste disposal rate for Sacramento employees in 2021 was 12.4 lbs/day; the CalRecycle per capita disposal rate target was 10.8 lbs/day.

California Integrated Waste Management Act – Assembly Bill 939

AB 939, the California Integrated Waste Management Act of 1989, contains requirements affecting solid waste disposal in California. According to AB 939, all cities and counties are required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. Solid waste plans are required to explain how each city's AB 939 plan will be integrated within the respective county plan. The plans must promote (in order of priority) source reduction, recycling and composting, and environmentally safe transformation and land disposal. Cities and counties that do not meet this mandate are subject to daily fines of \$10,000.

Local Regulations

The following are applicable local public services and utility regulations related to the proposed project.

Sacramento Local Agency Formation Commission Policies, Standards and Procedures for LAFCo Manual

The following policies and standards from Sacramento LAFCo's Policies, Standards and Procedures for LAFCo manual related to public services and utilities are applicable to the proposed project.

¹⁴ California Department of Resources Recycling and Recovery. *Jurisdiction Diversion/Disposal Rate Detail*. Available at: <https://calrecycle.ca.gov/lgcentral/datatools/reports/divdisprtsum/>. Accessed June 2023.



LAFCo General Policies

- Policy 6 LAFCo will favorably consider those applications that do not shift the cost for services and infrastructure benefits to other service areas.
- Policy 9 Community needs are met most efficiently and effectively by governmental agencies which:
- are already in existence;
 - are capable of coordinating service delivery over a relatively large area;
 - provide more than one type of service to the territory which they serve.

General Standards – Spheres of Influence

- Standard 2 Spheres of Influence are the primary planning tool for LAFCo. To update spheres of influence, agencies must have an updated Municipal Service Review which meets the standards as set forth in Government Code Section 56430.
- Standard 3 The LAFCo will require that any agency requesting a Sphere of Influence change through LAFCo must have an updated Municipal Service Review. The LAFCo will approve a proposal only if the proposed service provider is the most efficient provider of services with an acceptable cost, as demonstrated in the provider's Municipal Service Review.

General Standards – Standards for Annexation to and the Detachment from All Agencies

- Standard 4 The annexation must be consistent with the applicable Municipal Service Reviews. An annexation or detachment shall be approved only if the services element of the Spheres of Influence Plan of the affected agency or agencies demonstrates that adequate services will be provided within the time frame needed by the inhabitants of the annexed or detached area. Proposed annexations for land areas that lie outside of the current and next five-year increments of projected service delivery in the services element are presumed not to comply with this standard unless the applicant clearly establishes that special and unique circumstances exist which ensure the provision of quality services during the applicable time frame for the affected area consistent with the other standards.



- Standard 5 The annexation must provide the lowest cost and highest quality of urban services for the affected population, LAFCo will approve an annexation or detachment only if the commission determines that the annexing agency possesses the capability to provide the most efficient delivery of applicable urban services for the affected population.
- Standard 9 An annexation or attachment shall not be approved merely to facilitate the delivery of one or a few services to the detriment of the delivery of a larger number of services or services more basic to public health and welfare.
- Standard 11 The LAFCo Commission shall take one of the following three actions on an application for annexation or detachment:
- a. Approve the application if it has found the change to result in the most efficient delivery of services for the affected population and complies with other applicable standards;
 - b. Approve the application on the condition that the applicant agree to actions necessary to maximize -the efficiency of urban services. These may include, but are not limited to:
 - (1) Waiver of detachment from an existing service provider or, in the alternative, appropriate detachment fees;
 - (2) Entering into a Joint Powers Agreement with another service provider.
 - c. Deny the annexation on the grounds that a more efficient combination of services for the affected population may be provided by either existing or a combination of new and existing service providers.

In the event of such a denial, LAFCo may present to the applicant, the conducting agency, and affected service providers, a statement of the reasons for denial, and recommendations for actions necessary to ensure the most efficient form of urban services delivery to the affected population.

Specific Standards by Type of Action – Annexations to Cities

- Standard 6 The LAFCo opposes extension of services by a city without annexation unless such extension is by contract



with another governmental entity or a private utility or as otherwise in compliance with Government Code section 56133.

Specific Standards by Type of Action – Annexations to Districts

Standard 3 The LAFCo opposes extension of services by a district without annexation unless such extension is by contract with another governmental entity or a private utility or as otherwise in compliance with Government Code section 56133.

Specific Standards by Type of Action – Reorganization

The LAFCo will evaluate each component organizational change which makes up a reorganization proposal independently. In so doing, the LAFCo will follow the standards presented below.

Standard 1 LAFCo will strive to ensure that each separate territory included in the proposal, as well as affected neighboring residents, tenants, and landowners, receive services of an acceptable quality from the most efficient and effective service provider after the reorganization is complete.

Standard 2 The service quality, efficiency, and effectiveness available prior to reorganization shall constitute a benchmark for determining significant adverse effects upon an interested party. The LAFCo will approve a proposal for reorganization which results in significant adverse effects only if effective mitigating measures are included in the proposal.

Specific Standards by Type of Action – Amendments to Spheres of Influence

Standard 2 The Sphere of Influence Municipal Service Review must be current before additions to a Sphere of Influence will be approved by LAFCo.

Standard 4 Amendment proposals must be consistent with an updated Sphere of Influence and/or Municipal Service Review.

Standard 5 An applicant for amendment to a Sphere of Influence must demonstrate a projected need or lack of need for service.

Standard 9 The LAFCo will deny proposals that would result in significant unmitigable adverse effects upon other service recipients or other agencies serving the affected area unless the approval is conditioned to avoid such impacts.



City of Sacramento 2040 General Plan

The following goals and policies from the City of Sacramento 2040 General Plan related to public services and utilities are applicable to the proposed project.

Public Facilities and Safety Element

| | |
|-----------------|--|
| Goal PFS-1 | Responsive police and fire services that ensure a high level of public safety. |
| Policy PFS-1.1 | Crime and Law Enforcement. The City shall continue to work cooperatively with the community, regional law enforcement agencies, local government agencies, and other entities to provide quality police service that protects the long-term health, safety, and well-being of the community. |
| Policy PFS-1.9 | Equipment, Facilities, and Staffing. The City shall locate and maintain police and fire equipment, facilities, and staffing at locations and levels that allow for effective service delivery. |
| Policy PFS-1.12 | Cooperative Delivery of Services. The City shall maintain mutual aid relationships with the County of Sacramento and other local, State, and federal agencies that promote regional cooperation in the delivery of services and allow for supplemental aid from other police and fire personnel in the event of emergencies. |
| Policy PFS-1.14 | Timing of Services. The City shall monitor the pace of residential and commercial growth in Sacramento and make best efforts to match that growth with commensurate increases in public safety personnel, equipment, and facilities. |
| Policy PFS-1.15 | Development Fees for Facilities and Services. The City shall require development projects to contribute fees to ensure the provision of adequate police and fire services. |
| Policy PFS-1.16 | Development Review. The City shall continue to require new development projects to incorporate safety features and include the Sacramento Police Department (SPD) and the Sacramento Fire Department (SFD) in the development review process to ensure that projects are designed and operated in a manner that minimizes the potential for criminal activity and fire hazards and maximizes the potential for responsive police and fire services. |
| Goal PFS-3 | Efficient, high-quality utility infrastructure and services to meet the needs of residents and business throughout the city. |



| | |
|-----------------|---|
| Policy PFS-3.1 | Provision of Adequate Utilities. The City shall continue to provide reliable water, wastewater, and stormwater drainage utility services. |
| Policy PFS-3.2 | Utility Sustainability. The City shall continue to improve the sustainability, resilience, and energy efficiency of its facilities, infrastructure, and operations consistent with the Climate Action and Adaptation Plan and the goal of achieving carbon neutrality by 2045. |
| Policy PFS-3.3 | Development Impacts. Through the development review process, including through development impact fees and offsite improvements constructed by new development, the City shall ensure that adequate public utilities and services are available to serve new development. |
| Policy PFS-3.5 | Water Treatment Capacity and Infrastructure. The City shall plan, secure funding for, and procure sufficient water treatment capacity and infrastructure to meet projected maximum daily water demands. Options to explore may include the following: <ul style="list-style-type: none">• Expansion or rehabilitation of existing treatment plant infrastructure;• Development and management of groundwater wells; and• Collaboration on regional water supply solutions. |
| Policy PFS-3.10 | Meet Projected Needs. The City shall foster the orderly and efficient expansion of facilities and infrastructure to adequately meet projected needs, comply with current and future regulations, and maintain public health, safety, and welfare. Infrastructure and facility planning should discourage over-sizing of infrastructure that could induce growth at the edges of the city beyond what is anticipated in the General Plan. |
| Policy PFS-3.11 | Joint-Use Facilities. Wherever feasible, the City shall pursue the development of joint- use water, stormwater quality, flood control and other utility facilities as appropriate in conjunction with schools, parks, bike paths, golf courses, and other suitable uses to achieve economy and efficiency in the provision of services and facilities. |
| Policy PFS-3.12 | Safe and Compatible Utility Design. The City shall ensure that public utility facilities are designed to be safe and compatible with adjacent uses. |



| | |
|-----------------|---|
| Policy PFS-3.13 | Impacts to Environmentally Sensitive Lands. The City shall consider the impacts on environmentally sensitive areas and habitats when locating and designing municipal utilities. |
| Policy PFS-3.14 | Underground Utilities. The City shall require new development to underground utility lines wherever feasible and coordinate with electricity and telecommunications providers to underground existing overhead lines where feasible. |
| Goal PFS-4 | A reliable supply of high-quality water that meets projected needs within the City's place of use. |
| Policy PFS-4.8 | New Development. The City shall ensure that water supply capacity is in place prior to granting building permits for new development. |
| Goal PFS-5 | Sensible waste management that reduces disposal in landfills and supports cost-effective sustainability efforts. |
| Policy PFS-5.1 | Solid Waste Reduction. The City shall reduce the amount of solid waste that is disposed in landfills by promoting source reduction and recycling throughout Sacramento and by expanding the range of programs and information available to local residents and businesses, consistent with State requirements. |
| Policy PFS-5.2 | Collection and Recycling Services. The City shall provide for continued solid waste collection and recycling services in Sacramento, including contracting with franchise waste haulers, and ensuring adequate transfer station facilities capacity and the availability of adequate landfill capacity to meet future needs. |

Youth, Parks, Recreation, and Open Space Element

| | |
|-----------------|---|
| Goal YPRO-1 | An integrated system of parks, open space areas, shared-use paths, and recreational facilities that are welcoming, well-maintained, safe, and accessible to all the diverse communities of Sacramento. |
| Policy YPRO-1.4 | Parkland Dedication Requirements. The City shall continue to require that new residential development projects contribute toward the provision of adequate parks and recreational facilities to serve the new residents, either through the dedication of parkland, the construction of public and/or private recreation facilities, or the payment of parkland in-lieu fees, consistent with the Quimby Ordinance. To achieve the level of service for all parkland in all areas of the city, the City shall seek |



other funding resources to prioritize park needs in park deficit areas.

- Policy YPRO-1.5 **Incentivizing Onsite Public Facilities.** The City shall continue to provide Park Impact Fee (PIF) credit for development projects that provide publicly accessible parks, plazas, and parkways onsite that promote active or passive recreational opportunities and serve as neighborhood gathering points.
- Policy YPRO-1.9 **Timing of Services.** The City shall monitor the pace and location of new development through the development review process and long-range planning efforts to strive to ensure that development of parks, recreation programming, and community- serving facilities and services keeps pace with growth.
- Policy YPRO-1.19 **Sustainable Design.** The City shall design and construct parks, public spaces, and recreational facilities for flexible use, energy/water efficiency, reduced greenhouse gas emissions and air pollution, adaptability for long-term use, and ease and cost of maintenance.

Sacramento City Code

Sections from the Sacramento City Code related to the adoption of the CBSC, the undergrounding of utilities, and the City's WELO, are discussed below.

Section 15.04.050 – Adoption of the 2022 California Building Standards Code

Buildings constructed within the project site would be subject to the current building standards found in the CBSC, which includes, but is not limited to, the CBC (CCR Title 24, Part 2) and the California Fire Code (CFC) (CCR Title 24, Part 9). The CBC and CFC address roofing materials, automatic sprinkler systems, emergency access, access gates, sprinkler systems, fire alarms within buildings, and construction of access roads to accommodate fire apparatus. The CFC requires that an automatic fire sprinkler and/or fire extinguishing system be installed throughout new one- and two-family dwellings and commercial buildings 3,600 sf and larger.

Section 12.12.260 – Undergrounding

Sacramento City Code Section 12.12.260 requires that in all areas of the City where cables, wires, and other similar facilities of a utility company are placed underground, newly installed cables, wires, and other facilities must be installed underground. In addition, where such utility facilities are installed aboveground, such facilities must be installed underground in the event that new development within the vicinity includes underground utility facilities.

Chapter 15.92 – Water Efficient Landscape Requirements

The City's WELO is codified in Sacramento City Code Chapter 15.92 and contains requirements for new construction projects with an aggregate landscape area equal to or greater than 500 sf that require a building or landscape permit, Plan Check, Plan Review, or Design Review. As part of compliance with the WELO, new construction projects meeting the aforementioned criteria must submit a landscape documentation package for review and approval to the Chief Building



Official. The landscape documentation package must include, but not be limited to, the total landscape area in sf, information on the project type, information on the water supply type, and water budget calculations.

City of Sacramento Standard Specifications

Section 26 and 27 of the City of Sacramento Standard Specifications provide supplemental design considerations for sewer and water utility line improvements, respectively. The Standard Specifications set forth requirements with which all construction, trenching, excavation, and improvement work must conform.

City of Sacramento Parks and Recreation Master Plan 2005-2010

The City of Sacramento Parks and Recreation Master Plan 2005-2010 is principally a guiding policy document, strategic in orientation, that charts the growth, direction, priorities, and agenda of the City's YPCE Department and establishes policies to guide decision-making by City staff and officials. Map 7 of the Parks and Recreation Master Plan 2005-2010 shows growth opportunity areas within the City's 2030 General Plan planning area.¹⁵ In addition, the YPCE Department released a draft update to the Parks and Recreation Master Plan 2005-2010, titled Parks Plan 2040 and anticipated for final adoption in June 2024. The Parks Plan 2040 identifies the community's needs and priorities for the next 20 years, as they relate to parks and facilities, youth development, and recreation and community enrichment. The Parks Plan 2040 inventories existing physical and programmatic assets and identifies trends, needs, and level of service goals. The Parks Plan 2040 refines the policies, actions, and tools that YPCE will use to guide the provision of parks, recreation facilities, programs, events, and services.

City of Sacramento Park Impact Fee Nexus Study Update

This Park Impact Fee Nexus Study Update was prepared for the City of Sacramento pursuant to the Mitigation Fee Act set forth by Government Code Section 66000. The purpose of the Park Impact Fee Nexus Study Update was to establish the legal and policy basis to allow the City to impose a fee on new residential and non-residential development within the City. The City originally adopted the Park Impact Fee in August of 1999. The fee was updated in April of 2002, and again in April of 2004. Modifications were also proposed in 2007 and 2011, but were not acted upon, owing to the economic recession occurring at that time. According to the City of Sacramento's Fees and Charges database, the Park Development Impact Fee is currently assessed at a total rate of \$0.22 per sf for new industrial development not in the Central City or a Housing Incentive Zone, which includes a \$0.17 per sf rate for Neighborhood/Community fees and a \$0.05 per sf rate for Citywide fees.¹⁶

4.11.4 IMPACTS AND MITIGATION MEASURES

The section below describes the standards of significance and methodology utilized to analyze and determine the proposed project's potential project-specific impacts related to public services and utilities. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

¹⁵ It should be noted that as part of the City's 2040 General Plan, Map YPRO-1 shows proposed park locations within the City limits.

¹⁶ City of Sacramento. *Fees and Charges*. Available at: <https://www.cityofsacramento.gov/finance/fees-and-charges>. Accessed April 2024.



Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, determination of significant impacts is based on whether the proposed project would result in the following:

- 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;
 - Police protection;
 - Schools;
 - Parks;
 - Other public facilities;
- 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;
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment;
- 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;
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- 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;
- 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; or
- Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

Impacts related to groundwater and storm drainage facilities are addressed in Chapter 4.8, Hydrology and Water Quality, of this EIR.

Method of Analysis

In order to determine the potential for the project to result in substantial adverse impacts associated with the provision of new or altered government facilities, relevant public services and utilities planning documents were reviewed, including, the City of Sacramento 2040 General Plan, the City of Sacramento Master EIR, and the City of Sacramento 2020 UWMP. In addition, information related to public services was primarily drawn from the Targeted MSR (see Appendix K of this EIR) prepared for the proposed project by Wood Rodgers. Information related to water supply and sewer conveyance was primarily drawn from the Preliminary Water Study (see Appendix L of this EIR) and the Sewer Study (see Appendix M of this EIR), respectively, both of which were also prepared for the proposed project by Wood Rodgers. The method of analysis used in each of the aforementioned assessments is discussed further below.



Targeted Municipal Services Review

The Targeted MSR was prepared to assist the Sacramento Local Agency Formation Commission (LAFCo) in its evaluation of the proposed Sphere of Influence (SOI) Amendment for the respective boundaries of the City of Sacramento and SacSewer. The Targeted MSR complies with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Act), pursuant to Government Code Section 56000, et seq., and evaluates existing and future service conditions for the geographic area subject to the requested SOI Amendment. An MSR provides the means to synthesize data regarding a local agency's operations and public services, ability to provide mandated services, and/or opportunities to provide more efficient services. Government Code Section 56375 permits a LAFCo to take action on recommendations found in an MSR, which can range from initiating studies for changes of organization, updating a SOI, or initiating a change in organization.

An MSR also provides information to help a LAFCo make decisions on a proposed SOI boundary change, including data necessary to determine if an agency has the capability to serve an expanded area and data related to an agency's financial condition, revenue sources, and projected expenses. In addition, an MSR outlines what infrastructure may be needed to accommodate expansion of public services. Finally, an MSR can recommend changes in an agency or district's organization, such as consolidation, dissolution, merger, establishment of a subsidiary district, or the creation of a new agency that typically involves a consolidation of agencies.

The Targeted MSR prepared for the proposed project focuses on the service areas currently outside of Sacramento's incorporated boundary. The Targeted MSR serves as an information base to update the City of Sacramento's SOI to accommodate the project site, as proposed for development by the project, and to provide a foundation for the public, City of Sacramento, Sacramento County, and Sacramento LAFCo to consider changes to the City's existing SOI boundary.

To provide Sacramento LAFCo with the information needed to make a determination regarding each of the elements identified above, the Targeted MSR includes the following public service/issue area discussions:

- Growth and Population Projections;
- Disadvantaged Communities;
- Public Facilities and Services;
 - Water;
 - Wastewater;
 - Circulation and Roadways;
 - Animal Care;
 - Code Enforcement;
 - Law Enforcement;
 - Fire Protection;
 - Solid Waste;
 - Storm Drainage and Flood Control;
 - Parks and Recreation;
 - Libraries;
 - Electricity and Natural Gas;
- Financial Ability to Provide Services;



- Shared Facilities Opportunities;
- Government Structure and Accountability; and
- Other Matters Related to Effective Service Delivery.

Preliminary Water Study

The Preliminary Water Study was prepared to analyze the proposed water infrastructure associated with development of the proposed industrial park and commercial uses. The Preliminary Water Study addresses proposed land uses, potable water system hydraulics, and proposed infrastructure-level improvements through an Innovyze InfoWater hydraulic model analysis (version 12.4.13) of the conceptual piping system, which was sized and laid out in accordance with input provided by the City of Sacramento on March 9, 2023.

The proposed project’s domestic and fire demands were identified, calculated, and input into the system model. The regional City system is shown on Exhibit F of the Preliminary Water Study. The nearest existing City water storage tank is located 4,800 feet south and east of the project site along El Centro Road and has a storage capacity of three million gallons (mg). The Lanfranco Circle point of connection is currently fed by the El Centro Reservoir and has pumping capacity as shown in Exhibit F of the Preliminary Water Study. The potential layout for the proposed project can be seen in Exhibit G of the Preliminary Water Study. The layout was developed in accordance with the City’s comments and focuses on only the public water mains that would serve the project. For visual purposes, an illustration to show the layout of the public mains versus the private mains is provided in Exhibit J of the Preliminary Water Study.

Land use for the proposed project was assumed based on the Preliminary Site Plan and land use summary (see Figure 3-3 in the Project Description chapter of this EIR), which is provided in Exhibit B and Exhibit C of the Preliminary Water Study. A breakdown of the land use acreages incorporated within the InfoWater model is summarized in Table 4.11-2, which used net acres.¹⁷

| Table 4.11-2 Preliminary Water Study Land Use Acreages | |
|---|--------------------------|
| Land Use Designation | Total Net Acreage |
| Mixed Use ¹ | 13.4 |
| Industrial | 235.6 |
| Future Industrial | 83 |
| Total | 332 |
| ¹ It should be noted that although the Mixed Use land use designation was applied as part of the model, the proposed project would include 13.4 acres of Highway Commercial Planned Use Development (HC-PUD) uses. | |
| Source: Wood Rodgers, 2023. | |

Node elevations were assumed to be at street elevation and were based on the preliminary earthwork exhibit included in Appendix B of the Preliminary Water Study. The project site was assumed to be designated to allow for industrial and mixed-use development. The assumption was used to calculate water demands for the project site using the demand factors provided in the City of Sacramento 2018 Water Study Design Manual. For fire flow requirements, Wood Rodgers used planning numbers found in the City’s 2018 Water Study Design Manual, pursuant to the City’s direction. Any node that was near an industrial lot was assigned a fire flow of 4,500

¹⁷ The term “gross acre” refers to all land within a given boundary. The term “net acre” refers to land measured within a given boundary, minus the acreages of certain features, such as roads, utilities, and open space.



gallons per minute (gpm). For the mixed-use buildings, a fire flow of 3,500 gpm was assigned to align with the City requirements. A summary of the demands is presented in Table 4.11-3.

| Table 4.11-3 Preliminary Water Study Demand Summary | | | | | | |
|--|--------------------------|--|-----------------------------|------------------------|------------------------|------------------------|
| Land Use Designation | Total Net Acreage | ADD Unit Water Demand¹ | | Demand (gpm) | | |
| | | AFY/Acre² | GPM/Acre³ | ADD¹ | MDD⁴ | PHD⁵ |
| Mixed Use ⁶ | 13.4 | 2 | 1.24 | 17 | 33 | 43 |
| Industrial | 235.6 | 0.9 | 0.56 | 132 | 264 | 343 |
| Future Industrial | 83 | 0.9 | 0.56 | 46 | 93 | 120 |
| Total | 332 | -- | -- | 195 | 390 | 507 |
| ¹ ADD = Average day demand ² AFY/Acre = Acre-feet per year per acre ³ GPM/Acre = Gallons per minute per acre ⁴ MDD = Maximum day with fire flow demand ⁵ PHD = Peak hour demand ⁶ It should be noted that although the Mixed Use land use designation was applied as part of the model, the proposed project would include 13.4 acres of HC-PUD uses. | | | | | | |
| Source: Wood Rodgers, 2023. | | | | | | |

For the Preliminary Water Study, the City provided a graphic showing the pressure rating curve at the connection point in Bayou Way, which takes into consideration the full buildout and losses from the Northlake subdivision (formerly Greenbriar). Because the boundary condition takes into consideration all infrastructure for Northlake and other existing uses, the Northlake modeling entities were omitted from the Preliminary Water Study. For the Lanfranco Circle boundary condition, the City provided a graphic showing the pressure rating curve at the connection point. It should be noted that the model was only capable of representing flow and head (or hydraulic grade line [HGL]), so a conversion was performed to convert the data as required. The boundary conditions at Bayou Road and Lanfranco Circle can be seen in Appendix D of the Preliminary Water Study.

Sewer Study

The sewer equivalent single-family dwelling units (ESD) that make up the sewer demand in the Sewer Study include approximately 81 ESDs of commercial units, 1,870 industrial (warehouse) ESDs, 516 detention basin ESDs, 152 ESDs of roadway/right-of-way (ROW), pump stations and buffer spaces (see Table 4.11-4). All sewer facilities would be permanent. The sewer pump station that would serve the proposed project would be developed in a single phase to meet the ultimate ADWF and peak wet weather flows (PWWF). Based on the land use acreages proposed as part of the project and the aforementioned ESDs, the combined ADWF and PWWF demand is expected to be 0.81 mgd and 2.09 mgd, respectively.

The Sewer Study provides calculations of the ultimate sewer flows that are expected to be generated within the project site (i.e., full buildout of the industrial park and nonparticipating parcels) by using acreage and density information provided in the Preliminary Site Plan (see Figure 3-3 in the Project Description chapter of this EIR) and ADWF in Section 201.1 of the SacSewer Standards and Specifications.



| Table 4.11-4 Land Use, Acreages, and Sewer ESDs | | | |
|--|------------------------------|------------------------------------|--------------|
| Land Use Description | Area (acres) ¹ | Sewer Density (du/ac) ² | ESDs |
| Commercial | 13.4 | 6 | 80.4 |
| Industrial | 311.7 | 6 | 1,870.2 |
| Stormwater Detention Basin | 86 | 6 | 516 |
| Land Buffer | 2.3 | 6 | 13.8 |
| Pump Station (Sewer and Stormwater) | 0.9 | 6 | 5.4 |
| Internal Roadways and Caltrans Parcel | 22.2 | 6 | 133.2 |
| I-5 Corridor | 37.9 | 0 | 0 |
| Total | 474.4 | | 2,619 |
| ¹ Net acres ² Dwelling units per acre = du/ac | | | |
| Source: Wood Rodgers, 2023. | | | |

Several assumptions were used in the design approach for the Sewer Study and are provided below:

- Any upstream development will not need to use the sewer infrastructure installed as part of the proposed project. SacSewer’s Expansion Trunk Shed Plans for the Sacramento International Airport, Metro Air Park, and lands south of the airport and west of the project site will convey to existing infrastructure within the Metro Air Park sewer shed;
- A significant increase in on-site densities will not occur that could affect the planned on-site facilities;
- For the Sewer Study, the location of the trunk and collectors are schematic to more clearly show where sewer is loaded into the demand calculations. The exact horizontal location, rim elevation, and depth of the pipe and manhole infrastructure will be determined during preparation of the Level 2 and Level 3 Sewer Studies;
- Pipe sizes and flow rates were calculated based on the SacSewer Standards and Specifications and adhere to SacSewer “Minimum Sewer Study Requirements” criteria; and
- Areas that are not expected to generate sewer demand are included in the demand calculations. The areas include stormwater detention basins, land buffers, pump stations, a California Department of Transportation (Caltrans) parcel dedication, and on-site roadways.

The following general procedures were used in the development of the Sewer Study:

1. Gross areas and land use information based on the Preliminary Site Plan were used to calculate sewer flows;
2. Sub-shed areas were defined primarily by building sites, then by topographic features;
3. ESDs were calculated for each shed based on the underlying land use and shed area;
4. Each ESD was assumed to have a 310-gallon-per-day (gpd) ADWF;
5. Flows were determined based on the SacSewer Standards and Specifications and on the design criteria and assumptions identified in the Sewer Study; and
6. A permanent pump station will be located on Lot F, as shown in the Preliminary Site Plan;
7. The pump station will be served by a permanent force main discharging to a SacSewer interceptor. The final alignment design and discharge location of the force main will be



one of three alignment options, as shown in Figure 3-4 in the Project Description chapter of this EIR.

The SacSewer Standards and Specifications, dated November 30, 2021, were used as the basis for the sewer design. The flows were generated using the information found in Chapter 201 (Capacity Design) of the SacSewer Standards and Specifications. Generally, the minimum allowable ESD densities identified in Chapter 201 were used; however, higher densities were used as established by the proposed land uses (see Table 4.11-4). For further details of the flow criteria, please see Table 3-1 in the Sewer Study.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts related to public services, utilities, and service systems is based on the implementation of the proposed project in comparison with the standards of significance identified above.

4.11-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Based on the analysis below, the impact is *less than significant*.

As discussed in the Project Description chapter of this EIR, the proposed project consists of an industrial park within an approximately 353.5-acre portion of the project site, as well as several nonparticipating parcels, comprised of approximately 83 acres, that would result in first tier entitlements for future industrial uses of approximately 1,404,800 sf. The footprints of both project components are currently served by the SFD and would continue to be served by the SFD following project approval. Thus, the following discussion applies to the potential for both project components to result in impacts related to the provision of services and/or facilities provided by the SFD.¹⁸ Given that the proposed off-site force main would be sized to accommodate flows from the project site, installation of the off-site force main would not indirectly induce population growth such that the SFD would require new or expansion of existing facilities, the construction of which would result in potential environmental impacts.

Industrial Park and Nonparticipating Parcels

The relevant CEQA threshold for this discussion is whether new or physically altered fire stations are needed to meet response times or other performance objectives, the construction of which could cause environmental impacts. The nearest SFD fire station to the project site is Station 43, which is located at 4201 El Centro Road, approximately 2.5 miles southeast of the site. Although each of SFD's 24 fire stations operates within a specific response district encompassing the immediate geographical area around the station, all fire agencies within Sacramento County (i.e., SFD, Sacramento

¹⁸ It should be noted that, as discussed in the Project Description chapter of this EIR, the project site encompasses 474.4 acres. In addition to the 353.5-acre industrial park footprint and the 83 acres of nonparticipating parcels, the project site includes 37.9 acres of Caltrans I-5 fee title ROW.



Metropolitan Fire District, Sac Airport Fire, Cosumnes Community Services District Fire Department, and the Folsom Fire Department) share an automatic aid agreement that allows response from the closest fire unit regardless of jurisdiction. According to the Targeted MSR, the SFD seeks to respond to fire incidents and medical emergencies within four minutes, which is generally consistent with General Plan Policies PFS-1.14, -1.15, and -1.16. The foregoing policies generally provide that the SFD shall strive to maintain emergency response times that provide optimal fire protection and emergency medical services.

As the proposed project primarily consists of industrial uses, with a limited number of commercial uses also proposed, the project would not be anticipated to generate a substantial amount of new population within the SFD service area, as the project does not include new residential units and the majority of jobs created by the project would be filled primarily by those already residing within the Sacramento region. As such, the proposed project would not be expected to substantially increase the need for additional SFD fire personnel, equipment, and facilities through population growth.

Nevertheless, due to the industrial nature of the project, the potential exists for work-related injuries that necessitate emergency medical care to occur during project operation. As discussed further in Chapter 4.10, Transportation, of this EIR, based on assumptions used by the transportation consultant, development of the project could generate a total of approximately 4,000 employees. Given the relatively close proximity of Station 43 to the project site, the SFD is anticipated to be capable of responding to emergency medical and fire incidents at the project site within the department's four-minute response time goal. In addition, through the automatic aid agreement between fire agencies within Sacramento County, the most efficient fire protection and emergency medical services would be available to the project site. For example, Metro Air Park is scheduled to provide land and facilities for a new fire station near the project site. The 10,000-sf fire station site will be located approximately 1.4 miles north of the project site and operated by the Sacramento Metropolitan Fire District, which would allow for immediate response to fire and emergency medical incidents at the project site.

Furthermore, all structures included as part of the proposed project would be constructed in accordance with the applicable standards set forth by the CBC and CFC. Consistent with the CBC, the design of the proposed buildings would include the installation and use of automatic fire sprinklers. Fire alarm systems would be incorporated pursuant to CFC requirements. Such features would reduce the potential for fires to occur and spread within the proposed structures, thereby reducing the demand for fire protection services associated with the proposed project. Thus, the project would not result in the need for new or physically altered SFD stations to meet response times or other performance objectives, the construction of which could cause environmental impacts.

General Plan Policies PFS-1.14, -1.15, and -1.16 establish the City's commitment to ensuring the SFD has the necessary levels of facilities, apparatus, equipment, and staffing to provide adequate fire protection and emergency medical services within the department's service area. The City funds the SFD budget, in part, through revenues generated from payment of application fees for applicable permits and clearances by



new development. In addition, new development within the City is subject to applicable development impact fees to ensure a fair-share contribution is made to finance the purchase of new or expansion of existing SFD facilities, apparatus, and equipment necessary for the purposes of maintaining adequate service levels. For example, the project site is currently contiguous with the City's North Natomas Finance Plan Area. As part of project approval, the proposed project would be subject to the North Natomas Planning Area Development Fees. Pursuant to Sacramento City Code Section 18.24.050, the North Natomas Planning Area Public Facilities Fee is assessed at a rate of \$238,272 per net acre for Convenience Commercial uses; \$140,361 per net acre for Community Commercial uses; and between \$49,752 and \$57,527 per net acre for Light Industrial uses. Thus, through payment of the North Natomas Planning Area Development Fees, buildout of the project site with the proposed uses would include a fair-share contribution to the City for the provision of SFD services to the site.

Finally, conservatively estimating that all permanent positions associated with the project would be filled by new residents to the Sacramento region would result in a 0.7 percent increase to the existing City population.¹⁹ Although an associated incremental increase in demand for SFD services could result from the foregoing population increase, pursuant to CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions that exist in the area affected by the proposed project. "Environment" means the physical conditions that exist within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance (see Public Resources Code Section 21060.5). The courts have affirmed this understanding. In the case *City of Hayward v. Board of Trustees of the California State University*, the First District Court of Appeal affirmed that the focus of CEQA analysis should be limited to physical environmental impacts related to a project.²⁰ The court held that, "[t]he need for additional fire protection services is not an *environmental* impact that CEQA requires a Project Proponent to mitigate." As such, the creation of additional demand for SFD fire protection services as part of the proposed project would not, by itself alone, constitute an impact on the environment, as established by the CEQA Guidelines.

Based on the above, development of the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection services and/or facilities, the construction of which could cause significant environmental impacts, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

¹⁹ Based on 2019 population total for the City of Sacramento presented in the Land Use and Planning/Population and Housing chapter of this EIR.

²⁰ First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. (November 30, 2015) 242 Cal.App.4th 833.



4.11-2 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Based on the analysis below, the impact is *less than significant*.

The project site is currently provided law enforcement services by the Sacramento County Sheriff's Office. Following annexation into the City of Sacramento, the footprints of the proposed industrial park and the nonparticipating parcels would be provided police protection services by SPD. Thus, the following discussion applies to the potential for both project components to result in impacts related to the provision of services and/or facilities provided by the SPD. Given that the proposed off-site force main would be sized to accommodate flows from the project site, installation of the off-site force main would not indirectly induce population growth such that the SPD would require new or expansion of existing facilities, the construction of which would result in potential environmental impacts.

Industrial Park and Nonparticipating Parcels

The SPD is headquartered at the City's Public Safety Center at 5770 Freeport Boulevard and is supported by several substations throughout the City. The nearest police substation to the project site is the Central Command Richards Police Facility, which is located at 300 Richards Boulevard, approximately 5.4 miles to the southeast of the site. According to the Targeted MSR, the SPD does not have an adopted officer-to-resident ratio. Unofficially, the SPD maintains an unofficial goal of 2.0 to 2.5 sworn police officers per 1,000 residents and one civilian support staff per two sworn officers. Additionally, although General Plan Policy PFS-1.14 establishes the City's commitment to ensuring the SPD achieves and maintains optimal response times for all call priority levels, the Sacramento General Plan does not establish a specific response time standard for emergency calls for the SPD.

Development of the proposed project is estimated to result in a total of approximately 4,000 employees. Conservatively estimating that all permanent positions associated with the project would be filled by new residents to the Sacramento region would result in a 0.7 percent increase to the existing City population.²¹ While such an increase could incrementally increase demand for police protection services by the SPD, as previously discussed, in the case *City of Hayward v. Board of Trustees of the California State University*, the First District Court of Appeal affirmed that the focus of CEQA analysis should be limited to physical environmental impacts related to a project.²² As such, as established by the CEQA Guidelines, the incremental increase in demand for SPD police protection services generated by the proposed project would not, by itself alone, constitute an impact on the environment. Furthermore, given the relatively short distance of the Central Command Richards Police Facility to the project site, the SPD

²¹ Based on 2019 population total for the City of Sacramento presented in the Land Use and Planning/Population and Housing chapter of this EIR.

²² First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. (November 30, 2015) 242 Cal.App.4th 833.



would be able to capably respond to service calls from the project site. In addition, General Plan Policies PFS-1.14, -1.15, and -1.16 establish the City's commitment to ensuring the SPD has the necessary levels of facilities, equipment, and staffing to adequately provide police protection services to the SPD service area. Accordingly, revenues generated through payment of applicable permit application fees by the proposed project, as well as development impact fees established pursuant to Sacramento City Code Section 18.24.050, would ensure the project pays a fair share for police protection services provided by the SPD.

Finally, the development standards established by Sacramento City Code Section 17.220.250 for the Industrial PUD (M-1-PUD) and Industrial (M-1) zoning districts require compliance with the City's wall, fence, and gate regulations, which are set forth in Sacramento City Code Chapter 17.620. The aforementioned regulations allow for enhanced fencing materials capable of providing additional security for nonresidential structures and requirements for gated entrances. Such features would reduce the demand for police protection services associated with the proposed project. Thus, any increase in demand generated by the project, including new residents indirectly attracted to the City by the project, would not result in the need for new or physically altered SPD facilities to meet response times or other performance objectives, the construction of which could cause environmental impacts.

Based on the above, development of the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection services and/or facilities, the construction of which could cause significant environmental impacts, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.11-3 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools. Based on the analysis below, the impact is less than significant.

The project site is within the boundaries of the NUSD. The following discussion applies to the potential for the proposed industrial park and the nonparticipating parcels to result in impacts related to the provision of school services and/or facilities provided by the NUSD. Given that the proposed off-site force main would be sized to accommodate flows from the project site, installation of the off-site force main would not indirectly induce population growth such that the NUSD would require new or expansion of existing facilities, the construction of which would result in potential environmental impacts.



Industrial Park and Nonparticipating Parcels

As previously discussed, the proposed project primarily consists of industrial uses, with a limited number of commercial uses also proposed. Thus, the project would not be anticipated to generate a substantial amount of new school-aged population within the NUSD boundaries, as the project does not include new residential units and the majority of jobs created by the project would be filled primarily by those already residing within the Sacramento region. Nonetheless, as previously discussed, conservatively estimating that all permanent positions associated with the project would be filled by new residents to the Sacramento region would result in a 0.7 percent increase to the existing City population. While such an increase could incrementally increase demand for school services by the NUSD, the current NUSD enrollment is 16,598 and the current capacity is 18,344 students, including charter schools.²³ Therefore, the proposed project would not be expected to substantially increase demand for school services provided by the NUSD, such that the project would necessitate new or expansion of existing facilities, the construction of which would cause environmental impacts.

In addition, pursuant to Government Code Section 65996(b), Proposition 1A/SB 50 prohibits local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act involving the planning, use, or development of real property.” Satisfaction of the Proposition 1A/SB 50 statutory requirements by a developer is deemed to be “full and complete mitigation.” Therefore, according to SB 50, the payment of the necessary school impact fees for the proposed project would be full and satisfactory CEQA mitigation. Currently, the NUSD development impact fee rate is \$4.79 per sf of new residential development, and \$0.78 per sf of new commercial/industrial development. The proposed project would be required to pay the NUSD development impact fee, as part of obtaining necessary permits during the project approval process.

Based on the above, through payment of the NUSD development impact fees, the proposed project would not result in the need for new or altered services related to schools, the construction of which would result in substantial environmental impacts, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.11-4 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for parks or other government services; or result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical

²³ Mellor, Jennifer, Facilities & Strategic Planning Director. Personal Communication [email] with Joseph Baucum, Senior Associate, Raney Planning & Management, Inc. June 29, 2023.



deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Based on the analysis below, the impact is *less than significant*.

The following discussion applies to the potential for the proposed industrial park and the nonparticipating parcels to result in impacts related to the provision of park and other public facilities. In general, park facilities that could be potentially impacted by the proposed project would only be those provided by the City of Sacramento through the YPCE Department, and the only other public facilities beyond those associated with the SFD, SPD, NUSD, and YPCE would be library services and/or facilities provided the SPL. Given that the proposed off-site force main would be sized to accommodate flows from the project site, installation of the off-site force main would not indirectly induce population growth such that the City of Sacramento and/or the SPL would require new or expansion of existing facilities, the construction of which would result in potential environmental impacts.

Industrial Park and Nonparticipating Parcels

As previously discussed, the proposed project primarily consists of industrial uses, with a limited number of commercial uses also proposed. Thus, the project would not be anticipated to generate a substantial amount of new population within the City of Sacramento, as the project does not include new residential units and the majority of jobs created by the project would be filled primarily by those already residing within the region. In addition, as detailed in the City of Sacramento Park Impact Fee Nexus Study Update, non-residential development employees are expected to use park facilities at a lesser rate than residents. For example, within the areas outside of the Central City or a Housing Incentive Zone, workers are not expected to use neighborhood parks (which are typically designed to serve local residents only). Rather, employees are expected to use community and citywide parks and facilities, but at approximately 20 percent of the usage exhibited by local residents.²⁴

Based on the above, the proposed project is not expected to substantially increase demand for park or library services provided, respectively, by the YPCE Department and the SPL. Similarly, the proposed project would not be anticipated to result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of a recreational facility would occur or be accelerated. Finally, the proposed project does not include parks or recreational facilities, nor would require the construction or expansion of such facilities.

In addition, in accordance with Sacramento City Code Section 18.56.230, the proposed project would be subject to payment of the City's Park Development Impact Fee prior to issuance of a building permit. Revenues generated through the project's payment of the Park Development Impact Fee would ensure the project contributes a fair share to the construction or expansion of any new park facilities deemed necessary

²⁴ City of Sacramento. *City of Sacramento Park Impact Fee Nexus Study Update*. October 12, 2016.



by the City, which would be required to be constructed in accordance with applicable policies, regulations, and standards to avoid environmental impacts.

Finally, 16 new libraries are planned for construction in the City and County of Sacramento by 2025. Based on plans set forth in the SPL Authority Facility Master Plan, the SPL already expects to provide 1,007,274 sf of library space throughout the SPL's service area by 2025. Thus, any new residents within the Sacramento region indirectly induced by the proposed project's permanent employment positions would reasonably be assumed to not result in the need for new or physically altered SPL facilities to meet performance objectives.

Based on the above, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park or library services and/or facilities, the construction of which could cause significant environmental impacts, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.11-5 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. Based on the analysis below, the impact is less than significant.

The following discussions apply to the potential for development of the proposed industrial park and nonparticipating parcels require the relocation or construction of new utility infrastructure, the construction or relocation of which could cause significant environmental effects. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

Individual discussions on the water, wastewater treatment, electric power, natural gas, and telecommunications facilities improvements that would be necessary to serve the project site are provided below.

Water Supply Infrastructure

As previously discussed, the City of Sacramento operates and maintains a 30-inch water transmission main in Bayou Way that terminates near the eastern boundary of the project site (see Figure 4.11-2). The transmission main was originally constructed to "wheel" the City's water through the County of Sacramento to nearby development areas, including the Sacramento International Airport and Metro Air Park, both located north of the project site, across I-5.



As shown in Figure 4.11-3, from the City's existing 30-inch water transmission main in Bayou Way at the northeast corner of the project site, a new 12-inch water line would be extended towards the south along the site's eastern boundary within "A" Drive. From the "A" Drive/Airport South Industrial Drive intersection, the new 12-inch line would then extend westward into the project site and form a looped water system within Airport South Industrial Drive and the site's western and northern property lines. In total, the new on-site water infrastructure would connect to the City's existing 30-inch transmission main at three points. In addition, the new on-site water distribution system would connect to existing an eight-inch water line at the southeast corner of the project site at Lanfranco Circle, which serves the Westlake subdivision to the east of the site.

It should be noted that as part of the proposed project, ownership and maintenance of 4700 linear feet of the existing 30-inch SCWA transmission main along the northern boundary of Parcel 5 would be transferred to the City of Sacramento. The transfer of the 30-inch water transmission main to the City from SCWA would require reimbursement to the County for the depreciated value of the transmission main. During plan review, additional discussion between the County, City, Sacramento International Airport, and the project applicant would be required regarding the matter. If an agreement is not reached and the transfer of ownership of the 30-inch water transmission main does not occur, a revised design of the water system for the proposed project would be required.

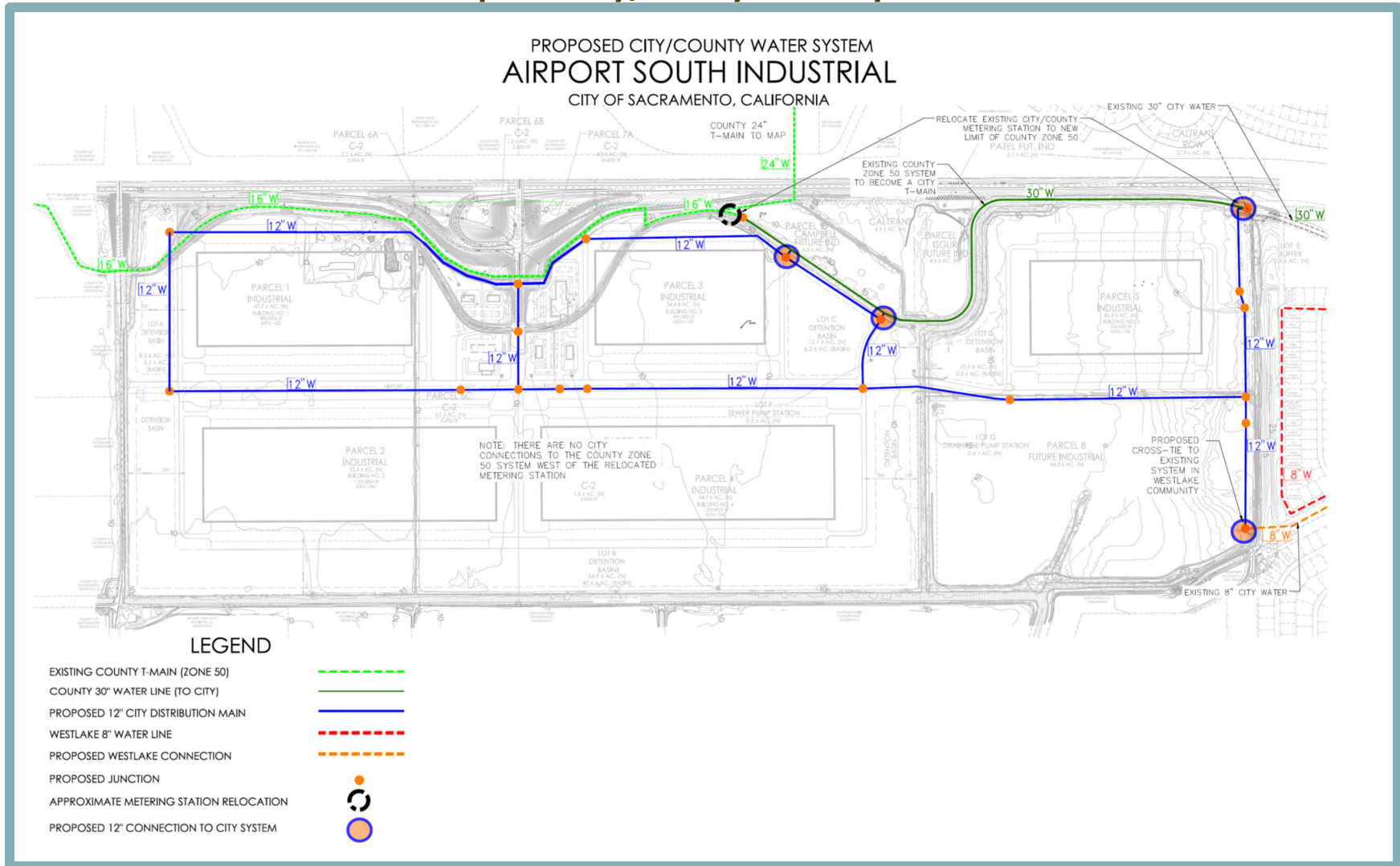
Installation of the new water supply infrastructure, including new fire water lines and hydrants, would occur either in existing road ROWs or in areas proposed for disturbance as part of development of the proposed project. All potential physical environmental impacts that could result from development of the proposed project, including the new water distribution infrastructure, have been evaluated throughout the technical chapters of this EIR. In addition, the new water infrastructure would be designed and constructed in accordance with the applicable standards set forth in Section 27 of the City of Sacramento Standard Specifications, ensuring the new water lines are constructed in conformance with proper materials and sizing. All necessary water conveyance infrastructure for the proposed project would be financed by the project applicant. Furthermore, based on the analysis presented under Impact 4.11-6 below, sufficient water supplies exist to serve the proposed project.

Finally, the Sacramento City Council adopted Resolutions 2023-0338 and 2023-0368, respectively, to adjust the Water Development Fee, Sewer Development Fee, and Combined Sewer Development Fee, as well as establish the Drainage Development Fee, to align with the City's updated Nexus Studies. The aforementioned resolutions provide for an effective date for the new utility development fees of January 22, 2024. The proposed project would be subject to the utility development fees in effect at the time of building permit application submittal.

Based on the above, development of the proposed project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects, and a less-than-significant impact would occur.



**Figure 4.11-3
 Proposed City/County Water System**



Wastewater Infrastructure

As previously discussed, an existing SacSewer trunk line is located within Greg Thatch Circle, to the east of SR 99. From the existing trunk line, flows are conveyed to the 48-inch SacSewer North Natomas interceptor line, which connects with the trunk line to the southeast of the Club Center Drive/Hampton Falls Way intersection and proceeds south of Del Paso Road within East Commerce Way. As detailed in the Project Description chapter of this EIR, sanitary sewer conveyance service within the project site would be provided through a gravity system. As shown in Figure 4.11-4, new eight-inch sewer lines would be installed within the project site's parcels, which would convey flows to a new sewer line in Airport South Industrial Drive ranging in diameter between 12 and 18 inches.

From the sewer line in Airport South Industrial Drive, flows would be directed to a new pump station sited within Lot F. From the new pump station, flows would be conveyed to the existing SacSewer North Natomas interceptor line by way of a force main that would extend from the northeast corner of the site and proceed towards the south within Bayou Way and El Centro Road. At the El Centro Road/Del Paso Road intersection, the off-site force main would connect to the North Natomas interceptor line through one of three optional alignments.

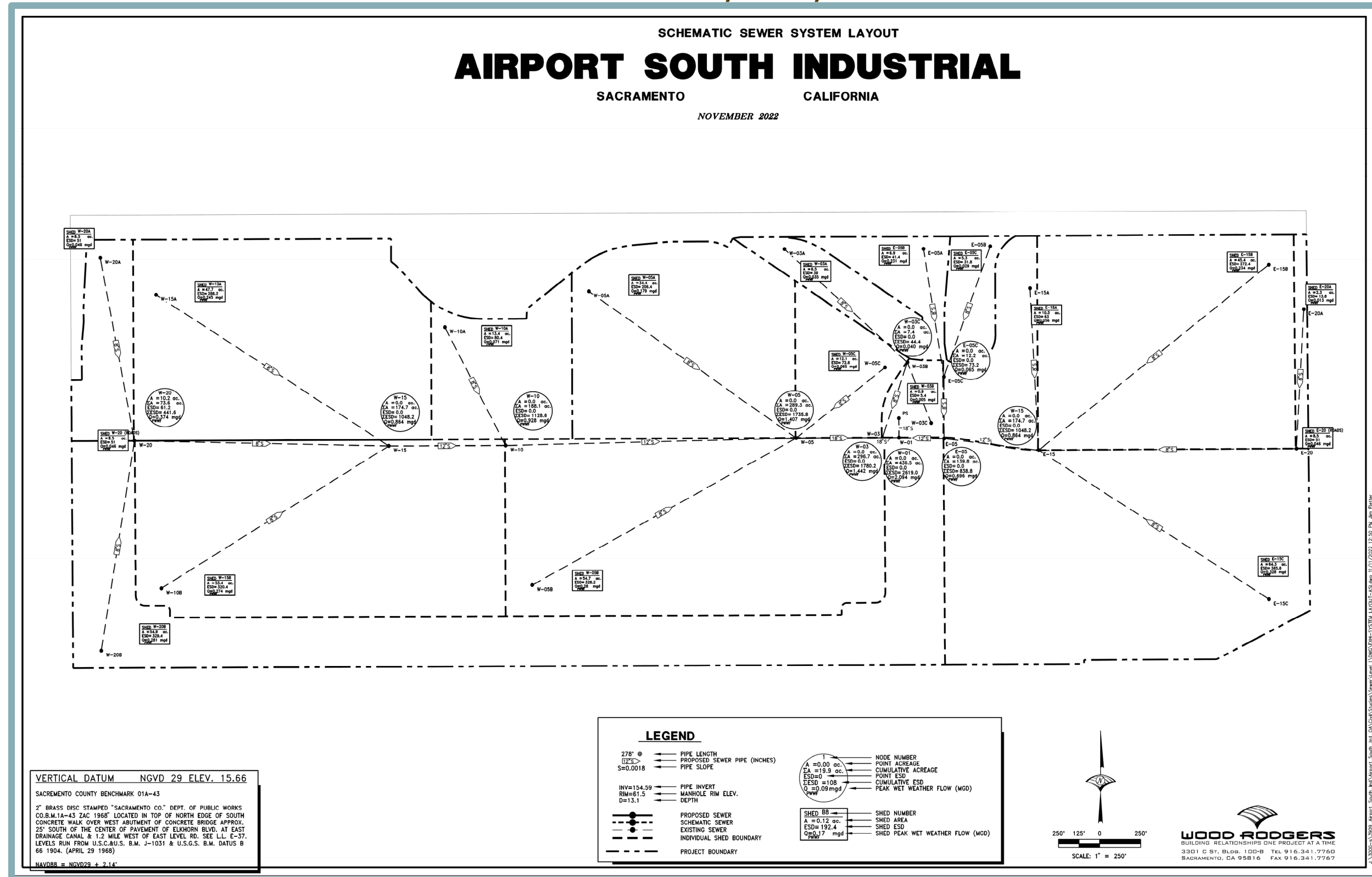
As shown in Figure 3-4 of the Project Description chapter of this EIR, each option would require the force main to proceed east. Option 1 would include installation of the force main within a City highway buffer parallel with the westerly side of I-5. About 0.5-mile south of Del Paso Road, the force main would cross under I-5 within City ROW and then discharge into the North Natomas interceptor line within East Commerce Way. Options 2 and 3 would route the force main either north or south of the I-5 on/off ramps, cross under I-5, and then proceed within Del Paso Road towards East Commerce Way in existing ROW and/or previously disturbed areas.

All potential physical environmental impacts that could result from development of the proposed project, including new on- and off-site sewer infrastructure, have been evaluated throughout the technical chapters of this EIR. In addition, the new sewer infrastructure would be designed and constructed in accordance with the applicable standards set forth in the SacSewer Standards and Specifications, ensuring the new sewer lines and pump station are constructed in conformance with proper materials and sizing. All necessary sewer conveyance infrastructure for the proposed project would be financed by the project applicant. Furthermore, based on the analysis presented under Impact 4.11-7 below, sufficient capacity exists at the SRWTP to serve the proposed project.

Based on the above, development of the proposed project would not require or result in the relocation or construction of new or expanded sewer facilities, the construction or relocation of which could cause significant environmental effects, and a less-than-significant impact would occur.



Figure 4.11-4
 Schematic Sewer System Layout



Electricity, Natural Gas, and Telecommunications Infrastructure

The proposed project would include new connections to existing underground electricity, natural gas, and telecommunications infrastructure located in the project vicinity within I-5 and Power Line Road. Installation of the new electricity, natural gas, and telecommunications infrastructure would occur either in areas that have been previously disturbed or in areas proposed for disturbance as part of development of the proposed project. Consistent with the provisions set forth in Sacramento City Code Section 12.12.260, new electricity, natural gas, and telecommunications infrastructure would be required to be installed underground.

Based on the above, development of proposed project would not require or result in the relocation or construction of new or expanded electricity, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and a less-than-significant impact would occur.

Conclusion

Based on the above, development of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater, electricity, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.11-6 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Based on the analysis below, the impact is less than significant.

The Targeted MSR evaluated total buildout of the project site in accordance with the proposed land uses. Thus, the following discussion applies to the potential for the City to have sufficient water supplies available to serve the proposed industrial park and the nonparticipating parcels, as well as reasonably foreseeable future development during normal, dry, and multiple dry years. The proposed off-site force main would not generate water demand. As such, the proposed off-site force main would not result in potential impacts related to water supplies.

Industrial Park and Nonparticipating Parcels

The City's 2020 UWMP includes a water service reliability assessment of the City's projected supplies and demands during normal, single dry, and five consecutive dry years. Under the various water year types, the total annual water supply sources available are compared to the total annual projected water use for the City's water service area from 2025 to 2045 in five-year increments.

As previously discussed, Table 4.11-1 above summarizes the supply and demand of each water year type provided in the 2020 UWMP. As shown above, the City is projected to have a surplus of water supplies in all water year types through 2045.



With respect to the demand anticipated to be generated by the proposed project, the Targeted MSR incorporates results from the modeling conducted as part of the Preliminary Water Study to estimate the project’s water demands, which are summarized in Table 4.11-5.

| Table 4.11-5 Proposed Project Water Demand Summary | | | |
|---|--------------|------------------------------|---------------|
| Land Use | Acres | ADD Unit Water Demand | |
| | | AFY/Acre | AFY |
| Commercial | 13.4 | 2 | 26.8 |
| Industrial | 235.6 | 0.9 | 212.04 |
| Nonparticipating | 83 | 0.9 | 74.7 |
| Total | 332 | -- | 313.54 |

Source: Wood Rodgers, 2023.

Based on the data presented in Table 4.11-5, the Targeted MSR determined that the total average daily demand for the proposed project would be 313.54 AFY. As shown in Table 4.11-1, the City is anticipated to have a surplus of water supplies in all hydrologic conditions through 2045, and the lowest projected surplus is expected to be 198,436 AFY in 2045 during the fifth consecutive year of drought. Therefore, given the substantial amount of surplus projected for the City’s water supplies in all hydrologic conditions, the City’s existing water supplies would be able to accommodate the demand anticipated to be generated by the City’s existing commitments, as well as the water demand projected for the proposed project.

Based on the above, the City would have sufficient water supplies available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years, and a **less-than-significant** impact would occur.

Mitigation Measure(s)
 None required.

4.11-7 Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments. Based on the analysis below, the impact is less than significant.

The Targeted MSR evaluated total buildout of the project site in accordance with the proposed land uses. Thus, the following discussion applies to the potential for the proposed industrial park and the nonparticipating parcels to generate wastewater flows in excess of the SRWTP’s existing capacity. The proposed off-site force main would not generate wastewater flows. Instead, the off-site force main would serve to convey wastewater flows from the project site to the SRWTP. As such, the proposed off-site force main would not result in potential impacts related to wastewater treatment.



Industrial Park and Nonparticipating Parcels

Based on the Preliminary Site Plan (see Figure 3-3 in the Project Description chapter of this EIR), the Sewer Study estimates that the proposed project's total sewer demand would be 2,619 ESDs (see Table 4.11-4). Based on the ESDs, the Targeted MSR found that the project's cumulative ADWF and PWWF demand is estimated to be 0.81 mgd and 2.09 mgd, respectively. It should be noted that the proposed on-site sewer pump station would be designed to meet the ultimate PWWF.

According to the Targeted MSR, the SRWTP is permitted to treat ADWF of 181 mgd. Since the opening of the SRWTP, system improvements have been made to accommodate regional growth and to add capacity to SacSewer's interceptor system. In 2014, the SRWTP's ADWF was approximately 141 mgd. Although future growth in the SacSewer service area will increase demands for wastewater service and use the remaining capacity of the SRWTP, regional water conservation efforts have resulted in a reduction in water use, which has in turn, increased the available capacity at the SRWTP. For instance, SacSewer anticipates per capita water consumption to decline through the continued installation of water meters and water conservation measures. As such, a substantial amount of additional water conservation is expected throughout SacSewer's service area, and the wastewater treatment provider expects the existing 181 mgd ADWF capacity to be sufficient through 2050. Accordingly, the Targeted MSR concludes that the SRWTP would maintain sufficient capacity to treat wastewater flows generated by the proposed project, in addition to the provider's existing commitments.

Based on the above, the proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate wastewater treatment capacity to serve the project's projected demand in addition to the provider's existing commitments. Therefore, a ***less-than-significant*** impact would occur.

Mitigation Measure(s)

None required.

4.11-8 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, or conflict with federal, State, and local management and reduction statutes and regulations related to solid waste. Based on the analysis below, the impact is *less than significant*.

Solid waste generated as part of construction and operation of the project site would be disposed of at the Kiefer Landfill. Thus, the following discussion applies to the potential for the proposed industrial park and the nonparticipating parcels to result in impacts related to solid waste disposal. In addition, the analysis includes evaluation of the proposed off-site improvements.



Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

As previously discussed, solid waste from the City is disposed of at the SRTS, NARS, Sacramento County Kiefer Landfill, as well as other facilities, including the Yolo County Central Landfill, L and D Landfill, the Florin Perkins Public Disposal Site, and the Elder Creek Transfer Station. The Kiefer Landfill is the primary location for the City of Sacramento's disposal of solid waste. The waste delivered to the landfill is from municipal and industrial sources, with an average of approximately 6,300 tons per day accepted. According to CalRecycle, the Kiefer Landfill is permitted to accept a maximum of 117,400,000 cubic yards of waste.²⁵ The landfill has a remaining capacity of 112,900,000 cubic yards and is anticipated to cease operations by 2064.

Overall, following development of project site, the proposed project would result in a maximum building square footage of 6,707,500 sf. According to the U.S. Environmental Protection Agency (USEPA) report, *Estimating 2003 Building-Related Construction and Demolition Materials Amounts*, non-residential construction activities generate an average of 4.34 pounds per square foot (lbs/sf) of waste.²⁶ Therefore, applying such an amount to buildout of the proposed project would produce approximately 29,110,550 lbs (14,555.3 tons) of construction waste (4.34 lbs/sf X 6,707,500 sf).

The construction waste estimate presented above represents a conservative analysis of the maximum potential waste production from construction of the proposed project. The CALGreen Code requires at least 65 percent diversion of construction waste for projects permitted after January 1, 2017. As such, a minimum of 9,460.9 tons of waste would be diverted away from landfill disposal during construction. Considering the applicable CALGreen Code requirements, buildout of the proposed project would be anticipated to produce up to 5,094.4 tons of waste during construction. In addition, construction waste would be generated as part of installation of the proposed off-site force main. Construction waste generation represents a short-term increase in waste generation. Considering that the Kiefer Landfill has a remaining capacity of 96.1 percent of the total permitted capacity of the landfill, the proposed project's construction waste would represent only an incremental contribution to the waste received at the landfill, and a less-than-significant impact would occur.

Operational solid waste generation from the proposed project has been estimated based on an average waste generation rate for employees of industrial uses, as published by CalRecycle.²⁷ The total number of employees would produce approximately 35,720 lbs/day (17.86 tons/day) of operational solid waste. The Kiefer Landfill has a permitted throughput of 10,815 tons/day. Considering that the landfill currently accepts 6,300 tons/day, the landfill would be able to accommodate the operational waste generated by the proposed project. In addition, considering that the

²⁵ California Department of Resources Recycling and Recovery. *SWIS Facility/Site Activity Details Sacramento County Landfill (Kiefer) (34-AA-0001)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2070?siteID=2507>. Accessed August 2023.

²⁶ U.S. Environmental Protection Agency. *Estimating 2003 Building-Related Construction and Demolition Materials Amounts*. 2009.

²⁷ California Department of Resources Recycling and Recovery. *Estimated Solid Waste Generation Rates*. Available at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed June 2023.



Kiefer Landfill has a remaining capacity of 96.1 percent, the proposed project's operational waste would represent only an incremental contribution to the waste received at the landfill.

Based on the above, the proposed project would not 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. In addition, the project would not conflict with applicable federal, State, and local management and reduction statutes and regulations related to solid waste. Thus, a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, "cumulative impacts" refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

The cumulative setting for impacts related to public services and utilities encompasses buildout of the applicable service areas of public service and utility providers discussed in this chapter. Additional detail regarding the cumulative project setting can be found in Chapter 6, Statutorily Required Sections, of this EIR.

4.11-9 Cumulative impacts to public services. Based on the analysis below, the cumulative impact is less than significant.

The following discussion provides an analysis of potential cumulative impacts related to public services associated with development of the proposed industrial parks, nonparticipating parcels, and development within the City of Sacramento 2040 General Plan policy area. Given that the proposed off-site force main would be sized to accommodate flows from the project site, installation of the off-site force main would not indirectly induce population growth such that new or expansion of existing public facilities would be required, the construction of which would result in potential environmental impacts.

Industrial Park and Nonparticipating Parcels

Potential cumulative impacts related to fire and police protection services, schools, public services and government facilities, and parks and recreation are discussed below.

Fire Protection Services

Cumulative development, in conjunction with the proposed project, would increase the demand for fire protection services provided by the SFD. As discussed above, the SFD



seeks to respond to fire incidents and medical emergencies within four minutes, consistent with General Plan Policies PFS-1.14, -1.15, and -1.16.

In addition, the foregoing policies establish the City's commitment to ensuring the SFD has the necessary levels of facilities, apparatus, equipment, and staffing. The City funds the SFD budget, in part, through revenues generated from payment of application fees for applicable permits and clearances by new development. In addition, new development within the City is subject to applicable development impact fees to ensure a fair-share contribution is made to finance the purchase of new or expansion of existing SFD facilities, apparatus, and equipment necessary for the purposes of maintaining adequate service levels. Similar to the proposed project, cumulative development within the City's General Plan policy area would be subject to applicable taxes and fees, including, but not limited to, property taxes, franchise taxes, business license taxes, and license and permit fees. Additionally, new residents generated by cumulative development would be subject to local sales taxes. Thus, revenues generated through fee payments associated with cumulative development would pay fair shares toward any new SFD facilities deemed necessary by the City, all of which would be required to be designed and constructed in accordance with applicable regulations and standards, and if necessary, undergo CEQA review.

Finally, as discussed above, through the automatic aid agreement between fire agencies within Sacramento County, the most efficient fire protection and emergency medical services are available to properties throughout the County. All structures included as part of buildout of the adopted General Plan would be constructed consistent with the CBC and CFC. Compliance with the CBC and CFC would reduce the potential for fires to occur within the policy area, which would reduce the demand for fire protection services in the City.

Based on the above, cumulative development within the City of Sacramento, in conjunction with the proposed project, would result in a less-than-significant impact related to the need for new or improved fire protection facilities, the construction of which could cause significant environmental impacts.

Law Enforcement Services

Cumulative development, in conjunction with the proposed project, would increase the demand for law enforcement services provided by the SPD. As discussed above, the SPD does not have an adopted officer-to-resident ratio, but unofficially, the SPD maintains an unofficial goal of 2.0 to 2.5 sworn police officers per 1,000 residents and one civilian support staff per two sworn officers. Additionally, the Sacramento General Plan does not establish a specific response time standard for emergency calls for the SPD.

General Plan Policies PFS-1.14, -1.15, and -1.16 establish the City's commitment to ensuring the SPD has the necessary levels of facilities, equipment, and staffing. Accordingly, revenues generated through payment of applicable permit application fees, as well as development impact fees established pursuant to Sacramento City Code Section 18.24.050, ensure new development pays a fair share for police protection services provided by the SPD. Cumulative development within the General Plan policy area would be subject to applicable permit application and development



impact fees. Additionally, new residents generated by cumulative development would be subject to local sales taxes. Thus, revenues generated through permit application and development impact fee payments associated with cumulative development would pay fair shares toward any new SPD facilities deemed necessary by the City, all of which would be required to be designed and constructed in accordance with applicable regulations and standards, and if necessary, undergo CEQA review.

Based on the above, cumulative development within the City of Sacramento would not result in the need for new or improvements to existing police protection facilities, the construction of which could cause significant environmental impacts, and a less-than-significant impact would occur.

School Facilities

Cumulative development, in conjunction with the proposed project, would increase the demand for school services provided by the NUSD. However, as discussed above, development as part of cumulative buildout of the General Plan policy area would be subject to NUSD development impact fees, which fund the cost of improving and expanding school facilities and equipment needed to accommodate additional student population induced by new development. Payment of the fees would be deemed to be “full and complete mitigation,” as established by Proposition 1A/SB 50. In addition, Measure L, a \$172 million school facilities bond to serve NUSD schools, was approved by voters in November 2018. Funds from Measure L serve to upgrade existing facilities and construct new facilities identified by the NUSD in the 2017 Master Plan Update.

Based on the above, cumulative development within the City of Sacramento would not result in the need for new or improvements to existing school facilities, the construction of which could cause significant environmental impacts, and a less-than-significant impact would occur.

Parks and Other Public Facilities

Cumulative development, in conjunction with the proposed project, would increase the demand for park facilities operated by the City of Sacramento YPCE Department. However, development facilitated by buildout of the General Plan policy area would be subject to the City’s Park Development Impact Fee, in accordance with Sacramento City Code Section 18.56.230. Revenues generated through projects’ payments of the Park Development Impact Fee would pay the projects’ fair shares toward any new park facilities deemed necessary by the City, all of which would be required to be designed and constructed in accordance with applicable regulations and standards, and if necessary, undergo CEQA review. In addition, based on plans set forth in the SPL Authority Facility Master Plan, the SPL already expects to provide 1,007,274 sf of library space throughout the SPL’s service area by 2025. Thus, the increase in demand for library services generated by cumulative development has already been anticipated.

Based on the above, cumulative development within the City of Sacramento, in conjunction with the proposed project, would result in a less-than-significant impact related to the need for new or improved parks and/or other facilities, the construction of which could cause significant environmental impacts.



Conclusion

Based on the above, the proposed project, in combination with future buildout of the General Plan policy area, would result in a ***less-than-significant*** cumulative impact related to public services and recreation.

Mitigation Measure(s)

None required.

4.11-10 Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the Sacramento General Plan. Based on the analysis below, the cumulative impact is *less than significant*.

The following discussion provides an analysis of potential cumulative impacts related to utilities and service systems associated with development of the proposed industrial parks, nonparticipating parcels, the off-site force main, and development within the City of Sacramento General Plan policy area.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

The following discussions provide an analysis of the proposed project's contribution to cumulative impacts associated with water supply, wastewater treatment, dry utilities, and solid waste within the City of Sacramento.

Water Supply

Cumulative development, in conjunction with the proposed project, would result in increased demand for water supplies provided by the City. However, as discussed under Impact 4.11-6 and summarized in Table 4.11-5, the City is anticipated to have ample supply to accommodate demand generated by buildout of the City's General Plan policy area in normal, single dry, and multiple dry years through 2045.

In addition, new water infrastructure required as part of cumulative development within the City would be required to be designed and constructed in compliance with the applicable standards set forth in Section 27 of the City of Sacramento Standard Specifications. Compliance with the foregoing standards would ensure new water lines installed as part of buildout of the City of Sacramento are constructed in conformance with proper materials and sizing.

Based on the above, adequate water supply would be available to serve cumulative development within the City of Sacramento, in conjunction with the proposed project, and a less-than-significant impact would occur.

Wastewater Treatment

Cumulative development, in conjunction with the proposed project, would result in increased demand for wastewater treatment services provided by the SRWTP. According to the Targeted MSR, the SRWTP is permitted to treat ADWF of 181 mgd. However, regional water conservation efforts have resulted in a reduction in water use, which has in turn, increased the available capacity at the SRWTP. For instance,



continued installation of water meters and water conservation measures have reduced water consumption per capita. As such, a substantial amount of additional water conservation is expected throughout SacSewer's service area, and the wastewater treatment provider expects the existing 181 mgd ADWF capacity to be sufficient through 2050.

In addition, new sanitary sewer conveyance infrastructure required as part of cumulative development within the City of Sacramento would be required to be designed and constructed in accordance with the applicable standards set forth in the SacSewer Standards and Specifications. Compliance with the foregoing standards would ensure new sewer lines installed as part of buildout of the General Plan are constructed in conformance with proper materials and sizing.

Based on the above, adequate wastewater treatment services would be available to serve cumulative development within the City of Sacramento, in conjunction with the proposed project, and a less-than-significant impact would occur.

Electricity, Natural Gas, and Telecommunications Facilities

Environmental effects associated with the construction of new or expanded electricity, propane, and telecommunications facilities would primarily be project-specific, rather than cumulative. As noted under Impact 4.11-5, while the project would include new connections to existing electrical, natural gas, and telecommunications infrastructure located in the project vicinity, substantial extension of existing off-site infrastructure would not be required. Therefore, the proposed project would result in a less-than-significant cumulative impact related to construction of new or expanded electricity, natural gas, and telecommunications facilities.

Solid Waste

As noted previously, according to CalRecycle, the Kiefer Landfill has a remaining capacity of 112,900,000 cubic yards and is anticipated to cease operations by 2064. Construction waste generated by development facilitated by buildout of the General Plan policy area would be required to comply with the applicable provisions of the CALGreen Code. The CALGreen Code requires at least 65 percent diversion of construction waste for projects permitted after January 1, 2017. In addition, commercial and residential solid waste collected and processed by the City is sorted at the SRTS, which accepts waste from the southern region of the City, and the NARS, which accepts waste from the north region of the City. Recyclables are separated from the waste to be disposed of at the City's landfills, which further preserves remaining capacity at the Kiefer Landfill. Considering the remaining capacity at the landfill to serve future development, adequate capacity would be available to serve cumulative development within the City of Sacramento, in conjunction with the proposed project, and a less-than-significant impact would occur.

Conclusion

Based on the above, the proposed project, in conjunction with buildout of the General Plan policy area, would not result in any significant cumulative impacts related to increased demand for utilities and service systems within the City of Sacramento. Thus, a **less-than-significant** cumulative impact would occur.



Mitigation Measure(s)
None required.



4.12 TRANSPORTATION

4.12 TRANSPORTATION

4.12.1 INTRODUCTION

The Transportation chapter of the EIR addresses the transportation conditions within the project vicinity, including consideration of proposed project impacts related to pedestrian facilities, bicycle facilities, transit facilities and services, vehicle miles traveled (VMT), and traffic safety issues. The information contained within this chapter is primarily based on a Traffic Impact Analysis,¹ Trip Generation and Distribution Memo,² and VMT Analysis Memo³ prepared for the proposed project by DKS (see Appendix N through Appendix P of this EIR), as well as a VMT Mitigation Memorandum prepared by the City's Public Works Department (see Appendix Q).⁴ Additional information was sourced from the City of Sacramento 2040 General Plan,⁵ and the City of Sacramento 2040 Master EIR (MEIR).⁶

4.12.2 EXISTING ENVIRONMENTAL SETTING

The section below describes the physical and operational characteristics of the existing transportation system within the project area, including the surrounding roadway network, transit, bicycle, and pedestrian facilities.

Existing Roadways

The following sections provide a summary of the existing roadways within the project area.

Interstate 5

Interstate 5 (I-5) is a north-south freeway facility serving local and interregional traffic within the Sacramento region. I-5 primarily links South Sacramento, the Central Business District in Downtown Sacramento, Natomas, and the Sacramento International Airport. I-5 is also used as a primary route for long-distance traffic, including truck traffic. I-5 is generally about two to four lanes in each direction in the project vicinity.

Power Line Road

Power Line Road is a north-south minor collector, perpendicular to I-5, located along the west side of the project site. To the north, the roadway intersects with Bayou Way and passes over I-5. To the south, Power Line Road intersects with Del Paso Road and ends at Garden Highway. Power Line Road has one lane in each direction with narrow, unpaved shoulders.

¹ DKS. *Sacramento Airport South Industrial Development Traffic Impact Analysis*. June 5, 2023.

² DKS. *Trip Generation and Distribution Memorandum*. March 10, 2023.

³ DKS. *VMT Analysis Memorandum*. March 10, 2023.

⁴ City of Sacramento Department of Public Works. *P21-017 Airport South Industrial - VMT Mitigation Measures*. September 5, 2023.

⁵ City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

⁶ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



Bayou Way

Bayou Way is an east-west local rural road located on the north side of the project site. To the west, the roadway intersects with Power Line Road. To the east, Bayou Way intersects with Metro Air Parkway and continues to the Westlake neighborhood, where the roadway becomes El Centro Road. Bayou Way has one lane in each direction. East of the project site, El Centro Road is separated by a painted median and has painted bike lanes in both directions.

Del Paso Road

Del Paso Road is an east-west minor arterial located approximately 0.5-mile south of the project site. To the west, the roadway intersects with Power Line Road. To the east, Del Paso Road intersects Hovnanian Drive and bisects the suburban Westlake and Sundance Lake neighborhoods. To the east, the roadway is a major arterial and has ramps connected to I-5. The segment of the roadway directly to the south of the project site has one lane in each direction. To the east, the roadway expands to three lanes in each direction with additional left turn lanes and a raised median.

El Centro Road

El Centro Road is a north-south arterial located approximately 0.5-mile east of the project site. El Centro Road is a planned four-lane minor arterial. To the north, the roadway becomes a two-lane facility to Bayou Way. To the south, the roadway intersects with Del Paso Road and runs alongside the suburban neighborhoods of Westlake and Sundance Lake. North of Del Paso Road, the roadway has two southbound lanes, one northbound lane, and a raised median with left turn lanes. To the south of Del Paso Road, the roadway has two lanes in each direction with a raised median.

Metro Air Parkway

Metro Air Parkway is a north-south arterial perpendicular to I-5 that bisects the project site. Metro Air Parkway intersects Bayou Way to the south, passes over I-5, and continues north to intersect with West Elkhorn Boulevard. Within the project area, Metro Air Parkway currently has one lane per direction and is being widened to have two lanes in each direction. In the future, the roadway is anticipated to be widened to three lanes in each direction. Metro Air Parkway is considered a thoroughfare within the County.

Elkhorn Boulevard

Elkhorn Boulevard is an east-west major arterial located north of the project site. To the east, Elkhorn Boulevard connects with State Route (SR) 99. To the west, Elkhorn Boulevard connects with Power Line Road. Elkhorn Boulevard is currently one lane per direction except in front of Northlake, where the roadway has three eastbound lanes and two westbound lanes. Elkhorn Boulevard is anticipated to be widened as a six-lane major arterial/thoroughfare.

Pedestrian, Bicycle and Transit Facilities

The sections below describe the existing pedestrian, bicycle and transit facilities located within the vicinity of the project site.

Pedestrian Facilities

The pedestrian system in the project site vicinity consists of sidewalks along Del Paso Road and El Centro Road as the roadways pass through the Sundance Lake and Westlake neighborhoods, as well as an internal trail system within the neighborhoods. In addition, a sidewalk is located along Bayou Way just east of the project site, associated with the existing self-storage facility.



Pedestrian facilities are not currently located along the project site frontage, as the location is currently undeveloped.

Bicycle Facilities

The City of Sacramento includes the following bicycle system classifications:

- **Bicycle paths** (Class I) provide a completely separate right-of-way (ROW) and are designated for the exclusive use of bicycles and pedestrians, with vehicle cross-flow minimized.
- **Bicycle lanes** (Class II) provide a restricted ROW and are designated for the use of bicycles for one-way travel with a striped lane on a street or highway. Bicycle lanes are generally a minimum of five feet wide. Vehicle parking and vehicle/pedestrian cross-flow are permitted.
- **Bicycle routes** (Class III) provide a ROW designated by signs or pavement markings for shared use with motor vehicles. These include “sharrows” or shared-lane markings to highlight the presence of bicyclists.
- **Bikeways** (Class IV) are cycle tracks or “separated” bikeways that provide a ROW designated exclusively for bicycle travel within a roadway and are protected from other vehicle traffic by physical barriers, including, but not limited to grade separation, flexible posts, inflexible vertical barriers such as raised curbs, or parked cars.

The bicycle system in the site vicinity consists of infrastructure around the Westlake and Sundance Lake neighborhoods. The bicycle system consists of a Class I bike path and Class II bike lanes to the south and east of the project site. Figure 4.12-1 illustrates the existing bicycle system in the project vicinity.

Transit System

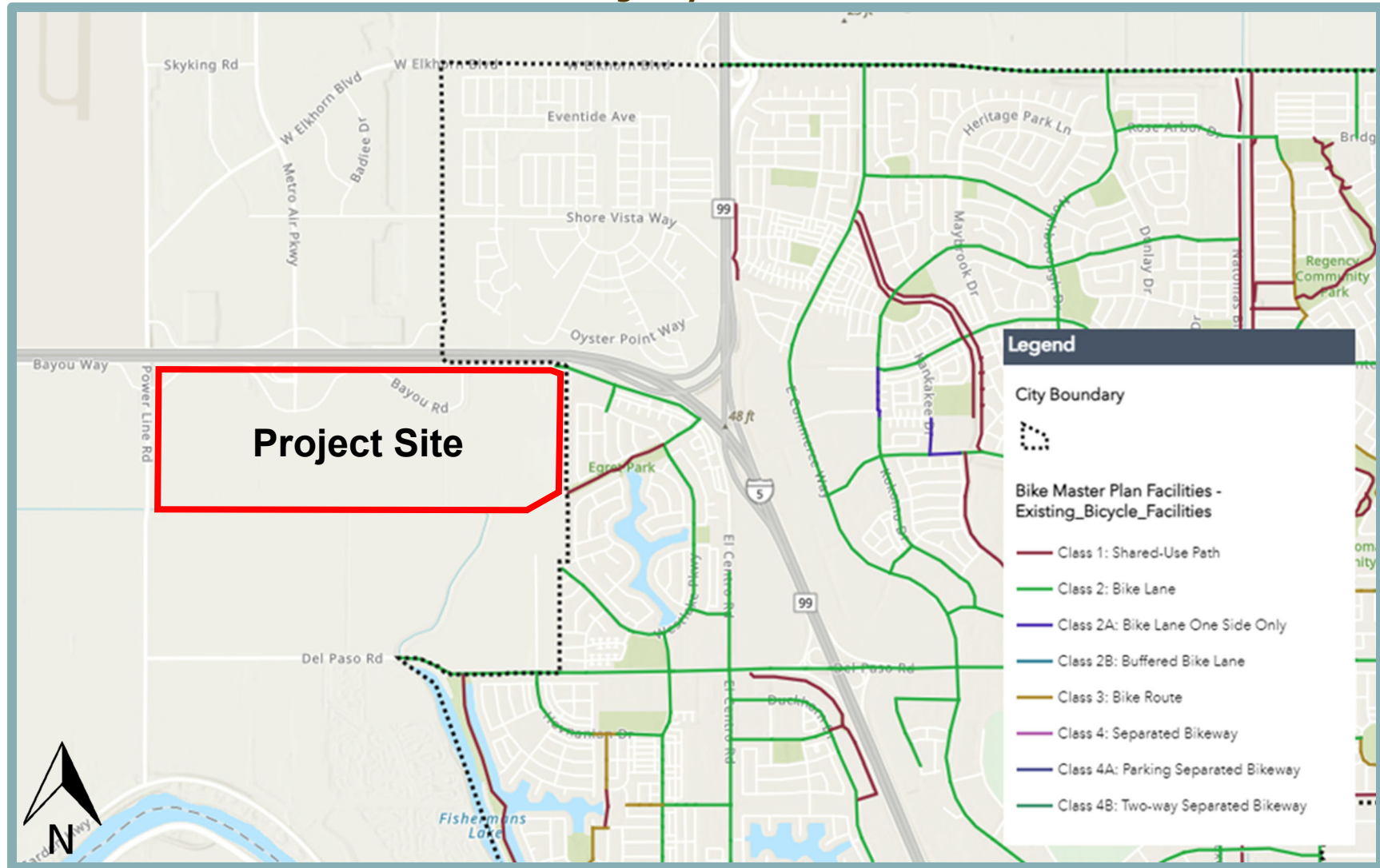
The project area is served by the local Sacramento Regional Transit (SacRT) bus service (Routes 13 and 142) as well as North Natomas Jibe (Lines 171 and 174), as illustrated in Figure 4.12-2. SacRT Bus Route 13 operates along Del Paso Road, south of the project site, and SacRT Bus Route 142, which is a peak-only line, operates along I-5 and stops north of the project site. North Natomas Jibe Line 171 passes along the project site on Callison Drive, and North Natomas Jibe Line 174 operates on Del Paso Road southeast of the project site. However, Jibe Line 174 does not include any stops in the vicinity of the site.

Jibe routes have traditionally ran from Natomas to Downtown during the morning peak hour and from Downtown to Natomas during the afternoon peak hour. However, it should be noted that, due to continued low ridership caused by the COVID19 pandemic, the North Natomas Jibe has suspended all service.

It should also be noted that while the project site is not currently served by SacRT Light Rail Transit (LRT), as outlined in the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), a future SacRT LRT Green Line station is planned within 0.5-mile of the project boundary at Elkhorn Blvd and Power Line Road.



**Figure 4.12-1
Existing Bicycle Network**



**Figure 4.12-2
Existing Transit Network**



Vehicle Miles Traveled

VMT is a measure of the total amount of vehicle travel occurring on a given roadway system. VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. For analysis purposes, VMT refers to automobile VMT, specifically passenger vehicles and light trucks; heavy truck traffic is typically excluded. VMT does not directly measure traffic operations; instead, VMT is a measure of transportation network use and efficiency, especially when expressed as a function of population (i.e., VMT per capita).

As a result of Senate Bill (SB) 743, passed in 2013, local jurisdictions may not rely on vehicle level of service (LOS) and similar measures related to delay as the basis for determining the significance of transportation impacts under CEQA. Thus, consistent with the CEQA Guidelines, VMT is the primary metric used to identify transportation impacts to roadway systems within this chapter. The City of Sacramento currently uses VMT procedures and standards consistent with technical guidance published by the Governor's Office of Planning and Research (OPR). The City of Sacramento has an average VMT per employee of 17.33.

4.12.3 REGULATORY CONTEXT

Existing transportation policies, laws, and regulations that would apply to the proposed project are summarized below and provide a context for the impact discussion related to the project's consistency with the applicable regulatory conditions. Federal plans, policies, regulations, or laws related to transportation and circulation are not directly applicable to the proposed project. Rather, the analysis presented herein focuses on State and local regulations, which govern the regulatory environment related to transportation and circulation at the project level.

State Regulations

The following are the regulations pertinent to the proposed project at the State level, organized chronologically.

Senate Bill 743

In 2013, SB 743 was passed to amend Sections 65088.1 and 65088.4 of the Government Code, amend Sections 21181, 21183, 21186, 21187, 21189.1, and 21189.3 of the Public Resources Code (PRC), to add Section 21155.4 to the PRC, to add Chapter 2.7 (commencing with Section 21099) to Division 13 of the PRC, to add and repeal Section 21168.6.6 of the PRC, and to repeal and add Section 21185 of the PRC, relating to environmental quality. In response to SB 743, OPR has updated the CEQA Guidelines to include new transportation-related evaluation metrics. In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package along with an updated Technical Advisory related to Evaluating Transportation Impacts in CEQA. Full compliance with the Guidelines became effective July 2020. As a result of SB 743, and Section 15064.3 of the CEQA Guidelines, as discussed in further detail below, local jurisdictions may no longer rely on vehicle LOS and similar measures related to delay as the basis for determining the significance of transportation impacts under CEQA, and instead a VMT metric should be evaluated.

Technical Advisory on Evaluating Transportation Impacts in CEQA

In December of 2018, the OPR published the Technical Advisory on Evaluation Transportation Impacts in CEQA (Technical Advisory), which is a guidance document to provide advice and recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The Technical Advisory is intended to be a resource for the public to use at their discretion, and the OPR does not enforce any part of the recommendations contained therein.



The Technical Advisory includes recommendations regarding methodology, screening thresholds, and recommended thresholds per land use type.

Vehicle Miles Traveled-Focused Transportation Impact Study Guide

In May of 2020, the California Department of Transportation (Caltrans) adopted the Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG) to provide direction to lead agencies regarding compliance with SB 743. The TISG replaces the Caltrans' 2002 Guide for the Preparation of Traffic Impact Studies and is for use with local land use projects, not for transportation projects on the State Highway System. The objectives of the TISG are to provide:⁷

- a) Guidance in determining when a lead agency for a land use project or plan should analyze possible impacts to the State Highway System, including its users.
- b) An update to the Guide for the Preparation of Traffic Impact Studies (Caltrans, 2002) that is consistent with SB 743 and the CEQA Guidelines adopted on December 28, 2018.
- c) Guidance for Caltrans land use review that supports state land use goals, state planning priorities, and GHG emission reduction goals.
- d) Statewide consistency in identifying land use projects' possible transportation impacts, to the State Highway System, and to identify potential non-capacity increasing mitigation measures.
- e) Recommendations for early coordination during the planning phase of a land use project to reduce the time, cost, and/or frequency of preparing a Transportation Impact Study or other indicated analysis.

Caltrans has jurisdiction over State highways. Therefore, Caltrans controls all construction, modification, and maintenance of State highways, and any improvements to such roadways require Caltrans approval.

Traffic Safety Bulletin 20-02-R1: Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance

In December 2020, Caltrans released Traffic Safety Bulletin 20-02-R1: Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance (Traffic Safety Guidance). The purpose of the Caltrans Traffic Safety Guidance is to provide instructions to Caltrans personnel, lead agencies, developers, and consultants conducting safety reviews for proposed land use projects and plans affecting the State Highway System. The Guidance establishes the safety impact review expectations for Caltrans and lead agencies to comply with CEQA, and is intended to be used by lead agencies, developers, and consultants as a model for analyzing the safety impacts of proposed land use projects and plans on local roadways. The Guidance prioritizes vulnerable users and communities; enhances safety for pedestrians, bicycle, transit and vehicular modes; and applies both reactive and systemic perspectives.

Local Regulations

The following are the local environmental laws and policies relevant to transportation.

Metropolitan Transportation Plan/Sustainable Communities Strategy

The SACOG MTP/SCS is a federally mandated, long-range planning document for identifying and programming roadway improvements throughout the region, including the City of Sacramento.

⁷ California Department of Transportation. *Vehicle Miles Traveled-Focused Transportation Impact Study Guide*. May 20, 2020.



The MTP/SCS is required to be a 20-year multimodal transportation plan that is financially feasible, achieves health standards for clean air, and addresses statewide climate goals.

Sacramento County Transportation Analysis Guidelines

The Sacramento County Transportation Analysis Guidelines were published in September 2020. The Guidelines are intended to provide a clear and consistent technical approach to conducting transportation analyses for Sacramento County land development and transportation projects in compliance with SB 743. They establish analysis techniques for transportation studies based on the current state-of-the-practice in transportation planning and engineering. For example, the Guidelines set forth a number of thresholds for use in analyses within the County, including VMT thresholds per region. The significance thresholds for Sacramento County and recommended VMT metric used to measure VMT are described by land use type.

City of Sacramento 2040 General Plan

The following goals and policies from the City of Sacramento 2040 General Plan related to transportation are applicable to the proposed project.

Land Use and Placemaking Element

Goal LU-4 Walkable, transit-oriented centers and corridors that concentrate new jobs, housing, and entertainment opportunities to support frequent, reliable transit service and foster connected, accessible neighborhoods.

Policy LUP-4.10 **Multi-Modal Access.** The City shall require that new development provide bicycle, pedestrian, and transit access where appropriate to reduce the need for onsite parking and to improve the pedestrian experience within corridors and centers with street trees and landscaping.

Mobility Element

Goal M-1 An equitable, sustainable multimodal system that provides a range of viable and healthy travel choices for users of all ages, backgrounds, and abilities.

Policy M-1.2 **User Prioritization.** The City shall prioritize mobility, comfort, health, safety, and convenience for those walking, followed by those bicycling and riding transit, ahead of design and operations for those driving.

Policy M-1.5 **Street Design Standards.** The City shall maintain street design and operations standards that prioritize comfort and travel time for walking, bicycling, and transit, while managing vehicle speeds and traffic volumes, updating them as best practices evolve.

Policy M-1.11 **Increase Bicycling and Walking.** The City shall strive to increase bicycling and walking citywide so that it can meet its equity, reduced vehicle miles traveled, and sustainability goals.

Policy M-1.13 **Walkability.** The City shall design streets to prioritize walking by including design elements such as the following:



- Grid networks that provide high levels of connectivity;
- Closely spaced intersections;
- Frequent and low-stress crossings;
- Wide, unobstructed walkable sidewalks;
- Separation from vehicle traffic;
- Street trees that provide shading; and
- Minimal curb cuts.

Policy M-1.15 **Improve Walking Connectivity.** The City shall require new subdivisions, new multi-unit dwelling developments, and new developments along commercial corridors to include well-lit, tree-shaded walkways where feasible, that provide direct links to the public realm or adjacent public destinations such as transit stops and stations, schools, parks, and shopping centers.

Policy M-1.16 **Barrier Removal.** The City shall remove barriers to walking, where feasible, and work with utility companies to remove barriers to allow people of all abilities to move with comfort and convenience throughout the city, including through the following:

- Provision of curb ramps, crosswalks, and overpasses;
- Relocation of infrastructure or street furniture that impedes travel pathways;
- Reducing or consolidating driveways and curb cuts;
- Providing long and short-term bicycle and scooter parking to minimize sidewalk obstructions; and
- Creation of additional walking entrances to important destinations like schools, parks, and commercial areas.

Policy M-1.17 **Improve Bicycling Connectivity.** The City shall plan and seek funding for a continuous, low-stress bikeway network consisting of bicycling-friendly facilities that connect neighborhoods with destinations and activity centers throughout the city.

Policy M-1.18 **Bicycling Safety.** When designing projects, the City shall prioritize designs that strengthen the protection of people bicycling such as improvements that increase visibility of bicyclists, increase bikeway widths, raise bikeways, design safer intersection crossings and turns, and separate bikeways from traffic wherever feasible.

Policy M-1.19 **Walking Safety.** When designing projects, the City shall prioritize designs that encourage walking and improve walking safety best practice designs and considerations for efficiencies in walking.



- Policy M-1.23 **Transit Priority.** Where appropriate, the City shall support transit by incorporating features such as bus bulbs, traffic signal priority, queue jumps, and other solutions into priority corridors to improve transit speed, reliability, and operating efficiency while reducing passenger delay.
- Policy M-1.36 **Electric Vehicles (EVs) in New Development.** The City shall support minimum levels of EV infrastructure readiness and installation in new development and incentivize additional levels of EV charging, and EV car share, beyond City Code minimums.
- Policy M-1.40 **Contributions from New Development.** The City shall require new development to construct or pay a proportionate share of the cost of improvements based on mobility-related impacts of the new development.
- Goal M-2 Reduced reliance on single-occupant vehicles.
- Policy M-2.1 **Transportation Demand Management (TDM).** The City should promote the greater use of Transportation Demand Management strategies by employers and residents to reduce dependence on single-occupancy vehicles with the target that 17 percent of all trips are made by transit and active transportation modes by 2030 and 23 percent of all trips are made by transit and active transportation modes by 2045.
- Policy M-2.3 **Vehicle Miles Traveled (VMT) as Metric.** Consistent with state law, the City shall evaluate transportation California Environmental Quality Act (CEQA) impacts using vehicle miles traveled or other metrics as determined by the City, and shall not rely on automobile delay, as described by level of service or similar measures of vehicular delay as a measure of environmental significance. Local Transportation Analyses (LTA) shall continue to be required when necessary to aid in conditioning project entitlements for needed operational improvements.
- Goal M-3 Streets designed and maintained as places that contribute to quality of life.
- Policy M-3.2 **Street Design.** The City shall ensure street design and potential redesign opportunities for existing streets minimize driver speed as appropriate within residential neighborhoods and incorporate street trees wherever possible without compromising connectivity for emergency access or people bicycling, walking, and using mobility devices.

City of Sacramento Traffic Impact Study Guidelines

The City of Sacramento Traffic Impact Study Guidelines, prepared in December 2022, is a living policy document updated and maintained by the City of Sacramento's Public Works Department.



The Traffic Impact Study Guidelines provide basic details regarding methodologies and criteria to assist in the preparation of traffic studies. The Traffic Impact Study Guidelines provide guidance on how to conduct traffic analyses, including what types of software are appropriate to use for each type of analysis, recommendations on assumptions to use for the analysis, how to determine if the project would negatively affect the surrounding transportation network, and how to address the negative effects based on the type of analysis conducted.

4.12.4 IMPACTS AND MITIGATION MEASURES

This section describes the standards of significance and methodology utilized to analyze and determine the proposed project's potential impacts related to transportation and circulation.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, the proposed project would be considered to result in a significant adverse impact on the environment in relation to transportation if the project would result in any of the following:

- Conflict with a program, plan, ordinance, or policy, addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
- Substantially increase hazards to vehicle safety due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

VMT Standards of Significance

The proposed project includes industrial, highway, and commercial land uses. Based on the current practice of the City of Sacramento, transportation impacts are considered significant if the proposed project would result in a VMT per capita or office VMT per employee above 85 percent of the regional average, consistent with technical guidance published by OPR. The OPR guidance does not specify a particular significance threshold for industrial employment and recommends that local jurisdictions determine this threshold based on local conditions. Some jurisdictions in the Sacramento region (including Sacramento County and the City of Rancho Cordova) have determined that the significance threshold for industrial employment is 100 percent of the regional average. The City of Sacramento Transportation Impact Analysis Guidelines do not specify a significance threshold for industrial land uses. Consistent with a May 21, 2021 memo provided to the City of Sacramento for the Florin Perkins Distribution Center, the significance threshold for industrial employment was determined to be 100 percent of the regional average.

New retail development (such as the proposed Highway Commercial Planned Unit Development [HC-PUD] uses) often redistributes trips rather than creating new travel demand. The OPR guidance recommends that lead agencies analyze the net change in VMT to indicate the transportation impact of retail projects. The potential for VMT impacts, according to the approach, hinges on whether the project can be considered local-serving or regional. By adding retail opportunities within existing neighborhoods, local-serving retail projects can shorten trips and reduce overall VMT. In contrast, regional destination retail projects would draw customers from larger trade areas, potentially substituting for shorter trips and increasing VMT. The OPR guidance suggests that any retail projects, including stores larger than 50,000 square feet (sf), might be considered regional serving retail.



Caltrans Facilities

The proposed project is defined to have a significant impact on Caltrans facilities if:

- Project traffic causes off-ramp traffic to queue back beyond the freeway gore point (i.e., the triangled section separating the exit lane from the main portion of the freeway).

Pedestrian Facilities

The proposed project is defined to have a significant impact on pedestrian facilities if implementation of the proposed project would:

- Adversely affect existing or planned pedestrian facilities;
- Fail to adequately provide access for pedestrians; and/or
- Result in unsafe conditions for pedestrians, including unsafe bicycle/pedestrian or pedestrian/motor vehicle conflicts.

Bicycle Facilities

The proposed project is defined to have a significant impact on bicycle facilities if implementation of the proposed project would:

- Adversely affect existing or planned bicycle facilities;
- Fail to adequately provide access by bicycle; and/or
- Result in unsafe conditions for bicycles, including unsafe bicycle/pedestrian or bicycle/motor vehicle conflicts.

Transit Facilities

The proposed project is defined to have a significant impact on transit facilities if implementation of the proposed project would:

- Adversely affect public transit operations;
- Eliminate existing or planned transit service;
- Remove an existing bus stop;
- Cause a substantial rerouting of existing or planned bus service; and/or
- Fail to provide access to transit adequately.

Construction-Related Traffic Impacts

The proposed project is defined to have a significant construction-related traffic if implementation of the proposed project would:

- Degrade an intersection or roadway to an unacceptable level;
- Cause inconveniences to motorists due to prolonged road closures; and/or
- Result in an increased frequency of potential conflicts between vehicles, pedestrians, and bicyclists.

Method of Analysis

The information contained within this chapter is primarily based on a Traffic Impact Analysis, Trip Generation and Distribution Memo, and VMT Analysis Memo prepared for the proposed project by DKS, as well as a VMT Mitigation Memorandum prepared by the City's Public Works Department.



It should be noted that, pursuant to CEQA Guidelines Section 15064.3, impact significance in this chapter is based upon VMT, whereas the results of the Traffic Impact Analysis related to LOS will be used by the City, separate from the analysis in this EIR, to address consistency with Sacramento 2040 General Plan goals and policies related to transportation, including adopted LOS policies. Where applicable, this chapter incorporates the analysis in the Traffic Impact Analysis to address potential safety impacts related to transportation.

Further discussion of the methodology used in the aforementioned documents related to the analysis presented herein is included below. However, the methodology related to LOS, including the study intersections and segments, trip distribution, and LOS analysis scenarios are not discussed further herein; rather, such methodology can be found in the Traffic Impact Analysis included as Appendix N to this EIR.

Project Trip Generation

Regional trip generation and distribution for the proposed project were estimated using a combination of data from the SACOG SACSIM 19 travel demand model and data from the ITE Trip Generation Manual 11th Edition.

For parcels one through five, eight through 11, and the Caltrans parcel, the parcels were assumed to be developed in a manner comparable to the Metro Airpark Project (located on the north side of I-5). As the SACOG SACSIM 19 travel demand model uses “employees” as the land use variable, the building size was converted to the number of employees. To calculate the square footage to employee conversion, the project applicant provided information from comparable facilities throughout the United States, including the adjacent Metro Airpark. Such information was reviewed by City staff, and an employment density of 0.572 employees per 1,000 sf was assigned (one employee per 1,748 sf). Overall, the proposed project was determined to generate a total of 3,781 employees. Of the total employee trips, 96 percent are anticipated to be vehicle trips, three percent are anticipated to be pedestrian trips, and one percent is anticipated to be bicycle trips. The vehicle trips include 71 percent single occupancy vehicles (SOV), and 14 percent high occupancy vehicles.

The total vehicle trip generation rates of the SACOG SACSIM 19 travel demand model (trips per 1,000 sf) were compared to ITE trip generation rates for similar land uses. The SACOG SACSIM 19 travel demand model estimates were determined to be similar to the ITE warehouse rates (the model is higher for daily and AM peak hours and lower for PM peak hours), but lower than light industrial and manufacturing uses. Overall, DKS determined that the model projections are consistent with the warehousing and fulfillment center uses that predominate the Metro Airpark, and further adjustments to the SACOG SACSIM 19 travel demand model for industrial total trip generation purposes were not recommended.

The heavy vehicle trip generation estimates of the travel demand model were compared to the ITE trip generation percentages for similar land uses, as well as data from Metro Airpark. Based on the ITE data, the heavy vehicle trip generation rates were increased and applied with a post-processor methodology to adjust the model estimates to reflect anticipated heavy vehicle travel volumes.

Table 4.12-1 below presents the project trip generation expected for the Industrial PUD (M-1-PUD) uses associated with the proposed project. As shown in Table 4.12-1, approximately 2,559



trips per day (20 percent of the daily trips) are anticipated to be generated by heavy duty truck traffic.

Similar to the M-1-PUD uses, the building sizes of the HC-PUD uses were converted to employees for the SACOG SACSIM 19 travel demand model. Consistent with other retail and service uses in the travel demand model, 500 sf per employee was assumed. Overall, the proposed project is anticipated to generate 33 employees for the land use west of Metro Air Parkway (i.e., parcels 6A through 6C) and 164 employees for the land use east of Metro Air Parkway (i.e., parcels 7A through 7C). Approximately 97 percent of employee trips associated with the HC-PUD uses are anticipated to be vehicle trips, three percent of trips are anticipated to be pedestrian trips, and less than one percent are anticipated to be bicycle trips. It should also be noted that the HC-PUD uses are not anticipated to generate a large number of heavy-duty truck trips, and, as a result, such trips are inherently included in daily trip generation associated with parcels 6A through 7C.

Table 4.12-1
Project Trip Generation – Industrial Planned Unit Development Uses

| | Daily | AM Peak Hour | | | PM Peak Hour | | |
|---------------------------|--------|--------------|------|-------|--------------|------|-------|
| | | Enter | Exit | Total | Enter | Exit | Total |
| Heavy Duty Trucks | 2,559 | 89 | 31 | 119 | 28 | 72 | 100 |
| Total Industrial | 12,794 | 886 | 305 | 1,191 | 281 | 723 | 1,004 |
| Percent Heavy Duty Trucks | 20% | 10% | 10% | 10% | 10% | 10% | 10% |

Source: DKS, 2023.

The recommended trip generation for HC-PUD uses is based upon representative uses from the ITE Trip Generation Manual, 11th Edition. Table 4.12-2 below presents the project trip generation expected for the HC-PUD uses associated with the proposed project.

Vehicle Miles Traveled Assessment

VMT associated with the proposed project was estimated using the latest SACOG SACSIM-19 activity-based travel demand model. Based on the latest SACOG model scripts, SACSIM-19 also reflects the entire trip length, which is consistent with OPR guidance, including the portion of the trip that occurs outside the SACOG region. External-internal and internal-external VMT are calculated using a script file provided by SACOG and included in their model for VMT post-processing. The post-processor determines the added VMT that occurs outside the SACOG region (i.e., for trips that either start or end outside of the region).

Interregional VMT is then added to the internal-internal VMT to determine the total VMT. Pursuant to OPR guidelines, only automobile trips are considered as a part of this analysis. Heavy-duty truck and delivery vehicle VMT, as well as alternative mode VMT (transit vehicles), are not reflected.



**Table 4.12-2
 Project Trip Generation – Highway Commercial Planned Unit Development Uses**

| ITE Land Use | ITE Land Use Code | Project Size (sf) | Daily Trips | AM Peak-Hour | | | PM Peak-Hour | | |
|---|-------------------|-------------------|----------------|--------------|-------------|-------------|--------------|-------------|-------------|
| | | | | Total | In | Out | Total | In | Out |
| Gross Trips | | | | | | | | | |
| 6A - Restaurant | 934 | 3,900 | 1,823 | 174 | 89 | 85 | 129 | 67 | 62 |
| 6B - Restaurant | 934 | 3,900 | 1,823 | 174 | 89 | 85 | 129 | 67 | 62 |
| 6C - Fueling Station / Carwash | 945 | 8,100 | 8,655 | 686 | 343 | 343 | 589 | 295 | 294 |
| 7A - Hotel | 310 | 73,400 | 975 | 56 | 31 | 25 | 72 | 37 | 35 |
| 7B - Restaurant | 934 | 3,900 | 1,823 | 174 | 89 | 85 | 129 | 67 | 62 |
| 7C - Restaurant | 934 | 5,000 | 2,337 | 223 | 114 | 109 | 165 | 86 | 79 |
| Gross Trips Generated | | | 17,436 | 1,487 | 755 | 732 | 1,213 | 619 | 594 |
| Internal Capture Trips | | | | | | | | | |
| 6A/6B/6C | | 15,900 | -729 | -70 | -35 | -35 | -52 | -26 | -26 |
| 7A/7B/7C | | 82,300 | -195 | -11 | -6 | -5 | -14 | -7 | -7 |
| <i>Total Internal Capture Reduction</i> | | | <i>-924</i> | <i>-81</i> | <i>-41</i> | <i>-40</i> | <i>-66</i> | <i>-33</i> | <i>-33</i> |
| Driveway Trips | | | 16,512 | 1,406 | 714 | 392 | 1,147 | 586 | 561 |
| Additional Project Trip Reductions | | | | | | | | | |
| <i>Pass-By Trip Reduction</i> | | | <i>-10,115</i> | <i>-848</i> | <i>-427</i> | <i>-420</i> | <i>-708</i> | <i>-360</i> | <i>-349</i> |
| <i>Total Trip Reductions</i> | | | <i>-11,039</i> | <i>-929</i> | <i>-468</i> | <i>-460</i> | <i>-774</i> | <i>-393</i> | <i>-382</i> |
| Net New External Project Trips | | | 6,397 | 558 | 287 | 272 | 439 | 226 | 212 |
| <i>Source: DKS, 2023.</i> | | | | | | | | | |



Ramp Queuing

A freeway off-ramp queuing analysis was conducted to determine queuing conditions at the off-ramps as a result of traffic from the project. Queue length analysis was estimated using SimTraffic 11. SimTraffic reports the 95th percentile queue length in feet, which can be compared against the available storage length. The focus of the queuing analysis is to specifically determine if adequate storage capacity is available at the off-ramps. Several analysis scenarios were considered as part of the queuing analysis, including the following:

- **Baseline:** Represents average traffic conditions at the year of construction. The baseline scenario includes reasonably foreseeable developments in the short term near the project site, including developments in Metro Air Park and Northlake (Greenbriar).
- **Baseline with Project:** Includes the baseline analysis plus project conditions.
- **Cumulative:** Includes all planned developments and mobility changes for the forecasting year of 2040. The cumulative scenario is based on the City of Sacramento's Draft 2040 General Plan for consistency and is consistent with the regional MTP/SCS.
- **Cumulative with Project:** Includes the cumulative analysis plus project conditions.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts related to transportation is based on implementation of the proposed project in comparison to the existing conditions and the standards of significance presented above.

4.12-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities. Based on the analysis below, the impact is *less than significant*.

The proposed project would include the development of an industrial park within a 353.5-acre portion of the project site. The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. Given that development of both the industrial park and nonparticipating parcels would result in the construction of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Areas

Construction activities associated with the proposed project would include use of construction equipment, including vehicles removing or delivering fill material, bulldozers, and other heavy machinery, as well as building materials delivery, and construction worker commutes. The transport of heavy construction equipment to the site, haul truck trips, and construction worker commutes could affect the local roadway network.

Construction workers typically arrive before the morning peak hour and leave before the evening peak hours of the traditional commute time periods. Deliveries of building material (lumber, concrete, asphalt, etc.) would also normally occur outside of the traditional commute time periods. In addition, any truck traffic to the site would follow



designated truck routes established by Caltrans, and project construction would likely stage any large vehicles (i.e., earth-moving equipment, cranes, etc.) on the site prior to beginning site work and remove such vehicles at project completion. In addition, Sacramento City Code Section 12.20.030 requires that a construction traffic control plan be prepared and approved prior to the beginning of project construction, to the satisfaction of the City Traffic Engineer and subject to review by all affected agencies. All work performed during construction must conform to the conditions and requirements of the approved plan. The plan would ensure that safe and efficient movement of traffic through the construction work zone(s) is maintained. At a minimum, the plan is required to include the following:

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

In addition, the plan must be available at the site for inspection by the City representative during all work. Therefore, with the implementation of the traffic control plan, local roadways and freeway facilities would continue to operate at acceptable operating conditions during project construction.

Based on the above, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.

4.12-2 Conflict with a program, plan, ordinance or policy addressing the circulation system during operations. Based on the analysis below, and with the implementation of mitigation, the impact is less than significant.

Given that development of both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to conflict with a program, plan, ordinance, or policy addressing the circulation system during operations. Because the proposed off-site force main would be installed underground within existing roadway ROW or other previously disturbed areas, operation of the



force main would not conflict with existing or planned pedestrian, bicycle, or transit facilities and services within the project area.

Industrial Park and Nonparticipating Parcels

As discussed throughout this chapter, LOS is no longer the applicable metric when evaluating transportation impacts of a project. The evaluation of VMT is discussed in Impact 4.12-3 of this chapter. Therefore, the following discussion focuses on whether the proposed project would result in impacts to existing or planned pedestrian, bicycle, or transit facilities and services within the project area.

Pedestrian and Bicycle Facilities

As discussed above, the pedestrian system in the project site vicinity consists of sidewalks along Del Paso Road and El Centro Road as the roadways pass through the Sundance Lake and Westlake neighborhoods, as well as an internal trail system within the neighborhoods. In addition, a sidewalk is located along Bayou Way just east of the project site, associated with the existing self-storage facility. The bicycle system in the site vicinity consists of a Class I bike path and Class II bike lanes to the south and east of the project site, around the Westlake and Sundance Lake neighborhoods. Bicycle and pedestrian facilities are not currently located along the project site frontage, as the location is currently undeveloped. As such, the proposed project would not adversely affect existing pedestrian or bicycle facilities. However, the existing site plan does not illustrate where planned pedestrian or bicycle facilities would be on-site. Additionally, the site plan does not currently show the planned Class IV cycle track on the east side of the site, which is in the City's master bicycle network. Because such facilities are not shown on the current site plan, operations of the proposed project could be considered to conflict with a program, plan, ordinance, or policy addressing pedestrian and bicycle facilities, and a potentially significant impact could occur.

Transit Facilities and Services

Public transit in the project vicinity includes a SacRT bus north of the project site. The proposed project would not include features that would conflict with existing or planned transit services. Therefore, operations of the proposed project would not conflict with a program, plan, ordinance, or policy addressing transit facilities, and a less-than-significant impact would occur.

Conclusion

Based on the above, the proposed project would not result in impacts to transit facilities. However, the proposed project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including pedestrian and bicycle facilities during operations. Therefore, a **significant** impact could occur.

Mitigation Measure(s)

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

- 4.12-2 *The following requirements shall be noted on project improvement plans, subject to review and approval by the City of Sacramento Community Development Department:*



- *The project should construct pedestrian and bicycle facilities along its frontage to City Standards.*
- *Class IV separated bicycle facilities shall be accommodated within the proposed cross section to provide separation between cyclists and heavy truck traffic.*
- *The bicycle network shall be connected to the existing and planned City and County bikeway system, including, but not limited to, Bayou Way at the northeast corner of the site, the Class I bikeway at the southeast corner of the site, and Metro Air Parkway north of I-5.*
- *The off-street Class IV cycle track shown on the eastern side of the site in the City Bikeway Master Plan shall be accommodated in the proposed plans.*

4.12-3 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Given that development of both the industrial park and nonparticipating parcels would result in the development of similar land uses on contiguous parcels, the following discussion applies to the potential for both project components to conflict with, or be inconsistent with, CEQA Guidelines Section 15064.3, subdivision(b). Because the proposed off-site force main, including each of the three potential force main segment options, would be installed underground and would not involve generation of vehicle trips during operation, VMT associated with operation of the force main would be negligible. Thus, the proposed off-site force main would not conflict CEQA Guidelines Section 15064.3, subdivision(b).

It should be noted that the SACOG 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) includes 2040 projections for VMT per capita across the Sacramento region in Figure 3.11 of the MTP/SCS. However, the project site is not identified as a VMT-generating location in Figure 3.11, as the MTP/SCS does not identify the project site as land to be developed in the MTP/SCS planning period. Thus, this EIR includes a quantitative analysis of anticipated VMT associated with the proposed project.

Industrial Park and Nonparticipating Parcels

The following discussion includes an analysis of VMT associated with the M-1-PUD and HC-PUD uses proposed on-site, as well as the anticipated industrial development on the nonparticipating parcels.

Industrial Planned Unit Development Uses

As previously discussed, the OPR guidance does not specify a particular significance threshold for industrial land uses, and recommends that local jurisdictions determine a threshold based on local conditions. The threshold for industrial uses is less restrictive compared to other employment types due to the development of industrial uses improving overall VMT efficiency of all future development in aggregate.



Industrial uses generally have more zoning restrictions, and are generally less densely developed than other employment types making them less desirable within urban areas. By keeping industrial uses outside of urban centers, the land that such uses would occupy can instead be used for higher density land development that can see a greater benefit from being located in VMT efficient areas. As such, industrial uses often inherently have higher VMT per employee than other employment types because such uses are located further from housing and services, which are necessary to achieve lower overall VMT levels. As noted above, heavy-duty truck and delivery vehicle VMT, as well as alternative mode VMT (transit vehicles), are not considered herein.

The City of Sacramento Transportation Impact Analysis Guidelines do not specify a significance threshold for industrial land uses. As such, a regional baseline (2016) average VMT per employee metric was used to establish the threshold, which was determined to be 100 percent of the regional average. As discussed above, the regional average VMT per employee was determined to be 17.33. Based on the SACOG SACSIM 19 travel demand model, the on-site M-1-PUD uses are anticipated to generate 22.21 VMT per employee, which is 128 percent of the regional average; above the significance threshold established for the proposed project.

Highway Commercial Planned Unit Development Uses

With regard to the HC-PUD uses, because new retail development often redistributes trips rather than creating new travel demand, the OPR guidance recommends that lead agencies analyze the net change in VMT to indicate the transportation impact of retail projects.

The potential for VMT impacts, according to this approach, hinges on whether the project can be considered local-serving or regional. By adding retail opportunities within existing neighborhoods, local-serving retail projects can shorten trips and reduce overall VMT. In contrast, regional destination retail projects would draw customers from larger trade areas, potentially substituting for shorter trips and increasing VMT. The OPR guidance suggests that any retail projects, including stores larger than 50,000 sf, might be considered regional serving retail. The proposed project does not include any retail uses in excess of 50,000 sf. Therefore, the HC-PUD uses are considered to be local-serving retail, and consistent with OPR guidance, would result in a less-than-significant impact related to VMT.

Conclusion

Based on the above, while the HC-PUD uses would meet the OPR screening criteria associated with local-serving retail uses, the M-1-PUD uses would result in VMT in excess of the applicable threshold of significance. Therefore, the project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and a **significant** impact could occur.

Mitigation Measure(s)

In order to reduce VMT associated with the on-site M-1-PUD uses to 100 percent of the regional average, the proposed project would be required to achieve a 22 percent reduction in VMT. Consistent with SB 743, OPR's Technical Advisory, and the California Air Pollution Control Officers Association (CAPCOA), the proposed project



is required to reduce VMT through the CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. With implementation of such measures, as required by Mitigation Measure 4.12-3, the proposed project would achieve a 22 percent reduction in VMT. Therefore, implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

4.12-3 *Prior to the certificate of occupancy for each on-site industrial building, the owner/operator of each building shall be required to prepare and implement a VMT Reduction Plan that includes a sufficient selection of CAPCOA Trip Reduction Programs (T-6 through T-13) to reduce VMT by at least 22 percent, consistent with the VMT Mitigation Memorandum prepared by the City's Public Works Department for the proposed project (see Appendix Q to the EIR). CAPCOA Trip Reduction Programs T-6 through T-13 include measures such as implementing a commute trip reduction program and/or marketing, providing a rideshare program, implementing a subsidized or discounted transit program, providing end-of-trip bicycle facilities, providing employer-sponsored vanpool, pricing workplace housing, and implementing employee parking cash-out. The VMT Reduction Plan shall be submitted to the City's Department of Public Works and Community Development Department for review and approval.*

4.12-4 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. Based on the analysis below, the impact is *less than significant*.

The following discussion applies to the potential for both project components to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. Because the proposed off-site force main would be installed underground within existing roadway ROW or other previously disturbed areas, operation of the force main would not substantially increase hazards or result in inadequate emergency access.

Industrial Park and Nonparticipating Parcels

A discussion of potential hazards related to vehicle queuing and emergency access/vehicle circulation is provided below.

Vehicle Queuing

As traffic volumes increase vehicle queues typically will also increase at most intersections. A summary of the freeway ramp termini intersection queuing analyses for the Baseline and Baseline with Project conditions are presented in Table 4.12-3 and Table 4.12-4, respectively.



**Table 4.12-3
 Queuing at Freeway Ramp Termini During Peak Hours –
 Baseline Conditions**

| Intersection / Analysis Scenario | Movement | A.M. Peak Hour | | P.M. Peak Hour | |
|---|----------|------------------------|-------------------------------|------------------------|-------------------------------|
| | | Available Storage (ft) | 95 th % Queue (ft) | Available Storage (ft) | 95 th % Queue (ft) |
| 1. Airport Blvd and I-5 northbound ramps | WBL | 1,350 | 20 | 1,350 | 20 |
| 2. Airport Blvd and I-5 southbound ramps | EBL/EBR | 1,375 | 60 | 1,375 | 60 |
| 3. Metro Air Parkway and I-5 northbound ramps | WBL/WBT | 1,575 | 35 | 1,575 | 25 |
| | WBR | 160 | 145 | 160 | 105 |
| | NBL | 160 | 60 | 160 | 20 |
| 4. Metro Air Parkway and I-5 southbound ramps | EBL/EBR | 1,600 | 115 | 1,600 | 50 |
| | SBR | 130 | 90 | 130 | 90 |
| 9. Del Paso Road and I-5 northbound ramps | NBL | 1,270 | 295 | 1,270 | 295 |
| | NBR | 1,270 | 320 | 1,270 | 380 |
| 10. Del Paso Road and I-5 southbound ramps | SBL | 1,100 | 105 | 1,100 | 125 |
| | SBR | 250 | 120 | 250 | 80 |
| 13. West Elkhorn Boulevard and SR 99 northbound ramps | NBL | 1,525 | 145 | 1,525 | 85 |
| 14. West Elkhorn Boulevard and SR 99 southbound ramps | SBL | 400 | 85 | 400 | 165 |
| | SBR | 1,480 | 115 | 1,480 | 85 |

NOTES: EB = eastbound; EBL = eastbound left; EBR = eastbound right; ft = feet; NB = northbound; NBL = northbound left; NBR = northbound right; SB = southbound; SBL = southbound left; SBR = southbound right; WB = westbound; WBL = westbound left; WBR = westbound right
Black bolded results indicate an operational deficiency. **Red bolded** results indicate an operational deficiency either caused by or exacerbated by the project. Values rounded up to the nearest multiple of five.

Source: DKS, 2023.



**Table 4.12-4
 Queuing at Freeway Ramp Termini During Peak Hours –
 Baseline Plus Project Conditions**

| Intersection / Analysis Scenario | Movement | A.M. Peak Hour | | P.M. Peak Hour | |
|---|----------|------------------------|-------------------------------|------------------------|-------------------------------|
| | | Available Storage (ft) | 95 th % Queue (ft) | Available Storage (ft) | 95 th % Queue (ft) |
| 1. Airport Blvd and I-5 northbound ramps | WBL | 1,350 | 20 | 1,350 | 20 |
| 2. Airport Blvd and I-5 southbound ramps | EBL/EBR | 1,375 | 75 | 1,375 | 60 |
| 3. Metro Air Parkway and I-5 northbound ramps | WBL | 350 | 270 | 350 | 175 |
| | WBT/WBR | 1,575 | 180 | 1,575 | 180 |
| | NBL | 100 | 150 | 100 | 145 |
| | NBT | 875 | 220 | 875 | 245 |
| | SBT | 700 | 330 | 700 | 305 |
| | SBR | 650 | 100 | 650 | 95 |
| 4. Metro Air Parkway and I-5 southbound ramps | EBL | 1,600 | 135 | 1,600 | 115 |
| | EBR | 170 | 95 | 170 | 45 |
| | NBL | 300 | 200 | 300 | 220 |
| | NBT | 470 | 205 | 470 | 240 |
| | SBT | 840 | 405 | 840 | 260 |
| | SBR | 130 | 255 | 130 | 185 |
| 9. Del Paso Road and I-5 northbound ramps | NBL | 1,270 | 480 | 1,270 | 355 |
| | NBR | 1,270 | 345 | 1,270 | 465 |
| 10. Del Paso Road and I-5 southbound ramps | SBL | 1,100 | 100 | 1,100 | 135 |
| | SBR | 250 | 140 | 250 | 90 |
| 13. West Elkhorn Boulevard and SR 99 northbound ramps | NBL | 1,525 | 130 | 1,525 | 115 |
| 14. West Elkhorn Boulevard and SR 99 southbound ramps | SBL | 400 | 80 | 400 | 75 |
| | SBR | 1,480 | 150 | 1,480 | 55 |

NOTES: EB = eastbound; EBL = eastbound left; EBR = eastbound right; ft = feet; NB = northbound; NBL = northbound left; NBR = northbound right; SB = southbound; SBL = southbound left; SBR = southbound right; WB = westbound; WBL = westbound left; WBR = westbound right
Black bolded results indicate an operational deficiency. **Red bolded** results indicate an operational deficiency either caused by or exacerbated by the project. Values rounded up to the nearest multiple of five.

Source: DKS, 2023.

As noted in the tables, red bolded text indicates an operational deficiency either caused by or exacerbated by the project. However, as shown in Table 4.12-4, while operational deficiencies exist at the Metro Air Parkway and I-5 northbound ramps at the northbound left lane and the Metro Air Parkway and I-5 southbound ramps at the southbound left lane during both the AM and PM peak hour under Baseline with Project



conditions, such deficiencies would not be caused by or exacerbated by the proposed project. Therefore, a less-than-significant impact would occur related to vehicle queuing associated with the proposed project.

Site Access and Circulation

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

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

Access to the project site would be provided from the north by Metro Air Parkway, which would connect to the proposed Airport South Industrial Drive. The proposed project would include abandonment of the existing South Bayou Way within the project limits, and replacement with a new internal roadway system. Concurrent with abandonment, an access easement would be dedicated over the eastern segment of South Bayou Way (from a proposed cul-de-sac to the new round-a-bout) to serve future industrial Parcels 9-11, and the Caltrans Remnant.

In order to guide truck traffic directly to I-5 and limit traffic impacts to Bayou Way east of the project site, the project would be served by a new internal roadway system including Airport South Industrial Drive, a modified two-lane Local Industrial roadway with a 75-foot-wide ROW, that would bisect the property west to east by connecting Power Line Road to a future street (labeled “A” Drive in Figure 3-3 in the Project Description chapter of this EIR) that would run north along the site’s eastern border and connect to a proposed round-a-bout where Bayou Way meets the project site. It is anticipated that the round-a-bout will have signage and be configured to prohibit off-site truck traffic from the project site, east and south along Bayou Way/EI Centro Road to Del Paso Road. Metro Air Parkway, a modified four-lane Local Industrial roadway with a 97-foot-wide ROW, would be extended south from the existing I-5 interchange to the proposed Airport South Industrial Drive, providing a direct connection for trucks.

The proposed project would be required to comply with all building, fire, and safety codes and specific development plans would be subject to review and approval by the City’s Public Works Department and the City’s Fire Department. Required review by the aforementioned departments would ensure that the proposed circulation system for the project site would provide adequate emergency access. The proposed project would not alter the circulation network of the other local roadways or otherwise prevent emergency vehicle access or evacuation.

Conclusion

Based on the above, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses, or result in inadequate emergency access, and a **less-than-significant** impact would occur.

Mitigation Measure(s)

None required.



Cumulative Impacts and Mitigation Measures

For further detail related to the cumulative setting of the proposed project, refer to Chapter 6, Statutorily Required Sections, of this EIR.

It should be noted that increased traffic volumes on local roadway facilities under cumulative conditions would not substantially alter performance related to bicycle facilities, pedestrian facilities, transit facilities and services, and emergency vehicle access. Rather, impacts to such facilities under cumulative plus project conditions would be similar to those discussed above. In addition, construction activities associated with the project would be complete prior to the cumulative analysis year. Therefore, such topics are not discussed further in the cumulative analysis presented herein.

Similarly, the VMT impact analysis presented under Impact 4.12-3 would also apply to cumulative plus project conditions. The VMT significance threshold compares project-generated VMT per unit of development to that of existing local development. The VMT comparison is useful because the comparison provides information regarding how the project aligns with long-term environmental goals related to VMT established based on existing development levels. Use of VMT significance thresholds based on existing development levels is recommended in the OPR's Technical Advisory. The Technical Advisory indicates that VMT efficiency metrics, such as VMT per service population or VMT per unit of development, may not be appropriate for CEQA cumulative analysis because they employ a denominator. Instead, the Technical Advisory recommends that an impact finding from an efficiency-based project-specific VMT analysis (i.e., existing plus project conditions) would imply an identical impact finding for a cumulative VMT analysis.⁸ An example provided by OPR explains that a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Therefore, an analysis of VMT is not presented in this cumulative discussion as the conclusion would remain identical to that presented under Impact 4.12-3.

However, with regard to vehicle queuing, Cumulative and Cumulative with Project conditions could differ from Baseline and Baseline with Project conditions due to the increase in traffic on project area roadways associated with cumulative development. Therefore, an analysis of impacts associated with vehicle queuing under Cumulative and Cumulative with Project conditions is discussed below.

4.12-5 Substantially increase cumulative hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Based on the analysis below, the impact is *less than cumulatively considerable*.

The following discussion applies to the potential for both project components to substantially increase cumulative hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). As previously discussed, operation of the force main would not substantially increase hazards or result in inadequate emergency access.

⁸ Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA* [pg. 6]. December 2018.



Industrial Park and Nonparticipating Parcels

A summary of the freeway ramp termini intersection queueing analyses for the Baseline and Cumulative and Cumulative with Project conditions are presented in Table 4.12-5 and Table 4.12-6, respectively.

| Table 4.12-5 Queuing at Freeway Ramp Termini During Peak Hours – Cumulative Conditions | | | | | |
|---|-----------------|---------------------------------------|---|---------------------------------------|---|
| Intersection / Analysis Scenario | Movement | A.M. Peak Hour | | P.M. Peak Hour | |
| | | Available Storage (ft) | 95th % Queue (ft) | Available Storage (ft) | 95th % Queue (ft) |
| 1. Airport Blvd and I-5 Northbound ramps | WBL | 1,350 | 20 | 1,350 | 20 |
| 2. Airport Blvd and I-5 southbound ramps | EBL/EBR | 1,375 | 75 | 1,375 | 65 |
| 3. Metro Air Parkway and I-5 Northbound ramps | WBL | 350 | 85 | 350 | 40 |
| | WBT/WBR | 1,575 | 280 | 1,575 | 250 |
| | NBL | 100 | 260 | 100 | 200 |
| | NBT | 875 | 95 | 875 | 70 |
| | SBT | 700 | 390 | 700 | 700 |
| 4. Metro Air Parkway and I-5 southbound ramps | EBL | 1,600 | 95 | 1,600 | 85 |
| | EBR | 170 | 60 | 170 | 65 |
| | NBL | 300 | 40 | 300 | 40 |
| | NBT | 470 | 15 | 470 | 20 |
| | SBT | 840 | 50 | 840 | 275 |
| 9. Del Paso Road and I-5 Northbound ramps | NBL | 1,270 | 1905 | 1,270 | 1200 |
| | NBR | 1,270 | 1845 | 1,270 | 1270 |
| 10. Del Paso Road and I-5 southbound ramps | SBL | 1,100 | 150 | 1,100 | 295 |
| | SBR | 250 | 185 | 250 | 250 |
| 13. West Elkhorn Boulevard and SR 99 Northbound ramps | NBL | 1,525 | 330 | 1,525 | 1455 |
| | NBR | 420 | 145 | 420 | 325 |
| 14. West Elkhorn Boulevard and SR 99 southbound ramps | SBL | 1,480 | 115 | 1,480 | 90 |
| | SBR | 400 | 130 | 400 | 175 |

NOTES: EB = eastbound; EBL = eastbound left; EBR = eastbound right; ft = feet; NB = Northbound; NBL = Northbound left; NBR = Northbound right; SB = southbound; SBL = southbound left; SBR = southbound right; WB = westbound; WBL = westbound left; WBR = westbound right
Black bolded results indicate an operational deficiency. **Red bolded** results indicate an operational deficiency either caused by or exacerbated by the project. Values rounded up to the nearest multiple of five.

Source: DKS, 2023.



**Table 4.12-6
 Queuing at Freeway Ramp Termini During Peak Hours –
 Cumulative with Project Conditions**

| Intersection / Analysis Scenario | Movement | A.M. Peak Hour | | P.M. Peak Hour | |
|---|----------|------------------------|-------------------------------|------------------------|-------------------------------|
| | | Available Storage (ft) | 95 th % Queue (ft) | Available Storage (ft) | 95 th % Queue (ft) |
| 1. Airport Blvd and I-5 Northbound ramps | WBL | 1,350 | 20 | 1,350 | 20 |
| 2. Airport Blvd and I-5 southbound ramps | EBL/EBR | 1,375 | 75 | 1,375 | 70 |
| 3. Metro Air Parkway and I-5 Northbound ramps | WBL | 350 | 245 | 350 | 185 |
| | WBT/WBR | 1,575 | 190 | 1,575 | 255 |
| | NBL | 100 | 175 | 100 | 220 |
| | NBT | 875 | 135 | 875 | 145 |
| | SBT | 700 | 240 | 700 | 705 |
| | SBR | 650 | 35 | 650 | 460 |
| 4. Metro Air Parkway and I-5 southbound ramps | EBL | 1,600 | 145 | 1,600 | 120 |
| | EBR | 170 | 115 | 170 | 100 |
| | NBL | 300 | 80 | 300 | 105 |
| | NBT | 470 | 165 | 470 | 140 |
| | SBT | 840 | 275 | 840 | 465 |
| | SBR | 130 | 45 | 130 | 360 |
| 9. Del Paso Road and I-5 Northbound ramps | NBL | 1,270 | 2795 | 1,270 | 2110 |
| | NBR | 1,270 | 2960 | 1,270 | 2200 |
| 10. Del Paso Road and I-5 southbound ramps | SBL | 1,100 | 165 | 1,100 | 365 |
| | SBR | 250 | 210 | 250 | 305 |
| 13. West Elkhorn Boulevard and SR 99 Northbound ramps | NBL | 1,525 | 330 | 1,525 | 1,465 |
| | | 420 | 155 | 420 | 330 |
| 14. West Elkhorn Boulevard and SR 99 southbound ramps | SBL | 1,480 | 125 | 1,480 | 80 |
| | SBR | 400 | 135 | 400 | 180 |

NOTES: EB = eastbound; EBL = eastbound left; EBR = eastbound right; ft = feet; NB = Northbound; NBL = Northbound left; NBR = Northbound right; SB = southbound; SBL = southbound left; SBR = southbound right; WB = westbound; WBL = westbound left; WBR = westbound right
Black bolded results indicate an operational deficiency. **Red bolded** results indicate an operational deficiency either caused by or exacerbated by the project. Values rounded up to the nearest multiple of five.

Source: DKS, 2023.

As traffic volumes increase, vehicle queues typically will also increase at most intersections. However, as shown in the tables, queueing across multiple intersections was identified under both the Cumulative and Cumulative with Project conditions related to the ramp metering to the on-ramps to Caltrans facilities.

According to DKS, ramp meters on such intersections may ultimately operate differently than was assumed for the analysis presented herein, which would result in less queueing along Metro Air Parkway southbound and Del Paso Road approaching



the interchange in both directions. Nonetheless, the project would contribute to queuing caused by such ramp meters.

With regard to queuing on the Caltrans off-ramps, according to DKS, two locations are expected to exceed the available queue storage in the Cumulative condition: Del Paso Road and the I-5 Northbound Ramps, and Del Paso Road and the I-5 southbound ramps. At Del Paso Road and the I-5 Ramps, the project would contribute traffic volumes sufficient to increase the already deficient 95th percentile queues by several car lengths. However, based on Caltrans guidance related to freeway queuing, the proposed project would not result in a significant impact related to traffic safety, as the queues already spill back onto the mainline under the Cumulative condition, without the addition of project traffic.

Therefore, the project's incremental contribution to significant cumulative impacts related to traffic safety would be ***less than cumulatively considerable*** under Cumulative with Project conditions.

Mitigation Measure(s)

None required.



4.13 TRIBAL CULTURAL RESOURCES

4.13 TRIBAL CULTURAL RESOURCES

4.13.1 INTRODUCTION

The Tribal Cultural Resources chapter of the EIR addresses known and unknown tribal cultural resources in the vicinity of the project area. Pursuant to Public Resources Code (PRC) Section 21074, tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1. A Tribal cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

As discussed further in Chapter 3, Project Description, of this EIR, the project site is divided into two portions: the industrial park, which consists of the majority of the western portion and the northeast corner of the overall site, and the nonparticipating parcels, primarily located in the southeastern portion of the overall site. While the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City of Sacramento City limits, only the industrial park is currently proposed for development. In addition, the proposed project would include construction of an off-site force main to convey wastewater generated from the proposed uses to the 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way.

This chapter summarizes the existing setting with respect to tribal cultural resources, identifies thresholds of significance, evaluates potential project impacts to such resources, and sets forth mitigation measures. Information presented in this chapter is primarily drawn from a Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC), project notification letters sent by the City to Native American individuals and organizations pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18, follow-up Native American consultation, and a Cultural Resources Study prepared by Tom Origer & Associates,¹ as well as the City of Sacramento 2040 General Plan² and the City of Sacramento 2040 Master EIR (MEIR).³

4.13.2 EXISTING ENVIRONMENTAL SETTING

A detailed overview of the project area's cultural history is included in Chapter 4.5, Cultural Resources of this EIR. The sections below provide an ethnographic overview of tribal history within the project area, as well as an overview of the tribal outreach conducted for the project site by Tom Origer & Associates during preparation of the site-specific Cultural Resources Study, formal AB 52 and SB 18 tribal consultation conducted by the City, and any known tribal cultural resources on-site.

¹ Tom Origer & Associates. *Cultural Resources Study for the Airport South Industrial Park Project*. March 7, 2022.

² City of Sacramento. *Sacramento 2040 General Plan*. Adopted February 27, 2024.

³ City of Sacramento. *Sacramento 2040 General Plan and Climate Action & Adaptation Plan Master Environmental Impact Report*. August 2023.



Ethnographic Overview of the Project Area

Linguists and ethnographers tracing the evolution of languages have found that most of the indigenous languages of the California region belong to one of five widespread North American language groups (the Hokan and Penutian phyla, and the Uto-Aztecan, Algonic, and Athabaskan language families). The distribution and internal diversity of four of the groups suggest that original centers of dispersal were outside, or peripheral to, the core territory of California, which are the Central Valley, the Sierra Nevada, the Coast Range from Cape Mendocino to Point Conception, and the Southern California coast and islands. Only languages of the Hokan phylum can be traced back to populations inhabiting parts of California's core region during the Archaic period, and hints of connections exist between certain branches of Hokan, such as between the Salinan and Seri, which suggest that at least some of the Hokan languages could have been brought into California by later immigrants, primarily from the Southwest and northwestern Mexico.

Around 2500 BC, ancestors to Miwok and Costanoans occupied the lower Sacramento Valley, which coincides with the occurrence of the Windmill Pattern in the same area. Utian-speaking populations remained in the lower Sacramento Valley until the arrival of Europeans and spread in all directions. When Europeans arrived in California, Penutian-speakers made up the majority of the state.

At the time of Euro-American settlement, the project area was situated in a region controlled by the Nisenan. The Nisenan territory encompassed a region bounded on the west by the Sacramento River, between the American and Consumnes rivers to the south, the crest of the Sierra Nevada to the east, and to the north the boundary was not clearly established to ethnographers but lies a few miles south of the Feather River. The Nisenan were hunter-gatherers who lived in rich environments that allowed for dense populations with complex social structures. The Nisenan settled in permanent villages, often with clusters of small settlements located near and around the larger village. The Valley Nisenan built villages on low, natural rises along streams and rivers or on gentle slopes with a southern exposure. Very few villages were located within the valley plain as that area was reserved for hunting, gathering, and fishing. The Hill Nisenan built villages on ridges and large flats along major waterways and were often smaller than the Valley Nisenan villages. Primary village sites were occupied throughout the year and other sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites were often situated near fresh water sources and in ecotones where plant life and animal life were diverse and abundant.

Local Native Americans that inhabited the area appear to have had an economy based largely on hunting, with limited exchange, and social structures based on the extended family unit. Later, milling technology and an inferred acorn economy were introduced. The diversification of economy appears to be coeval with the development of sedentism and population growth and expansion. Sociopolitical complexity and status distinctions based on wealth are also observable in the archaeological record, as evidenced by an increased range and distribution of trade goods (e.g., shell beads, obsidian tool stone), which are possible indicators of both status and increasingly complex exchange systems. Archaeological site indicators expected to be found in the region include but are not limited to: obsidian and chert flakes and chipped stone tools; grinding and mashing implements such as slabs and hand-stones, and mortars and pestles; and locally darkened midden soils containing some of the previously listed items plus fragments of bone, shellfish, and fire-affected stones.

In 1833, a great epidemic swept through the Sacramento Valley. The epidemic has been attributed to malaria, and is estimated to have killed seventy-five percent of the native population, leaving only a shadow of the original population to face the intruding miners and settlers. The



Nisenan of the mountain areas felt less of the impact of European settlement in California than the Valley Nisenan, who were subjected to some missionization. The Mountain Nisenan, remote from the early impacts of settlers, were overwhelmed by the gold rush. Native ways of life were almost totally abandoned, and today only a few families in Placer, Nevada, Yuba, and El Dorado counties identify themselves as Nisenan and can speak the language.⁴

Many descendants of Valley Nisenan throughout the larger Sacramento region belong to the United Auburn Indian Community, Shingle Springs, Lone Band, Colfax-Todds Valley, and Wilton Rancheria Tribes. The tribes actively participate in the identification, evaluation, preservation, and restoration of Tribal Cultural Resources.

Tribal Outreach

The following discussion includes a description of the tribal outreach activities that were conducted for the project site by Tom Origer & Associates, during preparation of the site-specific Cultural Resources Study. The Lead Agencies also conducted formal AB 52 and SB 18 consultation for the proposed project, which is discussed in later sections of this Chapter.

Tom Origer & Associates contacted the NAHC requesting a search of the SLF for traditional cultural resources within or near the project site on January 21, 2022. The results of the search returned by the NAHC on February 7, 2022 were negative for Native American cultural resources in the project vicinity. The NAHC provided contact information for tribal members or organizations affiliated with the region, and recommended that the tribes be contacted for more information on the potential for Native American cultural resources within or near the project site. Tom Origer & Associates contacted each of the tribes included on the list provided by the NAHC.

At the time the Cultural Resources Study was prepared, responses had not been received by any of the tribes contacted by Tom Origer & Associates. However, on March 9, 2022, the Yocha Dehe Wintun Nation responded by email, and deferred all correspondence regarding the proposed project to the United Auburn Indian Community of the Auburn Rancheria (UAIC) and Wilton Rancheria. Neither the UAIC, nor the Wilton Rancheria responded to the tribal outreach activities conducted by Tom Origer & Associates; however, as detailed below, the UAIC provided a response to the City's official notification.

Tribal Consultation

In compliance with AB 52 (PRC Section 21080.3.1) and PRC Section 21082.3, the Lead Agencies must consult with tribes traditionally and culturally affiliated with the project area that have requested formal notification and responded with a request for consultation. The parties must consult in good faith. Consultation is deemed concluded when the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource when one is present or when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed on during the consultation process must be recommended for inclusion in the environmental document.

Pursuant to AB 52, project notification letters were sent by the Lead Agencies on January 27, 2022 to tribes who requested notification of proposed projects within this geographic area. Specifically, AB 52 notification letters were sent to the UAIC, Wilton Rancheria, Shingle Springs Band of Miwok Indians, and Buena Vista Rancheria. Similarly, SB 18 notification letters were sent by the City on January 27, 2022 to a list of tribes that were identified by the NAHC as being culturally or traditionally affiliated with the project area, including the Buena Vista Rancheria of

⁴ City of Sacramento. *Sacramento 2035 General Plan Background Report*. August 2014.



Me-Wuk Indians, Lone Band of Miwok Indians, Shingle Springs Band of Miwok Indians, Tsi Akim Maidu, UAIC, Wilton Rancheria, and Colfax-Todds Valley Consolidated Tribe.

The City received one response to both the AB 52 and SB 18 notification letters from the UAIC, with a request to consult on the proposed project due to the cultural sensitivity of the area. The City subsequently initiated consultation with the UAIC. Consultation included the provision of the Cultural Resources Study to the UAIC for review. The UAIC provided tribe-specific mitigation, which is included in the analysis below, to be implemented as part of the proposed project. The UAIC did not provide any comments on the Cultural Resources Study, and further requests for consultation were not received. As such, consultation with the UAIC has since been closed.

The UAIC is a federally recognized tribe comprised of both Miwok and Maidu (Nisenan) Tribal members who are traditionally and culturally affiliated with the project area. The tribe has a deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The Tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. The tribe's goal is to ensure the preservation and continuance of their cultural heritage for current and future generations.

Known Tribal Cultural Resources

As described in detail above, the City of Sacramento and the surrounding area are known to have been occupied by Native American groups for thousands of years prior to settlement by non-Native peoples. As such, archaeological materials, including human burials, have been found throughout the City, some in deeply buried contexts. Generalized areas of high sensitivity for cultural resources are located within close proximity to the Sacramento and American rivers and moderate sensitivity was identified near other watercourses. However, the City designates a wide swath of land along the American River as Parks, which limits development and impacts on sensitive cultural resources. High-sensitivity areas may be found in other areas related to the ancient flows of the rivers, with differing meanders than found today. Recent discoveries during infill construction in downtown Sacramento have shown that the downtown area is highly sensitive for archaeological and pre-contact indigenous resources. For example, Native American burials and artifacts were found in 2005 during construction of the new City Hall.

Based on a search of the NAHC SLF, as described in further detail in the Method of Analysis section below, recorded Native American sacred sites or traditional cultural properties are not known to exist within the project site. In addition, during the course of the field surveys conducted by Tom Origer & Associates as part of the Cultural Resources Study, archaeological resources associated with Native American tribes were not discovered on the project site. However, according to the Cultural Resources Study, the project site is located within District P-34-005225, which was recorded in 2018 as a Tribal Cultural Landscape of the Nisenan and the Plains Miwok. The Landscape consists of natural waterways, riparian forests, and wetlands that supported the lifeways of the local inhabitants. Because the proposed off-site force main alignment occurs along existing roadway right-of-way (ROW) and other previously disturbed areas, known tribal cultural resources do not occur along the force main alignment.

4.13.3 REGULATORY CONTEXT

Federal, State, and local governments have developed laws and regulations designed to protect significant tribal cultural resources that may be affected by actions that they undertake or regulate. The following section contains a summary of basic federal and State laws governing preservation of tribal cultural resources of national, regional, State, and local significance.



Federal Regulations

The following are the federal environmental laws and policies relevant to tribal cultural resources.

Section 106 of the National Historical Preservation Act of 1966

Federal regulations for cultural resources are governed primarily by Section 106 of the National Historical Preservation Act (NHPA) of 1966. Section 106 of NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 Code of Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places (NRHP). The criteria for determining NRHP eligibility are found in 36 CFR Part 60. Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must follow federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if a project requires a federal permit or uses federal funding.

State Regulations

The following are the State environmental laws and policies relevant to tribal cultural resources.

Assembly Bill 52

AB 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. "Tribal cultural resources" are defined as either:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- (2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Under AB 52, a project that may cause a substantial adverse change in the significance of a Tribal Cultural Resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. AB 52 (PRC 21080.3.1) requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe(s) requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe(s). Consultation may include discussing the type of



environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe(s).

Senate Bill 18

SB 18, signed into law in September 2004, requires local (city and county) governments to consult with California Native American tribes, when amending or adopting a general plan or specific plan, or designating land as open space, in order to aid in the protection of traditional tribal cultural places ("cultural places"). The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). The proposed project includes a General Plan Amendment, and, thus, is subject to SB 18 consultation requirements.

Public Resources Code Section 5024.1(c)

According to PRC Section 5024.1(c), a resource may be listed as an historical resource in the California Register if the resource meets any of the following NRHP criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Local Regulations

The following are the local environmental laws and policies relevant to tribal cultural resources.

City of Sacramento General Plan

Goals and policies from the City's 2040 General Plan related to tribal cultural resources are presented below.

Goal HCR-1 Historic and cultural resources that enrich our sense of place and our understanding of the City's prehistory and history.

Policy HCR-1.13 **Indigenous Cultures.** The City shall seek ways to recognize the peoples who first lived in, traveled, and traded in what is now the Sacramento area, by working with tribal representatives to preserve their identity, culture, and artifacts. Methods for recognizing tribal history and imagery may include, but are not limited to, the following:

- Public art that provides a Native American perspective including works by Native artists;



- Naming of parks and places that reflects local Native American heritage and/or restores tribal names;
- Parks and recreation programming that increases awareness of tribal heritage and culture (including through interpretive displays) and allows opportunities for craft sharing;
- Incorporation of traditional native plants into landscape design palettes.

Policy HCR-1.15

Treatment of Native American Human Remains. The City shall treat Native American human remains with sensitivity and dignity and ensure compliance with the associated provisions of California Health and Safety Code and the California Public Resources Code. The City shall collaborate with the most likely descendants identified by the Native American Heritage Commission.

Policy HCR-1.17

Evaluation of Archeological Resources. The City shall work in good faith with interested communities to evaluate proposed development sites for the presence of sub-surface historic, archaeological, and tribal cultural resources that may be present at the site. These efforts may include the following:

- Consideration of existing reports and studies,
- Consultation with Native American tribes as required by State law,
- Appropriate site-specific investigative actions, and
- Onsite monitoring during excavation if appropriate.

4.13.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to tribal cultural resources. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, an impact related to tribal cultural resources is considered significant if the proposed project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k); or
 - 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Method of Analysis

The impact analysis contained in this chapter is primarily based on a SLF search conducted by the NAHC, project notification and offer to consult letters sent by the City to Native American individuals and organizations, and follow-up Native American consultation pursuant to AB 52 and SB 18, as well as a Cultural Resources Study prepared by Tom Origer & Associates. The methods of analysis are described in further detail below.

Native American Tribal Consultation

As discussed above, Tom Origer & Associates contacted the NAHC to request a search of the SLF to determine whether known tribal cultural resources are located within or near the project area. The SLF is populated by members of the Native American community who have knowledge about the locations of tribal resources. In requesting a search of the SLF, Tom Origer & Associates solicited information from the Native American community regarding tribal cultural resources; however, the responsibility to formally consult with the Native American community lies exclusively with the federal and local agencies under applicable State and federal law.

Per the NAHC's suggestion, Tom Origer & Associates contacted each of the following Native American tribes or individuals with the potential to have knowledge of cultural resources in the project area:

- Buena Vista Rancheria of Me-Wuk Indians;
- Chicken Ranch Rancheria of Me-Wuk Indians;
- Confederated Villages of Lisjan;
- Guidiville Indian Rancheria, Ione Band of Miwok Indians;
- Nashville Enterprise Miwok-Maidu-Nishinam Tribe;
- Tule River Indian Tribe;
- UAIC;
- Wilton Rancheria;
- Cachil Dehe Band of Wintun Indians of the Colusa Indian Community;
- Colfax-Todds Valley Consolidated Tribe;
- North Valley Yokuts Tribe;
- Shingle Springs Band of Miwok Indians;
- Tsi Akim Maidu;
- Yocha Dehe Wintun Nation; and
- Muwekma Ohlone Indian Tribe of the San Francisco Bay Area.

In addition to the outreach conducted by Tom Origer & Associates, and in compliance with AB 52 (PRC Section 21080.3.1) and SB 18, project notification letters were distributed by the Lead Agencies on January 27, 2022 to the appropriate tribes in the project area. Specifically, pursuant to AB 52, project notification letters were sent by the City to the UAIC, Wilton Rancheria, Shingle Springs Band of Miwok Indians, and Buena Vista Rancheria. SB 18 notification letters were sent by the City to the Buena Vista Rancheria of Me-Wuk Indians, Ione Band of Miwok Indians, Shingle Springs Band of Miwok Indians, Tsi Akim Maidu, UAIC, Wilton Rancheria, and Colfax-Todds Valley Consolidated Tribe.



Tom Origer & Associates did not receive responses from any tribes other than the Yocha Dehe Wintun Nation, who deferred all correspondence regarding the proposed project to the UAIC and Wilton Rancheria. Neither the UAIC, nor the Wilton Rancheria responded to the tribal outreach activities conducted by Tom Origer & Associates. However, the City received one response to both the AB 52 and SB 18 notification letters from the UAIC requesting formal consultation. The UAIC requested a copy of the Cultural Resources Study prepared for the proposed project, which was provided to the tribe.

UAIC Background Search

The UAIC conducted background search for the identification of tribal cultural resources for the proposed project, which included a review of pertinent literature, historic maps, and a records search using UAIC's Tribal Historic Information System (THRIS). UAIC's THRIS database is composed of UAIC's areas of oral history, ethnographic history, and places of cultural and religious significance, including UAIC Sacred Lands that are submitted to the NAHC. The THRIS resources shown in this region also include previously recorded indigenous resources identified through the CHRIS as well as historic resources and survey data.

Field Survey Methods

A mixed-strategy field survey was conducted at the project site by Tom Origer & Associates on February 9 and 10, 2022. An additional site visit was conducted on February 16, 2022. Field conditions during the field survey and site visit were warm, clear, and dry. Most of the project site was examined by walking in zig-zags within 15-meter corridors and hoes were used as needed to expose the ground surface. Ground visibility ranged from excellent to poor, with vegetation and imported gravel being the primary hindrances. The area between Interstate 5 (I-5) and Bayou Way had been subject to several cultural resources studies and also recently developed with I-5 off/on ramps and connector roads, so the area was surveyed in a cursory manner.

In addition to a surface survey, attempts were made to observe subsurface soils. The banks of ditches and canals within and adjacent to the project site were examined, when possible. Three hand-dug borings were excavated using a 4-inch diameter barrel auger. One auger boring went to a depth of 100 centimeters and the other two went to a depth of 150 centimeters. The locations were chosen to avoid portions of the project site that were inundated during prehistoric times and to be within a geological formation that dates to the Holocene Epoch.

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified above.

4.13-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The 474.4-acre project site is undeveloped and consists entirely of agricultural land. The proposed project would include the development of an industrial park within a 353.5-acre portion of the project site. The project site also includes several nonparticipating parcels, comprised of approximately 83 acres. As the footprints of the proposed industrial park and nonparticipating parcels are contiguous, the potential for impacts to tribal cultural resources to occur from development of either project



component would be similar. Thus, the following discussion applies to the potential for both project components to impact historical resources. In addition, the analysis includes evaluation of the proposed off-site improvements.

Industrial Park, Nonparticipating Parcels, and Off-Site Improvement Area

As noted previously, a records search of the NAHC SLF did not indicate the presence of tribal cultural resources within the project site. In addition, archaeological resources associated with Native American tribes were not discovered on the project site during field surveys conducted by Tom Origer & Associates. Furthermore, while the project site is located within District P-34-005225, which was recorded in 2018 as a Tribal Cultural Landscape of the Nisenan and the Plains Miwok, the Cultural Resources Study concluded that important elements of the Tribal Cultural Landscape, including waterways, tule habitats, fisheries, and wildlife, are not present within the project site.

Considering the results of the literature search and the prehistory and history of the area, the project site was determined by Tom Origer & Associates to range in low to high potential for buried archaeological site indicators, with the level of potential dependent on the specific location within the overall project site. However, auger borings were excavated in the locations that had the highest potential for buried resources, and archaeological site indicators were not found in the auger borings or in exposed banks. Therefore, the potential for buried archaeological site indicators to occur on-site was reduced to a low to moderate potential. In addition, while the UAIC requested to review the Cultural Resources Study as part of consultation, the tribe did not provide any comments on the Cultural Resources Study. In addition, aside from the request to include tribe-specific mitigation within this chapter, as presented below, the UAIC did not have any additional comments or concerns regarding the proposed project and further requests for consultation were not received.

While known tribal cultural resources are not located within the project site, the possibility exists that buried tribal cultural resources associated with local tribes could occur within the project site. In addition, the proposed off-site force main alignment occurs along existing roadway ROW and other previously disturbed areas. Thus, tribal cultural resources are not anticipated to occur within the force main alignment. However, due to the off-site force main's location underground, the possibility of construction of the proposed off-site improvements encountering unknown tribal cultural resources cannot be entirely ruled out. Therefore, ground-disturbing activities associated with the proposed project could cause a substantial change in the significance of a Tribal Cultural Resource as defined in PRC Section 21074, and a **significant** impact could occur.

Mitigation Measure(s)

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

- 4.13-1(a) **Conduct Cultural Resources Sensitivity and Awareness Training Prior to Ground-Disturbing Activities**



The City shall require the applicant/contractor to provide a tribal cultural resources sensitivity and awareness training program (Worker Environmental Awareness Program [WEAP]) for all personnel involved in project construction, including field consultants and construction workers. The WEAP will be developed in coordination with culturally affiliated Native American tribes. The WEAP shall be conducted before any project-related construction activities begin at the project site. The WEAP will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations.

The WEAP will also describe appropriate avoidance and impact minimization measures for tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential tribal cultural resources are encountered. The WEAP will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values.

4.13-1(b)

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

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

- *Planning construction to avoid tribal cultural resources, archaeological sites and/or other cultural resources; incorporating cultural resources within parks, green-space or other open space; covering archaeological resources; deeding a cultural resource to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity.*
- *Recommendations for avoidance of tribal cultural resources will be reviewed by the City representative, interested culturally affiliated Native American tribes and other appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may*



include realignment within the project site to avoid tribal cultural resources, modification of the design to eliminate or reduce impacts to tribal cultural resources or modification or realignment to avoid highly significant features within a cultural resource or tribal cultural resource.

- *Native American representatives from interested culturally affiliated Native American tribes will be notified to review and comment on these analyses and shall have the opportunity to meet with the City representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.*
- *If the discovered tribal cultural resource can be avoided, the construction contractor(s), will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. The boundary of a tribal cultural resource will be determined in consultation with interested culturally affiliated Native American tribes and tribes will be notified to monitor the installation of fencing. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.*
- *The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an “Environmentally Sensitive Area”.*

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

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

If a tribal cultural resource is determined to be eligible for listing in the CRHR, the City will avoid damaging effects to the resource in accordance with California PRC Section 21084.3, if feasible. The City shall coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior’s Professional Qualifications Standards for Archeology) approved by the City and with interested culturally affiliated Native American tribes that respond to the City’s notification. As part of the site investigation and resource assessment, the City and the archaeologist shall consult with interested culturally affiliated Native American tribes to assess the significance of the find, make recommendations for further evaluation and treatment



as necessary and provide proper management recommendations should potential impacts to the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record. For any recommendations made by interested culturally affiliated Native American tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

Native American representatives from interested culturally affiliated Native American tribes and the City representative will also consult to develop measures for long-term management of any discovered tribal cultural resources. Consultation will be limited to actions consistent with the jurisdiction of the City and taking into account ownership of the subject property. To the extent that the City has jurisdiction, routine operation and maintenance within tribal cultural resources retaining tribal cultural integrity shall be consistent with the avoidance and minimization standards identified in this mitigation measure.

If the City determines that the project may cause a significant impact to a tribal cultural resource, and measures are not otherwise identified in the consultation process, the following are examples of mitigation capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to the resource. These measures may be considered to avoid or minimize significant adverse impacts and constitute the standard by which an impact conclusion of less-than significant may be reached:

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

4.13-1(c)

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



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

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

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

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. For further detail related to the cumulative setting of the proposed project, see Chapter 5, Statutorily Required Sections, of this EIR.

4.13-2 Cause a cumulative loss of tribal cultural resources. Based on the analysis below, the cumulative impact is *less than significant*.

Generally, while some tribal cultural resources may have regional significance, the resources themselves are site-specific, and impacts to them are project-specific. For example, impacts to a subsurface tribal cultural resource at one project site would not generally be made worse by impacts to a tribal cultural resource at another site due to development of another project. Rather, the resources and the effects upon them are



generally independent. A possible exception to the aforementioned general conditions would be where a tribal cultural resource represents the last known example of its kind or is part of larger resource site. For such a resource, cumulative impacts, and the contribution of a project to them, may be considered cumulatively significant.

As described throughout this chapter, the project site does not contain known resources that would be eligible for inclusion on the NRHP or considered significant pursuant to CEQA. Furthermore, implementation of the project-specific mitigation measures set forth in this EIR (Mitigation Measures 4.13-1[a] through 4.13-1[c]) would ensure that any impacts to previously unknown, subsurface resources that are discovered on the project site during construction activities are reduced to less than significant.

Similar to the proposed project, future development projects within the City would be required to consult with tribes culturally and traditionally affiliated with the project area to implement project-specific mitigation to ensure any potential impacts to identified tribal cultural resources are reduced to a less-than-significant level, where possible. Therefore, given that tribal cultural resource impacts are generally site-specific and each future project within the City would be required to mitigate such impacts, any potential impacts associated with cumulative buildout of the City would not combine to result in a significant cumulative impact.

Based on the above, the potential for impacts related to a cumulative loss of tribal cultural resources, to which implementation of the proposed project might contribute, is ***less than significant***.

Mitigation Measure(s)

None required.



5. EFFECTS NOT FOUND TO BE SIGNIFICANT

5. EFFECTS NOT FOUND TO BE SIGNIFICANT

5.1 INTRODUCTION

Section 15128 of the CEQA Guidelines requires that an EIR briefly describe why various environmental effects were determined not to be significant and therefore were not discussed in detail in the EIR. The Effects Not Found to be Significant chapter of this EIR summarizes environmental issues that were determined not to be significant with implementation of the proposed project. The reasons for the conclusion of non-significance are provided for each issue area, as applicable, below.

5.2 FORESTRY RESOURCES

Consistent with Appendix G of the CEQA Guidelines, the proposed project was determined to have no impact with regard to the following issue areas:

- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code [PRC] Section 12220[g]), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]); or
- Result in the loss of forest land or conversion of forest land to non-forest use.

The project site is not considered forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), and is not zoned Timberland Production (as defined by Government Code Section 51104[g]). In addition, installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway ROW or in other previously disturbed areas. As such, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland, or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the project would result in no impact.

5.3 GEOLOGY AND SOILS

Consistent with Appendix G of the CEQA Guidelines, the proposed project was determined to have no impact with regard to the following issue areas:

- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

As stated in Chapter 3, Project Description, of the EIR, one of the project objectives for the proposed project is to amend the Sphere of Influence of the Sacramento Area Sewer District (SacSewer) to provide wastewater services to the project site. Therefore, the proposed project would not use septic tanks or alternative wastewater disposal systems, and no impact would occur related to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.



5.4 HAZARDS AND HAZARDOUS MATERIALS

Consistent with Appendix G of the CEQA Guidelines, the proposed project was determined to have no impact with regard to the following issue areas:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires.

As discussed in Chapter 4.12, Transportation, of this EIR, the proposed project would comply with Sacramento 2040 General Plan policies and design standards, and, as a result, would not impair any emergency response or evacuation plans. As discussed in further detail below, the proposed project is not located within a Very High Fire Hazard Severity Zone or a High Fire Hazard Severity Zone as assessed by the California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program. As such, no impact would occur with respect to wildfires.

5.5 MINERAL RESOURCES

Consistent with Appendix G of the CEQA Guidelines, the proposed project was determined to have no impact with regard to the following issue areas:

- Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state; or
- 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.

According to the California Geological Survey Information Warehouse: Mineral Land Classification, Portland Cement, Concrete-Grade Aggregate and Clay Resources are found in the greater Sacramento region. The Sacramento County General Plan EIR evaluated potential impacts related to mineral resources that could occur through buildout of the County's General Plan planning area and concluded that because the County could not rule out the possibility of future development precluding or inhibiting the extraction of known, available, high-quality mineral resources in the Jackson Highway Corridor growth area, the impact would be significant and unavoidable. However, the County's General Plan EIR notes that only a relatively small portion of the County overlies known, high-quality mineral resources that are available for extraction. Additionally, the majority of the County's mineral resources are located in the northwest portion of the Jackson Highway Corridor growth area, generally between the intersection of Elder Creek Road and Elk Grove Florin Road and the south side of Mather Airport. The project site is not located within the aforementioned area. Furthermore, the City of Sacramento Master EIR (MEIR) states that should a project lead to the loss of the availability of known mineral resources of State, regional, or local importance, adherence to SMARA and the City Code would promote compatibility with surrounding land uses for both future and existing mineral production activities and prevent development that would limit these activities. Because the proposed project would be required to comply with the foregoing requirements, and due to the project site's location outside of the Jackson Highway Corridor growth area, a less-than-significant impact would occur.

5.6 POPULATION AND HOUSING

Consistent with Appendix G of the CEQA Guidelines, the proposed project was determined to have no impact with regard to the following issue areas:



- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The project site is currently not developed with residential development. In addition, installation of the proposed off-site force main, including each of the three potential force main segment options, would occur either in existing roadway ROW or in other previously disturbed areas. Thus, the proposed project would not result in the displacement of existing housing or residents, and no impact would occur.

5.7 WILDFIRE

Consistent with Appendix G of the CEQA Guidelines, the proposed project was determined to have no impact with regard to the following issue areas:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- 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;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- Expose people or structures to significant risks, including downslope or downstream flooding, or landslides, as a result of the runoff, post-fire slope instability, or drainage changes.

The project site is not located in a Very High Fire Hazard Severity Zone or a High Fire Hazard Severity Zone as assessed by the CAL FIRE Fire and Resource Assessment Program. Additionally, the project site is not located in a State Responsibility Area. As such, there would be no impact with respect to wildfires.

In addition, as discussed in Chapter 4.12, Transportation, of this EIR, the proposed project would comply with Sacramento 2040 General Plan policies and design standards, and as a result would not impair any emergency response or evacuation plans. Similarly, the project site is located on flat land, and therefore, would not exacerbate fire risks or expose people or structures to risks due to a slope. Finally, the project site is surrounded by existing and planned development which would serve as a fire break to decrease fire risks.



6. STATUTORILY REQUIRED SECTIONS

6. STATUTORILY REQUIRED SECTIONS

6.1 INTRODUCTION

The Statutorily Required Sections chapter of the Draft EIR includes discussions regarding those topics that are required to be included in an EIR, pursuant to CEQA Guidelines, Section 15126.2. The chapter includes a discussion of the proposed project's potential to result in growth-inducing impacts; the cumulative setting analyzed in this EIR; significant irreversible environmental changes; and significant and unavoidable impacts caused by the proposed project.

6.2 GROWTH-INDUCING IMPACTS

State CEQA Guidelines section 15126.2(e) requires an EIR to evaluate the potential growth-inducing impacts of a proposed project. Specifically, an EIR must discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped.

The CEQA Guidelines are clear that while an analysis of growth-inducing effects is required, it should not be assumed that induced growth is necessarily significant or adverse. This analysis examines the following potential growth-inducing impacts related to implementation of the proposed project and assesses whether these effects are significant and adverse (see *CEQA Guidelines*, Section 15126.2[e]):

1. Foster population and economic growth, or the construction of housing.
2. Eliminate obstacles to population growth.
3. Affect service levels, facility capacity, or infrastructure demand.
4. Encourage or facilitate other activities that could significantly affect the environment.

Foster Population and Economic Growth, or the Construction of Housing

As discussed in further detail in Chapter 3, Project Description, of this EIR, while the proposed project would require approval of a Sphere of Influence (SOI) Amendment and Annexation of the entire project site into the City of Sacramento limits, only the industrial park is currently proposed for development. Although the nonparticipating parcels portion of the project site is planned for future industrial development, such development is not currently proposed. It is noted that because the project site is not currently located within the City of Sacramento SOI and requires approval of a General Plan Amendment (GPA) and Rezoning, buildout of the project site, as well as any associated population or economic growth, has not been anticipated or analyzed in the City of Sacramento 2040 General Plan Master EIR (MEIR). However, the 2040 MEIR does mention probable future projects within Sacramento County, including the Airport South Industrial Project.



As discussed further under Impact 4.9-4 in the Land Use and Planning/Population and Housing chapter of this EIR, the proposed project would include the development of the industrial park portion of the project with industrial and retail/highway commercial uses, including hotel/hospitality uses. Because of the industrial and commercial nature of the proposed project, buildout would not directly result in an increase in population or construction of housing.

While construction of the proposed project would result in a limited increase in construction employment opportunities, construction would be temporary, and jobs would likely be filled by the local employee base. Therefore, an increase in permanent population and a demand for housing in the vicinity of the project site as a result of the construction-related employment opportunities associated with the proposed project would not occur.

The proposed project would also provide long-term employment opportunities associated with operation of the proposed industrial and commercial facilities. Although development of the proposed project could generate a total of approximately 4,000 employees, new employees would likely be drawn from current residents in the area. According to the City's population projections, as presented in Table 4.9-4, City of Sacramento Population Growth Projections, in Chapter 4.9, Land Use and Planning/Population and Housing, of this EIR, the population of the City of Sacramento is anticipated to increase from 2020 to 2030 by 111,515. Conservatively estimating that all permanent positions associated with the project would be filled by new residents to the Sacramento region and assuming that the proposed project would be fully built out and operating at full capacity by 2030, the project's contribution to the overall population increase by 2030 would be approximately 0.77 percent. Thus, the increase in jobs would be relatively small compared to the City's existing and anticipated population levels. As such, the proposed project would not result in a substantial increase in permanent population and a demand for housing in the vicinity of the project site.

Surrounding existing land uses include a Life Storage facility and the Westlake single-family residential subdivision to the east; the West Drainage Canal, vacant agricultural land, open space land, and the Paso Verde K-8 School to the south; undeveloped agricultural land to the west; the Sacramento International Airport to the northwest, across I-5; and the Metro Air Park, Amazon SMF-1 Fulfillment Center, and the under-construction Northlake (Greenbriar) subdivision to the north, across I-5. It should also be noted that the approved Sacramento International Airport Master Plan is located to the northwest of the project site, and the proposed SWIFT Project is located adjacent to the project site's western boundary. As such, the project site is surrounded to the north, west, and east by existing, planned, or proposed development. Therefore, development of the proposed project would not result in additional development in the vicinity of the project site beyond what has been anticipated.

The proposed project has the potential to foster economic growth due to the commercial nature and employment opportunities of the proposed project. However, it is reasonable to assume that the magnitude of economic growth would not be substantial such that new business growth would result elsewhere in the region which could necessitate additional housing to support the employment base. Thus, while the project would foster economic growth, a less-than-significant impact related to population and economic growth would occur.

Eliminate Obstacles to Population Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service



infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services, would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

As discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, the City of Sacramento operates and maintains a 30-inch water transmission main in Bayou Way that terminates near the eastern boundary of the project site. The proposed project would include the installation of new 12-inch water lines which would connect to the existing 30-inch water transmission main to serve the project site. However, water infrastructure would not be extended beyond the project site to serve other areas, and the proposed project does not include residential uses. Thus, the proposed water system is not anticipated to result in elimination of obstacles to population growth. Additionally, although the proposed project would include installation of an off-site force main, which would extend from the northeastern corner of the project site to the existing 48-inch Sacramento Area Sewer District (SacSewer) North Natomas interceptor line in East Commerce Way, the force main would be sized to accommodate wastewater flows from only the project site, and as discussed, the project does not include residential uses. Thus, the proposed off-site force main would not directly or indirectly induce population growth.

As detailed in the Project Description chapter of this EIR, sanitary sewer conveyance service within the project site would be provided through a gravity system, which would include the extension of new sewer lines from the project site to existing off-site trunk lines, and would require the installation of a new pump station. However, the gravity system would be sized to accommodate the proposed project's wastewater generation only. Therefore, the proposed gravity system would not serve to eliminate obstacles to population growth in the project vicinity.

Based on the above, all utility infrastructure improvements involved in the proposed project would exclusively serve the proposed project. Additionally, as noted above, the proposed project would include a SOI Amendment and Annexation, as well as a GPA and Rezoning. As part of approval of the SOI Amendment, the City of Sacramento SOI would be amended to include the project site, which would facilitate Annexation of the project site into the City; development of the industrial park portion of the project, as well as future development of the nonparticipating parcels, has not been anticipated by the MEIR. However, the foregoing entitlements would only apply to the project site and would not allow for further expansion of the City boundaries or additional development beyond what is proposed. Therefore, the project would not be anticipated to eliminate any obstacles to population growth.

Affect Service Levels, Facility Capacity, or Infrastructure Demand

Increases in population that would occur as a result of a proposed project, including the proposed industrial park and future development of the nonparticipating parcels within the Annexation Area, may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental impacts. As discussed in Chapter 4.11, Public Services, Utilities, and Service Systems, of this EIR, increased demands for fire and police protection services attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts. In addition, wastewater generated by the proposed project could be accommodated by wastewater treatment facilities and infrastructure proposed as part of the project, including the proposed off-site force main alignment, and existing water supply infrastructure exists to accommodate the domestic water demand associated with the proposed project.



The landfill that would serve the proposed project has adequate capacity to manage the solid waste generated as result of the project. Furthermore, mitigation measures set forth in Chapter 4.8, Hydrology and Water Quality, of this EIR would ensure that the proposed project would not create or contribute runoff water that would exceed the capacity of the proposed and existing stormwater drainage systems. Therefore, the proposed project would not increase population such that service levels, facility capacity, or infrastructure demand would require construction of new facilities that could cause significant environmental impacts.

Encourage or Facilitate other Activities That Could Significantly Affect the Environment

This EIR provides a comprehensive assessment of the potential for environmental impacts associated with implementation of the proposed project. Please refer to Chapters 4.1 through 4.13 of this EIR, which comprehensively address the potential for impacts from development on the project site.

6.3 CUMULATIVE IMPACTS

CEQA Guidelines, Section 15130 requires that an EIR discuss the cumulative and long-term effects of the proposed project that would adversely affect the environment. “Cumulative impacts” are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines, Section 15355). “[I]ndividual effects may be changes resulting from a single project or a number of separate projects” (CEQA Guidelines, Section 15355, subd. [a]). “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (CEQA Guidelines, Section 15355, subd. [b]).

The need for cumulative impact assessment reflects the fact that, although a project may cause an “individually limited” or “individually minor” impact that, by itself, is not significant, the increment may be “cumulatively considerable,” and, thus, significant, when viewed together with environmental changes anticipated from past, present, and probable future projects (CEQA Guidelines, Section 15064[h][1] and Section 15355[b]). Accordingly, particular impacts may be less than significant on a project-specific basis but significant on a cumulative basis if their small incremental contribution, viewed against the larger backdrop, is cumulatively considerable. However, it should be noted that CEQA Guidelines, Section 15064, Subdivision (h)(4) states, “[...]the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.” Therefore, even where cumulative impacts are significant, any level of incremental contribution is not necessarily deemed cumulatively considerable.

Section 15130(b) of CEQA Guidelines indicates that the level of detail of the cumulative analysis need not be as great as for the project impact analyses, but that analysis should reflect the severity of the impacts and their likelihood of occurrence, and that the analysis should be focused, practical, and reasonable. To be adequate, a discussion of cumulative effects must include the following elements:

- (1) Either (a) a list of past, present and probable future projects, including, if necessary, those outside the agency’s control, or (b) a summary of projections contained in an adopted general plan or related planning document, or in a prior certified EIR, which



described or evaluated regional or area-wide conditions contributing to the cumulative impact, provided that such documents are referenced and made available for public inspection at a specified location;

- (2) A summary of the individual projects' environmental effects, with specific reference to additional information and stating where such information is available; and
- (3) A reasonable analysis of all of the relevant projects' cumulative impacts, with an examination of reasonable, feasible options for mitigating or avoiding the project's contribution to such effects (Section 15130[b]).

For some projects, the only feasible mitigation measures will involve the adoption of ordinances or regulations, rather than the imposition of conditions on a project-by-project basis (Section 15130[c]). Section 15130(a)(3) states that an EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable, and thus not significant, if a project is required to implement or fund the project's fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

A discussion of cumulative impacts is provided within each of the technical chapters of this EIR pursuant to CEQA Guidelines Section 15130.

Cumulative Setting

The lead agency should define the relevant geographic area of inquiry for each impact category (id., Section 15130, subd. [b][3]), and should then identify the universe of "past, present, and probable future projects producing related or cumulative impacts" relevant to the various categories, either through the preparation of a "list" of such projects or through the use of "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact" (id., subd. [b][1]).

As discussed above, two approaches exist for identifying cumulative projects and their associated impacts. The "list" approach identifies individual projects known to be occurring or proposed in the surrounding area in order to identify potential cumulative impacts. The "projection" approach uses a summary of projections in adopted General Plans or related planning documents to identify potential cumulative impacts. This EIR uses the projection approach for the cumulative analysis, which is based upon a summary of projections contained in the City of Sacramento 2040 General Plan and the Sacramento County General Plan. The reason for using these two adopted plans as the cumulative setting is that although the project site is currently part of Sacramento County, following project approval, the project site would be annexed into the City of Sacramento's Sphere of Influence. Planned and future development within the City's 2040 General Plan policy area or areas within Sacramento County in the project vicinity include the Sacramento County WattEV Innovative Freight Terminal Project, the Northlake (Greenbriar) Project, the Metro Air Park Project, the Elkhorn Boulevard Extension Project, the Upper West Side Specific Plan, the Sacramento International Airport Master Plan, and the Grandpark Specific Plan.

Limited situations exist where the geographic setting differs for certain CEQA topics. Examples include air quality, for which the cumulative geographic setting is the Sacramento Valley Air Basin (SVAB). Global climate change is, by nature, a cumulative impact. Emissions of GHG contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change (e.g., sea level rise, impacts to water supply and water quality, public health impacts, impacts to



ecosystems, impacts to agriculture, and other environmental impacts). A single project could not generate enough GHG emissions to contribute noticeably to a change in the global average temperature. However, the combination of GHG emissions from a project in combination with other past, present, and future projects could contribute substantially to the world-wide phenomenon of global climate change and the associated environmental impacts. Although the geographical context for global climate change is the Earth, for analysis purposes under CEQA, and due to the regulatory context pertaining to GHG emissions and global climate change applicable to the proposed project, the geographical context for global climate change in this EIR is limited to the State of California.

In addition, as discussed in Chapter 4.8, Hydrology and Water Quality, of this EIR, the cumulative analysis is defined by watershed boundaries. The project site is located within the Natomas Basin. Overall, the total watershed area being analyzed within this EIR includes approximately 50,000 acres.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Per CEQA Guidelines Section 15126.2(d), this EIR is required to include consideration of significant irreversible environmental changes that would be caused by the proposed project, should the project be implemented. An impact would be determined to be a significant and irreversible change in the environment if:

- Buildout of the project area could involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of development could generally commit future generations to similar uses (e.g., a highway provides access to a previously remote area);
- Development of the proposed project could involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing and eventual development of the project could result in an unjustified consumption of resources (e.g., the wasteful use of energy).

The proposed project would likely result in, or contribute to, the following significant irreversible environmental changes:

- Irreversible consumption of construction materials, such as lumber, associated with the proposed project;
- Irreversible consumption of goods and services, such as fire and police services, associated with project buildout;
- Irreversible consumption of energy and natural resources, such as water, electricity, and natural gas, associated with project buildout;
- Irreversible conversion of agricultural land to non-agricultural use; and
- Irreversible conversion of biological habitat to urban use.

6.5 SIGNIFICANT AND UNAVOIDABLE IMPACTS

According to CEQA Guidelines, an EIR must include a description of those impacts identified as significant and unavoidable should the proposed action be implemented (CEQA Guidelines Section 15126.2[c]). Such impacts would be considered unavoidable when the determination is made that either mitigation is not feasible or only partial mitigation is feasible such that the impact is not reduced to a level that is less-than-significant. This section identifies significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigations imposed by the



City of Sacramento and the Sacramento Local Agency Formation Commission (LAFCo). The final determination of the significance of impacts and the feasibility of mitigation measures would be made by the City and the Sacramento LAFCo as part of their certification actions. The significant and unavoidable impacts of the proposed project are summarized below.

In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point) or, in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality. (Impact 4.1-3)

Implementation of the proposed project would result in a significant impact related to the change of the existing public viewsheds of the site from predominantly undeveloped, disced fields with scattered trees and bushes to industrial and commercial development. Although the inclusion of landscaping trees would partially obscure views of the industrial park portion of the project site, the existing visual character and quality of public views of the site would be substantially degraded by development of both components of the proposed project. Feasible mitigation does not exist to reduce such impacts to a less-than-significant level. Therefore, a significant and unavoidable impact would occur.

Long-term changes in visual character associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan and the Sacramento County General Plan (Impact 4.1-5)

Development of the proposed project, in combination with existing and planned development in the project vicinity, including the Northlake (Greenbriar) subdivision currently under construction northeast of the project site, the industrial development associated with the Metro Air Park north of the site, and the development associated with the Sacramento International Airport northwest and west of the site, the proposed project would contribute towards significantly altering the visual character of the surroundings. Therefore, the impact would be significant and unavoidable.

Impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. (Impact 4.2-1)

While the nonparticipating parcels do not contain land that is defined as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and, thus, would not result in negative impacts to such resources upon future development, construction activities on the rest of the project site would result in conversion of approximately 31.3 acres of Prime Farmland and approximately 12.1 acres of Farmland of Statewide Importance in the northeast corner of the project site. While implementation of Mitigation Measure 4.2-1 would preserve an equivalent acreage of Farmland elsewhere, the proposed project would result in the conversion of agricultural land to urban uses, and would not create new agricultural land; as such, the proposed project would lead to an overall loss of Farmland. Therefore, the impact would remain significant and unavoidable.

Impacts related to compliance with the policies of Sacramento LAFCo pertaining to the conversion of agricultural land. (Impact 4.2-4)

The proposed project site is currently located within Sacramento County and has a Sacramento County General Plan land use designation of Agricultural Cropland and is zoned AG-80. The



proposed project would include a request for annexation of the 474.4-acre project site to the City of Sacramento, which ultimately requires the approval of Sacramento LAFCo. Sacramento LAFCo policies related to agricultural land include those related to the conversion of areas containing prime soils or productive agricultural operations to uses that are not conducive to agricultural production. Because the project site is proposed to be annexed into the City of Sacramento and the industrial park portion of the site is proposed for commercial and industrial development, on-site soils are evaluated in comparison to the Sacramento LAFCo's definition of prime agricultural land. The project site contains an approximate total of 385.3 acres of soils that qualify for rating as Class II when irrigated in the Soil Conservation Service land use capability classification. Criteria (a) of the Sacramento LAFCo's definition of prime agricultural land applies to soils that qualify as Class I or Class II, regardless of whether the soil is non-irrigated or irrigated, provided that irrigation is feasible. Thus, soils within the proposed project site meet criteria (a) to qualify as prime agricultural farmland under Section 56064 of the Cortese-Knox-Hertzberg Act. Potential mitigation for impacts related to the conversion of prime agricultural land to non-agricultural uses could include purchasing agricultural conservation easements outside the project area. However, as discussed above, such mitigation would not create new agricultural land; rather, the mitigation would simply preserve existing agricultural land elsewhere. Feasible mitigation measures do not exist to reduce the above impact to a less-than-significant level. Therefore, the impact would remain significant and unavoidable.

Impacts related to cumulative loss of agricultural land. (Impact 4.2-5)

Development of the proposed project, as well as other development within the County's General Plan policy area, such as the proposed Upper Westside Specific Plan, the Sacramento International Airport Master Plan, the Grandpark Specific Plan, and Metro Air Park, would contribute to the cumulative loss of agricultural land. Therefore, even with implementation of mitigation, the project's incremental contribution to the cumulative impact is cumulatively considerable and significant and unavoidable.

Conflict with or obstruct implementation of the applicable air quality plan during project operation. (Impact 4.3-2)

Emissions resulting from operation of the proposed project under both the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario would be below the applicable Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds for Particulate Matter (PM₁₀ and PM_{2.5}). However, reactive organic gases (ROG) and oxides of nitrogen (NO_x) emissions would be above the applicable SMAQMD thresholds of significance under both project scenarios. Therefore, operation of the proposed project could create a conflict with or obstruct implementation of the applicable air quality plan. Although Mitigation Measure 4.3-2 requires preparation and implementation of a project-specific Air Quality Mitigation Plan (AQMP) which would result in a 35 percent reduction in emissions, emission levels would still exceed the applicable threshold of significance and, therefore, the impact would remain significant and unavoidable.



Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). (Impact 4.3-6)

The proposed project is within a nonattainment area for ozone and PM₁₀. By nature, air pollution is largely a cumulative impact. The population growth and vehicle usage within the nonattainment area from the proposed project, in combination with other past, present, and reasonably foreseeable projects within Sacramento and surrounding areas, contributes to the region's adverse air quality impacts on a cumulative basis, and could either delay attainment of AAQS or require the adoption of additional controls on existing and future air pollution sources to offset emission increases. Thus, the project's emissions of criteria air pollutants would contribute to cumulative regional air quality effects. The proposed project's unmitigated cumulative contribution to regional emissions is equivalent to the project's unmitigated operational emissions. As such, although the proposed project's unmitigated operational emissions of PM₁₀ and PM_{2.5} would be below the SMAQMD's applicable thresholds of significance, because the proposed project would result in operational emissions of ROG and NO_x, which exceed all applicable SMAQMD thresholds of significance, the proposed project could be considered to result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment.



7. ALTERNATIVES ANALYSIS

7. ALTERNATIVES ANALYSIS

7.1 INTRODUCTION

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; a reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; and the environmentally superior alternative.

7.2 PURPOSE OF ALTERNATIVES

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to “[...] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” In the context of CEQA Guidelines Section 21061.1, “feasible” is defined as:

[...]capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, “The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” Section 15126.6(f) of CEQA Guidelines further states:

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative.”

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).
- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if



these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).

- The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination [...] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

Based on the above, reasonable alternatives to the project must be capable of feasibly attaining most of the basic objectives of the project. The proposed project is being pursued with the following objectives:

1. Utilize a targeted municipal service review to amend the City's Sphere of Influence, followed by Annexation of the project site into the City of Sacramento, to construct a high-quality industrial park with elevated aesthetics to be capable of serving warehouse, distribution, research, and other light industrial uses, as well as retail and commercial uses.
2. Utilize a targeted municipal service review to amend the Sphere of Influence of the Sacramento Area Sewer District (SacSewer) to provide wastewater services to the project site.
3. Create substantial, permanent employment opportunities for residents of the City of Sacramento and surrounding areas, including the North Natomas area and the Northlake project site.
4. Provide light industrial and warehousing opportunities closer to the City of Sacramento developed areas, thereby lowering local and regional vehicle miles traveled (VMT) and traffic congestion.
5. Provide needed retail, commercial, and hotel uses along the I-5 corridor in close proximity to Sacramento International Airport.



6. Attract new businesses and jobs to the City, thereby improving the jobs/housing balance both in the City and the region.
7. Construct an industrial park that incorporates energy efficiency and low water use principles in order to promote the City's environmental goals.
8. Utilize alternative energy sources, including solar panels, where feasible.
9. Locate the project as near as possible to existing developed areas and utility infrastructure with anticipated capacity.
10. Create an internal roadway network for the project site that will allow for efficient access to the site and limit impacts to offsite roadways by directing truck traffic directly to Interstate 5.
11. Phase project construction to be responsive to market demands.
12. Minimize environmental impacts to surrounding areas, including residential communities and other sensitive land uses.

Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. The significant and unavoidable impacts identified in the EIR are presented below.

- ***Aesthetics.*** The EIR determined that the proposed project would result in significant and unavoidable impacts related to substantially degrading the existing visual character or quality of public views of the site and its surroundings. Although the inclusion of landscaping trees would partially obscure views of the industrial park portion of the project site, the existing visual character and quality of public views of the site would be substantially degraded by development of both components of the proposed project. In addition, the EIR determined that the proposed project would result in significant and unavoidable impacts related to long-term changes in visual character associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan and the Sacramento County General Plan.
- ***Agricultural Resources.*** The EIR determined that the proposed project would result in significant and unavoidable impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, even with implementation of mitigation measures. While the Nonparticipating Parcels do not contain such land, construction activities on the rest of the project site would result in conversion of approximately 31.3 acres of Prime Farmland and approximately 12.1 acres of Farmland of Statewide Importance. Similarly, because the project site is proposed to be annexed into the City of Sacramento and the industrial park portion of the site is proposed for commercial and industrial development, on-site soils are evaluated in comparison to the Sacramento Local Agency Formation Commission's (LAFCo) definition of prime agricultural land. The EIR identified significant and unavoidable impacts related to compliance with the policies of the Sacramento LAFCo pertaining to the conversion of agricultural land even with implementation of mitigation measures.
- ***Air Quality, GHG Emissions, and Energy.*** The EIR determined that the proposed project would result in significant and unavoidable impacts related to conflicting with or obstructing implementation of the applicable air quality plan during project operation under both the Proposed Project Scenario and the Full Buildout of the Annexation Area Scenario because



the reactive organic gases (ROG) and oxides of nitrogen (NO_x) emissions would be above the applicable Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds of significance. Additionally, the EIR determined that the amount of ROG and NO_x emissions generated by the proposed project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (AAQS).

7.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to “set forth only those alternatives necessary to permit a reasoned choice.” As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The CEQA Guidelines provide a definition for “a range of reasonable alternatives” and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA Guidelines Section 21061.1, “feasible” is defined as:

[...] capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative.”

Alternatives Considered But Dismissed From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant project impacts, while still meeting most of the basic project objectives.

As stated in Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:

- (i) failure to meet most of the basic project objectives,
- (ii) infeasibility, or
- (iii) inability to avoid significant environmental impacts.

Regarding item (ii), infeasibility, among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context),



and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). The aforementioned factors do not establish a fixed limit on the scope of reasonable alternatives.

An off-site alternative and mixed use residential alternative were considered but dismissed from detailed analysis in this EIR. The reasons for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

Off-Site Alternative

The possibility of an off-site location was considered as an alternative to the proposed project. The County's Geographic Information System (GIS) database was consulted to provide information regarding vacant properties in the area of sufficient size to accommodate the proposed project. In considering sites potentially available for future development, the objectives of the proposed project were used to assess the suitability of available sites.

Various potential sites were reviewed. The location that comes closest to feasibility is located northwest of the intersection of Fruitridge Road and South Watt Avenue in the southeast portion of the City, and is already designated Industrial Mixed-Use by the Sacramento 2040 General Plan. Use of this land for an off-site alternative would not require the City to annex the land or expand its Sphere of Influence. Other sites were not identified, and thus, the Fruitridge and South Watt Avenue site was reviewed.

In order to include a comparable amount of acreage to the proposed project, the off-site alternative would require the demolition of several commercial businesses, including, but not limited to, a building materials store, furniture store, and 7-Eleven convenience store. In addition, approximately 117 acres of the 354 acres required of the alternative would consist of land already set aside for L and D Landfill. Given that buildout of the off-site alternative at this location would require the project applicant to either redesign the proposed project to build around existing commercial businesses or reduce the amount of land designated for residential development while simultaneously demolishing existing businesses, the Off-Site Alternative would be in direct conflict with the project objectives concerning improvement of the job and housing balance in the City and the region. Finally, the project applicant does not own the identified alternative site.

Overall, off-site alternatives that could accomplish the project objectives or accommodate a similar type and intensity of development as the proposed project are not considered feasible. As a result, the Off-Site Alternative is dismissed from detailed evaluation.

Mixed-Use Residential Alternative

Given that the proposed project already contains plans for industrial development and commercial development, the proposed project is already considered a mixed-use project. However, the Mixed-Use Residential Alternative would include buildout of the project site as proposed for the majority of the parcels, while designating Parcels 5 and 8 for a residential neighborhood. The Mixed-Use Residential Alternative would result in the development of 704,320 fewer square feet (sf) of industrial buildings than the proposed project, and would develop approximately 109.7 acres of agricultural land as residential.

However, the development of portions of the project site with residential uses would prevent the proposed project from developing employment uses, as specified in the project objectives, and could result in conflicts related to the incompatibility between residential and industrial land uses.



Buildout of the Mixed-Use Residential Alternative would require the modification of the proposed entitlement actions, such as the addition of residential designations to the requested GPA and Rezoning. Additionally, the proximity of the new residential development on-site, such as on Parcel 8, may result in significant impacts (e.g., noise conflicts, exposure to toxic air contaminants, etc.) with the planned industrial uses of the proposed project.

Overall, a Mixed-Use Residential Alternative that could accomplish the project objectives is not considered feasible. As a result, the Mixed-Use Residential Alternative is dismissed from detailed evaluation.

100 Percent Electric Fleet Alternative

The 100 Percent Electric Fleet Alternative would consist of buildout of the project site as proposed, including the future industrial warehouse buildout, and would require all active warehouses to develop the entire truck fleet with electric vehicles (EVs) at full buildout.

Because the 100 Percent Electric Fleet Alternative would include development of the project site with the proposed uses, all of the project objectives would be met. In addition, because the 100 Percent Electric Fleet Alternative would include the operation of EVs over gas-powered vehicles, the project objectives concerning energy efficiency, utilizing alternative energy sources, and minimizing impacts would be improved. In the case of an electric fleet, impacts associated with air quality and GHG emissions would be most significantly reduced by this Alternative.

However, requiring the proposed project to maintain a completely electric fleet would render the project infeasible. EVs are an emerging technology and are not yet produced on a scale that would allow future tenants of the proposed industrial park to maintain a completely electric fleet. As such, requiring a fully electric fleet of any future tenants would limit the pool of potential tenants to such a degree that extensive vacancies could occur, or that the project site would be unable to develop the parcels consistent with the project objectives. As such, the 100 Percent Electric Fleet Alternative was dismissed from detailed evaluation.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project (No Build) Alternative;
- 20 Percent Electric Fleet Alternative; and
- Reduced Footprint Alternative.

Each of the project alternatives is described in detail below, with a corresponding analysis of each alternative's impacts in comparison to the proposed project. As discussed above, reasonable alternatives to the project must be capable of avoiding or substantially lessening a new significant impact or substantial increase in severity of a significant impact, as identified by this EIR. Therefore, this chapter focuses on the resource areas and specific impacts listed above that have been identified in this EIR for the proposed project as requiring new or modified mitigation to reduce significant impacts to less than significant, or have been found to remain significant and unavoidable. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6(d), which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.



The analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the proposed project. When comparing the potential impacts resulting from implementation of the foregoing alternatives, the following terminology is used:

- “Fewer” = Less than Proposed Project;
- “Similar” = Similar to Proposed Project;
- “Greater” = Greater than Proposed Project; and
- “None” = No impact.

When the term “fewer” is used, the reader should not necessarily equate this to elimination of significant impacts identified for the proposed project. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the proposed project, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation. In other cases, the use of the term “fewer” may mean the actual elimination of an impact identified for the proposed project altogether. Similarly, use of the term “greater” does not necessarily imply that an alternative would require additional mitigation beyond what has been required for the proposed project. To the extent possible, this analysis will distinguish between the two implications of the comparative words “fewer” and “greater.”

See Table 7-1 at the end of this chapter for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project.

No Project (No Build) Alternative

CEQA requires the evaluation of the comparative impacts of the “No Project” alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

“[...] discuss [...] existing conditions [...] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” (*Id.*, subd. [e][2]) “If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the ‘no project’ alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property’s existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build,’ wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.” (*Id.*, subd. [e][3][B]).

The Lead Agencies have decided to evaluate a No Project (No Build) Alternative, which assumes that the current conditions of the project site would remain, and the site would not be developed. As described in this EIR, the project site consists of undeveloped agricultural land currently located within the Natomas area of unincorporated Sacramento County (County). In addition, a portion of Bayou Way is located within the project site and is generally laid out in an east-to-west direction. The No Project (No Build) Alternative would not meet any of the project objectives.



Aesthetics

The No Project (No Build) Alternative would consist of the continuation of the existing conditions of the project site. Because the No Project (No Build) Alternative would not introduce any new structures or buildings on the site, the Alternative would not degrade the existing visual character or quality of public views of the site and its surroundings, and the creation of new sources of light or glare would not occur. Thus, fewer impacts related to aesthetics would occur under the No Project (No Build) Alternative as compared to the proposed project. It should be noted that the significant and unavoidable impacts related to aesthetics would not occur under the No Project (No Build) Alternative.

Agricultural Resources

The No Project (No Build) Alternative would consist of the continuation of the existing conditions of the project site. The project site is currently designated Agricultural Cropland by Sacramento County; as such, the No Project (No Build) Alternative would preserve the site for agricultural uses. In addition, the project site includes prime agricultural land. Under the Sacramento LAFCo definition, “prime agricultural land” means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the applicable LAFCo qualifications. Therefore, the significant and unavoidable impacts related to the conversion of farmland to non-agricultural uses, as well as impacts associated with compliance with the policies of the Sacramento LAFCo pertaining to the conversion of agricultural land, would be eliminated under the Alternative.

Because the No Project (No Build) Alternative would not introduce any new structures or buildings on the site, the Alternative would not convert agricultural land to non-agricultural uses. Thus, impacts related to Agricultural Resources would not occur under the No Project (No Build) Alternative, and Mitigation Measures 4.2-1 and 4.2-5 would not be required.

Overall, impacts related to agricultural resources would not occur under the No Project (No Build) Alternative.

Air Quality, GHG Emissions, and Energy

Because the No Project (No Build) Alternative would not involve development of the project site, construction and operational activities would not occur under the alternative. Therefore, the Alternative would not result in construction or operational emissions associated with the proposed project, and would not generate emissions of ROG, NO_x, or particulate matter 10 micrometers in diameter or smaller (PM₁₀) in exceedance of the SMAQMD’s significance thresholds. Thus, the impact identified for the proposed project related to air quality would not occur under the No Project (No Build) Alternative, and Mitigation Measures 4.3-2, 4.3-3, and 4.3-7(a) through (c) would not be required. Overall, impacts related to air quality, GHG emissions, and energy would not occur under the No Project (No Build) Alternative.

Biological Resources

Under the No Project (No Build) Alternative, construction activities, including ground disturbance, would not occur on the project site. As such, the Alternative would not have the potential to impact special-status plants, giant garter snake, northwestern pond turtle, northern harrier, Swainson’s hawk, white-tailed kite, burrowing owl, and other birds protected under the MBTA. The Alternative would not include removal of trees and, thus, would not conflict with the City’s tree preservation ordinance. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse



effect on federal or State protected aquatic resources. As such, none of the mitigation measures related to biological resources required for the proposed project would be required under the Alternative. Overall, the majority of impacts identified for the proposed project related to Biological Resources would not occur under the No Project (No Build) Alternative.

It should be noted that the Natomas Basin Habitat Conservation Program (HCP) covers the area within Parcels 5 and 8. As such, any project including development on Parcels 5 and 8 would be required to pay a total of \$3,925,275.12 in HCP impact fees (based on the current 2024 HCP Fee of \$32,259 per acre) and 60.84 acres of off-site land dedication in support of the Natomas Basin HCP. However, under the No Project (No Build) Alternative, the Natomas Basin HCP would not receive such funds nor open space land dedications, which would hinder the HCP's ability to operate as compared to operations with the funds generated by the proposed project. Therefore, the potential impact to the Natomas Basin HCP would be slightly greater under the No Project (No Build) Alternative.

Cultural Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, ground-disturbing activities associated with construction would not occur, and the Alternative would not have the potential to result in impacts to cultural resources. Mitigation Measures 4.5-2 would not be required. Overall, the impacts identified for the proposed project related to Cultural Resources would not occur under the No Project (No Build) Alternative.

Geology and Soils

Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities associated with development, substantial soil erosion or loss of topsoil would not occur, and the Alternative would not result in significant disruptions, displacements, compaction, or excessive use of the on-site soils, or a substantial change in topography or ground surface relief features. In addition, the Alternative would not have the potential to destroy a unique paleontological resource or site or unique geologic feature. Because development would not occur, Mitigation Measures 4.6-3, requiring preparation of a final geotechnical engineering report, would not be necessary. Nor would Mitigation Measure 4.6-4 be required, because ground-disturbing activities associated with construction would not occur and any subsurface paleontological resources would not be encountered. Overall, no impacts related to Geology and Soils would occur under the No Project (No Build) Alternative.

Hazards and Hazardous Materials

The No Project (No Build) Alternative would not include any development; thus, the Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to organochloride pesticides (OCPs), the existing on-site soil stockpiles, and/or asbestos-containing building materials (ACBMs) and lead-based paints (LBPs). As such, Mitigation Measures 4.7-2(a) and 4.7-2(b) would not be required. It should be noted that any such hazardous materials located on-site would remain on-site under the No Project (No Build) Alternative. As such, the project site would not undergo any remediation efforts, potentially reducing the project site's suitability for any future development.

In addition, development would not occur within the airport influence area, and would therefore not subject people residing or working in the project area to hazards associated with the closest



airport. Therefore, Mitigation Measure 4.7-5(a) would not be required. Overall, no impacts related to Hazards and Hazardous Materials would occur under the No Project (No Build) Alternative.

Hydrology and Water Quality

The No Project (No Build) Alternative would not include any ground disturbance or otherwise alter existing site conditions and, thus, would not have the potential to result in construction or operational impacts related to water quality, changes in drainage patterns, placement of housing or improvements in a flood hazard area, release of pollutants due to project inundation, or increases in stormwater runoff rates. Thus, Mitigation Measures 4.8-1 through 4.8-5 would not be required. Overall, no impacts related to Hydrology and Water Quality would occur under the No Project (No Build) Alternative.

Land Use and Planning/Population and Housing

Because the No Project (No Build) Alternative would not include any development on-site, the Alternative would not cause an established community to be divided, would not conflict with any Sacramento LAFCo or City of Sacramento plans, policies, or regulations associated with avoiding or mitigating environmental effects, and would not induce any population growth. Therefore, no impacts related to Land Use and Planning/Population and Housing would occur under the No Project (No Build) Alternative.

Noise

The No Project (No Build) Alternative would not include any ground disturbance or otherwise alter existing site conditions and, thus, would not have the potential to result in construction or operational impacts related to noise or vibration generation. Therefore, Mitigation Measure 4.10-2 would not be required, and no impacts related to Noise would occur under the No Project (No Build) Alternative.

Public Services, Utilities, and Service Systems

Because the No Project (No Build) Alternative would not result in additional development on-site, an increase in demand for public services and utilities would not occur. As such, no impacts related to Public Services, Utilities, and Service Systems would occur under the No Project (No Build) Alternative.

Transportation

The No Project (No Build) Alternative would not generate construction or operational traffic on local roadways. Thus, Mitigation Measures 4.12-2 and 4.12-3 would not be required, and impacts related to Transportation would not occur under the No Project (No Build) Alternative.

Tribal Cultural Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, the Alternative would not have the potential to result in impacts to tribal cultural resources. Mitigation Measures 4.13-1(a) through 4.13-1(c) would not be required. Overall, the impacts identified for the proposed project related to Tribal Cultural Resources would not occur under the No Project (No Build) Alternative.

20 Percent Electric Fleet Alternative

The 20 Percent Electric Fleet Alternative would consist of buildout of the project site as proposed, including the future industrial warehouse buildout. Based on the square footages of the total developable lands, the proposed industrial warehouse development, and the future industrial



development, the Alternative would require the active warehouses to maintain 20 percent of the truck fleet as electric vehicles at full buildout of the Annexation area.

Because the 20 Percent Electric Fleet Alternative would include development of the project site with the same proposed uses, all of the project objectives would be met. In addition, because the 20 Percent Electric Fleet Alternative would include the operation of 20 percent of the overall fleet as electric vehicles over diesel-powered, the project objectives concerning energy efficiency, utilizing alternative energy sources, and minimizing impacts would be improved. In the case of an electric fleet, impacts associated with air quality and GHG emissions would be most significantly reduced by this alternative.

Aesthetics

The project site is predominantly undeveloped and affords views of a rural landscape from Interstate 5 (I-5), Metro Park Airway, and Access Roadway. The 20 Percent Electric Fleet Alternative would consist of buildout of the project site as proposed. Therefore, impacts to the existing visual character or quality of public views of the site and its surroundings under the 20 Percent Electric Fleet Alternative would be similar to the impacts evaluated in the Aesthetics chapter of the EIR.

The Aesthetics chapter of this EIR concluded that the majority of impacts to Aesthetics would be less than significant. While the Alternative and the proposed project would alter the visual character or quality of the site and surrounding area, feasible mitigation still would not exist to reduce the impact to a less-than-significant level. Thus, the project-specific and cumulative significant and unavoidable impacts related to substantially degrading the existing visual character or quality of public views of the site and its surroundings would still occur under the Alternative.

Overall, impacts related to Aesthetics would be similar under the 20 Percent Electric Fleet Alternative as compared to the proposed project, including the identified significant and unavoidable impact.

Agricultural Resources

The 20 Percent Electric Fleet Alternative would include development of the project site with commercial and industrial uses, similar to the proposed project. Therefore, the proposed project would result in similar significant and unavoidable impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and impacts to compliance with the policies of the Sacramento LAFCo pertaining to the conversion of agricultural land, as the proposed project. Overall, impacts related to Agricultural Resources would be similar under the 20 Percent Electric Fleet Alternative as compared to the proposed project, and Mitigation Measures 4.2-1 and 4.2-5 would still be required. It should be noted that the significant and unavoidable impacts related to agricultural resources would still occur, and, similar to the proposed project, feasible mitigation measures would not exist to reduce the significant and unavoidable impacts to a less-than-significant level.

Air Quality, GHG Emissions, and Energy

Under the 20 Percent Electric Fleet Alternative, the project site would still be developed with commercial and industrial uses, as well as associated improvements. Industrial uses are generally anticipated to involve the use of heavy-duty diesel trucks associated with the movement of goods to and from the sites. As previously noted, the 20 Percent Electric Fleet Alternative would require



20 percent of the associated truck fleet to be electric vehicles, rather than the proposed diesel-powered fleet, which would reduce criteria pollutant emissions associated with on-site development. However, because the 20 Percent Electric Fleet Alternative would still include the operation of heavy-duty diesel-powered trucks, the Alternative could result in an increase in emissions of diesel particulate matter (DPM) within the project sites and on the surrounding roadways.

For development projects that are anticipated to exceed the SMAQMD's operational emissions thresholds of significance for criteria pollutants, SMAQMD requires that the project proponent develop an Air Quality Mitigation Plan (AQMP) describing how the project would reduce operational criteria pollutant emissions from baseline conditions. Mitigation Measure 4.3-1 requires the use of a combination of engine Tier 3 or Tier 4 off-road construction equipment, or hybrid, electric, or alternatively fueled equipment during construction of the proposed project to reduce construction-related NO_x emissions, and 4.3-2 requires preparation and implementation of a project-specific AQMP, and thus, would still be required under the 20 Percent Electric Fleet Alternative.

In addition, the 20 Percent Electric Fleet Alternative would still exceed SMAQMD's 1,100 MTCO₂e/yr threshold of significance during construction. Similar to the proposed project, compliance with the SMAQMD BMPs would not be guaranteed. Thus, buildout of the Alternative would still be considered to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Consequently, Mitigation Measures 4.3-7(a) through (c) would still be required. Furthermore, Parcel 8 would still be designated for future industrial development under the 20 Percent Electric Fleet Alternative. Therefore, Mitigation Measure 4.3-3, related to conducting a health risk assessment if Parcel 8 is developed with a distribution center, would still be required.

With respect to the significant and unavoidable impacts to air quality identified by this EIR, the 20 Percent Electric Fleet Alternative would not eliminate such impacts. The anticipated ROG and NO_x emissions were calculated for project operations at 172.37 pounds per day (lbs/day) and 628.33 lbs/day, respectively. The AQMP required by Mitigation Measure 4.3-2 would reduce operational criteria air pollutant emissions by 35 percent; however, an additional 20 percent reduction associated with EVs would not sufficiently reduce emissions below applicable SMAQMD thresholds. Furthermore, a conservative reduction under the 20 Percent Electric Fleet Alternative would be a 20 percent reduction in truck-related emissions, as opposed to a reduction in all criteria air pollutant emissions. Therefore, a reasonable assumption can be made that the 20 Percent Electric Fleet Alternative would still include the same significant and unavoidable impacts related to air quality identified in this EIR.

Overall, because emissions would be fewer, impacts related to air quality, GHG emissions, and energy would be fewer under the 20 Percent Electric Fleet Alternative as compared to the proposed project. It should be noted that the significant and unavoidable impacts to air quality would still occur under the 20 Percent Electric Fleet Alternative.

Biological Resources

Similar to the proposed project, the 20 Percent Electric Fleet Alternative would include ground-disturbing activities on the project site and, thus, would have the potential to impact special-status plants, giant garter snake, northwestern pond turtle, northern harrier, Swainson's hawk, white-



tailed kite, burrowing owl, and other birds protected under the MBTA. Because the 20 Percent Electric Fleet Alternative would include buildout of the proposed project, the Alternative would result in a similar disturbance area as compared to the proposed project. Therefore, the analysis within the Biological Resources chapter of this EIR would still apply to the Alternative, and Mitigation Measures 4.4-1(a) and (b), 4.4-3(a), 4.4-4(a) and (b), 4.4-5(a) and (b), 4.4-6(a), 4.4-8(a), 4.4-9(a) and (b), 4.4-10(a) through (c), 4.4-11(a) through (f), 4.4-12, and 4.4-13(a) through (c) would still be required. Therefore, overall impacts to Biological Resources would be similar under the Alternative compared to the proposed project.

Cultural Resources

The 20 Percent Electric Fleet Alternative would result in the development of a similar industrial facility as the proposed project. Similar to the proposed project, the 20 Percent Electric Fleet Alternative would result in on-site disturbance to accommodate new development. Therefore, Mitigation Measure 4.5-2 would still apply to the 20 Percent Electric Fleet Alternative to mitigate the potentially significant impact associated with the disturbance or destruction of historical resources, archaeological resources, and human remains during construction. Overall, potential impacts related to Cultural Resources would be similar under the 20 Percent Electric Fleet Alternative compared to the proposed project.

Geology and Soils

As noted above, the 20 Percent Electric Fleet Alternative would include the same overall area of disturbance compared to the proposed project. Consequently, the potential for grading and other ground-disturbing activities to result in substantial soil erosion or loss of topsoil, significant disruptions, displacements, compaction or overcrowding of the soil, or substantial change in topography or ground surface relief features would be similar to the proposed project. As a result, the Alternative would have a potential impact associated with subsidence/settlement, liquefaction, and/or expansive soils, and Mitigation Measure 4.6-3 requiring preparation of a final geotechnical engineering report to ensure adequate structural support of the proposed improvements would still be required. In addition, Mitigation Measure 4.6-4 would still be required to address potential impacts to paleontological resources. Overall, impacts related to Geology and Soils would be similar under the 20 Percent Electric Fleet Alternative compared to the proposed project.

Hazards and Hazardous Materials

As previously discussed, the 20 Percent Electric Fleet Alternative would entail buildout of the project as proposed. Because the disturbance area for the 20 Percent Electric Fleet Alternative would be the same as compared to the proposed project, all recognized environmental conditions (RECs) identified on the project site would still occur under the Alternative. Thus, similar to the proposed project, the 20 Percent Electric Fleet Alternative could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to soils associated with residual organochloride pesticides (OCPs), the existing on-site soil stockpiles, and/or ACBMs and LBPs. As such, Mitigation Measures 4.7-2(a) and 5.7-2(b) would still be required. Furthermore, because the Alternative would still be located within an airport land use plan, Mitigation Measure 4.7-5(a) would still be required. Overall, impacts related to Hazards and Hazardous Materials under the 20 Percent Electric Fleet Alternative would be similar to the proposed project.

Hydrology and Water Quality

Given that the 20 Percent Electric Fleet Alternative would include the same area of disturbance compared to the proposed project, the potential for the Alternative to result in construction impacts



related to water quality would also be the same. In addition, because the project site would still be developed with impervious surfaces, the potential for changes in drainage patterns and increases in stormwater runoff rates would be the same when compared to the proposed project. Therefore, Mitigation Measures 4.8-1 through 4.8-5 would still be required, and impacts related to Hydrology and Water Quality under the 20 Percent Electric Fleet Alternative would be similar to the proposed project.

Land Use and Planning/Population and Housing

Because the 20 Percent Electric Fleet Alternative would include buildout of the proposed project as proposed, impacts to Land Use and Planning/Population and Housing would be similar to the proposed project as evaluated in this EIR. Therefore, the 20 Percent Electric Fleet Alternative would result in similar impacts related to Land Use and Planning/Population and Housing, and no mitigation measures would be required.

Noise

The 20 Percent Electric Fleet Alternative would include the same area of disturbance compared to the proposed project and, thus, the potential to result in construction impacts related to noise or vibration generation would be the same. Electric motors are quieter than diesel vehicles, but the 20 Percent Electric Fleet Alternative would not eliminate noise from standard engines that would comprise 80 percent of the fleet. It should be noted that the majority of single event noise associated with the truck fleet come from air brakes and back-up warning alarms, neither of which would be addressed by the Alternative. Therefore, Mitigation Measures 4.10-2, which reduces impacts associated with a permanent increase in ambient noise levels, would still be required. Overall, development of the 20 Percent Electric Fleet Alternative would result in similar impacts related to Noise as compared to the proposed project.

Public Services, Utilities, and Service Systems

Because the 20 Percent Electric Fleet Alternative would result in similar development as evaluated in the Public Services, Utilities, and Service Systems chapter, a significant increase in demand for public services, similar to the proposed project, would not occur. Additionally, the 20 Percent Electric Fleet Alternative would require the same improvements to utilities and infrastructure associated with buildout of the proposed project, including new connections to existing underground electrical infrastructure within I-5 and Power Line Road. Furthermore, EVs would require installation of additional electrical infrastructure to ensure the fleet would be able to charge. Overall, development of the 20 Percent Electric Fleet Alternative would result in similar impacts related to Public Services, Utilities, and Service Systems compared to the proposed project.

Transportation

As previously discussed, the 20 Percent Electric Fleet Alternative would entail buildout of the project as proposed. As detailed in Chapter 4.12, Transportation, of this EIR, the VMT analysis contained therein focused on the impact of employee-generated trips, as industrial uses often inherently have higher VMT per employee than other employment types. Therefore, the electrification of 20 percent of the truck fleet would not change the conclusions of the EIR. Because the development under the 20 Percent Electric Fleet Alternative would be the same as compared to the proposed project, the Alternative would still require Mitigation Measures 4.12-2 and 4.12-3 to reduce potential conflicts with a program, plan, ordinance or policy addressing the circulation system, as well as CEQA Guidelines Section 15064.3, subdivision (b), during



operations. Overall, potential impacts related to Transportation would be similar under the 20 Percent Electric Fleet Alternative compared to the proposed project.

Tribal Cultural Resources

While the 20 Percent Electric Fleet Alternative would result in the same area of disturbance as the proposed project. Therefore, Mitigation Measures 4.13-1(a), (b), and (c) would still be required under the 20 Percent Electric Fleet Alternative to mitigate the potentially significant impact associated with Tribal Cultural Resources, as defined in PRC Section 21074. Overall, potential impacts related to Tribal Cultural Resources would be similar under the 20 Percent Electric Fleet Alternative compared to the proposed project.

Reduced Footprint Alternative

The Reduced Footprint Alternative would consist of buildout of the project site as proposed for the majority of the parcels and leave Parcels 9, 10, and 11, as well as an approximately 51.3-acre portion of Parcel 8, as undeveloped agricultural land (see Figure 7-1). As shown in Figure 7-1, in comparison to the proposed project, the Reduced Footprint Alternative would result in a reduction of 419,809.4 sf of industrial buildings and would preserve approximately 51.3 acres of agricultural land and 18 acres of other land, including the wetlands contained within Parcels 10 and 11, for a total of 69.3 acres of preserved land. Because the Reduced Footprint Alternative would include development of the project site with the proposed uses for the majority of the parcels, the project objectives would be met.

Aesthetics

Similar to the proposed project, the Reduced Footprint Alternative would include development of the project site with commercial and industrial uses. However, the Alternative would result in a reduction of 419,809.4 sf of industrial buildings as compared to the proposed project. Due to the reduced footprint of industrial uses that would be developed on-site, the Alternative would inherently include less buildings to obscure existing rural landscape views, which could soften the aesthetic effect as compared to the proposed project.

Nonetheless, given that the project site is predominantly undeveloped and affords views from I-5, Metro Park Airway, and Access Roadway, the existing visual character of the site would still be degraded under the Reduced Footprint Alternative, similarly to the degradation under the proposed project. Overall, impacts related to Aesthetics would be similar under the Reduced Footprint Alternative as compared to the proposed project, and the project-specific significant and unavoidable impacts related to substantially degrading the existing visual character or quality of public views of the site and its surroundings would still occur under the Alternative.

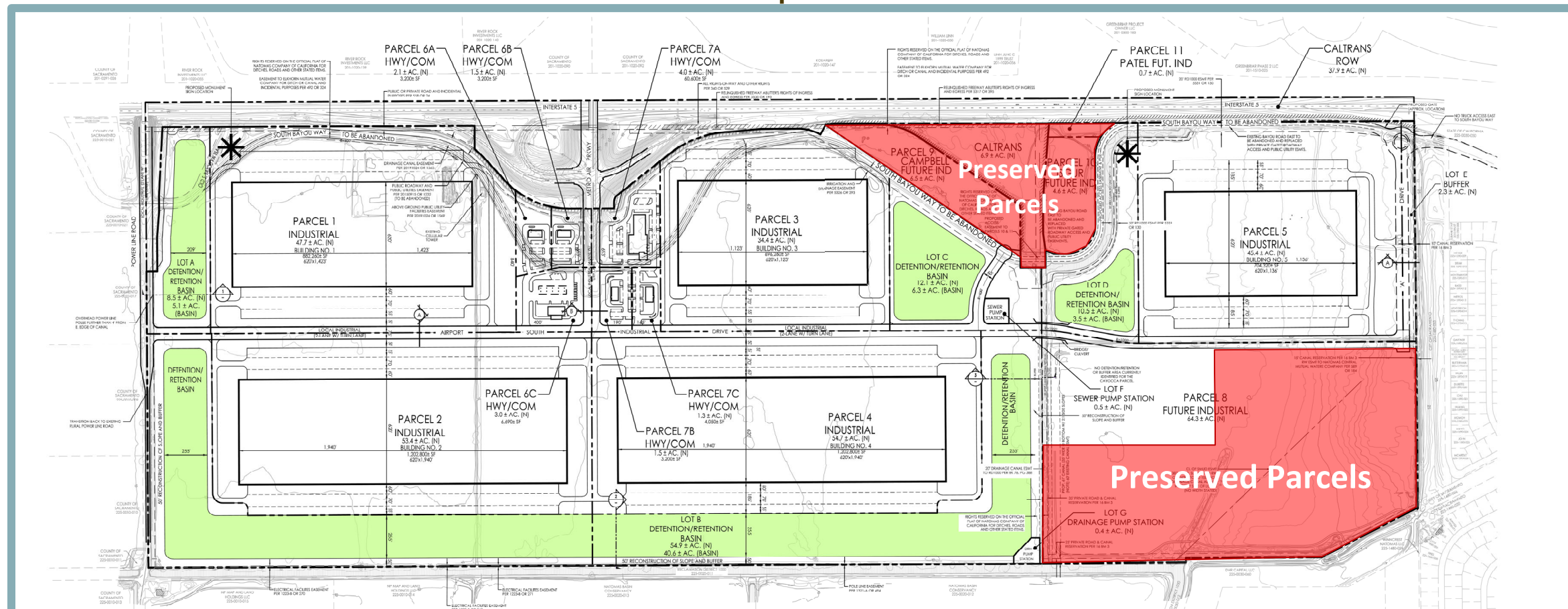
Agricultural Resources

The Reduced Footprint Alternative would include development of the project site with commercial and industrial uses, similar to the proposed project. However, the Alternative would preserve 51.3 acres of agricultural land located on the project site in Parcel 8.

Nonetheless, because the prime agricultural land located on-site is contained entirely within Parcel 5, which would not be preserved under the Reduced Footprint Alternative, the significant and unavoidable impacts related to the conversion of farmland to non-agricultural uses, as well as impacts associated with compliance with the policies of the Sacramento LAFCo pertaining to the conversion of agricultural land, would not be eliminated under the Reduced Footprint Alternative.

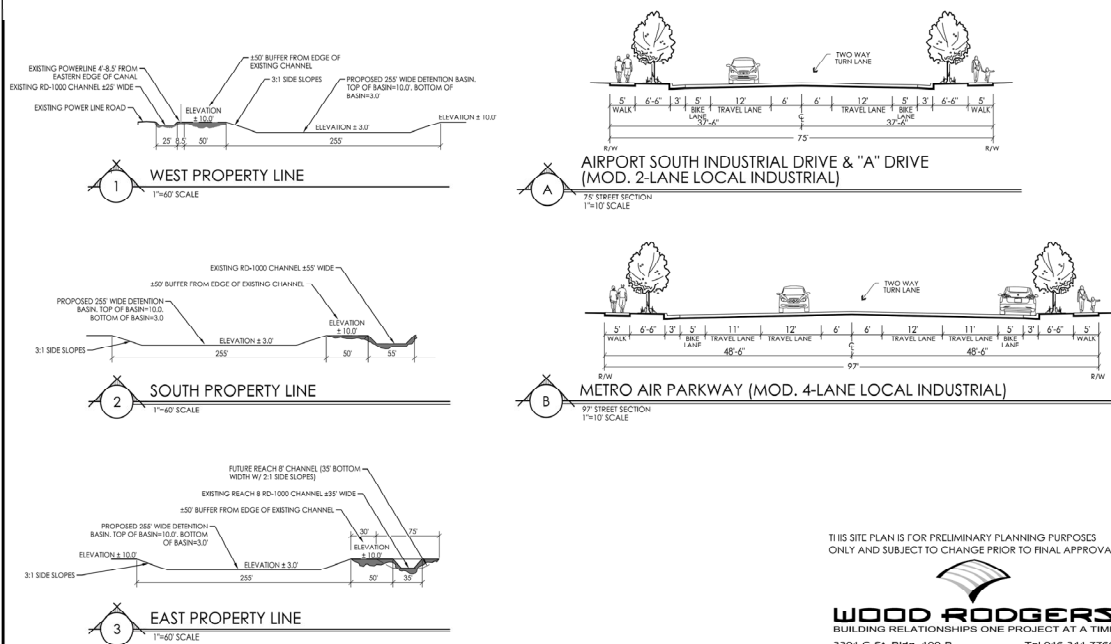
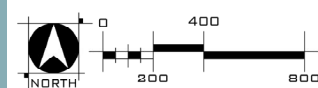
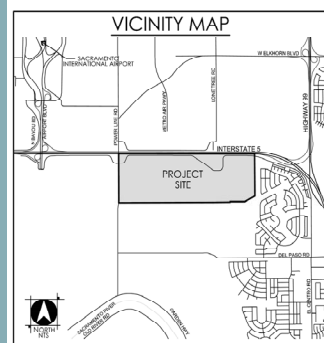


Figure 7-1
 Reduced Footprint Alternative



| Site Plan Lot Number | Land Owner | Proposed Land Use | GP Designation | Zone | Net Acreage | Bldg SF | Floor Area Ratio (FAR) | FAR Calc'd or Used for SF Est. | Use for Est. Bldg SF |
|---|------------------------------|---------------------------|-----------------------------|------|--------------|--------------------|------------------------|--------------------------------|----------------------|
| Project Applicant Sponsored Lands | | | | | | | | | |
| 1 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 47.7 | 882,300 | 0.43 | Calculated | 979,450 |
| 2 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 53.4 | 1,202,800 | 0.52 | Calculated | 1,335,200 |
| 3 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 34.4 | 696,260 | 0.48 | Calculated | 772,900 |
| 4 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 54.7 | 1,202,800 | 0.50 | Calculated | 1,335,200 |
| 5 | NorthPoint / AKT Investments | Warehouse Distribution | Industrial (FAR: N/A-1.0) | M-1 | 85.4 | 704,320 | 0.36 | Calculated | 781,800 |
| Subtotal Warehouse | | | | | 278.6 | 4,588,480 | 0.45 | Average | 5,294,500 |
| 6A | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 2.1 | 3,200 | 0.03 | Calculated | 3,900 |
| 6B | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 1.5 | 3,200 | 0.05 | Calculated | 3,900 |
| 6C | NorthPoint / AKT Investments | Fueling Station/Carwash | EC-Low Rise (FAR: 0.15-1.0) | HC | 3.0 | 6,690 | 0.05 | Calculated | 8,100 |
| 7A | NorthPoint / AKT Investments | Hotel | EC-Low Rise (FAR: 0.15-1.0) | HC | 4.0 | 40,000 | 0.35 | Calculated | 74,900 |
| 7B | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 1.5 | 3,200 | 0.05 | Calculated | 3,900 |
| 7C | NorthPoint / AKT Investments | Restaurant | EC-Low Rise (FAR: 0.15-1.0) | HC | 1.3 | 5,050 | 0.07 | Calculated | 5,000 |
| Subtotal Retail Commercial | | | | | 13.4 | 80,940 | 0.14 | Average | 98,200 |
| A | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 8.5 | ----- | ----- | ----- | ----- |
| B | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 54.0 | ----- | ----- | ----- | ----- |
| C | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 12.1 | ----- | ----- | ----- | ----- |
| D | NorthPoint / AKT Investments | Retention/Detention Basin | Industrial | M-1 | 10.5 | ----- | ----- | ----- | ----- |
| E | NorthPoint / AKT Investments | Buffer | Industrial | M-1 | 2.3 | ----- | ----- | ----- | ----- |
| F | NorthPoint / AKT Investments | Sewer Pump Station | Industrial | M-1 | 0.5 | ----- | ----- | ----- | ----- |
| G | NorthPoint / AKT Investments | Drainage Pump Station | Industrial | M-1 | 0.4 | ----- | ----- | ----- | ----- |
| Subtotal Public Facilities | | | | | 89.2 | ----- | ----- | ----- | ----- |
| Subtotal Internal Roadways | | | | | 15.3 | ----- | ----- | ----- | ----- |
| Total for Applicant Sponsored Lands | | | | | 393.5 | 4,769,380.0 | 0.31 | Average | 5,392,700.0 |
| Future Industrial Lands | | | | | | | | | |
| 9 | Caltrans | Future Industrial | Industrial | M-1 | 64.3 | 980,318 | 0.35 | Estimated | 1,088,200 |
| 10 | Campbell | Future Industrial | Industrial | M-1 | 6.5 | 99,099 | 0.35 | Estimated | 110,000 |
| 11 | Isur | Future Industrial | Industrial | M-1 | 4.6 | 70,132 | 0.35 | Estimated | 77,900 |
| | Patel | Future Industrial | Industrial | M-1 | 0.7 | 10,479 | 0.35 | Estimated | 11,900 |
| | Caltrans Remnant | Future Industrial | Industrial | M-1 | 6.0 | 105,122 | 0.35 | Estimated | 118,800 |
| Subtotal | | | | | 82.0 | 1,265,118 | 0.35 | Check Average | 1,404,800 |
| Subtotal Developable Lands (Warehousing/Distribution) | | | | | 318.6 | 5,953,836 | 0.43 | Average | 6,697,300 |
| Subtotal Developable Lands (Highway Commercial) | | | | | 13.4 | 80,940 | 0.14 | Average | 98,200 |
| Subtotal Developable Lands (Public Facilities and Internal Roadways) | | | | | 104.5 | ----- | ----- | ----- | ----- |
| Total Developable Lands | | | | | 436.5 | 6,034,798 | 0.32 | Average | 6,797,500 |
| Caltrans I-5 Fee Title R/W | | | | | 37.9 | ----- | ----- | ----- | ----- |
| Grand Total | | | | | 474.4 | ----- | ----- | ----- | ----- |

Notes:
 1. Net acreage used in order to estimate Building Square footage information and / or calculate the FAR.
 2. Internal Roadways include ASD Drive, Metro Air Parkway and Power Line Road.
 3. Caltrans I-5 Fee Title lands included in the land proposed for annexation to the City of Sacramento.
 4. Sq-ft for building coverage 11 based on the site plan for Applicant lands and 2) calculated based on an average FAR for Future Industrial Lands.
 5. Application of a 11% factor applied to the industrial lands and 21% added to the retail / commercial lands to arrive at the planning level estimated totals.



THIS SITE PLAN IS FOR PRELIMINARY PLANNING PURPOSES ONLY AND SUBJECT TO CHANGE PRIOR TO FINAL APPROVAL.

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In addition, the ability to farm on Parcel 8 would be significantly diminished or indirectly removed by the partial development proposed under the Alternative.

Overall, due to the slightly decreased disturbance area, impacts related to Agricultural Resources would be fewer under the Reduced Footprint Alternative as compared to the proposed project, and Mitigation Measures 4.2-1 and 4.2-5 would still be required.

It should be noted that the significant and unavoidable impacts related to agricultural resources would still occur, and, similar to the proposed project, feasible mitigation measures to reduce the identified significant and unavoidable impacts to a less-than-significant level would not exist.

Air Quality, GHG Emissions, and Energy

Under the Reduced Footprint Alternative, the project site would still be developed with commercial and industrial uses, as well as associated improvements. Because the Reduced Footprint Alternative would involve a smaller area of disturbance and building envelope than the proposed project, the criteria air pollutant and GHG emissions associated with the Alternative would be less than the proposed project. Specifically, the Reduced Footprint Alternative would preserve 69.3 acres of land and reduce industrial development by 419,809.4 sf at full buildout. Nonetheless, emissions associated with project operations could still create a potentially significant impact related to conflicting with or obstructing implementation of the applicable air quality plan. For development projects that are anticipated to exceed the SMAQMD's operational emissions thresholds of significance for criteria pollutants, SMAQMD requires that the project proponent develop an Air Quality Mitigation Plan (AQMP) describing how the project would reduce operational criteria pollutant emissions from baseline conditions. Mitigation Measure 4.3-2 requires preparation and implementation of a project-specific AQMP, and would still be required under the Reduced Footprint Alternative.

In addition, the Reduced Footprint Alternative would still exceed SMAQMD's 1,100 MTCO₂e/yr threshold of significance during construction and compliance with the SMAQMD BMPs could not be ensured. Thus, the Alternative would still be considered to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Consequently, Mitigation Measures 4.3-7(a) through (c) would still be required.

Although the Reduced Footprint Alternative includes preserving approximately 13 acres of Parcel 8 for future development, it should be noted that any future development would be located in the northwestern corner of the parcel. Therefore, the new footprint would restrict building envelope to locations outside the 1,000-foot setback distance for sensitive land uses from distribution centers recommended by the California Air Resources Board (CARB), and Mitigation Measure 4.3-3 would not be required.

Overall, impacts related to air quality, GHG emissions, and energy would be fewer under the Reduced Footprint Alternative as compared to the proposed project due to the decreased on-site industrial development. It should be noted that the significant and unavoidable impacts related to air quality, GHG emissions, and energy would still occur under the Alternative.

Biological Resources

Similar to the proposed project, the Reduced Footprint Alternative would include ground-disturbing activities on the project site and, thus, would have the potential to impact special-status



plants, giant garter snake, northwestern pond turtle, northern harrier, Swainson's hawk, white-tailed kite, burrowing owl, and other birds protected under the MBTA. Therefore, Mitigation Measures 4.4-1(b), 4.4-4(b), 4.4-5(b), 4.4-9(a) and (b), 4.4-10(a) through (c), 4.4-11(a) through (f), and 4.4-13(a) through (c) would still be required.

The lands associated with the HCP are contained within the portion of Parcel 8 preserved under the Reduced Footprint Alternative. As such, the mitigation measures associated with non-HCP lands, specifically Mitigation Measures 4.4-1(a), 4.4-3(a), 4.4-4(a), 4.4-5(a), 4.4-6(a), 4.4-8(a), and 4.4-12, would not apply to the preserved acreage, but would still be required under the Alternative. However, similar to the No Project (No Build) Alternative, the Natomas Basin HCP would receive reduced permitting funds under the Reduced Footprint Alternative. In addition, the Alternative would result in a decreased disturbance area as compared to the proposed project, which would result in a lesser potential to affect the aforementioned species. Similarly, the Reduced Footprint Alternative would preserve the USFWS-designated wetlands in Parcels 10 and 11, thereby preserving potentially sensitive habitat. Mitigation Measures 4.4-11(a) through (f), which mitigate impacts associated with aquatic resources on-site, would still be required under the Reduced Footprint Alternative because of the aquatic resources located outside the preserved parcels.

Overall, impacts to biological resources would be fewer under the Alternative compared to the proposed project, given that the amount of habitat disturbed during construction would be reduced.

Cultural Resources

Similar to the proposed project, the Reduced Footprint Alternative would include development of the project site with commercial and industrial uses, similar to the proposed project. However, as noted above, the Reduced Density Alternative would result in a decreased overall disturbance area within the project site relative to the proposed project. Nonetheless, Mitigation Measure 4.5-2 would still be required because the potential for the Reduced Footprint Alternative to result in disturbance or destruction of archaeological resources and human remains would still occur under the Alternative. Overall, because of the reduced disturbance area that would occur under the Reduced Footprint Alternative, potential impacts related to Cultural Resources could be fewer under the Reduced Density Alternative compared to the proposed project.

Geology and Soils

As noted above, the Reduced Footprint Alternative would include a smaller overall area of disturbance compared to the proposed project. Consequently, the potential for grading and other ground-disturbing activities to result in substantial soil erosion or loss of topsoil, significant disruptions, displacements, compaction or overcrowding of the soil, or substantial change in topography or ground surface relief features would be decreased. Similarly, the Alternative would have a slightly decreased potential to encounter and destroy a unique paleontological resource or site or unique geologic feature. Nonetheless, because construction and grading activities would still occur on the project site outside of the preserved parcels, Mitigation Measure 4.6-4 would still be required. In addition, Mitigation Measure 4.6-3, which requires preparation of a final geotechnical engineering report, would still be required to ensure the industrial buildings under the Reduced Footprint Alternative would be provided adequate structural support. Overall, impacts related to Geology and Soils would be fewer under the Reduced Footprint Alternative compared to the proposed project.



Hazards and Hazardous Materials

As discussed above, the Reduced Footprint Alternative would entail a similar buildout of the project as proposed. Although the overall disturbance area for the Reduced Footprint Alternative would be decreased as compared to the proposed project, the Alternative would still result in impacts related to all RECs identified on the project site. Thus, similar to the proposed project, the Reduced Footprint Alternative would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to soils associated with residual OCPs, the existing on-site soil stockpiles in the northwest portion of the project site, to the east of the cell tower, and/or ACBMs and LBPs. As such, Mitigation Measures 4.7-2(a) and 5.7-2(b) would still be required. Furthermore, because the Alternative would still be located within an airport land use plan, Mitigation Measure 4.7-5(a) would still be required. Overall, impacts related to Hazards and Hazardous Materials under the Reduced Footprint Alternative would be similar to the proposed project.

Hydrology and Water Quality

Given that the Reduced Footprint Alternative would include a smaller overall area of disturbance compared to the proposed project, the potential for the Alternative to result in construction or operational impacts related to water quality would be decreased. In addition, because a smaller portion of the site would be developed with impervious surfaces, the potential for changes in drainage patterns and increases in stormwater runoff rates would be reduced compared to the proposed project. Nonetheless, Mitigation Measures 4.8-1 through 4.8-5 would still be required to ensure that impacts to on-site drainage patterns, as well as to water quality during project construction and operation, would not occur. Overall, because the reduced surface area proposed under the Reduced Footprint Alternative would generate less stormwater runoff, impacts related to Hydrology and Water Quality under the Reduced Footprint Alternative would be fewer compared to the proposed project.

Land Use and Planning/Population and Housing

Because the Reduced Footprint Alternative would include buildout of the proposed project as proposed, impacts to Land Use and Planning/Population and Housing would be similar to the proposed project, as evaluated in this EIR. Therefore, no mitigation measures would be required, and the Reduced Footprint Alternative would result in similar impacts related to Land Use and Planning/Population and Housing.

Noise

The Reduced Footprint Alternative would include a smaller overall area of disturbance compared to the proposed project and, thus, the potential to result in construction and operational impacts related to noise or vibration generation would be decreased. In addition, the preserved parcels would function as an attenuation buffer, and would reduce the noise and vibration perceived by the sensitive receptors to the east and southeast of the project site. Therefore, Mitigation Measure 4.10-2, which required installation of noise barrier walls to reduce impacts associated with a permanent increase in ambient noise levels, would not be required under the Reduced Footprint Alternative. Overall, development of the Reduced Footprint Alternative would result in fewer impacts related to Noise as compared to the proposed project.

Public Services, Utilities, and Service Systems

Because the Reduced Footprint Alternative would result in less development on-site, a decrease in demand for public services and utilities would occur. Overall, development of the Reduced



Footprint Alternative would result in fewer impacts related to Public Services, Utilities, and Service Systems as compared to the proposed project.

Transportation

As previously discussed, the Reduced Footprint Alternative would preserve Parcels 9, 10, and 11, as well as a portion of Parcel 8, and result in a reduction of 419,809.4 sf of industrial buildings, which would reduce the number of truck trips associated with on-site development. As previously noted, Chapter 4.12, Transportation, of this EIR focused on the impact of employee-generated trips, as industrial uses often inherently have higher VMT per employee than other employment types. Therefore, the Reduced Footprint Alternative would have a lower VMT rate than the proposed project. However, because the Alternative would still result in industrial development and new roadways, the Alternative would still require Mitigation Measures 4.12-2 and 4.12-3 to reduce potential conflicts with a program, plan, ordinance or policy addressing the circulation system, as well as CEQA Guidelines Section 15064.3, subdivision (b), during operations. Overall, because the mitigation measures would be adjusted but still required, potential impacts related to Transportation would be similar under the Reduced Footprint Alternative compared to the proposed project.

Tribal Cultural Resources

As noted above, the Reduced Footprint Alternative would result in a decreased overall disturbance area within the project site relative to the proposed project. Given that the Alternative would still result in ground disturbance, Mitigation Measures 4.13-1(a) through (c) would still be required. Nonetheless, due to the slightly decreased disturbance area of the Alternative, potential impacts related to Tribal Cultural Resources could be fewer under the Reduced Footprint Alternative compared to the proposed project.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. The environmentally superior alternative is generally the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the Lead Agencies. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In this case, despite the potentially greater impact related to HCP funding, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, many of the impacts resulting from the proposed project would not occur under the Alternative, as shown in Table 7-1 below.

The No Project (No Build) Alternative would not meet any of the project objectives. Because the Reduced Footprint Alternative and the 20 Percent Electric Fleet Alternative would include development of the project site following an amendment to the City’s Sphere of Influence and an Annexation of the project site into the City, Objective #1 would be met by both Alternatives. In addition, because the Alternatives would include the development of industrial and commercial uses on-site, most of the remaining project objectives would be fully or partially met. More specifically, the Reduced Footprint Alternative would generally meet most of the project



objectives; however, because less industrial square footage would be constructed at the project site, Objectives #3 and #4 would only be partly met.

As discussed throughout this chapter and shown in Table 7-1, the Reduced Footprint Alternative would result in fewer impacts than the proposed project related to nine of the 13 issue areas, and would result in similar impacts as the proposed project for the remaining four issue areas for which project impacts were identified. However, under the 20 Percent Electric Fleet Alternative and the Reduced Footprint Alternative, the significant and unavoidable impacts related to aesthetics, which were identified for the proposed project, would still occur. Similarly, the significant and unavoidable impact related to agricultural resources would still occur under the 20 Percent Electric Fleet alternative, and the Reduced Footprint Alternative would still include the significant and unavoidable impact associated with air quality, GHG emissions, and energy associated with the proposed project.

Based on the above, because the Reduced Footprint Alternative would result in fewer impacts than the proposed project related to nine of the 13 issue areas, and would result in similar impacts as the proposed project for the remaining four issue areas for which project impacts were identified, the Reduced Footprint Alternative would be considered the Environmentally Superior Alternative. As discussed above, the significant and unavoidable impacts related to Aesthetics, Agricultural Resources, and Air Quality, GHG Emissions, and Energy that were identified for the proposed project would still occur under the Reduced Footprint Alternative.



**Table 7-1
 Comparison of Environmental Impacts for Project Alternatives**

| Resource Area | Proposed Project | No Project (No Build) Alternative | 20 Percent Electric Fleet Alternative | Reduced Footprint Alternative |
|--|---------------------------------------|--|--|--------------------------------------|
| Aesthetics | Significant and Unavoidable | None | Similar* | Similar* |
| Agricultural Resources | Significant and Unavoidable | None | Similar* | Fewer* |
| Air Quality, GHG Emissions, and Energy | Significant and Unavoidable | None | Fewer* | Fewer* |
| Biological Resources | Less-Than-Significant with Mitigation | Greater | Similar | Fewer |
| Cultural Resources | Less-Than-Significant with Mitigation | None | Similar | Fewer |
| Geology and Soils | Less-Than-Significant with Mitigation | None | Similar | Fewer |
| Hazards and Hazardous Materials | Less-Than-Significant with Mitigation | None | Similar | Similar |
| Hydrology and Water Quality | Less-Than-Significant with Mitigation | None | Similar | Fewer |
| Land Use and Planning/ Population and Housing | Less-Than-Significant | None | Similar | Similar |
| Noise | Less-Than-Significant with Mitigation | None | Similar | Fewer |
| Public Services, Utilities, and Service Systems | Less-Than-Significant | None | Similar | Fewer |
| Transportation | Less-Than-Significant with Mitigation | None | Similar | Similar |
| Tribal Cultural Resources | Less-Than-Significant with Mitigation | None | Similar | Fewer |
| | Total Greater: | 1 | 0 | 0 |
| | Total Fewer: | 12 | 1 | 9 |
| | Total Similar: | 0 | 12 | 4 |
| Note: No Impact = "None;" Greater than the Proposed Project = "Greater," Less than Proposed Project = "Fewer;" and Similar to Proposed Project = "Similar" | | | | |
| * Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative. | | | | |



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8. REFERENCES

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